

Data Submitted (UTC 11): 1/29/2024 8:00:00 AM

First name: Hayley

Last name: Newman

Organization: Great Burn Conservation Alliance

Title:

Comments: Region One, Objection Review Officer

U.S. Forest Service

26 Fort Missoula Road Missoula, MT 59804

Re: Nez Perce-Clearwater List of Species of Conservation Concern Objection

Submitted electronically via: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=44089> January 29, 2024

Pursuant to 36 C.F.R. 219 Subpart B, Great Burn Study Group (dba Great Burn Conservation Alliance) submits this objection to the List of Species of Conservation Concern for the Nez Perce-Clearwater National Forest.

The Great Burn Conservation Alliance (GBCA) is a 52-year-old organization that works to foster the connection between people and place to further conservation and stewardship in the Great Burn ecosystem. Our mission area covers nearly 1.9 million acres, where we partner with the Nez Perce-Clearwater, Lolo, and Idaho Panhandle National Forests to maintain the wild character of the land.

Representatives of the GBCA were involved in RARE I and II, and in the first round of forest planning in the early 1980[rsquo]s. Since that time, GBCA directly participated in the Clearwater National Forests[rsquo] 2004 planning effort, stakeholder collaborative groups, and have submitted comments on the 2014 Proposed Action, 2018 Framework for Alternative Development and the 2020 Draft Environmental Impact Statement (DEIS).

GBCA is deeply committed to and invested in this region and its wildlife

Lead Objector

Hayley Newman

Executive Director, Great Burn Conservation Alliance 406-240-9901

hayley@greatburn.org

2825 Stockyard Road, Suite A7 Missoula, Montana 59808

Standing to Object

GBCA has commented on issues involving mountain goats and the NPCNF throughout the forest planning process. In the GBCA's comment letter on the proposed action dated Nov. 13, 2014, we requested that the mountain goat be included on the list of Species of Conservation Concern for the Species of Conservation Concern for the Nez Perce-Clearwater National Forest (NPCNF).¹ In the GBCA's comment letter on the DEIS dated April 20, 2020, we repeated this request, providing extensive literature references and site-specific information supporting this designation.² The Regional Forester's rationale for omitting the mountain goat from the NPCNF Species of Conservation Concern (SCC) list failed to respond to this scientific information and the requirements of the 2012 Planning Rule, and ignored relevant and up-to-date scientific information, as well as the explicit requirements of the Forest Service Handbook.³

The GBCA is actively involved in the Lolo National Forest (LNF) plan revision process, where we provided similar information regarding mountain goat habitat needs and threats and requested the mountain goat's designation as a Species of Conservation Concern. The Regional Forester's decision to include the mountain goat on the SCC list for the LNF directly responded to that information and reflected proper interpretation of the 2012 Planning Rule. The GBCA is committed to consistent and scientifically based habitat management across the Hoodoo Roadless Area, and is particularly concerned with reconciling this glaring inconsistency between SCC rationales for a species whose habitat transcends forest boundary lines and whose threats are not limited to either planning area. The consequences of omitting the mountain goat from the NPCNF SCC list and plan components will compromise the integrity of both the NPCNF and LNF LMP revisions, with particular impact on the mountain goats inhabiting the Hoodoo Roadless Area.

GBCA Objects to the Regional Forester's decision to not include mountain goat on the List of Species of Conservation Concern

Overview

The Regional Forester failed to list the mountain goat as a SCC in the LMP and FEIS. Although released within one month of each other for adjacent forests with overlapping mountain goat habitat, the Regional Forester's rationale for omitting the mountain goat from the NPCNF SCC list contradicts the rationale for including the mountain goat on the SCC list for the LNF and ignores relevant scientific information and guidance from the Forest Service Handbook.⁴ The Regional Forester's rationale for omitting the mountain goat from the NPCNF SCC list relies on an assumption that existing habitat in wilderness and roadless areas will be protected from the identified stressors of motorized recreation, yet the revised plan proposes removal of these protections by substantially reducing recommended wilderness and expanding winter motorized recreation in areas supporting mountain goat populations. The revised plan relies on this flawed rationale and thus fails to address mountain goat habitat needs in the [ldquo]fine filter[rdquo] level of analysis

