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First name: Jessica

Last name: Young

Organization:

Title:

Comments: To my forest planning team and all of the GMUG personnel, I appreciate the hard work which created the working draft for the forest plan and the public process which encouraged attendance and communication between staff members and interested public parties.

I understand the importance of a plan that provides the guidance, goals and sideboards for decades of public land management decisions and actions. While I am interested in the entire plan, I will keep my comments focused on two areas as related to my background. I have studied and/or participated in public processes and conservation planning for the Gunnison Sage-grouse for 30 years. During that time, I have seen increased effort fostered on its recovery before and since its listing as a Threatened species under the ESA in 2014. I especially appreciate the leadership and work from forest service biologist Matt Vasquez in restoring degraded riparian areas on Flat Top and in surrounding areas.

My concerns with the current plan is that it provides insufficient protection for the Gunnison Sage-grouse and insufficient action and coordination among agencies in combating cheatgrass invasion, especially within the Gunnison Basin which such coordination is critical to prevent the further decline of the species. Currently, we have no accurate estimate of the amount of cheatgrass on Forest Service or other public lands in the Gunnison Basin nor do we have monitoring information on its trends in forest units. The GUSG species population estimates obtained by annual lek counts suggest that the species has declined by more than 50% since its listing as threatened and that most of the decline has occurred in the past two years. One issue of special concern is the expansion of cheatgrass given its potential to profoundly impact fire cycles and habitat conversion. The Species Status Assessment report by the USFWS acknowledges that they may have underestimated the spread and threat of cheatgrass/invasive plants in the GUSG range.

I appreciate Objective FW-PBJ-IVSP-02 and it mentioning that priority treatments for invasive species will include treatment of cheatgrass in sagebrush, particularly GUSG designated critical habitat. I encourage the objective to be strengthened with the following language "Mapping, monitoring and treatment of cheatgrass in sagebrush, particularly Gunnison sage-grouse designated habitat in collaboration and coordination with adjacent land management and agencies." I suggest similar language for Table 10 in the invasive species objectives on page 139.

Below are some thoughts and suggestions about the guidelines and objectives as they apply specifically to Gunnison Sage-grouse.

FW-GDL-SPEC-34: To maintain, improve, or enhance existing Gunnison sage-grouse habitat, surface-disturbing activities should not be permitted within 0.6 mile of a lek. While the data are limited for Gunnison Sage-grouse, Greater Sage-Grouse studies suggest that limiting such activities to 0.6 miles of a lek will not protect the species from decline. For examples effects of oil and gas developments on lek attendance were observed at a distance of up to 4 miles from the lek. Please see the Green et al. study "Investigating Impacts of Oil and Gas Development on Greater Sage-grouse" (Journal of Wildlife Management 2017) as the best available science for this issue for sage grouse and for more detail on the impacts of surface disturbance. I recommend that this guideline be adapted to be much more conservative given the threatened species decline and that surface-disturbing activities should not be permitted within 2 miles of an active lek or historic lek. I include the historic lek sites as they are important for the species expansion and recovery.

FW-GDL-SPEC-35: To minimize or avoid permanent habitat loss, ground-disturbing projects in Gunnison sage-grouse habitat should incorporate reclamation measures or design features that accelerate recovery and native

vegetation re-establishment of affected sage-grouse habitat, consistent with the best available scientific information.

A species initially proposed as endangered and only listed as threatened because of the FWS perspective of the good work of the local community should not be subjected to permanent habitat lost. With cheatgrass, extreme weather conditions, and increasing environmental variation, the concept of restoration and re-establishment of the slow growing sagebrush uplands is unrealistic. Creating the necessary mosaic of shrub age structures and reestablishing appropriate forbs and grasses in the understory takes decades. The species decline during the past few years suggests it does not have decades for such restoration efforts to reach maturity.

FW-GDL-SPEC-37: To avoid creating new perching or nesting opportunities for avian predators, development of tall structures (e.g., powerlines, communication towers, weather stations or other similar structures) within 2 miles from the perimeter of leks (active and inactive), as determined by local conditions (e.g., vegetation or topography), and within nesting and brood-rearing habitat should be avoided if there is the potential to disrupt Gunnison sage-grouse breeding, nesting, or use of an area.

FW-GDL-SPEC-39: To minimize loss of habitat connectivity within Gunnison sage-grouse habitat, for infrastructure that requires temporary or permanent access routes (i.e., utility lines, communication sites, or other comparable infrastructure), siting options should be evaluated in conjunction with proposed access routes to determine the location that would cause the least amount of habitat fragmentation. Access routes should use existing impacted areas (i.e., use existing roads). All vehicles should be washed prior to entering habitat to reduce cheatgrass distribution and cheatgrass invasion along existing routes should be reported to the USFS and Gunnison County Weed Specialists.

FW-GDL-SPEC-40: To reduce the potential for avian predation of Gunnison sage-grouse, require new authorizations and reauthorizations for infrastructure to include the most effective perch deterrents available on all powerline poles that are within nesting, and brood-rearing habitat or within line of site of lek sites.

FW-OBJ-SPEC-31: Within 5 years of plan approval, install educational signs at all pertinent kiosks, trailheads, or road access points that serve as portals to Gunnison sage-grouse habitat to request the public to leash pets when recreating and clean boots and pets of all cheatgrass seeds prior to entering the habitat.

FW-OBJ-SPEC-33: Within 2 years of plan approval, modify authorizations for all special use permits authorizing winter activities in designated critical sage-grouse habitat (including, but not limited to, those for recreation events, outfitters, and guides), to allow for management flexibility in the event of a severe winter, consistent with Species FW-GDL-SPEC-46, to include the following condition: "When severe winter conditions are identified, in order to protect Gunnison sage-grouse, the Forest Service reserves the right to will restrict permittee's travel from identified areas and/or routes, consistent with restrictions that would be placed on general public access, from approximately December 1 to March 31.

I suggest adding the words in blue to the two guidelines and objectives above.

FW-GDL-SPEC-45: To avoid disturbance to sage-grouse during the breeding season, noise resulting from management activities from March 1 to July 15 should not exceed disturbance thresholds in breeding habitat, as determined by best available scientific information.

It would be good to have them set a decibel threshold now, based on the literature and mention modifying it in the future based on the best available scientific information.

FW-GDL-SPEC-46: To minimize impact to Gunnison sage-grouse during severe winters, area travel closures should be implemented to protect identified grouse concentration areas. Closure decisions will be made in the

context of managing for multiple resources, including big-game concentrations, public recreation, and range condition, and could occur anytime from December 1 to March 31. The following criteria should be considered to determine if winter conditions warrant an area closure:

- o Snow depth
- o Temperature
- o Snow condition and consistency
- o Prior year's range condition.

I believe part of the criteria for increased winter closures should be population trends and numbers.

Monitoring questions and Indicators table pg 80.

I note that lek counts and trends are not mentioned in the indicators for the status and trend of birds on the GMUG. Such seems like a significant oversight.

Finally, I believe there should be an objective, not just a guideline, associated with the mapping, treatment and monitoring of cheatgrass in Gunnison Sage-grouse habitat and across the forest.

I appreciate the opportunity to comment on the draft plan and look forward to being part of the continued process.