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Comments: Re: GMUG DEIS Plan Revision

October 30, 2021

GMUG Planning team,

Thanks again for your work on the plan and for the opportunity to comment on it. I have been involved in this plan since the early 2000s and lived in the GMUG area from 1986 through 2018. During much of that time I was a board member and Conservation Chair for Black Canyon Audubon, Public Lands Committee member for Western Colorado Alliance, and Oversight Committee chair for the Crawford Area Gunnison Sage-grouse Working Group. I spent several years on the BLM Uncompahgre Field Office RAC Planning Subcommittee. I also spent 13 seasons working for Bird Conservancy of the Rockies (BCR) and Colorado Breeding Bird Atlas II, including including breeding bird blocks and montane owl work for the Atlas, and Breeding bird transects and Western Purple Martin studies for BCR.

Despite spending a lot of time on land management planning in the past, I am still learning the 2012 planning rule. I am basing many of my comments on the definitions of plan components; desired conditions, objectives, standards (mandatory constraints) and guidelines on pp 3 & 4. I also based some comments on the FS Handbook (FSH) 1909.12, Land Management Plan.

In general, I favor alt d because of the larger areas of Wilderness, and it's consideration of the Core Act and GPLI (beyond areas that are CRA or WMA). Most of ECO and SPEC plan components are very good. These plan components are especially important because they help protect the majority of forest that is not Wilderness, Roadless or WMA. Below are some particular comments:

P 7 I like that Ecological Sustainability is "the foundation of the plan" and "listed ahead of" other parts of the plan, but I don't know if that means it is given priority- as it should be- or is just listed first.

P 13 All of the ECO components are good, including the discussion of cycles and regimes in 01 and 02, and climate and refugia in DC-03.

P 15 ECO-05 connectivity is especially important. ECO-06 is good too. (In the table, I don't understand why Flammulated owl is listed where they don't occur but omitted on aspens, where nearly all of GMUG's flames live.)

P 17 Old forest is extremely important to wildlife, especially obligate bird species in most habitats.

P 26 SPEC-01 is very good, including the mention of native species, broader landscapes, disturbance by management activities and recreation, and common and uncommon species.

P 27 SPEC-07 Raptor nest buffers and timing is very important, and mostly good, but it isn't clear to me on two points. The CPW list does not include American Kestrels, Cooper's and Sharp-shinned Hawks, and most importantly the four montane cavity-nesting owls; Boreal, Northern Saw-whet, Northern Pygmy, and Flammulated. Flame and Boreal are Regional Sensitive Species. BLM in Utah gives buffer distances and timing dates for these species, and I'm sure other agencies or organizations do too. I don't see any rationale for omitting these raptors, especially the four owls, who are particularly sensitive to nighttime noise. So I interpret this guideline as protecting all raptors, regardless of the CPW list. And Also, to what does the mention of migratory birds refer? I assume it refers to timing limits that are typical of most birds in the habitat in question.

P28-29 SPEC-11 Snags. This is very good. But I don't understand the exception for aspens, which are the most important tree species for cavity nesting species. Does this mean they still need to be preserved, but the patch size is variable? Residual patch sizes that are smaller will often result in aspens near the perimeter blowing down even more than they already do, which defeats the purpose of leaving them. The most important aspens, those

with cavities have the additional bad habit of breaking off at the hole, in hard winds.

P 29-30 SPEC-12 and 16 Relating to habitat blocks and corridors, these are extremely important, and are very good. In fact the first two sentences about habitat blocks, and the third sentence about corridors are required, Forest wide, to make the Plan comply with FSH, ch 20, Ecological Sustainability.

P 35-38 SPECS regarding Gunnison Sage-grouse (GUSG) are good. Shed antler hunting should not be allowed in occupied GUSG range at any time, due to its intense ground disturbance.

P 93 WLDF-02 and 03 These are good, especially the mentions of connectivity and maintaining or improving low density of routes. This is one of the most important parts of the DEIS.

P 94 SMA table. There should be no new mechanized or other trails in occupied Gunnison Sage-grouse habitat in Flat Top WCA (or in any GUSG habitat).

P112-114 Monitoring question 11, SPEC-07 More monitoring for other bird species is needed, but Purple Martins and Northern Goshawks are the best choices to specifically mention, especially since GMUG has done this historically. Martins are probably the best choice for pure or climax aspens, which is the most outstanding GMUG specialty, and Goshawks are great for aspen/ spruce fir mix, and are sensitive to disturbance and loss of habitat size and connectivity.

P252, table 53, species not picked for SCC. I have a few comments regarding this table:

P252, Boreal Owl, many of the 180 records are from nest boxes, and they're not all occupied at the same points in time. This gives the incorrect impression that there are more individuals than really inhabit GMUG.

