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February 16, 2016

Public Comments Processing
Attn: Docket No. FWS–HQ–ES–2015–0169
U.S. Fish and Wildlife Service MS: BPHC
5275 Leesburg Pike
Falls Church, VA 22041–3803

Re: Comments on Draft Methodology for Prioritizing Status Reviews and Accompanying 12-Month Findings (Docket #: FWS–HQ–ES–2015–0169)

Please accept the following comments from our organizations in response to the U.S. Fish and Wildlife Service’s (“Service”) proposed *Draft Methodology for Prioritizing Status Reviews and Accompanying 12-Month Findings* (hereafter “Draft Methodology”).¹ We strongly support prioritizing the protection of our nation’s most critically endangered species, and moving as quickly as possible to fully protect those species under the Endangered Species Act (“ESA”). Many of our organizations have worked for years to identify species at grave risk of immediate extinction — such as the Lassics lupine, Mohave shoulderband snail, Miami tiger-beetle, Peñasco least chipmunk, Amu Darya sturgeon and pygmy three-toed sloth — as well as highlighting major geographic areas where endangered species have consistently been overlooked by the Service, like the freshwater environments of the Southeast United States. We are deeply concerned that the Draft Methodology is too vague and will not result in the most imperiled species being protected first. Instead, it is more likely that the Draft Methodology will only encourage the Service to fall back into its bad habits of letting politics and industry special interests dictate which species are and are not protected.

We are concerned that an overly-elaborate, cumbersome prioritization system will divert the Service’s “limited resources”² away from the core activities of the listing program. Rather than protecting imperiled species, scarce dollars will be spent rearranging deck chairs assessing and ranking these species. We are also concerned that States will undertake half-hearted measures to conserve species in the hopes of deferring listing while trying to game the system by avoiding the tough choice and required conservation measures to *actually* recover those imperiled species. The Draft Methodology, as currently framed, will undermine the integrity of the listing program, lead to less credible listing determinations, and more litigation. We offer several specific comments on the Draft Methodology, as well as the Service’s listing workplan for FY 2017 and beyond.

¹ *Draft Methodology for Prioritizing Status Reviews and Accompanying 12-Month Findings on Petitions for Listing Under the Endangered Species Act*, 81 Fed. Reg. 2,229 (Jan. 15, 2016) (hereafter “DRAFT METHODOLOGY”).

² *Id.* at 2231.

I. The Draft Methodology Does Not Explain How Critically Imperiled Species Will be Identified.

The Service offers no explanation at all of *how* it will identify “critically imperiled” species in the Draft Methodology for “Bin 1.”³ The Methodology asserts that species are critically imperiled if they “need immediate listing action in order to prevent extinction” and are facing “severe” threat levels across a “majority” of their range. These species will be given highest priority.⁴ None of these terms are defined or explained at all, and there is no indication of how the Service will decide if threats are “severe” or not. Given the Service’s narrow and illegal interpretation of “range,” it will also be impossible to determine when a species faces threats across a majority of its range versus the species being considered “extinct” in the Service’s opinion. With over 500 species having overdue 12-month findings, ranking all of them could become a very expensive and resource intensive process. It appears that the Service has two basic options (1) collect additional data and information to identify critically imperiled species or (2) rely on existing information on the species to identify critically imperiled species.

We believe that the second option is better. It is not a good use of the Service’s limited resources to collect data and conduct detailed analyses to identify critically imperiled species that have received positive 90-day determinations. Instead, we recommend that the Service develop a simple, transparent, and cost-effective rapid assessment that can quickly identify which species are critically imperiled. The Service has several choices. First, each species could be ranked based on the magnitude and imminence of threats using a scheme similar to the Listing Priority Number,⁵ and include all species that receive a score of 1-4 in Bin 1. However, this option is not completely transparent, prone to abuse, and could lead to more litigation.

