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First name: Ian
Last name: Billick
Organization: RMBL
Title: Executive Director
Comments: Plan Revision Team,

Representing the Rocky Mountain Biological Laboratory, I appreciate the opportunity to comment on the latest draft of the Forest Plan. In the comments in early October, we posed the question:

"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?"

Having sought clarification from the plan revision team, we remain concerned that inclusion of the corridor from Mt. Crested Butte to Schofield Pass as a scenic byway will create problems for research and education. We make six points.

1. The corridor currently has considerable research equipment on privately owned property and as such, may not qualify. Photo 1 shows an example of existing research infrastructure on RMBL property as an example.

2. This corridor currently has considerable research equipment on USFS lands. As an example we had open top chambers, which are used to experimentally warm plots, in the Gothic Research Natural Area directly in the view corridor of people driving on the road. Currently we have a flux tower placed just south of the Avery Bridge (Photo 2).

3. These installations are a critical part of the nation's scientific infrastructure addressing issues around water, climate change, and biodiversity with local and national benefits. Furthermore, they leverage hundreds of millions of dollars of research investment in the valley and because they are embedded in almost a century of research in this location involve generation of insights that cannot be replicated simply by siting equipment in other valleys. Additionally, scientific objectives, logistical needs and site considerations, often constrain placement of equipment, limiting the ability to mitigate visual impacts by moving equipment to close by locations.

4. While we have a great working relationship with the USFS, we do experience regular turnover. In the absence of well-defined expectations, decision-making can be arbitrary and lack consistency. For example, we have experienced challenges in consistent decision-making involving research in wilderness areas. While there has been general agreement that the issue needs to be addressed, we have struggled to make progress.

5. In alternatives B and D the USFS has proposed creating a research and education area. We worry that establishing the corridor as a scenic byway will lead to management inconsistent with that designation, undercutting management flexibility as the nation's scientific and ecosystem needs change.

6. If you consider the USFS lands as a portfolio that accommodates multiple uses but accepting that not every use will be compatible in every location, the research use of this corridor (and adjacent corridors) cannot be replaced or replicated elsewhere, whereas the USFS has plenty of opportunities to provide high quality visual experiences elsewhere.

If there is interest in retaining some kind of scenic protection for the corridor, we encourage the planning team to consider options such as exempting research activities or requiring research activities to make all reasonable efforts to reduce visual impacts but making it clear that visual impacts of research is not a grounds for denial, nor

should visual impact mitigation make a project financially infeasible.