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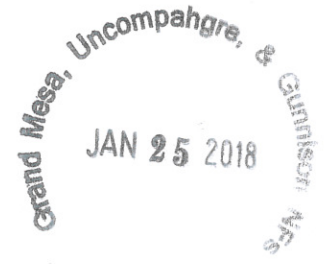


Montrose Forest Products, LLC

P.O. Box 1149, Montrose, CO 81402 T: (970) 249-0812

January 23, 2018

Mr. Scott Armentrout
GMUG NFs
2250 Highway 50
Delta, CO 81416



Dear Mr. Armentrout:

Montrose Forest Products, LLC has been very involved with forest management projects on the Grand Mesa, Uncompahgre, and Gunnison (GMUG) National Forests, including SBEADMR and others and will continue to heavily rely on timber output from the GMUG NFs into the future. Recognizing the overall importance of the GMUG NFs Forest Plan and the continued need to be involved in the process as it is revised, Montrose Forest Products would like to submit the following comments regarding the draft Identifying and Assessing At-Risk Species Assessment and draft proposed list of Species of Conservation Concern (SCCs):

According to the 2012 Planning Rule, Species of Conservation Concern are: "a species, other than federally recognized threatened, endangered, proposed, or candidate species, that is known to occur in the plan area and for which the Regional Forester has determined that the best available scientific information indicates substantial concern about the species capability to persist over the long-term in the plan area." For a complete listing of our comments for each SCC, please see the attached spreadsheet.

In general, we are very concerned, not only about the overall number of potential species of conservation concern, but also the number of species included in the Draft SCC list for which there are no known population on the GMUG (for example, the northern leopard frog, Nokomis fritillary, Townsend's big-eared bat, etc.), or for which there is no documented "substantial concern" about the species capability to persist over the long-term in the plan area (for example, American marten, Utah fescue, Crandall's rock-cress, etc.). According to FSH 1909.12, 12.52c "if there is insufficient scientific information available to conclude there is a substantial concern about a species' ability to persist in the plan area over the long term, that species cannot be identified as a species of conservation concern." Since those species don't meet the "black and white" requirements for SCCs, they should be removed from the draft list. If new information becomes available that documents a known occurrence or substantial concern about long-term persistence, then those species can be added to the list at that time.

We appreciate your consideration of these comments and suggestions as you move forward with the revision process. I would be happy to discuss these comments if you have any questions.

Sincerely,
MONTROSE FOREST PRODUCTS, LLC

A handwritten signature in black ink, appearing to read "Normand Birtcher", written over a horizontal line.

Normand Birtcher
Resource Forester

Attachment 1 to IFA			
Species	Occurrence?	Substantial Concern?	Plan Components?
			Recommendation
Northern Goshawk	Yes. 214 occurrences in the past 20 years.	No. Species is considered secure. Current trend of the population within the planning area is not identified. That falls short of 'substantial concern' threshold.	
Boreal Owl	Yes. 347 records on the forest.	No. According to overview, major threat may be indirect effects of forest harvesting practices. However, annual GMUG FY17 timber harvest acreage was only 1,449 acres, yet 1,012,631 acres have been identified as potential suitable owl habitat. This falls short of 'substantial concern' threshold.	Does not qualify for SCC.
White-tailed ptarmigan	Yes.	No. According to the overview, an estimated 160,287 acres of occupied range occurs within the planning area, representing approximately 10% of occupied range within USFS Region 2. While the distribution of white-tailed ptarmigan appears to be unchanged from historic levels, population sizes and trends are mostly unknown other than in localized areas of study. This falls short of the 'substantial concern' threshold.	Does not qualify for SCC.
Brown-capped rosy finch	Yes - although only 4 sightings in 20 years	No. The species is considered secure and has no known threats to the species. This falls short of the 'substantial concern' threshold.	Does not qualify for SCC.
Lewis's woodpecker	No. There have only been 2 sightings in the planning area in the past 20 years.	No. Species is considered secure and there have only been two sightings in the past 20 years. No abundance or trend information exists for the planning area. This falls short of the 'substantial concern' threshold.	Does not qualify for SCC.
Flammulated owl	Yes.	No. Species is considered secure and population trends for this species in the planning area have not been reported. This falls short of the 'substantial concern' threshold.	Does not qualify for SCC.
Purple Martin	Yes.	No. Species is considered secure. According to overview, they nest in mature aspen within 1,000 feet of water. However, annual GMUG FY17 timber harvest acreage in aspen was minor, yet 341,518 acres have been identified as potential suitable martin habitat. This falls short of 'substantial concern' threshold.	Does not qualify for SCC.
Brewer's sparrow	Yes.	No. Species is considered secure and the occurrence is 'numerous.' This falls short of 'substantial concern' threshold.	Does not qualify for SCC.
Bluehead sucker	Yes.	No. Species is considered secure and population trends for this species in the planning area have not been reported. This falls short of 'substantial concern' threshold.	Does not qualify for SCC.
Boreal Toad	Yes.	Yes.	Plan must contain plan components (ecological or species-specific)
Northern Leopard Frog	No. According to overview, no occurrences documented on the GMUG.	N/A	Does not qualify for SCC.
Western bumblebee	Yes - only three sites. No occurrences documented in the NRS database for planning area.	No. There are no documented occurrences and no status or trends have been identified for populations within the planning area. This falls short of 'substantial concern' threshold.	Does not qualify for SCC.

