

## **FACA Presentation on New Forest Planning Rule – May 29, 2014**

Six years ago two dozen people representing timber, county elected officials, motorized recreation, sportsmen, conservation and tribal interests gathered in a restaurant in Kamiah, Idaho. What brought us to the table, literally, was the fact that the status quo on public land management wasn't working.....for anyone. After decades of litigation on forest management it was time to find a better path forward. From that meeting the Clearwater Basin Collaborative was born and remains vibrant and active today.

**The CBC successes are many.** They include making an on-the-ground difference in restoration and veg management. According to Forest Supervisor Rick Brazell, the Nez Perce/Clearwater NF has reached over 115% of its stated vegetation management objective by the third quarter of this year due almost exclusively to the effort and active support of the CBC. CBC has also collaborated with the Forest Service on our Clear Creek CFLRA project which is predicted to bring \$40 million into the Basin over the course of the project. And, as part of our CFLRA project we have designed and implemented a Clearwater Basin Youth Conservation Corps to teach restoration work skills to 4 crews of area youth. We were able to expand the program this year through money provided by the regional office of the USFS and partnering with the Idaho Department of Labor. The CBC is also current collaborating, via a formal Memorandum of Understanding with the forest, on 14 restoration projects on the forest and, at the same time, litigation stands at zero showing the power of collaboration over time across a wide variety of interests.

In addition, an Agreement and Work Plan was unanimously approved in May, 2013 that outlines land and water protection, support for counties and education opportunities for local residents. The Agreement and Work Plan forges a new path forward in public land management. But it would not have happened had the CBC not been a long-term collaborative, invested in all parties and committed to working with the Forest Service for years to come.

### **But this collaborative process and the new forest planning structure raises some challenges for the Forest Service.**

Given that the forest is an active partner with the CBC with a formal MOU outlining that relationship, how will the forest supervisor reconcile the input from the CBC Agreement and Work Plan with the recommendations of the public forest planning rule input? **What, for example, happens to all the decision making and consensus building around land management and protection that the CBC has worked on for six years?** The NezPerce/Clearwater NF was selected as an early adopter of the new forest planning rule because of the Clearwater Basin Collaborative. But, the unintended consequence of two simultaneous processes, one long standing and designed for future longevity, and the other an in-depth public input process with less emphasis on long term commitment of participants over time, creates a dilemma for the Forest Supervisor. **How will he integrate these two very different processes in terms of valuing their input and their ability to stay engaged for years to come?**

The Federal Register that speaks to the new forest planning rule makes a bold statement. It says; "What matters is that participants can contribute to an understanding of relevant issues, can help get planning or project work done, and can help increase organizational and community capacity."

**How will the public input process for the new forest planning rule provide the kind of strategic support for project planning and implementation and capacity building that the forest service will need in the future as well as the planning needed to increase community capacity?** The Clearwater Basin Collaborative is working to increase the capacity of the agency through a potentially robust Master Stewardship Agreement that will engage

nongovernmental agencies in the support of land management and restoration on the NezPerce/Clearwater National Forest. We feel with the expected decline in agency capacity, support from the nongovernmental sector is critical to maintain active and effective forest management to increase forest resiliency and sustainable timber supply for the future. **How the current public input process will provide critically needed capacity for the agency will be a significant challenge.**

**Definitions matter.** The new forest planning rule has required an intensive, open and engaged public input process and a collaborative dialogue for which the agency should be commended. The forest service planning rule team has done an excellent job of outreach and has welcomed diverse stakeholders in the process.

**However, a collaborative is different.** A collaborative is a structured process in which a collection of people with diverse interests share knowledge, ideas and resources while working together in an inclusive and cooperative manner TOWARD A COMMON PURPOSE. The CBC's purpose is very clear. "Our vision is to enhance and protect the ecological and economic health of our forests, rivers and communities within the Clearwater Basin by working collaboratively across a diversity of interests to meet the practical needs and interests of all participants insofar as that is possible through a problem solving approach to challenges." **Simply calling a process a collaborative doesn't make it so. Therefore, a challenge for each forest will be to form collaboratives that not only give input but which also are designed for longevity and capacity building many years into the future.**

These and other questions need to be answered moving forward as this planning process unfolds across our nation. The Clearwater Basin Collaborative has a vested interest in the management of the NezPerce/Clearwater NF. We have strived to be bridge builders between diverse interests and the Forest Service. The CBC has enjoyed a rich and rewarding relationship with NezPerce/Clearwater NF personnel and we look forward to many more years working together for the health of our public land, water and wildlife while ensuring a stable supply of forest products to support robust rural economies.

In closing, let me emphasize the hard work and commitment a collaborative takes to bring sometimes diametrically opposed members to consensus and support of one another. To discount this effort and commitment could have serious repercussions for future collaborative efforts designed to increase agency capacity and resolve long standing conflicts. We hope the CBC input will be viewed as just as valuable as the planning rule input process. To do otherwise would jeopardize a collaborative that is leading the way in finding innovative solutions to public land management and protection.

Holly Endersby, Conservation Director

Backcountry Hunters & Anglers and Clearwater Basin Collaborative member

# *Swan View Coalition* Nature and Human Nature on the Same Path



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## **Statement of Keith Hammer to the US Forest Service Planning Rule Advisory Committee**

**May 29, 2014**

My name is Keith Hammer and I am chair of the non-profit Swan View Coalition. We've been working since 1984 to conserve and restore fish and wildlife on the Flathead National Forest and in the greater Flathead River Basin.

On the Flathead and elsewhere collaboration is being gamed by those seeking political advantage. Rather than resolving conflicts through use of the best available science, collaboration is being used to politically marginalize those who work to enforce use of the best available science.

The Whitefish Range Partnership rushed to conclude its collaboration in order to be "first out of the chute" as the Flathead was just inviting the public to its collaboration. The Forest Supervisor, prior to any substantial agency or public review of it, said the Whitefish Range proposal "may be very close, if not exactly what we end up doing." The Revision Team Leader said those not a part of the Whitefish Range Partnership could "take pot shots at it." This hardly builds confidence in the broader public that their concerns or the best available science will be fairly considered by the Forest Service.(1)

The Whitefish Range Partnership proposes to substantially increase the suitable timber base by increasing logging in grizzly bear security core habitats and by challenging "existing lynx management strategies."(2) This was then put before the full Forest collaborative. There was never any detailed discussion at any of the revision meetings I attended about whether or not the best available science supports such an increase in logging on the Flathead.

The Assessment of the Flathead National Forest, required by the Planning Rule and promised in the Fall of 2013, was not actually completed until mid-April and hard copies were not available until last week - after the collaborative process was essentially over.(3) The Assessment includes maps of grizzly bear security core and key wolverine habitat overlain with snowmobile use areas. These new maps could have been key during earlier revision meetings.

Instead, the meetings were a feeding frenzy as participants asked for logging and the use of motor vehicles on National Forest lands with no clear criteria firstly described to insure those pursuits would be in line with the best available science and the law. There were no elk, bears, wolverine, lynx, bull trout, or other wildlife at these meetings - so application of the best available science and legal requirements is the only way these species can be given a voice in the process.

Former Forest Service Chief Jack Ward Thomas and others seized on using collaboration to marginalize those who resort to litigation to insure the needs of fish and wildlife are being met. Retired Forest Service biologists Al Espinosa and Harry Jageman tell Congress "The Collaborative Forest Landscape Restoration Act . . . is largely being used to circumvent existing environmental laws and give control of the management of our National Forests to local special interests."(4)

We in March submitted our Citizen reVision of the Flathead Forest Plan, alongside a substantial bibliography of the science it is based upon.(5) Will the Flathead write a new Forest Plan that represents the will of the American public, whose laws require the use of the best available science, or will it write a Plan that hedges on those laws in order to placate local residents?

There is renewed vigor in the movement to turn control of federal lands over to State or local governments. To what degree is collaboration feeding this movement toward local control over America's public lands?

Under the new Planning Rule, the use of collaboration is optional, while the use of the best available science is mandatory. What recommendations could this Committee make to insure that collaboration, when used, reinforces use of the best available science rather than marginalizing those who use it to give voice to fish and wildlife?

**(Notes, Sources and Additional Concerns on the Following Page)**

## Notes and Sources

1. Links to the news articles quoting the Flathead Forest Supervisor and Revision Team Leader can be found in our letter to the editors at:  
[http://www.swanview.org/home/articles/blog/flathead\\_skews\\_forest\\_plan\\_revision\\_process/180](http://www.swanview.org/home/articles/blog/flathead_skews_forest_plan_revision_process/180)
2. The timber management section of the Whitefish Range Partnership Agreement can be found on pdf pages 23-28 at:  
[http://www.headwatersmontana.com/sites/default/files/WRP\\_Final\\_11\\_18\\_2013.pdf](http://www.headwatersmontana.com/sites/default/files/WRP_Final_11_18_2013.pdf)
3. The Assessment of the Flathead National Forest can be found at:  
<http://www.fs.usda.gov/detailfull/flathead/landmanagement/planning/?cid=stelprdb5422786&width=full>
4. Sources for the statements of Jack Ward Thomas, Rebecca Watson, Al Espinosa, and Harry Jageman on page 2 of our newsletter at:  
[http://www.swanview.org/newsletters/Fall\\_2013e.pdf](http://www.swanview.org/newsletters/Fall_2013e.pdf)
5. Our Citizen reVision of the Flathead Forest Plan can be found at:  
[http://www.swanview.org/reports/Citizen\\_reVision\\_Flathead\\_Forest\\_Plan.pdf](http://www.swanview.org/reports/Citizen_reVision_Flathead_Forest_Plan.pdf)

## Additional Concerns

- A. We outline other concerns with the Flathead's collaborative process, and the contracting of Meridian Institute to conduct it, in an April 24, 2014, letter to the Flathead Forest Supervisor. It can be found at:  
[http://www.swanview.org/reports/Weber\\_Letter\\_140424.pdf](http://www.swanview.org/reports/Weber_Letter_140424.pdf)
- B. We report further on how misdeeds at the Udall Foundation, between the time it was audited by USDI's Office of the Inspector General and a follow-up report was issued by the General Accounting Office, appear to have tainted the contracting of Meridian Institute to conduct the Flathead's collaborative process. See page 2 of our newsletter at:  
[http://www.swanview.org/newsletters/Winter-Spring\\_2014e.pdf](http://www.swanview.org/newsletters/Winter-Spring_2014e.pdf)



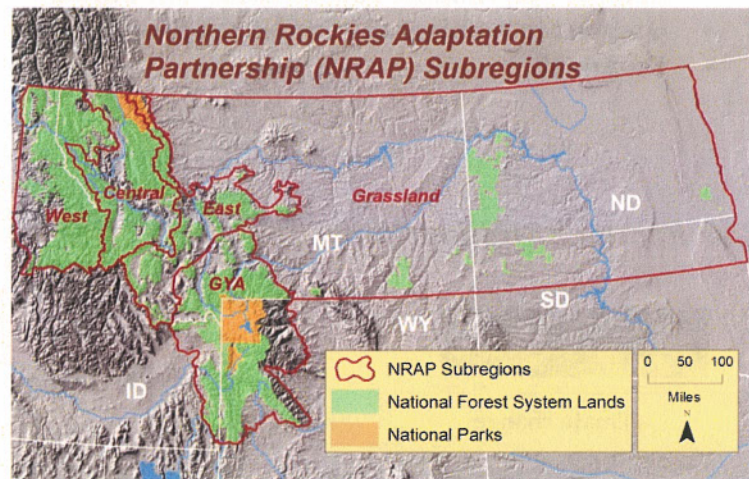


## Objectives

- **Develop a framework and tools for resource managers to incorporate the best available science** into landscape/planning assessments, resource management and planning, resource monitoring, project design, NEPA analysis, conservation strategies, and State Wildlife Action Plan updates.
- **Synthesize the best available scientific information to assess climate change vulnerability** and develop adaption options throughout the U.S. Northern Rocky Mountains ecoregion in order to understand and mitigate potentially adverse effects of climate change on natural resources and ecosystem services.

