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Forest Plan Revision
Nez Perce-Clearwater National Forests
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To the Planning Team:

Friends of the Clearwater appreciates the opportunity to comment on the Nez Perce–Clearwater National Forests Potential Species of Conservation Concern component of the Forest Plan Assessment (18.0 Potential Species of Conservation Concern, June 2014—updated 7/10/2014, hereinafter, "SCC Assessment"), as part of our ongoing, longstanding participation in the management of the Nez Perce and Clearwater National Forests.

At 36 CFR § 219.6(a) under "Process for plan development or revision assessment" the Forest Service is required to (1) "Identify and consider relevant existing information contained in governmental or non-governmental assessments, plans, monitoring reports, studies, and other sources of relevant information."

The SCC Assessment includes a list of 13 terrestrial Species of Conservation Concern (SCC), six aquatic SCC, and several plant communities of conservation concern, These are said to be known to occur in the plan area and for which the Regional Forester has determined that the best available scientific information indicates a substantial concern about the species capability to persist over the long-term in the plan area. **These comments focus on the terrestrial SCC.**

Forest plan revision is being conducted under the National Forest Management Act (NFMA) 2012 planning rule (36 CFR § 219 *et seq*., hereinafter "NFMA Rule"). The NFMA Rule explains that the public has a role in formulating the Assessment:

> Requirements for public participation. (a) *Providing opportunities for participation.* The responsible official shall provide opportunities to the public for participating in the assessment process…

(36 CFR § 219.4.) Since there has been no formal public process on the Assessment until now, we are commenting under the assumption that the Assessment is still in draft form.

In response to comments on the NFMA Rule, the U.S. Department of Agriculture (USDA) stated:

> The rule requires that species of conservation concern must be ''known to occur in the plan area'' and that the regional forester identify the species of conservation concern for which ''the best available scientific information indicates substantial concern about the species' capability to persist over the long term in the plan area.''

Friends of the Clearwater is exploring the process and results of the regional forester's identification of the SCC considered in the SCC Assessment, and we may provide further comments to you on that process once we know more. However, these comments focus on the content of the SCC Assessment, its use of the best scientific information available, its responsiveness to 2012 NFMA Rule requirements, and its use in the July 2014 Proposed Action for Forest Plan Revision Nez Perce-Clearwater National Forests (hereinafter "Proposed Action").

In multiple subsections, the NFMA Rule requires that the Forest Service **identify the best scientific information, use it in preparation of the Assessment, and explain how that science was used**:

> § 219.3 Role of science in planning. The responsible official shall use the best available scientific information to inform the planning process required by this subpart. In doing so, the responsible official shall determine what information is the most accurate, reliable, and relevant to the issues being considered. The responsible official shall document how the best available scientific information was used to inform the assessment, the plan decision, and the monitoring program as required in §§ 219.6(a)(3) and 219.14(a)(4). Such documentation must: Identify what information was determined to be the best available scientific information, explain the basis for that determination, and explain how the information was applied to the issues considered.
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> § 219.6 Assessment. (b) *Content of the assessment for plan development or revision.* In the assessment for plan development or revision, the responsible official shall identify and evaluate existing information relevant to the plan area for the following: (5) Threatened, endangered, proposed and candidate species, and potential species of conservation concern present in the plan area;
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> (3) Document the assessment in a report available to the public. The report should document information needs relevant to the topics of paragraph (b) of this section. Document in the report how the best available scientific information was used to inform the assessment (§ 219.3). Include the report in the planning record (§ 219.14).

Friends of the Clearwater is concerned that the SCC Assessment:

- Does not clearly state what is considered to be the best available scientific information,
- Does not always properly utilize the best available scientific information where it is identified,
- Documents in several places in a confusing manner how the best available scientific information was used to inform the SCC Assessment, and;
- Omits important scientific information that rightly should be included as best available science.

At p. 18-2, the SCC Assessment states:

> Potential Plan components will be based on habitat needs identified in the ICBEMP (Wisdom et al. 2000), the Idaho CWCS (IDFG 2005), and other known best available science. In addition, the "Habitat-Type Group" guidance previously developed by the Nez Perce–Clearwater National Forests could offer potential Plan components, as identified by the interdisciplinary team involved in that development.