Yellow-dotted alpine butterfly	Yes.	No. Trend information is not available and the threat is unknown. This falls short of 'substantial concern' threshold.		Does not qualify for SCC.
White-veined arctic butterfly	No. Only 4 sightings in the last 20 years and none in the last 11 does not support a conclusion that the species "is established" in the area (1909.12, 12.52c-1).	N/A		Does not qualify for SCC.
Nekomis fritillary	No. One sighting 32 years ago does not support a conclusion that the species "is established" in the area (1909.12, 12.52c-1).	N/A		Does not qualify for SCC.
Townsend's big-eared bat	No. One sighting 62 years ago does not support a conclusion that the species "is established" in the area (1909.12, 12.52c-1).	N/A		Does not qualify for SCC.
Gunnison's prairie dog	Yes.	No. According to the overview, no reliable trend information is available for this species within the Upper Gunnison Basin population area. No trends have been identified for portions of this population within the planning area. This falls short of the 'substantial concern' threshold.		Does not qualify for SCC.
American marten	Yes.	No. Species is secure and population trend information for this species within the planning area is unknown. This species is considered well-distributed throughout the planning area. This fall short of the 'substantial concern' threshold.		Does not qualify for SCC.
Rocky mountain bighorn sheep				
Desert bighorn sheep				
Stonewop gilia	Yes.	No. According to the overview, there are insufficient data to make any inferences regarding the population trend for <i>Alicia sedifolia</i> . The population size of the Half Peak occurrence was estimated for the first time in 2003, and later observed again by Hogan and Tembrock in 2007. However, there have been no monitoring efforts from which a trend could be determined. It is very likely that other occurrences remain to be discovered, so more species inventory work is needed before the population trend can be accurately assessed. Further, no exists on abundance changes for the GMUG populations. Overall, based on current information, threats to <i>A. sedifolia</i> are considered relatively low. This falls short of the 'substantial concern' threshold.		Does not qualify for SCC.
House's sandwort	Yes.	No. According to the overview, based on current information, threats to <i>Minuartia macrantha</i> are considered relatively low. This falls short of the 'substantial concern' threshold.		Does not qualify for SCC.
Crandall's rock-creas	Yes.	No. Considered very common in the Gunnison Basin and the threats are considered relatively low. This falls short of the 'substantial concern' threshold.		Does not qualify for SCC.

Utah fescue	Yes.	No. Considered fairly common and "abundant" and threats are not listed. This falls short of the 'substantial concern' threshold.		Does not qualify for SCC.
Green spleenwort	Yes - but only 1 occurrence.	N/A		Does not qualify for SCC.
Gunnison milkvetch	Yes.	No. Population is stable and new sites can be discovered easily. This falls short of the 'substantial concern' threshold.		Does not qualify for SCC.
Naturita milkvetch	Yes.	No. Population is stable and threats are not listed. This falls short of the 'substantial concern' threshold.		Does not qualify for SCC.
Narrow-leaf grapefern	Yes - but only two records.	No. According to the overview information, abundance and trend on the GMUG are unknown. This falls short of the 'substantial concern' threshold.		Does not qualify for SCC.
Peculiar moonwort	Yes - but only 1 occurrence.	No. Population at the 1 site is stable, and the population and trend information on the planning area are unknown. This falls short of the 'substantial concern' threshold.		Does not qualify for SCC.
Arctic braya	Yes.	No. Current location by 4 of the 5 populations puts them at minimal risk for disturbance. This falls short of the 'substantial concern' threshold.		Does not qualify for SCC.
Alpine braya	Yes - although the 6 populations on the GMUG have not been verified in over 20 years.	No. Population verification has not been completed in over 20 years and trend information on the planning area are unknown. This falls short of the 'substantial concern' threshold.		Does not qualify for SCC.
Lesser panicled sedge	No.	No. No GMUG populations have been counted and no trend information is available. This falls short of the 'substantial concern' threshold.		Does not qualify for SCC.
Sierra hare sedge	Yes.	No. There are no population counts or trend information on the planning area. This falls short of the 'substantial concern' threshold.		Does not qualify for SCC.
Livid sedge	Yes - but only 1 record.	No. According to the overview information, population and trend information on the planning unit are unknown. This falls short of the 'substantial concern' threshold.		Does not qualify for SCC.
Globe sedge	Yes.	No. According to the overview information, population and trend information on the planning unit does not exist. There are no known threats to the species on the GMUG. Therefore, this falls short of the 'substantial concern' threshold.		Does not qualify for SCC.
Canadian single-spoke sedge	Yes.	No. Trend information on the planning unit is unknown. Threats are low. This falls short of the 'substantial concern' threshold.		Does not qualify for SCC.
Green sedge	Yes	No. Population at one site is considered "abundant" and trend information is unknown. This falls short of the 'substantial concern' threshold.		Does not qualify for SCC.
Osterhout's thistle	Yes.	No. Population and trend information on the planning unit is unknown. Threats on the GMUG are unknown. This falls short of the 'substantial concern' threshold.		Does not qualify for SCC.