

Data Submitted (UTC 11): 8/15/2019 6:00:00 AM

First name: Jeff

Last name: Derry

Organization: Center for Snow and Avalanche Studies

Title:

Comments: Re: Center for Snow: Comments and Considerations

Hi Brittany,

Me and our Board talked with Ian today about my inquiry about a special designation at Senator Beck Study Basin. After learning more, I understand what you are saying, we should just drop the request altogether. We appreciate the GMUG Forest hosting us, we have a great relationship, the study site is not in any real imminent danger (just fears about expanded recreation), best to keep things the way they are.

Take care - Jeff Derry

Jeff Derry - Exec. Dir.

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On Mon, Aug 12, 2019 at 9:59 AM FS-gmugforestplan <SM.FS.gmugplanning@usda.gov> wrote:

Good morning Jeff,

Awesome, glad I could be of help! I know this stuff can seem arcane and wonky, so I hope you'll feel free to reach out if anything needs clarification! And that's an awesome coincidence that you'll see Ian this week, I think he's been thinking about this too so I hope you guys will be able to share and discuss advantages/disadvantages of the different designations. Again, please feel free to reach out if you need anything, and I hope you have an awesome week!

Thank you,

Brittany

Brittany Duffy

Assistant Forest Planner

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Caring for the land and serving people

From: Jeff Derry [mailto:jderry@snowstudies.org]

Sent: Thursday, August 8, 2019 9:29 AM

To: FS-gmugforestplan <SM.FS.gmugplanning@usda.gov>;

Cc: jderry@snowstudies.org

Subject: Re: Center for Snow: Comments and Considerations

Hi Brittany,

Thank you very much for replying and for the valuable information. Very much appreciated. Getting my head around the specifics of different designations of course would be a good thing for me to do. I will read the RNA's like you mentioned. And, as luck would have it, Ian Billick will be attending our Board meeting next week, I will be sure to drill him for information. After which I might make contact with the GMUG Planners again.

Take Care,

Jeff Derry

Jeff Derry - Exec. Dir.

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On Thu, Aug 8, 2019 at 7:54 AM FS-gmugforestplan <SM.FS.gmugplanning@usda.gov> wrote:

Good morning Jeff,

Thank you for your continued interest in plan revision! Your thoughtful feedback is much appreciated, and will be taken into consideration by the team as we work to improve the draft plan and develop alternatives. I will upload your letter to the public reading room, where you can also review feedback sent in by other interested community members like yourself.

As I think you might have discussed with Carol Howe way back in 2017 during the assessment phase, I did just

want to note that research natural areas are somewhat restrictive in the kind of studies and infrastructure that are permitted, as they are really intended as somewhat of a natural baseline for comparison. You might have already read them, but if you haven't, the directives guiding management for RNAs might be helpful to check out (please see attached, particularly section 4063.3-4063.33). I think Carol had spoken to you about other possible designations, such as a special interest area (as you mentioned), which might be more conducive for the type of research that occurs in the basin. I also wonder if you'd be interested in reaching out to Ian Billick or one of the other scientists at the Rocky Mountain Biological Lab, as they conduct some of their research in the Gothic Research Natural Area, just to hear their perspective on the designation? My apologies for being so forward, I just know that these planning terms can be somewhat wonky and want to make sure you have the full picture. Please let me know if you have any other input, questions, or concerns, and I hope you're having an awesome morning!

Thank you,

Brittany

Brittany Duffy

Assistant Forest Planner

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Caring for the land and serving people

From: Jeff Derry [mailto:jderry@snowstudies.org]

Sent: Wednesday, August 7, 2019 1:18 PM

To: FS-gmugforestplan <SM.FS.gmugplanning@usda.gov>; Staley, Samantha J -FS
<samantha.j.staley@usda.gov>;

Subject: Center for Snow: Comments and Considerations

Greetings,

Apologies for the late submission.

This comment is regarding winterized travel near Red Mountain Pass. I am the Director of Center for Snow and Avalanche Studies, based out of Silverton, CO. We maintain a Special Use Permit with the Forest Service to operate the Senator Beck Study Basin (SBSB). This is a very important study basin for snow scientists to conduct research and to monitor the effects of dust-on-snow, snowpack, and climate. Please see our websites to learn more about what we do in the Basin and the wealth of knowledge coming out of the Basin.

www.snowstudies.org and www.codos.org/#codos. Based on my understanding, motorized winter travel is allowed in SBSB, either as "Open Travel" or "Designated Route Only" travel. The portion deemed "Designated Route Only" is in terrain inhospitable to motorized activities, and to my knowledge there are no routes to follow, taken together is likely why I have not seen snowmobile activity in this area of SBSB. The portion designated "Open Travel" is adjacent to Highway 550 and extends into SBSB, so if someone wished they could operate motorized vehicles in SBSB in winter. Please see attached maps. Winter motorized activity in SBSB would be detrimental to the science and monitoring taking place in SBSB, for reasons ranging from disturbing the snow surface to contaminating snow chemistry samples. May I submit a request that winter motorized activity be prohibited starting at Highway 550 and extending up to Trico Peak, Peak 13,510', and Telluride Peak? And bounded to the south by the Red Mountain Pass delineation, and far enough north on Highway 550 to prevent motorized vehicles entering SBSB? The area is not conducive to motorized travel anyways, but with the development of lighter, more powerful and mobile machinery, there is potential it could become a recreation destination for this activity. Please feel free to contact me should you need more detailed explanation of the potential problem and justification to prohibit winter motorized activity in this area.

Second comment (request). In the preliminary stages of the Forest Review, I requested that the entire Senator Beck Study Basin be designated a Research Natural Area. I would like to reiterate, or re-submit, this request. The entire Basin is of high value for scientific research and monitoring (much like the Gothic RNA), both in

summer and winter. In summer we perform a periodic plant survey across the Basin and occasionally host biologist and/or ecologist field research, an RNA designation would encourage even more long-term summer research. In winter our investigation of the snowpack extends throughout the entire Basin.

It is appropriate to designate the entire Basin as a Research Natural Area, but at the very least our two main study plots, Senator Beck Study Plot, and the Swamp Angel Study Plot (where the meteorological stations are located), are worthy of the Research Natural Area designation. Please see attached map for the general location of the two Study Plot locations. I can give coordinates if needed.

If designation of the entire SBSB as a Research Natural Area is not feasible, what is the feasibility of the Basin being designated a Special Interest Area? For either designation, I feel understandings can be reached; for example, sheep herders have already agreed (to my knowledge) to just pass through SBSB in day occupancy between Prospect Basin and terrain to the north of SBSB. The exclusion of sheep in SBSB is desirable, but likely not detrimental in this capacity. And most definitely does not disturb climate monitoring.

Since 2003 we have been collecting crucial information about this high elevation mountain environment along with intense meteorological and snowpack monitoring. There is no place in North America (that I am aware) that collects the data we are collecting in the type of environment we are collecting it. If there is anyway we can secure it's future, it would be very desirable for the benefit of all.

Thank you for your consideration,

Jeff Derry

Jeff Derry - Exec. Dir.

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