



AGENDA REQUEST FORM
BOARD OF SUPERVISORS
COUNTY OF INYO

For Clerk's Use Only:
AGENDA NUMBER

- Consent Departmental Correspondence Action Public Hearing
 Scheduled Time for Closed Session Informational

FROM: Inyo County Planning Department

FOR THE BOARD MEETING OF: August 11, 2015

SUBJECT: Inyo National Forest Plan Update – Species of Conservation Concern

RECOMMENDATION: Review the U.S. Forest Service's proposed Species of Conservation Concern in regards to the Inyo National Forest Plan Update/Revision and authorize the Chair to sign correspondence in regards thereto.

SUMMARY DISCUSSION: The Inyo National Forest (INF) is working on updating the INF Plan.¹ The 2012 Planning Rule identifies a new category of special-status species, known as Species of Conservation Concern (SCC). As indicated in the 2012 Planning Rule² [refer to 36 CFR 219.9(c)], SCC

...is a species, other than federally recognized threatened, endangered, proposed, or candidate species, that is known to occur in the plan area and for which the regional forester has determined that the best available scientific information indicates substantial concern about the species' capability to persist over the long-term in the plan area.

County staff is concerned that the SCC will result in additional permitting burdens by providing a new category of species to be considered. The County has repeatedly expressed dismay at the number of SCC being considered; despite this, the list of proposed SCC has grown, and is now over 140 species.

The Forest Service's newly approved Planning Rule Directives³ state that species with status ranks of G/T1 or G/T2 on the NatureServe ranking system must be considered as SCC. Species with NatureServe G/T1 or G/T2 status ranks are expected to be included unless it can be demonstrated and documented that known threats for these species, such as those threats listed for the species by NatureServe, are not currently present or relevant in the plan area. It appears that the newly expanded list relies heavily on the NatureServe database.

The Forest Service recently invited public input regarding the SCC (refer to Attachment 2). Staff has prepared draft correspondence (refer to Attachment 1) for the Board's consideration expressing concern about the scope of the proposed SCC and identifying process issues with their development. Comments are due August 14.

OTHER AGENCY INVOLVEMENT: Department of Agriculture, U.S. Forest Service; Mono, Fresno, Madera, and Tuolumne counties; Town of Mammoth Lakes and City of Bishop; other interested persons and organizations.

¹ Refer to <http://inyoplanning.org/InyoNationalForest.htm> for more information about the County's participation in the Plan Update/Revision.
² Refer to <http://www.fs.usda.gov/main/planningrule/home>.
³ Refer to <http://www.fs.usda.gov/detail/planningrule/home/?cid=stelprd3828310>.

ALTERNATIVES: The Board could direct changes to the correspondence. The Board could also not provide input regarding the SCC; this is not recommended due to the importance of the SCC to the Plan.

FINANCING: General fund resources are utilized to monitor planning work in the Forest. Resources for Willdan's assistance with the effort are funded by operating transfer from the Geothermal Royalties fund. Staff anticipates that the SCC will result in additional permitting burdens within the Forest, and indirectly additional future unknown costs to the County.

APPROVALS

COUNTY COUNSEL:	AGREEMENTS, CONTRACTS AND ORDINANCES AND CLOSED SESSION AND RELATED ITEMS <i>(Must be reviewed and approved by county counsel prior to submission to the board clerk.)</i>
AUDITOR/CONTROLLER:	ACCOUNTING/FINANCE AND RELATED ITEMS <i>(Must be reviewed and approved by the auditor-controller prior to submission to the board clerk.)</i>
PERSONNEL DIRECTOR:	PERSONNEL AND RELATED ITEMS <i>(Must be reviewed and approved by the director of personnel services prior to submission to the board clerk.)</i>

DEPARTMENT HEAD SIGNATURE:
(Not to be signed until all approvals are received)



Date: 8/5/15

Attachment 1 – Draft Correspondence
Attachment 2 – Forest Service SCC Materials

August 14, 2015

Ed Armenta, Supervisor
Inyo National Forest
351 Pacu Lane, Suite 200
Bishop, CA 93514

Re: Inyo National Forest Plan Update/Revision – Species of Conservation Concern

Dear Supervisor Armenta:

On behalf of the Inyo County Board of Supervisors, thank you for continuing to provide avenues for public input regarding the Update/Revision to the Inyo National Forest Plan. We appreciate the opportunity for the public to participate in development of the Plan, particularly the Species of Conservation Concern (SCC).

