Species of Conservation Concern:

Lessons Learned Workshop Notes

July 31, 2017
R8 Office, Atlanta, GA

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1.0 Workshop Purpose, Objectives and Goals

On July 31, 2017 approximately 40 agency employees, across regions and the Washington Office, gathered to discuss how the USFS analyzes, documents and identifies Species of Conservation Concern (SCC), with the goal of improving our overall effectiveness and consistency with providing for at-risk species conservation.

Currently, objections to the SCC identification process occur at the end of plan revision, which has the potential to delay the approval of revised plans because of inconsistencies with the analysis and identification may not be publicly identified until near the end of the planning process. The Ecosystem Management Coordination (EMC), Range & Vegetation Ecology (RGVE), and Water, Fish, Wildlife, Air, & Rare Plants (WFWARP) staff groups have worked together to develop a "suggested" practices and "key considerations" document that we hope will be valuable to the Regions/Forests/Grasslands to spur internal dialogue and help address these inconsistencies.

Each Region was asked to provide a regional planner and a technical natural resource specialist (preferably, with experience evaluating SCCs) to participate in the workshop—sharing lessons learned throughout their SCC process.

Welcoming remarks were offered by Chris French (Director, EMC) and Rob Harper (Director, WFWARP). A summary of these remarks include:

Objectives- Chris French

- Today's objectives include sharing our thinking, practice and learning around SCCs
- We have a diverse group of people in the room—different experiences, opinions, and lenses of interpretation. There's a whole lot we agree on and still some items we may disagree on.
- The point of this learning event is to collaboratively approach SCCs and see where we can improve agreement.
- The WO team managing the "key considerations" effort started with a x-agency inquiry to identify key issues or challenges that have emerged in process over time. These issues were consolidated into a summary of things to consider and emerging best practices.
    - Today is a continuation of this inquiry and summary.
- We encourage open dialogue and ask participants to share what they know, take in something new, question, and help us determine where we are as an agency on SCCs.
- **Objective for the day—share what you know and take in something new**.

Goals- Rob Harper

- We are striving for an **integrated approach** across three staff areas in our policy and learning on how we implement SCCs.
- Discussions on SCCs and implementation of the 2012 Planning Rule has exposed some real divisions in the agency.
- On-going and natural tension between wanting clear direction from the WO and allowing enough flexibility for regions to work through site-specific, regional contexts. WE recognize this tension and recognize the need to better work through this. We (the WO) want to provide the field with the right level of assistance.
- With regards to the key considerations paper, at the end of the day what we're left with is the rationale and the administrative record for why we selected a species or didn't move a species forward. The key considerations document, as written, was intended to support developing that rationale.

2.0 Lessons Learned from Francis Marion Objection

The Francis Marion NF was the first national forest to go through the SCC objections process. This session provided the Forest and Region to share their lessons learned, including critical interactions and involvement of partners. A summary of this panel follows.

2.1 Regional Perspective

- Timeline: Forest had NOI in 2014; SCC list development in June 2015; Public comment period in Nov 2016; Objection End in Nov 2016.
- Received one objection letter from Defenders of Wildlife.
    - 77 issues raised (SCC, red-cockaded woodpecker, PC specificity, timber management and NFMA).
    - SCC objection issues included: List criteria, Exclusion based on substantial concern, occurrence, interpretation of occurrence, BASI requirements, delegation of authority, how address public comment, plan area versus broader context
- Resolution Meeting with the Objector held on Dec 1 2017—discussed non-SCC issues. Second meeting on December 2 2017 on SCC issues.
- Released the updated plan in Jan 2017; issued ROD in Mar 2017
- Updated planning documents, based on objection resolution, including:
    - Known to occur – can consider species threatened only by climate change
    - Substantial concern - Added that concerns such as climate change, genetic swamping can be valid threats
    - Plan components cannot mitigate conservation concerns or preclude SCC selection. SCC identification happens prior to developing plan components.
    - Added an explanatory note that G and S ranks are used to identify species to consider, not to exclude from the list. S3 species - will take a look at those, not just immediately dismissed.
    - Clarified a 2-step process: (1) what species to consider; (2) look at their persistence
    - Added additional info to document species, included documentation on species that did NOT make the list, in addition to those that make the list.
    - Clarified that the Forest provides recommendation to regional office, but the regional office makes the determination.

2.2 Forest Perspective

- Heard from the Objector (Defenders of Wildlife) that they need stronger supporting information for conclusions. Clarified this in ROD and appendix—on determinations and rationale
- Clarified and updated crosswalk into a single table with methods and reasoning for all 76 species--that clearly links species with ecological conditions and plan components for all 76 species.
- Made edits to ensure consistencies throughout document
- Clarified desired conditions and standards and guidelines for SCCs
- For additional 25 SCCs, the BASI, persistence, and known to occur being updated. Of 25 species, 8 are known to occur, 3 with past element occurrence, recommending bringing 4 of the species onto the SCC list.

2.3 Objector Perspective

- Francis Marion objection resolution was a productive process, from a stakeholder view-point. Defenders was pleased with the outcome of the process.

    - It's not adversarial. I view objection as collegial. It is healthy for multiple parties evaluating the SCC process in a rigorous fashion.
- Defenders has been tracking implementation of the Planning Rule since it began. The SCC issue has been their dominant issue. So no surprise there was an objection on the Francis Marion.
    - This issue is a challenge because people are still in a interpreting the rule and directives, and it's still early in terms of interpretation. It's not surprising to see an evolution of thinking on policy.
    - Many of the things we'll be discussing today are areas of ambiguity in the rule. Defenders and other groups aim to play a complementary role.
- Objection on Francis Marion stemmed from inability to understand the rationale for how decisions were made on excluding some species from the SCC list. No doubt that the forest had that information and thought deeply, but it wasn't in the record and we couldn't see into Paul's brain.
    - Looking for a clear logic model on the criteria for selection supported by BASI. Need to track how information was applied to make rational decision-making. As group outside the agency, we need to see the clear rationale in the planning documents.
- Many of the key considerations get at this –the "show your work" part. This can be a tremendous burden in a complex planning process, but professionals have that information and knowledge, and the public does not. They need this information. It's a collaborative process.
- We need more structured decision-making. Define objective at outset. Discuss criteria and mechanisms for making the decisions. This needs to be defined and out front in the process for all to understand.
- At the end of the decision making process, there may be conflict over the decision, but there shouldn't be conflict over how the decision was made.
- This meeting illustrates we're still working though this criteria. This is something the agency needs to do

2.4 Participant Discussion and Questions

- ***How was "becoming established" addressed by the Francis Marion?***
    - If a species is moving into an area because of climate change, then we determined that was a species to look at for SCCs. Becoming established is nebulous and difficult to quantify.
    - One example is Indiana Bat, need to identify significant changes in range.
    - The assessment would be the appropriate place to look at models for becoming established.
    - Point is to evaluate and come up with a rationale.
    - Additional regional input:
        - It would be difficult to identify species based solely on our thinking that they're becoming established. In R1, wouldn't have been able to identify that from the start as becoming established.
- ***How did the overall process work for the forest?***
    - Paul (R8): In identifying SCCs, we had various workshops. Defenders was definitely involved from the draft on.
    - Pete (Defenders): Everyone should work on getting to the table earlier. Shouldn't be a tremendous surprise.
    - Mary (Forest): The Forest hosted a 3 day public meeting on SCCs, DOW may have been focusing on areas ahead of forest, and they (forest) slipped up on them. The directive weren't out yet. Initially, the forest cast a really big net with SCCs and had to narrow it. In many ways, the forest was "below the radar" because the Francis Marion is a small Forest that is typically not very controversial. We tried to do upfront public involvement.
    - Robin (Forest): Verbal communication is so important.

    - Chris French (WO-EMC): Beyond the SCCs, anytime we cast a wide net, there is a demand to show clear rationale on why we are excluding things. Lesson learned: we tend to focus on why we are including something, but there is equal demand for why we are excluding things.
- ***Is there a plan for the Francis Marion if one of the 25 being reconsidered needs new plan components, how to put those in place?***
    - Pete (Defenders): First need to make a determination on the 25, then we can look at sufficiency of plan direction. I think that there is sufficiency, but there needs to be analysis on that screen.
- ***How do you feel the cross-walk worked? Would you recommend doing something similar on other forests?***
    - Robin (forest): The cross-walk we included in the final was the structure DOW suggested. They wanted to know what we were doing for each species. It was helpful. Our suggestion would be to minimize the number of places where you repeat information.
    - Pete (Defenders): We've been making this recommendation on doing a cross-walk nationally. We find it easier to review and understand if the information is in a one stop location, rather than riddled throughout a plan or its associated documentation. In addition to getting biologists ready, get your excel spreadsheet experts ready. It sounds simple, but it is some significant information management challenges putting it all in one place.
    - Paul (R8): The cross-walk table will also help with plan implementation at the project level, determining project-plan level consistency.
- ***What are the four species you are proposing to bring forward?***
    - No wildlife, they're not known to occur or difficult to detect. All four were Plants
- ***Did you go out and do more surveys to see if there was occurrence?***
    - Yes

3.0 Regional Lessons Learned

During the workshop, each region was asked to share their lessons learned throughout their SCC process and provide reflections on how these lessons relate to recommendations in the "key considerations" document, including: utilized or planned public engagement strategy, how the Region is addressing "known to occur," "capability to persist over the long term," and "substantial concern" in the plan area. In these presentations, they also identified items they believe warranted further discussion in the afternoon.

Note: copies of the flip charts used in the regional sharing are presented in the Appendix.

