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April 18, 2013

Mr. Wally Erickson
Colorado Division of Reclamation, Mining and Safety
691 County Road 233, Suite A2
Durango, CO 81301

Durango Field Office
Division of Reclamation,
Mining and Safety

Dear Mr. Erickson,

Thank you for the opportunity to comment on Rocky Mountain Aggregate and Construction LLC's proposed gravel pit, concrete, and asphalt-producing batch plants on: a tract of land located within the Eastern portion of Section 27, Northeast portion of Section 34, and the Southwest portion of Section 26, all in T48N, R9W of the N.M.P.M., Montrose County, State of Colorado.

To provide some background, I have a B.S. in Natural Resources from The Ohio State University. I have worked for the U.S. Forest Service, The Nature Conservancy, state and county parks, and am the author of *Southern Rocky Mountain Wildflowers* by Falcon Press.

While these are my personal comments, you may want to know that I am the coordinator of the San Miguel Basin Gunnison Sage-grouse Working Group. I've held this position since 2006. The Working Group is comprised of staff from agencies such as the BLM, Forest Service, Colorado Division of Parks and Wildlife, and environmental groups as well as ranchers, businesses, university professors, landowners, and interested citizens. The goal of the group is: *To work together and coordinate efforts to ensure a thriving population of Gunnison sage-grouse in a healthy, conserved sagebrush ecosystem while helping to ensure a sustainable community in the San Miguel Basin, CO.*

This site is located within proposed critical habitat for the Gunnison sage-grouse (GuSG). The grouse was proposed to be listed as an endangered species in January by the U.S. Fish and Wildlife Service (FWS), and the final rule is due by September 30, 2013.

The proposed site for the gravel pit is very close to a historic grouse courtship ground (called a lek). Leks are arguably the most critical part of grouse habitat, and grouse are sensitive to noise and activity near leks. The noise from trucks is particularly disturbing to males on leks (Hicks, et al., 2011).

At the 28th Western Agencies Sage and Columbian Sharp-tailed Grouse Workshop, Dr. Gail Patricelli spoke on the impacts of noise on greater sage-grouse (which are very similar to GuSG). Dr. Patricelli's research found, "that noise caused significant declines in male attendance at leks

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(73% decline from road noise, as compared to control leks). We also found impacts on individual males who remained at noise-playback leks, with elevated stress hormones indicating chronic stress and changes in display behavior consistent with an impact from acoustic masking."

Dr. Patricelli stated that 49 db(A) is too loud for grouse, and it is our understanding that the noise level proposed for the gravel pit could go up to 50 db(A). Dr. Patricelli stated that for grouse the undisturbed ambient level is likely to be at 20-24 db(A) or less. She recommended that stipulations shouldn't allow noise to be over 10 db(A) above ambient levels.

Even though grouse haven't been spotted on this lek in recent years, it may be an area where biologists would like to reintroduce grouse in the future. In addition, it could be possible that grouse are in the area, but haven't been seen by biologists. In addition, this habitat could provide connectivity between various subpopulations of Gunnison sage-grouse, a factor that the FWS stated was important in their proposed rule.

If this gravel pit is denied, I believe the state of Colorado would be showing the Fish and Wildlife Service that they are willing to do what's necessary to protect the grouse and its habitat. This would show the FWS that state agencies can be trusted, and the FWS doesn't necessarily have to come in to ensure that this type of development doesn't occur in grouse habitat. On the other hand, if this permit is approved, it shows the FWS that the grouse really does need endangered species protection at a federal level.

For these reasons I would strongly recommend that this gravel pit, etc. be denied. Thank you for your consideration.

Sincerely,



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