From:	Reeves, Julie
To:	FS-PSICC CCNG Revision
Cc:	O"Meilia, Chris
Subject:	USFWS Colorado Field Office comments on CCNG Plan Assessment
Date:	Monday, September 22, 2025 3:20:19 PM
Attachments:	image.png Outlook-gu2kdlht

Dear Cimarron and Comanche National Grasslands Planning Team,

The comments from the U.S. Fish and Wildlife Service's Colorado Ecological Services Field Office are below. I understand that Kansas will also be submitting comments on the Plan. Please reach out to me if you have any questions, and I look forward to continued coordination with you on the Plan.

On December 5, 2024 (2024-0016031), the U.S. Fish and Wildlife Service (Service) Colorado and Kansas Field Offices provided the U.S. Forest Service Cimarron and Comanche National Grasslands (Grasslands) recommendations specific to T&E species, our National Listing Workplan, our National Downlisting and Delisting Workplan, Birds of Conservation Concern, migratory birds, and bald and golden eagles. The following comments are provided in accordance with section 7 of the Endangered Species Act (ESA) of 1973, as amended (16 USC 1531 *et seq*.) and the Interagency Cooperative Regulations (50 CFR 402). We are also providing recommendations concerning migratory birds in accordance with the Migratory Bird Treaty Act (MBTA), 16 U.S.C. 703, and the Bald and Golden Eagle Protection Act (Eagle Act), 16 U.S.C. 668. Wetlands are afforded protection under Executive Orders 11990 (wetland protection) and 11988 (floodplain management), as well as section 404 of the Clean Water Act. Other fish and wildlife resources are considered under the Fish and Wildlife Coordination Act, as amended, 16 U.S.C. 661 *et seq.*, and the Fish and Wildlife Act of 1956, as amended, 16 U.S.C. 742a-742j.

The Grasslands requested that the Service provide feedback on the June 2025 Draft Assessment, a document intended to provide a description of the current condition or environmental baseline for the Grasslands, and which will be built upon to develop the Plan.

<u>Specific comments on the assessment:</u>

Key theme that should be carried through the Plan: Appendix A, page 31 includes the statement, “most of the land that now makes up the Grasslands was cropland abandoned in the 1930s…” This context should inform all management of the Grasslands, using available data to show historical use, restoration, and management of these lands. We recommend that this key theme be woven throughout the Assessment and Plan to help describe the disturbed nature of the Grasslands’ historical use. Any management attempts to direct ecological processes should be assumed with the underlying principle that these were historical croplands that have returned to grassland in the last 100 years.

Infrastructure on page 19 of the Assessment describes current condition of infrastructure consisting of a “network of rural roads, trails, water and wastewater systems, communications towers, bridges, dams, and recreational facilities that support both Forest Service operations

and public use." We recommend that fences be included in this list, as they are called out in the paragraph below with regard to fragmentation of habitat. We also recommend that removal or management of existing infrastructure (e.g., fence removal or marking) be included in the Plan Revision as an action that may occur in conjunction with habitat improvement for some species.

Further, by including all of the non-Forest Service lands within the plan area (or the administrative boundary – these appeared to be used interchangeably within the Assessment), the scope of the Infrastructure driver and stressor should include all of the existing non-Forest Service infrastructure. These county roads, homes, farms, and businesses all occupy the same plan area and influence the current condition of the patchwork that is the National Grassland. While the Plan revision will not have management implications for those non-Forest Service lands, the Plan should recognize that the presence of Infrastructure on those lands will influence how the Forest Service manages its own lands (e.g., will not designate a wilderness area adjacent to a residential area).

Prairie dogs: The treatment of prairie dogs in the Herbivory section (e.g., pages 18, 23) suggests that prairie dogs play an important role as keystone species, but counters that with negative effects to the landscape and to livestock. We recommend that the Plan take a more balanced approach to the role prairie dogs play in the environment, including beneficial effects to native and livestock grazers (see: https://www.sciencedirect.com/science/article/abs/pii/S1550742418300459?via%3Dihub).