1 Great Burn Study Group, Comment on the Nez Perce-Clearwater National Forests Proposed Action, Nov. 13, 2014, at 9. (Appendix A)

2 Great Burn Conservation Alliance, Idaho Conservation League, and The Wilderness Society, Draft Forest Plan and Environmental Impact Statement Comments, April 20, 2020, at 65-76. (Appendix B)

3 FSH 1909.12.52d(3)(d)

4 FSH 1909.12.52d(3)(d)

justified for this species, pursuant to the 2012 Planning Rule. The final environmental impact statement relies on this flawed rationale and thus inadequately analyzes the impacts of opening currently protected areas to winter motorized recreation, as well as other threats identified and documented in the SCC analysis released for the adjacent Lolo National Forest.

Basis for Objection

The Regional Forester failed to list the mountain goat as a SCC in the LMP and FEIS. Mountain goats should have been included on the NPCNF SCC list pursuant to the 2012 Planning Rule, 36 CFR Part 219, which sets out two relevant requirements. First, SCC must be designated. The rule defines SCC as “[a] species, other than federally recognized threatened, endangered, proposed, or candidate species, that is known to occur in the plan area and for which the regional forester has determined that the best available scientific information indicates substantial concern about the species’ capability to persist over the long-term in the plan area.”⁵ Second, a plan must include standards or guidelines to maintain or restore ecological conditions within the plan area to contribute to maintaining a viable population of the species within its range.⁶

The SCC lists for the NPCNF and adjacent LNF offer contradictory information regarding mountain goats. Although released within one month of each other for adjacent forests with overlapping mountain goat habitat, the Regional Forester’s rationale for omitting the mountain goat from the NPCNF SCC list contradicts the rationale for including the mountain goat on the SCC list for the LNF and ignores relevant scientific information and guidance from the Forest Service Handbook.⁷

On October 25, 2023, the Regional Forester released a memorandum⁸ summarizing selection of Species of Conservation Concern for the LNF, accompanied by a narrative rationale (species evaluations) used to select animal⁹ and plant species as SCC for the LNF’s revised land management plan. The rationale is explained in an executive summary¹⁰ as well. The Regional Forester noted that the threats facing mountain goats are not specific to the Lolo National Forest, but apply throughout the species’ distribution¹¹ These broadly applicable threats include:

[T]he tendency for populations to be small and isolated, as is the case within the plan area, which present concerns for genetic variability as well as susceptibility to stochastic events such as weather, predation, and pathogens.¹²

...

[M]ountain goats are susceptible to infection by *Mycoplasma ovipneumoniae* (Lowrey et al. 2018, Wolff et al. 2019), the bacterium associated with pneumonia in sheep and goats.¹³

...

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 displacement, 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).¹⁴

...

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).¹⁵

The Regional Forester concluded that there is sufficient scientific information available to determine if there is substantial concern for long-term persistence of the species in the plan area, and thus included the mountain goat on the SCC list for the LNF. The following statement summarizes the Regional Forester's rationale:

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.¹⁶

Yet, mountain goats were not included as a SCC for the NPCNF. On November 13, 2023, the Regional Forester released a memorandum¹⁷ summarizing selection of SCC for the NPCNF, accompanied by a rationale (species evaluations) used to select animal¹⁸ and plant species as SCC for the NPCNF LMP and FEIS. Although the mountain goat was considered for SCC status, the Regional Forester declined to include it on the list, concluding:

No substantial concern. Most habitat is in designated wilderness or Idaho roadless areas, removed from stressors associated with motorized use and vegetation management. Overhunting was identified as contributing to declines decades ago, but this stressor has been corrected. Although reliable population estimates are lacking, the most recent minimum counts in three of the plan area's PMUs appear to have sufficient abundance and

distribution to support long-term persistence.¹⁹

Although released by the same Regional Forester within a time span of just a few weeks, these rationales present opposite and inconsistent conclusions regarding the same species in a contiguous landscape. In particular, the plans reach contradictory conclusions regarding (1) the nature of threats from winter motorized recreation in the plan area and (2) population trends.

