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Pacific Southwest Region  
USDA Forest Service  
Vallejo, CA

SUBMITTED ELECTRONICALLY TO: <http://tinyurl.com/earlyadoptersfpr>

Re: Comments on draft list of Species of Conservation Concern

Dear Mike:

Thank you for the opportunity to comment on the draft lists of species of conservation concern (SCC) for the Inyo, Sequoia, and Sierra National Forests.

Several species are missing from this list due to what we believe is inadequate field surveys. Some of these omissions may be due to the Forest Service not having sufficient staff with training to document local ornithologist sightings.

One omission is glaring, Mountain Beaver, as our Programs Director remembers Forest Service biologist, Teresa Benson, excitedly reporting seeing a Mountain Beaver on Western Divide Highway after a field excursion in either 2003-2004.

Please acknowledge our concerns that species are not being fully considered when so many anthropogenic factors are being compounded by climate change. The list of potential species of concern is reduced by 42% with little explanation and some very flawed data. Far too many rare species are not even considered when evidence is clear that they do in fact occur on the forest.

In a letter dated 29 September 2014, we discussed or listed 97 vertebrate species of conservation concern. The Species of Concern list has only 19 of these species listed. When 80% of species are discounted without mention, it becomes patently clear that no local extirpations are of concern, because the agency believes the species will persist in other areas. In times of climate change, all species currently listed as sensitive should be automatically given conservation status.

One omission is glaring, **Sierra Nevada mountain beaver**, as our Programs Director remembers Forest Service biologist, Teresa Benson, excitedly reporting seeing a Mountain Beaver on Western Divide Highway after a field excursion in either 2003-2004.

**The Mount Pinos Sooty Grouse** is the endemic subspecies found only on the Sequoia National Forest and where there is only one known breeding group left in Kern County. The extirpation from the Los Padres, Sequoia National Forest – Piute and Breckenridge Mountain Ranges does not bode well for the continued existence of the subspecies. The range contraction, without protection, will continue all the way up to the Kings River where the range of this subspecies ends.

**Northern goshawk** – this species is experiencing a drop in population. Ornithologists survey for this species and find fewer each year.

**Swainson's hawk** – this species has been recorded in the South Fork Wildlife Area. With the drawdown of the reservoir, several species of raptors have been successfully breeding on Forest Service land.

**Western snowy Plover** – this species is seen regularly on the mud flats of Isabella Reservoir on Forest Service land. The species breeds at China Lake Naval Weapons Center. We find no evidence of breeding shorebird surveys conducted by experienced surveyors, therefore we conclude that no science has been applied to the determination that this species does not warrant protection.

**Olive-sided flycatcher** – recent summer mountain surveys are yielding fewer and fewer interactions with this species. It prefers to perch on tall coniferous snags.

**Black swift** – this species has nested along South Creek falls in Tulare County. It is seen frequently flying up the Kern River during breeding season. The lack of surveys does not mean it is absent, only that surveys have not been implemented. Salmon Creek falls, where the Black swift has been observed, is a perfect breeding location for this species.

**Lewis' woodpecker** – this species nests in blue oak woodland. Its numbers are never great and with climate change all blue oak woodland is predicted to be extremely susceptible to extirpation. This species will also use burned forest for foraging and nesting.

**Black-backed woodpecker** – the absence of this species is absolutely suspect. There are many scientific studies that outline why this species is in need of immediate protection.

**Sierra marten** – as a species found at higher elevations than the Pacific Fisher this animal is at risk from similar threats including the illegal and legal use of rodenticides.

**Gray-headed pika** – every effort should be afforded to protect this species, which is dying rapidly due to climate change.

**Western Pond turtle** – this species is found on both the north and south fork of the Kern River and needs refugia from flooding of Forest Service lands by the irregular filling of Isabella Reservoir.

The following species were discounted as not occurring on Sequoia National Forest. Biologists have documented each of these although one sighting is second hand from a statement made by a Forest Service biologist.

**Sierra Nevada mountain beaver** – reported to the wildlife crew, in ~2003-2004, as having been seen on Western Divide Highway by an excited Teresa Benson – specimens have been collected in Sequoia National Park in Tulare County.

