Questions and Answers – Species of Conservation Concern Identification in the Northern Region (Version 3)

The purpose of this document is to briefly answer questions we've heard regarding the evaluation and identification of species of conservation concern (often referred to as SCC). We anticipate updating this document over time as we continue to work with units and our stakeholders. See the Northern Region's SCC website and each individual unit's plan revision website for additional information.

What is a species of conservation concern?

The 2012 planning rule defines a species of conservation concern as "a species, other than a 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" (36 CFR 219.9(c)). In other words, it's a species for which we're concerned about whether it will remain on a specific Forest Service unit for a long time.

How does the Northern Region identify species of conservation concern?

The Forest Service Handbook at 1909. 12, chapter 10, describes specific criteria to identify a species of conservation concern. A description of how we used these criteria to identify plant and animal species in the Northern Region can be found on the website here: https://www.fs.usda.gov/detail/r1/landmanagement/planning/?cid=fseprd500402.

How are public comments considered when identifying species of conservation concern?

Regional specialists evaluate all species for which tribes and other stakeholders have expressed concern for long-term persistence. These species are noted as "LC" (local concern) or "TC" (tribal concern) on the evaluation spreadsheets. When comments from the public or partners provide new science or additional information on a particular species, specialists will re-examine all available evidence and update the evaluation documentation. The regional forester may then add or remove species from a unit's species of conservation concern list based on whether or not the updated evaluation indicates substantial concern for long-term persistence in the plan area.

The addition of westslope cutthroat trout for the Helena-Lewis and Clark and Custer Gallatin National Forest final plans provides an example of where public comment providing additional scientific information led to a change in the units' species of conservation concern lists.

Where do I find the rationale used for identifying (or *not* identifying) a species as a species of conservation concern?

Identifying species of conservation concern is a multi-step, iterative process to determine which species are native and known to occur in the plan area, and then identify whether there is substantial concern for long-term persistence in the plan area. In order to more clearly track the rationale for including or excluding a species from a unit's list, the screening criteria information is presented online in a set of unit-specific spreadsheets. Each unit undergoing revision has, or will have, up to three evaluation spreadsheets: one for terrestrial wildlife, one for aquatic wildlife, and

one for plants. The evaluation spreadsheets summarize the information used to determine if a species meets the criteria for identifying it as a species of conservation concern. The spreadsheets document the rationale for all species that were considered, regardless of whether or not a given species was ultimately identified as a species of conservation concern.

In 2013, the Nez Perce-Clearwater National Forests received the first species of conservation concern list in the Northern Region. This was during early implementation of the 2012 planning rule. The draft Nez Perce-Clearwater Forests Plan Assessment only provided information for the species that were identified, not those that were excluded. We've learned a lot about implementing the 2012 planning rule and identifying species of conservation concern in the years since issuing Nez Perce-Clearwater National Forests' list, and we have worked to improve how we share the documentation.

As a result, forest and regional office staff have been working to re-evaluate the 2013 Nez Perce-Clearwater National Forests' list, as well as evaluate additional species tribal and other stakeholders have asked be considered. An updated list and rationale spreadsheets, located on the Northern Region website, were provided for public comment concurrent with the comment period on their draft plan and draft environmental impact statement. Regional office staff are reviewing the comment received for new information that may lead to changes for the final plan.

Similar iterative efforts were conducted for the Flathead, Helena-Lewis and Clark, and Custer Gallatin National Forests throughout their land management plans' development. Their documentation and rationale provided for the final plans are located on the Northern Region website.

What geographic scale is used to identify species of conservation concern?

The rule's definition explicitly states that substantial concern for persistence applies to the geographic scale of a specific unit's plan area. Species may not be identified as species of conservation concern based on concern at scales that are larger (e.g., a state) or smaller (e.g., a specific watershed). The directives use broader- and local-scale concerns as a way to help the regional forester determine, at the beginning of the identification process, which species should be considered. Such consideration can help identify limiting factors that may be applicable in the plan area. Hence, Forest Service Handbook 1909.12, chapter 10, section 12.52d specifies categories of species (such as NatureServe state ranks or local conservation concern) that should or must be *considered* for species of conservation concern status. However, this consideration does not imply these species should or must be identified as species of conservation concern in the absence of substantial concern about its capability to persist in the plan area.