It is clear that SCC Assessment identifies Wisdom et al. 2000 and the Idaho CWCS (IDFG 2005) as best available science. But it does not clearly state what other ICEBEMP scientific information or the mentioned Habitat-Type Group guidance has also been identified as best available science.

An example that applies to multiple SCC in the SCC Assessment is the fisher. Best available science explicitly identified in the SCC Assessment for the fisher includes Olsen et al., 2013 (18-6), Raley et al. 2012 (18-31), per. comm. Sauder 2013, per. comm. and Schwartz 2013 (18-33). The SCC Assessment also states:

> The following issues have been identified as a starting point for integrating potential resource objectives for this species and its source habitat with broader, ecosystem-based objectives for other resources (Aubry et al. 2013, Buck et al. 1994, Hollenbeck et al. 2013, IDFG 2005, Jones and Garton 1994, Lofroth et al. 2011 and 2012, Naney et al. 2012, Nez Perce Tribe 2011, NPCC 2003, NPCC 2004a and 2004b, Olsen et al. 2013, Powell and Zielinksi 1994, Sauder and Rachlow 2013, Schwartz et al. 2013, USDA Forest Service 2014; Wisdom et al. 2000):

(18-34.) The SCC Assessment doesn't clearly state whether **each of those sources** are considered best available science for the fisher. There are similar statements of scientific sources for other SCC, which need to be clarified.

Also at 18-34, the SCC Assessment states, "The application of Olsen et al. (2013) is the best available science that quantifies 'potential' fisher habitat for the Northern Region (Region 1) forests to date." This raises the question—is the Nez Perce–Clearwater National Forests saying that its own ***application of*** such and such is considered to be best available science?

Also, at 18-73: "Best available science has documented the management risks and strategies to manage for (Coeur d'Alene Salamander)." And at 18-90: The Coeur d'Alene salamander …will be addressed using other best-available science and in the Idaho CWCS discussions. But the SCC Assessment doesn't explicitly state **what science** is being used as the best available for that species.

Another example of ambiguity in discussion of best available science is found at 18-15, in a discussion regarding the white-headed woodpecker:

> Using the SIMPPLLE process (Chew et al. 2012), a mid-scale habitat model using vegetative parameters capable of being modeled across the entire forest and best fitting the characteristics of habitat described in the best available science has been developed for the Forest (SIMPPLLE SCC models 2013).

The above is very hard to decipher. Does it mean that both Chew et al. (2012) and SIMPPLLE SCC models (2013) are considered to be the best available science for the white-headed woodpecker? Or is it stating that the SIMPPLLE SCC models **uses** the best available science?

"Broad-scale family groups, as well as meso and fine-scale biophysical settings, habitat type groups, and a non-habitat type group are used for describing SCC habitat associations and conditions based on best available science." (SCC Assessment at 18-10.) What "best available science"? Once again, the SCC Assessment is throwing around the term "best available science" loosely.

At p. 18-4, the SCC Assessment states, "Mesofilter management for the SCC in this Assessment was identified by examining the best available science for SCC species…" This implies that for each of the potential SCC best available science has been identified, yet explicit reference to best science is omitted for several potential SCC.

The Proposed Action states, "There is a need to revise the plans to incorporate new and emerging information in plan direction." However it is not clear how or if **later planning stages** (programmatic or project) will use or consider new or other scientific information—submitted by the public, other agencies, etc.—as potentially additional "best scientific information."

In the overall planning process, we believe it's a no brainer that the Forest Service use *Committee of Scientists: Sustaining the People's Lands. Recommendations for Stewardship of the National Forests and Grasslands into the Next Century. March 15, 1999* (Committee of Scientists, 1999). The Committee of Scientists report was initiated as part of the original NFMA planning rule revision in the 1990s, as explained in its Synopsis:

> In December 1997, Secretary of Agriculture Dan Glickman convened an interdisciplinary Committee of Scientists to review and evaluate the Forest Service's planning process for land and resource management and to identify changes that might be needed to the planning regulations.