**Spotted bat** – absence of detection because of no surveys does not mean absence of the species.

**Tulare grasshopper mouse** – found in 2010 in the Scodie Mountains by the Grinnell Resurvey team.

**Porcupine** – why is it not included? It was extirpated by the forest service in the 1960's and should be reintroduced, it is tenuously holding on in the central Sierra.

**Gray Vireo** – discovered on Sequoia National Forest at North Fork Marina in August 2014 by biologist John Schmitt.

**Burrowing Owl** – breeds in Weldon from South Fork Wildlife Area and into BLM managed land.

**California horned lark** – the subspecies breeding along the shore of Isabella Reservoir at Kissack Cove – occurs on the forest.

Species not mentioned that are of conservation concern.

**Rosy Boa** - *Lichanura trivirgata*, is a species found on the rocky slopes surrounding the Kern River Valley and should be included as it is highly sought after by herpetological collectors.

**Greenhorn Mountains Slender Salamander** - *Batrachoseps altasierrae*

This species was described in 2012 and as a very local endemic must be protected from disturbance within its range. It is found on the western slopes of the southern Sierra Nevada in Kern and Tulare Counties at elevations from 3,900 to 8,200 ft. It has been found in the Greenhorn Mountains north to the Tule River and Kern River drainages, and on the western edge of the Kern Plateau east of the Kern River. The habitat of slender salamanders is wet seepages and springs where it hides under rocks, pine cones, bark, and logs.

**California (Sierra) Newt** - *Taricha torosa* (sierra)

The California newt is found from Breckenridge Mountain north to the Kaweah River where it intergrades with the Sierra Newt. Both species are considered California Species of Concern by the California Department of Fish and Wildlife. These are limited to streams in gray pine/blue oak woodlands.

**Southern Sierra Legless Lizard** - *Anniella campi*

**Southern California Legless Lizard** - *Anniella stebbinsi*

While legless lizards have always been a species of concern, the new understanding of their taxonomic relationships and unique DNA, make protecting this species on the Sequoia National Forest a higher priority than ever. The Southern Sierra legless lizard is found in sandy washes along the South Fork Kern River to the eastside of Walker Pass north to Nine Mile Canyon at elevations between 2600 to 5900 feet. The Southern California legless lizard occurs in sandy soils in the Piute and Tehachapi mountains at elevations of 1300 to 3000 ft. in both oak woodland and mixed conifer forest. Areas with warm, moist, loose soil should be protected from mining, OHVs, and other disturbance to protect these two species. The legless lizard can occur in chaparral, pine-oak woodlands, desert scrub, sandy washes, and stream terraces with sycamores, cottonwoods, or oaks where there is leaf litter, rocks, logs, or even boards for cover.

**Blainville's Horned Lizard** - *Phrynosoma blainvillii* (AKA - *P. coronatum* - Coast Horned Lizard and subspecies)

This California Species of Concern was wide-ranging, but land use conversion, overharvesting, and destruction of harvester ant colonies along with the introduction of the Argentinian ant have caused a rapid decline of this once common charismatic species. The species is still extant in open areas with sandy soil and open vegetation on foothills and semiarid areas in Sequoia National Forest up to 8,000 ft. in elevation. It is not necessarily habitat specific, but does need open areas near ant hills. Harvester ant colonies must be protected from pesticides within the horned lizards range and sandy washes must be protected from mining and OHV use.

**Southern Rubber Boa** - *Charina umbratica*

Listed as a California threatened species by the California Department of Fish and Wildlife, the habitat of the Southern Rubber Boa population, throughout the entire Kern River Ranger District, must be protected from any take by Sequoia National Forest. The rubber boa can be found in oak-conifer and mixed-conifer woodlands where rocks and woody debris are found at elevations from 5,000 to 8,200 ft. It frequently will warm itself at night on roadways.

Thank you for considering these concerns regarding the Inyo NF, Sierra NF, and Sequoia National Forest Plan Revision. Please keep us on the list to receive all documents related to the plan revision process, so we can submit timely input in the process.

Respectfully submitted,



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