Second, the Service could use the same methodology included in past Candidate Notice of Reviews (“CNOR”). For example, between 2007 and 2011, the Service identified: “species with the highest IUCN rank (critically endangered), the highest Heritage rank (G1), the highest Heritage threat rank (substantial, imminent threats), and currently with fewer than 50 individuals, or fewer than 4 populations” to prioritize first for listing. Using a similar approach, these species should be placed in Bin 1 and listed first.⁶ We recommend this, or a similar approach, as it is transparent, science-based, and cost-effective. There are certainly other methodologies that could be used to prioritize species, but the Service should not waste resources reinventing the wheel here, nor should the Service simply make this determination in an entirely non-transparent way. We request that the Service specifically provide the public an actual explanation of how it will identify “critically imperiled” species in the Final Methodology.

Next, the Service also offers no explanation of *how* it will evaluate information leading into placement of a species in Bin 2 — species with “strong” data available — versus Bin 5 — species with “limited” data.⁷ These vague criteria appear to be self-fulfilling prophecies, rather than a clear, transparent standard that dictates a course action. Under the current proposal, if a species is

³ *Id.* at 2230.

⁴ *Id.*

⁵ *See, Listing and Recovery Priority Guidelines*, 48 Fed. Reg. 43098 (Sept. 21, 1983).

⁶ *See, e.g., Review of Native Species That Are Candidates for Listing as Endangered or Threatened; Annual Notice of Findings on Resubmitted Petitions; Annual Description of Progress on Listing Actions*, 76 Fed. Reg. 66370, 66380 (Oct. 26, 2011).

⁷ DRAFT METHODOLOGY at 2230-2231.

politically sensitive, the Services can assert that it has “limited” data available, and deprioritize it completely, with little hope of moving it forward in the listing process. If a State fish and game agency provides data that suggests listing is not warranted, that species could be classified as possessing “strong” data, such that the Service can make a “not-warranted” finding to appease that State. Rather than setting forth clear standards for what types of scientific data qualify – e.g. peer reviewed, quantitative, data collected within the last 5 years, etc. — the Service only suggests two amorphous classifications — “strong” versus “limited.”

Third, the proposed Bins and decision pathways are unclear and not mutually exclusive. For example, the discussion for Bin 3 states that this “bin is appropriate when the emerging science or study is already underway, or a report is expected soon, or the data exist, but they need to be compiled and analyzed.”⁸ The discussion of the lowest priority Bin 5 states that species would be suitable for this bin if there was a need to conduct “further analysis.”⁹ The Service does not define “soon.” It is very conceivable that different people will place similar species in vastly different Bins. We recommend that the Service provide additional detail to the public on how data availability will be assessed, and recommend that these two Bins be substantially revised as discussed in the next section.

II. The Draft Methodology Allows Political Concerns to Improperly Drive Listing Decisions.

At its most basic, the Draft Methodology could quickly become a shell game that leaves species in the same unprotected status that many candidate species faced for decades. Even if the Service had set out clear standards for which species would go in the five Bins, it then sets forth a set of exemptions and loopholes that make the prioritization scheme virtually meaningless. We are deeply troubled that the Service may, down the road in a future administration, revert to its illegal behaviors during the worst days of the Bush administration when Gail Norton and Julie MacDonald were running the agency.

First, the Draft Methodology does not make clear whether a species that is placed in Bin 1 can be de-prioritized based on other factors. We request clarification from the Service on this question. If a species is critically imperiled, will it remain in Bin 1 regardless of any other consideration? If a critically imperiled species can end up in Bin 4 or Bin 5, then litigation will be almost inevitable.

Beyond this question, we are very concerned that species could move from Bin 2 or Bin 3 into Bins 4 and 5 for vague, arbitrary and unscientific reasons. The Service has proposed the following list of additional factors that could result in a species moving down the priority list — again, potentially even out of Bin 1 — with little regard for current extinction risk:

- Degree of controversy
- Wide-ranging species
- Whether the protections of the ESA “would be able to improve conditions”
- Balancing workloads between regions
- The level of complexity of the status review

⁸ *Id.* at 2231.