P253, Black Swift. The plan states "no evidence of restricted ecological condition." This species only nests behind waterfalls, making them among the region's most extreme examples of a species requiring very unusual and limited ecological conditions. (I spent a couple of weeks in about 2003 searching for Black Swift nests in the GMUG, with very little success. I learned that many waterfalls are not good enough habitat for them, often because they're not shady enough, and that many falls are unreliable during drought years.)

P255, Flammulated Owl. Nearly all Flams in the GMUG live in cavities in large aspens. Considering the serious declines expected to this habitat, the species must be considered in danger of a serious decline.

P255, Purple Martin. Same rationale as Flam Owl mentioned above, but even worse because they only inhabit pure or nearly pure aspen stands, and only nest near the edges. Their requirements for edges of pure aspens certainly should qualify them as having a restricted range. Also remember that the number of observed occurrences is misleading due to the tendency of roads to be near these same, uncommon locales, the short lifespan of large decaying aspens, and because of GMUG's excellent work in finding most nests.

Appendix 9, Species of Conservation Concern. I understand that most species don't check the required criteria. But I believe Purple Martins do. The only question could be if they meet #2, declining trends in population OR habitat. All of the habitat is large aspen trees near the edge of stands. I don't think you can make a case that aspens aren't declining. It is difficult to say if the population is declining due to increased searching and monitoring efforts. Regarding #3, the Western Purple Martin subspecies, *Progne subis arboricola*, have been separate from the Eastern subspecies for thousands of years and they do not overlap in their North American breeding grounds, and probably not in their wintering range. The Western subspecies has a low population, of maybe 12,000 , most of which are in the Pacific Northwest coastal areas. Our martins have a low population that at least seems to fit what USFWS calls distinct population segment. And GMUG is almost certainly the forest that has the highest number of them (at least outside of the Pacific coast). Criteria #1 is a no brainer because the threat to their only habitat in Colorado-aspens- is related to climate change. #4, restricted habitat within the plan are also fits. Remember, you can't extrapolate the number of known Martin nests along aspen edges across the total area of aspen stands. Most nests in GMUG have been found, and because of the short life span of large, decaying aspens, many nests discovered in the early 2000s are not still standing.

P. 70, table 37. I strongly agree with GMUG's statement regarding patch size that "lower elevation ecosystems with a smaller % of their area in Wilderness or CRA are likely the most departed from reference conditions." This a good point, is very important, and is a good argument for more lower and mid level areas to be recommended as Wilderness or at least Wildlife Management Areas.

P 93, MA-STD-WLDF-02, regarding roads and trails in WMAs. There should be no net gains in roads in any WMA, even if they're not over the mile per square mile threshold. In fact there should be no increase in road density anywhere in the GMUG.

P 93-94, SMA, in alt D the SMAs shall be removed from suitable for timber production. This should also apply to WMAs.

Appendix 6, p 180, Again I agree that ecosystem representation, namely the inclusion of more protected areas from ponderosas, down, should be a big consideration in Wilderness evaluation. Thanks for including the FS Handbook cite on this. This is mentioned again on p 343. But unfortunately it seems like the areas with underrepresented ecosystems are again rejected for Wilderness recommendation in alt B.

The above mentioned FSH, ch 20, section 23.1, Ecological Sustainability and Diversity of Plant and Animal Communities, #14), is a simple sentence that is a highlight of the entire handbook. It states "that environmental conditions that sustained species ... in the past are likely to sustain them in the future." I believe this means both quality of habitat (old growth, down wood, patch size, etc), and quality (sizable blocks of natural habitat with connectivity), in all habitats and elevations, including under protected mid and lower elevations.

Appendix 4, p 93-94. The plan components and Regional Sensitive Species mentioned for aspen and spruce-fir/ aspen are good. The 93% and 56% threat of loss of AS and SF/S are so dire that it warrants some of these species being considered as Species of Conservation Concern.

Appendix 6, Wilderness. As I mentioned above I think analyzed areas rated high, or those that are close to that, with large areas of underrepresented habitat types should be recommended, regardless of what county they're in. Kelso, and all of the areas considered on the Uncompahgre Plateau, would be good choices. I also think the entire Elk Park/ Flat Tops/ Chalk Mountain complex deserves Wilderness designation. Mendicant Ridge and other areas adjoining the West Elk Wilderness should also be recommended for Wilderness.

To sum it up, I think one main theme of the 2012 plan is the intent to conserve large, connected areas, with few if any motorized routes or other damaging activities, in all ecosystems. This can be done by Wilderness recommendation, Wildlife Management Areas, or other designations, and to a lesser degree with Desired Conditions and Standards. This needs to be done in an unambiguous way that prevents it from being easily undone.

Thanks,

Bill Day