



**File Code:** 1920

**Date:** September 26, 2024

Dear Objectors and Interested Persons:

As the objection reviewing officer for the Regional Forester's list of species of conservation concern for the Nez Perce-Clearwater National Forests, I am providing my final written response to species of conservation concern objections (36 Code of Federal Regulations (CFR) 219 Subpart B). Objections to the Nez Perce-Clearwater Land Management Plan and Environmental Impact Statement have been reviewed by Regional Forester Leanne Marten, and she will provide a separate written response to those objections.

The legal notice of the objection period for the Nez Perce-Clearwater Land Management Plan Revision and the Regional Forester's list of species of conservation concern was published on November 28, 2023, initiating a 60-day objection filing period. The objection filing period closed on January 29, 2024.

I conducted a review of the species of conservation concern objections in accordance with the pre-decisional administrative review process described at 36 CFR 219 subpart B. A review team, made up of Forest Service subject matter experts, reviewed your objections and proposed remedies. After the review team evaluated the planning record to ensure it complied with current laws, regulations, and policies, they provided me with recommendations for addressing any inconsistencies.

As part of the objection review process, I held an objection resolution meeting on May 7, 2024, with objectors and interested persons. I appreciate the attendance and engagement of everyone that was able to join that meeting. The information that was shared during the meeting improved my understanding of your concerns and requested remedies regarding species of conservation concern and helped inform my response.

The enclosed response includes a summary of the objections, an analysis of the planning record and conclusion of its adequacy in addressing the issues, and instructions that must be completed prior to the responsible official making a final decision on the Regional Forester's list of species of conservation concern. My response is also available on the Forest Plan Revision website at <https://www.fs.usda.gov/project/?project=44089>.

This written response is the final determination of the U.S. Department of Agriculture on the objections to the Regional Forester's list of species of conservation concern for the Nez Perce-Clearwater land management plan (36 CFR 219.57(b)(3)).



If you have questions regarding this objection response, please contact Elizabeth Wadsworth, Objection Review Coordinator, Washington Office Ecosystem Management Coordination, at [elizabeth.wadsworth@usda.gov](mailto:elizabeth.wadsworth@usda.gov).

Sincerely,

JACQUELINE  
EMANUEL

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Associate Deputy Chief, National Forest System

Enclosure

cc: Leanne Marten, Molly Ryan; Heath Perrine; Celie Meier; Timory Peel; Elizabeth Wadsworth; Christine Bradbury





Forest Service  
U.S. DEPARTMENT OF AGRICULTURE

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Northern Region

September 2024

# **Enclosure 1: Objection Response for the Nez Perce-Clearwater National Forest Regional Forester's Species of Conservation Concern List**



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# REGIONAL FORESTER'S SPECIES OF CONSERVATION CONCERN LIST FOR THE NEZ PERCE-CLEARWATER NATIONAL FORESTS

An independent review team made up of Forest Service specialists assisted me in the review and resolution of the objections to the Northern Region's Regional Forester's Species of Conservation Concern List for the Nez Perce-Clearwater National Forests. They reviewed the objection letters, identified five substantive issues related to species of conservation concern (SCC), and reviewed the planning record related to these issues. To facilitate the review and response, similar issues were grouped together. In some cases, the review resulted in my issuing instructions to the responsible official because the team found that the planning record did not adequately address the objector's issue. This final response to the objections provides a summary of the issues raised by the objectors and their requested remedies, as well as the review findings and any instructions. The Responsible Official for the SCC list must complete my instructions and determine whether plan components need to be updated for species of conservation concern before a final decision is issued on the revised Land Management Plan for the Nez Perce-Clearwater National Forests.

## Resolution Meeting

I held a resolution meeting related to objections on the list of Species of Conservation Concern on May 7, 2024 (per 36 CFR 219.57(a)), virtually via Microsoft Teams, which included a phone line for those without internet access. The meeting was well attended and productive. Objectors and interested persons participated virtually and the meeting was open to the public for observation. The meeting covered aspects of the SCC objection topics, with a focus on areas where I was seeking greater clarity.

