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Date: JUL 11 2018

Subject: Objection Response for the Flathead National Forest Land Management Plan Revision's Species of Conservation Concern

To: Regional Foresters, Northern Region

This is my response to the objections regarding the identification of Species of Conservation Concern (SCC) related to the final Environmental Impact Statement (EIS), draft Record of Decision (ROD), and the revised Land Management Plan (revised Plan) for the Flathead National Forest filed by Friends of the Wild Swan, Defenders of Wildlife, Alliance for the Wild Rockies and Wild Earth Guardians.

In addition to the four objections submitted and accepted, there were six requests from interested persons. Each objector and interested person will receive notification of my response. The final objection response is available on the Web site at <http://www.fs.fed.us/objections> and listed under Region 1 – Northern Region, or hard-copy, upon request.

Background

The Flathead National Forest *1986 Forest Land and Resource Management Plan* (Forest Plan) is being revised under the 2012 planning rule requirements. The Flathead National Forest staff provided documentation, rationale and public outreach for a potential SCC list provided as part of the *2014 Assessment of the Flathead National Forest*.

The Regional Forester sent a memorandum with a list of SCC for the Flathead National Forest's draft revised Plan and draft EIS to the Flathead National Forest Supervisor on May 25, 2016. The list was developed by biologists, botanists, and other resource specialists from the Regional Office and Flathead National Forest using best available scientific information, including expertise offered by regulatory agencies and tribal, research, and conservation communities. In the memorandum, the Regional Forester noted the identification of SCC is a dynamic process. New scientific information and public input may prompt changes in the SCC list for the final EIS and final revised Plan. The public had a chance to comment on the SCC list during the 90-day comment period for the Draft EIS.

On November 28, 2017, a memo was sent from the Regional Forester to the Flathead National Forest Supervisor with the final SCC list for the Flathead National Forest's final revised Forest Plan. The updated list removed fisher, harlequin duck, Townsend's big-eared bat, and west slope cutthroat as SCC. A plant species, Hudson's Bay bulrush, was added.



The responsible official for the SCC list is Leanne Martin, Regional Forester, Northern Region. The Reviewing Officer for the SCC objection is the Interim Chief of the Forest Service. Associate Deputy Chief Christopher B. French has been delegated authority and is representing Interim Chief Victoria Christiansen.

Review and Consideration of Objection Issues

I convened a review team to look at the objection issues and the project record related to identification of SCC. On April 12, 2018, I took part in the Flathead National Forest revised Plan objection resolution meeting being held in Kalispell, Montana. The information and conversations that occurred during the discussion of SCC objection issues was also used to inform my decision. I have enclosed the review team's detailed review of the objection issues. The following is a summary of the four objection issues:

Issue 1: Friends of the Wild Swan and Alliance for the Wild Rockies contend Sensitive Species should have been identified as species of conservation concern or a scientifically defensible analysis provided as to where there is no concern about a downward trend in number, density or habitat capability.

- The review team examined the documentation and found it was sufficient in accordance with regulation and policy for identification of SCC. Each plant or animals species that was a Regional Forester's Sensitive Species (RFSS) was evaluated for inclusion as SCC. Those not identified as SCC were determined not to fit the definition for SCC. The documentation is contained within the record analyzing terrestrial animals, aquatic animals and botanical species for identification as SCC. The documentation walks through the criteria that defines what should be identified as SCC.

Issue 2: Defenders of Wildlife contend threats from outside the plan areas should have been part of the consideration of SCC. If there is insufficient information on a species persistence in the plan-area, the analysis area should be broadened to include a larger area if there is sufficient information outside the plan area.

- The review team concluded the Northern Region appropriately excluded harlequin duck, northern bog lemming, boreal (western) toad, Sandhill crane and gray-crowned rosy-finch from the SCC list. The information presented in the record show the species are secure in the plan area.
- The process the Northern Region used to identify SCC took into account species at-risk at a broader scale and their status within the plan. This is evident through their citation of the best available science contained within the Montana Natural Heritage Program (MNHP) data.

- It is important the SCC rationale include consideration of whether broad-scale threats (through NatureServe, MNHP data or other sources) are relevant to, and cause substantial concern about, the species' capability to persist over the long term in the plan area. The review team believes the documentation could be stronger for the specific species listed by the objector.
- The review team found the documentation supports the decision not to identify hooked snowfly, subartic darter, boreal whiteface, a mayfly, glacier amphipod, and brushed tipped emerald as SCC, but found the connections between the NatureServe/MNHP rankings, documentation of the species threats, and the rationale for SCC determination was unclear in the Aquatic Spreadsheet.

Issue 3: Several species known to occur in the plan area were excluded.

- The review team found that the documentation supports the decision not to identify bighorn sheep, Gillette's checkerspot, Suckley cuckoo bumble bee, fisher, and western pearlshell mussel as SCC.
- The review team found information was needed in the record to clarify the nature of bighorn sheep transient use on the Flathead National Forest.

Issue 4: The Regional Forester should identify wolverine as a species of conservation concern

- The review team found it was appropriate not to identify wolverine as SCC.
- The wolverine is currently a proposed species for listing under the Endangered Species Act. The 2012 planning rule at 3 CFR 219.9© states, "A species of conservation concern is a species, other than federally recognized threatened, endangered, proposed, or candidate species..."

Reviewing Officer Instructions to Regional Forester

As a result of the Objection review I am instructing you to do the following:

- 1) Please review and amend the documentation for harlequin duck, northern bog lemming, boreal toad, Sandhill crane, and gray-crowned rosy-finch to verify the broad-scale threats do not cause substantial concern about these species capability to persist over the long term in the plan area, as necessary.
- 2) The Region should review the documentation of threats for mantleslug, hooked snowfly, subartic darter, boreal whiteface, a mayfly, glacier amphipod, and brushed tipped emerald to ensure the record clarifies why a NatureServe ranking or listing as Montana Sensitive Species does not result in the identification of these species as SCC.

- 3) Documentation for bighorn sheep should include more detailed information about the sightings of bighorn sheep on the Flathead National Forest. Bighorn sheep habitat maps should be added to the record to further clarify known bighorn sheep range.

As you address the above listed instructions, you may need to reconsider the identification of a species as SCC. If that occurs, please follow the process described in FSH 1909.12, Chapter 20, section 21.22b, as expeditiously as possible, following the signing of the Record of Decision for the Flathead Land Management Plan.

By copy of this letter and notification of availability on the internet, I am notifying all Objectors and Interested Persons of my decision. This response represents the final decision of the U. S. Department of Agriculture on this objection (36 CFR 219.57(b)(3)).



CHRISTOPHER B. FRENCH
Reviewing Officer for the Chief