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Plan Revision Team,

Representing the Rocky Mountain Biological Laboratory, I appreciate the opportunity to comment on the latest draft of the Forest Plan. I have grouped my comments into major and minor.

Major

1. We strongly support of the Gunnison Research Special Interest Area listed in Table 19 and on page 91 in Alternative B, as well as the similar interest area identified in Alternative D. A research area in support of research and education leveraging RMBL's 90+ year presence in the area has had strong support since plan revision talks started over 15 years ago. With the emphasis by the USFS in leveraging collaborations with partners, this SIA makes a great deal of sense, especially as it supports the science needed to maintain ecological sustainability, both within the GMUG but also globally. By encouraging research and education on public lands through RMBL, it is effectively leveraging tens of millions of dollars of federal, state, and private support around critical issues, including environmental literacy, climate change, water, biodiversity, and ecosystem functioning. This proposed SIA accurately captures the area's distinctive role and how it can contribute to public benefit within the context of the broader landscape.

2. While we see no conflict between the proposed SIA and ranching, we emphasize RMBL's continued support for traditional ranching operations in the valley, consistent with the Plan's identification of the GMUG as a significant rangeland resource for grazing. The local ranching operations have been strong ecological stewards of the landscape, as well as important general contributors to the larger community, and we want to encourage the continued viability of these ranching operations, especially in the light of increasing recreational pressures.

3. Is inclusion of the road through Gothic as a scenic byway consistent with current research and education uses, which include the deployment of research equipment? Will inclusion run into conflict with the intended purpose of creating an SIA for this area? Given the considerable private property inholdings dedicated to research and education with associated visual impacts, should this area be removed as a scenic byway?

4. We would encourage land conveyance strategies that actively support conveyance of public land to non-federal ownership for the purpose of achieving larger community objectives that align with USFS objectives, such as improving infrastructure supporting public access to federal lands, including parking, mass transit, access and public interpretation. In particular we note that such action may be necessary for the winter trailhead to Gothic, now that the Town of Mt. Crested Butte no longer supports overnight parking during winter and is actively removing options to work with private landowners in vicinity to the trailhead. On page pg. 54, possible language is "Parcels that will serve a greater need if owned by a county, city, and/or qualified NGO, or managed by another federal agency, including in support of the development of affordable housing, mass transit, public access, and public interpretation."

5. We recommend removing the Gothic Research Natural Area as an RNA and inclusion in the SIA. Alternatively,

could the USFS articulate how the RNA has contributed positively to USFS objectives since it was created? Given how the USFS effectively excludes much of what would be considered modern research, and the proximity of large amounts of wilderness that already serve to establish baseline conditions for similar ecosystems, what value is the RNA serving?

6. Given the intensity of public use of the lands surrounding Crested Butte and the struggles to manage those uses, should special events be curtailed? Is it appropriate to have mountain bike races in proximity to Crested Butte and other populated regions, on steep trails (e.g., the Upper Loop) where bikers struggle to control descents and are potential threats to other users? Or if the USFS is going to approve races on such terrain, should the trails be closed to other users to avoid accidents?

7. On pg 81 for Wilderness and Areas Where Natural Processes Dominate, we recommend inclusion of a Desired Condition that, constrained by legislation by also in support of the enabling legislation, research in wilderness be encouraged, improving transparency and consistency of management in wilderness areas, with recognition that research in wilderness areas can provide significant benefits to management and maintenance of wilderness, even when such benefits are not immediately apparent. On Table 18, pg. 84 we recommend that following congressional intent, wilderness objectives be expanded beyond being defined solely in terms of serving human recreational needs.

Minor

1. There are many references to partnerships and education. Given the proposed Gunnison Research Special Interest Area, would it make sense to explicitly include as a special area objective or desired condition, to establish a collaborative plan around education and research with RMBL? Great strides have been made in establishing a transparent and consistent process for managing research and education, but there are still opportunities, especially around interpretive opportunities for the public and management of wilderness in research. We appreciate and support inclusion of science and education in desired condition FW-DC-SDEC-1 (and FW-DC-EDU-1 as well as Riparian Management Zones and Ground-Water Dependent Ecosystems given the investment by DOE in Gunnison-based water research), which further supports the potential for a more explicit collaboration with RMBL within the SIA.

2. On pg. 47 there is a reference to permitting energy and mining activities in a timely fashion. Would it make sense to include a similar directive for processing applications for research and education, given that these are typically federally funded initiatives, or initiatives achieving federal priorities?

3. Pg. 28, the reference on pollination/no apiaries should be to LSU-06 and not LSU-08.

4. On pg. 31 we would appreciate a clearer definition of ground-based equipment. We understand and support the intent to protect the boreal toad, but ground-based equipment could easily be interpreted as broadly excluding research equipment, regardless of the impact on boreal toads. Given the size of the exclusion area, this could negatively impact important research to no advantage. The responses we have received to requests for clarification indicate that the intent is for large equipment (e.g., equipment associated with timber harvesting, equipment lifted into place by crane or helicopter). However, there is nothing in the proposed language that clarifies such intent. Further, while there may be a perceived risk of making a wrong decision and approving equipment that should not be perceived, there can be no perceived risk to wrong denying research. Given the time it can take to do a careful evaluation, the easiest thing to do is simply to deny the request on the basis of a very broad, and unneeded, interpretation of equipment.

