Dear Messrs. Zinke, Sheehan, Spangle and Gray, and Ms. Lueders,

RE: Petition to revise the January 5, 1990, Mount Graham Red Squirrel Critical Habitat to reflect the current change in status of the squirrel and its habitat.

**CURRENT STATUS OF MOUNT GRAHAM’S SPRUCE-FIR FOREST**

The Mount Graham Red Squirrel has survived in isolation on Mount Graham since the retreat of the continental glaciers 11,000 or more years ago at the end of the Pleistocene. Now only about 35 Mount Graham Red Squirrels survive on Earth.

Historically, the summit’s spruce/fir association has contributed “most of the excellent food habitat”\(^1\) that has allowed the squirrel to survive long term on Mount Graham. In 1988, approximately 615 suitable acres of the estimated 700 historical acres of the pure spruce/fir association forest remained.\(^2\) Now very little of the high elevation, essential spruce-fir habitat survives. Very little spruce-fir forest survives owing to (1) habitat destruction by wildfire, (2) habitat destruction by firefighting efforts focused on the protection of telescopes and structures as opposed to protection of endangered Mount Graham Red Squirrel habitat, and (3) habitat destruction by unnecessary back burning resulting from pressure on fire fighters by University of Arizona astronomers.

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\(^2\) Ibid.
The following October 15, 1989, aerial photograph of Mount Graham shows the summit’s previously un-impacted continuous canopy of spruce-fir forest on the middle left of the image PRIOR to telescope construction. The image looks to the East to the High Peak summit from the old blow down scar on the middle left of the image. The telescopes were ultimately to be sited just to the right and on the opposite side of the blow down scar:
The following November 7, 2010, aerial photograph of Mount Graham looks to the East from the telescopes to High Peak. The image shows the effects of firefighting and the inappropriate, unnecessary, July 8, 2004, back burning to the East of the telescopes. The unnecessary back burning destroyed cone producing spruce-fir forest essential for the Mount Graham Red Squirrel that was recovering from a recent spruce beetle infestation. The image also documents unapproved, illegal clearing around the Large Binocular Telescope that should have triggered reinitiation of consultation between USFS and USFWS for exceeding the installation’s contractual 8.6 acre limitation.

The spruce-fir forest vegetation type contributed most of the historically excellent food habitat for the Mount Graham Red Squirrel. In 1988, approximately 615 acres of pure spruce/fir association forest of the estimated 700 historically present acres survived:

“Mount Graham Red Squirrels have been called “spruce squirrels” because of their strong association with forests containing spruce and Douglas-fir (formerly known as Douglas spruce)...

In 1988, approximately 615 suitable acres of the estimated 700 acres of the pure spruce/fir association forest remained...

In summary, Engelmann spruce is the most important species of tree supplying food to the squirrel. Corkbark fir, in association with Engelmann spruce,
has second importance. The spruce/fir association is the vegetation type contributing most of the excellent food habitat..."³

At least 250 acres of the total 615 acres of spruce-fir habitat, critically important for the Mount Graham Red Squirrel, were unnecessarily destroyed on July 8, 2004, as the astronomers pressured Nuttall Complex fire firefighters to back burn the spruce-fir forest from Emerald Peak to High Peak. At the time, the winds were blowing away from telescopes towards the wildfire. In other words, the wild fire would have needed to move against or into the wind in order to reach the telescopes.

The unnecessary torching took place from the west to the east with the wind blowing from the west towards the east into the face of the wildfire.⁴:

The following satellite image, from SEPTEMBER 19, 2003, PRIOR to the 2004 Nuttall Complex fire, shows the NOT YET TORCHED, contiguous old-growth spruce-fire forest with superimposed, August 7, 2004, fire lines, wind direction and wild fire locations:

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The following satellite image, from AUGUST 11, 2004, AFTER the 2004 Nuttall Complex fire, shows the blackened, TORCHED old-growth spruce-fire forest with the August 7, 2004, fire lines, and August 8, 2004, wind direction and wild fire locations:

The following aerial image, from November 7, 2010, shows the unnecessarily torched spruce-fir forest from the LBT to High Peak. The August 7, 2004 fire lines and the August 8, 2004, wind direction and wild fire locations are superimposed.
Prior to the Nuttall Complex fire, the spruce-fir in the area of the telescopes was recovering from its earlier spruce-beetle infestation and was starting to produce cones again.5

Even before the astronomers’ focused pressure on firefighters to destroy forest near the telescopes, firefighting activities were already prioritized towards protecting telescopes as opposed to protecting endangered Mount Graham Red Squirrel habitat. Documentation of the Forest Service’s prioritization can be found in the Forest Service’s July 3, 2004, Nuttall Complex Wildland Fire Situation Analysis.6 Protection of endangered Mount Graham Red Squirrel habitat was not the priority:

“The alternative selected is designed to give consideration to fire fighter safety while minimizing loss to Mt. Graham International Observatory. Heliograph Peak Electronic Site, recreation residences and developed recreation facilities.”

