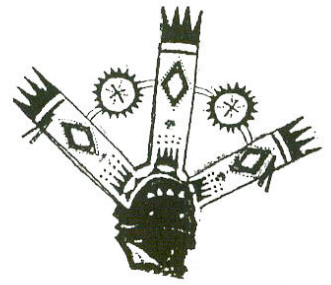




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October 12, 2010

Marit Alanen
US Fish & Wildlife Service
Arizona Ecological Services Office
2321 West Royal Palm Road, Suite 103
Phoenix, AZ 85021
Marit_alanen@fws.gov

RE: **Comments on a Draft Environmental Assessment for the Establishment of a Captive Breeding Pilot Program for the Endangered Mount Graham Red Squirrel**

Comments sent via email to: marit_alanen@fws.gov

Dear Ms. Alanen,

Thank you for the opportunity to comment on the Draft Environmental Assessment for the Establishment of a Captive Breeding Pilot Program for the Endangered Mount Graham Red Squirrel.

The Mount Graham Coalition, Inc., is an international coalition working for ecological preservation of Mt. Graham and other southwestern mountains, riparian areas, and deserts in the region. The mission of Mount Graham Coalition, Inc. is to provide educational and technical assistance to its members and the general public so that they may protect the few remaining natural areas for those plants and animals which exist there, for the sacred nature of these areas, and for the enjoyment of all. We have been active in the protection of Mount Graham – *Dzil Nchaa Si'An* (Big Seated Mountain) – since 1985, and have been incorporated as a non-profit organization since 1993. These comments are submitted on behalf of the Coalition and all of our member groups.

We are also submitting these comments on behalf of the Center for Biological Diversity. The Center for Biological Diversity (“CBD”) is a nonprofit corporation with its primary office in Tucson, Arizona, and with other offices throughout the United States. CBD is actively involved in species and habitat protection issues throughout North America and the World, with over 40,000 members. CBD’s members (including its staff) include Arizona residents with biological health, educational, scientific research, moral, spiritual, aesthetic, and recreational interests in the protection of the Mount Graham ecosystem.

We have read the comments submitted by the Scientists for the Preservation of Mt. Graham for this action. We incorporate them, by reference into these comments.

In General

We understand that the survival of the Mount Graham Red Squirrel as a species is serious danger. Therefore, we understand both the urgency and the desire of the US Fish & Wildlife Service (FWS) to do something to help

the population recover. After all, the Endangered Species Act requires the US Fish & Wildlife Service to take the lead in recovering the Mount Graham Red Squirrel population within the critical habitat designated in 1990. We share those goals. However, the proposed action suggested by the Draft EA is not compatible with the goal of recovery of the Mount Graham Red Squirrel. In fact, the proposed action, if implemented, could be counterproductive and result in the net loss of Mount Graham Red Squirrels (MGRS). While we recognize the need for action, action for the sake of action and without a full assessment of the need, purpose and alternatives is not acceptable.

We strongly object to this or any project moving forward until a new and updated Mt Graham Red Squirrel Recovery Plan is completed, released to the public for comment, finalized, and adopted. This should be your highest priority at this time. Such a plan would provide the context needed to accurately assess whether there is a need to move forward with a captive breeding program and would better guide how this process was planned and implemented.

Lack of available habitat is likely more of a negative factor for the MGRS than reproduction and survival rates. The most important single action that should occur, and that would create more available MGRS habitat in the shortest timeframe, would be the removal of large numbers of the introduced Abert's squirrel from the Pinaleno Mountains. The direct competition between the Abert's and the MGRS is well documented, and goes beyond the issue of the MGRS inability to utilize territory occupied by the larger aggressive Abert's squirrel. It has been documented that the Abert's squirrel robs the middens of red squirrels, and compromises their ability to make it through the winter with an adequate food supply. Even if the MGRS is successful in defending its midden, time spent defending the midden is time not spent increasing its food supply for the tough winter months, and also creates stress for the MGRS, both of which compromise the MGRS short and long-term survival.

