

July 8, 2023

RE: Animal Potential Species of Conservation Concern Comments

Please consider the following species as Potential Species of Conservation Concern.

Clark's Nutcracker (*Nucifraga columbiana*) should be listed because of its symbiotic relationship with the federally threatened whitebark pine. The Audubon Climate Change Report at [Clark's Nutcracker | The Audubon Birds & Climate Change Report](#) says that suitable climate space is forecast by Audubon's climate model to decrease by roughly equal amounts—around 70 percent—in both summer and winter, with only 16% of the current summer space remaining stable and 25% of winter space stable by 2080. Tied as this species is to the high western coniferous forests, it seems unlikely it will be able to adapt to any new shifting climate space. Montana and Idaho's State Wildlife Action Plans (SWAP) both list the Clark's Nutcracker as a species of greatest conservation need. Flathead National Forest has the Clark's Nutcracker as a Species of Conservation Concern (SCC).

Mountain Goat (*Oreamnos americanus*) an iconic species that best symbolize our wild alpine places, is listed on Idaho's State Wildlife Action Plan as a species of greatest conservation need. Mountain Goats naturally occur at relatively low densities, in part due to Alpine habitat, sparse forage resources, interspecific competition, and patchy habitat. Most populations exhibit low productivity because females do not reproduce until age 3–4, females typically give birth to 1 kid (rarely twins), and juveniles and yearlings have low survival, with falls being one cause. Herds on the Lolo are a native species and not introduced like most mountain goats east of the Continental Divide. Many of the populations are small and isolated demographically and genetically. Alpine habitat is limited and could become scarcer in the face of changing temperature and precipitation patterns and will likely affect the conservation of this species. Human encroachment into Mountain Goat habitat is a threat, particularly from road development, backcountry recreation, especially snowmobiles, and aircraft. It is possible that disease could also be impacting populations.

The western bumblebee (*Bombus occidentalis*) should be identified as a potential species of conservation concern for the Lolo National Forest. According to the Montana Field Guide it is ranked G3 and SNR. On March 16, 2016, the U.S. Fish and Wildlife Service published a notice in the Federal Register indicating that, "Based on our review of the petition and sources cited in the petition, we find that the petition presents substantial scientific or commercial information indicating that listing the western bumble bee (*Bombus occidentalis*) may be warranted". Completion of status review is expected in 2023.

The following 2 studies indicate the western bumblebee population is declining. These references from the National Academy of Sciences should be included in your best available scientific information.

PNAS February 14, 2023 | vol. 120 | no. 7

Climate, pesticides, and landcover drive declines of the western bumble bee

Neal M. Williams and Jeremy Hemberger

PNAS February 14, 2023 | vol. 120 | no. 5

Recent and future declines of a historically widespread pollinator linked to climate, land cover, and pesticides

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The Lolo National Forest has a participating agreement with Missoula County to develop and implement a methodology to conduct pollinator surveys which should be utilized to provide information on the western bumblebee's status.

Because of time constraints limiting my ability to adequately cover all species, I will end with asking a few questions about the selected species or lack of selected species.

Why was flammulated owl selected as a SCC on the Flathead NF, but not the Lolo?

There are many species, such as the northern goshawk, that are listed as species of greatest conservation need on the Montana SWAP, that are not included in the Lolo National Forest Potential Species of Conservation Concern List and Rationale. Were all these species considered at some point and given some rationale to not include them?

You have considered some of the bat species and have given rationale for not listing them. With white nose syndrome spreading across the country, will you reconsider these species as meriting SCC status.

Thank you for considering our comments. We look forward to interacting with you as we continue to create the new Forest Plan.

Sincerely,

Pat & Sharon Sweeney