5. If you haven't already incorporated it, on page 13, Table 1, you might want to consider updating fire return intervals based upon recently released research:

Higuera, Shuman, and Wolf. 2021. Rocky Mountain subalpine forests now burning more than any time in recent millennia. PNAS. June 22, 2021.

<https://doi.org/10.1073/pnas.2103135118>
PNAS June 22, 2021 118 (25) e2103135118.

There is clear evidence of dramatically reduced fire interval times, which will have significant impacts on management and public use.

6. On pg. 60 (FW-DC-REC-01), should this be modified to indicate that access to people with disabilities should be provided when such actions are not in conflict with other management values such as ecological integrity? For example, vehicular access would not be appropriate in wilderness areas to ensure access.

7. On pg. 60 (FW-DC-REC-02) maybe "Recreation is managed to achieve a sustainable balance with other resources (e.g., recreation and wildlife habitat; research and education; recreation and vegetation management....)"

8. Pg. 62, FW-GDL-REC-12: should research/education be an exemption, at least in RMBL management area? Perhaps "To reduce the impacts... Exemptions are allowed for administrative, emergency, law enforcement, wildlife habitat improvement and vegetation management activities, and for valuable research activities in areas prioritized for management of research."

9. On pg. 305, we are unaware of a reservoir associated with Copper Lake. Is there really evidence of such a reservoir, or is that an artifact of aerial mapping (maybe extensive beaver dams?)?

10. On pg. 56, for special use requests, perhaps "(i.e. public access; a reliable supply of electricity, natural gas, or water; a communication network and/or broadband; research informing management of USFS lands and/or national science priorities).

11. On pg. 78 under transportation system, perhaps a desired condition that encourages/supports implementation of mass transit systems in areas of the USFS with unsustainable volumes of private vehicular use.

12. On pg. 101 in monitoring, we suggest language acknowledging the rapid revolution in sensor, mapping, and big data technologies that are transforming our capacity to monitor landscapes, and supporting integration of these technologies into monitoring programs, reducing monitoring costs while improving monitoring effectiveness.

13. On pg. 239, Table 51, I have photo documentation (available upon request) of Boreal Toads on public lands from 2020 and 2018.

14. On pg. 256, Table 53, for the western bumblebee (*Bombus occidentalis*) there are regular observations. Here is an excerpt from a RMBL report dated 2017. Annual survey data continues to be collected so more recent information is available if desired.

"Local Distribution and Abundance of *B. occidentalis*

Pollination biologists at RMBL have been studying native bees and the plants they pollinate since the 1940s. Over the past few decades, *B. occidentalis* has been found in open meadows in at least three valleys in the northern part of the Gunnison District, typically at elevations 9500'-10,000'. *B. occidentalis* also has been observed in the adjoining White River National Forest, in the Aspen-Sopris District.

Gunnison District Sites.

1. East River Valley. *B. occidentalis* has been observed south of the Gothic townsite, in the vicinity of the Kettle Ponds and Deer Creek Trail and as far south as Brush Creek Road. It is frequently observed in the Gothic townsite, and it has also been observed north of the Gothic townsite, with the highest elevation sites about

halfway up Bellview Mtn. and near Schofield Pass.

2. Slate River Valley. One research team has observed *B. occidentalis* in the Slate River valley over the years dating from 2004 to the present, from the base of the road where it splits from the Gothic Road up into Poverty Gulch.

3. Kebler Pass area. In 2015, a RMBL scientist observed at least one worker and in 2017, one queen in Irwin, CO, elevation 10,300 feet. Another scientist also observed *B. occidentalis* in the Kebler Pass area (along the public road to Irwin lake) in 2014 and 2015.

Bombus occidentalis is not a common bee, but it is present every year in small to moderate numbers. In 2014, one research group observed 1474 bumblebees in the East River Valley. Eight of the 1474 (0.5%) bumble bees were *Bombus occidentalis*. Another RMBL scientist observed bumble bees in the East River Valley for approximately 100 hours/summer in each of 2015, 2016 and 2017. During that time, she observed nearly 10,000 bumble bees, 79 of which were *Bombus occidentalis* (0.2% in 2015, 0.7% in 2016, and 1.7% in 2017).

The following quotes from RMBL scientists, dating from 2015 and 2017, are useful for illustrating the abundance and distribution of *Bombus occidentalis*.

"I agree that *occidentalis* is a rare bee. These data are from a three year project in which I have observed all bumble bee species at six sites in the East River Valley at weekly intervals from snowmelt until the last flowers in September. *Bombus occidentalis* is present in very small numbers in all years (but not at all sites in the valley). These are the numbers I have seen each year:

2015: 9 *B. occidentalis* (6 queens, 3 workers, 0 males) of 4007 total bees during 122 observation hours (0.2% of bees).

2016: 18 *B. occidentalis* (7 queens, 6 workers, 5 males) of 2727 total bees during 98 observation hours (0.7% of bees).

2017: 52 *B. occidentalis* (5 queens, 23 workers, 24 males) of 3107 total bees during 97 observation hours (1.7% of bees).

In closing, RMBL appreciates the opportunity to comment on the Forest Plan Revision. We appreciate the careful thought that has been put into soliciting feedback as well as the document. If you have any questions about my comments, please do not hesitate to reach out. As a nonprofit dedication to supporting research benefitting the Gunnison Basin, and as a recipient of considerable federal funding, we look forward to future collaborations with the USFS in support of the agency's mission.