



Intermountain Forest Association

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January 23, 2018

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

Dear Mr. Armentrout:

The Intermountain Forest Association and its' members appreciate this opportunity to offer the following comments on the draft Identifying and Assessing At-Risk Species Assessment and draft proposed list of Species of Conservation Concern (SCCs) associated with the Grand Mesa, Uncompahgre, and Gunnison National Forests forest plan revision.

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.

Thank you for this opportunity to review and comment. We would be happy to discuss these comments and recommendations with you at your convenience.

Sincerely,

Molly Pitts

Molly Pitts
Intermountain Forest Association
Colorado Programs Manager