As we have expressed repeatedly throughout development of the Planning Rule and the Update/Revision process, we are very concerned about the scope of the proposed SCC. We believe that the vast scale of the SCC being considered will result in significant socioeconomic impacts to Inyo County by further restricting access to the Forest; increasing permitting burdens for the County, volunteer organizations, non-profits, and private enterprise, and; complicating future Forest actions. We believe that the more than 140 SCC proposed will be unwieldy and difficult with which to work; we strongly encourage striving to diminish the size of the list to provide a more meaningful, effective, and manageable strategy to address at-risk species.

We are disappointed that the current documents under public review do not include any meaningful analysis of why the SCC were selected. According to the Forest Service Directives, SCC should be chosen by the Regional Forester if 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. According to the Directives to implement the 2012 Planning Rule, species should not be included as SCC if it can be demonstrated and documented that known threats for these species, such as those threats listed for the species by NatureServe, are not currently present or relevant in the plan area. Although NatureServe provides a valuable tool to begin discussing the universe of species that might be considered for SCC, further analysis should be undertaken to determine threats to species, and ultimately to decide what species should be included in the SCC.

We note that the "black box" NatureServe database appears to be the primary determinant of the proposed SCC. Threats listed for the proposed SCC are not consistently available for inspection through NatureServe. Furthermore, it is not apparent how consistently the NatureServe information has been collected or verified, nor what significant threats NatureServe provides for all the species being considered as SCC. For these reasons, it does not appear valid to utilize NatureServe as the primary determinant of SCC.

We believe that the Regional Forester should evaluate whether or not species being considered as SCC are threatened in the Plan area and explain the analysis, and provided for by the Directives. We urge considering the SCC in light of all the scientific information available and in balance with other important Plan objectives.

Thank you for your attention to these matters. Please contact Kevin Carunchio, County Administrative Officer, at (760) 878-0292 or kcarunchio@inyocounty.us if you would like to discuss further.

Matt Kingsley, Chair
Inyo County Board of Supervisors

cc: Board of Supervisors
County Administrative Officer
County Counsel
Planning Department
Doug Wilson, Willdan
Regional Council of Rural Counties
California State Association of Counties
National Association of Counties
Randy Moore, Region 5 Forester



Inyo National Forest Draft Proposed Species of Conservation Concern

Species of Conservation Concern Identification Process

As part of the process for revising the forest plan for the Inyo National Forest, we have compiled a proposed list of Species of Conservation Concern. The Species of Conservation Concern list is required by the 2012 Planning Rule, and identifies species at risk of being lost from a forest.

We evaluate species for proposed Species of Conservation Concern listing by following a process outlined in a national directive (FSH 1909.12 § 12.52c-d). As species are considered, Forest Service specialists do research using databases, scientific studies, local information, and expert knowledge.

In addition to research conducted by Forest Service specialists, the national directive requires use of threat status rankings, determined in large part through [NatureServe](#), a non-profit organization that provides proprietary wildlife conservation-related data, tools, and services. The conservation status rank of a species is represented by a letter and a number. The letter represents one of two distinct geographic scales: global (G) and state (S). The status rank number is on a scale of one to five, where a ranking of one indicates a species at the highest level of risk and a ranking of five indicates the lowest level of risk (Table 1). The status rank number is preceded by the letter reflecting the appropriate geographic scale of the assessment. For example, a status rank of G5 represents a species that has an extensive range of distribution and has a low risk of extinction.

