Attachment 1 to IFA comment letter on draft RGNF revised forest plan, in reference to Species of Conservation Concern

Species	Occurrence?	Substantial Concern?	Plan Components?	Recommendation
Western Bumblebee	No. According to overview, no occurrences documented in NRIS database for RGNF.	NA.	No discussion of coarse filter or fine filter plan components.	Does not qualify for SCC.
White-veined arctic butterfly	No. One sighting, 21 years ago, does not support a conclusion that the species "is established" in the plan area (1909.12, 12.52c-1).	NA.	No.	Does not qualify for SCC.
Boreal toad	Yes.	Yes.	No discussion about whether ecological plan components are adequate or species-specific plan components are necessary.	Either state that ecological plan components are adequate or propose species-specific plan components.
Rio Grande Chub	Yes.	Yes.	No discussion about whether ecological plan components are adequate or species-specific plan components are necessary.	Either state that ecological plan components are adequate or propose species-specific plan components.
Rio Grande Cutthroat Trout	Yes.	Yes.	No discussion about whether ecological plan components are adequate or species-specific plan components are necessary.	Either state that ecological plan components are adequate or propose species-specific plan components.
Rio Grande Sucker	Yes.	Yes.	No discussion about whether ecological plan components are adequate or species-specific plan components are necessary.	Either state that ecological plan components are adequate or propose species-specific plan components.
Boreal Owl	Yes.	No. According to overview, major threat may be indirect effect of timber harvesting. However, annual RGNF FY 16 timber harvest acreage was only .1% of RGNF acreage. Also according to overview, nest trees are primarily restricted to aspen; However, according to Cut and Sold report, there was virtually no aspen harvest on RGNF in FY 17. Further, suited timberlands are only 16% of RGNF. Combined, these fall short of the 'substantial concern' threshold.	No.	Does not qualify for SCC.
Brewer's Sparrow	Yes.	No. According to overview, no population trend or abundance estimates are available specific to the planning area.	Yes, see G-SCC-4 and DC-SCC-1. Both are very vague, and neither can be measured or monitored.	Does not qualify for SCC.
Flammulated Owl	Yes.	No. According to overview, population trends for this species in the planning area have not been reported. This falls short of the 'substantial concern' threshold.	Yes - see G-SCC-3. However, G-SCC-3 restricts project related impacts, even though projects do not appear to be an issue for flammulated owls on the RGNF. According to overview, flammulated owls are found in open PP/DF stands, but, according to Cut and Sold there was no PP harvest in FY 16 and very little DF harvest. See our detailed comments about G-SCC-3.	Does not qualify for SCC.

Northern Goshawk	Yes.	No. According to the overview, nest territories in the planning area are closely tied to older aspen stands with structural characteristics to support nest platforms. Current trend of the population within the planning area is not identified and complete post-fledging areas have not been investigated or delineated. As discussed previously, there was virtually no aspen harvest on RGNF in FY 16. That falls short of 'substantial concern' threshold.	Yes, see DC-WLDF-8 and G-WLDF-1.	Does not qualify for SCC.
Olive-sided flycatcher	Yes.	No. The species appears to be fairly common, but not widespread within the planning area with potential decreasing trend locally along two long-term BBS routes within the RGNF. That falls short of "substantial concern" threshold.	No.	Does not qualify for SCC.
Peregrine Falcon	Yes.	No. According to the overview, population trends for this species within the planning area have not been reported but active eyries appear to have decreased during the past decade. However, based on species trends within the state as a whole, a stable or slightly increasing trend is likely. That falls short of the 'substantial concern' threshold.	No.	Does not qualify for SCC.
Southern White-tailed ptarmigan	Yes.	No. According to the overview, an estimated 260,794 acres of occupied range occurs within the planning area, represented approximately 16% of occupied range within USFS Region 2. While the distribution of white-tailed ptarmigan appears to be unchanged from historic levels, population sizes and trends are mostly unknown other than in localized areas of study. This falls short of the "substantial concern" threshold.	No.	Does not qualify for SCC.
American marten	Yes.	No. According to the overview, trend information for this species within the planning area is not available. That falls short of the 'substantial concern' threshold.	No.	Does not qualify for SCC.
Fringed myotis	No. There have only been 2 sightings in the last 20 years.	No. According to the overview, Myotis thysanodes appear to be relatively rare rangewide, but trends in abundance are largely unknown (Keinath 2004). Abundance, distribution, and trend information for this species within the planning area is not available. This falls short of the 'substantial concern' threshold.	Yes, MA-WLDF-1.	Does not qualify for SCC.