The firefighters’ firefighting priority uses a rating system with the highest priority rating, “high = 10.” The telescopes were prioritized as their highest priority:

“Economic…Mt. Graham International Observatory…[Priority high = 10]…10.”

In contrast, protection of endangered Mount Graham Red Squirrel habitat was prioritized lower:

“Environmental…T&E Species…This location is the only habitat for the Mt. Graham Red Squirrel…[Priority high = 10]…8.”

In addition to our documentation of the spruce-fir acreage destroyed needlessly,7 Mount Graham Red Squirrels confirmed to have been killed by other telescope related activities have already been quantitatively documented twice. In 1996, with the Clark Peak fire, and again in 2004, with the Nuttall Complex fire, firefighting efforts related to the telescopes, independent of firefighting efforts to protect squirrel and forest, killed squirrels whose deaths could be documented. In 1996, Clarke Peak fire telescope related activities killed at least seven endangered red squirrels.8 In 2004, Nuttall Complex fire telescope related activities killed at least seven endangered red squirrels, one who was lactating (i.e., she had babies).9

5 Personal communications with (1) Dr. Robert Witzeman, including as photographically documented, May 22, 2003, (2) with Sky Island Alliance Executive Director David Hodges, November 6, 2010; and (3) with two agency officials, one Forest Service and the other USFWS on November 8, 2010 (neither who wants their name publicly disclosed owing to fear of their agencies’ retribution).
7 Notice of Intent to Sue, Center for Biological Diversity, December 22, 2010.
In rare instance of agency candor, likely the result of an administrative editorial lapse, the Forest Service summarizes, though still understates, the effects of structure-related firefighting to the detriment of the essential Mount Graham Red Squirrel habitat. In February 2010, the Forest Service observed,

“The MGIO and other modern developments on the mountain have precipitated aggressive firefighting techniques, and inhibited the restoration of the natural ecosystem processes.”

The following aerial image, made on November 7, 2010, shows a focused image of the unnecessarily destroyed 250 acres of spruce-fir forest east from the Columbus, now renamed the Large Binocular Telescope (LBT), to just west of High Peak. Also note the illegal clearing around the LBT that should have already triggered reinitiation of consultation between USFS and USFWS for exceeding the installation’s contractual 8.6 acre limitation.

Trees are a known problem for astronomers. Mount Wilson astronomers Laird Thompson and Scott Tear summarize the problem:

“…pines growing close to the telescope distort the air and disrupt their research…”

“The Forest Service won’t allow them to cut the pines…”

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“The trees also produce sticky pollen that coats the huge 100-inch mirror at the telescope's base...”


Until recently, the trees around the Mount Graham telescopes have similarly been a problem for Mount Graham astronomers:

"[Mount Graham] Air Quality...Existing Situation...Natural additions to the air come from...terpenes from conifers, dust from wind action, spores, and pollen." 11

"Cerro Pachon appears quite similar to Mauna Kea, with very little turbulence. The effect of trees on Mt. Graham is quite pronounced." 12

"Without the topping of the trees in the viewpath the submillimeter telescope cannot function." 13

"Considering trees, trees tend to hold in cold air near the mountain surface, creating a reservoir of cold air, whereas barren mountain surfaces are more readily swept clean of their cooled surface air. Thus, somewhat less turbulence is associated with a mountain having few trees." 14

"Those of us with forested mountains in southern Arizona often look enviously at the photographs of treeless Cerro Paranal...The trees have the effect of raising the turbulent boundary layer from the ground to the top of the tree canopy...I joke that we have found the solution to this problem of trees when the Clark Peak forest fire started on Mt. Graham..." 15

By successfully pressuring fire fighters to needlessly destroy the spruce-fir forest by the telescopes, Mount Graham astronomers have successfully “found the solution to this problem” for “years to come”:

"Thursday, July 08 23:00 MST...The Observatory is in excellent shape -- all perimeter lines have been burned out and it rained a bit on site today. The high humidity and low wind on the mountain reduced the intensity of fire considerably. We are in a very defensible position (and that's for years in the future)...Cheers..."