3.1 Region 1—Northern Region

- Four forests in Region 1 are currently in revision (3 have SCC list; 1 PSCC list). One was finished before directives, so may be making changes.
- Public engagement lessons learned:
    - Forests began working on its SCC list during assessment
    - Custer Gallatin had a 30-day comment period on assessment
    - Flathead put its SCC list out with draft EIS. Received 34,000 comments on draft EIS. It was a challenge to tease out SCC list comments specifically in this larger collection.
- Known to occur:

    - Region determined that it must have documented evidence of occurrence within the plan area. No speculation of habitat potential, no thinking about adjacent lands
    - Used state heritage and other lists extensively, along with other information
    - Used NatureServe timeframes for considering species, distinguishing between historic and current range within 20-40 years.
- Capability to persist over long term:
    - Interpreted as the capability to provide ecological conditions.
    - Found it was really important that documentation be consistent with what's in other parts of the planning record. Need to close the loop and look back where we've changed our mind.
    - The WO provided a review and having that extra eye was helpful.
    - Defining long term was big challenge. If looking at long-term disturbance events, could be looking a couple hundred years out. This needs further discussion and exploration.
- What constitutes sufficient information?
    - Looked at adequacy of survey data to determine if a given species occurs. Sometimes surveys aren't at the right window of time, some species are very difficult to detect.
- Balance consistency and approach
    - Identify as an agency what the deal-breakers are - where do we need to be consistent, where don't we? WO would need to be part of the messaging, and back the forests.
- Topics for future discussion:
    - Unclear on when there will be manual direction for SCCs and until that time, what process for evaluation will the forest be expected to follow?
    - What differences in documentation are happening amongst regions? Do we need to be consistent?
- Participant Comments and Questions:
    - WO needs to have agreement amongst its directors and speak loudly with that voice. Right now feels like the field is hearing more than one, conflicting voice.
    - The WO-review of the Flathead was very helpful and set a clear bar.
    - Unfortunately, the key considerations paper added nebulous future bar for SCCs.
        - Key Considerations said to include all G3/S3 species, but we're hearing that we need to be thoughtful. It looks like it's involved, but now it says don't need to include documentation.
        - Use of NatureServe definition vs. looking at why there is still habitat present (which may not affect why the species is no longer there)
    - We're spending a lot of time and effort on the documentation of exclusion or inclusion of species. Wondering how much that actually improves the quality of the plan? This seems to be upping the bar without improving the plan.

3.2 Region 2- Rocky Mountain Region

- Public Engagement Lessons Learned:
    - Include state agencies early.
    - Include all the appropriate staff levels, unit and region.
    - Include the appropriate staff in development of the public engagement process. Public affairs officers don't always know everyone the other staff do.
    - Include PAO early on
    - Tailor public engagement to your specific audience
    - Be inclusive when responding to various groups
    - Engage early and often

- Known to occur:
    - Started with local regional forester sensitive species list. This was a big list.
    - Assess the unit's capacity to move forward with existing staff and data
    - Recognize that there is lots of room for interpretation in rule
        - Plants are there if they have roots in ground
    - Issues of supplemental guidance,
        - qualifiers for how many occurrences are needed
        - Current vs historic range
    - Monitoring challenges
        - Nocturnal species
        - Invertebrates
- Capability to persist:
    - Also room for interpretation here.
    - Conservation rankings need to include local information
    - On the Rio Grande, there was significantly changed habitat condition from beetle kill. This presents a lot of uncertainty.
    - Climate change vulnerability assessments provided data
    - Importance of addressing key ecosystem characteristics,
- Topics for future discussion
    - Need further clarification on criteria for known to occur that provides consistency but allows flexibility
    - Stressing the Importance of plan components vs. size of list
    - BASI used appropriately, reviewed (local SCC review group)
    - Plan component development
        - Tie between species habitat conditions and plan components
    - How to tie between SCCs with monitoring
    - How does one ensure strong coordination across boundaries (other forests and regions)
    - External coordination - ensuring that SCC process involves science and stakeholders. Have time available to evaluate input from public.
        - External reviews by science based partners.
    - How do we build better interdisciplinary involvement into process
    - Communicating expectations from line officers to team members early, frequently and clearly
- Participant Comments and Questions
    - In the SE, USFS partnered with FWS refuge friends group on SCC work. They organized a whole series of at-risk workshops to bring experts together to gather data. They didn't make recommendations, just gathered data.
        - These "at risk species workshops" are meant to get ahead of list.
    - Make tie to monitoring plan for assessing viability.
        - It's really about the plan components, and monitoring to meet desired conditions. Don't want to do viability assessments at project level, not meaningful.
    - Trying to get cooperators to focus on plan components and see if they're ensuring viability for all species. Also may not need plan components specifically for an SCC. Coarse filter might adequately address SCCs already. This is hard for people to understand.
    - May have spent so much time talking about the size of the list, they forgot to do plan components first time. This (SCC process) is a tool, the Region got stuck on the size, not the execution.
        - There's an inherent bias by starting with the RFSS. It we start with a clean slate, would that be a more effective approach.

        - Others felt the RFSS list, because it was based on NatureServe, was a good starting point.
        - We get too focused on what is a starting list. We need to expand beyond that. Nature serve is just a starting point.

3.3 Region 3-Southwest Region

- Six forests are in revisions, five under the 2012 Planning Rule; 4 have gone through concurrence process with regional forester.
- Public Engagement Lessons Learned:
    - The NatureServe list is just a starting point. Forests develop a list and then go out and engage with the public, Tribes, other government agencies, etc., to see what's missing on the list to take through the screening process. This gets whittled down through the screening process (biggest one is known to occur)
    - The region has not, so far, had public meetings specific to SCC process. The SCC process does gets brought up at every public meeting, however. It's a part of the plan revision process and not set on a pedestal.
    - Forests have worked hard to be exhaustive both on the number of species and the information about them.
    - Have not had any complaints about 1-on-1 process.
        - Feedback has been both on including and removing species.
    - Once they have approved list, they intend to post it to the website.
- Known to occur:
    - Interpreted as documented presence on the planning unit at some time. The forest decides whether to use historic data or not and it varies based on taxa.
    - Make sure that the Forest does a good job at explaining the rationale. The region doesn't get involved in questioning the technical expertise of specialists.
    - No fixed time limit.
- Capability to persist over long term:
    - Habitat Evaluation
        - Departure condition models - fire regime, structural, vegetation composition. Use to calculate system risk.
        - Status of essential habitat - coarse filters but fine scale element (e.g. Beaver Dam for Frogs)
        - Extent of activities that contribute to departure/trend within suitable habitat
        - Extent of magnitude of activities that contribute to disturbance or disruption of behavior or essential habitat
    - Use population and distribution information where known (but generally don't have this at the appropriate scale (planning unit scale)
- Topics For Future Discussion:
    - How do we involve people at the forest level in figuring out the solutions, they're feeling left out?
    - Would be good to design an annual planning lessons learned meeting, with people from different levels (team leads, forest level folks)
- Participant Comments and Questions
    - How does a dynamic such as disease show up in plan components?
        - Agency has limited capability to influence, need to document that. We can't control plague.
    - Were climate change vulnerability assessments ecosystem or species approach?

        - Systems approach. Use it as a coarse filter.
        - Also have a socioeconomic climate change vulnerability assessment
    - How do you resolve disagreements, since you aren't doing public meeting, you're mainly doing one-on-one?
        - Most of this comes up in private meetings. Most general public doesn't bring this up in public meeting settings.
        - Carson did a response to comments on SCC list.

3.4 Region 4- Intermountain Region

- Public Engagement Lessons Learned:
    - Contact key agencies or groups directly and early if you know or expect they will be able to provide information relevant to the SCC selection (e.g., State Fish and Game Agencies, FWS, plant societies, etc.).
        - Engage with USFWS early!
    - It takes more than one time to explain what SCC are and how they are identified, and then expect to explain it again.
    - Keep things as clear and concise as possible when explaining SCC and the SCC criteria to the public.
        - A simplified visual example (i.e. flowchart) of the criteria and/or the process is helpful.
    - Develop a clear SCC purpose statement that describes how SCC will conserve species and help resource users.
- Known to Occur:
    - 20 yrs was used as starting point for occurrence criteria cutoff (this was borrowed from other regions)
    - Taxonomic uncertainty was a big deal for plants
    - For plants, you can have accidental occurrence? (trickle downstream)
    - Species not known to occur:
        - Those that occur in the vicinity of the Forest or have known suitable habitat on the Forest but for which there is no occurrence record. (Can add if new information indicates otherwise.)
        - Those with only historical records, and for which the best available science leads to a conclusion that the species is no longer present; no definite standard for when a record or EO becomes historical. (As records become more historical, they are less likely to be 'known to occur').
        - Species occurrence deemed accidental, transient, or well outside of the species range.
        - Species not currently on the forest, but which the states or others are actively pursuing restoration back into historic range and habitats as part of a cooperative conservation strategy or plan. (Can always have plan components for other species, especially to coordinate planning with others.)
- Substantial concern:
    - Some combination of threats either directly to the species or indirectly to its characteristic habitat: declines in the sizes and/or numbers of its populations and/or declines in its habitat.
    - Must be supported by the best available scientific information, documented in standardized species assessment form.
    - G1 and G2 rankings are considered sufficient information to indicate substantial concern if threats are present.

    - Threats to species are considered regardless of source. FS management does not have to be the source of threats.
    - Climate change, non-native species, and genetic swamping are valid threats for certain species.
- Capability to persist:
    - Ecological time, i.e. associated with ecological processes, ranging from dispersal and competition on the shorter end, to forest succession on the longer end; longer than the forest planning cycle, but bounded by processes that can be addressed through ecological analyses.
    - Forests are asked to consider BASI for population size and trend, demographics, and habitat condition on the unit in making conclusions.
    - G1 and G2 rankings are considered sufficient information to indicate substantial persistence concerns when threats are present.
    - If data is unavailable to confirm a species persistence status in the plan area, consider other evidence, possibly in combination, from the Forest and other sources.
- Topics for future discussion:
    - Seems to be a great deal of answer shopping issue with WO
    - Develop and provide clear visual aids that simplify complicated content make things easier for the public as well as specialists.
        - Develop an Info sheet to explain SCC role in managing for diversity, maybe back to back with explanation of what happened to MIS
        - Handout with flowchart of process
    - Value of an informal comment opportunity on process on Regional web where RF identified SCC will be provided for ongoing feedback (not the same as formal comment period of Forest's revision process).
        - All specialists involved need to have a clear understanding of what SCC are and the criteria for their selection.
    - Ensure that Forest level specialist understand that the Regional Forester identifies SCC and that decision may not match the Forest's recommendation.
        - Leadership should not be alarmed to see a number of species on the list
    - The RO needs to provide clear SCC guidance and expectations to the Forest. The RO should ensure consistent rational and conclusions are applied to all species considered for SCC and respect Forest input and analysis.
    - Expect SCC plants lists to be larger than SCC Animal Lists. There are more plants than animals including narrow endemics.