## Approach

- **Establish an effective long-term science-management partnership** involving multiple agencies and stakeholders to continually assess climate change science and its implications for biophysical and social resources. (*Winter 2014*)
- **Conduct a vulnerability assessment of priority resources** (species, ecosystems, ecosystem services) (*Summer 2014*) and **develop associated adaptation strategies** (*Winter 2015*) to help build resistance, enhance resilience, and facilitate ecological transitions for the Northern Rockies ecoregion.
  - The assessment will focus on *climate trends, water resources, fisheries, wildlife, forested and non-forested vegetation, disturbance regimes, recreation, and ecosystem services*. The assessment and adaptation strategy will be peer reviewed and published, *providing the scientific foundation for operationalizing climate change* in planning, ecological restoration, and project management.
- **Educate and engage** with partners, stakeholders, decision makers, planners, and resource specialists to:
  - Build an enduring partnership to facilitate application of climate-smart management.
  - Provide tools to incorporate and apply adaptation options through assessment, planning, project implementation, and monitoring.
- **Conduct workshops for each subregion** (*Fall 2014*) with scientists, land managers, conservation practitioners, and other stakeholders to review the vulnerability assessment.
  - Downscale information from the region-wide assessment to identify the most significant vulnerabilities to climate change for priority resources in each subregion.
  - Identify adaptation strategies and tactics to reduce resource vulnerabilities. Adaptation strategies and tactics will be linked to corresponding management operation levels at different spatial and temporal scales.
  - Workshop dates and venues
    - Oct 20-21      Missoula (Central subregion)
    - Oct 23-24      Coeur D'Alene (West subregion)
    - Oct/Nov TBA    Bozeman (GYA subregion) and Helena (East subregion)
    - October TBA    Bismarck (Grassland subregion)

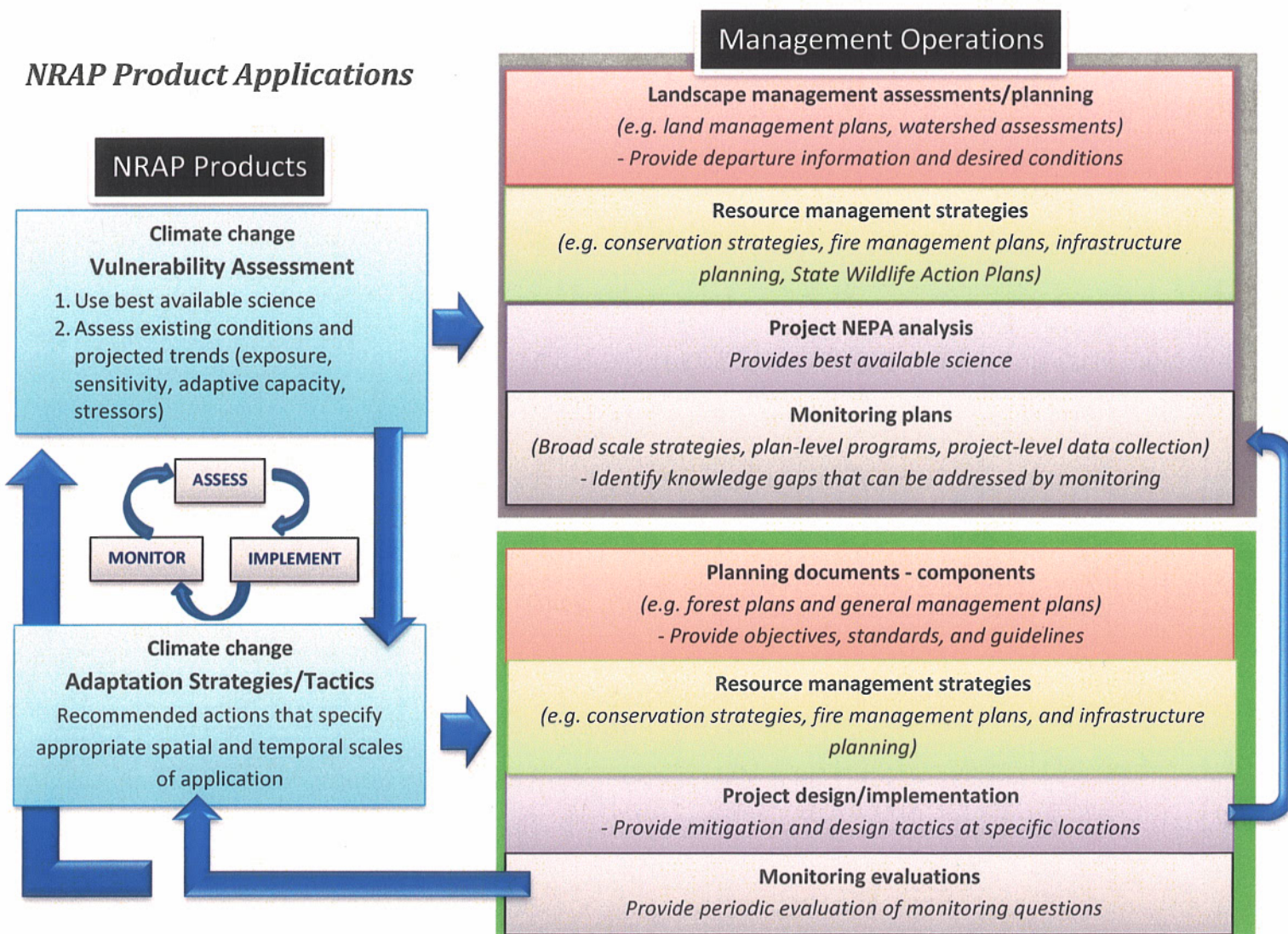




## Partners

- **U.S. Forest Service** Northern Region, Intermountain Region, Rocky Mountain Research Station, Pacific Northwest Research Station, and Climate Change Advisor's Office
- **National Park Service** Intermountain Region and Climate Change Office
- **U.S. Geological Survey** Forest and Rangeland Ecosystem Science Center, Northern Rocky Mountain Science Center, North Central Climate Science Center, and Western Geographic Science Center
- **U.S. Fish and Wildlife Service** Great Northern Landscape Conservation Cooperative and Plains and Prairie Potholes Landscape Conservation Cooperative
- **National Oceanic and Atmospheric Administration**
- **Greater Yellowstone Coordinating Committee**
- **Oregon State University Climate Impacts Research Consortium**
- **EcoAdapt**

## NRAP Product Applications



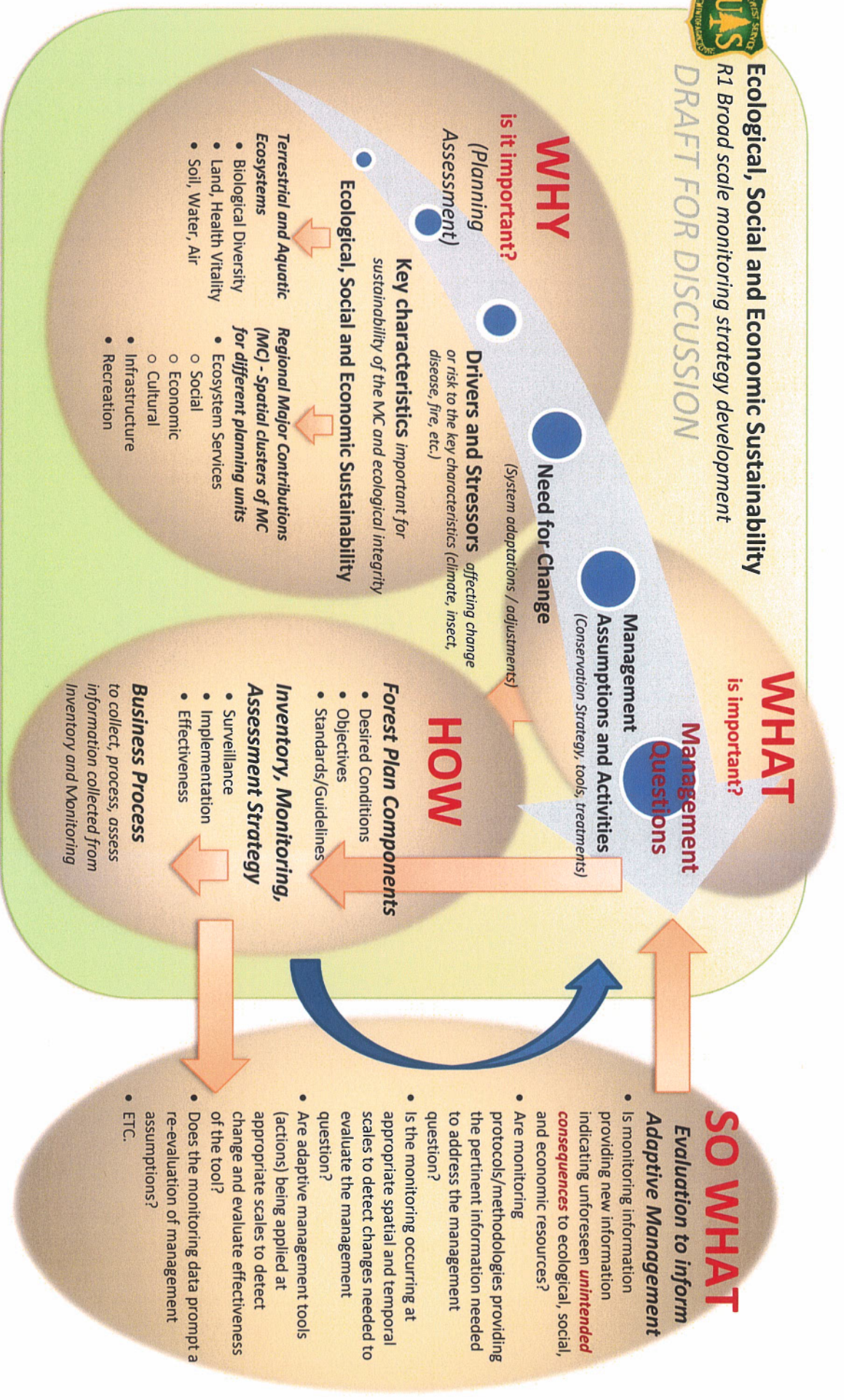




# Ecological, Social and Economic Sustainability

## R1 Broad scale monitoring strategy development

DRAFT FOR DISCUSSION



### WHY

is it important?

(Planning Assessment)

**Key characteristics important for sustainability of the MC and ecological integrity**  
**Ecological, Social and Economic Sustainability**

- Terrestrial and Aquatic Ecosystems**
- Biological Diversity
  - Land, Health Vitality
  - Soil, Water, Air

- Regional Major Contributions (MC) - Spatial planning units for different planning units**
- Ecosystem Services
    - Social
    - Economic
    - Cultural
  - Infrastructure
  - Recreation

**Drivers and Stressors** affecting change or risk to the key characteristics (climate, insect, disease, fire, etc.)

**Need for Change** (System adaptations / adjustments)

**Management Assumptions and Activities** (Conservation Strategy, tools, treatments)

### WHAT

is important?

**Management Questions**

### HOW

**Forest Plan Components**

- Desired Conditions
- Objectives
- Standards/Guidelines

**Inventory, Monitoring, Assessment Strategy**

- Surveillance
- Implementation
- Effectiveness

**Business Process**

to collect, process, assess information collected from Inventory and Monitoring

### SO WHAT

**Evaluation to inform Adaptive Management**

- Is monitoring information providing new information indicating unforeseen **unintended consequences** to ecological, social, and economic resources?
- Are monitoring protocols/methodologies providing the pertinent information needed to address the management question?
- Is the monitoring occurring at appropriate spatial and temporal scales to detect changes needed to evaluate the management question?
- Are adaptive management tools (actions) being applied at appropriate scales to detect change and evaluate effectiveness of the tool?
- Does the monitoring data prompt a re-evaluation of management assumptions? ETC.

**Testimony to the FACA, May 29, 2014**  
**Bert Lindler, Shining Mountains Chapter of the Montana Wilderness**  
**Association**

Good morning. I would like to thank the members of the FACA Committee for giving us the chance to suggest some questions that might improve implementation of the 2012 forest management planning rule.