Committee of Scientists, 1999 was even cited multiple times in the USDA's responses to comments on the NFMA Rule. These comments identify and cite some important portions of the Committee of Scientists, 1999 report that we believe would improve the Assessment as well as the entire forest plan revision process.

Again, the SCC Assessment is not clear on **how** the best scientific information was identified, making it seem altogether too arbitrary. And the agency needs to clearly state how it will address other scientific information that conflicts, contradicts, or disagrees with the science it considers "best available" when such information is submitted by the public or other agencies.

The SCC Assessment includes a list of 13 terrestrial SCC that are "known to occur in the plan area and for which the Regional Forester has determined that the best available scientific information indicates a substantial concern about the species capability to persist over the long-term in the plan area." However, the SCC Assessment omits ten terrestrial species on these two forests' current list of Sensitive species, for which by definition there is current belief by the Regional Forester of a substantial concern about long-term viability. These include the peregrine falcon, bald eagle, black-backed woodpecker, black swift, common loon, Harlequin duck, wolverine, bog lemming, western toad, and ringneck snake. Since the Regional Forester expresses substantial concern about those ten species' long-term viability, the SCC Assessment should include them as potential SCC or disclose the best scientific information available that unequivocally demonstrates there are no longer viability concerns for those 10 species.

The SCC Assessment also omits at least two other species native to the planning area, which have been extirpated or for which there are scant observances in recent years. These include the grizzly bear and woodland caribou. Are we to take it that the USDA believes there is no requirement to manage for habitat conditions that would assist in the restoration and recovery of populations of these native species? We also note that the grizzly bear and woodland caribou were omitted from the Assessment's "5.0 Threatened, Endangered, Proposed, and Candidate Species June 2014."

The SCC Assessment also seems to improperly utilize its best available scientific information as identified. As one example, this how the SCC Assessment cites Wisdom et al (2000) in regards to management issues facing wildlife species in Family 2:

- Declines in late-seral forests of subalpine, montane, and lower montane communities and associated attributes such as large trees, snag, and down logs
- Tradeoffs between source habitats for species in Family 2 and habitats for species in Family 1
- Balancing the fragmentation of late-seral habitats for fisher and boreal owl versus the juxtaposition of early- and late-seral habitats for other species
- Broad-scale departures from historical landscape patterns
- Reduction in the extent of frequent, light underburning and light surface fires

Contrast that with the issues identified in Wisdom et al. (2000):

1. Declines in late-seral forests of subalpine, montane, and lower montane communities and associated attributes such as large trees large snag (sic), and large down logs, lichen and fungi.
2. Tradeoffs between source habitats for species in family 2 and habitats for species in family 1.
3. Balancing the fragmentation of late-seral habitats for marten, fisher, and boreal owl versus juxtaposition of early- and late-seral habitats for silver-haired bat, hoary bat, and great gray owl.
4. Broad-scale departures from historical landscape patterns.
5. Negative effects of road-related human activities.

6. Reduction in the extent of frequent, light underburning and light surface fires.

In its first bullet, the SCC Assessment omits the adjective, "large" in reference to snags and down logs—this is a significant difference, as the scientific literature clearly indicates (See, for example, the size of dead tree highly preferred by the keystone wildlife species pileated woodpecker[1], as discussed in McClellan and McClellan, 1999 and in the Northern Region's own USDA Forest Service, 1990.) Also, we note that lichens and fungi were omitted, without explanation.

From its fourth bullet, the SCC Assessment omits silver-haired bat, hoary bat, and great gray owl as mentioned in Wisdom et al. (2000), again without explanation.

The SCC Assessment entirely omits the Wisdom et al. (2000) bullet, "Negative effects of road-related human activities." Huge bibliographies of scientific information indicate the highly significant nature of "departure from historic conditions" that are the impacts on forest ecosystems caused by motorized travel routes and infrastructure. That there are no road density standards in the forest plan revision Proposed Action suggests the biased and arbitrary manner of the Forest Service's use of its own "best available science." From the Wisdom et al. (2000) Abstract:

> Our assessment was designed to provide technical support for the ICBEMP and was done in five steps. … Third, we summarized the effects of roads and road-associated factors on populations and habitats for each of the 91 species and described the results in relation to **broad-scale patterns of road density.** Fourth, we mapped classes of the current abundance of source habitats for four species of terrestrial carnivores in relation to **classes of road density** across the 164 subbasins and used the maps to identify areas having high potential to support persistent populations. And fifth, we used our results, along with results from other studies, to describe broad-scale implications for managing habitats deemed to have undergone long-term decline and for managing species negatively affected by **roads or road-associated factors**.