Gunnison's prairie dog	Yes.	According to the overview no reliable trend information is available for this species within the San Luis Valley population area. Fitzgerald (1991) expressed concern about the status of the Gunnison's prairie dog in the San Luis Valley, indicating that plague and poisoning had eliminated some populations and overall populations were in poor condition in the area. No trends have been identified for portions of this population within the planning area. This falls short of the 'substantial concern' threshold.	Yes, G-SCC-5.	Does not qualify for SCC.
Northern pocket gopher	No.	NA.	No.	Does not qualify for SCC.
Plains pocket mouse	Yes.	According to the overview no information pertaining to population abundance and habitat trend is reported. Assumption is that habitat trend may be stable, with most private lands likely already in agricultural use, and public lands (BLM, NPS) likely providing stable habitat (USDA Forest Service 2001). Further, according to the overview, no major threats to this species are reported (NatureServe 2015, Linzay et al. 2008). This falls short of 'substantial concern' threshold.	No.	Does not qualify for SCC.
River otter	No. According to the overview, river otters are currently not known to occur within the planning area.	NA.	No.	Does not qualify for SCC.
Townsend's big-eared bat	Yes.	No. According to the overview, overall abundance, distribution, and trend information for this species within the planning area is not available. This falls short of the 'substantial concern' threshold.	No.	Does not qualify for SCC.
Black Canyon gillia	Yes.	No. According to the overview, there are no data on population trends, but occurrence records of revisited populations indicate that some populations have remained the same, some have increased, and some no longer exist (Beatty et al. 2004). This falls short of the 'substantial concern' threshold.	No.	Does not qualify for SCC.

Stonecrop gillia	Yes.	No. According to the overview, there are insufficient data to make any inferences regarding the population trend for Aliciella sedifolia. The population size of the Half Peak occurrence was estimated for the first time in 2003, and later observed again by Hogan and Tembrock in 2007. However, there have been no monitoring efforts from which a trend could be determined. It is very likely that other occurrences remain to be discovered, so more species inventory work is needed before the population trend can be accurately assessed. Further, no exists on abundance changes for the RGNF populations. Overall, based on current information, threats to A.sedifolia are considered relatively low. This falls short of the 'substantial concern' threshold.	No.	Does not qualify for SCC.
Bandegee milkvetch	Yes.	No. According to the overview, there are no data on population trends for Astragalus brandegeei. Population sizes have not been estimated and multi-year population or demographic monitoring has not been initiated for any site. This falls short of the "substantial concern" threshold.	No.	Does not qualify for SCC.
Ripley's milkvetch	Yes.	According to the overview, with the information currently available, it is difficult to predict the effects of threats such as multiple herbivore pressure, prolonged drought, successive fires, or amount of soil disturbance that A. ripleyi can tolerate. THis falls short of the "substantia concern" threshold.	No.	Does not qualify for SCC.
Northern moonwort	Yes.	No. According to the overview, viability of the known occurrences on the planning area has not been assessed; the only potential risk identified in the element occurrence reports is potential road maintenance. Botrychium species remain underground for a large part of their life cycle, which appears to support continued population survival through periods of unfavorable conditions as long as the underground environment is not altered. Thus, even though this species is considered rare in Colorado, its identifiable above ground presence indicates a stable population situation if the disturbance regime is stable (Burkhardt 2002). Further, overall, based on current information, threats to Botrychium pinnatum are considered relatively low. This falls short of the "substantial concern" criteria.	No.	Does not qualify for SCC.

Least moonwort	Yes.	According to the overview, viability of the known occurrences on the planning area has not been assessed; no potential risks were identified in the element occurrence report. Botrychium species remain underground for a large part of their life cycle, which appears to support continued population survival through periods of unfavorable conditions as long as the underground environment is not altered. Thus, even though this species is considered rare in Colorado, its identifiable aboveground presence indicates a stable population situation if the disturbance regime is stable (Burkhardt 2002). This falls short of the "substantial concern" criteria.	No.	Does not qualify as SCC.
Downy Indian-paintbrush	Yes.	No. According to the overview, Durkin (2002) noted that the roadside and foothills habitat is presumed stable, that no known threats to the existing habitat have been documented, and there are no known threats to this species. This falls short of the "substantial concern" criteria.	No.	Does not qualify as SCC.
Dwarf alpine hawksbeard	Yes.	Discussion in the overview includes a) climate change, b) genetic drift, where inbreeding and inbreeding depression, and c) susceptibility to complete loss from a single stochastic event such as a rockslide or avalance. Those are too speculative to establish 'substantial concern' about the species ability to persist over the long term in the plan area.	No.	Does not qualify as SCC.
Weber's catseye	Yes.	No. According to the overview, NatureServe (2015) estimates that there are no major threats to this species, at this time. This falls short of the 'substantial concern' threshold.	No.	Does not qualify as an SCC.
Slender rock-brake	Yes.	No. According to the overview, overall, based on current information, threats to Cryptogramma stelleri are considered relatively low. This falls short of the "substantial concern" threshold.	No.	Does not qualify as an SCC.
Mountain bladder fern	Yes.	No. According to the overview, presently, most threats appear to be at a relatively low and manageable level. This falls short of the "substantial concern" threshold.	No.	Does not qualify as an SCC.
Colorado larkspur	Yes.	No. According to the overview, there is little information on the trend of this species on the Rio Grande NF or from any of the other occurrences. This falls short of the "substantial concern" threshold.	No.	Does not qualify as an SCC.