I am Bert Lindler, a Missoula resident and the immediate past president of the Shining Mountains Chapter of the Montana Wilderness Association. The Association was founded in 1958, played a role in passage of the Wilderness Act and continues to work with communities to protect Montana's wilderness heritage, quiet beauty and outdoor traditions.

I would also like to thank the Nez Perce-Clearwater National Forests (Nez-Clear) for providing video teleconferencing to make it easier for residents in communities near Missoula and Boise to participate in the planning process. The forest's role in arranging a noon meal during all-day sessions set a welcoming tone and gave participants more opportunities to get to know each other.

I have four questions I would like the committee to address.

First, **“What should we call the groups that are formed to help the national forests draft their management plans?”**

I recommend the term “Working Group.” The Nez-Clear used the term “Collaborative.”

During working sessions, forest employees would present draft plan components to small groups. After half-an-hour or an hour, the small groups would share their comments. Similar or identical comments by two or more small groups were highlighted for special consideration. This process works, but I don't think it's well described by the term “collaboration.”

Second, **“How can the public participation requirements of NEPA truly be achieved when the working group process front loads proposed actions with the concerns of local constituencies?”**

Many visitors to the Great Burn Recommended Wilderness come from the Spokane, WA-Coeur d'Alene, ID metropolitan area, population 609,000 in 2011.



Within 100 miles of Spokane-Coeur d'Alene, there are just 100,148 acres of designated wilderness. Recommended wilderness in Mallard-Larkins and the Great Burn helps preserve the possibility of additional wilderness near this metropolitan area, but residents there didn't have the same opportunity to help develop the proposed action as residents of smaller communities who participated in the working group.

**Third, "How can the needs of wildlife, including species of concern and focal species, be addressed before actions are proposed that might harm wildlife?"**

The draft plan's wildlife suitability plan component says "Motorized over-snow travel is not suitable in mountain goat winter range."

The draft plan does not include maps of mountain goat winter range, yet one of the options for recommended wilderness would exclude three areas from the Great Burn Recommended Wilderness for special management snowmobile use. All three areas almost certainly include some mountain goat winter range (Idaho Fish and Game is developing a map based on goat sightings during elk survey flights).

**Fourth, "How can planning with consultation and coordination be conducted across the boundaries of adjoining national forests?"**

The Nez-Clear borders the Lolo, Bitterroot, and Idaho Panhandle National Forests along the Montana-Idaho Divide.

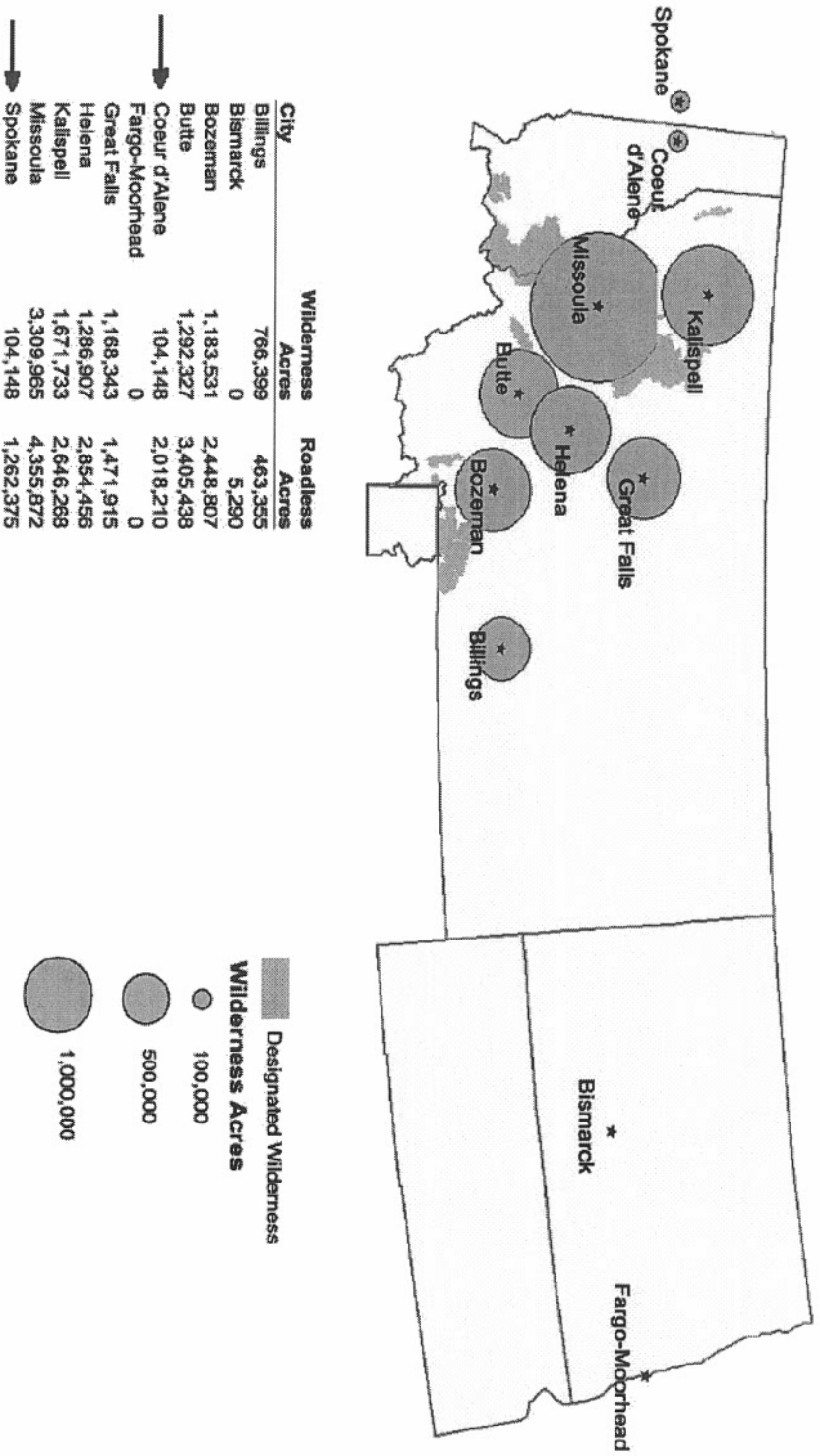
It was clear during the planning process that Idaho Fish and Game, several Idaho counties and the Nez Perce Tribe were involved, but it was not as apparent that the Bitterroot, Lolo, and Idaho Panhandle National Forests were appropriately involved.

The proposed action would carve the Hoodoo and Surveyor snowmobile special management areas out of the center of the Great Burn Recommended Wilderness, which spans the Nez-Clear and Lolo National Forests.

Snowmobile access to these special management areas will be from the Lolo National Forest. On-the-ground enforcement will have to be through the Lolo National Forest, which has faced its own challenges with snowmobile trespass into its portion of the Great Burn Recommended Wilderness.



## Wilderness within 100 Mile Radius of Major Cities



About 609,000 persons live in the Spokane-Coeur d'Alene metropolitan area, making it the 87<sup>th</sup> largest metropolitan area in the United States (2011 data). Red arrows were added to this graphic from the U.S. Forest Service Region 1 2006 Wilderness Needs Assessment.

May 26, 2014

**To:** National Advisory Committee for Implementation of the National Forest System  
Land Management Planning Rule

**Subject:** Advice and Recommendations on Implementation of the Planning Rule

Over the term of my career, my passion for resource management and public service has evolved with experience and continuing education (formal/informal). I served as a US Forest Service District Wildlife Biologist within the Plan Area for 35 years, retiring in 2011. For approximately one year I served as a contracted wildlife biologist on the Nez Perce-Clearwater Forest Plan Revision IDT. I brought to the IDT a perspective of four decades of on-the-ground professional and personal experiences in variety of District level wildlife, fisheries, watershed, grazing, recreation/trails and invasive plant management programs. Similarly, I brought a perspective developed over 40 years working with timber management, prescribed fire and fire suppression.

My role on the IDT was assigned to the incoming Forest Wildlife Biologist and I my contract was terminated September 2013. Since, I have continued involvement as an active participant with the public collaborative group.

The following comments are based on my experiences as a wildlife biologist and IDT member, and my perspectives as a retiree and member of the public. My comments address procedural and technical elements relative to wildlife resources and the Forest Plan Revision effort. I also offer recommendations to refine the process. (I have included with this mailing, my comments to the Wildlife Plan Components presented on April 05, 2014, to the Collaborative Group).

### **Process**

Assessment - The original, and revised, and revised again, development of the wildlife section of the Assessment schedule was typically produced in a very short time frame. With time, more information was added, particularly over the past winter. Frankly, 'information' does not necessarily provide 'knowledge' to the public or decision maker for the development of plan components. Some of the perceptions and frustrations I experienced with the development and refinement of the Assessment follow.

- As the original author of the Assessment, to use existing local and science information, to the extent immediately available was developed into the Assessment. The initial effort was intended to focus on local issues (habitat availability, distribution and persistence). From my experience, issues were driven both by habitat (species) diversity and ecology. The frequency, scale and intensity of local disturbance regimes {fire, flood, (native) pathogens, rot and interspecific competition) frame the foundation to species diversity and persistence.
- While uncomplicated in concept, others wanted more 'science' and 'detail', well beyond what I felt necessary to support the development of plan components. When seeking input from local, vetted IDF&G wildlife biologists, I was routinely pre-empted contact with them by that agency's representative on the IDT. As a result, I could not gather additional biological expertise to improve the draft Assessment. Though frustrated, as a contractor, I had no control over Forest involvement with the IDF&G.

- In the latest version of the Assessment, developed over the winter '13-14, much of the information included information irrelevant to supporting development of the vegetation (habitat) components. Further, much of biological information (such as presented for large predators and trapped species) was beyond the detail needed to support the Multiple Use section. Point being, a lot of time/energy/funds were expended for little gain. Further, the now-IDT Wildlife Biologist is being required to read all the science, pro- and con-, much of which will prove neither critical nor relevant to the decision-to-be-made.

Identifying Species of Conservation Concern – The first effort to identify SCCs has been convoluted. There was no specific format or lead to follow. Per the Directives, the vegetation plan components are expected to provide available and distributed habitats necessary to support species persistence within the Plan Area. Further, concerns not address by habitat attributes, such as ... disturbance/displacement (from critical habitats) ... invasive species (vegetation or disease) species ... and/or direct mortality issues will require species-specific wildlife plan components to abate the risk or stress. As a veteran wildlife biologist with over three decades of on-the-ground experience in the Plan Area, I felt very few (perhaps less than three species) truly fit the criteria to be selected as species of conservation concern.

The draft proposed list of SCC, late in coming and lengthy, took nearly nine months to develop. Development of candidate SCCs list was controlled by the Regional Office for approximately the last 16 months. Life history information (biology) was known and was available from work on the Boise NF and with the Interior Columbia River Basin Assessment. Other than local habitat availability and distribution (from modeling), there was little effort needed to support the development of the candidate species information for the Assessment. For reasons I do not understand, the habitat modelling was also slow to develop. The potential list was only presented to the Collaborative Group in April 05, 2014.

The IDF&G does not have species-specific population or trend data to support rationale for selecting any given species as an SCC. Only bighorn sheep population data (State or federal) is available within the Plan Area for any of the proposed SCCs. With exception of mountain quail, all other candidate SCCs are known to occur within the Plan Area in the last 15 years. Data used in the Assessment to support final determination neither presented data specific to the Plan Area, nor specific to Forest Service or federally managed lands. Without species-specific population, final determination as an SCC could be dependent solely on the availability, distribution and persistence of suitable habitat.

### **Technical**

As both an IDT member and a public participant, I sensed that biologists had personal biases that conflicted with the planning rule directives. I base this perception on individuals taking actions or positions based on personal interpretations or ignorance of the Directives. During the development of the candidate SCCs, Region, Forest and State biologists pursued a relatively large list of candidate SCCs. Reasons given for including species as candidates were varied. One biologist contended, based solely on the Interior Columbia Basin Assessment that populations of candidate species in the Plan Area were down. Another biologist stated concerns for connectivity for at least one species when there was no scientific evidence of downward population trends or indication of broken linkages (i.e., disconnected habitats/populations). Another biologist felt that



the more species identified as SCCs, the more analysis that would be necessary for proposed projects.

