Objection to Regional Forester’s Species of Conservation Concern List for the GMUG National Forest

**1. Objectors' Name and Address:** a) Colorado Native Plant Society (CoNPS), 1536 Wynkoop Street, Suite 911, Denver, Co 80202. conpsoffice@gmail.com b) Gay Austin, [ ]

**2. Signature or other verification:**

**3. Lead Objector:**  Brad Klafehn, Co-Chair, CoNPS Conservation Committee, brad@bradk.org, (303) 868-0497

**4. Plan revision being objected to, and name and title of responsible official:** **Grand Mesa, Uncompahgre and Gunnison National Forests** Species of Conservation Concern Determination associated with **Grand Mesa, Uncompahgre and Gunnison National Forests Revised Land Management Plan and Final Environmental Impact Statement. Reviewing Office: Chief of US Forest Service**

****5. Statement of Issues:****  The Regional Forester Unjustifiably Denies Species Of Conservation Concern Designation To Many Deserving Vascular Plant Species on the GMUG Forest.

a) The Regional Forester failed to list at least one endemic threatened plant found on the GMUG, the Grand Junction Milkvetch (Astralagus linifrolia), contrary to Forest Service Manual 2670.32(1) (“[a]ssist states in achieving their goals for conservation of endemic species”)

b) The Regional Forester misapplied Criterion 2 of Forest Service Handbook 1909.12.52d(1)(f)(2), requiring both parts of Criterion 2 to be met, functionally turning the OR in the regulatory language into an AND.

c) Contrary to Forest Service Manual 2670.44(5) (“ensure that planning for those species common to two or more forests is coordinated among concerned units”), the revised GMUG SCC list is inconsistent with SCC lists for neighboring forests, particularly the Rio Grande National Forest.

d) Contrary to Forest Service Manual 2670.44(2) (“[c]oordinate regional programs with states and other federal agencies...concerned with the management of…sensitive species.”), the GMUG SCC list is also inconsistent with the Bureau of Land Management's “Species of Special Concern” lists for BLM Field Offices which immediately adjoin the GMUG.

**6. The Objection and Recommendations:**

 **A) The Objecrtion:** The Regional Forester Unjustifiably Denies Species Of Conservation Concern Designation To Many Deserving Vascular Plant Species on the GMUG Forest.

We appreciate GMUGs acceptance of 10 plant species we had suggested be added to the list of Species of Conservation Concern (SCC) Thank you.

We are confused, however, by the decision to reject other plant species from designation as SCC. Given that the mandate of the Forest Service is to “maintain viable populations of all native...plant species” (Forest Service Manual 2670.22(2)) and to “[a]ssist states in achieving their goals for conservation of endemic species” (Forest Service Manual 2670.32(1)), it was disappointing to see that rare Colorado endemic plant species, found on the GMUG, have been excluded from the SCC.

In addition, Forest Service guidance is to “ensure that planning for those species common to two or more forests is coordinated among concerned units.” (Forest Service Manual 2670.44(5)). Yet, a number of plant species found on the Rio Grande National Forest SCC have been excluded from the GMUG SCC. The Regional Forester is expected to ensure consistency across forests.

It also the Regional Foresters responsibility to “[c]oordinate regional programs with states and other federal agencies...concerned with the management of…sensitive species.” (Forest Service Manual 2670.44(2)) The Bureau of Land Management, however, has listed several species rejected by GMUG on the agencys “Species of Special Concern” for Field Offices immediately adjoining GMUG, yet these species have been rejected. It is not clear why these inconsistencies have occurred in the GMUG plan.

Finally, the criteria for rejection of SCC seem inconsistent with other statements made by GMUG and with the practices which resulted in the Rio Grande NF SCC. Forest Service Handbook 1909.12.52d(1)(f) gives the four criteria used to determine if there is substantial concern for the continued viability of species on the plan area:

f. Species for which the best available scientific information indicates there is local conservation concern about the species capability to persist over the long-term in the plan area due to:

(1) Significant threats, caused by stressors on and off the plan area, to populations or the ecological conditions they depend upon (habitat). These threats include climate change.

(2) Declining trends in populations **or** habitat in the plan area. [Emphasis added]

(3) Restricted ranges (with corresponding narrow endemics, disjunct populations, or species at the edge of their range).

(4) Low population numbers or restricted ecological conditions (habitat) within the plan area.

The Regional Forester explained his use of these criteria in the document entitled “Enclosures\_Species of Conservation Concern Final List and Process Rationale.pdf”. There, he said: “It is worth noting that three of the four indicators of conservation concern (Indicators 1, 2, and 4) are about populations or ecological conditions/habitat and a species can meet such an indicator with information about either the population or ecological conditions/habitat, it need not have both.” (P. 5) (Emphasis in original.)

The most common reason for rejecting a plant species from the SCC list is that Indicator 2 (“Declining trends in populations **or** habitat in the plan area” (emphasis added) had not been met because there was no population trend information available. In most all cases, however, the Forest had also concluded that the habitats of these plants were “extremely or highly vulnerable to climate change”. Yet the Forest decided that because they had not documented population trends for that species, that the species was ineligible for SCC designation. That finding seems directly contradicted by the Regional Foresters statement above.

In addition, we note that many state-ranked S1 and S2 plant species were excluded from consideration at the outset because their global ratings are lower than G1G2/T1T2. The State has already concluded that continued viability is a concern for these species by ranking them S1 or S2. The FEIS nowhere shows that State rankings.

S1 species are

[c]ritically imperiled because of extreme rarity or because of some factor(s) making it especially vulnerable to extirpation or extinction. Typically 5 or fewer occurrences or less than 1000 remaining individuals”, while S2 species are “[i]mperiled because of rarity or because of some factor(s) making it very vulnerable to extirpation or extinction. Typically 6 to 20 occurrences or between 1,000 and 3,000 remaining individuals.

