

# Lemhi Soil and Water Conservation District

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Charles A. Mark, Forest Supervisor

Salmon-Challis National Forest

1206 Challis St.

Salmon, ID 83467

June 5, 2018

Dear Supervisor Mark,

The Lemhi Soil and Water Conservation District (LSWCD) is a local unit of government that was established over 50 years ago to carry out natural resource management programs working with land owners and operators in Lemhi County on a voluntary basis.

As the Board of Supervisors of the LSWCD we are extremely concerned about the process and eventual effect of the species of conservation concern (SCC) list drafted for the Forest Revision plan. Once approved this list will be very difficult to modify so it's important to get it right the first time.

LSWCD has neither the time nor expertise nor the resources to hire a consultant (as the SCNF did) to review this list species by species. We do however see the overall long-term consequences that this list will have on our constituents, as such we are weighing in with major concerns over the process and that there are not specific, national forest level studies made before a species is put on this list. Some of our concerns include:

1. The process uses a global model and protocol for identifying species of concern that may not be appropriately used on a local basis. The species are identified not by specific studies but by an extrapolation of random, non-statistically generated sightings.
2. The existing databases used to identify species were not made with a consistent, scientifically significant, observation process but by identifications of species over decades of time by different people with different expertise/training and different motivations. The time period looks impressive until it is noted a species may have only 2-3 sightings over a 30-60 year time period (see *Juncus hallii* and *Ephemerella alleni* as examples).
3. No documentation is made justifying why a species isn't considered accidental or transient in the area (only if it is considered accidental is a justification needed). Some of these species could be abundantly found in the area but not

noted for various reasons such as never being specifically looked for or difficulty in identification.

4. When read in depth there seems to be a lack of information/knowledge about many of the criteria about these species; terms like 'likely', 'low confidence,' 'no abundance information' and 'no species specific information' are often found within the individual species reviews which do not bring confidence to their inclusion. Just because not much is known about a species should not be justification for it's inclusion as a SCC.

While we know that complete studies are beyond the resources (financial and personnel) available to the SCNF to identify which species should be put on the list, **the reverse is also true**. Once this list is approved, removal of species will only be possible by extensive studies that no-one, especially local people, will be able to finance (the actual process for removal has not even been defined).

The LSWCD would like to see studies that directly involve local experts and direct interface with our local County Commissioners. We also would like to see an assessment of the effects the Forest Revision Plan and specifically the SCC list on current range, ranchers, landowners, outfitters and the local economy.

Please provide the LSWCD with notification of public meetings on the Forest Revision Plan and SCC at [lsxcd@hotmail.com](mailto:lsxcd@hotmail.com) or the address shown above.

In conclusion the LSWCD is stating our major concern with publishing a list of SCC that we do not believe has been developed using the best scientific information (it may be the best AVAILABLE information but good decisions are not based on limited data). This list will have far-reaching effects on long and short-term decisions that will affect the local economy, the people and the land.

Sincerely,



Rusty Hamilton, Chairman Lemhi Soil and Water Conservation District  
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Salmon, ID 83467