The discussions at the meeting helped me better understand the issues as well as the remedies proposed by objectors and the discussion benefited from both the objectors and interested persons sharing their perspectives. I appreciate the time of all participants and the engagement we shared. The feedback received at the meeting provided additional context on the objection issues and has helped inform this written response, including my instructions to the Regional Forester.

## Objection Response Reading Guide

The following responses to the objections are organized into topic areas. Individual issues are addressed in the following format: name of the issue; objection summary; an assessment of the issue; a conclusion of findings based on the assessment; and any instructions to the Regional Forester which must be completed before signing the record of decision. Where applicable, similar issues have been combined into one response while preserving the context of the individual issues.

For ease of discussion throughout this document, the Nez Perce-Clearwater National Forests will be referred to as "the Forests". The Nez Perce-Clearwater National Forests Land Management Plan will be referred to as "the forest plan" or "the land management plan" depending on the context of the discussion.



All page numbers and plan components cited in this objections response refer to the forest plan, final environmental impact statement (EIS), and draft record of decision, and their associated appendices that were released on November 27, 2023, at the start of the objection period.

## **SPECIES OF CONSERVATION CONCERN ISSUE RESPONSE**

### **Species of Conservation Concern Determination for Clearwater Chinook Salmon and Coho Salmon**

#### **Objection Summary**

Objectors contend the regional forester's determination that spring/summer Chinook salmon and coho salmon are not native to the Clearwater River basin, and therefore ineligible for designation as an SCC is arbitrary, capricious, and contrary to the 2012 planning rule and Biden Administration policy.

Objectors maintain that Chinook salmon and coho salmon occurred historically in the Clearwater River subbasin, within the proposed plan area, and are therefore native to the Clearwater basin.

#### **Objector's Proposed Remedy**

The Forest Service should strike its "non-native" rationale for the spring/summer Chinook salmon and coho salmon and designate spring/summer Chinook salmon and coho salmon as SCC and evaluate whether current ecosystem-based plan components will maintain viable populations of the species.

#### **Response**

The criteria for identifying species of conservation concern are outlined in FSH 1909.12.10.12.52c. The species must be "native to, and known to occur in, the plan area" and "The best available scientific information about the species indicates substantial concern about the species' capability to persist over the long term in the plan area." 36 CFR 219.19 defines a "native species" as "An organism that was historically or is present in a particular ecosystem as a result of natural migratory or evolutionary processes; and not as a result of an accidental or deliberate introduction into that ecosystem."

Both spring/summer Chinook salmon and coho salmon in the Clearwater River basin are known to occur in the plan area; the crux of this issue is whether they are "native" to the plan area. Objectors contend that spring/summer Chinook salmon and coho salmon in the Clearwater River basin meet the operative definition of native because the species were historically present in the Clearwater River basin of the plan area before these species were extirpated.

The regional forester's rationale for not identifying Chinook salmon and coho salmon as species of conservation concern is summarized in the animal species evaluation spreadsheet. Both species were historically present but then extirpated before being reintroduced in the Clearwater River basin, and therefore were not considered native.

The final EIS and draft record of decision both include several sections that address the land management plan's consistency with the September 27th, 2023, Presidential Memorandum, "Restoring



Healthy and Abundant Salmon, Steelhead, and other Native Fish Populations in the Columbia River Basin" (88 FR 67617).

## **Conclusion**

Consistent with 36 CFR 219.3, the planning record shows the Regional Forester relied on the best available scientific information to make an informed decision regarding the nativity of Clearwater Spring and Summer Chinook salmon and the Coho salmon in the context of evolutionary processes. However, the regulatory definition of "native species" from 36 CFR § 219.19 does not distinguish between deliberate introduction of a non-native species and deliberate re-introduction of an extirpated native species.