[Cite source]

With these small numbers of plants, the GMUG should have factored in the possibility of stochastic events which could easily erase those species from the GMUG, as the Rio Grande National Forest did when compiling their SCC.

For example, here is the RGNF rationale for including Colorado larkspur on the Rio Grande SCC:

Rio Grande Revised Forest Plan at 178.

Note here that the population data for Colorado larkspur was some 25 years old and there is no population trend noted. Yet, the Regional Forester accepted this species and others like it and noted that “small and isolated populations are susceptible to genetic drift and stochastic events” making them “more susceptible to loss”. This same rationale for potential stochastic losses of small populations should be applied consistently in the GMUG plan.

In the table below, we take a number of species which were denied designation as SCC and we indicate which of the problems noted above apply to the GMUG analysis of that plant species.

Table 1. Properties of Ten Plant Species Deemed Ineligible for Inclusion on GMUG “Species of Conservation Concern” List

| **Common Name**  | **Scientific Name** | **S Rankings** | **Endemic?** | **On Adjoining SCC?** | **Declining Trend in Habitat?** | **Reason for Denial** |
| --- | --- | --- | --- | --- | --- | --- |
| Grand Junction Milkvetch | Astralagus linifolius | Not ranked | Yes | Yes, Grand Junction FO, BLM | One occurrence, 500 individuals. “Species is extremelyendemic to the area around Grand Junction and a single population in the plan area threatened by physical disturbance. No known trendin population in plan area.” | Conservationconcern does notrise to the level ofsubstantial... Doesnot meetIndicator 2. |
| Leadville milkvetch | Astralagus molybdenus | Not ranked | Yes | On White River NF “Species of Viability Concern” | “Two of the occurrences in the plan area are known to be stable, no other population trend data available for the plan area...Habitat is highly vulnerable tonegative impacts from climate change and off-highway vehicles are a known.” | Ditto |
| Naturita milkvetch | Astralagus naturitensis | S3 | No | SWAP Tier 2; Special Status Species on Grand Valley and Uncompahgre FO BLM List | “Extremely vulnerable to climate change” “Trend in plan area is stable, but small.” | Ditto |
| Peculiar or Paradox moonwort | Botrychium paradoxum | S1 | No | USFS Region 2 Sensitive Species List | 20-25 plants in one occurrence. “Extremely vulnerable to climate change within the plan area.” “Population seems stable.” | Ditto |
| Northern Moonwort | Botrychium pinnatum | S2 | No | Rio Grande NF SCC | Three occurrences with small populations. “Moderately vulnerable to climate change...no known trend in population in plan area.” | Ditto |
| Least moonwort | Botrychium simplex | S2 | No | Rio Grande NF SCC | Three known occurrences, small habitat. “Highly vulnerable to climate change...no known trend in population in plan area. | Ditto |
| Arctic braya | Braya glabella var. glabella | S1S2 | No | USFS Region 2 Sensitive Species List | 5 occurrences. “At-risk due to illegal off-trail OHV use and is extremely vulnerable to climate change. No known trend in population in plan area.” | Ditto |
| Lesser-panicled sedged | Carex diandra | S2 | No | Rio Grande NF SCC, USFS Region 2 Sensitive Species List | “Fens in the plan area are threatened by physical disturbance and those disturbances have resulted in a declining trend...moderately vulnerable to negative impacts from climate change.” “Population in plan area is not endemic, disjunct, or at the edge of the range and does not represent a restricted range.”FS says “does not represent a restricted range” but it is a fen-obligate species, and fens are rare on GMUG. | Ditto. |
| Tundra buttercup | Ranunculus gelidus (aka grayii) | S2 | No | On White River NF “Species of Viability Concern”; USFS Region 2 Sensitive Species List | Four occurrences, 80 individuals. “Rated as extremely vulnerable to climate change, and its alpine habitat is rated as highly vulnerable to climate change. No known trend in population in plan area.” | Ditto |
| Kings campion | Silene kingii | S1 | No | Rio Grande NF SCC | One occurrence. Cites G3 rating but not S1. “Habitat is highly vulnerable to climate change. No known trend in population in plan area.” | Ditto |

In addition, there are another 15 S1 and S2 ranked plant species which were deemed ineligible for inclusion as SCC. Most of these were disqualified because of the lack of data showing population declines. Although the Forest Supervisor has stated that species need not show both population and ecological condition decline, the GMUG has required both.

 **B) Recommendations:**

Add all the species in the table above to the SCC list for the GMUG.

**7) Statement Demonstrating Link Between Formal Comments and Objection:**

 a) Comment by Bayard Ewing for Colorado Native Plant Society on initial GMUG Scoping, June 1, 2018. Issues raised included:

 1) Scoping contains minimal content for and recognition of climate change as a Need for Change (P. 2);

 2) Forest should perform or contract with others to perform more extensive efforts to document rare plant populations including a potential bio-blitz, with which we would assist (Pp. 5-6);

 b) Comment by Bayard Ewing for Colorado Native Plant Society on Draft FEIS, 11/18/2021, incorporating comments by Peggy Lyon and Gay Austin. Issues raised included:

 1) Need for more comprehensive inventory of populations of listed and candidate SCC species (P. 1);

 2) Requests that particular species of rare plants be designated as SCC (Pp. 1-3);

 3) Criticism of the criterion that declining population trend data is a required component for finding substantial concern of continued viability. Declining trends in habitat in plan area, most notably the alpine, should be sufficient to meet Criterion 2 (Pp. 1-2)

 4) Failure to evaluate for consistency SCC lists on adjoining forests or those species designated by the State of Colorado through the State Wildlife Action Plan (SWAP) (P. 2).