(Emphasis added.) There are an infinite number of other ways the SCC Assessment could have skewed its interpretation of Wisdom et al. (2000) or other sources of best available science. Therefore the agency must explicitly state if the **scientific sources** are the best available science, or if **the agency's interpretation** of its scientific sources is the best available science. If it is the latter, the Forest Service has a lot of "**explain(ing) the basis for (its) determination**" to do!

So the question again arises: How will the Forest Service address new scientific information in its programmatic and project planning, as well as alternative interpretations of the "best science" it cites, and finally, other scientific information that is specifically submitted for consideration as "best science" even though it conflicts, contradicts, or disagrees with its "best science"?

Not surprisingly, the SCC Assessment skews the fire issue, offering as a Conservation Strategy, "Continue a strategy of wildfire suppression in most managed forests while allowing stand-replacing wildfires to burn in wilderness areas." Contrast that with the Wisdom et al. (2000) version, "Continue a strategy of wildfire suppression in most managed forests while allowing stand-replacing wildfires to burn in wilderness areas, **areas of critical environmental concern (ACECs), and other natural process areas**. **Stand-replacing wildfires in such natural process areas are of particular benefit to black-backed and three-toed woodpeckers**…" (Emphasis added on omitted text.)

[1] The pileated woodpecker is a Management Indicator Species under the current Forest Plan for both Forests.

To sum up our comments on the SCC Assessment so far, it fails to adequately **"Identify what information was determined to be the best available scientific information, explain the basis for that determination, and explain how the information was applied to the issues considered."** (NFMA Rule at 36 CFR § 219.3.)

Before we discuss more specifics regarding wildlife or groupings of wildlife in the SCC Potential Species of Conservation Concern, we take this opportunity to comment on the topic of another category of species in the NFMA Rule—**Focal Species**. The Committee of Scientists (1999) states that focal species should be identified in the Assessments:

> Bioregional assessments should develop an integrated and synthetic analysis of the best scientific and technical information about the historical and current diversity of native plant and animal communities, the productive capacity of ecological systems in the bioregion, the social and economic context, existing institutional arrangements, and current stewardship capacity. To achieve this goal, **assessments should at least:**
>
> > **1) Define the focal species for use in the analysis of species diversity in planning and develop procedures for estimating the viability of focal species, threatened and endangered species, and sensitive species.** Apply these procedures to estimate the viability of these species under likely management in the region while allowing, to some degree, for uncertainties that may develop (e.g., changing levels of funding, natural disturbances, and competition from exotic species). As a result of this analysis, highlight risks to species viability…

(Emphasis added.) However, neither **the SCC Assessment nor other document in the Assessment even identifies focal species.** The Forest Service seems to be at a loss on how to deal with focal species. The Proposed Action states:

> The Forest will be developing the monitoring program based on public comment provided on this proposed action and the analysis of alternatives for the EIS. We are seeking your input on focal species and indicators selection, opportunities for multi-party monitoring, and sources of relevant scientific information.

That's all there is about focal species in the Proposed Action. Interested parties must look to the NFMA Rule, where focal species is defined as:

> A small subset of species whose status permits inference to the integrity of the larger ecological system to which it belongs and provides meaningful information regarding the effectiveness of the plan in maintaining or restoring the ecological conditions to maintain the diversity of plant and animal communities in the plan area. Focal species would be commonly selected on the basis of their functional role in ecosystems.

But the $64,000 question is: How **will** the eventually identified focal species "provide meaningful information regarding the effectiveness of the plan in maintaining or restoring the ecological conditions to maintain the diversity …in the plan area"? Based on the guidance in the NFMA Rule and the USDA's responses to comments on the rule, almost nothing of any certainty can be said.