Intraspecific taxa refer to subspecies, varieties, and other designations below the level of species. The status rank of intraspecific taxa (subspecies or varieties) is indicated by a supplementary T-rank, following the species' global rank. Rules for assigning T-ranks follow the same principles outlined above. For example, the rank of a critically imperiled subspecies of an otherwise widespread and common species would be G5T1.

A description of the process used in evaluating species is provided below and, since it is not a completely linear process, is also displayed in a flowchart (Figure 1). The flowchart visually captures the main steps in the Species of Conservation Concern determination process and demonstrates that the questions asked are at times taxa specific.

Steps in the Species of Conservation Concern Identification Process:

Mandatory criteria that must be met in order for a species to be considered a Species of Conservation Concern:

- The species is native to, and known to occur in, the area covered by the forest plan.

- The best available scientific information about the species indicates substantial concern about the species' capability to persist over the long term in the forest plan area.

Species that must be considered:

- Species with a NatureServe G/T1 or G/T2 status rank (Table 1).
- Species that were removed within the past 5 years from the Federal list of threatened or endangered species, and other delisted species that regulatory agencies (e.g. US Fish & Wildlife Service) still monitor.

Species that should be considered:

- Species with NatureServe status rank of G/T3 or S1 or S2 (Table 1).
- Species listed as threatened or endangered by relevant states or federally recognized Tribes.
- Species identified by Federal, State and federally recognized Tribes as a high priority for conservation.
- Species that have been petitioned for Federal listing and for which a positive “90-day finding” has been made by a regulatory agency (e.g. US Fish & Wildlife Service).
- Species for which the best available scientific information indicates there is local conservation concern about the species' capability to persist over the long-term in the plan area due to:
 - ◆ Significant threats, caused by stressors on and off the plan area, to populations or the ecological conditions they depend upon (habitat), including threats from climate change;
 - ◆ Declining trends in populations or habitat in the plan area;
 - ◆ Restricted ranges (with corresponding narrow endemics, disjunct populations, or species at the edge of their range); and
 - ◆ Low population numbers or restricted ecological conditions (habitat) within the plan area.

Table 1. NatureServe¹ conservation status ranks and definitions.

Status Rank	Status Rank Definition
1	<i>Species is Critically Imperiled:</i> At very high risk of extinction or elimination due to very restricted range, very few populations or occurrences, very steep declines, very severe threats, or other factors.
2	<i>Species is Imperiled:</i> At high risk of extinction or elimination due to restricted range, few populations or occurrences, steep declines, severe threats, or other factors.
3	<i>Species is Vulnerable:</i> At moderate risk of extinction or elimination due to a fairly restricted range, relatively few populations or occurrences, recent and widespread declines, threats, or other factors.
4	<i>Species is Apparently Secure:</i> At fairly low risk of extinction or elimination due to an extensive range and/or many populations or occurrences, but with possible cause for some concern as a result of local recent declines, threats, or other factors.
5	<i>Species is Secure:</i> At very low risk of extinction or elimination due to a very extensive range, abundant populations or occurrences, and little to no concern from declines or threats.

¹NatureServe is a non-profit organization that provides proprietary wildlife conservation-related data, tools, and services to private and government clients, partner organizations, and the public.