Threats to mountain goats posed by OSV use are treated differently in the two forests's SCC decisions. The LNF SCC rationale highlights threats from winter motorized recreation in the plan area. "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 displacement, to changes in behavior and productivity."²⁰ In contrast, the NPCNF SCC rationale accords less significance to motorized recreation. "There is some concern about unauthorized snowmobile use in the Black Snow PMU (IDFG 2019), but this is unstudied. The area is not open to motorized over-snow use."²¹ Importantly, this conclusion assumes that the Black Snow PMU will remain closed to winter motorized recreation, but that is not correct.

According to the Idaho Mountain Goat Management Plan, the "Black Snow PMU includes mountain goat habitat within GMUs 7, 9, 10, 10A, and 12."²² The Idaho Hunt Planner Map²³ clearly shows that GMU 10 includes mountain goat habitat between Kid Lake and Fish Lake that the NPCNF LMP proposes to eliminate from recommended wilderness. Thus, the statement in

the NPCNF SCC Rationale is incorrect and the conclusion it supports (that snowmobile use will not negatively impact mountain goats) is unfounded.

As with the threat of motorized recreation, population trends receive different treatments in the two forests's SCC Rationales. The Lolo Rationale emphasizes the decline in mountain goat populations. "Population surveys for the plan area are limited (Smith and DeCesare 2017); however, for the three monitored populations harvest trends suggest populations have declined since the 1970s, a pattern that is common for all native populations in Montana (Smith and DeCesare 2017). Surveys of area biologists further support the notion that native populations of the species are in decline throughout Montana, including the plan area (Smith and DeCesare 2017)."²⁴ In contrast, the NPCNF Rationale downplays any potential declines in population. "Reliable recent trend data does not exist for the plan area due to the methodology and frequency of surveys. However, there is some thought that goats may be decreasing in some parts of the plan area (particularly the Lower Salmon PMU) while stable or increasing in others (e.g., Black Snow and Seven Devils PMU)(IDFG 2021, 2022). The overall trend in the plan area is unknown."²⁵

Although these SCC rationales were prepared by the same Regional Forester for a species whose distribution spans adjacent national forests, the rationale for the NPCNF SCC list fails to reference relevant scientific information that the Regional Forester cited and relied upon in determining that the mountain goat would be listed as a SCC for the LNF. Specifically, the following sources are all cited in the LNF Rationale but are conspicuously absent from the NPCNF Rationale:

Bowyer, T.R., Bleich, V.C., Stewart, K.M., Whiting, J.C., and Monteith, K.L. 2014. Density dependence in ungulates: a review of causes, and concepts with some clarifications. *California Fish and Game* 100 (3): pp. 550-572 pp.

C[ocirc][acute], S.D., and Festa-Bianchet, M. 2003. Mountain goat. Chapter 49. In Feldhamer, G. A., Thompson, B.C. and Chapman, J. A., eds., *Wild mammals of North America: biology, management and conservation*. Second edition.

Baltimore, MD: John Hopkins University Press. 1061-1075 pp.

Elsen, P.R., and Tingley, M.W. 2015. Global mountain topography and the fate of montane species under climate change. *Nature Climate Change* 5 (8): 772-776 pp. <https://doi.org/10.1038/nclimate2656>

Festa-Bianchet, M., and Côté, S.D. 2012. *Mountain goats: ecology, behavior, and conservation of an alpine ungulate*. Island Press.

Grusing, E.C., Lowrey, B.H., DeVoe, J., and Garrott, R.A. 2020. Evaluating summer migrations to mineral licks by two mountain ungulates. 22nd Biennial Symposium of the Northern Wild Sheep and Goat Council.

Hamel, S., Côté, S.D., Smith, K.G., and Festa-Bianchet, M. 2006. Population Dynamics and Harvest Potential of Mountain Goat Herds in Alberta. *Journal of Wildlife Management* 70 (4): 1044-1053 pp.

10.2193/0022-541x(2006)70[1044:Pdahpo]2.0.Co;2

Houston, D.B., and Stevens, V. 1988. Resource limitation in mountain goats: a test by experimental cropping. *Canada Journal of Zoology* 66: pp. 228-238

Lowrey, B., Garrott, R.A., McWhirter, D.E., White, P.J., DeCesare, N.J., and Stewart, S.T. 2018. Niche similarities among introduced and native mountain ungulates. *Ecol Appl* 28 (5): 1131-1142 pp. 10.1002/eap.1719

Mountain Goat Management Team. 2010. Management Plan for the mountain goat (*Oreamnos americanus*) in British Columbia. Victoria, B.C. B.C. Ministry of Environment. 87 p.