We look to the USDA's responses to comments on the NFMA Rule to provide further explanation of how the revised forest plan will use focal species, because the definition in the rule is so vague. The USDA says:

> Appropriate monitoring of focal species will provide information about the integrity of the ecosystem and the effectiveness of the plan components in maintaining diversity of plant and animal communities in the plan area. In other words, focal species monitoring is used as means of understanding whether a specific ecological condition or set of conditions is present and functioning in the plan area.
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> …Focal species …are species whose presence, numbers, or status are useful indicators that are intended to provide insight into the integrity of the larger ecological system…

> …Focal species monitoring provides information regarding the effectiveness of the plan in providing the ecological conditions necessary to maintain the diversity of plant and animal communities and the persistence of native species in the plan area.
>
> Monitoring for …focal species will also provide information about the effectiveness of plan components for at risk species.[2]

Essentially, this means that focal species are basically to be used as monitoring tools, to check on the effectiveness of forest plan components for maintaining "at risk" [3] species and the diversity of plant and animal communities on the Forests, and whose presence, numbers, or status as monitored are intended to provide insight into the Forests' ecological integrity.

However, not only are focal species to provide insight into the effectiveness of forest plan elements, the USDA states that they are also to **provide insight into the NFMA Rule itself**:

> Focal species …are species whose presence, numbers, or status are useful indicators that are intended to provide insight into …the effectiveness of the § 219.9 provisions.

Truly, whatever focal species are chosen, they must be broad shouldered!

This begs another question: How will the status of focal species be measured? The USDA admits the Rule is vague, and largely says what is **not** required:

> …The rule does not specify how to monitor the status of focal species. …The objective is not to choose the monitoring technique(s) that will provide the most information about the focal species, but to choose a monitoring technique(s) for the focal species that will provide useful information with regard to the purpose for which the species is being monitored.
>
> …Focal species monitoring is not intended to provide information about the persistence of any individual species. The rule does not require managing habitat conditions for focal species, nor does it confer a separate conservation requirement for these species simply based on them being selected as focal species.
>
> … (P)opulation trend monitoring is not required by the final rule.

The USDA does suggest how focal species **might** be monitored: "Monitoring methods may include measures of abundance, distribution, reproduction, presence/absence, area occupied, survival rates, or others." So, the $64,000 question remains largely unanswered.

The Committee of Scientists (1999) states:

> Given the importance of monitoring for ecological sustainability, a critical step will be to broadly define ecological attributes to include any biotic or abiotic features of the environment that can be measured. The convention has been to refer to the measured attributes as "indicator variables" under the assumption that their values are indicative of the integrity of the larger ecosystem to which they belong. The Committee adopts this definition and extends it to include the concept of focal species. These are species that fulfill

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[2] How the revised forest plan will utilize focal species to conserve and recover "at risk" species is uncertain, because the USDA states that "Focal species are not intended to be a proxy for other species…" and "Focal species are not surrogates for the status of other species."

[3] Unfortunately, we cannot find the Agency definition of "at risk species." However, in some places it suggests those listed under the Endangered Species Act (ESA) or those Proposed or Candidate species for listing under the ESA, as well as Species of Conservation Concern.

the indicator criterion and provide specific insights into the biological diversity of the ecological system at different scales.

The USDA does state that there must be more than mere measurement of vegetative conditions—that a set of ecological conditions must be monitored:

> Respondents felt that monitoring habitat conditions only, specifically related to vegetation composition and structure, will not adequately address the reasons why species may or may not occupy those habitats; and that there may be other stressors unrelated to habitat that make suitable habitat conditions unsuitable for occupation by a particular species. The final rule requires monitoring the status of select ecological conditions. The concept of ecological conditions as defined in the proposed rule and the final rule includes more than vegetation composition and structure…
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> Those ecological conditions "encompass (vegetation composition and structure) as others, including stressors that are relevant to species and ecological integrity. Examples of ecological conditions include the abundance and distribution of aquatic and terrestrial habitats, connectivity, roads and other structural developments, human uses, and invasive species.