Specifically draft wildlife plan components were developed and presented in April '14, to:

- *Protect sensitive habitats included restricting all motorized traffic May 1- September 15.* The restriction dates were advanced from off-site research and lack of knowledge about local plant ecology. Further, local knowledge of seasonal elk habitats and movements was discounted in the April '13 version of the Assessment (...off-site science trumped local knowledge and expertise).
- *Prohibit over-snow vehicles in mountain goat winter range.* I was on the IDT when this was presented. I have thought much about this perceived issue. In my experience in the Plan Area, I had not heard of this issue prior to 2013. This issue had neither been noted Forest Plan monitoring reports nor identified or aired by the IDF&G as a management concern. The issue and resulting plan component was advanced based on: 1) A casual observation by a IDF&G biologist conducting elk populations monitoring and research; and 2) An informal conversation with a snowmobile enthusiast. When the issue was identified for the FPR, no data or habitat mapping had been developed. Also no on-site monitoring or contemporary science to indicate a prior issue had been presented. Further, integration with the Recreation Resource specialist and IDT, proposed motorized over-snow travel restrictions may have simply made the perceived issue a 'non-issue', and been resolved.
- *Assure a specific (percentage) of a specific forest type was retained for moose winter range.* The 1987 Nez Perce Forest Plan provided direction for old growth and moose winter range. There are a number of reasons why a wildlife plan component for moose would not be needed. First, the FPR direction is to manage vegetation/habitat within NRV/HRV, which provides a given availability of this forest type/habitat. Second, moose also winter in a variety of other shrub habitats and elevations where the "key" forest type/habitat is less evident. Third, direct mortality from native and illegal harvest likely has more impact on moose populations in the managed (timber production) landscape than moose winter range. Fourth concerns for moose populations should be directed more at access management than habitat. Again, local knowledge of moose habitats and movements was discounted in the April '13 version of the Assessment (...dated science trumped local knowledge and expertise).

Further indications of bias include:

- Re-mapping established Lynx Analysis Units (LAUs) to correct perceived 'errors' and standardize mapping efforts. The re-mapping effort was apparently done without regard to current direction in the Lynx Conservation and Assessment Strategy, indicating that LAUs were not needed in 'Secondary' habitat (as recognized for the Plan Area).
- Aversion to emphasizing elk winter habitat issues relative to specific plan components necessary (documented in science) to promote the availability and distribution of desired browse species.

### **Desired Conditions**

'Old Growth' - Throughout the collaboration process there have been a number requests for providing some specific level of old growth forest. These requests have come from the Regional

Office, some members of the public, and some Forest Service biologists. Again, HRV should dictate what ‘level’ of old forest would occur on the landscape. Given direction for managing: 1) Riparian forest habitats; 2) Dry forest habitats; and 3) Approximately 80% of the Plan Area will not be subjected to active timber production, there is no need to specify plan components relative to vegetation or habitat. I have probably field-verified (with documentation) more candidate old growth stands than anyone in northern Idaho. From that experience, retention of forested riparian areas alone will far exceed the availability and distribution for old growth standards identified in the 1987 Forest Plans.

‘Connectivity’ - Throughout the collaboration process there have been a number requests assure populations are genetically connected by suitable habitats. These requests have come from the members of the public and some Forest Service biologists. Again, HRV should dictate what ‘level’ of suitable habitats would be available and distributed on the landscape. Specifically, however, ‘connectivity’ needs to be addressed from two perspectives: First, what specific species (T&E, SCC or Multiple Use species) is there a concern for. Second, before one can address ‘connectivity’ for a specific species/group, ‘dis-connectivity’ should be defined (physical barrier?...distance?...isolated meta-populations?). Given a clear definition of the problem related to a specific species/group, then solutions can be explored and plan components developed to address specific issues. Simply espousing ‘connectivity’ offers no definition of, or solution to, the problem.

### **Recommendations**

- Assigning the Regional Wildlife Ecologist to document species-specific life histories, habitat assessment modeling, and population data documentation for candidate SCCs. The Regional Wildlife Ecologist solely (to my knowledge) drafted the SCC section of the Assessment. Applied across the Northern Region, this process provides for biological and administratively defensible consistency across jurisdictional boundaries. The draft SCC Assessment included proposed wildlife Plan Components that were not developed through the IDT.
- The Assessment should identify the key habitat attributes (documented by the modeling) features to support lynx and wolverine. Applied across the Northern Region, this process provides for biological and administratively defensible consistency across jurisdictional boundaries.
- Plan components should be developed by the IDT and not inserted in an Assessment. Rather, the Assessment should identify the key habitat attributes (documented by the modeling) and features that are essential in supporting a given species.
- Because the wildlife populations of the respective States belong to the citizens of that State, there is no real value to re-visiting existing Forest Service designated Sensitive Species lists. Rather, start the identification and triage of candidate SCCs using the respective states’ equivalent of Idaho’s Species of Greatest Conservation Need.
- For most non-game species, the States have little if any population data, other than presence/absence. As referenced in the Directives, rely upon population data, when available, generated within or specifically related to the Plan Area. Final determinations of SCCs will likely be based on the availability, distribution (connectivity for some species) and the in likelihood of ‘persistence in the Plan Area, over the life of the plan’.

- Provide direction to refine the need for ‘volume’ of science and relative applicability to the Plan Area. Rather than developing volumes of supporting science, it may be more important to seek, review and address opposing science.
- There should only be one IDT Wildlife Biologist...agency employed (preferred), committed to the process/IDT, and vetted in the landscape. Forest, State and Regional Wildlife Biologists should provide *ad hoc* support to the IDT biologist. Supporting biologists should help refine contemporary issues, and review/comment on opposing science.
- Involvement of Forest resource specialists, technicians and vetted local State and federal retirees with the IDT wildlife biologist should be actively solicited early and often. ‘Field’ knowledge should be given at least equal, if not exceed, the value of off-site science (that is science neither conducted in nor relevant to the Plan Area).
- Development of the draft Assessment should be the responsibility of the Forest or IDT Wildlife Biologist (again, vetted in the landscape; committed to the IDT process). Under the direction of a FPR IDT Leader, this should take less than 6 months and be in place prior to initiating formal contact with the Collaborative Group and the public. To reasons to support this: First, relevant habitat and species information and concerns should already be known and readily available for presentation in an Assessment. Second, without the time pressures of IDT and public meetings, the Wildlife Assessment could bring to both settings foundational information for review and feedback. A candidate list of SCCs developed by the Region, to include the life history information and habitat models, could be forwarded to the Forest for inclusion into the Assessment with details (habitat availability, distribution, stressors), specific to the Plan Area.

### **Going Forward**

To this point in the process, the IDT has dealt with inter-resource ‘integration’ to eliminate, clarify or reduce conflicts. That process has been beneficial for both IDT members and public. However, a more complicated and dedicated effort is needed in the next step --- developing the proposed action (plan). Rather than each IDT member/resource discipline focusing on their respective concerns, the IDT should address themes. Quite frankly, my personal/professional bias is to develop a plan which reduces conflicts associated with expansive road system impacts. Concepts for themes could state:

***“While supporting vegetation management and motorized recreational access, decrease the direct and cumulative adverse impacts on resource productivity (that is soil productivity, water quality, aquatic systems productivity, wildlife habitats productivity) by reducing the extent of the current permanent road system.”***

***“While providing for forest/habitat diversity, apply vegetation management in localized (vs the current practice of numerous, widely distributed harvest units), large patches (appropriate to the given landscape).”***

***“While supporting timber management, improve economic efficiency by relying more on temporary roads and single-use roads (that can be placed in storage following cultural treatments) and reducing the need for constructing and maintaining fewer permanent roads.”***

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Public support and acceptance are essential to implementing efficient and effective management of forest ecosystems and services. Active public participation and adherence to Planning Rule



and Directives offer hope in advancing public acceptance. My hope is that your time has not been wasted with the reading of these comments. Feel free to contact me directly (e- or cell) to discuss or seek clarification of my statements.

Enjoy this day!

**Most Respectfully,**

**Dennis E. Talbert**, Wildlife Biologist  
Nez Perce-Clearwater National Forest (retired)

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208.553.8466

Attachment: **Response to Wildlife Plan Components (April 29, 2014)**

April 29, 2014

**To: Forest Supervisor, Nezperce/Clearwater National Forests**

**Subject: Wildlife Plan Components**

**Attn: Forest Plan Revision IDT**

After attending the April 05, 2014, Collaborative Workshop, regarding wildlife plan components, I have a number of concerns with both content and presentation. Per FSH 1909.12.13, "Ecosystem integrity may be considered as the range of spatial and temporal scales". The principles guiding the forest plan revision process are grounded in understanding, within the plan, area the: a) Key ecosystem characteristics of terrestrial habitats (Appendix I) and ecological integrity (composition, structure, function, processes) and spatial/temporal distribution (availability, sustainability and connectivity); and b) Framework that guides resource management opportunities and practices.

The content and redundancy of the proposed April 5 wildlife plan components appear driven by personalities and bio-political biases. Such an approach pre-disposes opportunities to consider improvements to forest management practices that support ecological, social and economic considerations<sup>1</sup>.

There are essentially four components of wildlife management on National Forest lands: Habitat Availability; Disturbance/Displacement; Direct Mortality (predation, hunting, contaminants) and Invasive Plants/Disease. Forest Service primary responsibilities are to support native wildlife populations via assuring habitat availability, sustainability and connectivity. The Forest Service has also has responsibilities to address disturbance within or displacement from, critical habitats and exposure to invasive species. The State's responsibility is managing predation/hunting, with a supporting role to the Forest Service for the identification and management of critical habitats.

Having worked as a Wildlife Biologist and IDT member and of Forest Plan Revision, Desired Conditions are **integrated** strategic statements of goals and outcomes. The Planning Rule and Directives implied that Desired Vegetation Conditions described for uplands and riparian environments would incorporate features similar to historic conditions (structure/function/process, scale, distribution, sustainability, diversity and complexity). Habitats for native wildlife species are expected, therefore, to be available, sustainable and distributed throughout a given species' range within the plan area. Additional species-specific plan components are needed to address non-vegetative habitat elements (such as limiting human disturbance, timing of forest/range management practices, or invasive species/disease).

### **PLAN COMPONENTS**

Apparently, the Desired Vegetation Conditions were not reviewed by the IDT Biologists nor discussed with the IDT Silviculturist. If, in the development of the wildlife plan components presented April 5, review of the Desired Vegetation Conditions had been determined to insufficient, subsequent **integration** with and between IDT members specific to vegetation and wildlife habitat should have occurred. What

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<sup>1</sup> What is presented here is based on four decades of professional and personal experience as a Forest Service Wildlife Biologist in the Northern Rockies. I have nearly 40 years of on-the-ground experience, including both fire suppression and prescribed fire, in the Plan Area. I also have a working knowledge of local forest ecology, disturbance regimes (fire, flood, insect/disease, forest succession) and timber management.

was presented April 5, failed to acknowledge the development and content of Desired Vegetation Conditions that were developed specifically to assure habitat attributes were temporally and spatially available.

The following discusses, with rationale, suggested species-specific and Plan Components. References to Suggested Sept '13 version ( ), are wildlife PC's that were available to the IDT. 'New' are suggested additions to the Suggested Sept '13 version. Comments are mostly rebuttals to the April 5 version. (A suggested/revised version of the Plan Components is provided in Appendix I)

### Desired Conditions

- (Suggested Sept '13 version) Key ecosystem characteristics are spatially, temporally and structurally distributed to support reproduction, foraging, security, sheltering and territorial preferences.