The Nez Perce Tribe provided additional scientific information and indigenous knowledge regarding the historical presence of Chinook salmon and coho salmon in their objection and during discussions at the objection resolution meeting. This information should be evaluated in determining whether Chinook salmon and coho salmon meet the native criteria for listing as a species of conservation concern.

## **Instructions**

Reconsider the scientific information used in light of the additional indigenous knowledge provided by the NPT in their objections to determine if the spring/summer clearwater Chinook and Coho salmon should be identified as a species of conservation concern as they are a re-introduced extirpated native species.

## **Species of Conservation Concern Determination for Endangered Species Act Listed Fish Species**

### **Objection Summary**

Objectors disagree with the SCC listing determinations for Snake River spring/summer Chinook salmon and steelhead, noting that these species "were not extirpated from the Salmon River and tributaries to it like the Rapid River, which is within the Nez Perce-Clearwater National Forests boundary." Nor were steelhead "extirpated from either the Clearwater or Salmon Rivers."

### **Objectors' Proposed Remedies**

Designate Snake River spring/summer Chinook salmon and Snake River Basin steelhead as SCC.

### **Response**

The Snake River spring/summer Chinook salmon and Snake River Basin Steelhead are both listed as "threatened" under the Endangered Species Act (ESA) and the species' status is indicated in table 304 of the final EIS. These species are precluded from being SCC under 36 CFR 219.9(c). The 2012 planning rule directs that species with threatened, endangered, proposed, or candidate status under the ESA cannot, by definition, be SCC. This was explained to the public via a regional "species of conservation concern FAQs" document that was made available on the regional SCC webpage and is part of the planning record:





**“What are federally recognized species, and why can’t they be identified as species of conservation concern?** Federally recognized species are species that have been identified by the US Fish and Wildlife Service or National Marine Fisheries Service as threatened, endangered, proposed or candidate under the ESA. This group represents a separate category of “at risk” species and therefore, they cannot be identified as SCC per the Planning Rule at 36 CFR 219.9(c). The planning rule requires land management plans to provide ecological conditions that contribute to the recovery of threatened or endangered species and conserve proposed or candidate species. See each individual unit’s proposed plan for more information regarding plan components designed to support the recovery and conservation of these species” (p. 4).

## Conclusion

The regional forester’s exclusion of ESA-listed Snake River spring/summer Chinook salmon and Snake River Basin steelhead from being SCC demonstrates consistency with 36 CFR 219.9(c). The rationale for these exclusions is sufficiently documented in the planning record and there are no instructions associated with this issue.

## Concern with Science Used in SCC Determination for Aquatic Species

### Objection Summary

Objectors contend that aquatic and riparian habitat trends in the plan area warrant listing of ten additional aquatic species as SCC (Straight snowfly, Idaho snowfly, Lolo mayfly, a caddisfly (*Ecosmoecus schmidi*), shortface lanx, Cascades needelfly, Cordillera forestfly, coho salmon, redband trout, and westslope cutthroat trout).

Objectors allege that the regional forester’s conclusion that habitat conditions in the plan area have improved is arbitrary and capricious and contrary to the 2012 planning rule’s best available scientific information requirement.

### Objector’s Proposed Remedy

In each instance where the regional forester relied on a rationale of improving habitat trends, reconsider aquatic species for designation as SCC using the 2019 Watershed Assessment cited in the final EIS. Species that should be reconsidered for SCC designation include the Straight snowfly, Idaho snowfly, Lolo mayfly, a caddisfly (*Ecosmoecus schmidi*), shortface lanx, Cascades needelfly, Cordillera forestfly, coho salmon, redband trout, and westslope cutthroat trout.

### Response

The criteria for identifying SCC are outlined in FSH 1909.12.10.12.52c. The species must be “native to, and known to occur in, the plan area” and “the best available scientific information about the species indicates substantial concern about the species’ capability to persist over the long term in the plan area.” This issue concerns whether best available scientific information about these ten species indicates substantial concern. Though the directives provide a framework of various indicators to “consider,” it does not provide a definition of what “substantial” means. In the absence of a policy definition, the northern region has developed a *SCC identification process* rationale document that describes how the



Regional Forester determines if there is “substantial concern” about the species capability to persist over the long term within the planning area:

“The best available scientific information must indicate substantial concern about the species’ capability to persist over the long term in the plan area.