3.5 Region 5- Pacific Southwest Region

- Did an assessment for early adopters (across the Sierra Nevadas). Had 5000 species on list from first cut, didn't know if they occurred on national forests. Asked for public input.
- Regional office has played a large role in planning to keep consistency. Top loading the process then having field biologists weigh in - gives consistent approach
- Public Participation Lessons Learned:
    - Be clear on criteria and process
    - Demonstrate BASI
    - Public engagement early and often
    - Supported by rationale
    - Give clear examples
- Known to occur

- Have to have a location in the planning unit (X,Y coordinates)
    - No single siting
    - Biologically makes sense.
    - Species uses plan area for some life needs
- Historical records are considered at taxonomic level
- Tools – Databases used include: Heritage, NRIS database, BISOn USDA public database for 1-stop-shopping
- Challenges
    - Working on multiple units at the same time (knows on one forest and unknown on another—how document this uncertainty?)
    - Perceived common species (eg. Porcupine is considered a common species)
    - Unknowns

- Substantial Concern for Persistence
    - Start process early to engage the public.
    - Problem on the ground that people didn't read/understand rule and directives—many thought that if there is no management risk currently that they didn't have substantial concern
    - Personal vs professional – need a consistent process across the board
- Variation
    - If rely solely on NatureServe, you're missing a lot in some counties. The State Wildlife Action Plan recently got an update, so had to consider new. Heritage went to quarterly updates. How does one maintain up-to-date rankings? This changes things in the process?
    - Expectations that G123, S123, SWAP, etc. will be on the list. How best communicate this to the public?
    - Really concerned about care and feeding of list
- Topics for future discussion:
    - In documentation, getting more prescriptive, so need more specifics. Need more taxa specifics if going prescriptive. Maybe just need to be less prescriptive?
    - Process is dynamic, so how to manage workload? New information, new taxonomic certainty, etc. For R5, we have huge number of species!!

3.6 Region 6- Pacific Northwest Region

- Public engagement lessons learned:
    - Share the sources we will use to determine whether the must or should consider categories are met.
    - Then we will share the list with that sources/information applied to develop a draft potential SCC list.
- Known to Occur:
    - Utilized the following sources to determine the occurrence status of a species in plan areas within Washington and Oregon (including but not limited to):
        - Field Guides for Washington and Oregon or similar books
        - Interagency Special Status and Sensitive Species Program (ISSSSP) species fact sheets, conservation assessments, and conservation strategies
        - Natural Resource Manager (NRM) TESP, NRM Wildlife, NRM Aquatic Surveys
        - Regional and Forest GIS datasets (e.g. Redband trout distribution layer)
        - Agency local knowledge of species on the plan area

        - NatureServe BIOTICS database and the OR and WA state heritage databases (Oregon Biodiversity Information Center (ORBIC) and Washington Natural Heritage Program (WNHP))
        - Partners in Flight (PIF) Avian Conservation Assessment databases and FWS Bird Conservation Region lists (BCR)
        - And many more…..
    - Region 6 has not yet confirmed buffer distance around a plan area or the timeframe a species was last documented on a plan area. We are waiting on the national guidance.
- Capability to persist:
    - The process differs depending on the taxa group.
        - A fish viability analysis process is currently being finalized along with the Aquatic and Riparian Conservation Strategy.
        - A work group focusing on developing invertebrate viability process is currently underway.
        - We plan to group species, knowing we can't conduct viability analyses for all the potential invertebrate SCC. And, we know we need to develop a flora viability process, but that will come after the invertebrate process and procedures are drafted.
    - Vertebrate terrestrial wildlife have published, peer-reviewed viability processes that will be used. In general after the SCC's have been identified based on the categories identified in the planning directives for must consider and should consider species
    - All viability processes and procedures would be scientifically peer-reviewed with the intention of publication in a scientific venue (e.g. GTR, journal article).

- Topics for future discussion:
    - Consideration of regional comments on the SCC Key Considerations document
    - Determine how other regions are documenting their processes
    - Lessons learned events and methods

3.7 Region 8- Southern Region

- Public Engagement Lessons Learned:
    - Key agency biologists involved in outreach
    - Conduct a targeted personal outreach to key individuals
    - Work with species group experts
    - Post info on-line for easy access
    - Start early and have initial list out when you release draft assessment
- Known to occur:
    - Reviewed in field by USFS personnel or partners
    - Used digital GIS data on element occurrences from state heritage programs
    - Used a combination of sources
    - Used a tracking spreadsheet
    - Species life history requirements should be used for determining the current presence instead of any arbitrary timeframe
        - However, will need some other consideration/reference points for obscure species
- Capability to persist:

    - Considered: known threats, habitat availability, population number and status, population and habitat trends,
    - Difficulty of detection; population trends sometimes difficult to track.
    - Rare species that are tracked and have many documented sites, assume they're able to persist
    - Vulnerable if they don't have many sites outside of planning unit
    - Edge of range species
- Topics for future discussion:
    - How to treat difficult to detect species?
    - How to treat species known to the forest only as experimental populations?
    - Should we have a more definitive timeline after finish forest plan (e.g., every 2-5 years have another look at the SCC list). Should we have a plan to re-evaluate the species list every 2 years?
- Ideas for future learning:
    - Partnering with others in the monitoring of SCCs
    - Improve sharing digital data on occurrences
    - While this workshop is good, probably won't have enough time to resolve differences. Need a 3-day follow-up workshop with specialists from WO and region to really address the issues

3.8 Region 10 – Alaska Region

- Started looking at more than 100 species. Many weren't known to occur, and at least 1 extirpation.
- Gray literature was very important. Large community of researchers.
- Public engagement lessons learned:
    - Utilized engagement process of assessment was the public engagement for SCC.
    - Draft assessment was first time public got to see SCC list. There was confusion early on of what this was.
    - Forest didn't know that this was something public would review.
- After the SCC letter came out last year, added the Aleutian Cress, a climate change indicator to the list and now we have 2 species on Chugach.
    - Have always thought of these as a living list. We need to have a discussion on this. How will we address this?
- Known to occur:
    - An August 2016 letter from the Regional Forester to Chugach NF Forest Supervisor provided direction:
        - A species is known to occur in a plan area if, at the time of plan development, the best available scientific information indicates that a species is established or is becoming established in the plan area. A species with individual occurrences in a plan area that are merely "accidental" or "transient," or are well outside the species' existing range at the time of plan development, is not established or becoming established in the plan area. If the range of a species is changing so that what is becoming its "normal" range includes the plan area, an individual occurrence should not be considered transient or accidental.
- Capability to persist**:**
    - Criteria included: distribution within and outside the Region; dispersal capability; known or suspected trends in abundance, population and habitat; and current conservation status. We weighed these factors against current and future threats and vulnerability of the species or its habitat.

- Topics for future discussion:
    - Regarding whether we need plan components as we revise list. Would go through process of evaluation. IF you use coarse filter/fine filter approach, then it's unlikely you'll need to change your plan.
    - How can the SCC list be a living list? What makes that successful?

4.0 How to Advance Agency Learning On SCCs

Participants engaged in a facilitated dialogue on key issues raised in the regional sharing exercise and harvest of potential next steps. The summary of this discussion follows.

4.1 Discussion of "Key Considerations" document

In November 2015, a cross-directorate WO staff team initiated an "enquiry" among regional planners and specialists to assess whether there is a need to clarify existing policy, develop new guidance, provide educational materials or otherwise support regions and forests on SCC-related issues. Fourteen units representing 6 regions, all at various stages of the planning process, participated in the SCC Enquiry. The regions and Planning FACA received copies of a SCC Enquiry Report in Feb 2016.

In the spring and summer of 2016, there were follow-up conversations with Regional Natural Resource and Planning Directors about remaining questions from the SCC Enquiry Report. The EMC, WFWARP, and FM&RGE directorates undertook an integrated approach to developing a document that framed some "key considerations" for the SCC process (See Appendix B).

During the workshop, group discussions highlighted some natural alignment around many issues and processes related to SCC identification, recordings and associated decisions. Discussions also highlighted some on-going tension related to interpretation of the planning rule directives, which led to a robust conversation about how we can move beyond the key considerations document (Appendix B) and foster better communication and lesson sharing among our regions on this topic.

This Key Considerations document is attached here as Appendix B. This document does not represent agency policy or direction.

4.2 On-going challenges with communication and learning

Discussions related to communication and learning began with a sharing of current challenges, including capacity, understanding and tactics. Highlights of these conversations include:

- **Constraints of capacity, time**. We can't let "busy" get in the way of learning and improving.
    - Monthly calls overwhelm forests.
    - The more time we take, the less relevant the plan becomes.
- **Conflicts in personality, strained relationships**. Different thought processes between planners and specialists. Workshops like this help break down barriers.

