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Grand Mesa, Uncompahgre and Gunnison National Forests

Attn: Plan Revision Team

2250 South Main Street

Delta, CO 81416

July 23, 2019

Plan Revision Team,

RMBL has advocated for a special management area around Gothic, reflecting our 90+ year history of research and education in the area, large private and public capital investment that depends upon access to federal lands, willingness and motivation to support public outreach programs, and demonstrated effectiveness at working with a wide range of stakeholder groups. The intent would be to support RMBL's large investment in research and education, maintain current recreation, ensure the viability of ranching, and evaluate future decisions in terms of their impact on research, education, and interpretation.

Boundaries

Below I have included a map of potential boundaries for the area. We will follow up with a shape file that nails down exact boundaries. Given the complicated nature of Brush Creek and the range of stakeholder interests, we would recommend using Perry Creek as the southern boundary. We have used the wilderness boundary to the east.

We suggested the Snodgrass ridgeline as the western boundary. CBMR currently has a special use permit and we do not want to create any complications for that permit; they clearly have priority. However, we are uncertain about their plans. For this reason we recommend including this area within the SMU with management guidelines that give CBMR clear priority within their existing special use permit on Snodgrass, or adjusting the boundaries to exclude their permit area from the SMA. We are supportive of either approach.

We have kept the North boundary within the GMUG, and bumped out the west boundary a bit to capture an extensive research area on Cinnamon.

Management Guidelines

If the USFS decides to move ahead with an SMA, here are some suggestions for what management guidelines might look like.

1. Encourage scientific research, education, and interpretation by the RMBL within the SMA, subject to valid existing rights and maintaining consistency with all relevant laws, including but not limited to the National Forest Management Act of 1976 and NEPA.
2. We would request that new recreational activities, infrastructure, including road and bathrooms, and management activities (e.g., logging), be evaluated in terms of their impact on research, education, and interpretation. Impacts on research, education, and interpretation would not be the sole criteria for making decisions, but would be a major consideration. Protecting long-term research projects (e.g., 10+ years) would ideally be a priority.
3. Because of the heavy research, education, and outreach use within the SMA, we recommend that all research, education, and outreach activities within the SMA be coordinated through RMBL (though maintaining all existing special use permits).
4. RMBL would strongly prefer guidelines that prioritize maintaining the viability of ranching, both now and into the future. There are several ranching operations in the East River Valley and they are valued neighbors. We would like to make certain that any SMA is implemented in a way that does not create additional problems or headaches for them, including maintaining flexibility to support ranching in the future in ways that may not be currently possible to anticipate.
5. We would like to see existing recreational uses (e.g., trails, hiking, mountain biking, hunting) maintained. We would also be supportive of a parallel hike/bike trail between Mt. CB and Gothic as a mechanism to encourage non-motorized transport into the valley.
6. We recommend that the SMA be supportive of land ownership adjustments that support CBMR's operations, the use of North Village as an organizing portal for recreation/access, ranching, the Town of Mt. CB, and the Mt. CB Water and Sanitation District needs. Beyond those entities, we would suggest that any additional land ownership adjustments within the SMA have a positive nexus to improving research, education, and interpretation.
7. If possible, we would like to see lands within the SMA be withdrawn from location, entry and patent under the US mining laws and from disposition under all laws associated with mineral and geothermal leasing.
8. We recommend that the District Ranger continue to be the line officer for the SMA.
9. It is important to us that the SMA not change, either prioritize or deprioritize, research happening on RMBL's permits outside the SMA.

Thanks for considering our feedback! We would be happy to clarify or discuss any of these points.

Sincerely,

A handwritten signature in black ink that reads "Ian Billick". The signature is written in a cursive, slightly slanted style.

Ian Billick, PhD
Executive Director