(News Brief, Thursday, July 08 23:00 MST, John R. Ratje, Site Manager, Mount Graham International Observatory. http://kp12m.as.arizona.edu/new_articles/nuttall_fire_2004/News_Briefs/news_brief_070804b.htm.)

Not surprisingly, when USFWS did a June 8, 2007, retrospective Biological Opinion on the Nuttal Complex fire, there was no analysis of the prioritization of the firefighting of telescopes to the detriment of Mount Graham Red Squirrel habitat. The Biological Opinion contains no details necessary to objectively evaluate the tragic, unnecessary loss of the 250

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11 Ibid.
13 Correspondence, from USFWS Regional Director Michael Spear, to USFS Regional Forester David Jolly, RE: Withdrawal of the request for additional acreage for road widening and viewpath clearing may be inappropriate as documentation exists to show both proposals may be needed, September 19, 1989.
15 The LBT Project, JM Hill, UA Steward Observatory, 1996.
acres of spruce-fir essential for long-term Mount Graham Red Squirrel. Incredulously, USFWS concluded:

"After reviewing the current status of the MGRS and its associated critical habitat, the environmental baseline for the action area, the effects of the actions taken to suppress and rehabilitate the Nuttall-Gibson Complex Fire, and the cumulative effects, it is our biological opinion that the actions, as described, neither jeopardized the continued existence of MGRS, nor resulted in destruction or adverse modification of MGRS critical habitat."  

So is spruce-fir no longer necessary for Mount Graham Red Squirrel survival and recovery? Of course it is. And was there no adverse modification of Critical Habitat by Nuttall Complex fire firefighting focused on telescope protection? Of course there was, notwithstanding obvious lack of USFWS' objectivity and professionalism to deny it.

PETITION TO REVISE CRITICAL HABITAT TO REFLECT CURRENT STATUS

On January 5, 1990, when USFWS designated Critical Habitat for the Mount Graham Red Squirrel, the potential extent of the loss of spruce-fir forest habitat at the highest elevation was not known. Very little spruce-fir forest now survives owing to (1) habitat destruction by wildfire, (2) habitat destruction by firefighting efforts focused on the protection of telescopes and structures as opposed to protection of endangered Mount Graham Red Squirrel habitat, and (3) habitat destruction by unnecessary back burning resulting from pressure on fire fighters by University of Arizona astronomers.

The January 5, 1990, Critical Habitat designated only high elevation spruce-fir forest:

"This squirrel is now found at the highest densities in Engelmann spruce (Picea engelmannii) and/or fir, especiall corkbark fir (Abies lasiocarpa ver. Arizonica)…

Critical habitat is being designated for the Mount Graham red squirrel to include tree areas in the Coronado National Forest…Hawk Peak/Mount Graham, Heliograph Peak, and Webb Peak…

Hawk Peak-Mount Graham Area. The area above the 10,000-foot…contour surrounding Hawk Peak and Plain View Peak, plus the area above the 9,800-foot…contour that is out of lines extending from the highest point of Plain View Peak…

Heliograph Peak Area. The area on the north facing slope of Heliograph Peak that is above the 9,200 foot…contour surrounding Heliograph Peak…

Webb Peak Area. The area on the east-facing slope of Webb Peak that is above the 9,700-foot…contour…

16 Biological Opinion on the wildfire-suppression actions associated with the Nuttall-Gibson Complex Wildfire, AESO/SE 02-21-04-M-299, June 8, 2007.
The major constituent element is dense stands of spruce-fir forest.18

Currently designated Critical Habitat does not include the lower elevation forest where all Mount Graham Red Squirrels now survive. Currently designated Critical Habitat fails to include habitat “essential to the conservation of the species” required by 16 U.S.C. § 1532(5).