⁹ *Id.*

Deciding to move a species out of Bin 1 due to “degree of controversy” is flatly illegal. Congress has made it unambiguously clear that listing determinations are to be made solely on the basis of the best available scientific and commercial data available.¹⁰ By the same logic, decisions about when to list a species must also be based solely on the basis of the best available scientific data available. The legislative history of the Act is replete with clear instructions to the Service to not allow politics or economics to impact listing decisions.¹¹ It is incredible that in 2016, the Service would still think that would be permissible to defer listing based on political controversy. This criteria must be eliminated in the Final Methodology. Peer reviewed science has shown that the Service has chronically shied away from listing politically controversial species, and citizen engagement has been the only recourse to protect those species.¹² Indications that the Service is prioritizing species based on degree of controversy will lead to litigation.

The remaining factors listed above are only slightly less objectionable. A wide-ranging species can be just as at risk of extinction compared to a narrowly restricted species based on the threats it faces. For example, under this factor, the Service could deprioritize a migratory bird species facing serious threats in its nesting grounds based on the fact that the bird is wide ranging. This of course ignores the importance of the safeguarding the nesting grounds and could lead to extinction. Deferring listing of a wide-ranging species will only lead to one thing: significant range contraction. When combined with the Service’s invalid *Significant Portion of Its Range* policy,¹³ a prioritization scheme that defers protection of wider-ranging species undermines the fundamental purpose of the ESA.

Deciding how to prioritize the listing of a species based on the purported “ability,” or lack thereof, of the ESA to improve conditions merely represents a cynical, self-fulfilling prophecy. The ESA remains the most effective conservation law ever passed to address the extinction crisis, with a 99% success rate at preventing extinction. The ESA is more effective at addressing pervasive, challenging threats than any other law available. Thus, to say that the ESA cannot address climate change, and then defer listing species because climate change is the primary threat, is simply defeatist and disheartening, and fundamentally undermines the very purpose of the law.

The level of “complexity” in a status review represents nothing more than another reason to not address politically sensitive species. Case law is clear that the Service is not obligated to conduct additional research beyond what is currently available when it makes a listing determination.¹⁴ The Service cannot constantly claim that it has over forty years of expertise in administering the ESA and then proffer an excuse that “complex” status reviews are just too difficult to complete in a timely manner. If the Service believes that this is a legitimate rationale for deferring a review, it should provide the public with clear examples such that stakeholders can assist the Service in completion of those reviews.

¹⁰ 16 U.S.C. § 1533(b)(1)(A).

¹¹ See, H.R. Conf. Rep. 97-835 (1982), 1982 U.S.C.C.A.N. 2860, 2860. (“The principal purpose of these amendments is to ensure that decisions in *every phase* of the process pertaining to the listing or delisting of species are based solely upon biological criteria and *to prevent non-biological considerations from affecting such decisions...*) (emphasis added).

¹² Brosi, B. J., and E. Biber, 2012. *Citizen Involvement in the U.S. Endangered Species Act*, SCIENCE 337:802-803.

¹³ *Final Policy on Interpretation of the Phrase “Significant Portion of Its Range” in the Endangered Species Act’s Definitions of “Endangered Species” and “Threatened Species,”* 79 Fed. Reg. 37,578 (July 1, 2014).

¹⁴ *Sw. Ctr. for Biological Diversity v. Babbitt*, 215 F. 3d 58 (D.C. Cir. 2000).

With respect to workloads in different regions, we recognize that Region 2 and Region 4 will have the majority of listing workload in coming years.¹⁵ We believe that the best way to address this workload is through multi-species and ecosystem based listing, in accordance with longstanding Service policy.¹⁶ We would like to offer our assistance to the Service in identifying where batched listings would offer additional efficiencies in the listing process and result in greater conservation benefits to more imperiled species. However, workload imbalances should not be used as an excuse to do nothing on species that are “controversial.” Instead, the Service should shift resources and staff to regions where there is a greater conservation need. The Service can easily look at the overdue findings and implement a staffing plan that addresses the workload issue without undermining the chances of preventing extinction for imperiled species.