Recovery and management of the Mount Graham Red Squirrel is fraught with a history of political interference into agency decisions that have short-circuited good science and has gotten in the way of the US Fish & Wildlife Service doing its job. Most of this interference has been on behalf of the University of Arizona, who in their haste to obtain permission to build a series of structures within Red Squirrel critical habitat, halted the process of environmental analysis that may have mitigated the dire situation the MGRS faces today. This political interference resulted in an aborted Biological Opinion (which would have included more robust information on habitat and recovery needs of the Red Squirrel), a delay in the completion of a recovery plan for the Mount Graham Red Squirrel, and mismanagement of MGRS Critical Habitat to protect the University's investment, to the detriment of the Mount Graham Red Squirrel. In fact, the University's industrial development in Red Squirrel habitat, including the clear cutting of prime habitat and the extensive and unnecessary damage done to the surrounding forest to protect telescopes during the 2004 Nuttall Fire, greatly exacerbated the current dire condition of the Red Squirrel population.

While past decisions are partially "water under the bridge," it is instructive to examine this history to better understand how we arrived at this point, and to avoid making similar short-sighted decisions with this proposed project.

Undertaking a captive breeding program in haste, on the basis of a woefully inadequate Environmental Assessment, leaves too much room for disaster. We urge the US Fish & Wildlife Service to reject this EA, finish all of the science that should have been done 20 years ago, and then prepare a new environmental impact statement to give US Fish & Wildlife Service decision-makers a better and more scientifically supported range of alternatives.

It is troubling to us that the US Fish & Wildlife Service is rushing to approve this plan without adequate public involvement. It appears that the FWS has not only purchased much of the equipment for the preferred alternative, but has already put in motion actions and decisions that should have only been made after a final decision on this action is made. In the end, jumping the gun like this will only make it more difficult for a good decision to be made.

Captive breeding programs, even when well thought out and with a clear need for action, are to be approached with a great deal of caution. In this case, we are dealing with the most endangered mammal in the United States. We only get one chance to do it right. An incorrectly perceived need for hasty action could have disastrous consequences for the Red Squirrel. Even if the program succeeds, there is still the larger question to be answered as to whether the resultant population of Red Squirrels are truly wild and free Red Squirrels or some variant of squirrel with wildly different behavior patterns that could forever alter the Squirrel's destiny. For example, while the FWS captive breeding program for the California Condor in California has been successful in adding additional condors to the population, it has undeniably led to a radically different population of condors in the wild than what previously existed.

Supplemental feeding

It is impossible to conduct a captive breeding and release program without supplemental feeding. The EA alludes to this fact, but glosses over it. Supplemental feeding has been tried before, with disastrous consequences for the Red Squirrel population. Anything that involves supplemental feeding needs a separate and full assessment by FWS to ensure that further jeopardy to the MGRS is not the result.

Religious Freedom

The Mount Graham Red Squirrel is integral to the religious freedom of Native American Tribes practicing on Mount Graham. Full consultation (and approval) with the affected Tribes is necessary before this plan can be approved. There is no mention of consultation in this document.

Habitat preservation

Habitat preservation and restoration remains the best long-term answer to the continued existence of the MGRS. This captive project – if implemented – should not replace efforts to protect and restore MGRS habitat. There is no discussion of aggressive habitat enhancement and recovery.

Specific Comments

Section I B & C

The purpose and need for this action are not valid. The reasoning in the EA for the purpose and need are circular. All actions made by FWS regarding the Mount Graham Red Squirrel should further the goal of recovery of the species across its entire critical and suitable habitat. The need and purpose of any action should be weighed against this goal. Instead, in this EA, the need is not recovery of the species, but an incorrectly perceived “need” to develop captive husbandry techniques and release protocols. This may or may not achieve the goal of recovery of the Red Squirrel. The stated purpose of the action is to support the “need.” Therefore, the public and decision-makers do not have a clear picture of whether this action actually serves the purpose of species recovery, only that the purpose of the proposed action meets the stated “need.” There needs to be discussion of how this action should meet the goal of species recovery, not the need to fulfill a science project.

Section II

Without the benefit of a full EIS and the completion and release of a valid biological opinion, a recovery plan, and the conclusions of all related federal actions, (Special use permit renewal EIS, PERP, etc) we cannot determine a full range of alternatives. It is probably that the completion of these documents would add a range of other alternatives.

The EA does not make clear exactly what the No action alternative is. Since there are number of federal actions that may or may not happen before this plan is approved or rejected, and before a preferred alternative is implemented, there are a number of other possible actions that could change the baseline of “no action.” Since this EA is so vague, it is not correct for the EA to state that the purpose and need for the proposed action would not be met since we don’t really know what exactly the no action alternative is.

At minimum, the no-action alternative should discuss other projects and actions currently being implemented, or proposed for the future that are of benefit to the MGRS. It is probable that final versions of the Mount Graham Red Squirrel recovery plan, the Pinaleño Ecosystem Restoration Project, and other federal actions could substantially alter the current, unclear, no action alternative.

