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Josh Milligan
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Salmon-Challis NF
1206 S. Challis Street
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June 20, 2018

Re: SCNF Proposed Species of Conservation Concern List

Dear Mr. Milligan,

We appreciate the opportunity to review the Salmon-Challis National Forest proposed Species of Conservation Concern (SCC) list and provide feedback. Our groups are particularly interested in the intersection of the final SCC list and the development of management direction within the revised plan for maintaining viable populations of these species across their range and within the planning area.

We realize the "Sensitive Species" designation no longer exists under the current (2012) planning direction that is guiding the SCNF plan revision process. However, as a new element under the 2012 Planning Rule, the SCC list is meant in essence to "replace the Regional Forester's list of sensitive species" (U.S. Forest Service Pacific Southwest Region; July 2015). And while the process and criteria for SCC and Sensitive Species designation are not identical, the objective remains the same: To ensure that USFS managers identify species that need protection and then provide conditions that maintain viable wildlife populations within and throughout USFS planning areas. Just because the Sensitive Species designation goes away under the new planning rule does not mean that the FS gets to shirk this obligation. Sensitive Species should therefore become a SCC in revised Forest plans. Our species-specific comments are included below.

We look forward to working with the Salmon-Challis during the Forest Plan revision process. Thank you for your time and dedication to this effort.

Sincerely,



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Bighorn Sheep

Bighorn sheep were designated as a USFS Sensitive Species in Region 4 nearly 10 years ago. As such, bighorn sheep are subject to agency management direction to insure that actions by the Forest Service do not contribute to bighorn declines and do not lead to listing under the Endangered Species Act.

The facts and science that supported Sensitive Species designation have not changed. Bighorn populations continue to struggle in Idaho, largely due to diseases contracted from domestic sheep and goats.

Archeological evidence and reports by early explorers indicate that bighorn sheep were widely distributed and abundant in Idaho until the late 1800s. Drastic population declines from unregulated hunting, competition with livestock for forage, and disease occurred. By 1920 Idaho populations were estimated at 1000 animals, mostly within the Salmon River watershed. Strict hunting regulations, habitat protection and reintroduction built bighorn populations back to about 5000 animals by 1990. However, starting in the latter 1980s and continuing through the 1990s, disease from domestic sheep reduced bighorn numbers to about 2900 today (Bighorn Sheep Management Plan 2010, IDFG).

There is no doubt that there remains “substantial concern about (bighorns’) ability to persist over the long-term in the planning area,” thus justifying bighorns listing as a SCC. Disease outbreaks continue to threaten bighorn populations in Idaho and in this specific planning area. Because the threat to bighorns is not particularly over usual concerns such as habitat or forage, but rather disease, there is a need for “additional, species-specific plan components including standards and guidelines” that specifically deal with protecting bighorns from disease outbreaks caused by contact with domestic sheep and goats.

It has been suggested that management actions in the forest plan will deal with bighorn sheep and that listing as SCC is not needed because of promised subsequent management plan direction. SCC listing should not be contingent on existing plan standards or guidelines nor proposed plan components. Future (unknown) management actions are not listed anywhere in FSH 1909.12.52 as a reason to NOT list a species as a SCC. Rather, the decision must be based on whether or not there is, again, “substantial concern about the species’ capability to persist over the long term in the planning area.” FSH 1902.12.52c includes criteria for SCC identification, including “the best available scientific information about the species indicates substantial concerns about the species’

capability to persist over the long term in the planning area.” There are decades of research concluding that bighorns remain at risk throughout the Western United States, including Idaho, from diseases carried by domestic sheep. The concern over bighorn’s capability to persist over the long term in this planning area is unquestionable.

FSH 1902.12.52d directs that species should be considered for SCC listing for “(s)pecies for which the best available scientific information indicates there is local conservation concern about the species’ capability to persist over the long-term in the planning area due to... significant threats, caused by stressors on and off the plan area, to populations... declining trends in populations...in the plan area... low population numbers.”