Finally, Bin 2 must be revised significantly. Under the Service’s framework, a species with “strong” information indicating that listing is not warranted will be prioritized. From a conservation perspective, it does not make sense why the Service would allocate resources to make a not-warranted finding for a species when there remains other species that have overdue 12-month findings that have “strong” information that listing is clearly warranted. Prioritizing resources toward making decisions not to protect species undermines the Service’s purpose and responsibilities under the ESA. The Service may believe that such actions will help it accrue political favor with hostile State fish and game agencies, but that is a cynical, and improper rationale for delaying protections for imperiled species that truly need it as soon as possible.

We recommend that the Service instead include a Bin 6 for those species where “strong” information indicates that listing is not warranted. This will give assurance to States that those species are not likely to be listed, and allows the general public, scientists and other stakeholders to provide additional information to the Service if they disagree with that determination. As resources allow, we recommend that the Service complete batched not-warranted determinations for species in Bin 6 to gain additional efficiencies and cost savings.

III. Deferring Listing When State Conservation Efforts are Ongoing is Extremely Problematic.

The Endangered Species Act has always recognized the important role that States can play in the protection of both listed species and species that may warrant protection under the Act. It is clear that the possibility of listing under the ESA often galvanizes conservation efforts by State governments that would otherwise not occur. Nevertheless, deferring listing of an imperiled species to Bin 4 —especially where a species would belong in Bin 1 because it is critically endangered or Bin 2 because data are strong that listing is warranted immediately — based on vague promises and barely-initiated conservation actions, is not a valid rationale under the ESA. We recommend that the Service clarify the criteria by which it will determine that State efforts are adequate to justify deferring listing. We recommend that the Service use a streamlined PECE policy approach to assessing state efforts based on the likelihood that State conservation actions will be implemented and the likelihood that the conservation efforts will be effective.¹⁷ Where a State is willing to enact

¹⁵ See Appendix A.

¹⁶ *Interagency Policy for the Ecosystem Approach to the Endangered Species Act*, 59 Fed. Reg. 34274 (Jul. 1, 1994).

¹⁷ See, *Policy for Evaluation of Conservation Efforts When Making Listing Decisions*, 68 Fed. Reg. 15100 (Mar. 28, 2003).

permanent changes in management, acquire land in some type of permanent conservation status (easement or purchase), or dedicate consistent funding, then there may be justification for deferring a listing decision. Where a State's efforts are based only on voluntary unenforceable actions, temporary changes in management or do not provide funding or assurances that habitat will be conserved, deferring listing will not be justified. We recommend that the Service provide additional detail regarding the criteria by which species will be placed into Bin 4.

IV. The Service Should Provide for Online Feedback on Ranking of Species.

Because a species' conservation status can degrade quickly and unexpectedly (or improve based on conservation efforts), the listing workplan should not be a static document that remains fixed for the length of the workplan. Nor should the initial prioritization assessment and subsequent reviews be cumbersome and expensive. Thus, we recommend that the Service establish an online portal where members of the public, State agencies, and other stakeholders can submit information regarding species covered by the workplan. Establishing, or reopening, a docket on regulations.gov for each species covered by the plan and assigning a primary point-of-contact biologist for each species will allow for data to be submitted in an efficient and informal manner. To ensure that the workplan is available for some amount of formal feedback, we recommend that the Service open a period of public comment every three years on revisions to the workplan.

We recommends that the Service make available to the public a comprehensive list of the species that may be included in the workplan and placed into one of the priority listing bins, as well as a list of species that are *not* included in the workplan. Currently, information on the entire universe of overdue listing actions that the Service must take is being shared selectively with industry groups and State agencies to the disadvantage of the public and the environmental community. The Center for Biological Diversity is attaching the most current list, which it received as part of a FOIA request in Appendix A.

V. Conclusion.

The Service has a unique opportunity to move past the dysfunction and political manipulation of the listing process that has occurred periodically over the last 30 years, and set forth a rationale, science-based priority system that will ensure that the most imperiled species receive protection first. We have attempted to assist the Service in identifying those species most at risk of extinction, and offer our continued assistance in further identifying species for FY 2017 and beyond.

Sincerely,



Brett Hartl
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Center for Biological Diversity
Washington, D.C. 20008

APPENDIX A

All Overdue Required Findings Under Section 4 of the ESA.

