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Subject: Chugach National Forest

To: Forest Supervisor, Chugach National Forest

On June 6th, 2016 the Washington Office issued updated information concerning the selection of Species of Conservation Concern (enclosed). Based on that direction, I requested Regional Office Staff to reevaluate the December 1st 2015 decision I made regarding your August 24, 2015 recommendations for Species of Conservation Concern for the Chugach National Forest. Staff has carefully reassessed and evaluated relevant documents including your Land Management Plan Revision Assessment and planning record (FSH 1909 .12 Chapter 20, Section 21.42) in light of the new direction. 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 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 cooperation of your staff in this process.

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 two 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.
- Aleutian Cress (*Aphragmus eschscholtzianus*): Currently suitable habitat on the Chugach NF is relatively common, although there are very few known occurrences on National Forest System Lands.

The best available scientific information strongly suggests that climate change will probably significantly alter the existing occupied and potential habitat for this species in the Chugach National Forest Plan Area. I commend the efforts of your staff in tracking this species overtime.

These species meets the criteria set forth in the 2012 planning rule and subsequent Directives for SCC status. You are directed to develop, where necessary, 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 and Aleutian Cress within the plan area.

For the purpose of Plan revision, you will specifically analyze potential effects 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. Our reevaluation of your August 24th, 2015 list affirmed that *Cochlearia sessilifolia* (sessileleaf scurvygrass) does not warrant SCC status at this time. I specifically do not mean that there are no conservation opportunities for this species; 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 or the June 6th, 2016 policy clarification letter. 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.

In addition to the species evaluated and recommended by your staff, the Regional Office reevaluated a select group of additional species that might also warrant SCC status. In the end we did not include any of these species in your list of SCC. 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.

/s/ BETH G. PENDLETON

Regional Forester

Enclosure

cc: Wayne Owen, Cheryl Carrothers, Maria Lisowski