Ironically, on August 1, 1990, USFWS acknowledged that its January 5, 1990, designated Critical Habitat failed to include habitat “essential to the conservation of the species,” as required by law. On August 1, 1990, USFWS produced a Biological Opinion Update recognizing the importance of habitat and migration corridors beyond the highest elevation spruce-fir forest designated as Critical Habitat.19

The August 1, 1990, USFWS Biological Opinion Update observes:

"An important function of the spruce/fir habitat type appears to be to provide a good "boom" in the "boom and bust" population fluctuations typical of red squirrels. By itself, however, this habitat type is not sufficient to maintain the population over long time periods. Other habitat types are needed to carry the squirrels through regular periods of low population size. As each habitat type is important at different times, the significance of the loss of part of a given habitat type should be considered relative to the amount of available habitat of that type. The proposed [telescope] project would remove old-growth trees from a spruce/fir habitat type that is limited to less than 800 acres above 10,200 ft. elevation.

The biological opinion did not consider the importance of different habitat types whose quality is continually shifting to the degree now known. The opinion erroneously considered the spruce/fir forest to be essentially the only occupied habitat type during periods of very low population size…

The Ash Creek drainage [site of the Columbine summer homes and the Arizona Bible Camp] contains the major block of good habitat for red squirrels outside of the spruce/fir forest. Other blocks of similar habitat have been degraded by logging. The old-growth forest of Douglas-fir and white fir provide the cool, wet conditions required for long-lasting middens. In years of good cone crops of Douglas-fir (and, to a lesser extent, white fir), this habitat type presumably provides conditions for high rates of survival and reproduction. Because it is lower in elevation than the spruce/fir habitat, it is generally warmer. In the Ash Creek drainage, many areas have a northern or eastern exposure, which probably compensates somewhat for the lower elevation…

The Douglas-fir/white fir habitat type in the Ash Creek drainage is in relatively close proximity to and is contiguous with two prime areas of spruce/fir forest: Webb Peak to the west and, to the southeast, Emerald Peak, Hawk Peak, and High Peak. These areas are arrayed roughly linearly, from Webb Peak in the northwest to High Peak in the southeast. Significant roads, firebreaks, and clearings exist in the spruce/fir forest above 10,200 ft. elevation on Emerald Peak, Hawk Peak, and High Peak , accounting for an estimated 13% loss of this habitat…

18 Ibid.
Significance:

Regular dispersal between the Ash Creek drainage and the main stand of spruce/fir forest to the southeast focuses attention on the need for good dispersal habitat joining these areas. Emerald Peak lies at this junction...The importance of good dispersal habitat was not realized at the time of preparation of the biological opinion...

In summary, the Team believes that reinitiation of consultation is warranted based on three forms of new biological information:

- The population density in the spruce/fir forest has declined to an extremely low level.

- Dispersal among areas apparently is an important aspect of the ecology of the Mount Graham red squirrel. Substantial fragmentation of the habitat inhibits dispersal and is likely to increase mortality among dispersers...

Part of the terms and conditions of reasonable and prudent alternatives 2 and 3 included the provision that the Special Use Authorizations (SUA) for 14 summer cabins and the Church of Christ Bible Camp not be renewed in 1992, and the facilities removed to permit reforestation of the area. Forest Service regulations allow for the removal of such facilities over a several year span after the permit period ends. The acreage available at these sites totaled 17 acre (14.5 acres of homes and 2.5 acres of camp). The removal of these facilities would have allowed for the removal of a road that currently divides the Webb Peak and Emerald Peak habitats thus gaining additional acreage. The opinion assumed that reforestation of these areas would begin prior to 2002...

4. EVALUATION OF CRITICAL HABITAT DESIGNATION

Critical habitat refers to the specific areas within the geographical area occupied by a species at the time it is listed on which are found those physical and biological features essential to the conservation of the species (50 CFR 424.12). Conversely, areas not included as critical habitat are not considered essential to the conservation of the species. The critical habitat that has been designated does not include hundreds of acres of occupied habitat in the Ash Creek drainage, below the critical habitat line on Webb Peak, near Grandview Peak, and possibly other areas. Additionally, it does not include dispersal habitat believed essential to conservation of the squirrel. There are middens in these areas, so obviously favorable physical/biological features are present. Given that the Mt. Graham red squirrel is in a precarious state and in light of new information the Team believes that a review of the critical habitat designation is warranted.