Common name	Scientific name	States or Territories within the Historical Range	LPN	Lead USFWS Region	Package names	Required Action	90 Day Substantial	90 Day Not Substantial	12 Month Warranted	12 Month Not Warranted	Proposed (Prior to 1/2013 - PLPCH; Post 1/2013 PL Only)	PCH	Final L	Final CH	Notes:	Action in Progress
Kern Canyon Slender Salamander	<i>Batrachoseps simatus</i>	CA		R8	53 Reptiles and Amphibians	90D										
Kern Plateau Salamander	<i>Batrachoseps robustus</i>	CA		R8	53 Reptiles and Amphibians	90D										
Kings River Slender Salamander	<i>Batrachoseps regius</i>	CA		R8	53 Reptiles and Amphibians	90D										
Lesser Slender Salamander	<i>Batrachoseps minor</i>	CA		R8	53 Reptiles and Amphibians	90D										
Panamint Alligator Lizard	<i>Elgaria panamintina</i>	CA		R8	53 Reptiles and Amphibians	90D										
Relictual Slender Salamander	<i>Batrachoseps relictus</i>	CA		R8	53 Reptiles and Amphibians	90D										
Sandstone Night Lizard	<i>Xantusia gracilis</i>	CA		R8	53 Reptiles and Amphibians	90D										
Shasta Salamander	<i>Hydromantes shastae</i>	CA		R8	53 Reptiles and Amphibians	90D										
Southern Rubber Boa	<i>Charina umbratica</i>	CA		R8	53 Reptiles and Amphibians	90D										
Western Spadefoot	<i>Spea hammondi</i>	CA		R8	53 Reptiles and Amphibians	90D										
Hitch, Clear Lake	<i>Lavinia exilicauda chi</i>	CA		R8		90D										
Longitudinal-Gland pyrg (aka Longitudinal pyrg)	<i>Pyrgulopsis anguina</i>	NV, UT		R8	206 Mountain-Prairie Region species; 42 spr	12M	8/18/2009									F
Leona's Little Blue Butterfly	<i>Philotiella leona</i>			R8	Leona's Little Blue Butterfly	12M	8/17/2011									Y
Amargosa tryonia	<i>Tryonia variegata</i>	CA, NV		R8	42 springsnail species (ca, nv, ut); 10 Amarg	12M	9/13/2011									F
Ash Meadows Pebblesnail	<i>Pyrgulopsis erythropoma</i>	NV		R8	42 springsnail species (ca, nv, ut); 10 Amarg	12M	9/13/2011									F
Blue Point Pyrg	<i>Pyrgulopsis coloradensis</i>	NV		R8	42 springsnail species (ca, nv, ut); 14 Cave, V	12M	9/13/2011									F
Butterfield Pyrg	<i>Pyrgulopsis lata</i>	NV		R8	42 springsnail species (ca, nv, ut); 14 Cave, V	12M	9/13/2011									F
Corn Creek Pyrg	<i>Pyrgulopsis fausta</i>	NV		R8	42 springsnail species (ca, nv, ut); 14 Cave, V	12M	9/13/2011									F
Crystal Springsnail	<i>Pyrgulopsis crystallis</i>	NV		R8	42 springsnail species (ca, nv, ut); 10 Amarg	12M	9/13/2011									F
Distal-Gland Springsnail	<i>Pyrgulopsis nanus</i>	NV		R8	42 springsnail species (ca, nv, ut); 10 Amarg	12M	9/13/2011									F
Elongate-Gland Springsnail	<i>Pyrgulopsis isolatus</i>	NV		R8	42 springsnail species (ca, nv, ut); 10 Amarg	12M	9/13/2011									F
Fairbanks Springsnail	<i>Pyrgulopsis fairbanksensis</i>	NV		R8	42 springsnail species (ca, nv, ut); 10 Amarg	12M	9/13/2011									F