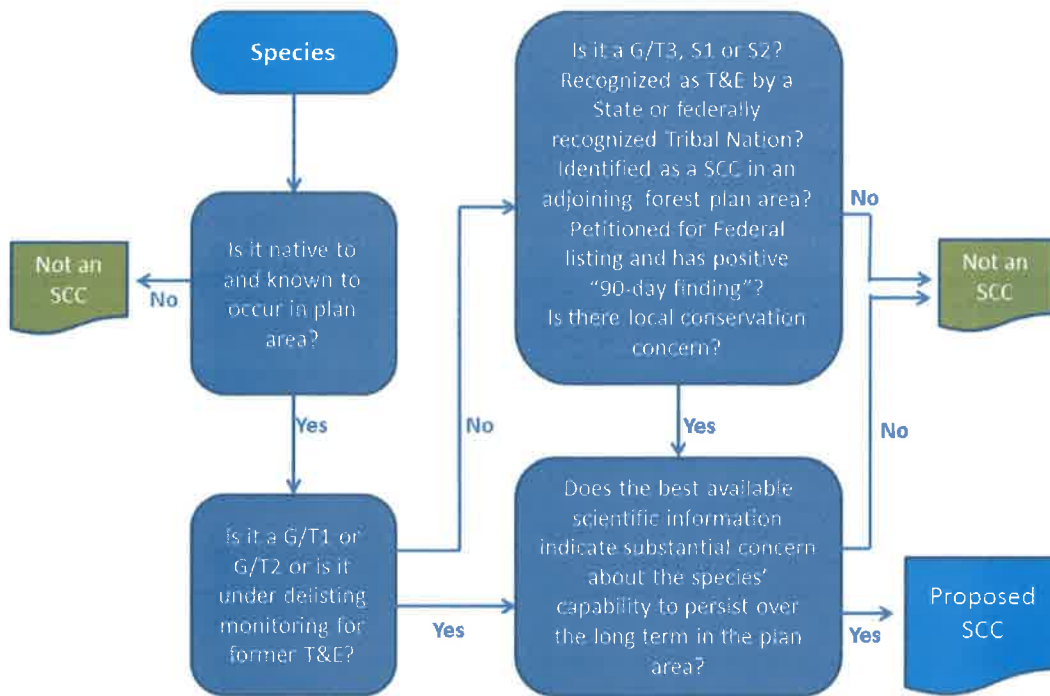


Figure 1. The directive-based process used by the Forest Service for determining species of conservation concern. (Note: The NatureServe rankings that are included here by letters and numbers are explained above).

Proposed Species of Conservation Concern for the Inyo National Forest

The proposed list of Species of Conservation Concern for the Inyo National Forest is shown in Table 2. The proposed list includes species of mammals, birds, amphibians, fish, terrestrial invertebrates, aquatic invertebrates and plants. The proposed species have a high threat rank in NatureServe and there is scientific information to indicate substantial concern about the species' capability to persist over the long term in the plan area. A few terrestrial invertebrate species have been placed in a separate row labeled "potential terrestrial invertebrate." The reason these are considered potential Species of Conservation Concern is that although they have a high threat rank in NatureServe, scientific information is lacking to indicate substantial concern about the species' capability to persist over the long term in the plan area. We are asking the public for their expertise to support or not support their listing.

Table 2. Draft proposed list of Species of Conservation Concern on the Inyo National Forest.

Type	Common Name (<i>Scientific name</i>)
Mammals	Sierra Nevada red fox (<i>Vulpes vulpes necator</i>) Pacific fringe-tailed bat (<i>Myotis thysanodes vespertinus</i>) Townsend's big-eared bat (<i>Corynorhinus townsendii</i>)
Birds	Willow flycatcher (<i>Empidonax traillii</i>) Bald eagle (<i>Haliaeetus leucocephalus</i>) American peregrine falcon (<i>Falco peregrinus anatum</i>)
Amphibians	Inyo Mountains salamander (<i>Batrachoseps campî</i>) Black toad (<i>Anaxyrus exsul</i>) Kern Plateau salamander (<i>Batrachoseps robustus</i>)
Fish	California golden trout (<i>Oncorhynchus mykiss aguabonita</i>)
Terrestrial Invertebrates	Ringlet (<i>Coenonympha tullia mono</i>) Sierra sulphur(<i>Colias behrii</i>) Square dotted blue (<i>Euphilotes battoides hadrochilus</i>) Square dotted blue (<i>Euphilotes battoides mazourka</i>) Mono Lake checkerspot (<i>Euphydryas editha monoensis</i>) Sierra skipper (<i>Hesperia miriamae</i>) White Mountains skipper (<i>Hesperia miriamae longaevicola</i>) Gorgon copper (<i>Lycaena gorgon micropunctata</i>) White Mountains icarioides blue (<i>Plebejus icarioides albihalos</i>) Boisduval's blue (<i>Plebejus icarioides inyo</i>) Arrowhead arctic blue (<i>Plebejus podarce cilla</i>) White Mountains saepiolus blue butterfly (<i>Plebejus saepiolus albomontanus</i>) San Emigdio blue (<i>Plebulina emigdionis</i>) White Mountain skipper (<i>Polites sabuleti albamontana</i>) Atronis fritillary (<i>Speyeria mormonia obsidiana</i>) Apache fritillary (<i>Speyeria nokomis apacheana</i>) Mexican cloudy wing (<i>Thorybes mexicana blanca</i>) A cave obligate pseudoscorpion (<i>Tuberochernes aalbui</i>)

