USFS GMUG Forest Plan Revision

Forest Assessments: Integrity and System Drivers and Stressors

Comments

by

James O. Cochran

for

Gunnison County

1. Page 25, sagebrush shrubland: Note that black sagebrush also occurs on dry, rocky slopes, generally of southwest to southeast aspects. Because this is an important food source for wintering Gunnison sage-grouse, verifying occurrence and identifying forest-specific management options is essential to this planning process for this component of the sagebrush ecosystem.

2. Page 63, Sagebrush: This discussion appears to indicate that the current condition of the sagebrush ecosystem on the GMUG is not of the desired condition to support the Gunnison sage-grouse (GuSG). In the Gunnison Basin much of the sagebrush ecosystem on USFS managed lands meets the habitat guidelines as outlined in the Gunnison Sage-grouse Rangewide Conservation Plan (2005). Gunnison County recommends that the USFS manage the sagebrush ecosystem within the range of the GuSG to meet these guidelines to help ensure the continued persistence of that species.

3. Sagebrush: We believe it is important to note that though the USFS does not manage a large area of the sagebrush ecosystem that supports Gunnison sage-grouse, those areas of this ecosystem that it does manage are of significant importance to this species and should (continue) to be a conservation and management priority under a revised forest plan.

4. Page 94, 10.: Gunnison County recommends the following change to what appear to be current regulations regarding the use of weed-free forage in wilderness areas: Require user camping overnight with ~~recreational~~ livestock to carry and use cubed, pelleted, or rolled feed and/or certified weed-free hay where grazing is prohibited.

   Non-recreational (commercial, grazing permittees, etc.) should not be excluded from the requirement to utilize only weed-free livestock food sources in wilderness areas. We are unclear as to whether the weed-free forage requirement extends onto all USFS managed lands. It is our recommendation that it should, considering the issues with weeds on public lands, particularly in the context of Gunnison sage-grouse.

USFS GMUG Forest Plan Revision

Forest Assessments: Identifying and Assessing At-risk Species

Comments

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James O. Cochran

for

Gunnison County

1. Page 13: The understory of healthy sagebrush shrub-lands includes not only bunch and sod grasses but a forb component as well.

2. Page 14: Another common weed transmission vector is motorized equipment, particularly tracked equipment such as dozers and excavators. The Gunnison Basin Gunnison sage-grouse Candidate Conservation Agreement (CCA) on Federal Lands (2013) includes protocols for cleaning equipment and specific vector management procedures, such as road grading prescriptions to reduce the transmission of non-natives (weeds).

3. Pages 71-72: The discussion of Forest Plan consistency with external plans for wildlife and other species stops at the State level. There is no discussion or consideration of local government plans that have area within or near the GMUG. A number of counties have plans that address wildlife and other species that should be taken into consideration by the USFS in this process. Examples include Gunnison County's wildlife section (11-106) of the Gunnison County Land Use Resolution (LUR), Montrose County's Gunnison sage-grouse development regulations, and the wildlife section of the Saguache County Land Development Code.

4. Pages 94-100: Though mentioned in the body of this document the Gunnison Basin, Gunnison sage-grouse Candidate Conservation Agreement (CCA) is not mentioned at all in Appendix 1, Gunnison sage-grouse. This document, developed with the USFS, which is signatory to it, should be of primary guidance in managing GuSG habitat within the Gunnison Basin on USFS managed lands. It includes cross-jurisdictional boundary management prescriptions for domestic livestock (cattle) grazing, weed control, and other landscape scale conservation actions of benefit to the GuSG. It is Gunnison County's recommendation that the CCA be formally adopted into the GMUG Forest Plan.

USFS GMUG Forest Plan Revision
Species Status Assessment
Terrestrial Species
Comments
by
James O. Cochran

1. Black-footed ferret: No. 7, page 3: It is unlikely that recreational shooting is a direct risk to Black-footed ferrets as the species is protected under the ESA and by State law. It is likely that the USFS (and by reference, the USFWS) is referring to recreational shooting of prairie dogs, an important food source for this species, as being an indirect threat to this species.