**Comment:** In combination with the Vegetation/Habitat Assessment and Plan Components, the above Desired Condition statement encompasses the following 'plan component' presented in the April 5 Wildlife Plan Components:

Old forest; forest patches; structurally, complex habitat; stand characteristics; high-elevation grasslands; neotropical migratory birds; yew-wood thickets; mid-seral forest to develop late-seral forest habitat; snags and large, down dead trees actively recruited; patches of undisturbed habitat; large diameter snags and trees for replacement snags; mosaic of vertical and horizontal structure characteristic of old forest; clumpy leave tree distribution; slash and cull logs should be retained; forested stands should be retained within eagle nesting territories

- (new) A minimum of 70% of the potential snowshoe hare winter habitat is available within each LAU.

**Comment:** The "...*compelling reasons...*" to re-map or reconcile the Lynx Analysis Units within/between the two administrative units (Clearwater and Nez Perce National Forest), was unnecessary. The Forest Wildlife Biologist indicated the need "... *as part of Forest Plan Revision, mapped lynx habitat was revised to develop consistent mapping criteria across both Forests... based on Potential Vegetation Types<sup>2</sup>....*" Per Canada Lynx Conservation Assessment and Strategy (3rd edition), Canada lynx habitat on the Nez Perce/Clearwater National Forests is considered a "*Secondary/peripheral area*" and "*...is not necessary to delineate LAUs in secondary/peripheral areas.*" Rationale provided in the LCAS (3<sup>rd</sup> ed.) stated the conservation measures are intended to provide a:

*"...greater degree of flexibility for management activities in secondary/peripheral areas as compared with the core areas. The focus of management is on providing a mosaic of forest structure to support snowshoe hare prey resources for individual lynx that infrequently may move through or reside temporarily in the area. Landscape connectivity should be maintained to allow for lynx movement and dispersal.*

*"...mosaic of forest structure that includes dense early-successional coniferous and mixed-coniferous-deciduous stands, along with a component of mature multi-story conifer stands. Flexibility in the amounts and arrangement of various successional stages is acceptable, provided that a mosaic can be sustained. Vegetation treatments should be designed with consideration of historical landscape patterns and disturbance processes. Design timber harvest, planting, and*

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<sup>2</sup> I was the wildlife biologist who mapped the LAUs, per direction of the Forest Wildlife Biologist/Program Manager (D. Davis) for the Clearwater NF. Contrary to the current Forest Wildlife Biologist's assertion, neither LTAs nor VRUs were used. Consistent with standard forest stand-based resource data, habitat types were used to map subalpine fir, Engelmann spruce, and lodgepole pine (potential) vegetation types. The use of habitat types was and is, consistent with Lynx Conservation and Assessment Strategy (2007) and the Interagency Lynx Biology Team (2013).

*thinning to include some representation of young densely-stocked regenerating stands in the mosaic for snowshoe hare production areas.*

**Comment:** Though the Forest is neither required nor directed to recognize or use LAUs, this would be a biologically sound and reasonable management approach to specifically address the availability, distribution and sustainability of winter snowshoe hare habitat within lynx habitat.

- (Suggested Sept '13 version) In the Bitterroot Mountains Breaklands, preferred browse, less than 15 years old, occurs on 10 to 20% of winter range in each 5th HUC.  
**Comment:** IDT Wildlife Biologists changed this statement to 'within HRV'. While the ultimate goal is to achieve and/or maintain vegetation with HRV, current conditions on the winter range are well below desired conditions for availability and distribution of 'quality' browse forage. The proposed percentages should be within HRV.  
**Comment:** In Bitterroot Mountains Breaklands it is **essential** to recognize and emphasize the season and intensities to stimulate the establishment and productivity of critically import browse species. Biologists, land managers and line officers must recognize, accept and manage elk foraging habitats in this landscape that is consistent with historic disturbance regimes and plant ecology --- dry season fire!
- (Suggested Sept '13 version) Motorized public access is managed to limit displacement from seasonally critical habitats, particularly birthing/nesting habitats.
- (Suggested Sept '13 version) Rare habitat elements (such as wet, fractured rock outcrops, calcareous substrates, talus slopes, isolated gorges and narrow canyons, and riverside sandbars) remain available for wildlife habitation.

### Objectives

- (Suggested Sept '13 version) To support the sustainability and distribution of lynx prey within the plan period, promote the development of 15,000 acres of snowshoe hare winter habitat.

### Standards

- (new) To analyze the availability and distribution of snowshoe hare winter habitat, recognized lynx analysis units will be used.

**Comment:**

### Guidelines

- (Suggested Sept '13 version) To promote germination and resprouting of preferred winter elk browse species, develop prescribed burning prescriptions for ignition between July 15 and October 15.  
**Comment:** Timing of prescribed burns is critical to achieving the desired response of quality browse shrubs, particularly redstem ceanothus. Further, moist season burns can only treat limited areas of southerly aspects.
- (Suggested Sept '13 revised April '14) To provide for habitat use and security, the need for, and use of permanent roads, vegetation management practices should occur in large patches (typically exceeding 250 acres, with up to 1000 acres preferred)  
**Comment:** The opportunity to assure elk security is available, sustainable, distributed across the landscape is to implement timber harvest in localized, large patches (typically several hundred acres or larger). The rationale to support this argument is: 1) Reduce the re-entry schedule into any given area (patch) to 2-3x's/timber rotation (typically 100-150 yr, depending on timber type and local fire regime); 2) Reduce the need/extent for permanent roads by relying on more temporary roads and/or placing system roads into 'intermittent storage/use'. Localizing timber harvest into large areas also provides for larger patches of undisturbed habitat in nearby landscape. Reducing the need for an extensive permanent (open) road system increases, by default, the availability of secure elk habitats. Applying this

management strategy has a number of ecologic, habitat, infrastructure and economic benefits, beyond accommodating elk and elk habitat concerns.

- (Suggested Sept '13 version) To preserve habitat when closing mines or caves that are known or suspected to be occupied by bats, install bat-friendly closures.

**Comment:** In addition installing bat friendly closures when closing mines or caves, ten additional bat habitat and management direction was included in the Apr 5 wildlife PCs:

1. Buildings shall be inspected prior to removal or demolition ... buildings shall not be disturbed until bats have left for the season or have been removed.
2. Caves used as Townsend's big-eared bat roosts shall be closed to recreational use when bats are present, using signs, road closures, and bat gates.
3. Insecticide use should be avoided in bat nursery colonies.
4. Caves, mines, and abandoned bridges and buildings should be surveyed for the presence of roosting bats before permitting recreational use and conducting management activities.
5. ...roosting bats should be protected from disturbance or destruction.
6. Buffers should be used to protect sites to maintain microclimate conditions and drainage patterns needed by bats.
7. Construction ... should not cause siltation, slumping, or water run-off to enter cave habitats or alter other roosting structures.
8. Human activities around known bat roosts should be restricted using road management, signs, public education, and bat gates.
9. Within XX years of Plan approval, partner with State and federal agencies, tribes, or other organizations to survey and map bat hibernacula, roosting sites, and other special features, and numbers of bats associated with them.
10. Provide a management prescription to reduce potential impacts for bat summer roosts and hibernacula.

No support noted for most of these prohibitions in the Assessment. While conserving bats and bat habitat is needed, whenever/wherever feasible, we need to realize limitations to recreational uses, construction activities beyond hibernacula needs, should be supported in the Assessment. Much of what is described above would be more appropriate as informational ('management prescription') to Line Officers and Resource Managers, and not prescriptive in the Forest Plan.

- (new) To protect occupied habitat mountain quail habitat and populations, avoid prescribed fire projects during nesting season.

### **Suitability**

- (Suggested Sept '13 version) Bighorn sheep core herd home ranges are not suitable for domestic sheep or goat grazing, trailing and recreational (goat) packing
- (Suggested Sept '13 version) Motorized over-snow travel beyond designated routes is not suitable in elk and mountain goat winter habitats.

**Comment:** As also described for lynx habitat in the plan area, this allows "...greater degree of flexibility for management activities in secondary/peripheral areas as compared with the core areas." Per statements from members of motorized winter recreationists, they contend this not an issue. In addition, particularly on elk/deer winter range, motorized travel could reduce direct big game mortalities by aiding in predator control.

### **Other Management Direction**

- (Suggested Sept '13 version) Wolverine management direction, when developed, will be incorporated into the revised Forest Plan.



- (Suggested Sept '13 version) To achieve the maximum browse response from prescribed fire, management practices, such as slashing, timber harvest or prescribed fire, could be needed to provide suitable fuel conditions. Prescribed fire on elk winter is appropriate prior to July 15 to promote resprouting in grassland/shrubland habitats, achieve other management objectives, or establish fuel breaks in preparation post-July 15 prescribed fire of achieve browse.
- (Suggested Sept '13; revised April '14) To reduce disturbance in suitable elk calving areas, motorized access should be limited between May 1 and July 10. Determinations, in consultation with the IDF&G, should be made at the project level and based on local site conditions.
  - Comment:** The Apr 5 version indicates May 1 to September 15. The above adjusts the dates to one month after the peak of the calving season. Rationale for July 10, are several: First, the peak of calving is the first week in June. By late June, cows and calves have rejoined the herd. Second, calving areas are associated with early grass green-up (supports lactation). These sites, because they green-up and mature sooner than more moist/cooler summer range habitats, the grass cures and less desired for foraging. Third, because elk are free-ranging herd animals, they tend to move on to 'greener pastures' and thus, avoid over-grazing. Fourth, elk prefer 'greener pastures' when and where they are available. As the summer progresses, elk will move to seek out green forages. These factors are neither noted in the Assessment nor in the Best Available Science.
  - Comment:** Episodic/periodic human activities (the mere sight of humans and motorized noise) can displace elk short distances in wild habitats. They will, however, not typically relocate to lower quality habitats unless human disturbance is chronic. Further, predators will focus on significant calving areas for abundant and easy prey opportunities. Likely the impact of chronic predation due direct mortality and displacement of cows/calves to lower quality habitats is greater than that of human disturbance causing displacement. Again, motorized travel could reduce direct big game mortalities by aiding in predator control.
  - Comment:** Calving areas vary in the Plan Area, particularly in the Clearwater Basin. Local conditions, such as on-site forest succession, plant community stability, topography make it is impractical to develop uniform criteria for identifying elk calving areas. For example, in spite of criteria to specifically identify the Glover Ridge elk calving area, the recent mapping effort (in which I participated) was unsuccessful. This ridge is a historically known and important calving area. Therefore, the identification of calving areas would best be developed by local knowledge and conditions, rather than a modelling effort. Further, need for and determination for potential access restrictions should also be made on local site conditions and at the project level. In consultation with Forest and State biologist and the local Forest Service Line Officer, local circumstances could be more accurately defined and need for management actions more clearly implemented.
- (Apr 5 Version; modified) To reduce motorized disturbance to elk during severe winter conditions, access may be locally restricted or re-routed.
  - Comment:** It should be understood that either agency could recommend restricting motorized access. In general this should not be an issue. A decision to proceed should also seek support from local snowmobile clubs. In the winter '96-'97, I was actively involved with the Forest Service Rec/Trails managers to seek understanding and support for closing a section of groomed trail in the Orogrande Cr watershed (North Fork Clearwater drainage). The proposal to review the situation was made by the Forest Service Trails program. If not the FS take the initiative, the F&G can and should take the initiative to request the FS implement administrative closures. Major river canyons where elk are forced to the lowest elevations are the likely locations where action may be necessary to restrict or re-route over-snow motorized traffic.

- (Suggested Sept '13 version) To reduce management conflicts on roads closed to the public during the general big game season, limit administrative use to emergency, law enforcement or uncontrollable circumstances.

**Comment:** The support for this was not developed in either the Wildlife or Recreation Assessments. This guide was developed to limit disturbance by Forest Service activities, to hunters while hunting. This is intended to accommodate the hunter that leaves the vehicle before Forest Service business hours and then is interrupted during the hunt by 'insensitive' agency activities accessing the closed road he just hiked/biked/horsebacked to hunt in solitude. Development for the support of this guide should be provided in the Recreation Assessment, as related to quality of the hunting experience, specifically solitude and opportunity for success. This would not preclude active timber operations. Timber harvest access would signed/designated either to be open or closed to motorized public traffic, with the hunter making their choice to enter or not.

