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Date: February 22, 2021

Subject: Species of Conservation Concern List for the Helena – Lewis and Clark National Forest’s Revised Land Management Plan- Corrected

To: William Avey

During the pre-decisional review period for the Helena-Lewis and Clark National Forest’s revised land management plan, I received several objections regarding the identification of the Forest’s species of conservation concern. Objectors asserted additional species should be included on the list, due in part to differences in their interpretation of the 2012 planning rule requirements. These objections were forwarded for review to the Acting Associate Deputy Chief, representing the Chief of the Forest Service Victoria Christenson.

After review by a team of specialists, she found I had appropriately applied the criteria outlined in Forest Service Handbook 1909.12. However, I did receive instruction to clarify the rationale for not including several specific species and to evaluate two additional species that were not previously eligible for identification as Forest Service species of conservation concern on the Forest.

As instructed, resource specialists in the Northern Region reviewed the documentation and added information where needed to clarify why a species does or does not meet the definition of a Forest Service species of conservation concern found at 36 CFR 219.9(c). Rationale documents were updated to clarify how NatureServe rankings and broad scale threats were considered, how species observations were used to determine if species were “known to occur” in the plan area, and how available information was used to determine whether or not there is substantial concern about the capability of some species to persist.

I reviewed this additional documentation to determine if any changes were warranted and found that the expanded documentation further supports my previous findings. Thus, I have not made any changes to my determinations for the species evaluated for the May 2020 list.

Specialists also evaluated two additional species, wolverine and arctic grayling, that were not considered when I first identified the Forest’s list of species of conservation concern because they were proposed for listing under the Endangered Species Act. The Fish and Wildlife Service recently withdrew the proposed listing of wolverine and found that arctic grayling was not warranted for listing as endangered or threatened, making both species eligible for consideration as species of conservation concern. I reviewed the new species evaluations and found that the best available scientific information does not support a finding that there is substantial concern about either species’ capability to persist over the long term in the plan area. Therefore, I am not identifying either as a Forest Service species of conservation concern on the Helena-Lewis and Clark National Forest.



I have complied with the reviewing officer's instructions and have attached the February 2021 list of species of conservation concern for the Forest. The supporting documentation can be found on the Northern Region's website:

<https://www.fs.usda.gov/detail/r1/landmanagement/planning/?cid=fseprd500402> . Please note that the identification of species of conservation concern is a dynamic process. New scientific information may prompt future changes in the identified species. Future evaluations will follow the process described in Forest Service Handbook 1909.12, section 21.22b.

I look forward to continuing our collaborative efforts in conserving the diversity of species on the Forest.

LEANNE M. MARTEN
Regional Forester

cc: Julie Schaefer, Christopher Savage

February 2021 Species of Conservation Concern for the Helena-Lewis and Clark National Forest

Table 1. Animal Species of Conservation Concern

Scientific Name	Common Name
<i>Otus falmmeolus</i>	Flammulate Owl
<i>Melanerpes lewis</i>	Lewis's Woodpecker
<i>Margaritifera falcate</i>	Western Pearlshell
<i>Oncorhynchus clarki lewisi</i>	Westslope cutthroat trout

Table 2. Plant Species of Conservation Concern

Scientific Name	Common Name
<i>Adoxa moschatellina</i>	musk-root
<i>Amerorchis rotundifolia</i>	round-leaved orchis
<i>Aquilegia brevistyla</i>	short-styled columbine
<i>Astragalus convallarius</i>	lesser rushy milkvetch
<i>Astragalus lackschewitzii</i>	Lackschewitz's milkvetch
<i>Botrychium crenulatum</i>	wavy-leaved moonwort
<i>Botrychium paradoxum</i>	peculiar moonwort
<i>Braya humilis</i>	low northern rockcress
<i>Castilleja kerryana</i>	Kerry's paintbrush
<i>Cypripedium parviflorum</i> (<i>Cypripedium calceolus</i> var. <i>pubescens</i>)	small yellow lady's-slipper
<i>Cypripedium passerinum</i>	sparrow's-egg lady's-slipper
<i>Delphinium bicolor</i> ssp. <i>calicicola</i>	limestone larkspur
<i>Draba densifolia</i>	denseleaf draba
<i>Drosera anglica</i>	English sundew
<i>Drosera linearis</i>	slenderleaf sundew
<i>Eleocharis rostellata</i>	beaked spikerush
<i>Elymus innovatus</i>	northern wildrye
<i>Epipactis gigantea</i>	giant helleborine
<i>Erigeron flabellifolius</i>	fan-leaved fleabane
<i>Gentianopsis macounii</i>	Macoun's gentian
<i>Goodyera repens</i>	northern rattlesnake plantain
<i>Grindelia howellii</i>	Howell's gumweed
<i>Lycopodium dendroideum</i>	tree-like clubmoss

Scientific Name	Common Name
<i>Phlox kelseyi</i> var. <i>missoulensis</i>	Missoula phlox
<i>Polygonum austinae</i>	Austin's knotweed
<i>Potamogeton obtusifolius</i>	blunt-leaved pondweed
<i>Ranunculus pedatifidus</i>	northern buttercup
<i>Schoenoplectus subterminalis</i>	water bulrush
<i>Scorpidium scorpioides</i>	scorpidium moss
<i>Sphagnum fimbriatum</i>	fringed bogmoss
<i>Stipa lettermanii</i>	Letterman's needlegrass