- i. In general, substantial concern is best demonstrated by some combination of a decreasing population (abundance or distribution), decreasing habitat, or significant threats, particularly when greater than expected under natural variation and the population in the plan area is very small. Other factors considered during this evaluation included abundance, geographic distribution, reproductive potential, dispersal capabilities, and other demographic and life history characteristics of the species that could influence long-term persistence in the plan area. This approach is based on best available scientific information in conjunction with professional expertise of Regional Office biologists.
- ii. Rarity alone typically is not considered a substantial concern unless accompanied by one or more of the three general conditions listed in (B)(i) immediately above, or there are other prominent circumstances leading to concern for long-term persistence in the plan area” (p. 4).

The planning record demonstrates that the regional forester’s process for determining “substantial concern” relies on evaluation of a *combination* of factors. A declining habitat trend on its own, unaccompanied by any of the other factors identified in the process document, would not be enough to be considered “substantial.”

The ten species highlighted in this objection are analyzed below in the context of the “substantial concern” determination process outlined in the regional forester’s process document:

- Coho salmon – the regional forester’s rationale for not identifying coho salmon as SCC was not based on information concerning habitat trends, but rather the determination that the species is not native in the plan area (see issue above). Therefore, the objector’s concerns regarding sources of information used to assess riparian habitat conditions in the plan area ultimately does not affect the SCC determination for this species.
- Straight snowfly, Idaho snowfly, Lolo mayfly, a caddisfly (*Ecosmoecus schmidi*), shortface lanx, and Cascades needlefly – The regional forester’s SCC process document states that species will not be identified as SCC if “insufficient scientific information is available to conclude that there is a substantial concern about the species’ capability to persist in the plan area over the long term. Lack of sufficient scientific information includes having limited inventory data resulting from low survey effort, lack of effective detection methods, or, in the case of purported population declines, lack of reasonably consistent monitoring methods among trend monitoring periods that would preclude meaningful comparison” (pp. 4-5). This rationale is consistent with FSH 1909.12.10.12.52c(2). The planning record shows these species were excluded because of insufficient scientific information to determine substantial concern (column K of the SCC evaluation spreadsheet). Therefore, the objector’s concerns regarding sources of information used to assess riparian habitat conditions in the plan area ultimately would not affect the SCC determinations for these species.
- Cordillera forestfly – Unlike the other aquatic invertebrates, the SCC evaluation for Cordillera forestfly found there is sufficient information about this species to determine if there is



substantial concern for its long-term persistence in the plan area. “Likely improving habitat trends on National Forest Lands” is one of the factors that is listed in the SCC evaluation spreadsheet for this species. However, the scientific information cited to reach this conclusion is from a broad-scale assessment. This could be problematic because habitat trends for potential SCC should be assessed at the scale of the plan area (FSH 1909.12.12.53(7)), not solely on broader trends across National Forest System lands. The objector’s concerns regarding sources considered as best available scientific information to infer trends in riparian habitat in the plan area is valid and could potentially affect the SCC determination for this species.

- Redband trout and westslope cutthroat trout – The “rationale for SCC determination” in column M of the SCC evaluation spreadsheet suggests that improving habitat trends are the sole basis for these two species not being listed as SCC. This is contrary to the regional forester’s process for determining “substantial concern,” which relies on evaluation of a *combination* of factors. Examining the full row of evaluation factors for this species shows that other factors were considered (e.g., the species are both widely distributed, and population trends in the plan area are stable), yet this is not reflected in the “rationale for SCC determination” column. Presumably, the non-habit factors also informed the determination for these species, and this should be included in the rationale. Additionally, the column on “best available scientific information” does not seem to encompass all the best available scientific information –for example, there is a study by Kennedy and Meyer (2015) referenced in the final EIS (pg. 470) that found stable or increasing population trends of westslope cutthroat trout in the plan area, but this is not listed in the best available scientific information column of the SCC evaluation spreadsheet. In addition, similar to Cordillera forestfly, the scientific information used to inform a conclusion of improving habitat trends could use further evaluation.