Can species of conservation concern be identified even if they are threatened by circumstances beyond the Forest Service's control?

Yes. The regional forester identifies a species of conservation concern when best available scientific information indicates substantial concern for its long-term persistence in the plan area, irrespective of whether it is threatened by circumstances beyond the Forest Service's control. There must be substantial concern about the ability of the species to persist in the plan area, but the threats or stressors that cause concern do not need to occur in the plan area. In fact, the planning rule at 219.9(b)(2) acknowledges that it may be beyond Forest Service authority, or not within the inherent

capability of the plan area, to maintain or restore the ecological conditions to maintain a viable population of a species of conservation concern in the plan area.

Can species of conservation concern be identified when there is insufficient information available to conclude substantial concern?

No. The Land Management Planning Handbook (FSH) 1909.12, chapter 10, section 12.52 states that if there is insufficient scientific information available to conclude substantial concern about a species' capability to persist in the plan area over the long-term, that species *cannot* be identified as a species of conservation concern. Regional and unit specialists carefully evaluate the best available scientific information to determine if there is sufficient information for each species considered. That documentation is found in the unit-specific species evaluation spreadsheets on the Northern Region's species of conservation concern webpage. However, even when some types of information are limited, the weight of evidence may still indicate substantial concern when we consider what we do know about habitat, threats, abundance, geographic distribution, reproductive potential, dispersal capabilities, and other relevant factors.

In addition, the planning rule and planning directives do not require the Forest Service to use information solely originating from the plan area to determine if there is substantial concern for long-term persistence of a species. Instead, we must use accurate and reliable scientific information relevant to issues being considered. Data collected outside of the plan area, such as in different states or habitats, may still be relevant where it provides insight to conditions within the plan area.

Are all species with NatureServe ranks of G1 and G2 or state ranks of S1 and S2 automatically identified as species of conservation concern?

No. NatureServe and the state Natural Heritage Programs may assign a rank of G1/G2 or S1/S2 because a species is rare or endemic (only occurs within a small area), even if nothing is known about existing threats or population trends. When evaluating species the regional forester considers a broad suite of information, and rarity alone does not necessarily result in identification as a species of conservation concern unless population declines, known threats, or other relevant information indicates "substantial concern for persistence" of the species in the plan area. For some species, there is insufficient information to determine if there is substantial concern, therefore they cannot be identified as species of conservation concern.

How does the Northern Region decide whether a species is currently known to occur in the plan area as opposed to being known only historically?

In late 2017, the Forest Service adopted NatureServe's approach for determining historic occurrences. That is, if habitat is available and a major disturbance hasn't occurred, a species is generally considered historical if it has been surveyed but not reconfirmed in the plan area for at least 20 years. For many short-lived insects, a shorter interval may be appropriate. For unusually stable habitats (like undisturbed caves), or for certain plants whose seeds may persist and remain viable in the soil for decades, up to 40 years may be used. With very few exceptions, a species occurrence will be regarded as historic after 40 years without confirmation, even if no effort has been made to locate the species. If new information is received indicating the species does occur,

the regional forester will evaluate the information and adjust the list if necessary, using the guidance at FSH 1909.12, chapter 20 section 21.22b.

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 Endangered Species Act. This group represents a separate category of at risk species and therefore, they *cannot* be identified as species of conservation concern 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.

How does the Forest Service consider other government agency species' lists such as those that identify state or tribal species of concern?

The process papers and species documentation indicate how the Forest Service considered other government agency lists for species found within the plan area of each unit. However, the criteria for identifying other agencies' species list often differ from the criteria for identify species of conservation concern described in Forest Service regulation and policy. Thus, each agency's or government's list may differ.

See the other questions and answers in this document for information about how Forest Service criteria influence identification of species of conservation concern and how revised plans provide conditions needed by those species regardless of any special status or designation.

How do revised plans provide conditions needed by species not identified as species of conservation concern?

The 2012 Planning Rule requires plans to use a complementary ecosystem and species-specific approach to provide for the diversity of plant and animal communities and maintain the persistence of *all* native species in the plan area, regardless of any special status, listing, or designation. This approach is often referred to as the coarse-filter/fine-filter approach.

