

USFS GMUG Forest Plan Revision
Species Status Assessment
Terrestrial Species
Comments
by
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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.
 - 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. Gunnison’s Prairie Dog:
- 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.
 - 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. White-tailed Ptarmigan: 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.