- (Suggested Sept '13 version) To limit or avoid disturbances to rare/unique habitats identify mitigations, avoidance or barriers (such as fencing) at the project level.
- (Suggested Sept '13 version) To protect active peregrine falcon and eagle nests, identify mitigations at the project level.

**Comment:** *Goshawk nest sites will be protected and post-fledgling areas should be managed...* This is not supported in the Assessment as either a SCC or MU species. Regardless, goshawks have a relatively low fidelity to the same nest in successive breeding seasons. Because of nest predation by ravens, owls, hawks, raccoon, pine marten, fisher..., they often relocate to a new nest tree the next season. Locating an active nest in a 4000-6,000 acre breeding territory that is dominated by dense forest is difficult. When this has occurred, activities can be locally relocate to avoid direct disturbance to the nest. Also, I have personally observed active nesting within 50 yards of a major Forest Service Rd. It is only rare that an active nest is discovered in an active timber sale. What we can promote for post-fledgling areas is larger patches of undisturbed forest, available, well distributed across the forest landscape. Again, this should be addressed with patch size in the Vegetation Desired Conditions.

**Comment:** *Forested stands should be retained within eagle nesting territories...avoid impacts to bald eagles on known occupied roost sites, including known winter communal roost areas ... Management activities should not result in the loss of existing bald eagle nest trees or established roost sites ---* This is addressed, by default, in the PC element, above, and in the Vegetation Desired Conditions. A newly discovered active bald eagle nest (April '14) on the Middle Fork Clearwater River is in full view and within 300' of US Hwy 12. Of three other bald eagle nests I am personally aware of, all are within 1/8 mile of US Hwy 12 or a major county road.

### ***Management Strategies***

Reduce the adverse impacts to wildlife habitats, populations and loss of security associated with and permanent road system by:

- Managing forest vegetation in larger patches when creating young forest patches and/or promoting the development or retention of older forest patches;
- Increasing reliance on temporary roads for timber harvest access;
- Obliterating temporary roads upon completion of management activities within a given patch;
- Physically closing roads not needed to manage the larger patch in the next several decades to all motorized traffic;
- Limiting motorized re-entry into large patches to coincide with forest cultural needs (thinning, final harvest...). Generally, re-entry into the interior large patches is expected to be 3 to 5 decades following the last cultural treatment.

### ***Partnership Opportunities***

Rocky Mountain Elk Foundation  
Rocky Mountain Bighorn Society  
Idaho Department of Fish and Game  
Nez Perce Tribe

### ***Coordination Opportunities***

NFMA efforts, well distributed in both roaded and unroaded landscapes, would direct resource managers to jointly evaluate a landscape, such as a given 5<sup>th</sup> HUC. Compliance with or departures from multiple resource desired conditions would be used to identify management opportunities/needs, document priorities and propose projects.

## **TEPC SPECIES**

The following discusses species- or group-specific elements addressed in the April 5 Wildlife PCs. The information below debates or supplements those Wildlife PCs.

### **Canada Lynx**

The outcome of mapping for the Forest Plan Revision, was inconsistent with the LCAS as indicated by imposing HUC delineations over that of the approximate “...*area needed to support a female lynx year-round...*”. As a result both forest types and landscapes that are not considered currently or potentially suitable lynx habitat were included in the LAUs. This resulted in a gross-misrepresentation within any given LAU and unnecessarily complicates analyses addressing the availability, distribution and sustainability of lynx habitat. Further, it appears some potential lynx habitat in the Pot Mountain area of the North Fork Clearwater drainage was omitted.

Habitat features depicted for lynx included denning and snowshoe hare. Denning habitat is not practical to map. Simply a pile of large wood, such as occur with tree fall, or a cavity under a tree can serve as a suitable denning site. A female lynx does not need ‘acres’ of denning habitat to be successful. Denning opportunities near thick forest cover with an abundant population of snowshoe hares would likely be preferred.

Regarding snowshoe hare, the recognized critical season for lynx foraging is the availability of snowshoe hare and snowshoe hare **winter habitat**. Typically, snowshoe hare winter habitat is associated with dense lodgepole pine reproduction and/or subalpine/spruce forest conditions where limbs reach the snow through the winter. (It is my understanding that hares select cover (limbs to the snow) or the availability of forage.) The survival of hares, given winter predation by owls and lynx, relies on dense cover. Further, sites where conifer cover is sufficiently dense to meet the hiding cover conditions, is typically associated with gentle (<50% slopes) on northerly (moist) aspects (drier ridges and southerly slopes are not inherently productive enough to provide the dense vegetation needed for snowshoe hare winter hiding cover).

### **Wolverine**

The map developed by the Forest Wildlife Biologist to depict “...*persistence of a snowpack into late spring ...*” for wolverine denning exaggerated the coverage of snow across much of the Forest. Further, April 1 does not constitute ‘late spring’. From the literature, persistent snow cover thru May 15, is the critical time period. Also, from reading the Assessment, north facing cirque basins were typically associated with persistent snow cover through May 15. The mapping of persistent snow cover needs to be

adjusted to reflect those sites with the highest denning potential, based on persistent snow cover through May 15. The most critical conditions to long-term habitat suitability should be defined by the availability of persistent snow cover during low snow years (2014, is not a low snow year!).

The Assessment also needs to reflect the research being done in central Idaho evaluating the potential impacts between winter recreation and wolverine dispersal and denning. Results of this research may be useful in developing wolverine-specific PCs, even if only guidelines.

### **SPECIES OF CONSERVATION CONCERN (SCC)**

Some biologists believe that all wildlife should be monitored for population trends and/or habitat. While desired by some, and some agencies, cost relative to benefit is likely prohibitive. Further, as wildlife species 'belong to the State', responsibilities to fund and conduct population monitoring should remain with the State (and not the Forest Service). Desired conditions are expected to direct and guide the dominant characteristics of ecological integrity and spatial/temporal distribution (i.e., habitat for all native wildlife species) to persist within historic conditions for decades beyond the planning period. Per "*mandatory requirements*" in the Plan Rule Directives, potential SCCs must be: 1) Native in the plan area with the last 10-15 years; and 2) "*best available scientific information indicates substantial concern about the species' capability to persist over the long-term in the plan area.*" Per guidance in the Directives, the list of proposed SCCs is based local conservation concern due to:

- Populations or habitat from stressors on and off the plan area;
- Declining trends in populations or habitats;
- Restricted ranges;
- Low population numbers or restricted habitat within the plan area.

The lack of population data within the plan area for nearly all the proposed/candidate SCCs, does not allow the line officer to support a decision to select/reject a proposed/candidate SCC. The SCC Assessment referenced trends in habitats and populations described by Wisdom, in the Interior Columbia River Basin Assessment. Wisdom's information was neither specific to National Forest lands nor the Plan Area. Therefore, the only information available to the Line Officer to make final determinations on SCCs remains the availability, distribution and persistence of habitat within the plan area. To make species by species determinations, it will be necessary to cross-check current habitat availability and distribution with current vegetation distribution and sustainability (using SIMPPLE modeling). If existing and projected trends demonstrate habitat is secure in the plan area through and beyond the planning period, a species should be rejected as an SCC. Based on the current availability and distribution of suitable habitat in the plan area, the question the line officer will have to ask for each potential SCC: **Is there "...substantial concern ... to persist over the long-term in the plan area."?**

The following table addresses suggested Plan Components presented or alluded to in the SCC Assessment. It appears the suggested Plan Components were neither considered nor integrated with the Vegetation/Habitat Assessment and Desired Conditions. I would suggest removing the suggest Plan Components from the SCC Assessment segment. The SCC Assessment should present: 1) the biological needs; and 2) identify those key ecosystem characteristics necessary to support each potential SCC. Discussing only the biology and relevant key ecosystem characteristics would avoid duplicate or conflicting statements with other components of the wildlife Assessment. Further, removal of the suggestions from the SCC Assessment would promote an integration effort. Inter-resource and IDT integration is pivotal to assuring key ecosystem characteristics are included with the Vegetation Assessment and Desired Vegetation/Habitat Conditions and PCs.

**Comments re: Suggested Species of Conservation Concern Plan Components**

Suggested Plan Component	...to Benefit What Potential SCC(s)?	Comments
<b>Accounted for:</b> Old forest management, which includes old-growth conditions appropriate for cover-types,	White-headed woodpecker Pygmy nuthatch Flammulated Owl Fisher	Do not include PC as written; Element addressed in Veg PC's
<b>Accounted for:</b> To protect and restore ponderosa pine and white pine, reduce shade-tolerant forests.	...uncertain how this specifically relates to potential SCCs	Do not include PC as written; Element addressed in Veg PC's
<b>Accounted for:</b> To reduce the risk of stand-replacing fires in late-seral ponderosa pine reduce fuel loads.	White-headed woodpecker Pygmy nuthatch Flammulated Owl	Do not include PC as written; Element addressed in Veg PC's
<b>Accounted for:</b> To accelerate development of late seral stages, where needed, manipulate mid-seral forests	White-headed woodpecker Pygmy nuthatch Flammulated Owl Fisher	Do not include PC as written; Element addressed in Veg PC's
<b>Accounted for:</b> Snag and down log management, which includes retention and long-term management	Bats Fisher	Do not include PC as written; Element addressed in Veg PC's
<b>Accounted for:</b> Protect and restore riparian habitats	Bats Fisher Coeur d'Alene Salamander	Do not include PC as written; Directly/indirectly addressed in Veg and Aquatic Resources PC's
<b>Accounted for:</b> Protection of bat maternity and winter roosts	Bats	Do not include PC as written; Snag retention addressed in Veg Section; closing mines to human disturbance addressed in Wildlife PCs
<b>Accounted for:</b> To "actively control the potential for disease transmission between bighorns and domestic livestock (Wisdom)", exclude domestic sheep and goats from bighorn sheep habitats.	Bighorn sheep	Specific Wildlife PC was previously developed to conclude that domestic sheep/goat grazing is 'unsuitable' in bighorn sheep range
<b>Accounted for:</b> To provide microhabitat and microclimate conditions retain patches of undisturbed habitat in vegetation management areas	...uncertain how this specifically relates to potential SCCs	Do not include PC as written; Directly/indirectly addressed in Veg, Aquatic Resources and Soils PCs
<b>Add:</b> To reduce the extent of non-native invasive noxious plants and animals, reduce invasion vectors (particularly motorized access), and eradicate or contain the spread of established populations.	Mountain Quail Bighorn Sheep	Address PC in Invasive Plants PCs; also include with 'Other Management Direction'
<b>Accounted for:</b> To eliminate reduce barriers to wildlife dispersal, reduce habitat fragmentation, and improve habitat security, decommission un-needed roads	...uncertain how this specifically relates to potential SCCs	Do not include PC as written; Addressed in Infrastructure and Watershed PC's
<b>Accounted for:</b> To limit or avoid disturbances to unique wildlife habitats such as wet, fractured rock outcrops, calcareous substrates, talus slopes, isolated gorges and narrow canyons, and riverside sandbars.	...provides for habitat diversity related to rare-element habitats.	Included in Wildlife PC with 'Other Management Direction'
<b>Add:</b> To reduce the extent of short- and long-term habitat disturbance, apply vegetation management practices of 'retention' and 'disturbance' appropriate to the historic disturbance scales and intensities.	Fisher (directly) --- per Wisdom... "large, contiguous blocks of forest cover ...."	Address PC in Veg PC's



From the habitat mapping developed by the Regional Office and IDT biologists for a number of potential SCCs, it is reasonable to assume that the availability, distribution and sustainability (persistence) of their respective habitats will, in fact, be secure in the plan area. For other species, such as the bats and Coeur d'Alene salamander, desired conditions described for Vegetation need to demonstrate that key vegetative characteristics for habitat availability, sustainability and distribution will assure habitat is secure in the plan area.

Based on the habitat and species information presented to date, I contend only two species meet SCC requirements: Bighorn Sheep and Mountain Quail. Both species should be selected based on threats of invasive species (bighorn sheep due to disease; mountain quail due to unknown factors but could be related to competition with non-native birds and/or invasive plants). With respect to other key species (that is focal species) a list of species with rationale is included in the Appendix III.