Type	Common Name (Scientific name)
Potential Terrestrial Invertebrates ¹	A grasshopper (<i>Agnostokasia sublima</i>) Mount Whitney grasshopper (<i>Hebardacris albida</i>) A grasshopper (<i>Trimerotropis leucophaea</i>)
Aquatic Invertebrates	Western pearlshell mussel (<i>Margaritifera falcata</i>) Denning's cryptic caddisfly (<i>Cryptochia denningi</i>) A caddisfly (<i>Lepidostoma castalianum</i>) A caddisfly (<i>Lepidostoma ojanum</i>) A mayfly (<i>Ironodes lepidus</i>) A mayfly (<i>Cinygmula tioga</i>) California stonefly (<i>Sweltsa resima</i>) Wong's springsnail (<i>Pyrgulopsis wongi</i>) Owens Valley springsnail (<i>Pyrgulopsis owensensis</i>)
Plants	Alpine bentgrass (<i>Agrostis humilis</i>) Coyote gilia (<i>Aliciella triodon</i>) Great Basin onion (<i>Allium atrorubens</i> var. <i>atorrubens</i>) Inflated Cima milk-vetch (<i>Astragalus cimae</i> var. <i>sufflatus</i>) Inyo milk-vetch (<i>Astragalus inyoensis</i>) Long Valley milk-vetch (<i>Astragalus johannis-howellii</i>) Spiny-leaved milk-vetch (<i>Astragalus kentrophyta</i> var. <i>elatus</i>) Lemmon's milk-vetch (<i>Astragalus lemmonii</i>) Kern Plateau milk-vetch (<i>Astragalus lentiginosus</i> var. <i>kernensis</i>) Mono milk-vetch (<i>Astragalus monoensis</i>) Raven's milk-vetch (<i>Astragalus ravenii</i>) Shockley's milk-vetch (<i>Astragalus serenoii</i> var. <i>shockleyi</i>) Kern County milk-vetch (<i>Astragalus subvestitus</i>) Bodie Hills rockcress (<i>Boechea bodiensis</i> (<i>Arabis</i> b.)) Hidden rockcress (<i>Boechea evadens</i>) Pinzl's rockcress (<i>Boechea pinzliae</i>) Shockley's rockcress (<i>Boechea shockleyi</i> (<i>Arabis</i> s.)) Tiehm's rockcress (<i>Boechea tiehmii</i> (<i>Arabis</i> t.)) Tulare rockcress (<i>Boechea tularensis</i>) Upswept moonwort (<i>Botrychium ascendens</i>) Scalloped moonwort (<i>Botrychium crenulatum</i>) Common moonwort (<i>Botrychium lineare</i>) Mingan moonwort (<i>Botrychium minganense</i>) Bolander's bruchia (<i>Bruchia bolanderi</i>) Inyo County star-tulip (<i>Calochortus excavatus</i>) Pygmy pussypaws (<i>Calyptridium pygmaeum</i>) Davy's sedge (<i>Carex davyi</i>) Spikerush sedge (<i>Carex duriuscula</i>) Idaho sedge (<i>Carex idahoa</i>) Liddon's sedge (<i>Carex petasata</i>) Northern meadow sedge (<i>Carex praticola</i>) Western single-spiked sedge (<i>Carex scirpoidea</i> ssp. <i>pseudoscirpoidea</i>) Steven's sedge (<i>Carex stevenii</i>) Tioga Pass sedge (<i>Carex tiogana</i>)