5. RECOMMENDATIONS

In light of the findings that three of the criteria found at 50 CFR 402.16 have been met the Team recommends that reinitiation of consultation be requested for the forest plan and the astrophysical plan.
In addition, it is recommended that the sufficiency of the critical habitat designation be reviewed."\(^{20}\)

Firefighting efforts influenced by astronomers to protect their telescopes destroyed extensive amounts (41%) of surviving high elevation spruce-fir designated as Critical Habitat. This is clearly documented here and elsewhere\(^{21}\) in spite of USFWS' unprofessional and obviously dishonest conclusion in the June 8, 2007, Biological Opinion on the Nuttall Complex fire that the Nuttall Complex fire firefighting efforts to protect telescopes did not "[result] in destruction or adverse modification of MGRS critical habitat."\(^{22}\)

With the 2017, Frye fire, even more essential Mount Graham Red Squirrel habitat has been destroyed. Little is known yet regarding firefighting priorities or specific Mount Graham Red Squirrel deaths resulting from telescope protection activities as documentation has not been made public yet by the Forest Service. We await response to our outstanding Freedom of Information Act request.

What we do know that the Mount Graham Red Squirrel population numbers are now critically low. And we now also know that the surviving squirrels are found primarily in four areas, all outside of the upper elevation spruce-fir forest now designated as Critical Habitat. These four areas are the Grant Hill area, the Riggs Lake area, Turkey Flat, and Columbine.

The February 10, 1988, Expanded Biological Assessment proved prophetic:

"In endangered species the key to persistence may be "hot spots" of the habitat (Diamond 1975). These hot spots are places where the mean growth rates at low density are consistently positive. Thus the hot spot may serve as a refugia where the assurance for persistence in the entire range arises…In the Pinalenos, there are four locations that could serve as hot spots with the Mt. Graham area being the largest and most spruce-fir based. The other possible locations are Columbine/Ash Creek, Heliograph Peak and perhaps Webb Peak."\(^{23}\)

The May 3, 1993, Mount Graham Red Squirrel Recovery Plan also speaks to the necessity of protection and restoration habitats beyond spruce-fir:

"The most important step in preventing short-term extinction is to protect existing habitat from further loss or fragmentation. Protection of suitable habitats will be a major priority in efforts to increase and stabilize the Mt. Graham red squirrel population. Even small losses of habitat are of concern, especially in light of habitat losses to natural causes that are likely to occur and the precarious situation of a fragmented forest…

Protection and restoration of habitat. This is the most important factor for continued survival of the Mt. Graham red squirrel. Because habitat is limited, further habitat losses could cause extinction in the near future. Many areas of potentially suitable habitat are degraded.

\(^{21}\) http://www.biologicaldiversity.org/species/mammals/Mount_Graham_red_squirrel/pdfs/NOI%2020101222%20FINAL_PDF
\(^{22}\) Biological Opinion on the wildfire-suppression actions associated with the Nuttall-Gibson Complex Wildfire, AESO/SE 02-21-04-M-299, June 8, 2007.
Restoration of degraded areas is essential…

As stated above, the squirrels are now found at four locations. These four areas are the Grant Hill area, the Riggs Lake area, Turkey Flat, and Columbine. All these elevations are outside of and lower in elevation than the currently designated Critical Habitat.

The following aerial of the Ash Creek drainage area and the Columbine area show that not only is the area essentially intact, but that its restoration as Mount Graham Red Squirrel habitat is now more important than ever. The following November 2, 2017, Mount Graham aerial looks to the East from the Ash Creek drainage/Columbine area to the Large Binocular Telescope, and High Peak in the left upper corner of the image. Heliograph is visible in the right upper corner. The parking lot of the Forest Service Columbine work station is visible in the lower right side of the image.

© Robin Silver Photography

The following November 2, 2017, Mount Graham aerial looks to the north across Grant Hill and Hospital Flat to the Large Binocular Telescope in the upper middle of the image and High Peak in the upper right.
INADEQUACY OF THE CURRENTLY DESIGNATED CRITICAL HABITAT

As quoted above, the inadequacy of the currently designated January 5, 1990, Critical Habitat was reviewed and recommended for revision in the USFWS, August 1, 1990, Biological Opinion Update.25

Subsequently, even in the June 8, 2007, Biological Opinion on the wildfire-suppression actions associated with the Nuttall-Gibson Complex Wildfire, USFWS states,

"With the loss of most of the spruce-fir forest, the mixed conifer zone is now much more important for survival of the MGRS; however, most of that forest type is not designated as critical habitat." 26

With the latest Mount Graham Red Squirrel survey numbers, and with the latest aerial documentation of loss of spruce-fir forest habitat and designated Critical Habitat included in this correspondence, designated Critical Habitat must be revised.