Flag pyrg	<i>Pyrgulopsis breviloba</i>	NV		R8	4 Great Basin springsnails; 42 springsnail spe	12M	9/13/2011									F
Flat-topped Steptoe Pyrg	<i>Pyrgulopsis planulata</i>	NV		R8	42 springsnail species (ca, nv, ut); 10 Ralston	12M	9/13/2011									F
Grated tryonia	<i>Tryonia clathrata</i>	NV		R8	42 springsnail species (ca, nv, ut); 14 Cave, V	12M	9/13/2011									F
Hardy Pyrg	<i>Pyrgulopsis marcida</i>	NV		R8	4 Great Basin springsnails; 42 springsnail spe	12M	9/13/2011									F
Hubbs Pyrg	<i>Pyrgulopsis hubbsi</i>	NV		R8	42 springsnail species (ca, nv, ut); 14 Cave, V	12M	9/13/2011									F
Lake Valley Pyrg	<i>Pyrgulopsis sublata</i>	NV		R8	4 Great Basin springsnails; 42 springsnail spe	12M	9/13/2011									F
Landyes pyrg	<i>Pyrgulopsis landyei</i>	NV		R8	42 springsnail species (ca, nv, ut); 10 Ralston	12M	9/13/2011									F
Median-Gland Nevada Springsnail	<i>Pyrgulopsis pisteri</i>	NV		R8	42 springsnail species (ca, nv, ut); 10 Amarg	12M	9/13/2011									F
Minute Tryonia	<i>Tryonia ericae</i>	NV		R8	42 springsnail species (ca, nv, ut); 10 Amarg	12M	9/13/2011									F
Moapa pebblesnail	<i>Pyrgulopsis avernalis</i>	NV		R8	42 springsnail species (ca, nv, ut); 14 Cave, V	12M	9/13/2011									F
Moapa Valley Pyrg	<i>Pyrgulopsis carinifera</i>	NV		R8	42 springsnail species (ca, nv, ut); 14 Cave, V	12M	9/13/2011									F
Neritiform Steptoe Ranch Pyrg	<i>Pyrgulopsis neritella</i>	NV		R8	42 springsnail species (ca, nv, ut); 10 Ralston	12M	9/13/2011									F
Northern Steptoe Pyrg	<i>Pyrgulopsis serrata</i>	NV		R8	42 springsnail species (ca, nv, ut); 10 Ralston	12M	9/13/2011									F
Pahranagat pebblesnail	<i>Pyrgulopsis merriami</i>	NV		R8	42 springsnail species (ca, nv, ut); 14 Cave, V	12M	9/13/2011									F
Point of Rocks tryonia	<i>Tryonia elata</i>	NV		R8	42 springsnail species (ca, nv, ut); 10 Amarg	12M	9/13/2011									F
Sourthern Steptoe pyrg	<i>Pyrgulopsis sulcata</i>	NV		R8	42 springsnail species (ca, nv, ut); 10 Ralston	12M	9/13/2011									F
Southeast Nevada Pyrg	<i>Pyrgulopsis turbatix</i>	NV		R8	42 springsnail species (ca, nv, ut); 14 Cave, V	12M	9/13/2011									F
Sportinggoods tryonia	<i>Tryonia angulata</i>	NV		R8	42 springsnail species (ca, nv, ut); 10 Amarg	12M	9/13/2011									F
Spring Mountains pyrg	<i>Pyrgulopsis deaconi</i>	NV		R8	42 springsnail species (ca, nv, ut); 14 Cave, V	12M	9/13/2011									F
Sterile Basin Pyrg	<i>Pyrgulopsis sterilis</i>	NV		R8	42 springsnail species (ca, nv, ut); 10 Ralston	12M	9/13/2011									F
Sub-Globose Steptoe Ranch Pyrg	<i>Pyrgulopsis orbiculata</i>	NV		R8	42 springsnail species (ca, nv, ut); 10 Ralston	12M	9/13/2011									F
White River Vally Pyrg	<i>Pyrgulopsis sathos</i>	NV		R8	42 springsnail species (ca, nv, ut); 14 Cave, V	12M	9/13/2011									F
Big Bar hesperian	<i>Vespericola pressleyi</i>	CA		R8	29 Pacific Northwest Mollusks (Formerly 32 s	12M	10/5/2011									F