Threatened, endangered, proposed, and candidate species

Lesser prairie chicken: the status of the lesser prairie-chicken is in flux, and at the time of this review, has been removed from the protections of the ESA by a court ruling of August 12, 2025 (https://oklahoma.gov/content/dam/ok/en/oag/news-documents/2025/august/Lesser%20Prairie%20Chicken%20Order.pdf). The Service intends to write a direct final rule removing the lesser prairie-chicken from the ESA list. We will commence an updated species status assessment and anticipate a new 12-month finding after that. We recommend that the Grasslands continue to provide management and conservation efforts in support of this species, regardless of its status.

The Comanche Lesser Prairie-Chicken Habitat Zoological Area section should include a map showing historical and current boundaries, and how the various management activities have influenced the presence or absence of lesser prairie-chickens in this area over time (including translocation efforts and their results). A table indicating status and trends, also showing the introduction of birds from Kansas, would help tell the story of this portion of the Grasslands.

Eastern black rail: This species is not likely to occur within the Grasslands for breeding or nesting, though we may expect individuals to stop at riparian areas, wetlands, and prairie rivers and streams during migration. The presence of playas, if they are sufficiently vegetated, may also represent stopover habitat, and so we recommend inclusion of playas as possible habitat for this species within the Plan area. This may mean that the Grasslands are more important to eastern black rails during migration in spring and summer than as a breeding or nesting area. Further, to understand the current condition of eastern black rail within or near

the Grasslands, the Assessment should provide a more detailed assessment of the location of recent sitings along the Arkansas River with respect to the location of the Grassland.

Suckley's cuckoo bumble bee: This species is presumed extirpated in Colorado, and no historical records exist for the species in southeastern Colorado or in Kansas. As such, specific measures targeting Suckley's cuckoo bumble bee in Colorado and Kansas are not likely to benefit this species. However, we recommend that the Grasslands focus their work on implementing best management practices to support a variety of pollinators, such as providing areas with suitable thermal refugia, ensuring locations for diapause, establish areas of rick floral resource abundance and diversity, and increase habitat connectivity.

(see Figure 4 of the Suckley's cuckoo bumble bee SSA: https://iris.fws.gov/APPS/ServCat/DownloadFile/263505).

