Objection Issue Briefing Paper: Identification of Species of Conservation Concern

Date: Sept. 30, 2020.

Contact: Christine Dawe, Acting Associate Deputy Chief

Email: christine.dawe@usda.gov

DRAFT: For purposes of facilitating discussion for objection resolution process only.

Summary of objection issues:

- 1. Insufficient rationale for not designating specific species as SCC
- 2. Failure to consider broadscale threats stemming from outside the planning area in determining "substantial concern."
- 3. Wolverine and bighorn sheep

Background information:

The process papers (located on the <u>Regional Office SCC web page for animals and plants</u>) are the primary forms of documentation explaining the change from the potential species of conservation concern list and the process used to finalize the list of species of conservation concern.

At the assessment phase, the planning team identified all species that met the criteria outlined in Step 1 A-I of the process papers. With this preliminary list, the Regional SCC team then applied Step 2 A-C to see which of the species met the criteria specified in the planning directives at FSH 1909.12, chapter 10, section 12.52c. Criteria include: native to and known to occur within the planning area; best available scientific information indicates a substantial concern for the ability of the species to persist within the plan area over the long term; and sufficient information to determine if there is a substantial concern about the ability of the species to persist within the plan area over the long term. If there was insufficient information or no substantial concern about long-term persistence within the plan area, the species was not identified as an SCC.

The Regional SCC team leveraged the expertise and engagement of the public to help shape both the species identified for PSCC and SCC and the information identified as best available science. In addition to the process papers already cited, the Regional SCC team developed a list of frequently asked questions which further explains the SCC identification process and address common questions such as the difference between Regional Forest Sensitive Species and Species of Conservation Concern; how NatureServe rankings are utilized; and how public expertise and input is incorporated into the list, among other items.

Summary examples of proposed resolution(s) submitted by objectors:

Designate wolverine a species of conservation concern if FWS elects not to list wolverine



(currently proposed for listing) as a threatened or endangered species under the ESA.

2. Designate bighorn sheep as a Species of Conservation Concern.

Objectors/Interested Persons:

Name	Organization	Obj/Interested Person
Peter Nelson	Defenders of Wildlife	Objector
Jocelyn Leroux (lead objector)	Western Watersheds Project, Alliance for the Wild Rockies, WildEarth Gaurdians	Objector
James Bradley		Interested Person
Eric Sivers	Montana Bicycle Guild	Interested Person
Denny Palmer		Interested Person
Rick Kerr		Interested Person