Parks, L.C., Wallin, D.O., Cushman, S.A., and McRae, B.H. 2015.

Landscape-level analysis of mountain goat population connectivity in Washington and southern British Columbia. *Conservation Genetics* 16 (5): 1195-1207 pp.

10.1007/s10592-015-0732-2

Pettorelli, N., Pelletier, F., Von Hardenberg, A., Festa-Bianchet, M., and Cote,

S.D. 2007. Early onset of vegetation growth vs. rapid green-up: impacts on juvenile mountain ungulates. *Ecology* 88 (2):381-90 pp. 10.1890/06-0875

Rice, C.G., and Gay, D. 2010. Effects of Mountain Goat Harvest on Historic and Contemporary Populations. *Northwestern Naturalist* 91: 40-57 pp.

Smith, B.L., and DeCesare, N.J. 2017. Status of Montana's mountain goats: A synthesis of management data (1960–2015) and field biologists' perspectives. Missoula, MT. Montana Fish, Wildlife and Parks. 52 p.

White, K.S., Levi, T., Breen, J., Britt, M., Meroun, J., Martchenko, D., Shakeri, Y.N., Porter, B., and

Shafer, A.B.A. 2020. Integrating Genetic Data and Demographic Modeling to Facilitate Conservation of Small, Isolated Mountain Goat Populations. *The Journal of Wildlife Management* 85 (2): 271-282 pp.

10.1002/jwmg.21978

White, K.S., Pendleton, G.W., Crowley, D., Griese, H.J., Hundertmark, K.J., McDonough, T., Nichols, L., Robus, M., Smith, C.A., and Schoen, J.W. 2011. Mountain goat survival in coastal Alaska: Effects of age, sex, and climate. *The Journal of Wildlife Management* 75 (8): 1731-1744 pp. 10.1002/jwmg.238

Young, K.B., Lewis, T.M., White, K.S., and Shafer, A.B.A. 2022. Quantifying the effects of recent glacial history and future climate change on a unique population of mountain goats. *Biological Conservation* 272 10.1016/j.biocon.2022.109631

Although the Regional Forester's rationale for omitting the mountain goat from the NPCNF SCC list cites the Idaho Mountain Goat Management Plan 2019-2024,²⁶ it fails to integrate relevant information about the species' conservation status, threats, and management priorities. As a result, the LMP fails to include management direction supportive of species conservation and recovery goals. "The mountain goat is recognized as a Species of Greatest Conservation Need, priority Tier 3, in the Idaho State Wildlife Action Plan (SWAP, IDFG 2017). The Action Plan is the state's guiding document for managing and conserving species before they become too rare and costly to protect. Proactive guidance in SWAP promotes recovery efforts and appropriate land-use measures, and builds and strengthens partnerships to conserve Idaho's wildlife heritage."²⁷

The Idaho Mountain Goat Management Plan addresses "well-documented" human disturbances to mountain goats from recreational activities,²⁸ including detailed descriptions of the potential for displacement from winter and nursery areas:

Rapidly expanding and innovative technology has resulted in lighter equipment and more powerful machines, allowing more people to access remote alpine environments with increasing frequency. In addition, as climate changes and traditional recreation areas receive less snow, more recreation activity and pressure will be placed on higher elevation, remote habitat typically favored by mountain goats. Several studies have indicated ungulates do not become habituated to repeated, cumulative aerial disturbance, even over multiple years of the same disturbance (Bleich et al. 1994, Frid 2003). Fleeing from disturbance and vigilance can increase with repeated exposure to human disturbance, resulting in sensitization rather than habituation to human presence (Frid and Dill 2002).