The overarching issue raised in this objection is whether Roper et al. (2019) and USDA (2018) meet the “relevant” component of best available scientific information for determining forest-wide riparian and aquatic habitat trends, versus the Aquatics Assessment (USDA 2019a). FSH 1909.12 Zero Code 07.12 states that for information to be considered relevant, “The information must pertain to the issues under consideration at spatial and temporal scales appropriate to the plan area and to a land management plan.” Roper et al. (2019) assesses stream habitat trends on Forest Service and Bureau of Land Management-managed lands across five states within the Interior Columbia River Basin. Likewise, United States Department of Agriculture (2018) assesses stream habitat trends at the scale of bull trout recovery units: the Mid-Columbia Recovery Unit spans portions of eastern Washington, northeast Oregon, and north-Central Idaho (figure 2 in USDA 2018) and the Upper Snake Recovery Unit includes central Idaho and eastern Oregon (figure 2 in USDA 2018). It is problematic to extrapolate these broad-scale studies to conclude “likely improving” habitat trends in the plan area as a sole source of information. Extrapolating these broad-scale studies to reach a conclusion of ‘likely improving’ habitat trends in the plan area should not be the sole source of information to inform the SCC determination. The Forest’s aquatics assessment (USDA 2019a) assesses trends at different hydrologic unit code scales within the plan area and is cited in the final EIS, but not identified as best available scientific information in the SCC evaluation spreadsheet.

## Conclusion

It is not clear from the planning record why the Forest’s aquatics assessment (USDA 2019a) was not included as best available scientific information in the SCC evaluation spreadsheet and why other



references were identified as the sole rationale (Roper et al. 2019; USDA 2018). Roper et al. (2019) and USDA (2018) analyzed habitat trends at much larger spatial scales than the plan area yet were used to infer trends in aquatic/riparian habitat in the plan area. This does not affect all aquatic species' SCC determinations because the regional forester did not rely on a rationale of improving habitat trends to exclude listing all aquatic species. Some species were excluded due to insufficient scientific information available about the species' status (Straight snowfly, Idaho snowfly, Lolo mayfly, a caddisfly (*Ecosmoecus schmidi*), shortface lanx, and Cascades needlefly), and others were excluded for not being native in the plan area (coho salmon).

However, Cordillera forestfly, redband trout, and westslope cutthroat trout should be reviewed to ensure there is sufficient scientific information to determine habitat trends are improving in the plan area.

## Instructions

Review the SCC determinations for Cordillera forestfly, redband trout, and westslope cutthroat trout to ensure they are informed by the best available scientific information and clearly document the rationale for the listing determination.

## SCC Determination for Mountain Goat

### Objection Summary

The objectors challenge the regional forester's decision to exclude mountain goats from the list of SCC for the Nez Perce-Clearwater National Forests. They believe that the rationale for omitting the mountain goat from the SCC list contradicts the rationale for including the mountain goat on the SCC list for the Lolo National Forest and ignores relevant scientific information and guidance from the FSH. Objectors contend that the Forest Service failed to include relevant information about the species' conservation status, threats, and management priorities, including information provided in the Idaho Mountain Goat Management Plan 2019-2024 and as a result, does not have management direction for mountain goat recovery goals.

Objectors also assert that the agency violated NEPA, National Forest Management Act, and the 2012 planning rule because the agency claimed that mountain goat populations in wilderness, recommended wilderness, or Idaho Roadless Rule areas would not be subjected to the same threats but did not provide best available scientific information to support this conclusion. Objectors argue that the forest plan increases threats to mountain goats because the plan includes over-snow vehicle use in mountain goat habitat, including expanding over snow vehicle use in the Hoodoo Roadless Area. Objectors are additionally concerned that there are not any road density or other habitat security standards to protect mountain goats in the land management plan.