Type	Common Name (<i>Scientific name</i>)
Plants	Western valley sedge (<i>Carex vallicola</i>) Wheeler's dune-broom (<i>Chaetadelpha wheeleri</i>) Fell-fields claytonia (<i>Claytonia megarhiza</i>) Kern Plateau bird's-beak (<i>Cordylanthus eremicus</i> ssp. <i>kernensis</i>) Hall's meadow hawksbeard (<i>Crepis runcinata</i> ssp. <i>hallii</i>) Rosette cushion cryptantha (<i>Cryptantha circumscissa</i> var. <i>rosulata</i>) Bristlecone cryptantha (<i>Cryptantha roosiorum</i>) Panamint Rock-goldenrod (<i>Cuniculotinus gramineus</i> (<i>Chrysothamnus g.</i>)) Globose cymopterus (<i>Cymopterus globosus</i>) July gold (<i>Dedeckera eurekensis</i>) California draba (<i>Draba californica</i>) White Mountains draba (<i>Draba monoensis</i>) Mt. Whitney draba (<i>Draba sharsmithii</i>) Male fern (<i>Dryopteris filix-mas</i>) Gilman's goldenbush (<i>Ericameria gilmanii</i>) Compact daisy (<i>Erigeron compactus</i>) Limestone daisy (<i>Erigeron uncialis</i> var. <i>uncialis</i>) Pinyon Mesa buckwheat (<i>Eriogonum mensicola</i>) Alpine slender buckwheat (<i>Eriogonum microthecum</i> var. <i>alpinum</i>) Olancha Peak buckwheat (<i>Eriogonum wrightii</i> var. <i>olanchense</i>) Yellow spinecape (<i>Goodmania luteola</i>) Beautiful cholla (<i>Grusonia pulchella</i>) Poison Canyon stickseed (<i>Hackelia brevicula</i>) Sharsmith's stickseed (<i>Hackelia sharsmithii</i>) Blandow's bog moss (<i>Helodium blandowii</i>) Jaeger's hesperidanthus (<i>Hesperidanthus jaegeri</i>) White Mountains horkelia (<i>Horkelia hispidula</i>) Short-leaved hulsea (<i>Hulsea brevifolia</i>) Inyo hulsea (<i>Hulsea vestita</i> ssp. <i>inyoensis</i>) Field ivesia (<i>Ivesia campestris</i>) Alkali ivesia (<i>Ivesia kingii</i> var. <i>kingii</i>) Fivepetal cliffbush (<i>Jamesia americana</i> var. <i>rosea</i>) Seep kobresia (<i>Kobresia myosuroides</i> (<i>K. bellardii</i>)) Lance-leaved scurf-pea (<i>Ladeania lanceolata</i> (<i>Psoralidium lanceolatum</i>))
Plants	Inyo biscuitroot (<i>Lomatium foeniculaceum</i> ssp. <i>inyoense</i>) Mono Lake lupine (<i>Lupinus duranii</i>) Father Crowley's lupine (<i>Lupinus padre-crowleyi</i>) Inyo blazing star (<i>Mentzelia inyoensis</i>) Sweet-smelling monardella (<i>Monardella beneolens</i>) Blue pendant-pod oxytrope (<i>Oxytropis deflexa</i> var. <i>sericea</i>) Limestone beardtongue (<i>Penstemon calcareus</i>) Marble rockmat (<i>Petrophyton acuminatum</i>) Inyo phacelia (<i>Phacelia inyoensis</i>) Mono phacelia (<i>Phacelia monoensis</i>)

