



Southeast Region
4255 Sinton Road
Colorado Springs, CO 80907
P 719.227.5200

September 25, 2025

United States Forest Service (USFS)
M. Beth Davis, Land Management Planner
1127 Sherman Street, Suite 300, Denver, CO 80203
mary.davis@usda.gov

Subject: Cimarron and Comanche National Grasslands (CCNG) Revised Land Management Plan and Species of Conservation Concern Draft List

Dear Ms. Davis,

Colorado Parks and Wildlife (CPW) appreciates the opportunity to participate as a Cooperating Agency on the Cimarron and Comanche National Grasslands (CCNG) Revised Land Management Plan. This letter was drafted to provide comment on the revision working group for the Revised Land Management Plan Draft Assessment and Species of Conservation Concern (SCC) Draft List. This letter includes a brief background, summary of CPW's requested revisions to the SCC Draft List based on the SCC identification criteria outlined in the Revised Land Management Plan Draft Assessment and associated Appendices. Also included in this comment package is a spreadsheet that provides a comparative analysis of the SCC Draft List against the CPW-identified Species of Greatest Conservation Need (SGCN) known to occur in the Comanche National Grassland.

Background

CPW has a statutory responsibility to manage all wildlife species in Colorado. As part of that mission, CPW maintains a State Wildlife Action Plan (SWAP) to assess the status of wildlife and habitats, identifies conservation priorities, and guides action over a 10-year horizon. SGCN are species experiencing population declines, habitat threats, or ecological vulnerabilities requiring proactive conservation. These may include federally or state-listed threatened, endangered, or special-concern species. The updated SWAP was released July 8, 2025 and leverages best available science to determine what species qualify as SGCN based on data collected and analyzed by CPW as well as public and partnership agency contributions. CPW recommendations for SCC Draft List revisions are based on these data. Where additional data sources are leveraged to support substantive comments for each species, those have been identified in the attached SCC/SGCN Comparative Analysis Spreadsheet.

Summary of CPW Requested Revisions: SCC Draft List

Based on CPW review, CPW recommends inclusion of two additional birds; Scaled Quail (*Callipepla squamata*) and Lesser Prairie-Chicken (*Tympanuchus pallidicinctus*); seven



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additional bat species; Canyon Bat (*Parastrellus hesperus*), Eastern Red Bat (*Lasiurus borealis*), Fringed Myotis (*Myotis thysanodes*), Northern Hoary Bat (*Lasiurus cinereus*), Yuma Myotis (*Myotis yumanensis*), Western Small-Footed Myotis (*Myotis ciliolabrum*), Little Brown Myotis (*Myotis lucifugus*); and three additional reptile species; Colorado Checkered Whiptail (*Aspidoscelis neotesselatus*), Desert Nightsnake (*Hypsiglena chlorophaea*), and Lesser Earless Lizard (*Holbrookia maculata*).

These recommendations are based on SWAP 2025 species recommendations and review of best available science datasets. If a species was not identified by the USFS as meeting the four SCC identification criteria but was listed as a SGCN based on CPW 2025 review, a subject matter expert was consulted. That CPW staff member evaluated population status, trend, abundance, and distribution data, where available; historical and contemporary survey data, monitoring records, field observations, agency and partner databases, and published literature. These data were used to evaluate the species against the SCC identification criteria. If the species was determined to meet the identification criteria they were included in the above recommended species inclusions. Additionally, CPW staff met with USFS to discuss their findings and provide supplemental datasets regarding these recommendations.

The SCC/SGCN Comparative Analysis Spreadsheet provided with this letter includes additional species-specific recommendations and rationale in column O to ensure comments are substantive and compliant with SCC identification criteria.

SCC/SGCN Comparative Analysis Spreadsheet

In the attached spreadsheet you will find the following:

- Tab 1, SWAP2025Species_CNG provides a complete summary of 2025 SWAP SGCN including columns for the major group, common name, scientific name, conservation priority status, 2025 SWAP status, comparative analysis column against the SCC Draft List, and data precision type.
- Tab 2, OtherSpeciesOverlapCNG, evaluates species whose conservation status changed in 2025.
- Tab 3, Comparative Analysis, provides a tabular view of the comparative analysis between the SCC Draft List and the 2025 SWAP SGCN. Column J identifies if the species considered is currently included in the SCC Draft List. If the species is present on the SCC Draft List, it is listed as “Yes” in Column J. If the species is classified as SGCN but is not currently included in the SCC Draft List, it is listed as “No - SWAP”. These species were reviewed by CPW staff to determine if there was sufficient evidence to meet the SCC identification criteria. If staff determined the species meets the identification criteria based on 2025 SWAP species analysis findings, then a comment is provided in Column O.

Closing Remarks

CPW appreciates your consideration of the comments and recommendations provided regarding the Cimarron and Comanche National Grasslands (CCNG) Revised Land Management Plan Draft Assessment and Species of Conservation Concern (SCC) Draft List. CPW looks forward to



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continued collaboration with the USFS and other Cooperating Agencies and stakeholders regarding the Management Plan revision.

Sincerely,



Todd Marriott
Area Wildlife Manager - Area 12
P 719.336.6603 | C 719.688.9241
2500 South Main
Lamar, CO 81052
todd.marriott@state.co.us

Cc: Carolyn Craveiro de Sá, SE Land Use Specialist- carolyn.craveirodesa@state.co.us



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