Bighorns fit these criteria. The 2010 IDFG Bighorn Management Plan states, for the Lost River Range bighorn population, populations increased until the early 1980s but by 1992 the population suffered the same decline and persistent low recruitment as other bighorn sheep populations in the region. Augmentation with bighorns from Montana led to a population growth, the IDFG plan acknowledges that risk of contact with diseased domestic sheep remains an issue. Risk of contact with domestics remains an issue with the East Fork Salmon River bighorn population and IDFG states the population is still disease-limited as evidenced by very low lamb:ewe ratios since the die-off in the early 1990s. IDFG documents a risk of contact between bighorns and domestics in the South Lemhi Range. A “relatively high” risk of contact with domestic sheep and goats is documented by IDFG for the North Lemhi Range bighorn population. Bighorns are at risk of contact with domestic sheep in the South Beaverhead Range. The risk of contact with domestic sheep is noted for the North Beaverhead Range bighorn population, with the added concern that the Beaverhead Range forms a potential travel corridor between the Yellowstone Ecosystem and ecosystems farther north and west. With the threat of disease contact in this area, this potential travel corridor could lead to the spread of disease among bighorn subpopulations.

As late as 2016, the region 4 regional office recommended that bighorn be included on SCC lists.

In summary, the risk of disease from domestic sheep is an on-going concern for bighorn populations in several key landscapes of the planning area. This risk of disease transmission and subsequent die off episodes in bighorn populations demonstrates that there is “substantial concern about the species’ capability to persist over the long-term in the plan area.” If the persistence of these species cannot be maintained through the application of general standards and guidelines relating to ecosystem diversity and

integrity, “then additional, species-specific plan components, including standards or guidelines, must be included in the plan to provide such ecological conditions in the plan area.” These two key considerations for SCC listing clearly apply to bighorns in the planning area. Bighorns should be listed as SCC upfront in the planning process.

Grizzly Bear

The grizzly bear was listed as a threatened species in the contiguous lower 48 states under the U.S. Endangered Species Act (ESA) (40 Fed. Reg. 31,734 (July 28, 1975)), and should be recovered and managed as a large well-connected Northern Rockies metapopulation. The Greater Yellowstone grizzly bear population has recently been delisted from the Endangered Species Act list and as such, the Salmon-Challis should assess this species during this process and add grizzly to the SCC list.

Historic evidence supports the existence of a true metapopulation structure for grizzly bears in the contiguous United States (Craighead and Vyse 1996) including connectivity between the Greater Yellowstone Ecosystem (GYE) and the Northern Continental Divide Ecosystem (NCDE) (Picton 1986, Merriam 1922). As stated by the Service themselves, the goal for grizzly bear recovery is to “achiev[e] connectivity and manag[e] grizzly bear populations in the northern Rockies as subpopulations of a metapopulation” (2011 Grizzly Bear 5-Year Review, p.14). However, the GYE Final Delisting Rule and 2016 Conservation Strategy (CS) failed to consider the lack of connectivity as a threat to the GYE grizzly bear population as well as to other recovery areas. The delisting is currently being challenged in the courts.

The Salmon-Challis National Forest offers high-quality potential habitat and connective habitat for grizzly bears between the Greater Yellowstone population, Idaho Panhandle population and the Northern Continental Divide ecosystem population. The USFWS determination to remove the GYE population of grizzly bears from the federal list of endangered and threatened wildlife is not a surrogate for a National Forest Management Act (NFMA) determination of absence of concern within the planning area. In fact, the 2012 Planning rule (p. 36) states that species in the following categories must be considered for SCC designation (emphasis added):

a. Species with status ranks of G/T1 or G/T2 on the NatureServe ranking system. *Note:* Species with NatureServe G/T1 or G/T2 status ranks are expected to be included unless it can be demonstrated and documented that known threats for these species, such as those threats listed for the species by NatureServe, are not currently present or relevant in the plan area.

b. Species that were removed within the past 5 years from the Federal list of threatened or endangered species, and other delisted species that the regulatory agency still monitors.

The current genetic isolation of the Yellowstone population, and the relatively limited occurrence of bears within their historic range in the lower 48 calls for additional caution and therefore protections. These factors should warrant designation and the accompanying protections as a “Species of Conservation Concern.” The SCNF must consider the ecological conditions necessary to maintain and contribute to grizzly bear populations that will “persist over the long term with sufficient distribution to be resilient and adaptable to stressors and likely future environments” (36 CFR 219.19). The SCNF should seek to minimize management activities that conflict with, or result in the incidental take of threatened and endangered, management indicator, SCCs or otherwise iconic species, especially in critical and suitable habitat or high potential connectivity areas.