San Juan draba	Yes.	No. According to the overview, generally, it may be assumed that threats to D. graminea probably mirror threats to alpine tundra plant communities in general. Of those, climate change may be the most severe, yet the current state of knowledge makes the precise nature of this threat to this species largely uncertain and speculative. This falls short of the "substantial concern" threshold.	No.	Does not qualify for SCC.
Gray's draba	Yes.	No. According to the overview, overall, based on current information, threats to D. grayana are considered relatively low. This falls short of the "substantial concern" threshold.	No.	Does not qualify as an SCC.
Smith's draba	Yes.	No. According to the overview, overall, based on current information, threats to D. smithii are considered relatively low. This fall short of the 'substantial concern' threshold.	No.	Does not qualify as an SCC.
Colorado Divide Whitlow-grass	Yes.	No. According to the overview, presently, most threats appear to be at a relatively low and manageable level. This falls short of the "substantial concern" threshold.	No.	Does not qualify as an SCC.
Philadelphia fleabane	Yes.	No. According to the overview, Existing management practices are not known to be causing detrimental impact. This falls short of the 'substantial concern' threshold.	No.	Does not qualify as an SCC.
Many-flower gillia	Yes.	No. According to the overview, existing management practices are not known to be causing detrimental impact. This falls short of the 'substantial concern' threshold.	No.	Does not qualify as an SCC.
Stony-spored quillwort	Yes.	No. According to the overview, there is no information regarding population parameters or demographic features, such as metapopulation dynamics, life span, recruitment, and survival. Because demographic parameters are not currently available, there are no definitive data regarding the vital rates that contribute to species fitness. This falls short of the 'substantial concern' threshold.	No.	Does not qualify as an SCC.
Colorado woodrush	Yes.	No. According to the overview, overall, based on current information, threats to Luzula subcapitata are considered relatively low. This falls far short of the 'substantial concern' criteria.	No.	Does not qualify as an SCC.
Colorado tansy aster	Yes.	No. According to the overview, overall, based on current information, threats to M. coloradoensis are considered relatively low. This falls short of the 'substantial concern' criteria.	No.	Does not qualify as an SCC.

House's sandwort	Yes.	No. According to the overview, overall, based on current information, threats to Minuartia macrantha are considered relatively low. This falls short of the "substantial concern" threshold.	No.	Does not qualify as an SCC.
Parry's crazy-weed	Yes.	No. According to the overview, overall, based on current information, threats to Oxytropis parryi are considered relatively low. This falls short of the "substantial concern" threshold.	No.	Does not qualify as an SCC.
Southern Rocky Mountain cinquefoil	Yes.	No. According to the overview, presently, most threats appear to be at a relatively low and manageable level. This falls short of the 'substantial concern' threshold.	No.	Does not qualify as an SCC.
Arizona willow	Yes.	No. According to the overview, Neely et al. (2009) and Rondeau et al. (2011) evaluated the overall conservation status of S. arizonica and rated it as “moderately conserved.” The viability of Salix arizonica is difficult to ascertain. Very little quantitative data are available. The rate at which this species disperses and colonizes new locations is not well known. Additional information on population sizes and trends is needed to determine the conservation importance of occurrences on US Forest Service (USFS) lands in New Mexico and Colorado. This falls short of the "substantial concern" threshold.	No.	Does not qualify as an SCC.
Tundra saxifrage	Yes.	No. According to the overview, overall, based on current information, threats to Saxifraga caespitosa subsp. monticola are considered relatively low. This falls short of the "substantial concern" threshold.	No.	Does not qualify as an SCC.
King's campion	Yes.	No. According to the overview, there is no information on trend for this species on the RGNF or anywhere else. This falls short of the "substantial concern" threshold.	No.	Does not qualify as an SCC.
Fine bog-moss	Yes.	No. According to the overview, at the present time, most threats appear to be low or are being mitigated. This falls short of the "substantial concern" criteria.	No.	Does not qualify as an SCC.
Rothrock townsend-daisy	Yes.	No. According to the overview, overall, based on current information, threats to T. rothrockii are considered relatively low. This falls short of the "substantial concern' threshold.	No.	Does not qualify as an SCC.