USDA also stated:

> The concept of focal species is well supported in the scientific literature and community. … The inclusion of the focal species (§ 219.19) in the monitoring section is based on concepts from the March 15, 1999, Committee of Scientists report, which recommended focal species as an approach to monitor and assess species viability.

Here is an example of the NFMA Rule ignoring its own best available science. Whereas "population trend monitoring is not required by the final rule", the Committee of Scientists (1999) report disagrees. They state:

> Habitat alone cannot be used to predict wildlife populations, however. The presence of suitable habitat does not ensure that any particular species will be present or will reproduce. Therefore, populations of species must also be assessed and continually monitored.

Yet monitoring ecological conditions for focal species—habitat—is precisely what the NMFA Rule says is all that's required. The Committee of Scientists (1999) states:

> An emphasis on focal species, including their functional importance or their role in the conservation of other species, combines aspects of single-species and ecosystem management. It also leads to considering species directly, in recognition that **focusing only on composition, structure, and processes may miss some components of biological diversity**.

(Emphasis added.) Regarding how to go about choosing focal species, USDA states:

> In some circumstances, a threatened, endangered, proposed, or candidate species, or a species of conservation concern may be the most appropriate focal species for assessing the ecological conditions required by § 219.9.
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> The Committee of Scientists report said focal species may be indicator species, keystone species, ecological engineers, umbrella species, link species, or species of concern. Agency directives will provide guidance for considering the selection of a focal species from these or other categories. Criteria for selection may include: the number and extent of relevant ecosystems in the plan area; the primary threats or stressors to those ecosystems, especially those related to predominant management activities on the plan area; the sensitivity of the species to changing conditions or their utility in confirming the existence of desired ecological conditions; the broad monitoring questions to be answered; factors that may limit viability of species; and others.

We note that as of this date, the Forest Service has not finalized the agency directives that are to "provide guidance for considering the selection of a focal species…"

The Committee of Scientists (1999) report suggests a pool of potential focal species:

> The key characteristic of a focal species is that its status and time trend provide insights to the integrity of the larger ecological system. The term "focal" includes several existing categories of species used to assess ecological integrity:
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> 1) Indicator species: species selected because their status is believed to (1) be indicative of the status of a larger functional group of species, (2) be reflective of the status of a key habitat type; or (3) act as an early warning of an anticipated stressor to ecological integrity. The presence of fish in a river is an indicator of water quality.
> 2) Keystone species: species whose effects on one or more critical ecological processes or on biological diversity are much greater than would be predicted from their abundance or biomass (e.g., the red-cockaded woodpecker creates cavities in living trees that provide shelter for 23 other species).
> 3) Ecological engineers: species who, by altering the habitat to their own needs, modify the availability of energy (food, water, or sunlight) and affect the fates and opportunities of other species (e.g., the beaver).
> 4) Umbrella species: species who, because of their large area requirements or use of multiple habitats encompass the habitat requirements of many other species (e.g., deer).
> 5) Link species: species that play critical roles in the transfer of matter and energy across trophic levels or provide a critical link for energy transfer in complex food webs. For example, prairie dogs in grassland ecosystems efficiently convert primary plant productivity into animal biomass. Prairie dog biomass, in turn, supports a diverse predator community.
> 6) Species of concern: species that may not satisfy the requirement of providing information to the larger ecosystem but because of public interest will also be monitored and assessed for viability. Such species include some threatened and endangered species, game species, sensitive species, and those that are vulnerable because they are rare.

At some point the Forest Service must, by law, craft a set of **indicators to monitor for ecological integrity** on the Nez Perce-Clearwater National Forests, based upon the best scientific information available. How focal species fit into that requirement remains to be seen. We suggest that the Forest Service start with the lists of SCC and Threatened, Endangered, Proposed, and Candidate species. We also suggest the revised forest plan include others whose habitats are not represented by those. An example of such a species is the black-backed woodpecker, not included as a recommended species in the SCC Assessment. The Boise National Forest adopted this species as an indicator species in its revised forest plan in 2010:

> The black-backed woodpecker depends on fire landscapes and other large- scale forest disturbances (Caton 1996; Goggans et al. 1988; Hoffman 1997; Hutto 1995; Marshall 1992; Saab and Dudley 1998). It is an irruptive species, opportunistically foraging on outbreaks of wood-boring beetles following drastic changes in forest structure and composition resulting from fires or uncharacteristically high density forests (Baldwin 1968; Blackford 1955; Dixon and Saab 2000; Goggans et al.1988; Lester 1980). Dense, unburned, old forest with high levels of snags and logs are also important habitat for this species, particularly for managing habitat over time in a well-distributed manner. These areas provide places for low levels of breeding birds but also provide opportunity for future disturbances, such as wildfire or insect and disease outbreaks (Dixon and Saab 2000; Hoyt and Hannon 2002; Hutto and Hanson 2009; Tremblay et al. 2009). Habitat that supports this species' persistence benefits other species dependent on forest systems that develop with fire and insect and disease disturbance processes. The black-backed woodpecker is a secondary consumer of terrestrial invertebrates and a primary cavity nester. Population levels of black-backed woodpeckers are often synchronous with insect outbreaks, and targeted feeding by this species can control or depress such outbreaks (O'Neil et al. 2001). The species physically fragments

> standing and logs by its foraging and nesting behavior (Marcot 1997; O'Neil et al. 2001). These KEFs influence habitat elements used by other species in the ecosystem. Important habitat elements (KECs) of this species are an association with medium size snags and live trees with heart rot. Fire can also benefit this species by stimulating outbreaks of bark beetle, an important food source. Black-backed woodpecker populations typically peak in the first 3–5 years after a fire. This species' restricted diet renders it vulnerable to the effects of fire suppression and to post-fire salvage logging in its habitat (Dixon and Saab 2000).
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> … Black-backed woodpeckers are proposed as an MIS because of their association with high numbers of snags in disturbed forests, use of late-seral old forest conditions, and relationship with beetle outbreaks in the years immediately following fire or insect or disease outbreaks. Management activities, such as salvage logging, timber harvest, and firewood collection, can affect KEFs this species performs or KECs associated with this species, and therefore **its role as an MIS would allow the Forest to monitor and evaluate the effects of management activities on identified forest communities and wildlife species.**

(Emphasis added.) Although somehow different in concept from focal species, management indicator species as the Boise National Forest utilizes it is functionally indistinguishable from focal species under the NFMA Rule.

We return now to commenting on content that **is** found in the SCC Assessment. We note that that so much of the SCC Assessment closely mimics Wisdom et al. (2000) in identifying issues and suggesting conservation strategies for the SCC, while also citing other scientific sources. We also note that one huge detail was, might we say, "lost in translation" from Wisdom et al. (2000) to the SCC Assessment. From the Abstract:

> Our analysis also indicated **that >70 percent of the 91 species are affected negatively by one or more factors associated with roads.** Moreover, maps of the abundance of source habitats in relation to classes of road density suggested that road-associated factors hypothetically may reduce the potential to support persistent populations of terrestrial carnivores in many subbasins. Management implications of our summarized road effects include the potential to mitigate a diverse set of negative factors associated with roads. **Comprehensive mitigation of road-associated factors would require a substantial reduction in the density of existing roads as well as effective control of road access in relation to management of livestock, timber, recreation, hunting, trapping, mineral development, and other human activities.**

(Emphases added.) And from Major Findings and Implications:

> **Efforts to restore habitats without simultaneous efforts to reduce road density and control human disturbances will curtail the effectiveness of habitat restoration, or even contribute to its failure; this is because of the large number of species that are simultaneously affected by decline in habitat as well as by road-associated factors.**

(Emphasis added.) The SCC Assessment's heavy bias toward identifying habitat manipulation options (i.e., logging and other active management activities) while lacking the Wisdom et al. (2000) implications for road management has led to a Proposed Action that is indeed a recipe for failure.

One other bias that is subtle but has profound implications for long-term ecological integrity involves wildland fire and fire suppression. We take the Lewis' woodpecker as one of what could be many examples. Wisdom et al., 2000 (and therefore the SCC Assessment) contains such statements as:

> Continue a strategy of wildfire suppression of stand-replacing fires except where such fires would benefit habitat for Lewis' woodpecker under the conditions specified in issue no. 4. Use prescribed fire, timber harvest, and thinning to change forest composition and structure to reduce risk of stand-replacing wildfires and shift to maintenance with prescribed underburn fires.