Type	Common Name (Scientific name)
Plants	Charlotte's phacelia (<i>Phacelia nashiana</i>) Silver bladderpod (<i>Physaria ludoviciana</i>) Nevada ninebark (<i>Physocarpus alternans</i>) Parish's popcornflower (<i>Plagiobothrys parishii</i>) Mason's sky pilot (<i>Polemonium chartaceum</i>) Williams' combleaf (<i>Polycytenium fremontii (williamsiae)</i>) Narrow-leaved cottonwood (<i>Populus angustifolia</i>) Morefield's cinquefoil (<i>Potentilla morefieldii</i>) Beautiful cinquefoil (<i>Potentilla pulcherrima</i>) Frog's-bit buttercup (<i>Ranunculus hydrocharoides</i>) Redspined fishhook cactus (<i>Sclerocactus polyancistrus</i>) Fringed chocolate chip lichen (<i>Solarina spongiosa</i>) Fivefinger chickensage (<i>Sphaeromeria potentilloides var. nitrophila</i>) Prairie wedge grass (<i>Sphenopholis obtusata</i>) Small-flowered rice grass (<i>Stipa divaricata</i>) Alpine jewelflower (<i>Streptanthus gracilis</i>) Masonic Mountain jewelflower (<i>Streptanthus oliganthus</i>) Horned dandelion (<i>Taraxacum ceratophorum</i>) Foxtail thelypodium (<i>Thelypodium integrifolium ssp. complanatum</i>) Lake Tahoe serpentweed (<i>Tonestus eximius</i>) Slender townsendia (<i>Townsendia leptotes</i>) Little bulrush (<i>Trichophorum pumilum</i>) Dedecker's clover (<i>Trifolium kingii ssp. dedeckerae (T. dedeckerae)</i>) Golden violet (<i>Viola purpurea ssp. aurea</i>)

¹There are several terrestrial invertebrate species that are considered potential Species of Conservation Concern; they have a high threat rank in NatureServe but we lack scientific information to indicate substantial concern about the species' capability to persist over the long term in the plan area. We are asking the public for their expertise to support or not support their listing.

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U.S. Forest Service
Pacific Southwest Region



July 2015

Species of Conservation Concern Frequently Asked Questions

What is a Species of Conservation Concern?

A species of conservation concern (SCC) is a plant or animal for which we have concerns about its ability to remain on a landscape for a long time. Each forest plan has its own SCC list, which is approved by the Regional Forester. The Regional Forester has not yet approved these draft proposed lists.

What is the difference between an “SCC” and a Threatened or Endangered species?

An SCC is a Forest Service-specific term that comes from the 2012 Planning Rule and Forest Service Handbook. The regulations help us determine if there is a concern about a particular species' ability to persist within the forest. If there is a concern, we design elements of the forest plan to provide the habitat conditions that will enable the species to persist on the forest. An SCC is not a federally threatened, endangered, proposed or candidate species under the Endangered Species Act. We create an SCC list using the best available science in a proactive step intended to prevent species from becoming federally listed.

Threatened and endangered species are federally designated under the Endangered Species Act of 1973. This Act was created to protect critically imperiled species from extinction. Similarly to how we address SCCs, if species that are listed or candidates for listing under the Endangered Species Act are present on the forest, then the forest plan must contain direction designed to prevent the species from further decline and contribute to their recovery. Even if the federally listed species is not currently present on the forest but habitat critical to their recovery has been identified on the forest, our forest plan must contain direction to maintain that habitat.

How do SCCs influence forest plan revisions?

Once we have an SCC list, we determine the habitat needs of each species. We then design forest plans to guide management that sustains habitat to support or restore secure SCC populations to the extent we are capable of doing so. Forest plans help us maintain a forest that provides SCCs with the habitat they need to survive.

For instance, each forest plan will have certain components, including standards or guidelines, to sustain or restore ecosystem diversity and habitats. We consider these elements “coarse” filter plan components. If the coarse filter plan components do not provide the habitat conditions each SCC population requires to persist on the forest, then we include additional species-specific plan components to provide habitat conditions necessary for the species. These second components are “fine” filters.

What does “substantial concern” mean?

Substantial concern means there is credible evidence that there is a concern about a particular species’ ability to persist within the forest. This evidence can include:

- The species has been identified as imperiled as a result of status reviews described in the scientific literature and listed in widely accepted databases such as [NatureServe](#), a non-profit organization that provides proprietary wildlife conservation-related data, tools, and services.
- Significant threats, such as climate change or competition from exotic species, threaten SCC populations or their habitat.
- Field surveys have documented declining SCC populations or habitat in the forest plan area.
- The species is known to have low population numbers or restricted habitat within the forest plan area.

