September 14, 2016

Dear Forest Plan Revision Team,

Please consider the following both a species of conservation concern comment, and a request for information.

I believe it will be particularly difficult for citizens, or even botanists and wildlife biologists, to comment on the Draft Species of Conservation Concern (SCC) without knowing the bases on which the 53 potential plant species of conservation concern noted by the Regional Office were reduced to two potential SCC by the Manti-La Sal NF; or the bases for rejection of certain wildlife species, e.g., the one pollinator, Western Bumblebee; and the Southern Bonneville Springsnail.

I **request a copy of each species’ review template** (a total of 77 ) as completed by the Manti-La Sal National Forest. Each will include, as I understand it, the I.D. Team specialist’s recommendations (see p. 3 of the attached document, “Manti-La Sal National Forest Potential Species of Conservation Concern (SCC) Review Procedural Report”). I also request a copy of all documents highlighted in yellow on pp. 4 and 6-8 in the same “Procedural Report.” Those that are highlighted are documents that I do not believe are easily accessed other than by this request (e.g., personal communications). Please let me know if any of them are, in fact, easily obtainable, e.g., on the web. I figure that all these documents can be rapidly located in the forest plan revision Project File; I and others will need time to review them in order to submit timely further comments.

There are a couple of reasons for this request.

#1 At the Moab Open House yesterday (9/13), I asked a question about the bases on which the 53 potential plant SCCs were reduced to 2. I was told that for at least some of them, the Forest simply lacked knowledge of the population status or trend of the species on the forest to establish “substantial concern”

Substantial Concern: *“The best available scientific information about the species indicates substantial concern about the species’ capability to persist over the long-term in the plan area.*” (FSH 1909.12(10)(12.52c)).

On the other hand, Barb Smith (Wildlife Biologist) gave an example of a plant, Geyer’s Onion, which the Manti-La Sal dropped from the Regional Office list because she believes there is a viable population of the species; she has seen it growing in a number of places where cattle do not graze, beneath pinyon-juniper.

Viable Population: “*A population of species that continues to persist over the long term with sufficient distribution to be resilient and adaptable to stressors and likely future environments*.” (§219.19)

**Thus, I am interested in obtaining the requested documents in order to understand which plant and wildlife species the Manti-La Sal NF does not recommend as a species of conservation concern because the Forest has documented that a viable population of the species is present on the forest versus which species the Manti-La Sal NF does not recommend because the Forest simply lacks knowledge about the population status or trend.**

It is the latter situation that is of great concern. The Regional Office has sent a list of 53 plant species for which there is evidence of concern regarding long-term persistence, at least at the state level. If some or many of those species are then dropped from the list simply because the Forest has little or no knowledge of the species’ viability on the forest**, it would seem that further investigation and assessment are in order**. For instance, is the preferred habitat of the species one which is frequented by livestock (e.g., meadows, riparian areas, sagebrush community, grasslands, ponderosa pine community)? Has any scientific research indicated a relationship between anthropogenic disturbance and population decline of the species? Is the species susceptible to drought or excessive heat?

As an aside, I’m sure the Forest is aware of the irony that the only two plant species of proposed by the Forest as species of conservation concern are two alpine plants found above 11,000’, where exotic goats are grazing within the Mount Peale Research Natural Area, in contravention of national forest regulations that direct the forest to remove exotic species from research natural areas.

#2. The information in the documents may be useful in preparation of a conservation alternative for the forest plan revision EIS.

For reference, I attach the Regional Office lists of potential plant and non-plant SCC, with those accepted by the Manti-La Sal NF as potential SCC highlighted in yellow.

Please let me know if you have questions.

Thank you,

Mary O’Brien