## MULTIPLE USE SPECIES

### Elk Security

Within the Northern Region of the Forest Service, concerns re: the loss/retention of elk security areas began in the mid-1970's with evolving results from the Montana Elk/Logging Study (Lyon, et. al.) and the Elk Summer Range Habitat Management Guidelines for Northern Idaho (1978?). In the era of active industrial-style timber harvest ('60's-early 90's), extensive harvest, accompanied by an intensive constructed road network was displacing elk from preferred habitats. During this era, extensive clearcutting, typically in 40 acre 'blocks', was the common timber harvest method. As both extensive loss of cover and road systems were extended, elk became more vulnerable to both direct disturbance and hunting mortality. The definition and use of the concept of security area was developed to control motorized access such that elk would have some areas to escape to during hunting season.

Leege (No. Id. Elk Summer Habitat Guides) defined security areas (as currently defined: >250 ac, >60% hiding cover, >1/2 mi from an open road. Hillis, reinforced essentially the same definition, known as the 'Hillis Paradigm'. While the definition of security areas and the application of the No. Id. Elk Summer Habitat Guides accounted for effects associated with roads through openings and cover, landscape features, particularly rolling and steep terrain, were not practical to model. The removal and regrowth of forest vegetation, was accounted for modelling opening/cover indices, did not directly address how rapidly vegetation would recover hiding cover conditions.

The Apr 5 Wildlife PC state: *Thirty percent of X-size analysis units (e.g., 5th code HUC) should be maintained for elk security to benefit elk and other wildlife. Larger security areas, to be determined at the project level, should be provided in critical habitat (e.g., elk calving areas) or where elk management is a high priority as determined through coordination with IDFG. Wildlife security areas are described as at least 250 acres in size and are located more than 0.5 miles away from open motorized routes; however, the size and distribution of security areas can be modified by terrain, topography, and vegetative condition.*

**Comment:** Both professionally and personally I have given much thought to the concept and need a elk security. From the perspectives of both a biologist and former elk hunter, I disagree with the PC, as depicted, for the following reasons. First, I am not aware of any Best Available Science that supports 30% of X-size analysis unit. The concept of security areas was derived specifically to address disturbances to elk that were associated with motorized access on managed timber lands. With over 80% of the Plan Area unsuitable for timber management, and essentially 'secure' in terms of elk habitat, is there a need for such a broad statement in support of elk security? Second, assuming this PC is applied on a large areas, such as a 5<sup>th</sup> Code HUC, elk are then relegated to the most remote terrain and likely into rugged landscapes, often of lesser habitat quality and terrain than elk would

typically prefer (ANY seasoned elk hunter knows that elk quickly seek the most remote, steep or undisturbed areas within just a few hours of the opening of general hunting season, regardless of the quality of habitat available to them.). With respect to hunting opportunity/diversity, when elk security is largely in rugged terrain, non-motorized (foot and horse) hunters are relegated to the more severe hunting opportunities or directly compete with motorized hunters on easy terrain. Third, if security areas distributed in smaller analysis units, such as 6<sup>th</sup>-7<sup>th</sup> Code HUC, provide opportunities for elk to remain in quality habitats. Regardless, from both elk and hunter perspective, elk security guides would be more suitable when elk can remain in quality habitats.

**Comment:** Since the mid-1990's, four significant changes in forest management practices have occurred in the Plan Area. The 1) Rate of regeneration harvest (formerly clearcutting) declined and transitioned to include; 2) Retention of riparian reserve (riparian habitat conservation areas...) became standard practices; 3) Roadless area designations confined the expansion of timber harvesting from entering additional preferred elk habitats; 4) The rate construction and extent of accompanying permanent roads declined to 'incidental' occurrences; and 5) Unneeded roads were physically and/or administratively removed from the landscape. None of this information is addressed or accounted for in the 'Best Available Science'.

**Comment:** Security areas, well-distributed throughout the suitable timber management lands, are essential to providing elk to quality foraging/hiding habitats and solitude for hunter on foot. The combination of more trees (and clumps of trees) being retained in harvest units and riparian areas and reduction in permanent road system has reduced the pressures of displacement and vulnerability on elk. As timber harvest has become more 'refined', disturbance to elk from preferred habitats and need for extensive security areas has diminished. Regardless of future timber harvest practices in 'suitable timber management areas', it is unlikely that timber harvest and riparian conservation practices will be altered to the extent of again threatening elk security across the landscape. Providing for these conditions is the foundation to support managing forest landscapes in large patches (as described above addressing the specific Plan Components).

**Comment:** Hunting quality and opportunity should be addressed as related to elk security. Providing well-distributed areas secure for elk habitation also provides a distribution of hunting opportunities. The IDT should recognize that National Forest offers a variety of hunting conditions for both motorized and non-motorized hunters. However, only in the timber managed lands does the Forest offer opportunities for those hunters without ATV or horses, to pursue quality hunting opportunities in lands managed for timber production. While adjoining State and private industrial forest lands are available for elk hunting, motorized access dominates hunting strategies and tactics. With over 80% of the Plan Area in a 'roadless' condition, opportunities for both livestock supported and foot-hunters abound in back-country settings. Only in the timber managed landscapes, does a foot-hunter have an opportunity to avoid competition from both motorized and livestock-supported hunters.

### **Moose**

From IDFG (and the MU assessment): *Moose in the planning area exhibit two life strategies. Some moose populations in the Planning Area are found in climax vegetative cover. Summer feeding habits tend to be nocturnal in open, wet meadows, while diurnal activity is limited to adjacent forested areas. ...Winter habitat selection favors subalpine fir and Pacific yew plant communities....Other moose populations in the Planning Area are adapted to seral plant communities, except in winter.*

**Comment:** Moose eat and travel just about where and when they want. The availability of mountain maple, scouler willow, Pacific yewwood, red oosier dogwood and moist site vegetation are selected in the summer. In the winter the availability scouler willow, Pacific yewwood, mountain maple, and red oosier dogwood remain primary forages. Moose will forage where these species are available, regardless of forest cover type. The advantage of Grand fir/Pacific yewwood, in addition to foraging, is the protection from deep snow and cold provided by dense conifer canopy. Subalpine fir habitats are not selected in the winter. Shrubs in this environment are generally low (below snow depth); the preferred shrub forages do not typically occur in subalpine landscapes. Because moose are singles or

small family groups, they do not need to travel far to forage and will stay in one area from weeks, browsing on whatever is available.

**Comment:** Moose eat and travel just about where and when they want. They are not restricted by daylight or the availability of adjacent forest. From IDFG (and the MU assessment): Logging may reduce habitat for these populations... These populations may be expanding in areas where extensive habitat manipulation has resulted in early seral brush fields. Winter ranges appear to be timbered areas where yew-wood thickets are several hundred years old. Creating openings in these timber stands through logging may impact moose by eliminating these yew-wood thickets.

**Comment:** Because of the difficulty in sightability, the State does not collect moose population data. Therefore, there is not support to indicate that the creation of openings (logging) may reduce habitat or populations. Rather, creating openings should diversify foraging opportunities.

**Comment:** With respect to populations, the vulnerability of moose to both native and illegal harvest is exacerbated by an extensive network of roads accessible to motorized vehicle. Managing forest landscapes in larger patches and reducing the need for an extensive open/active permanent road system would decrease the vulnerability of moose to uncontrolled hunting mortality.

### **Black Bear**

The Assessment needs to acknowledge that mountain ash and cascara are notable berry forages in the late summer and fall.

### **ADDITIONAL COMMENTS**

The following are references the April 5, '13 (*highlighted*) draft wildlife plan components related to:

- ***Canada lynx habitat will be managed per the Northern Rocky Mountains Lynx Direction (2007) and ROD...*** Per the ESA and USF S management responsibilities, this is understood. No need to duplicate FS Direction in the PC's
- ***...noxious weeds and habitat*** --- Addressed in the invasive plants section;
- ***...wildlife movement within and between disparate National Forest System (NFS) land parcels*** --- Not supported in the Assessments for TEPC, SCC or MU species; management practices to adjust habitats on State or private lands are beyond management control of Forest Service
- ***...neotropical and other migratory birds*** --- Not supported in Assessments; not specific to TEPC, SCCs or MU species. Considerations already accommodated in Vegetation/Habitat Desired Conditions
- ***Habitat supports ... (IDFG) species management plan objectives...supporting F&G objectives in the Forest Plan, the wildlife PC for direction/guides for specific species --- elk, fisher, mountain quail, peregrine falcon/eagles, as well as generalized habitats (young-mid-mature-old-riparian forest habitats), recognition of critical habitats and intentions to control disturbance....*** --- While the State owns the animals and controls population management practices, there are no provisions specific to habitat management. The IDFG understands the goal to manage habitats within the NRV, and are not expected to propose vegetation management activities to deviate from that goal. Rather than including this statement in the Apr 5 PC, this should be more a mission statement/co-operative agreement between FS/F&G to participate in the Plan development (and not relevant as a plan component)
- ***Early seral cottonwood/willow stands*** --- Not supported in Assessment; not associated with TEPC, SCCs or MU species.

- ***...restoration of natural stream flows and riparian vegetation through control of livestock grazing, and through restrictions on roads and motorized trails in RCAs.***--- Not supported in wildlife Assessments; addressed in Aquatics Assessments
- ***All new fencing and fence repairs shall meet big game permeable*** --- Not supported in the Assessment. While barbed wire fences can entangle big game, there are few barbed wire fences on the Forest and I am not aware of a noticeable problem with big game mortality, particularly in relation to vehicle traffic, poaching and predation. As for reference Montana, we do not have antelope, which are certainly affected by impermeable fencing.
- ***... bark beetle activity (≥500 acres) provide foraging habitat for American three-toed woodpecker*** – Supported in the Assessment, however, these conditions will likely occur only in lodge pole pine stands in the Subalpine landscape. Means to manage for patches must rely on creating young stands in patches ≥500 acre, to eventually evolve into stands supporting bark beetle activity. Two caveats to this: Will the three-toed woodpecker status prevail as an SCC?...and, because most of the subalpine landscape is in unroaded landscapes, would not patches of beetle activity be present with sustained presence in the landscape through time and space?
- ***Activities generating loud or continuous noise ...shall be restricted ...*** --- Not supported in the Assessment and be specific to an TEPC, SCC or MU species. If not, this should not be a PC
- ***Closed or abandoned roads should be ... wildlife security. Roads should be obliterated or use restricted after ... management activities*** --- Can be addressed several ways: elk security... watershed management practices... patch size... infrastructure management.
- ***Road construction should be avoided within late-seral forests*** --- Need support in Assessments; neither TEPC, SCC nor MU species-specific. Again, address by managing large patches (as suggested for fisher...) to reduce the need for an extensive permanent, open road system.
- ***...biennially update appropriate NRIS database modules for TEPC species and SCC and their habitats to incorporate the latest field data.*** --- This is a WL Program Manager responsibility. This should be repositioned to ‘monitoring’ discussion later in the FPR process and not a PC. Species-specificity and understanding of how to be used to monitor Forest Plan implementation/effectiveness and recommend changes related to management practices (scale, frequency, distribution...) need to be defined... Do need to collect data-for-data sake... need to focus on achieving the Desired Conditions as depicted in the PCs.
- ***...develop guidelines for methods and criteria for the Forest-wide evaluation of habitats for wildlife species of interest, TEPC species, and SCC.... identify and/or develop habitat capability models*** --- The current species-specific models, habitat descriptions comparisons with Desired Vegetation Conditions should be the metrics to address availability, distribution and persistence of habitats in a given landscape/project area. The models may be updated with new science, however, no need to re-invent the wheel.
- ***... develop a mid-scale (forest) assessment of landscape departure patterns from historic succession-disturbance regimes*** --- Not supported in wildlife Assessments. However, this should be placed in the ‘Coordination Opportunities’ section at the Draft Forest Plan stage. This effort is essentially was and NFMA effort should address, but is not a wildlife-driven process. This effort would more appropriately be driven by the Forest Line Officers to direct all resource management entities to evaluate a landscape, such as a given 5<sup>th</sup> HUC, to assessment departures from Desired Conditions, identify management opportunities/needs, document priorities and propose projects.
- ***... identify mid-seral forests in the lower montane community ... that could be brought to***



*late-seral conditions to compensate for late-seral lower montane forests that been eliminated in these areas...identify representative stands of old forests for retention and mid-successional stands for development into old-forest stands. Priority ... to large blocks having high interior-to-edge ratios and few large openings.... integrated long-term strategy to re-pattern forest and forest-range landscape mosaics at the watershed scale using mid-scale (forest) strategies --- (???)* Again, this would be a joint Vegetation/Habitat assessment best performed using an NFMA (*integrated!!!!*) analysis.

