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Comments: See attached comments.

Comments on Lolo NF plan revision: Species of Conservation Concern

General Comments

It is not clear whether the prior (2009) Memorandum of Understanding between the U.S. Forest Service and U.S. Fish and Wildlife Service "to promote the conservation of migratory birds" is still in place. An addendum to that MOU dated 21 April 2016 indicates that the agencies were working together to consider revisions, but as best as I can tell, the original MOU is in place. If so, the Forest Service should be giving explicit consideration to the Fish and Wildlife Service's "Birds of Conservation Concern" (BCC) as it identifies Species of Conservation Concern for purposes of the Lolo N.F. plan revision. Here is the citation:

U.S. Fish and Wildlife Service. 2021. Birds of Conservation Concern 2021. United States Department of the Interior, U.S. Fish and Wildlife Service, Migratory Birds, Falls Church, Virginia.
<http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>

Regardless of the status of the USFS-USFWS MOU to promote the conservation of migratory birds, this document is a key resource which the Lolo National Forest should actively consider in its current assessment. The Fish and Wildlife Service lists 24 BCC species in the Northern Rockies Bird Conservation Region (#10), and many of these species are present in the Lolo N.F. In addition, half of the 24 BCC species in BCR #10 are also of concern at the continental level. Among species present in the Lolo N.F. that are listed in the BCC lists for BCR #10 and the entire continent are Black Swift, Calliope Hummingbird, Rufous Hummingbird, Long-eared Owl, Lewis's Woodpecker, Olive-sided Flycatcher, Evening Grosbeak, and Cassin's Finch. Additionally, Williamson's Sapsucker is on the BCC list for BCR #10.

Of the species mentioned above, Black Swift is a Level One Priority Species on the list of Montana Species of Concern and Lewis's Woodpecker is a Level Two Priority Species.

According to the Lolo N.F. Potential Species of Conservation Concern List and Rationale for Animals:

2. The best available scientific information must indicate substantial concern about the species' capability to persist over the long term in the plan area.
3. In general, substantial concern was best demonstrated by a decreasing population (abundance or distribution), decreasing habitat availability or suitability, or significant threats. Other potential factors considered included geographic distribution, reproductive potential, dispersal capabilities, and other demographic and life history characteristics that may influence long-term persistence in the plan area.
4. Rarity alone was not typically considered a substantial concern unless there were other prominent circumstances leading to concern for long-term persistence

of the species within the plan area.

5. If there was insufficient scientific information available to conclude that there is substantial concern about a species' capability to persist in the plan area over the long-term, or if the species was secure in the plan area, the species was not identified as a potential SCC. Rationale for not identifying a species as a potential SCC included:

a. The species was deemed secure within the plan area and the best available scientific information concerning trends in populations, habitats, and threats did not suggest substantial concern about continued long-term persistence within the plan area.

b. Available scientific information was insufficient to conclude if there was a substantial concern about the species' likelihood to persist in the plan area. Insufficient scientific information included 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.

I have a number of concerns about application of the criteria above:

* The absence of data does not necessarily indicate an absence of concern. Hence, a pre-cautionary approach is most appropriate, especially when there is evidence of widespread declines in a species' population and/or its habitat.

* Some species may be deemed "secure within the plan area," but over what time frame? When a forest plan may last for several decades, it is essential to take a long-term view of what is secure. Given the pace of environmental change, when all indications are that a species is in trouble today over a significant part of its range it is only prudent to acknowledge and work to mitigate those problems sooner rather than later.

* If a species' population appears to be stable within the Lolo N.F. but in trouble everywhere else, there is an added burden on Lolo N.F. to manage for the benefit of those populations. If indeed, the Lolo N.F. has today and can in the future maintain healthy populations, those populations may serve as critical sources to sustain species more widely.

* In several of the species accounts it is noted that there are no known population trend estimates for the species within the plan area, but elsewhere it is noted that the population appears to be stable within the plan area, where the species is regularly documented. I am guessing that the evidence that the species is "regularly documented" comes from eBird reports. Are you reviewing the status and trend analyses available via eBird? These analyses are highly instructive and present a more nuanced view of recent population distribution and trends than can be obtained from sources such as Breeding Bird Surveys. For example, consider these screen shots of eBird status and trend analyses for Olive-sided Flycatcher and Clark's Nutcracker:

Species Comments

Bald Eagle: The assessment indicates that "Continued population increases (rpi-

project.org, 05/2022), suggest that population recovery is sustainable nationally (Zimmerman et al. 2022), within Montana (Montana Bald Eagle Working Group 1986;1994;2010;2016), and thus within the plan area." Hence, this species is not proposed for SCC status. I agree with this conclusion, but for other species where all evidence points to widespread, long-term declines in population and/or habitat, the opposite conclusion is warranted.

Black-backed Woodpecker: Seems appropriate to not list as SCC.

Clark's Nutcracker: The noted declines in BCR #10 and beyond (see eBird trend analysis, which indicates widespread declines, 2007-2021), the high percentage of its population occurring within western Montana and the plan area, and its near obligate dependency on the precipitously declining whitebark pine are sufficient reasons to include this on the Lolo N.F. SCC list.

Common Loon: I am not sure where all this species is found in the Lolo N.F. but I have concern about management of human disturbance at places like Holland and Seeley Lakes.

Flammulated Owl: Seems appropriate to not list as SCC.

Harlequin Duck: Seems appropriate to list as SCC.

Lewis's Woodpecker: Note that the species is listed as a BCC species at the continental and BCR #10 scales by the Fish and Wildlife Service. However, the eBird status and trends analyses suggest recent increases across a wide area. I think one is a toss-up, but I do not disagree with the conclusion to not list as SCC.

Peregrine Falcon: I agree with the conclusion to not list as SCC, but special attention should be given to managing disturbance (e.g., by rock climbers) at or around known eyries.

Trumpeter Swan: I agree with the rationale for not listing as a SCC.

Given the above, I am most concerned about species for which I see no consideration given, including Black Swift, Calliope Hummingbird, Rufous Hummingbird, Long-eared Owl, Williamson's Sapsucker, Olive-sided Flycatcher, Evening Grosbeak, and Cassin's Finch. Please add these species to your list of SCC candidates and give them careful scrutiny.

Several of them are subject to clear, widespread declines and regularly occur in the Lolo N.F. I won't go through them one by one, but consider the eBird analysis, 2007-2021, below for Williamson's Sapsucker. There is not a single part of its range in the forested, Mountain West where this species isn't declining:

Thank you for considering my comments. I appreciate your draft assessment, but I encourage a more long-term view, more consideration of status and trends outside the plan area, and more consideration of the contribution the Lolo N.F. can make to species conservation beyond the forest boundaries. Finally, please take into account the Fish

and Wildlife Service's Birds of Conservation Concern list and the cutting edge tools for analysis of status and trends provided by the Cornell Lab of Ornithology via eBird.