    - Many specialists are used to the 1982 Rule and may not see connection to ecosystems approach in 2012 and conservation.
- **Imbalance in understanding and interpretation**.
    - Different and competing perspectives in understanding in planning and biological processes. There is a need for better internal understanding of each (don't compel action, etc.). Perhaps conflict comes from some taking an administrative analysis approach and some taking an ecological analysis approach?
    - We need to better maintain a culture of learning around the 2012 Planning Rule. Internal education (and external) and communication to fully understand planning and the 2012 Planning Rule. We need systematic ways to keep this going.
    - Concern about "where is conservation?" in the new planning rule. Some are feeling as though they couldn't see how conservation is moving forward in the *application of* the new planning rule. Conservation is achieved through a systems approach. Manage for the whole system.
    - This conversation reflects classic tensions between policy, law, ecology/science. Forest Service needs to continue to discuss.
    - Public cares about resilient landscapes, not the "list" of species.
    - We need to talk about the coarse filter (ecosystem level plan components) and how they relate to SCCs. If there is a grey area with SCC identification, it will be more reassuring to know you have very good coarse filter.
- **Issues with currently used tactics for sharing**.
    - Issues with PDLs
    - We continue to hear conflicting direction and interpretation within staffs, as well as across EMC/WFWARP. How can we ensure consistency?
    - Cannot solve all problems through memorandum. Need continued dialogue to see evolution of the decision making process.

4.3 Future Communication and Lesson Sharing

Discussions then flowed into a brainstorming session about ways we can advance agency learning and adjust future communication towards improved implementation and interpretation of policy. In general, there was group consensus around the importance of collective, continuous learning as it relates to SCCs.

- **What is needed?**
    - More **integration** of WO-Communications. Avoid or managed silo responses. Increase networks between RO/WO/staff areas.
    - **Strategy for learning** needs to be inclusive: line officers, state agencies, and partners. Create deliberate space for different experiences, opinions, etc.
    - Learning needs to be **on-going--adaptive** over time.
    - **Peer learning** will need to continue and be maintained over time.
    - Take a **bigger picture** rather than just SCC identification. Take an outcome approach where talk about the end we want to achieve and then work backward.
    - We have focused so narrowly on SCC identification. But once we have SCC, what do we do with them? Let's talk about project-level consistency check and monitoring!
- **Specific Ideas for improvements**

- WFWARP canvassed over 100 people at all levels of the agency about an ecosystem planning community of practice. It address knowledge transfer, peer-to-peer learning. Some ideas from the survey results included:
    - Topic-specific working groups
    - Lessons learned workshop
    - On-line reference library specific to SCCs
    - Focused seminars and conference calls. Promote across staff areas. Avoid pure round-robins.
- A group following up from EMC/WFWARP directors meeting in Ogden, UT recommended
    - monthly webinars on curated topics (not round robins),
    - establishing a SCC cadre that could serve as a central hub for questions and information and serve as SCC objection review team.
- Could promote learning "forest to forest"--as revisions begin, learn from those who have done it.
- A lot of tools already exist-- would be good to standardize those that are helpful and share broadly. (e.g. templates for species tables, and tables that show links between species, plan components, and monitoring questions/indicators). WO can help share information.
- We should focus tools and resources on how to make plans better (supported, timely, relevant)
- We can probably improve monthly planners meeting agendas and stop asking WO to talk about a topic every time
- Want to know who is working on SCC across the agency—make a list so regions forests can network!

5.0 Next Steps

Participants and facilitator then outline some concrete next steps associated with SCC lessons, communication and guidance.

Specific actions that surfaced during this final brainstorm included:

- Capture notes from today's and report out as if a symposium
- Share the Key Considerations document as an extension of these notes and with the understanding that the document represents considerable staff work intended to inform this (July 31) discussion. For those areas of the document where three remains significant agreement, these will be identified.
- WO directors committed to continue to convene groups like this for problem-solving and learning.
    - Set up substantial conversation around monitoring SCC
- Establish a "think tank" to help the agency develop better understanding of implementation.

Appendix A: Agenda

USFS Species of Conservation Concern Workshop

July 31, 2017

R8 Regional Office

Objective: To promote adaptive learning across the Agency in how we analyze, document, and identify species of conservation concern (SCC) and promote an inclusive dialogue in this continued learning. [*Note: will ask participants to come with prepared remarks for sharing, will distribute the key considerations document and ask for reflection on how their own learning is addressed (or not) in these*.]

10:00am	WELCOME and Introductions Introductions, overview, objectives for the day	*WO-Leadership*
10:15am	Francis Marion Key Lessons Learned The Francis Marion NF was the first to go through the SCC objections process. This session will allow time for the Forest and Region to share their lessons learned, including critical interactions and involvement of partners. *Facilitated conversation that blends presentation with Q&A.*	*Forest/Region staff* *Partners*
11:00am	Regional Sharing Each region will be asked to share lessons learned throughout their SCC process and provide reflections on how these lessons relate to recommendations in the key considerations document. They should identify items they believe the group needs to discuss in the afternoon. *Key to cover points:* your public engagement strategy and how you addressed known to occur in the plan area, capability to persist over the long term, and substantial concern. Region 8 should also include points about the SCC objection process. NOTES: Facilitation team will take careful flip chart notes, no PPT or technology, break as needed.	*Regional participants*

12:00pm	Lunch	*On your own*
1:00pm	Regional Sharing, continued.	
3:00pm	Break	
3:30pm	Group Discussion Facilitated dialogue on key issues raised in the regional sharing exercise and harvest of potential next steps	*All*
5:45pm	Outlining of Next Steps- Closing Remarks	Facilitator/Leadership
6:00pm	ADJOURN	

Appendix B: Key Considerations Document

NOTE: THIS DOCUMENT/APPENDIX DOES NOT REPRESENT AGENCY POLICY OR DIRECTION

Key considerations for identifying, documenting, and analyzing Species of Conservation Concern

Aug 30, 2017 (v12)

This document is a starting point characterizing the collective, present observations, and not a final, definitive determination around these topics. It provides explanations of these issues and some key considerations for how to address them based on additional inquiry and discussions among Regional Planners, Region and Forest level natural resources specialists, Washington Office staff, and lessons learned from the objections resolution process on the Francis-Marion National Forest plan. Relative to the ongoing implementation of the 2012 LMP Rule, the Agency's focus is on learning and adapting through myriad "partnerships" of managers, resource technical specialists, scientists, and other key stakeholders. As such, it is probable that this document will change as we learn together how to create and maintain sustainable socio-ecological systems (which is ultimately the intent of NFMA).
The 2012 Planning Rule introduces the concept of species of conservation concern (SCC) at 36 CFR 219.9(b), which requires that plan components maintain a viable population of species of conservation concern within Forest Service authority and within the inherent capability of the plan area. The rule defines a species of conservation concern as:

> [A] species, other than federally recognized threatened, endangered, proposed, or candidate species, that is known to occur in the plan area and for which the regional forester has determined that the best available scientific information indicates substantial concern about the species' capability to persist over the long-term in the plan area.

A central focus of the new planning rule is the ability to efficiently and effectively provide plan components that protect the diversity of plant and animal communities. The plan may do so with ecosystem plan components that broadly help to maintain ecosystem integrity and ecosystem diversity, and if necessary, with species-specific plan components. The Rule introduces the concept of SCC which, along with the consideration of federally listed species, helps focus planning on direction to increase the chances of persistence of the species over time. To meet this intent, Regional Foresters are to list SCC that are “known to occur in the plan area” and for which “the best available scientific information indicates substantial concern about the species' capability to persist in the plan area.”

As the Forest Service has implemented the rule, the WO has seen considerable variation in how the rule and directives have been interpreted regarding the identification of SCC. The following issues regarding identifying SCCs have arisen:

- How to define "known to occur on the plan area"
- How to define "capability to persist over the long-term"
- How to define "substantial concern"
- How to apply the "Must be Considered" and "Should be Considered" Categories
- How to engage with the public regarding SCC lists

No level of national or regional guidance can adequately address the numerous ecosystem- and species-specific circumstances in which biologists and botanists will be asked to apply the criteria for SCC identification (FSH 1909.12.52c). We recognize the application of criteria for identifying SCC, even in the context of the key considerations shared here, requires considerable judgment based on the specific information at the time of determination.

Topic: Known to Occur in the Plan Area

After creating a list of species to consider, one of the first steps in identifying species of conservation concern is to determine if a considered species is known to occur in the plan area. We never have complete or perfect knowledge, but the following considerations may be valuable:

Key Considerations:

- Review for inclusion as a SCC any species that uses or has a documented occurrence record on the plan area for any component of its life cycle including seasonal movements such as migration (where applicable). This review would include species that are known from old records.
- While accidental occurrence occurs for wildlife (e.g., a migrating bird species observed one time after a significant weather event) it is unlikely that a documented plant occurrence would be the result of an accident. As the directives state that, "a species with an individual occurrences in a plan area that are merely 'accidental' or 'transient' [...] is not established or becoming established in the plan area," it is unlikely that accidental occurrence would be a reason to remove a plant species from consideration as a species of conservation concern.
- Taxonomic uncertainty can play a role when determining if a species will be an SCC. For instance if there is disagreement about what to call something where some consider it a rare species and others think it should be combined in with a more common species, the taxonomic determination and related occurrences could have an effect on whether there is substantial concern about the species or if it is determined to be known to occur on the plan area. Taxonomic expertise requires highly specialized knowledge and so questions regarding taxonomic uncertainty may be difficult for units to address. Therefore units are encouraged to consult with taxonomic specialists in these situations.

- Use the best available science and an understanding of species such as habitat conditions and other life history requirements to determine if a documented occurrence is still valid. Standalone use of the number of years since occurrence has been visited is not likely to substantiate extirpation status.
- The Regional Forester may determine the species is known to occur in the plan area by using best available scientific information if all of the following conditions apply:
    - The Agency has an historical record of occurrence, and
    - The characteristics of the species are such that the species should still be present, and
    - The ecological conditions that support the species have been present at the occurrence location from the time of the last occurrence record to the present.