What is the difference between an SCC list and the Regional Forester’s list of sensitive species?

While the two lists are similar, they are different. An SCC list is a new element required by the 2012 Planning Rule. This list has specific requirements and will replace the Regional Forester’s list of sensitive species, which was required by the 1982 Planning Rule. While the goal of both lists is to prevent species from being federally listed as threatened or endangered, the SCC list has more comprehensive and defined criteria for inclusion than the Regional Forester’s list of sensitive species, making it less likely that a species in need of help will be overlooked.

Another difference between the lists is our management approach to using the lists. Under the Regional Forester’s sensitive species list (1982 Rule) we manage forest resources to maintain species viability, which was often too difficult to measure at the forest level to know if we were being successful. Under the SCC list (2012 Rule) we manage forest resources to provide the type of habitat and other conditions that the species need to persist on the forest.

Are the Regional Forester’s sensitive species included on the SCC list? If not, why?

The SCC lists includes most of the Regional Forester’s sensitive species but not all of them. We didn’t include all the species for a variety of reasons, such as a lack of scientific information to

support a substantial concern for the species, or because the latest scientific information such as the NatureServe database indicates that the species is not at risk.

Is the California Spotted Owl an SCC?

Yes. We are including management strategies in the draft forest plans to help sustain this species across these three forests. We are also analyzing interim recommendations for the California Spotted Owl in one of our management alternatives of the draft environmental impact statement that will be released for public comment later this year. This analysis is due in part to the Sierra Nevada Framework Settlement we reached last year.

In addition to our plan revision efforts, we are developing a conservation strategy for the California Spotted Owl. If you are interested in this strategy, stay engaged. We will include the public and our stakeholders in developing that strategy later this year.

Is the Pacific Fisher an SCC?

No, because it is a candidate species under the Endangered Species Act and the 2012 Planning Rule provides that the SCC list should not include candidate species. Like the California Spotted Owl, we are developing a conservation strategy for the Pacific Fisher. The goal of this effort is to help conserve and sustain the fisher population. We are working with other federal and state land managers to synthesize key information on the species, including management effects and policies to build a strategy grounded in the best available science. For more information about this strategy, visit our [website](#).

Why are “potential” terrestrial invertebrates on the SCC lists?

The proposed SCC species have a high threat rank in NatureServe and there is scientific information to indicate substantial concern about the species’ capability to persist over the long term in the plan area. A few terrestrial invertebrates have been labeled “potential terrestrial invertebrate.” The reason these are considered potential SCCs is that although they have a high threat rank in NatureServe, scientific information is lacking to indicate substantial concern about the species’ capability to persist over the long term in the plan area.

We are asking the public for input to support or not support the draft proposed SCC listings. Your feedback is most useful if submitted by August 14, 2015, via electronic mail to: r5planrevision@fs.fed.us Please include “SCC lists” in the subject line.

Are these the final SCC lists?

No. While these are our draft proposed SCC lists for each forest, they are not final. We are continuing our analysis, so these lists may change before we release the draft environmental impact statement and draft forest plans later this year. The lists may also change from the draft forest plans to the final forest plans based on the information we gather now and during upcoming public comment periods.

If you know of a species that we missed in our analysis, or a species that we should not have included in our analysis, let us know. Please provide evidence to support your reasoning and where our process should have or not have included the species. Your feedback is most useful if submitted by August 14, 2015, via electronic mail to: r5planrevision@fs.fed.us Please include “SCC lists” in the subject line.

What will we do with your input on the SCC list?

We will consider all the input we receive. When we review the feedback, we will ask ourselves if the input offers valid scientific information we have yet to consider. If so, we may remove or add species from the list based on the valid scientific information we receive. Such changes will be documented in the SCC list released in either the draft forest plans or the final forest plans.

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