Some of the bias seems to be from Wisdom et al. (2000) itself,[4] but the bias is also taken further in the SCC Assessment. It states:

> Stand-replacing fires appear to create highly productive source habitats (Tobalske 1997). …The Lewis' woodpecker is closely associated with recent burns and responds favorably to stand-replacing fires (Tobalske 1997)…

(18-26.) A subtle but profound difference is by contrasting the SCC Assessment cite of Tobalske, 1997 with Anderson, 2003 (not cited) who states:

> **Fire suppression also is detrimental to these birds.** Evidence suggests that large-scale burned forests may play a critical role in creating ephemeral habitats for Lewis's woodpeckers because burns create favorable habitat aspects including: snags, open space for foraging maneuvers, ground cover and associated arthropod prey, and reduced numbers of nest predators (Saab and Vierling 2001).

(Emphasis added.) Wisdom et al. (2000) does recommend for the black-backed woodpecker: "Allow wildfires to burn in some forests with high fire risk to produce stand-replacing conditions, and avoid postfire salvage logging in portions of large burned forests for about 5 yr postfire."

Also, the SCC Assessment states: "However, research indicates that openings in **partially logged**, burned forests likely provide greater opportunities for aerial foraging (Saab and Dudley 1998)." (Emphasis added.) We could find no such statement endorsing partial logging in Saab and Dudley, 1998.

In identifying issues and suggesting conservation strategies for Group 2,[5] the SCC Assessment states:

> The following potential conservation strategies were suggested for the long-term persistence of Lewis' woodpecker (Blair and Servheen 1995, Wisdom et al. 2000):
>
> - Continue a strategy of wildfire suppression of stand-replacing fires except where such fires would benefit habitat for Lewis' woodpecker. Use prescribed fire, timber harvest, and thinning to change forest composition and structure to reduce risk of stand-replacing wildfires and shift to maintenance with prescribed underburn fires.

However, Blair and Servheen, 1995 is a scientific paper about the white-headed woodpecker—**not the Lewis' woodpecker** and unsurprisingly, the paper makes no such recommendation for continuing fire suppression to conserve Lewis' woodpecker habitat.

Given the absolute necessity of large reductions in road densities across these two forests as indicated by Wisdom et al. (2000), the acceptance of wildland fire where suppression actions would be difficult or prohibitively expensive because of reduced access needs to be woven into both the Assessment and the revised forest plan.

In sum, Friends of the Clearwater's review of the SCC Assessment for terrestrial species reveals the following shortcomings:

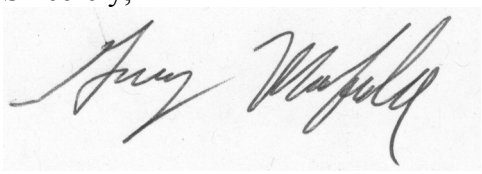
- The SCC Assessment does not clearly state what is considered to be the best available scientific information,
- The SCC Assessment does not always properly utilize the best available scientific information where it is identified,
- The SCC Assessment is confusing as to how the best available scientific information was used to inform the SCC Assessment, and;

[4] We make this point **not** to suggest that Wisdom et al. (2000) be omitted from best available science.
[5] Group 2, which Wisdom et al., 2000 include Lewis' Woodpecker as a member.

- The SCC Assessment omits important scientific information that rightly should be included as best available science.
- The SCC Assessment does not state how to address other scientific information that conflicts, contradicts, or disagrees with the science it considers "best available" when such information is submitted by the public or other agencies.
- The SCC Assessment fails to adequately incorporate the known ecological impacts of roads.
- The SCC Assessment shows bias against the restorative and necessary process of the full range of severities and extent of natural fire on the landscape.

We urge the Nez Perce-Clearwater National Forests to address these shortcomings in its next version of the Species of Conservation Concern component of the Forest Plan Assessment.

Sincerely,



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