- *... map younger cottonwood willow stands for protection and development of old forest conditions.* --- Not supported in the wildlife assessments; neither TEPC, SCC nor MU species-specific
- *... develop guidelines for snag recruitment in unburned forests.* --- Not supported in the wildlife assessments; TEPC, SCC nor MU species-specific; size/amount of snag retention, distribution and sustainability within stands and across the landscape is addressed in the Veg/Habitat Desired Conditions. Operationally this would likely be expensive, perhaps, hazardous to ‘recruit’ snags. Frankly, with the level of snag retention during all vegetation management activities, in addition to the snags retained in riparian habitats ... AND, the snags available in across the landscape within mid-seral and older forest stands, there is no need to recruit additional snags. Again, if there was a species-specific need for a certain size/density of snags, then those criteria should be included in the Veg/Habitat Desired Conditions and not a separate WL PC.
- *...highest priority for retention and restoration of boreal owl habitat* --- Not supported in wildlife Assessments. However, this should be placed in the ‘Coordination Opportunities’ section at the Draft Forest Plan stage. This effort is essentially was and NFMA effort should address, but is not a wildlife-driven process. This effort would more appropriately be driven by the Forest Line Officers to direct all resource management entities to evaluate a landscape, such as a given 5<sup>th</sup> HUC, to assessment departures from Desired Conditions, identify management opportunities/needs, document priorities and propose projects.
- *... identify and map potential species strongholds for the long-term management of fisher -* -- Not supported in wildlife Assessments. However, this should be placed in the ‘Coordination Opportunities’ section at the Draft Forest Plan stage. This effort is essentially was and NFMA effort should address, but is not a wildlife-driven process. This effort would more appropriately be driven by the Forest Line Officers to direct all resource management entities to evaluate a landscape, such as a given 5<sup>th</sup> HUC, to assessment departures from Desired Conditions, identify management opportunities/needs, document priorities and propose projects.

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**APPENDIX I – Suggested Key Ecosystem Characteristics**

**Key Ecosystem Characteristics of Terrestrial Habitats**

Key Ecosystem Characteristics	Wildlife Groups			
	Threatened, Endangered, Proposed & Candidate Species	Potential Species of Conservation Concern	Big Game	Biological Diversity
Large patches (present in all forest successional stages)	Security and connectivity	Security and connectivity, territorial needs, reproduction and foraging (fisher, northern 3-toed woodpecker)	Elk and moose security and habitat connectivity	Territorial preferences
Large trees (standing, down and dead)	Canada lynx foraging (snowshoe hare) and reproduction	Security and connectivity, territorial needs, reproduction and foraging (fisher, bats, flammulated owl, Lewis' woodpecker, pygmy nuthatch, white-headed woodpecker)		Foraging and reproduction
Non-forest (grass/shrub) habitats			Bighorn sheep, elk and moose foraging	
Forested and Meadow Riparian habitats		Security and connectivity, territorial needs, reproduction and foraging (Coeur d'Alene Salamander, fisher, bats)		Foraging and reproduction
Forest succession (early stages)	Canada lynx foraging (snowshoe hare) and reproduction	Territorial needs, reproduction and foraging (northern 3-toed woodpecker in post-burn areas and/or expanses of dead trees)	Elk and moose foraging	
Forest succession (mid- to late stages)	Canada lynx foraging (snowshoe hare) and reproduction	Security and connectivity, territorial needs, reproduction and foraging (fisher, bats in mixed coniferous forest; flammulated owl, Lewis' woodpecker, pygmy nuthatch, white-headed woodpecker in dry forest ponderosa pine/Douglas fir)	Elk and moose hiding cover; moose foraging	Foraging and reproduction
Uncommon Habitat Elements		Foraging, reproduction and connectivity (snails, slugs); hibernacula, reproduction and foraging (bats)		

## **APPENDIX II – Suggested Plan Components** (Previously presented version without comments)

### **Desired Conditions**

- Key ecosystem characteristics are spatially, temporally and structurally distributed to support reproduction, foraging, security, sheltering and territorial preferences.
- A minimum of 70% of the potential snowshoe hare winter habitat is available within each LAU.
- In the Bitterroot Mountains Breaklands, preferred browse, less than 15 years old, occurs on 10 to 20% of winter range in each 5th HUC.
- Motorized public access is managed to limit displacement from seasonally critical habitats, particularly birthing/nesting habitats.
- Rare habitat elements (such as wet, fractured rock outcrops, calcareous substrates, talus slopes, isolated gorges and narrow canyons, and riverside sandbars) remain available for wildlife habitation.

### **Objectives**

- To support the sustainability and distribution of lynx prey within the plan period, promote the development of 15,000 acres of snowshoe hare winter habitat.

### **Standards**

- To analyze the availability and distribution of snowshoe hare winter habitat, recognized lynx analysis units will be used.

### **Guidelines**

- To promote germination and resprouting of preferred winter elk browse species, develop prescribed burning prescriptions for ignition between July 15 and October 15.
- To provide for habitat use and security, the need for, and use of permanent roads, vegetation management practices should occur in large patches (typically exceeding 250 acres, with up to 1000 acres preferred)
- To preserve habitat when closing mines or caves that are known or suspected to be occupied by bats, install bat-friendly closures.
- To protect occupied habitat mountain quail habitat and populations, avoid prescribed fire projects during nesting season.

### **Suitability**

- Bighorn sheep core herd home ranges are not suitable for domestic sheep or goat grazing, trailing and recreational (goat) packing
- Motorized over-snow travel beyond designated routes is not suitable in elk and mountain goat winter habitats.

### **Other Management Direction**

- Wolverine management direction, when developed, will be incorporated into the revised Forest Plan.
- To achieve the maximum browse response from prescribed fire, management practices, such as slashing, timber harvest or prescribed fire, could be needed to provide suitable fuel conditions. Prescribed fire on elk winter is appropriate prior to July 15 to promote resprouting in grassland/shrubland habitats, achieve other management objectives, or establish fuel breaks in preparation post-July 15 prescribed fire of achieve browse.

- To reduce disturbance in suitable elk calving areas, motorized access should be limited between May 1 and July 10. Determinations, in consultation with the IDF&G, should be made at the project level and based on local site conditions.
- To reduce motorized disturbance to elk during severe winter conditions, access may be locally restricted or re-routed.
- To reduce management conflicts on roads closed to the public during the general big game season, limit administrative use to emergency, law enforcement or uncontrollable circumstances.
- To limit or avoid disturbances to rare/unique habitats identify mitigations, avoidance or barriers (such as fencing) at the project level.
- To protect active peregrine falcon and eagle nests, identify mitigations at the project level.

### ***Management Strategies***

Reduce the adverse impacts to wildlife habitats, populations and loss of security associated with and permanent road system by:

- Managing forest vegetation in larger patches when creating young forest patches and/or promoting the development or retention of older forest patches;
- Increasing reliance on temporary roads for timber harvest access;
- Obliterating temporary roads upon completion of management activities within a given patch;
- Physically closing roads not needed to manage the larger patch in the next several decades to all motorized traffic;
- Limiting motorized re-entry into large patches to coincide with forest cultural needs (thinning, final harvest...). Generally, re-entry into the interior large patches is expected to be 3 to 5 decades following the last cultural treatment.

### ***Partnership Opportunities***

Rocky Mountain Elk Foundation  
 Rocky Mountain Bighorn Society  
 Idaho Department of Fish and Game  
 Nez Perce Tribe

### ***Coordination Opportunities***

NFMA efforts, well distributed in both roaded and unroaded landscapes, would direct resource managers to jointly evaluate a landscape, such as a given 5<sup>th</sup> HUC. Compliance with or departures from multiple resource desired conditions would be used to identify management opportunities/needs, document priorities and propose projects.

### APPENDIX III – SUGGESTED FOCAL SPECIES

**Elk** rely on forages typically associate with and produced in full sunlight for most of their weight gain and winter range needs. Forages grown in full sunlight in the plan area rely on stand-replacing disturbance or in certain permanent grass/meadow habitats. Under stresses associated with calving, hunting and severe winter conditions, elk are susceptible to being dislocated by human/predation disturbances from quality habitats. While the Forest Service cannot directly manage the stresses associated with predation, considerations for limiting chronic human disturbance into quality habitats during critical periods of stress are possible. In a general sense, larger areas void of chronic human disturbance are preferred. Because of the concerns for providing quality forages and limiting chronic disturbance, elk (as focal species) represent those species associated with scale, frequency and intensity of disturbance needed to assure broadly available (temporally and spatially) access to quality foraging habitats. Elk should serve as a focal species in breakland and upland landscapes (while they also occur in subalpine habitats, the forages in this landscape are typically permanent grass/meadow habitats).

**Fisher** are associated with large, contiguous patches of close-canopied conifer forests that contain large, live trees and snags, and large down wood. Large trees and contiguous forest patches provide for denning, hunting, resting and sheltering. The availability of large, down wood is important to many of the prey species (squirrels, chipmunks, mice/voles, hares and forest grouse). Conditions of close-canopied forest with large trees (standing and down) is associated with infrequent stand-replacing disturbance and mature forest. Stressors include higher road densities where there is increased exposure to trapping and loss of large trees in mature forest stands to firewood removal. Because of their association with contiguous patches of closed-canopied, mature forest habitats, the fisher represents those species (such as forest bats, northern goshawk and pileated woodpecker) that are associated with habitats that experience relatively infrequent stand-replacing disturbance. Fishers “drive” retention of forest structure and scale. Fisher should serve as a focal species in upland landscapes (while they also occur in moist breaklands habitats, occupied habitat in this landscape is typically associated with or in close proximity to relatively stable riparian habitats).

**Snowshoe hares** are associated with dense cover and browse forages. These conditions occur as dense stands of young conifers re-establish following stand-replacing disturbance or with aging stand conditions that include both large and young trees in the forest understory. The highest densities of snowshoe hare are typically associated with gentle or rolling terrain occupied by stands of dense young western redcedar, grand fir and lodge pole, and mid-seral, moist grand fir and subalpine fir habitats. Because of the role as a prey base for Canada lynx (...and coyotes, bobcats, hawks, owls, fisher, pine marten, mink...), snowshoe hare’s either select for, or survive more successfully, in dense forested cover. As the primary prey for Canada lynx, particularly in the winter, dense forest habitats selected by snowshoe hares occurs on northerly, moist aspects. These conditions occur with stands of dense lodgepole pine containing a shrub component and subalpine fir/spruce forests with limbs to the ground and dense conifer reproduction in the understory. Because the temporal and spatial reliance of snowshoe hare winter habitat on both stand-replacing disturbance and advancing forest succession in moist subalpine fir habitats, the snowshoe hare represents the need to assure the availability and sustainability of both dense young and older forest habitats critical Canada lynx recovery. Snowshoe hare should serve as a focal species in subalpine landscapes (while they also occur in upland habitats, this landscape is not considered suitable Canada lynx).

**Flammulated owls** are associated with large, open-canopied ponderosa pine. Large trees and snags provide for nesting, foraging and sheltering. The availability of large, standing trees and snags is important pygmy nuthatch, white-headed and Lewis’ woodpecker. Conditions of open-canopied forest with large trees (standing and down) are associated with frequent disturbance and mature forest. The flammulated owl should serve as a focal species in dry, breakland landscapes (while they also occur in moist breaklands habitats, occupied habitat in this landscape is typically associated with incidental inclusions of mature ponderosa pine or Douglas fir on dry ridges). This species would represent the key ecosystem characteristics that also support white-headed woodpecker, pygmy nuthatch and Lewis’ woodpecker.