Topic: Capability to persist over the long term

The Forest Service Handbook (FSH 1909.12, ch. 20, sec. 23.13c, paragraph 1c) explains how to determine whether a species can "persist over the long term," but still there have been multiple and diverse applications of the phrase in Forest planning efforts. More clarification may be valuable to ensure greater consistency. A longer time frame for analysis is needed when there is greater uncertainty due to climate change and human disturbance. To aid in making this determination, consider the following practices:

Key Considerations:

- To determine a proper time interval for species capability to persist beyond major disturbance events, consider the following:
    - Reproductive capability relative to timeframe of recovery of ecological conditions after a major disturbance event
    - Ability and time to move to or establish in areas that have supporting ecological conditions that are outside of the locations of major disturbance events
    - Ability and time to recolonize the area of disturbance
- To determine a proper time interval for species capability to persist when restoration after disturbance of ecological conditions may not be possible for the locations at documented species occurrence, think through the following:
    - Ability and time to move to or establish in areas that have or could have supporting ecological conditions
    - Ability and time to adapt to changing ecological conditions

The complexity of the analysis should be based on available information from the best available scientific information for the species and on the assessment topics relating to the ecological conditions that support the species, including effects of drivers and stressors on those conditions.

Topic: Application of "Must be Considered" and "Should be Considered" Categories

We recognize that the nuances of "must" and "should" as written in policy can be confusing. These key considerations provide some clarity on use of "must" and "should" and application of NatureServe ranking criteria, according to the Planning Handbook (FSH 1909.12).

Key Considerations:

- The NatureServe rankings listed in section 12.52d refer to rounded ranks, not element ranks. For instance, if a species has an element rank of "S2?," "S2S3," or "S1S3," the rounded rank is S2. So therefore when the handbook says S2 species should be considered, species with rounded rank of S2—and this could mean an element ranks of "S2?," "S2S3," or "S1S3,"—should be considered. More can be found about NatureServe rounded ranks on their website. This interpretation of rounded ranks has been updated to be consistent with current NatureServe methodology and is different than previous interpretations.
- According to FSM 1110.8, when the word "must" is used in Forest Service directives the "action is mandatory and full compliance is required." When the word "should" is used, the "action is mandatory, unless a justifiable reason exists for not taking action." Therefore whereas it is mandatory that G/T1 and G/T2 be considered, it is only mandatory that G/T3, S1, and S2 be considered if there are no "justifiable reason[s]" or "extenuating circumstances" for not considering them. There is no requirement for species with a NatureServe rank of S3 to be considered. However, a species should not be eliminated from consideration simply because it is ranked S3.

Topic: Substantial Concern

The determination of substantial concern can be complex. To aid in making this recommendation, consider the following practices:

Key Considerations:

- There are a host of information sources that can contribute to evaluating substantial concern such as NatureServe, State Heritage Programs, USFSW Birds of Conservation Concern List, PIF species assessment database, NRIS, more locally-specific or unit-derived scientific information, and other scientific information provided by the public.
- We understand that in some places and for some species, NatureServe data may be the only available BASI. In these circumstances, NatureServe general assessment information can be used as the only source of BASI when identifying potential SCC.
- Further, a NatureServe ranking of G/T1, G/T2, G/T3, S1, or S2 may be sufficient evidence to demonstrate substantial concern.
- For species considered but not identified as potential SCC, documenting how BASI has informed your determination has been shown to be critically important. Examples of rationale used in the Directives that substantiate not identifying a potential SCC include:

1. the species is not established or becoming established on the plan area; or
2. the species is secure and its continued long-term persistence in the plan area is not at risk based on knowledge of its abundance, distribution, lack of threats to persistence, trends in habitat, or responses to management; or
3. there is lack of sufficient scientific information available (FSH 12.52b and c).

Topic: Public Participation

The planning rule encourages early and frequent public engagement in the planning process. Much of the analysis related to SCC could happen very early in the process before documents are normally shared for public review. It is conceivable that some draft planning documents shared with the public include assumptions about SCC that the public was not aware of, and may disagree with, and/or may have additional information that should have been considered. To provide efficient public participation and avoid controversy late in the process consider the following practices:

Key Considerations:

- Provide the potential SCC list to the public during the assessment phase of planning.
- Seek early public engagement and input regarding the potential SCC list (well in advance of the DEIS) - ideally, the list is developed before scoping on the Need for Change. Information shared with the public should include rationale for why species are on the list, and why some species were considered but not added to the list (if applicable), along with supporting Best Available Scientific Information (BASI).
- After considering public concerns, release the SCC list that will be used to inform plan components as well as a description of how the agency considered public comment. The SCC list should be shared with the public before the DEIS goes out for its formal public notice and comment period. Posting it on the Forest's web page for the revision and reengaging those who helped develop it is recommended.
- Openly state that identification of SCC is a dynamic process and that as new scientific information and public input are received, changes in the SCC list for the Final EIS and final revised forest plan may occur. The Regional Forester may update the SCC list at any time. If there is new information, guidance on how to respond is found in FSH 1909.12, ch. 20 sec. 21.22b.
- All public engagement opportunities should be listed in the public participation strategy, including clear points in time for people to provide feedback, and when that feedback includes an opportunity to provide substantive formal comments. Be clear that the public will have an opportunity to provide substantive formal comments on the SCC list and those comments will give them eligibility to object on identification of SCC.
- The responsible official determines the methods, forum, and timing of comment opportunities, as well as the degree to which these comments are responded to, if they are not tied to a formal NEPA notice and comment period.
- Make sure information is easily accessible and kept current, relevant and summarized.

- Take time upfront to explain in plain language the role of SCC, how they are identified and evaluated, how the SCC process fits into the larger planning process, and how SCC may affect plan components and future management. Ideally, do this in a forum that allows for dialogue, questions and answers, and clarification.
- Document the BASI used for potential list proposals and final list development and why/how this body of information and/or specific aspects of it were used. Ensure those documents are available for public review.
- Ensure rationale and BASI are available to the public throughout the development of the SCC list and the rest of the planning process, including documentation around those species not included in the list.

Appendix C: Regional Flipcharts

REGION 1: Northern Region

PUBLIC ENGAGEMENT STRATEGY:

- Combined SCC public engagement and comment period with forest plan revision public engagement (public meetings/work groups and formal comment)
- Regional website hosts the SCC process description and species review documentation
- Initiated verbal communications at key points with key interested publics, particularly around controversial subjects and changes
- Requires coordination with forests to sort comments (e.g., through CARA) to ensure agency is responsive to all comments

OTHER IMPORTANT TIPS AND/OR LESSONS LEARNED

- "Must be native": Do you have reliable evidence that, historically, the species was established in the plan area before translocations occurred?
- The list is constructed, not deconstructed
- No species are automatically included, despite any other status they may have (*contrary to key considerations document*)
- Plan components can be provided for ecological conditions, communities or species that are not SCC

HOW "KNOWN TO OCCUR" IN THE PLAN AREA WAS ADDRESSED & DOCUMENTED:

- Must have documented evidence of actual occurrence on NFS lands in the plan area
- No speculation on habitat potential
- No extension from adjacent lands or inholdings
- *If you don't know it occurs, it is not known to occur*
- State NHP records and NRM observation database records are BASI for most species
- Some species required reliable physical evidence such as DNA, track plates, and in-hand accounts (e.g., museum specimens, trapping records)
- Casual visual observations of animals or tracks did not suffice even if the records were accepted by a state NHP
- NatureServe's 20-40 year timeframe used to distinguish historic records (as per the WO review of the Flathead)

HOW "CAPABILITY TO PERSIST" OVER THE LONG TERM WAS ADDRESSED & DOCUMENTED:

- Based on capability to provide **ecological conditions** needed by species
- Key ecosystem characteristics
- Limiting factors
- Tangible threats
- ***Consistent with revision documents***
- Struggled to specifically define "long term" for the multitude of individual species
- For aquatics, if use disturbance return interval at higher elevations, this could be hundreds of years. That seems to make "long term" moot when using this term for aquatic animal inclusion/exclusion
- For certain plant species, low population numbers or restricted ecological conditions (habitat) within the plan area (FSH 1909.12, 12.52d.3.f[4]) were the basis for substantial concern – but

only in cases where there was sufficient targeted inventory information and the habitat has been or could be affected by management activities

TOPICS FOR GROUP DISCUSSION:

*What constitutes sufficient information?

- R1 drafted some criteria for evaluating whether there is sufficient information to determine occurrence or persistence, since this is a primary threshold for SCC status

*How do we balance for consistency in approach without narrowing interpretation?

- Identify deal breakers – and define the respective interpretations
- Allow varying interpretations with everything else
- The WO must communicate these items – and be willing to back them - with the FACA committee and with Regional Foresters

*Since there isn't any manual direction for SCC yet (e.g., 2680), what process for project evaluation will be followed on those units where plan RODs are signed and they have SCC lists, so therefore are no longer operating under sensitive species/BE direction?

*Differences in documentation among regions – spreadsheets vs. detailed species accounts – is this an issue?