16 U.S.C. § 1532 Title 16 – CONSERVATION…CHAPTER 35 – ENDANGERED SPECIES states:

“Definitions…

For the purposes of this chapter…

(5)(A) The term “critical habitat” for a threatened or endangered species means--

(i) the specific areas within the geographical area occupied by the species, at the time it is listed...(I) essential to the conservation of the species and…

(ii) specific areas outside the geographical area occupied by the species at the time it is listed, upon a determination that such areas are essential for the conservation of the species…”

Currently designated Critical Habitat does not contain areas essential for the conservation of the species so revision will certainly benefit the Mount Graham Red Squirrel. Criteria for designating critical habitat is defined in 50 C.F.R. § 424.12. This regulation defines the criteria for designating critical habitat as prudent and determinable, specific areas occupied by the species at the time of listing and specific areas outside the geographical area occupied essential to the conservation of the species.

DESIGNATION OF CRITICAL HABITAT IS PRUDENT

Circumstances have changed significantly since USFWS’ January 5, 1990, designation of Critical Habitat for the Mount Graham Red Squirrel. Revision of Critical Habitat does not subject the squirrel to increased risk of harm as it does not change any of


the risks already identified in the previous Biological Assessment,²⁷ multiple Biological Opinions,²⁸ in the Biological Opinion Update,²⁹ and the current Critical Habitat designation.³⁰

Revision of Critical Habitat will provide substantial conservation benefit to the squirrel. In order to provide for survival and recovery the revision should include currently designated higher elevation spruce-fir as well as all currently occupied mixed conifer, and all historically occupied habitat. Such designation will not only provide for survival and recovery, but will also better identify habitat to be prioritized for protection.

In summary, designation of all occupied and historically occupied habitat is prudent and necessary to insure survival and recovery.

DESIGNATION OF CRITICAL HABITAT IS DETERMINABLE

The habitat of the Mount Graham Red Squirrel has been studied intensely and defined in detail for more than 30 years.³¹ As a result of this cumulated knowledge there is no question that Mount Graham Red Squirrel critical habitat is determinable. Multiple studies define historical habitat and Mount Graham Red Squirrel distribution.³² Multiple

studies provide for an understanding of the primary constituent elements that make up Mount Graham Red Squirrel habitat and midden sites.  

**RECOMMENDED CRITICAL HABITAT**

Please reference the studies cited in the last section regarding Mount Graham Red Squirrel habitat and midden distribution. In general, we recommend designation of critical habitat in mixed conifer and spruce fir forest above 7,500 feet (2,286 m) as noted primarily by Hatten 2009, as cited in the draft Recovery Plan (2011). What is not general, and most important here, is inclusion of the areas currently occupied by the Mount Graham Red Squirrel. These areas are the Grant Hill area, the Riggs Lake area, Turkey Flat, and Columbine.

**CONCLUSION**

The Mount Graham Red Squirrel (*Tamiasciurus hudsonicus grahamensis*) is one of the rarest and most imperiled animals on Earth. Only about 35 survive. Piecemeal loss of its habitat continues to be the greatest threat to the squirrel.

This correspondence petitions USFWS to revise its inadequate, January 5, 1990, designated Mount Graham Red Squirrel Critical Habitat.


Pursuant to Section 4(b)(3)(D) of the Endangered Species Act, 16 U.S.C. § 1533(b)(3)(D)(i) and (ii), we expect to hear from you within 90 days, on March 14, 2018, with confirmation that this petition contains substantial scientific information indicating that the revision is warranted. In addition, within 12 months, on December 14, 2018, we expect that you publish in the Federal Register your revision to the current, inadequate designated Critical Habitat. Since this is an emergency situation, please note that, pursuant to 16

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U.S.C. § 1533(b)(7), you are allowed, and we add, morally and professionally obligated, to designate earlier Critical Habitat.

If you have further questions, please contact Robin Silver, M.D., Center for Biological Diversity, P.O. Box 1178, Flagstaff, AZ 86002, by mail; by phone: (602) 799-3275, or by Email: rsilver@biologicaldiversity.org.

Sincerely,

[Signature]

Robin Silver, M.D.
Co-Founder and Board Member
Center for Biological Diversity