### Objector's Proposed Remedy

- List mountain goats as a SCC for the Nez Perce-Clearwater National Forests and include the following updated plan direction:
  - Modify standards FW-STD-WL-02 and FW-STD-WL-03 to include mountain goats.
  - Include land management plan components to eliminate disturbance to mountain goat habitat during critical periods.



- Incorporate citations and information contained in literature presented in the SCC rationale for the Lolo National Forest.

## Response

The Regional Forester identifies species of conservation concern for the individual plan area. The evaluation of best available scientific information used to identify SCC for the Nez Perce-Clearwater National Forests is not necessarily the same as the evaluation for the Lolo National Forest.

The Lolo National Forest's rationale for including mountain goat on the SCC list states:

"All herds within the plan area have demonstrated or are suspected to have population declines. Populations within the plan area are small and isolated and likely have limited connectivity to other populations due to suitable habitat arrangements within the larger landscape. Although the specific cause of the population decline are unknown, multiple threats to the species exist within the plan area, and when coupled with the inherently small populations within the plan area indicate there is substantial concern for the species."

Some of these factors are restricted to the spatial scale and location of the Lolo National Forest plan area, and therefore do not apply to the Nez Perce-Clearwater National Forests (e.g., disjunct populations, or populations at their range edge in Montana; documented population declines in the plan area and throughout Montana). However, some threats are broader in spatial scale (e.g., human disturbance, climate change, and sensitivity to environmental stochasticity). For these broader threats, there are some inconsistencies between the Nez Perce-Clearwater National Forests and the Lolo National Forest species overview conclusions, even when drawing from the same information sources. The Lolo National Forest species overview for mountain goat states the following regarding anticipated effects of climate change:

"The species is expected to be largely negatively affected by climate change (Northern Wild Sheep and Goat Council 2022). Increasing summer temperatures can increase physiological costs to individuals while reducing forage productivity, with subsequent implications for recruitment and survival (White et al. 2011, White et al. 2020, Young et al. 2022, Northern Wild Sheep and Goat Council 2022). Ultimately, the area suitable for sustaining the species is expected to decline (White et al. 2020, Elsen and Tingley 2015), which due to the small population sizes typified by the species, may have additional effects if connectivity among populations is not enhanced (Young et al. 2022)."

The Nez Perce-Clearwater National Forests SCC evaluation for mountain goat also cites Northern Wild Sheep and Goat Council (2022) when discussing climate change effects, but concludes "Climate change may affect the species through physiological costs of increasing summer temperatures. *Warmer winter temperatures may benefit the species in some respects* but others such as rain-on-snow events may be detrimental (Northern Wild Sheep and Goat Council 2022)." It is not clear in the planning record how warmer winter temperatures may benefit mountain goats, and why such a different conclusion is drawn compared to the Lolo National Forest regarding anticipated effects of climate change on this species.

A similar example of potential inconsistency between the two Forests species overview conclusions is regarding the threat posed to the species by human disturbance. The Lolo National Forest species overview for mountain goat states:



“Compared to other ungulates, the species appears particularly sensitive to human disturbance (Mountain Goat Management Team 2010). Motorized and non-motorized recreation, as well as aerial vehicles, are well documented to affect the species, particularly during winter and kid rearing season, with impacts ranging from permanent or seasonal displace, to changes in behavior and productivity (Idaho Department of Fish and Game 2019, Mountain Goat Management Team 2010, Northern Wild Sheep and Goat Council 2020).”