*In many cases the forest and regional botanists/biologists are the experts on species in the plan area

IDEAS FOR PROMOTING ONGOING & INTENTIONAL LEARNING AROUND SCC DESIGNATION:

- The WO must speak loudly with one voice if regional consistency is desired
- Track lessons learned with concise WO documentation available for practitioners

REGION 2: Rocky Mountain Region

PUBLIC ENGAGEMENT STRATEGY

- Involve state agencies early (e.g., natural heritage, division of wildlife)
- Include all appropriate staff (botany, fish, wildlife) at the Regional and unit level
- Include appropriate staff in the development of public engagement process
- Have full IDT participate in public engagement
- Tailor public engagement to where you are in the development of SCC and the audience
- Be all inclusive when responding to external groups
- Engage early and often to reduce confusion among the different lists or version of "the" list

HOW "KNOWN TO OCCUR" IN THE PLAN AREA WAS ADDRESSED & DOCUMENTED

- Started with local version of Regional Forester Sensitive Species list.
- Assess the unit's capacity to move into the process existing staff and data – identify gaps
- The current guidance or criteria regarding "known to occur" leaves room for interpretation. All species currently on the Rio Grande proposed list have documented occurrence. Our interpretation for occurrence included:
    - Plants occur if they are rooted there – there is no accidental or transient occurrence for plants
- Potential issue for supplemental guidance include:
    - Qualifiers for how many occurrences are needed or how recent they should be.
    - Use of single occurrence as accidental or transient

    - How to incorporate the BASI in conjunction with the species (plant or animal), wide-ranging or sedentary, and the current and historic range for the species
    - Monitoring challenges that can impact "known to occur" (nocturnal species, invertebrates, specialized species, small mammals)

HOW "CAPABILITY TO PERSIST" OVER THE LONG TERM WAS ADDRESSED & DOCUMENTED

- The current guidance or criteria regarding "capability to persist" leaves room for interpretation. All species currently on the Rio Grande proposed list have documented threats. Analysis and documentation highlighted these issues:
    - Conservation rankings need to include local information versus relying just on rankings
    - Significantly changed habitat conditions are contributing to capability to persist
    - Region 2 has detailed state natural heritage program plant data from that provides unit-specific threat for many species
    - Climate change vulnerability assessments also contain data, however we should not be solely relying on "generalized threats" due to a scarcity of information.
    - The importance of addressing: key ecosystem characteristic information, BASI, and analysis for individual species.
- Documentation and tools:
    - Spreadsheets tools were used during the assessment to document conservation rankings – developed into a database.
    - Species that are removed from early lists should be documented:
        - DEIS indicates that specific species were analyzed, with documentation, and why each are not included in the proposed SCC list
        - Recognize that the process is adaptive
        - Indicate how plan components relate to these species

TOPICS FOR GROUP DISCUSSION

- Clarification of:
    - Criteria for "known to occur" that supports consistency, but allows for flexibility. Include expectations for the use of historic vs. current occurrences
    - The importance of the plan components, rather than the size of the list.
- BASI:
    - There is a need to ensure BASI is being used appropriately and to develop science based partnerships for incorporation and review of the science.
    - A localized SCC support group (academia, research, etc.) could be established for review
- Plan Component Development:
    - Find creative opportunities to address species during development of plan components, for example group by ecosystem association
    - Suggestions on the tie between plan components and the species habitat conditions
    - Make a strong tie between SCC and ecosystem characteristics and the monitoring plan for assessing viability.
- Internal coordination:
    - Ensure strong coordinate across boundaries including different regions and Forests not in revision

    - Ensure that the proper staff is engaged and that there is adequate time for interaction and communication between Regional renewables and planning staff and the unit interdisciplinary team
- External Coordination:
    - Ensure that the SCC process involves outreach and engagement of science-based entities as encouraged in the planning rule
    - Engage local land management agencies and conservation groups in the SCC process
    - Take time to evaluate input from public

IDEAS FOR PROMOTING ONGOING & INTENTIONAL LEARNING AROUND SCC DESIGNATION

- Include external reviews by science based partners (USFS Research, academia)
- Build interdisciplinary involvement and external reviews into the process, including the monitoring plan
- Face-to-face interdisciplinary meetings and work sessions throughout the process to promote learning
- Communicate expectations from line officers to team members early, frequently, and clearly

REGION 3: Pacific Southwest Region

PUBLIC ENGAGEMENT STRATEGY:

* R3 Forests were exhaustive in coming up with as comprehensive a list of potential species as possible to take through the SCC screening process – they utilized not only Nature Serve, but supplemented by including species from other agency and NGO lists of species they are concerned about, as well as engaging/inquiring with other knowledgeable individuals, organizations, tribes, universities, and agencies (Federal/State/County/local).

* The main public engagement strategy as the SCC list was being developed and refined was as part of each R3 Revision Forest's public engagement on their Assessment and Plan/EIS development – there was no set of public meetings/engagements specific to the SCC process, but certainly discussed at nearly every public meeting/engagement on their plan revision process.

* Each R3 Forest Species lead held/holds numerous one-on-one discussions on SCC list development with other agencies, organizations, tribes, and individuals, as requested throughout the revision process.

* Each R3 Forest posts their SCC screening documentation on their Revision website as they conclude their Assessment process, and update that documentation as they receive new or updated info throughout the Plan/EIS development process. The RF reviews and concurs (or asks for adjustment) on the potential SCC list at the conclusion of the assessment process, with the Forests publically sharing their potential SCC list/RF concurrence letter on their websites. The RF will revisit review/concurrence of a Forest's SCC list as key plan revision milestones are achieved (release of the draft plan/DEIS, release of the proposed final plan/FEIS heading into the objection process). The RO WFRP and Planning staffs are involved in an oversight and review capacity with the Forests throughout the SCC list development and updating process, from initial assessment development through the objection process.

HOW "KNOWN TO OCCUR" IN THE PLAN AREA WAS ADDRESSED & DOCUMENTED:

* Forests had to have had documented presence on the planning unit for the species at some point in time.

* How historical presence was used varied by taxon and habitat condition; mollusks or plants that have not been seen in decades were more likely to be carried forward than a butterfly or bird. Similarly, association with habitats that exhibit little to no departure (e.g. talus slopes) was considered more indicative of continued presence than more departed or unstable habitats.

* We did not impose any fixed time limit for information to be out of date, but did not preclude the use of a time limit if a good rationale was provided.

HOW "CAPABILITY TO PERSIST" OVER THE LONG TERM WAS ADDRESSED & DOCUMENTED:

* Habitat was evaluated using:

- Departure and trend in seral state/composition/natural disturbance.
- Status of essential habitat elements for species that are not addressed in departure and trend models (e.g., beaver dams for frogs)
- Extent of activities that contribute to departure and trend within suitable habitat (e.g., grazing occurs in 91% of existing habitat)
- Extent and magnitude of activities that contribute to disturbance or disruption of behavior or essential habitat (e.g. 49% of falcon nest sites exposed to recreational rock climbing)

* Population and distribution trend were evaluated where these were known.
* Known diseases were considered (e.g. sylvatic plague for prairie dogs, chytrid fungus for frogs).
* Insufficient information was noted if we truly had no information on either habitat, the nature of threats to the species, and/or population trend.

TOPICS FOR GROUP DISCUSSION:

* With RO guidance and oversight, need to have trust/respect that the Forest Species Leads have the expertise and knowledge to conduct the SCC list generation and evaluations consistent with rule/directives requirements.

IDEAS FOR PROMOTING ONGOING & INTENTIONAL LEARNING AROUND SCC DESIGNATION:

* Annual National meetings (Planning lessons learned workshops) where Forests can share their experiences on SCC list development and evaluations and learn from each other.

REGION 4: Intermountain Region

Key learning around your public engagement process relative to designation of species of conservation concern;

- It takes more than one time to explain what SCC are and how they are identified, and then expect to explain it again.
- A simplified visual example (i.e. flowchart) of the criteria and/or the process is helpful.
- Keep things as clear and concise as possible when explaining SCC and the SCC criteria to the public.

- Develop a clear SCC purpose statement that describes how SCC will conserve species and help resource users.
- Contact key agencies or groups directly and early if you know or expect they will be able to provide information relevant to the SCC selection (e.g., State Fish and Game Agencies, FWS, plant societies, etc.).

How did you conclude that species are "known to occur" in the plan area?

Known to occur

- Must have reasonably current record or Element Occurrence [EO] on the Forest.
- Consider 20 years, unless BASI indicates otherwise.
- With regard to plants: Plant seed banks can exhibit long periods of dormancy (Ghost Orchid).
- Cryptic species or with narrow detection windows are often missed.
- It is difficult to determine rooted plants are accidental.

Not known to occur

- Species that occur in the vicinity of the Forest or have known suitable habitat on the Forest but for which there is no occurrence record. (Can add if new information indicates otherwise.)
- Species with only historical records, and for which the best available science leads to a conclusion that the species is no longer present; no definite standard for when a record or EO becomes historical. (As records become more historical, they are less likely to be 'known to occur').
- Species occurrence deemed accidental, transient, or well outside of the species range.
- Species not currently on the forest, but which the states or others are actively pursuing restoration back into historic range and habitats as part of a cooperative conservation strategy or plan. (Can always have plan components for other species, especially to coordinate planning with others.)

How did you conclude that the BASI indicated substantial concern about a species' capability to persist over the long-term in the plan area for the species you have identified as SCC?

Substantial concern

Some combination of threats either directly to the species or indirectly to its characteristic habitat: declines in the sizes and/or numbers of its populations and/or declines in its habitat.

- Must be supported by the best available scientific information, documented in standardized species assessment form.
- G1 and G2 rankings are considered sufficient information to indicate substantial concern if threats are present.
- Threats to species are considered regardless of source. FS management does not have to be the source of threats.
- Climate change, non-native species, and genetic swamping are valid threats for certain species.

Capability to persist

Ecological time, i.e. associated with ecological processes, ranging from dispersal and competition on the shorter end, to forest succession on the longer end; longer than the forest planning cycle, but bounded by processes that can be addressed through ecological analyses.

- Forests are asked to consider BASI for population size and trend, demographics, and habitat condition on the unit in making conclusions.
- G1 and G2 rankings are considered sufficient information to indicate substantial persistence concerns when threats are present.
- If data is unavailable to confirm a species persistence status in the plan area, consider other evidence, possibly in combination, from the Forest and other sources.

Identify any topics you would like this group to discuss…. (for example, differences in your process and the "Key Considerations Document", etc.)

On key considerations document

- In R4, S1, S2 and G3 species are not currently "expected" to be on the SCC list unless threats are to persistence are present. This new direction seems consistent with conservation, but no rational or reason is given why this should be a key consideration given the existing direction in the rule and directives.
    - "When taxonomic uncertainty exists (i.e., cryptic species), use expert opinion to identify species." **What if the experts create the taxonomic uncertainty?**
    - "If a species has not been recently verified as still existing (extant) in the plan area, use the best available scientific information to determine if presence is still possible. The regional forester should determine the species is known to occur in the plan area if all of the following conditions apply:
        1. The Agency has an historical record of occurrence, and
        2. The characteristics of the species are such that the species should still be present, and
        3. Ecological conditions in which the species lived at the time for which there is an historic record has not materially degraded. "

"If" and "possible" are indefinite and not the same as "known."