Alternative B

Alternative B is not clear as to exactly what the plan would be.

A major fault with Alternative B is that there is no backup plan or redundancy. Should the alternative fail, there is no recourse.

Before an Alternative like B or C be implemented, more information is needed on the MGRS. For example, a captive breeding program should be preceded by a full inventory of middens and a comprehensive population viability assessment. The Species Survival Commission Conservation Breeding Specialist Group has expressed interest in being invited by FWS to conduct such a study.

At a minimum, if Alternative B is to move forward there must be a threshold for the number of squirrels that can be captured in any one year, as well as a process for determining conditions that would set this number. The EA suggest that up to 10% of the population could be removed in any single year. We believe 10% is much too high,

and this number, without any explanation as to how it was arrived at, renders it arbitrary and useless – not to mention dangerous to the continued survival of the MGRS.

Other alternatives were improperly rejected. Had there been a valid need and purpose statement for this action, Alternatives D and E and other unknown alternatives could have better achieved the purpose of recovery of the Mount Graham Red Squirrel.

Alternative D

In particular, Alternative D deserves more discussion. It would make a great deal of sense to experiment with captive breeding and release with a similar population that is not in such dire straits.

The EA later states, “Alternative D involved establishing a captive breeding pilot program using up to 16 Mogollon red squirrels from the White Mountains, Arizona, instead of Mt. Graham red squirrels. The White Mountains support the nearest population of red squirrels to the Pinaleno Mountains. These squirrels share similar life-history traits with the Mt. Graham red squirrel, and therefore could act as a surrogate for the Mt. Graham subspecies in developing captive husbandry, rearing, breeding, and release techniques.”

The EA states that “husbandry requirements for successfully rearing this subspecies in captivity and releasing individuals back into the wild are currently unknown,” and that a primary purpose of the proposed action is to “develop captive husbandry, rearing, and breeding techniques for the Mt. Graham red squirrel, as well as protocols for release of squirrels into the wild.” This could be done with no risk to the MGRS by the implementation of Alternative D.

New Alternative

We favor a new alternative predicated on the need for action being the recovery of the species and not the need as stated. This alternative would be a mix of a number of features including:

- Begin with a comprehensive population Viability assessment
- Aggressive removal of introduced Abert’s squirrels from all suitable MGRS habitat
- Fire management that would prioritize the protection of habitat
- No more degradation of MGRS habitat
 - Removal of the bible camp and summer cabins in MGRS habitat as called for 20 years ago.
 - An end to discussion of paving the Swift Trail
- Enhancement of existing habitat
 - There should be good ideas that could be implemented in the Final Pinaleno Ecosystem Restoration Project
- Establishment of additional population nodes in suitable, but unused MGRS habitat on Mount Graham
- Alternative D, an experimental captive breeding and release program using White Mountain Red Squirrels to gain experience and knowledge should a captive breeding program be necessary for the MGRS.
- A backup emergency plan to remove all or significant portions of MGRS in case of a catastrophic event such as a fire that would immediately jeopardize the entire population.

Connected and cumulative activities

The EA states “areas treated through PERP may be considered as potential release sites for captive red squirrels to determine if these areas can or will provide habitat;” We strongly object to MGRS being used to assess habitat suitability for an experimental restoration project. If MGRS are released into PERP treatment areas in the future, it should only occur after it has been shown that PERP has had no effect on existing squirrels currently found within proposed PERP treatment areas.

If this project is to move forward, we strongly support the process outlined in Alternative D and **strongly object to the use of the highly endangered Mt. Graham red squirrel in such a reckless and experimental fashion.**

Conclusion

Due to the highly endangered status of the MGRS, this draft EA should be rejected and a full Environmental Impact Statement should be prepared after (or in conjunction with) all connected and related federal actions currently in process are completed, in particular, the Mt. Graham Red Squirrel Recovery Plan.

The need and purpose for this action is fatally flawed.

We have proposed another hybrid alternative that should be seriously considered as the preferred alternative that includes removal of Abert’s squirrels, protection of existing habitat, habitat enhancement, a change in fire management, and a captive breeding program using White Mountain red squirrels instead of MGRS.

Thank you for this opportunity to comment on the Draft EA. Please keep us informed one this action and any other actions involving the Mount Graham Red Squirrel.

Sincerely,



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