The ecosystem-level plan components are designed to maintain or restore healthy ecosystems that support a wide variety of species. The Forest Service expects that by focusing on healthy ecosystems, management will create conditions that support the long-term persistence of most native species in the plan area by maintaining a diversity of plant and animal communities. The species-specific plan components are intended to provide for species whose specific habitat needs may not be fully met under the ecosystem-level plan components.

Although a species that is secure in the plan area cannot be identified as species of conservation concern, the planning unit may serve a distinctive role in the conservation of a species considering risks across its broader range. Given that forests are required to evaluate the plan area's distinctive roles and contributions within the broader landscape, the responsible official for the land management plan has the discretion to include plan components where needed to contribute to the

ecological sustainability of a species across its range, even if it has not been identified as a species of conservation concern. An example of this can be found for bison on the Custer Gallatin National Forest.

How do regional forester sensitive species differ from species of conservation concern, and why aren't they automatically identified as species of conservation concern?

The National Forest Management Act (NFMA) requires the Forest Service to "provide for the diversity of plant and animal communities." The 1982 planning rule implemented this aspect of the Act by requiring the agency to manage habitat for viable populations of native and select non-native vertebrates, and through development of management indicator species. The development of sensitive species policy embodies part of the Agency's commitment to manage habitat for viable populations as directed in the 1982 planning rule. The 2012 planning rule implements the NFMA requirement to "provide for the diversity of plant and animal communities" using a different approach**.**

The 2012 planning rule emphasizes developing land management plan components to maintain or restore ecosystem integrity and ecosystem diversity as part of the NFMA's broader requirement to promote the diversity of plant and animal communities.

These ecosystem plan components are intended to provide ecological conditions needed for the persistence of most species. If these plan components are not sufficient, the Planning Rule calls for the development of additional species-specific plan components to contribute to the recovery of federally recognized threatened and endangered species, conserve proposed and candidate species, and maintain or contribute to the viability of species of conservation concern.

This dual approach is designed to provide a land management plan that keeps common species common and promotes conservation of species recognized under the Endangered Species Act (ESA), as well as those that are not recognized but may be at risk and are known to occur in the planning area.

Although there are similarities in the goals for identifying both sensitive species and species of conservation concern, the processes and purpose for identifying the species lists are different. See the table below for a comparison.

Table 1. Purpose and identification process comparison for species of conservation concern and sensitive species.

	Species of Conservation Concern	Regional Forester Sensitive Species
Regulatory or Policy Framework	2012 Planning Rule	Forest Service Manual 2670 direction for implementation of the 1982 Rule
Geographic Scale	Each plan area (forest or grassland unit boundary)	Regional

	Species of Conservation Concern	Regional Forester Sensitive Species
Occupancy	Species must be **native and known to occur** within the plan area	Species must be known or expected (suspected) to occur
Uncertainty	Best available scientific information must indicate **substantial concern** for **capability to persist**. Uncertainty may lead to excluding species from species of conservation concern list	Uncertainty does not necessarily exclude species from inclusion. Some species are included on RFSS list with little known information
Taxa evaluated	Native plants and animals	All existing native and **desired non-native** plants, fish, and wildlife
Planning purpose	Ensure the land management plan includes plan components to provide the ecological conditions to both maintain the diversity of plant and animal communities and support the persistence of most native species in the plan area.	Review programs and activities as part of the National Environmental Policy Act process through a biological evaluation, to determine their potential effect on sensitive species.

How is the list of species of conservation concern kept current?

If new scientific information indicates a potential change is needed to the list of species of conservation concern, forest and regional office staff will evaluate that information following the criteria described in the Forest Service Handbook at 1909.12 section 21.22b and Northern Region process documents. If that evaluation leads the Regional Forester to add a species of conservation concern, the Forest or Grassland Supervisor will assess whether existing plan components would provide the ecological conditions necessary to maintain the long-term persistence of the species within the plan area, and amend the plan if needed. If the Regional Forester removes a species of conservation concern, the Forest or Grassland Supervisor will review the plan and amend the plan, if appropriate.