When it comes to plan development, how do we determine that we're providing for a viable population when we don't know what or where that population may be or what we're doing that may be affecting it?

Are there other ways to address these unknowns?

- Key considerations calls for documenting BASI for non-inclusion. **What if the issue is the absence of BASI?**
- **What is meant by "materially degraded"?** Suggest not adding a new undefined phrase.
- **WO response to answer shopping from Forests?** We have had Forests unhappy with our direction shop other Regions and the WO looking for and getting answers contrary to the directives.

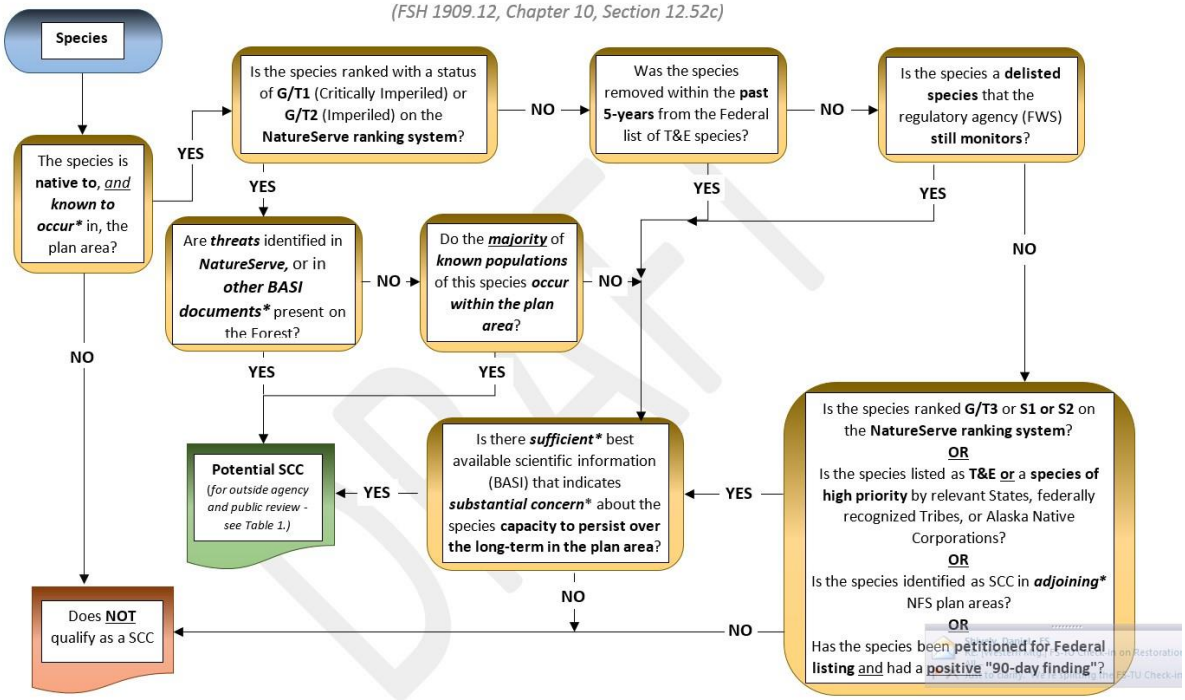
Identify any ideas you have for promoting ongoing & intentional learning around SCC identification.

- Infosheet to explain SCC role in managing for diversity, maybe back to back with explanation of what happened to MIS

- Handout with flowchart of process
- Informal comment opportunity on process on Regional web where RF-identified SCC will be provided for ongoing feedback (not the same as formal comment period of Forest's revision process).
- Develop and provide clear visual aids that simplify complicated content make things easier for the public as well as specialists.
- All specialists involved need to have a clear understanding of what SCC are and the criteria for their selection.
- Ensure that Forest level specialist understand that the Regional Forester identifies SCC and that decision may not match the Forest's recommendation.
- The RO needs to provide clear SCC guidance and expectations to the Forest. The RO should ensure consistent rational and conclusions are applied to all species considered for SCC and respect Forest input and analysis.
- Expect SCC plants lists to be larger than SCC Animal Lists. There are more plants than animals including narrow endemics.

DIRECTIVE-BASED PROCESS FOR DETERMINING POTENTIAL SPECIES OF CONSERVATION CONCERN UNDER the 2012 PLANNING RULE

(FSH 1909.12, Chapter 10, Section 12.52c)

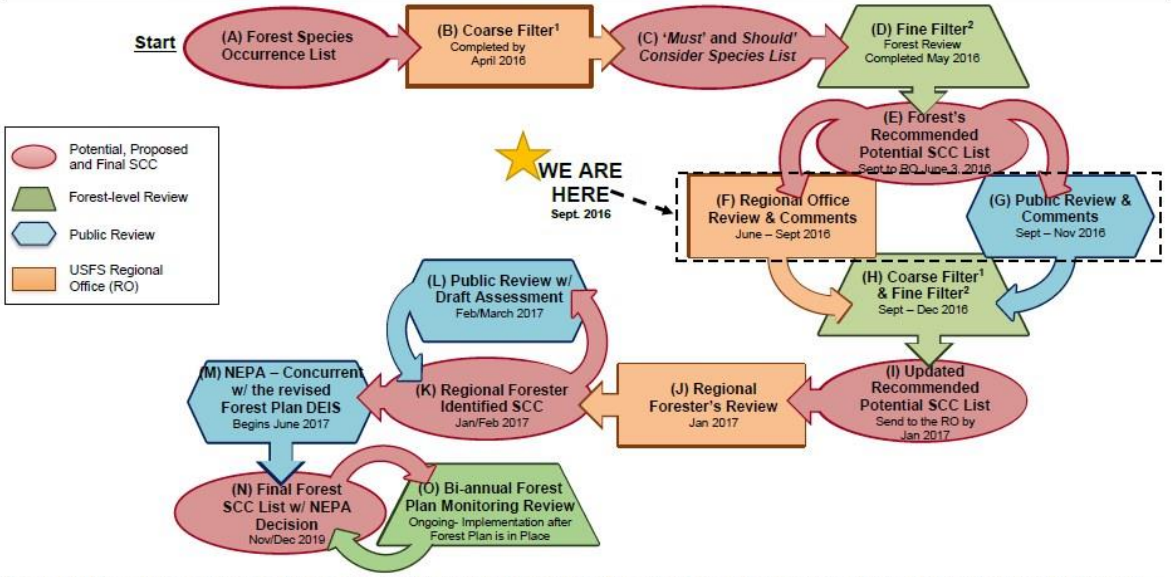


Manti-La Sal National Forest

*Species of Conservation Concern (SCC) Selection Process**

This flowchart describes the process followed to identify which species will be placed on the Manti-La Sal National Forest's SCC list.
This list will be incorporated into the revised Forest Plan per the 2012 Planning Rule (36 CFR 219) and the Forest Service Handbook (1909.12, Chapter10).

- The **Regional Forester** is responsible for deciding which species will be placed on the Forest's SCC list.
-The **Forest** is responsible for providing input, assisting in the review process and soliciting input from the public.



Species of Conservation Concern: A species *"…other than federally recognized threatened, endangered, proposed or candidate species, that is known to occur in the plan area and for which the regional forester has determined that the best available scientific information indicates substantial concern about the species' capacity to persist over the long-term in the plan area."* [36 CFR 209.9(c)]

*Additional information regarding this flow chart is available on the back side of this handout.

Updated Sept. 6, 2016

REGION 5: Pacific Southwest Region

KEY LEARNING AROUND YOUR PUBLIC ENGAGEMENT PROCESS RELATIVE TO DESIGNATION OF SPECIES OF CONSERVATION CONCERN:

- Be clear about criteria/process used to determine SCCs
- Demonstrate how BASI was used to make determinations
- Be clear how Regional Forester's Sensitive Species will/will not be included in SCC list and be able to explain why
- Include the public early and often in the development of the SCC list
- Be proactive to share information about why "pet" or controversial species do or don't make the list. Use BASI!
- Give clear examples of how SCC list influences the final forest plan
- Make sure the list is supported by the rationales

HOW "KNOWN TO OCCUR" IN THE PLAN AREA WAS ADDRESSED & DOCUMENTED:

Key Learning

- Species must have a known X/Y coordinate within the plan area with the caveat that species adjacent to forest boundary may be considered if:
    - It makes logical biological sense or
    - A species uses and depends upon the plan area to meet overall life needs e.g. major life cycle phase
- Historical records are considered on a taxonomic level utilizing BASI in terms of life expectancy and professional knowledge i.e. reasonable ecological interpretation

Tools

- Three primary databases were used: NRIS, BISON and State Heritage
- SharePoint
- EndNote

Challenges

- Working with more than one forest at a time
- The unknowns
    - Undocumented common species
    - Undocumented historic species
- Documenting all decisions throughout process

Variation from Key Considerations document:

We did not discuss "materially degraded" ecological systems that were associated with a historical record because:

- We have no real way of knowing the historic conditions and
- Disturbance or geological events could have dramatically modified the conditions.

Essentially there is often insufficient information to make this type of determination.