2. General Note: There is a repetitive discrepancy throughout this assessment under #2, Status, for many species between "NatureServe" and the CNHP status definition. For many species "NatureServe" finds that a species is "secure" while the CNHP finds that the same species is "imperiled". An example is the Boreal Owl. We suggest that an explanation of why this is occurring and what the USFS intends to do with this seemingly conflicting information would be helpful.

3. Canada Lynx: It is our understanding that the USFWS has completed a Species Status Assessment (SSA) for this species. That document should contain the most current information for this species. Accordingly it should be referenced in the USFS Species Status Assessment. The USFS should explain the difference in these two like-named documents as an introduction to its Species Status Assessment.

4. Gunnison sage-grouse:

    a. The listing of the Gunnison sage-grouse (GuSG) as threatened by the USFWS in 2014 is being litigated. Gunnison County cautions the USFS that using information from the litigated decision may result in invalidation of all or part of the planning process/outcome (GMUG Forest Plan Revision) for this species. Though USFS managed lands comprise a relatively small portion of GuSG habitat across the range of the species, the GuSG habitat it does manage is important to the species. Therefore we urge the USFS to use the best information available for this species, not just relying on the 2014 listing document. (have David review this)
    b. Though Colorado Parks and Wildlife (CPW) has provided, in recent years, "high female counts" in its annual lek reports for the Gunnison Basin, we caution the USFS that counting GuSG females is difficult at best (they do not display; they are dependent upon camouflage for survival) and therefore the data is interesting but questionable and should not be used in this Assessment.

c. On page 4, the discussion of "known leks" should provide the reference (including date) for this information. The status of leks does change and it is helpful in knowing what the baseline was for the statements made.
d. The USFWS is developing its own Species Status Assessment (SSA) for this species. It is our understanding that they are not using the threat analysis in their 2014 listing decision in developing that document. Though there are likely overlaps between the threat analysis being used for the USFWS SSA and the threats identified in the 2014 GuSG listing decision, we are aware of differences. We also note that the threats identified in the GuSG Rangewide Conservation Plan (GuSG RCP) differ in notable areas from those threats identified in the 2014 listing decision. We recommend that the USFS use the best available, most current threat information for the GuSG to best configure conservation actions within the GMUG Forest Plan Revision.
e. We note that recreation and special use permit activities not only have the …"potential to serve as vectors for weed transmission and expansion…" but also have the potential to impact GuSG through direct disturbance and to reduce the quality of GuSG habitat through that same actual physical disturbance. Examples include repetitive travel, noise, and loose pets traveling with recreationists.
f. Gunnison County notes that in the discussion/assessment of the GuSG there is not mention of the GuSG Gunnison Basin Candidate Conservation Agreement (CCA) on federal lands, which the USFS is signatory to. This key GuSG agreement should have a significant impact on how the USFS manages GuSG habitat. We recommend it be reviewed and incorporated into the GuSG component of this Species Status Assessment.

5. <u>Gunnison's Prairie Dog:</u>
   a. Gunnison County notes that the USFWS, in a stipulated settlement, agreed to submit a "new" 12-month finding on this species, which it did in 2013, effectively negating the 2008 finding. The USFS should use the most current information available regarding ESA listing status, which is contained in the 2013 finding. (have David review this)
   b. At 3. "Taxonomy", we note that that USFWS, in its 2013 Finding, determined that the best available science showed that the Gunnison's prairie dog (GPD) could be differentiated into two subspecies: *Cynomys gunnisoni gunnisoni* (which is generally found in the montane portions of the range of the species) and *Cynomys Gunnisoni zuniensis* which is generally found in the prairie portion of the species' range. We recommend that the USFS update its taxonomic information accordingly.

6. <u>White-tailed Ptarmigan:</u> Colorado Parks and Wildlife (CPW) has more recent information on this species than that noted in this section. We suggest the USFS review the following and incorporate information as appropriate:

   White-tailed ptarmigan 2012-2013 progress report. Seglund, A.E. and P. Street. CPW 35pp.

   White-tailed ptarmigan summary report 2011 and project proposal

2012-2014. Seglund A.E. CPW 19pps. Reports outline monitoring using occupancy and mark resight techniques.