



**File Code:** 2670  
**Route To:** 1900

**Date:** December 1, 2015

**Subject:** Chugach National Forest Species of Conservation Concern

**To:** Chugach Forest Supervisor

I have reviewed your letter of August 24, 2015 regarding recommendations for Species of Conservation Concern for the Chugach National Forest and my staff has carefully reviewed and evaluated relevant documents including your Land Management Plan Revision Assessment and planning record (FSH 1909.12 Chapter 20, Section 21.42). Species of Conservation Concern (SCC) designations are intended to provide for a diversity of plants and animals and maintain viable populations within the plan area. Criteria for establishing SCC are clearly outlined in FSH 1909.12 Chapter 10, Section 12.52c, specifically:

1. The species is native to, and known to occur in, the plan area.

A species is known to occur in a plan area if, at the time of plan development, the best available scientific information indicates that a species is established or is becoming established in the plan area. A species with an individual occurrences in a plan area that are merely "accidental" or "transient," or are well outside the species' existing range at the time of plan development, is not established or becoming established in the plan area. If the range of a species is changing so that what is becoming its "normal" range includes the plan area, an individual occurrence should not be considered transient or accidental.

2. The best available scientific information about the species indicates substantial concern about the species' capability to persist over the long term in the plan area. See FSH 1909.12, zero code, section 07, for guidance on best available scientific information.

If there is insufficient scientific information available to conclude there is a substantial concern about a species' capability to persist in the plan area over the long-term that species cannot be identified as a species of conservation concern.

If the species is secure and its continued long-term persistence in the plan area is not at risk based on knowledge of its abundance, distribution, lack of threats to persistence, trends in habitat, or responses to management that species cannot be identified as a species of conservation concern

I appreciate the significant effort and expertise expended by your staff in developing your recommendations and I especially value the outreach they did with key conservation stake-holders. Long-term conservation requires collaboration and the commitment of many.

After careful consideration and consistent with my responsibility and authority (36 CFR 219.7(c)(3), FSM 1921.04(a)) I have determined that the best available scientific information indicates substantial concern about the capability of one species to persist over the long-term on the Chugach National Forest (36 CFR 219.9(c)).



- **Dusky Canada Goose (*Branta canadensis occidentalis*)** Persistent global concerns about the viability (36 CFR 219.19) of dusky Canada goose places special interest on the critical breeding habitat for this species that exists on the Chugach National Forest. Your efforts, in partnership with many others, have been and will continue to be critical to the future of the dusky Canada goose.

This species meets the criteria set forth in the 2012 planning rule and subsequent Directives for SCC status. You are directed to develop plan components (36 CFR 219.9(b)) for your revised Land Management Plan that will maintain a viable population (36 CFR 219.19) of dusky Canada geese within the plan area.

For the purpose of Plan revision, you will specifically analyze potential efforts to Species of Conservation Concern. Once the Record of Decision for the Chugach National Forest Land Management Plan Revision is signed, I will concurrently eliminate the list of Regional Forester's Sensitive Species for the Chugach National Forest consistent with my authority outlined in FSM 1103, paragraph 6. Projects that you initiate after the effective date of the ROD will analyze effects to SCC (and other species deemed appropriate by you). Projects initiated prior to the effective date of the Revision ROD will specifically analyze effects to species on the current (2009) list of Regional Forester's Sensitive Species.

Your staff recommended other species for SCC status that my analysis determined did not warrant that classification. I specifically do not mean that there are no conservation opportunities for the other species evaluated in your August 24, 2015 letter; rather, for a variety of reasons those species do not meet the intent of 36 CFR 219.9 as interpreted in FSH 1909.12 Chapter 10 Section 12.52c. There are many ways to conserve biological diversity and I encourage you to take appropriate steps when and where deemed necessary to secure the biological legacy of the Chugach National Forest. Species of Conservation Concern can be identified at any time deemed appropriate by the Regional Forester and while I believe we have identified the appropriate list for today, future issues may require that we work together to accord SCC status to additional species.

#### Species Recommended but Not Selected for SCC Status

- **Aleutian Cress (*Aphragmus eschscholtzianus*):** This species is globally secure and its suitable habitat on the Chugach NF is relatively common. Although it is apparently rare on National Forest System Lands, threats identified in the assessment are hypothetical (mining) or outside the control of the agency (climate change). Although this rare species is worthy of continued monitoring, it does not meet the requirements for Species of Conservation Concern status (FSH 1909.12 Chapter 10 Section 12.52c).
- **Sessileleaf Scurvygrass (*Cochlearia sessilifolia*):** The taxonomic status of sessileleaf scurvygrass is currently in question. The risk factors identified in the assessment are poorly defined, hypothetical, or outside the control of the agency. Furthermore, the low-tidal habitat (or estuarine) that this species occupies may be within the regulatory control of the State of Alaska, and not the Chugach National Forest. Because of questions about the taxonomy of this species and the lack of tangible threats, Species of Conservation Concern Status is not warranted (FSH 1909.12 Chapter 10 Section 12.52c).

In addition to the species evaluated and recommended by your staff, we assessed whether a select group of additional species might also warrant SCC status. In the end we did not include any of these species in your list of SCC. The additional species we considered, the reasons why they were considered, and our justification for not including them in the final list of SCC are displayed below:

- **Black Oystercatcher (*Haematopus bachmani*):** Recent national discussions regarding the status of Black Oystercatcher motivated a closer look at the status of this species within the Chugach National Forest plan area. After careful consideration of external comments, we concur with the viability determination made in your plan assessment.
- **Aleutian Tern (*Onychoprion aleuticus*):** Significant concerns about the viability of Aleutian Terns have been expressed to reviewers in the Regional Office. Staff has carefully considered the supplemental information provided and have concluded that, although there is some uncertainty about the status of breeding colonies within the Chugach National Forest plan area, there is insufficient evidence of a viability concern for this species.
- **Rusty Blackbird (*Euphagus carolinus*):** Although Rusty Blackbird populations are in decline globally and within Alaska, the existing breeding population on the Chugach National Forest (Cordova District) is stable or growing and there is therefore not currently a viability concern (36 CFR 219.19) on National Forest System Lands. You are encouraged to continue your current monitoring program.
- **Alaska Yellow Cedar (*Callitropsis nootkatensis*):** On April 10, 2015 the USFWS issued a positive 90-day finding on the June 24, 2014 petition to list Yellow Cedar as endangered or threatened under the Endangered Species Act. Populations of Alaska Yellow Cedar are known to occur on the Chugach National Forest. We have reviewed the status of this species on the Chugach National Forest in the context of its global distribution and have determined that Species of Conservation Concern status is not currently warranted because your local populations are stable or growing and do not appear to be affected by the threats identified in the listing petition (FSH 1909.12 Chapter 10 Section 12.52c).

I again commend your staff for their thorough and careful consideration of potential species of conservation concern for the Chugach National Forest. The 2012 Planning Rule presents us with a meaningful opportunity to engage with our conservation stakeholders and think about the preservation of diversity in a new way.



BETH G. PENDLETON  
Regional Forester

cc: Cheryl Carrothers, Maria Lisowski