While there appears to be conflicting assumptions about the role of “protected areas” (wilderness, roadless, etc.) and how that might influence the threats to mountain goats; the Nez Perce-Clearwater National Forests SCC evaluation for mountain goat states: “There is some concern about unauthorized snowmobile use in the Black Snow Population Management Unit (IDFG 2019), but this is unstudied. The area is not open to motorized over-snow use.” The Lolo National Forest’s species overview cites several sources of information regarding effects of motorized and non-motorized recreation on this species, which are absent from the Nez Perce-Clearwater National Forests SCC evaluation.

## Conclusion

The objector’s requested remedy regarding the use of best available scientific information is reasonable and is included as an instruction to ensure compliance with FSH 1909.12 Zero Code 07. The Forest should review sources of information referenced in the Lolo National Forest species overview to determine if these sources are relevant to the Nez Perce-Clearwater National Forests, ensure all referenced best available scientific information is correctly interpreted, and assess if this has any implications for the determination of “substantial concern.”

## Instructions

- Verify that best available scientific information is included in the species assessment for mountain goat and that the rationale supporting the determination follows clearly and logically from the information available in the species assessment.
- Clarify in the record of decision that the SCC process is specific to the plan area and the determination for any given species is not only based on threats common to all populations of the species but also on best available scientific information about the condition of the population within the plan area.

## General Disagreement with the List of SCC

### Objection Summary

Objectors requested an additional alternative be considered that would have included the following SCC species for the Nez Perce-Clearwater Forests: black-backed woodpecker, pine marten, goshawks, peregrine falcon, bald eagle, black swift, common loon, bog lemming, western toad, and ringneck snake.

### Objector’s Proposed Remedy

Expand the list of SCC to include black-backed woodpecker, pine marten, goshawks, peregrine falcon, bald eagle, black swift, common loon, bog lemming, western toad, and ringneck snake.



## **Response**

The Forests documented the process for identifying SCC in a letter from the Regional Forester dated November 2023. All of the species requested by objectors were evaluated and were not found to meet the requirements of a SCC for the Nez Perce-Clearwater National Forests. Rationale for this decision is contained in the SCC animal species evaluation spreadsheet. The objector did not provide any rationale or science to support how the requested species meet the requirements of a SCC.

## **Conclusion**

I find that there was not sufficient information presented by the objector to warrant consideration of the requested species as SCC. The regional forester documented the process that was used for the identification of SCC and there are no instructions related to this issue.



## OBJECTORS AND INTERESTED PERSONS

### Eligible Objectors

There were five objections to the Regional Forester's SCC list for the Nez Perce-Clearwater NF, filed by:

- Friends of Clearwater
- Great Burn Conservation Alliance
- Idaho Conservation League, Montana Wildlife Federation
- Idaho Governor's Office of Species of Conservation Concern
- Idaho Wildlife Federation
- Nez Perce Tribe
- Ninemile Wildlife Workgroup
- Wild Montana
- Winter Wildlands Alliance
- Kevin Proescholdt
- Mack Long
- Jonh Dunkum
- John Westenberg

### Interested Persons

There were four organizations who filed as interested persons for SCC issues:

- Nez Perce Tribe
- North American Packgoat Association
- Trout Unlimited
- Idaho Governor's Office of Species Conservation

## REFERENCES CITED

Acts (e.g., the National Forest Management Act) are available at the Office of the Law Revision Counsel's United States Code website at <https://uscode.house.gov/>.

CFR references are available at [www.ecfr.gov](http://www.ecfr.gov).

Forest Service manuals and handbooks are available at <https://www.fs.usda.gov/about-agency/regulations-policies>.

Forest plan revision documents (e.g., final EIS, forest plan assessment) are available at <https://www.fs.usda.gov/detail/nezperceclearwater/landmanagement/planning/?cid=stelprdb5447338>.

USDA. 2015. FSH 1909.12 – Land Management Planning Handbook. Available at <https://www.fs.usda.gov/about-agency/regulations-policies>.

USDA. 2015. FSH 1909.12 – Land Management Planning Handbook, Chapter 50 – Objection Process. Available at <https://www.fs.usda.gov/about-agency/regulations-policies>.

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