



Colorado Snowmobile Association, Inc.

Preserve, Promote and Preserve the Sport of Snowmobiling

PO Box 395

Walden, CO 80480

February 27, 2013

Public Comments Processing
Attn: FWS-R6-ES-2012-0108
Division of Policy and Directives Management
U.S. Fish and Wildlife Service
4401 N. Fairfax Drive, MS2042-PDM
Arlington, VA 22203.

RE: Gunnison Sage Grouse Critical Habitat

Dear Sirs:

Please accept this correspondence as the comments of the Colorado Snowmobile Association ("CSA") with regard to the designation of critical habitat for the Gunnison Sage Grouse. Prior to addressing the specific concerns regarding habitat designations, a brief history of the Organization will allow proper understanding of our concerns. CSA was founded in 1970 to unite winter motorized recreationists across the state to enjoy their passion. CSA currently has 2,500 members. CSA has become the voice of organized snowmobiling seeking to **advance, promote and preserve the sport of snowmobiling** by working with Federal and state land management agencies and local, state and federal legislators.

CSA supports protection of endangered species, as this is a critical component of federal land planning. CSA has a long history of involvement with the management of endangered species such as the lynx and wolverine. This experience allows the Organization to determine significant benefits for any species can be obtained without significantly impacting local communities. These scale of these concerns are more extensively discussed in the comments provided separately by the Colorado Off Highway Vehicle Coalition and Trail Preservation Alliance. These concerns are not specifically addressed in these comments to avoid repetition of similar information. CSA vigorously notes that dispersed winter motorized recreation is a significant contributor to the Colorado economy as well. As noted in the COHVCO economic contribution analysis, snowmobile recreation contributes over \$100,000,000 annually to the Colorado

economy. A copy of this report has been included with these comments for your reference.

CSA is very concerned that critical habitat boundaries remain in current locations to allow for winter recreational activities in areas where there is consistently sufficient snowfall to make the areas unsuitable for habitat designations. Management of routes in the habitat areas is also of significant concern as continued access to routes is necessary to obtain access to recreational opportunities on lands that are adjacent to the habitat areas. Recreational access to these areas could be achieved by allowing connector style routes to remain open for periods necessary for winter recreation. These usages would not be in conflict with seasonal route closures as winter recreational activities are traditionally concluded prior to grouse moving to lek areas.

After reviewing the boundaries of the proposed critical habitat areas there does not appear to be a significant conflict with areas used for winter recreation when there is sufficient snowfall and the habitat areas. CSA would be vigorously opposed to a single winter and summer management standard for any heavy snowfall area, as designated routes are a completely valid management strategy for summer recreation but are completely inappropriate for management of winter recreation as these heavy snowfall areas simply are not winter habitat areas for the Grouse.

1. Access Routes and Groomed Routes in Habitat Areas.

The habitat designation decision will address the management of over 1.7 million acres in Southwestern Colorado, which forces CSA to conclude the management of many routes used to gain access to winter recreational areas could be impacted by overly protective route management standards. CSA believes our most serious concern involves possible closures of multiple use routes in habitat areas used to access recreational opportunities outside the habitat areas, such as a route that connects a municipality to a winter recreation area and merely crosses a habitat area. Frequently these connector routes are utilized for all recreational uses and are low speed low volume routes that pass through habitat areas to access recreational opportunities. Parking is only obtained by pulling to the shoulder of the roadway once significant snowfall is reached. Loss of these connector routes would be a significant concern for CSA as most users are not able to ride snowmobiles from a local municipality to the areas where winter motorized recreation is occurring.

CSA is aware that designated routes with seasonal closures could be a significant benefit to the Gunnison Sage Grouse during certain times of the year, such as during active lek

usage times. While a designated route system is a benefit, winter periods are not identified as a time when Grouse are concentrated in a single area or are exhibiting a high level of sensitivity to disturbance. CSA vigorously asserts that seasonal closures and designated route limitations in habitat areas must allow flexibility in the designation process to account for routes that are merely passing through the habitat areas to gain access to winter recreational opportunities outside the habitat areas. Blanket closures would result in significant negative economic impacts to the winter economies of Colorado communities and would generate little benefit for the Grouse.

2a. Habitat area boundaries.

There has been a wide range of scientific research conducted into the various factors that pose threats to the Gunnison Sage Grouse. The low level threat of recreation to the Grouse is clearly identified in the listing decision issued in conjunction with the proposed critical habitat designations, which specifically states:

"Recreational activities as discussed above do not singularly pose a threat to Gunnison sage-grouse. However, there may be certain situations where recreational activities are impacting local concentrations of Gunnison sage grouse, especially in areas where habitat is already fragmented such as in the six small populations and in certain areas within the Gunnison Basin." ¹

While the decision makes no distinction regarding possible impacts of snowmobile recreation on the Gunnison Sage Grouse, CSA has conducted an extensive review of various listing decisions and texts that have been published relative to the Gunnison Sage Grouse. These documents uniformly conclude that winter sage grouse habitat and snow based winter recreation will not be found to be in significant conflict as Sage Grouse winter habitat depends on exposed sage brush at lower altitudes. These winter habitat needs appear to be well established as follows:

"The spatial distribution of sage-grouse in winter is often related to snow depth(Patterson 1952; Dalke et al 1963; Gill 1965; Klebenow 1973, 1985; Beck 1975, 1977; Welch et al 1990). During relatively severe winters, a large proportion of sagebrush may be snow covered and unavailable for roosting or foraging. At the onset of winter, sage grouse typically move to lower elevations with greater exposure of sagebrush above the snow (Patterson 1952) and taller

¹ Endangered and Threatened Wildlife and Plants; *Endangered Status for Gunnison Sage-Grouse*; 78 Fed. Reg. 2486 (Jan. 11, 2013) at pg 2533. (hereinafter referred to as the "status proposal")

sagebrush; in the migratory populations, this movement may extend up to 160 km (Patterson 1952)."²

Based on these well established scientific findings, CSA would be opposed to any expansion of winter habitat areas into areas where sagebrush frequently is buried by significant snowfall. While a designated trail system in habitat areas would be a significant benefit for summer recreation, CSA would be vigorously opposed to any attempts to apply a designated trail restriction to these non-habitat areas for winter recreation, in an overly broad attempt to manage summer resource concerns.

2b. Seasonal habitat designations could be effective.

CSA also believes that should there be desire to designate areas that are poor quality winter habitat due to significant snowfalls in order to protect habitat from impacts in other seasons, a system of winter and summer habitat designations should be employed. These seasonal designations have been very effective in management of winter habitat areas for the benefit of many other species such as elk. While these seasonal designations have been effective for other larger species, CSA would question the basic need for designation of any heavy snow areas as habitat given the clarity of research into the winter habitat needs of the Grouse.

3. Major dispersed winter travel areas should not be impacted by the habitat listing.

As previously noted, significant snowfall that buries sagebrush renders areas unsuitable for designation as Grouse habitat. Given these well established findings CSA believes winter recreation areas are outside the habitat boundaries proposed for the Grouse, and as a result there would be minimal support for the need to designate any heavy snowfall area as grouse habitat. The conclusions of the cited Grouse researchers are supported by a wide range of other research into differences in resource impacts from summer and winter recreation.

It is well established that the range of impacts and concerns involved in dispersed winter motorized recreation in the State of Colorado are significantly different than those involved in summer recreational activities, as a result of the significant snowfalls that are common where dispersed motorized recreation occurs in Colorado. The minimal impacts

² ST Knick and JW Connolly (editors) Greater Sage Grouse; *Ecology and conservation of a landscape species and its habitats*. Studies in Avian Biology (Vol 38), Univ of California Press, Berkeley CA (2011).

to resources that result from dispersed winter recreation are frequently the basis for application of different management strategies for winter and summer recreation, as evidenced by the Forest Service's separation of summer and winter recreation for travel management purposes. Rather than provide an extensive discussion of the minimal effects that winter dispersed motorized recreation has on plants and other habitat, a copy of the American Council of Snowmobile Associations brochure entitled "Multiple use trails for winter recreation; facts and myths about snowmobiling" has been enclosed for your reference.

CSA would be very concerned if any routes that are groomed pursuant to permits would be impacted by the habitat designation, as grooming of these routes is not permitted to occur until there is sufficient snow to permit grooming. CSA believes these minimum snowfall requirements necessary for grooming are sufficient to render these areas unsuitable for Grouse habitat designations. CSA has found grooming permits are self enforcing for snowfall requirements as significant damage to grooming equipment results if it is operated without sufficient snowfall. Repair of this damage is VERY expensive and time consuming and repairs are often performed by the operator of the equipment, making the operators of these pieces of equipment very conscious of any attempt to groom in conditions where damage to the equipment could result.

4. Conclusion.

CSA supports the management and protection of endangered species on federal public lands. CSA has a long history of participating in the management of endangered species on public lands and this experience has taught the Organization that significant benefits for any endangered species can be obtained without incurring major negative impacts to the significant economic contributions that are provided to the Colorado economy from dispersed motorized recreation. These contributions are critical to the basic survival of many of the small communities that are in areas to be designated habitat, as more traditional economic contributors, such as timber and oil have been lost in these communities.

It has also been CSA's experience that minimizing economic impacts from endangered species management contributes significantly to the generation of private support for the management of the species. Private support of management will also be critical in effectively addressing the wide range of activities that are impacting the Grouse.

CSA believes the research is clear regarding the poor quality of habitat for grouse in areas of heavy snowfall. This research allows CSA to conclude habitat designations should not impact most areas where dispersed winter motorized recreation is occurring. CSA is very concerned about the need to provide management flexibility in the management standards to allow continued use of connector type routes from small municipalities to areas of sufficient snowfall to provide opportunities for dispersed motorized recreation.

Sincerely,

A handwritten signature in black ink that reads "Randall L. Miller". The signature is written in a cursive style with a clear, legible font.

Randall Miller- President
Colorado Snowmobile Association

Scott Jones, Esq.- Vice President
Colorado Snowmobile Association

Enc.