



United States
Department of
Agriculture

Forest
Service

Coronado National Forest
Supervisor's Office

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File Code: 1570; 2670
Date: June 27, 2018

Mr. Robin Silver, M.D.
Co-Founder and Board Member
Center for Biological Diversity
P.O. Box 1178
Flagstaff, AZ 86002-1178

Dear Dr. Silver:

This letter is in response to the Center for Biological Diversity's Notice of Intent (NOI) to sue the U.S. Department of Agriculture, the U.S. Forest Service (USDA Forest Service), the U.S. Department of Interior, and the U.S. Fish and Wildlife Service received on April 13, 2018 for failing to reinitiate Endangered Species Act (ESA) Section 7 consultation on the endangered Mount Graham red squirrel. Your NOI raises a number of concerns, including the change in the species status; the special use permits issued for the Recreational Summer Cabins and Columbine recreational summer camp (i.e., Arizona Bible School Organization Camp); and agency obligations under ESA section 7(a)(1).

Both the Forest Service and the Fish and Wildlife Service agree that re-initiation of consultation under Section 7 is needed at this time. Surveys following the 2017 Frye Fire indicate a decline in the population of the Mount Graham red squirrel and impacts to its designated critical habitat. As provided in 50 CFR §402.16, re-initiation of ESA section 7(a)(2) formal consultation is required if one or more of the four ESA re-initiation criteria have been triggered. The USDA Forest Service, in conjunction with the U.S. Fish and Wildlife Service, has identified the population decline of the Mount Graham red squirrel and changes to its designated critical habitat as new information. Therefore, the Coronado National Forest is in the initial phases of the preparation of the required Biological Assessments, and will be working with the Tucson Field Office of the U.S. Fish and Wildlife Service to complete the re-initiation of consultation for ongoing activities in the Pinaleno Mountains, Safford Ranger District, Graham County, Arizona.

The Coronado National Forest is also in the process of renewing the Special Use Permit for the Columbine recreational summer camp (i.e., Arizona Bible School Organization Camp). Prior to re-authorizing this permit, the USDA Forest Service will consult with the U.S. Fish and Wildlife Service.

The USDA Forest Service has been working cooperatively with U.S. Fish and Wildlife Service, University of Arizona, Arizona Game and Fish Department, and Arizona Center for Nature Conservation-Phoenix Zoo on a number of programs for the conservation of the Mount Graham red squirrel post-Frye Fire. Much of the Mount Graham red squirrel's food supply was impacted by the Frye Fire so, in October of 2017, a supplemental feeding program was implemented to support the survival of the remaining red squirrels through the winter. Other projects under development or in process include: deploying anti-aggregation pheromones to reduce likelihood



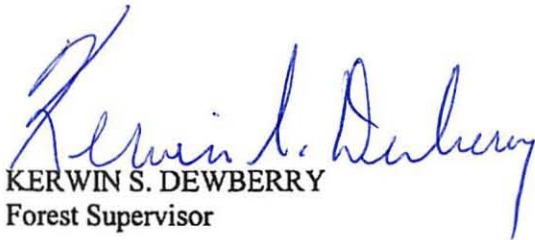
of beetle kills of trees; conducting on the ground searches for new middens and GIS analyses and ground-truthing of remaining habitat; collecting LiDAR data to determine remaining red squirrel habitat, areas suitable for habitat enhancement, and possible translocation sites within the species' range; reducing food and habitat competitors; continuing ex-situ breeding strategies at the Arizona Center for Nature Conservation-Phoenix Zoo; completing the annual fall census; determining possible translocation strategies and methods; and developing long-term forest management strategies across the fire-impacted landscape such as continued fuel treatments, and reseeding and/or planting coniferous trees.

Sincerely,



SHAWN SARTORIUS

Acting Field Supervisor for Arizona, U.S. Fish and Wildlife Service



KERWIN S. DEWBERRY
Forest Supervisor

cc: Sonny Perdue, U.S. Department of Agriculture
Vicki Christiansen and Cal Joyner, U.S. Forest Service
Ryan Zinke, U.S. Department of Interior
Melanie Ruiz, Amy Leuders, Julie McIntyre,
Scott Richardson, and Marit Alanen, U.S. Fish and Wildlife Service