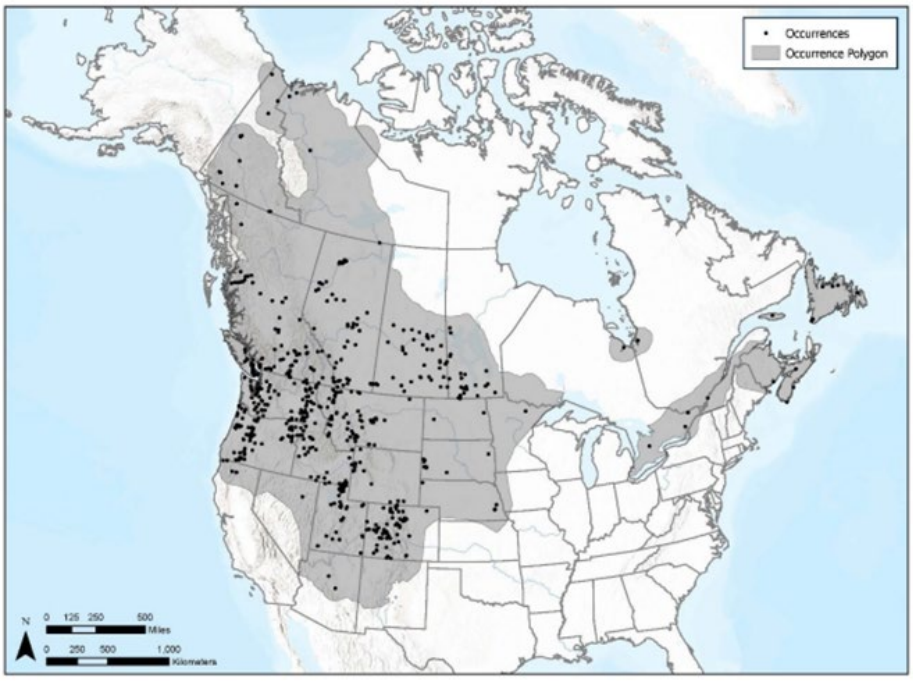

***Figure 4**. Occurrence polygon of Suckley's cuckoo bumble bee in grey overlaid with all known occurrence points from 1893-2022 in black. The occurrence polygon was delineated with a combination of level II ecoregions (CEC 1997) and a 100-kilometer (62-mile) buffer around observations of the species. The occurrence polygon is generally inclusive of areas between positive occurrence locations – areas with sparse survey data were included. The methodology used to delineate the occurrence polygon and analytical units is described in 6 Assessment Methodology.*

Black-footed ferret: The status of prairie dogs on the Cimarron and Comanche National Grasslands is directly related to the presence of black-footed ferrets on the Grasslands. We recommend that the Plan include the possibility of future black-footed ferret releases onto the Grasslands should prairie dog populations grow sufficiently to sustain ferrets. The Service can work with the Grasslands to develop a reintroduction plan for future introductions to provide regulatory certainty to the Grasslands.

Tricolored bat: It is possible that tricolored bats use the Grasslands both during the summer and the winter. While the tricolored bat requires trees for roosting in summer, where it uses the leaves and needles along branches to shelter during the day, the Assessment describes

possible winter hibernacula habitat as well under Caves and Karst Resources. Additionally, tricolored bats are known to roost in residential and farm buildings. Further, we have recently discovered a group of tricolored bats using a CDOT bridge for day roosting in late summer outside of Denver. This indicates any bridges located within the Grasslands may provide roosting habitat for this species. Table 23 of the Assessment identifies four bridges located within the Plan area, though there are likely many other bridges not included in the Assessment because they were excluded from the Infrastructure definition.

Regal fritillary (*Argynnis idalia occidentalis*) and monarch butterfly (*Danaus plexippus*): The Service supports the efforts of the Grasslands to conduct surveys for these important pollinators, as well as management activities that will improve and possibly attract these species. The Assessment states that low numbers of monarch observations have occurred "(e.g., <10)" without providing context for the number. The Plan should state what the actual number of records per year or unit of effort were detected for each species to provide an understanding of the current condition of these species within the area.

Rangeland Management: The status and trends section lacks sufficient detail to understand this very complex and important use of the Grasslands. We would expect this section to provide an overview of the existing allotments that are authorized for livestock grazing, how many acres each is, how many AUMs are permitted on each (even only for this year, since the Assessment is supposed to be a snapshot showing the current condition), and whether or not they are meeting performance standards. This section would be improved by including the Grazing Statistical Summary Reports developed by the USFS for the Grasslands. We would also expect to see other aspects of grazing management, such as fencing, watering, trailing, gather areas, and loading and unloading management. While the Assessment explains how the numbers of animals changes based on vegetative management objectives, annual precipitation, and local economic factors, the Plan should explain what the various thresholds have been or will be. The presence of stock tanks for livestock grazing provide a water source where no natural options occur, and we recommend that these are fitted with wildlife egress ramps so that bats, birds, and other wildlife are not drowned while seeking water.

Energy, Minerals, and Geological Resources: Based on the current pressure for new wind and solar development in the area within and around the Grasslands, there is also a driver for new transmission. Further, large scale transmission lines may have already been proposed within the boundaries of the Grasslands as well, indicating additional pressures on the landscape. This section should include the existing energy production activities within the boundaries (even something as basic as the Special Uses Authorizations included in Table 19) as well as what the Grasslands may be requested to permit in the future.

Communication systems: The Assessment describes the presence of 10 radio towers within the plan area. We recommend that the Plan describe how these meet or exceed the Service's bird-friendly communication tower toolkit (https://www.fws.gov/library/collections/bird-friendly-communication-tower-toolkit**).**

Thank you for the opportunity to review and comment on the Assessment.
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A thing is right when it tends toward the integrity, stability, and beauty of the biotic community; it is wrong when it tends otherwise. ~Aldo Leopold