HOW "SUBSTANTIAL CONCERN ABOUT A SPECIES' CAPABILITY TO PERSIST OVER THE LONG TERM" WAS ADDRESSED & DOCUMENTED:

Key learning moments:

- Start the process early and pull your facts together early
- The more we involve the caring public in developing the SCC list, the stronger the list
- Developing initial rationales at the regional level provides basic consistency across the region
- You cannot say current and future management activities do not pose a threat due to protection measures

Tools:

- Existing RFSS accounts, 3rd party accounts and references in the accounts

Challenges:

- Professional vs. personal opinions
- There is additional workload associated with writing "negative declarations" for species that don't meet the bar for substantial concern
- Keeping the administrative record complete

Variation from Key Considerations document:

The recommended reliance on NatureServe information as a basis for development of potential Species of Conservation Concern status and recommendation is problematic:

- Utilizing NatureServe's general assessment information as a source of BASI would often be insufficient to show substantial concern as site specificity is mostly lacking.
- "Expecting" the potential list of SCCs that is submitted to the Regional Forester for approval to include all G/T1, G/T2, G/T3, S1 or S2 species contradicts the directives where only G/T1 and G/T2 are expected to be included on the potential list.

TOPICS FOR GROUP DISCUSSION:

- Concern that if the WO tries to be more prescriptive, then there will need to be more illustrative exacting case scenarios or the WO can just rely on handbook.
- We can always be "better" so when is it "good enough?"
- This process is dynamic so how do you manage the workload so you aren't reviewing it every week when the public points out a new published paper or reports a new field survey?

IDEAS FOR PROMOTING ONGOING & INTENTIONAL LEARNING AROUND SCC DESIGNATION:

- We are looking at SCCs across the region in terms of species accounts and region wide rationales with the goals of consistency, removing species from consideration where possible, and saving time.
- Utilizing detailers from across the region afforded earlier buy-in and understanding from the forest level.

- Utilizing third party experts to develop species profiles/accounts.
- We must understand the essentials necessary to make a good argument/rationale.

REGION 6: Pacific Northwest

PUBLIC ENGAGEMENT STRATEGY:

- Share the sources we will use to determine whether the must or should consider categories are met.
- Then we will share the list with that sources/information applied to develop a draft potential SCC list.

HOW "KNOWN TO OCCUR" IN THE PLAN AREA WAS ADDRESSED & DOCUMENTED:

Region 6 plans to rely on the following sources to determine the occurrence status of a species in plan areas within Washington and Oregon (including but not limited to):

- Field Guides for Washington and Oregon or similar books
- Interagency Special Status and Sensitive Species Program (ISSSSP) species fact sheets, conservation assessments, and conservation strategies
- Natural Resource Manager (NRM) TESP, NRM Wildlife, NRM Aquatic Surveys
- Regional and Forest GIS datasets (e.g. Redband trout distribution layer)
- Agency local knowledge of species on the plan area
- NatureServe BIOTICS database and the OR and WA state heritage databases (Oregon Biodiversity Information Center (ORBIC) and Washington Natural Heritage Program (WNHP))
- Partners in Flight (PIF) Avian Conservation Assessment databases and FWS Bird Conservation Region lists (BCR)
- And many more…..

Region 6 has not yet confirmed buffer distance around a plan area or the timeframe a species was last documented on a plan area. We are waiting on the national guidance.

HOW "CAPABILITY TO PERSIST" OVER THE LONG TERM WAS ADDRESSED & DOCUMENTED:

Region 6 has had discussions that 'capability to persist' and 'substantial concern' are interconnected concepts.

The process differs depending on the taxa group. A fish viability analysis process is currently being finalized along with the Aquatic and Riparian Conservation Strategy. A work group focusing on developing invertebrate viability process is currently underway. We plan to group species, knowing we can't conduct viability analyses for all the potential invertebrate SCC. And, we know we need to develop a flora viability process, but that will come after the invertebrate process and procedures are drafted.

Vertebrate terrestrial wildlife have published, peer-reviewed viability processes that will be used. In general after the SCC's have been identified based on the categories identified in the planning directives for must consider and should consider species

All viability processes and procedures would be scientifically peer-reviewed with the intention of publication in a scientific venue (e.g. GTR, journal article).

TOPICS FOR GROUP DISCUSSION:

- Consideration of regional comments on the SCC Key Considerations document
- How other regions are documenting their processes
- Lessons learned

IDEAS FOR PROMOTING ONGOING & INTENTIONAL LEARNING AROUND SCC DESIGNATION:

- Engaging the public on sources and process to develop SCC list prior to engaging with the actual list.
- Engaging partnerships with R&D and academia to ensure future research has ties to SCC and associated habitats and monitoring needs
-

REGION 8: Southern Region

PUBLIC ENGAGEMENT STRATEGY:

- Ensure key agency biologists (wildlife, botany, aquatics) are involved in outreach efforts, and both understand and communicate our criteria and process for listing of species of conservation concern.
- Conduct a targeted personal outreach of additional key individuals – in addition to providing opportunities for public comment within a public meeting setting; Ensure in person contact with applicable state and federal agencies responsible for species conservation.
- Work with species group experts to extent possible
- Posting information online allows for easy public access of information and updates.
- Start early and make sure release draft with assessment.

HOW "KNOWN TO OCCUR" IN THE PLAN AREA WAS ADDRESSED & DOCUMENTED:

- Species occurrence reviewed in field and located by USFS personnel or partners
- Used digital GIS data on element occurrences obtained from State Heritage Programs, maintained on USFS NRIS TESP databases, and animal and aquatic TES databases populated through past inventory and monitoring efforts, and local and expert knowledge;
- Species documented in NC Natural Heritage Program Biotics database and looked at where suitable habitat still persists
- Used a combination of sources: Literature reviews, inventory and monitoring reports and feedback from natural resource professionals that work in the area.
- Used a tracking spreadsheet to document our process of collaboration with the Regional Office from listing of potential to final SCC list, including rationale for inclusion as final SCC. *(This spreadsheet included species name, state and global ranks, numbers of element occurrences known from both in the planning area and the state, and habitat and population trend information leading to recommendations. Columns could be added as reviews were completed and species were eliminated from further consideration.)*
- Species life history requirements should be used for determining the current presence, instead of any arbitrary timeframe.

- However, will need some other considerations/reference points when looking at those species with obscure life cycles such as many mosses and liverworts. Particularly when there is no change in suitable habitat at historical occurrence site.

HOW "CAPABILITY TO PERSIST" OVER THE LONG TERM WAS ADDRESSED & DOCUMENTED:

- The team considered a number of factors:
  - Known threats within the planning area, such as non-native invasive species (plants, feral hogs), uncharacteristic forest structure or composition, inadequate fire regimes;
  - The amount of and condition of habitat available within the administrative boundary;
  - Natureserve rankings;
  - State priority listings;
  - Population number and status, population and habitat threats documented with element occurrence records in NRIS TESP;
  - Population and habitat trends as documented in monitoring reports or based on expert and local opinion and expertise;
  - Difficulty of detection (ex. Eastern coral snake, Northern pine snake).
- Trend data for most species is absent or obscure; as a result most determinations based on known threats to low number of species occurrences on planning unit. BASI is typically from species experts or Natureserve.
- Current rare tracked species with greater number of documented sites, with large healthy populations, are assumed to be able to persist in the planning unit
- Edge of range species – Even though may have healthy range-wide populations, if Forest is on edge of range and only limited populations within the planning unit – then assumed to be vulnerable within the planning unit.

TOPICS FOR GROUP DISCUSSION:

- How to treat difficult to detect species – such as species or species groups not well inventoried, difficult to inventory and detect, habitat and population trends not known, small populations and single occurrences;
- How to treat species known from the forest only as rescued or experimental populations;
- Having a more defined timeline for updating SCC list – suggest review every 2 years

IDEAS FOR PROMOTING ONGOING & INTENTIONAL LEARNING AROUND SCC DESIGNATION:

- Partnering with others both internally and externally, in the monitoring of SCC populations. Particularly in relation to habitat conditions and management.
- Improved collaboration with conservation partners on species most threatened by extinction – State Wildlife Conservation Plans, Plant Conservation Alliances, Amphibian and Reptile Conservation, USFWS, Natureserve.
- Improved sharing of digital data on population occurrences, populations, and habitat conditions.
- While this Workshop is good, there isn't really time to work out any differing points of view in what our SCC guidance should be. Really need something like a 3-day workshop comprised of specialists from both the WO and the Regions to try to work out an agreed approach.

REGION 10: Alaska

PUBLIC ENGAGEMENT STRATEGY:

- SCC evaluations began in 2012. External engagement at that time included species experts, as well as representatives from university, federal and state agencies. The draft Assessment was distributed to the Forests' mailing list for review and comment. The final Assessment was published in 2014 and included the draft SCC list as well as species that were reviewed and not included.
- Development of the 2017 DEIS included consultation and coordination with 8 Alaska Native Tribes and/or Corporations, 5 Federal agencies, 5 State of Alaska Departments, 3 communities, 25 organizations (including DOW, Sierra Club, CBD, and multiple local groups) and 4 businesses. The SCC deliberative record and supporting documentation has been provided to DOW as requested.

"KNOWN TO OCCUR" IN THE PLAN AREA:

An August 19, 2016 letter from the Regional Forester to Chugach NF Forest Supervisor provided direction:

> A species is known to occur in a plan area if, at the time of plan development, the best available scientific information indicates that a species is established or is becoming established in the plan area. A species with individual occurrences in a plan area that are merely "accidental" or "transient," or are well outside the species' existing range at the time of plan development, is not established or becoming established in the plan area. If the range of a species is changing so that what is becoming its "normal" range includes the plan area, an individual occurrence should not be considered transient or accidental.

"CAPABILITY TO PERSIST" OVER THE LONG TERM IN THE PLAN AREA:

Criteria included: distribution within and outside the Region; dispersal capability; known or suspected trends in abundance, population and habitat; and current conservation status. We weighed these factors against current and future threats and vulnerability of the species or its habitat.

TOPICS FOR GROUP DISCUSSION:

- Distinctions between regions (in Alaska, distinctions between two large forests)
- Variation in interpretations of the rule and guidance
- The perception / expectation for a certain number of species
- Ability for FS to affect conservation/persistence of rare species

PROMOTING ONGOING & INTENTIONAL LEARNING AROUND SCC DESIGNATION:

There is a need for guidance for project level assessments or lack of, for SCC.