Gray wolf

The Salmon-Challis National Forest provides known species inhabitation and suitable habitat for the gray wolf, a Regional Forester Sensitive Species. The long-term future of the gray wolf in Idaho is far from secure, given the management policies implemented to date by the Idaho Fish and Game Department. It is important for the Salmon-Challis National Forest to pay close attention to habitat management for the gray wolf, particularly in light of the fact that this forest provides critical landscape linkages that connect the gray wolf population in Greater Yellowstone to Central Idaho. This linkage is critical to the long-term survival of Idaho’s gray wolf population as well as the genetic diversity of the larger gray wolf population in the Northern Rockies. Given this, the gray wolf should be added to the SCC list for the Salmon-Challis National Forest.

Northern Goshawk

The Salmon-Challis National Forest provides suitable habitat and has known occurrences of the northern goshawk, a Regional Forester Sensitive Species. The SCC assessment for this species states: “*Northern goshawks generally nest in mature or old- growth forests with large trees, high canopy closure, sparse ground cover, and open understories.*” We believe that it is imperative for the Forest to prioritize the retention of this forest type to ensure persistence overtime of northern goshawk. Large, stand

replacing fires are a direct threat to northern goshawk habitat and given the occurrence of these types of fires on the Forest, we believe there is significant threat to viable northern goshawk habitat. As such, this species should be included on the SCC list.

Great Gray Owl

The Salmon-Challis National Forest provides known habitat for the great gray owl, a Regional Forester Sensitive Species. The Salmon-Challis SCC report concludes “*there is not adequate evidence at this time to indicate a substantial concern for the capability of the great gray owl to persist over the long term on the SCNF*” However, we believe that the threat to suitable great gray habitat on the SCNF provides enough evidence to conclude concern for long term persistence of this species. The Forest notes the notoriously difficult nature of surveying for great gray owl. Given this, either modeling or assessment of habitat can be used as a predictor of potential species presence. The best available science demonstrates that there has been a decline in suitable habitat for this species as evidenced by the decline in habitat for subalpine conifer species. Increased frequency, intensity and size of forest fires on the Salmon-Challis are yet other factors impacting the availability of nesting habitat for this species. Given that the Idaho State Wildlife Action Plan reports a medium level of threat to the great gray owl in Idaho and the species shows up on the Regional Forester’s sensitive species list, we believe the great gray owl should be included on the SCC list.

Mountain Goat

The Salmon-Challis National Forest SCC assessment concludes that the planning area constitutes the “*southern extent of (mountain goat) range in the Rocky Mountains.*” The Forest Service needs to consider the importance of these populations relative to sustaining gene flow particularly related to climate adaptability and viability of this species. Parks et al 2015¹ concluded that populations that exist at the southern ranges of suitable habitat are integral to bolstering adaptive potential in the broader population. Accessing populations via local gene flow may be insufficient to counterbalance the genetic consequences at a broader population level, and as such it is imperative that the Forest consider how the planning area overall may limit (now and overtime) landscape level gene flow when making a SCC determination. We point out that §12.52(f)(1) recognizes that SCC identification may be warranted by “stressors on and off the plan

¹ Parks et al, 2015. *Landscape-level analysis of mountain goat population connectivity in Washington and southern*

area.” We believe that climate fluctuations may very well be a stressor on the overall genetic diversity of mountain goats, making southern anchor populations such as these all that much more critical for future survival. Further, the mountain goat is designated by the state of Idaho as a Species of Greatest Conservation Need (SGCN) and as such, Idaho Fish and Game conservatively manages hunting of mountain goat in the planning area. Given the statewide conservation, genetic relevance and aesthetical importance of this species, we recommend the Forest adding Mountain goat to the SCC list.