Chelan mountainsnail	<i>Oreohelix n. sp. 1</i>			R8	29 Pacific Northwest Mollusks (Formerly 32 s	12M	10/5/2011									F
Columbia Oregonian	<i>Cryptomastix hendersoni</i>	OR, WA		R8	29 Pacific Northwest Mollusks (Formerly 32 s	12M	10/5/2011									F
Dalles Sideband	<i>Monadenia fidelis minor</i>	OR		R8	29 Pacific Northwest Mollusks (Formerly 32 s	12M	10/5/2011									F
Evening Fieldslug	<i>Deroceras hesperium</i>	OR, WA		R8	29 Pacific Northwest Mollusks (Formerly 32 s	12M	10/5/2011									F
Hoko vertigo	<i>Vertigo n. sp. 1</i>	WA		R8	29 Pacific Northwest Mollusks (Formerly 32 s	12M	10/5/2011									F
Keeled jumping-slug (aka Burrington Jumping-slug)	<i>Hemphillia burringtoni</i>	WA		R8	29 Pacific Northwest Mollusks (Formerly 32 s	12M	10/5/2011									F
Puget oregonian	<i>Cryptomastix devia</i>	OR, WA		R8	29 Pacific Northwest Mollusks (Formerly 32 s	12M	10/5/2011									F
Shasta chaparral	<i>Trilobopsis roperi</i>	CA		R8	29 Pacific Northwest Mollusks (Formerly 32 s	12M	10/5/2011									F
Shasta hesperian	<i>Vespericola shasta</i>	CA		R8	29 Pacific Northwest Mollusks (Formerly 32 s	12M	10/5/2011									F
Shasta Sideband	<i>Monadenia troglodytes troglodytes</i>	CA		R8	29 Pacific Northwest Mollusks (Formerly 32 s	12M	10/5/2011									F
Wintu Sideband	<i>Monadenia troglodytes wintu</i>	CA		R8	29 Pacific Northwest Mollusks (Formerly 32 s	12M	10/5/2011									F
San Bernardino flying squirrel	<i>Glaucomys sabrinus californicus</i>	CA		R8	San Bernardino flying squirrel	12M	2/1/2012									Y
Eagle Lake rainbow trout	<i>Oncorhynchus mykiss aquilarum</i>	CA		R8	Eagle Lake Trout	12M	9/5/2012									Y
Woodpecker, Black-backed	<i>Picoides articus</i>			R8	Black-backed woodpecker	12M	4/9/2013									
Canary Dusksnail	<i>Colliguryx convexus (aka Lyagyryx spc)</i>	CA		R8	29 Pacific Northwest Mollusks (Formerly 32 s	PLPCH	10/5/2011			9/18/2012						Y
Goose Valley Pebblesnail	<i>Fluminicola anserinus</i>	CA		R8	29 Pacific Northwest Mollusks (Formerly 32 s	PLPCH	10/5/2011			9/18/2012						Y
Hat Creek Pebblesnail	<i>Fluminicola umbilicatus</i>	CA		R8	29 Pacific Northwest Mollusks (Formerly 32 s	PLPCH	10/5/2011			9/18/2012						Y
Nugget pebblesnail	<i>Fluminicola seminalis</i>	CA		R8	29 Pacific Northwest Mollusks (Formerly 32 s	PLPCH	10/5/2011			9/18/2012						Y
Potem pebblesnail	<i>Fluminicola potemicus</i>	CA		R8	29 Pacific Northwest Mollusks (Formerly 32 s	PLPCH	10/5/2011			9/18/2012						Y
Shasta Springs pebblesnail	<i>Fluminicola multifarius</i>	CA		R8	29 Pacific Northwest Mollusks (Formerly 32 s	PLPCH	10/5/2011			9/18/2012						Y
Longfin Smelt (San Francisco Bay Delta population)	<i>Spirinchus thaleichthys</i>	CA	3	R8	Longfin Smelt	PLPCH				4/2/2012						
Hermes Copper Butterfly	<i>Lycaena hermes</i>	CA, MX	5	R8	Hermes Copper Butterfly	PLPCH				4/16/2011						