The long-term result of repeated disturbance by helicopters, snow machines, snow bikes, ATVs, hikers, cross-country skiers, or even logging or road building may be displacement from important winter and nursery areas, which could subsequently lead to declines in mountain goat populations.²⁹

The Idaho Mountain Goat Management Plan also addresses threats from climate change to mountain goats, citing studies predicting that mountain goat habitat will shrink and become more isolated and fragmented,³⁰ and that the species potentially has low adaptive capacity.³¹

The Idaho Mountain Goat Management Plan's management directions and strategies³² include several that should inform and be incorporated into the SCC rationale and NPCNF LMP components:

Management Direction: IDFG will collaborate with land management agencies (e.g., USFS) to incorporate habitat protection and mitigation measures and strategies in land use and resource management plans.

- * Strategy [ndash] Place conservation of existing quality mountain goat habitat as high priority for habitat management.
- * Strategy [ndash] Identify critical areas, including occupied winter ranges and nursery group areas.
- * Strategy [ndash] Identify and evaluate potential threats to mountain goat habitat and coordinate with land managers (e.g., USFS, Bureau of Land Management [BLM], Idaho Department of Lands [IDL]) and recreation groups to address those activities.
- * Strategy -- Work with land managers (e.g., USFS, BLM, IDL) and recreation groups to minimize impacts of disturbance in mountain goat habitats by developing best-management practices for recreational activities, including over-snow recreational activities and

helicopter-based recreation, by 2022.

- * Strategy [ndash] Develop a plan to identify and prioritize research needs for all Idaho mountain goat populations before 2020. Develop proposals for prioritized projects that identify number and type of radio-collars necessary to answer research questions. These projects could include efforts to radio-collar adult mountain goats to examine habitat use and movement patterns where this need is identified as a priority. Use survival and movement data from radio-collared mountain goats to provide insight into effects of recreation.

Management Direction: IDFG staff will work to better understand existing and potential effects of changing climate, specifically changes in severity of winter and summer temperatures, on mountain goat recruitment rates, survival, and distribution, as well as alpine habitat responses.

- * Strategy [ndash] Identify and support collaborative research among partners, standardization of methods, and development of opportunities focused on identifying and understanding changes in climatic conditions that could affect mountain goat populations.
- * Strategy [ndash] Work with university researchers to develop climate models at appropriate scales for management of mountain goats in Idaho.
- * Strategy [ndash] Engage land management agencies (e.g., USFS) in collaborative efforts to address direct and indirect threats, such as road building, mining, and impacts from recreational activities, to mountain goat populations that may compound effects of climate change.

The Idaho Mountain Goat Management Plan separately sets out management direction and strategies specific to the Black Snow Population Management Unit (PMU),³³ which should inform and be incorporated into the SCC rationale and NPCNF plan components:

Management Direction: IDFG will work to maintain a stable to increasing mountain goat population in Black Snow PMU.

* Strategy [ndash] Collaborate with Idaho Panhandle and Nez

Perce-Clearwater national forests and Bureau of Land Management to minimize potential impact of motorized and non-motorized recreation on mountain goats.

* Strategy [ndash] Work with Idaho Panhandle and Nez Perce-Clearwater national forests to identify ways to improve foraging habitat and population connectivity.

* Strategy [ndash] Coordinate with Montana Fish, Wildlife and Parks on surveys, monitoring, and potential harvest.

As a result of this failure to list the mountain goat, the plan provisions and environmental analysis are inadequate to meet the requirements of supporting the species[rsquo] capability to persist over the long-term in the plan area, especially in the Great Burn RWA/Hoodoo Roadless Area.³⁴

Resolution

First, we request that the Regional Forester add the mountain goat to the list of Species of Conservation Concern for the NPCNF, incorporating citations and information contained in literature presented in the SCC rationale for the LNF.

Second, GBCA requests that the final plan be amended to reflect this SCC designation, and to address multiple threats to the species within the plan area[mdash]particularly those arising from expanded winter motorized recreation and effects of climate change[mdash]coupled with the inherently small populations of mountain goats living within the plan area.

Meeting Request

GBCA requests a meeting with the relevant USFS representatives to discuss and resolve these objections, pursuant to 36 C.F.R. Section 219.57(a).

Conclusion

Thank you for your time, and for your willingness to engage with our objections. We look forward to continuing this process. Please reach out with any questions or for clarification.

Sincerely,

Hayley Newman Executive Director

Great Burn Conservation Alliance