Westslope Cutthroat Trout

Reduction in suitable habitat, fragmentation of current habitat and loss of genetic diversity from hybridization with rainbow trout has resulted in a decline of this species from their historical levels in Idaho. This species is listed by the BLM as a Type 2 sensitive species and occurs on the USFS region 4 sensitive species list. While the SCC assessment concludes that westslope cutthroat trout are not at risk from hybridization because *“the majority of individuals genotyped in the Salmon River Basin were classified as pure westslope cutthroat trout and stocked fish are now sterilized,”* we note that the draft assessment report references the presence of hybridized cutthroat-rainbow trout across the planning area. We are concerned that the SCC assessment did not fully consider the full threat of potential hybridization over time. Further, we believe that habitat quality and fragmentation have the potential to substantially impact this species ability to persist over the long term. The draft assessment report notes that 72% of perennial streams have departed from their natural range of variation, and that major stressors continue to be grazing and roads. Given this, we believe western cutthroat trout should be added to the SCC list.

All indications are that the relatively colder headwater streams on the Salmon-Challis National Forest are critical to the survival of cold water dependent species like cutthroat trout in the Northern Rockies. Lower elevation streams and rivers throughout the Columbia River Basin are warming, becoming unsuitable for species like cutthroat trout. The colder headwaters of the headwater streams on the Salmon-Challis will provide refugia for species like cutthroat trout as lower elevation watersheds warm and become unsuitable to sustain cutthroat populations. The future of headwater streams on areas like the Salmon-Challis National Forest will decide if species like the cutthroat trout persist in the United States.

North American Wolverine

The Salmon-Challis National Forest provides habitat for the North American wolverine and this species is viable in the planning area. Wolverine inhabitation occurs in low densities due to a large range requirement. As such, wolverines are difficult to study and monitor, thus habitat modeling is considered among the best available scientific information to indicate areas where wolverines are likely to occur.

Based on wolverine habitat models, 92.1 percent of the Salmon-Challis National Forest is predicted to be wolverine habitat. This totals 21.5 percent of all predicted wolverine habitat across Idaho, making it the most significant forest in providing national forest lands habitat for wolverines in the state (see table below from IDFG 2014).

Table 3. Summary of National Forest administered lands (USFS 2014) within Idaho by total area (km²), the area and proportion within modeled wolverine habitat, and the relative contribution of habitat within each forest to the overall predicted distribution in Idaho.

USFS Region	National Forest	National Forest Area (km ²)	Predicted Wolverine Habitat (km ²)	% of National Forest Predicted to be Wolverine Habitat	% of Predicted Wolverine Habitat in Idaho
1	Bitterroot National Forest ^a	1894.1	1782.5	94.1	2.4
4	Boise National Forest	10221.5	6793.7	66.5	8.8
4	Caribou-Targhee National Forest ^a	11176.4	8586.9	76.8	11.1
1	Idaho Panhandle National Forests ^a	11311.2	7074.6	62.5	8.4
1	Kootenai National Forest ^a	204.9	200.1	97.7	0.3
1	Nez Perce-Clearwater National Forest	16479.9	12734.9	77.3	16.5
4	Payette National Forest	9745.8	8168.6	83.8	10.5
4	Salmon-Challis National Forest	17787.8	16383.5	92.1	21.5
4	Sawtooth National Forest	8489.9	6455.7	76.0	8.3
6	Wallowa-Whitman National Forest ^a	595.4	293.7	49.3	0.4
Totals		87906.9	68474.3	78.0	88.0

^a National Forests spanning Idaho and an adjacent state (MT, OR, WA, WY).

(From IDFG 2014)

Wolverines are snow-obligates that require areas that maintain snowpack late into the spring. This is critical for denning and reproduction. Numerous studies support the conclusion that climate change is likely to negatively affect wolverine habitat (Gonzales et al. 2008; Brodie and Post 2010; McKelvey et al. 2011; Peacock 2011; Johnston et al. 2012; Northern Rockies Adaptation Partnership 2014). The best available scientific data indicates that effects from climate change are already underway throughout the wolverine's range in the Lower 48, including on the Salmon-Challis National Forest. Wolverines are and will continue to be negatively impacted by warming temperatures, reduced snowpack, and loss of habitat due to climate change.

Given the importance of the Salmon-Challis relative to overall suitable wolverine

habitat, we encourage the Salmon-Challis to place the North American Wolverine on the SCC list.