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Comments: The proposed SCC list, especially for animals is perplexingly small. I could not find adequate justification for leaving a lot of the Montana Species of Concern off the SCC list for the Lolo NF. I asked, but never got a good answer as to how designated SCC species would be managed differently than other Montana designated Species of Concern. I did not have time to do an extensive review of all of the species that were evaluated for SCC. My comments here focus primarily on the northern bog lemming. I may submit comments on additional species separately.

Northern bog lemmings should be designated as a SCC.

The northern bog lemming was petitioned for listing in 2014, and the USFWS is currently compiling more information before issuing a decision on whether to propose listing or not.

Northern bog lemming populations are small and isolated, just like bighorn sheep. Their habitats are threatened by climate change. This species is likely temperature sensitive, dependent on cool, moist, mossy habitats. The evaluation states that riparian conditions have improved, but I cannot see any improvements in ecological conditions for the types of habitats occupied by northern bog lemmings on the Lolo. I would like to know some specific examples of this on the Lolo NF.

The fact that this species has been petitioned for listing is reason enough to show substantial concern for long-term persistence in the plan area. Please refer to the listing petition, available online for more detailed information on threats to this species. Some specific threats on the Lolo National Forest include livestock grazing, including stock (horses, mules) used for backcountry recreation that may graze in sensitive mossy wet meadows, road building, trail building, off-road vehicle use (legal and illegal) and snowmobiling (especially snowmobile play areas in fens such as Shoofly Meadows). Snowmobiling can negatively impact subnivian mammals such as the bog lemming by compacting the snow. The Lolo National Forest can play a key role to help with the persistence of this species through careful management of known and potential bog lemming sites.

The fact that northern bog lemmings are globally secure is not an appropriate justification for not putting bog lemmings on the SCC list. Bighorn sheep are also globally secure, and they were designated as SCC. Northern bog lemmings are not widely distributed in the plan area, and the statement that they are is incorrect. This species mainly just occupies a few very specific areas and habitats within the Lolo NF. Unlike bighorn sheep (which were designated as SCC) northern bog lemmings cannot be translocated to re-establish populations that have been lost. Their habitat is difficult to restore if degraded or lost. This all justifies extra care in managing this species and its habitats.

The scientific literature cited for the northern bog lemming is outdated relative to much more recent information on this species. There is more recent information being gathered and published. There will be a special symposium on northern bog lemmings at the national meetings of The Wildlife Society in November 2023. Please look for this new information, as well as updates from the USFWS.

It is uncertain when the USFWS will make a final determination on whether to list this species. In the meantime, the Lolo NF should do what it can to manage for the long-term persistence of this species. This would include:

- 1.Exclude snowmobiles from Shoofly Meadows and all adjacent sloped fens (known to be occupied by bog lemmings).
- 2.Recommend expansion of the Shoofly Meadows RNA to include the sloped fens to the west of the main wetland basin. (I understand this would need to be done through the Regional Office).
- 3.Finley Fen, located along the Finley Creek Road on former Plum Creek Timber land is a unique fen that is richer than most in this area. It has flow-through water, no sphagnum moss, and is dominated by true mosses, sedges, bog birch, other shrubs. It is a known northern bog lemming site. Keep out snowmobiles and other motorized use. No grazing, including livestock. A road adjacent to the fen has already been closed, please keep it closed. Evaluate this wetland for Research Natural Area designation. This fen is vulnerable as it is close to a road.
- 4.Exclude snowmobiles from all other fens. Conflict areas could easily be identified by a late-winter aerial survey

to look for snowmobile tracks in other large fens, such as the Sheep Mountain Bog in Gold Creek and the wetlands in upper Boles Creek (where bog lemmings have also been documented).

5. Prohibit livestock (horse) grazing in areas where trails run close to suitable fen habitat, whether or not bog lemmings have been documented there (such as fens along the trail into the Rattlesnake Wilderness from the Gold Creek side).

6. Follow recommendations by Marc Jones, developed to protect peatland habitats in the Kootenai NF. Jones, W. M. 2003. Kootenai National Forest peatlands: description and effects of forest management. Report to the Kootenai National Forest, Montana. Montana Natural Heritage Program, Helena. 14 pp. + appendices. <https://archive.org/details/1FAE4B9F-E3BA-4595-90B7-B4009CEFE75C>

7. Review carefully the information presented in the petition to list the northern bog lemming submitted in 2014: <http://wg.convio.net/site/DocServer/WildEarthGuardiansPetitionNorthernBogLemming.pdf?docID=14742>

8. Develop a better map of peatlands on the Lolo NF. The Montana Natural Heritage Program had plans to do so, but may or may not have completed it. Please coordinate with them on this.

9. Designate peatlands as a unique and rare habitat. See my more extensive comments on this.

10. New survey techniques are being used to document northern bog lemmings. Please keep up-to-date on this by coordinating closely with Montana FWP.