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Keith Lannom
Forest Supervisor
500 North Mission Street Building 2
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RE: Comments on DEIS Middle Fork Weiser River Project

Dear Forest Supervisor Lannom:

I have reviewed in some detail the Draft Environmental Impact Statement for the Middle Fork of the Weiser River Project and have a number of comments and questions. First I wish to clarify that I am also a voting member of the Payette Forest Coalition and as a member of that coalition represent the Adams County Natural Resource Committee. That committee, authorized by county ordinance through the Commissioners selected members of the public to help, in an advisory capacity, deal with or resolve issues dealing with the management of natural resources in Adams County, especially public land management issues. As chairperson for that committee I represent that committee on the PFC.

The PFC has met and reviewed this project and the proposed alternatives developed for this restoration project. The group including myself, reached consensus and supported a slightly modified version of Alternative 2 as proposed by the Forest Service in the project DEIS. I commend the Forest Service for the Alternatives that they developed for the project because they portray alternatives that create a variety of ways under which the project area could be managed based on constraints that came from a variety of sources from legal mandates to science sources to personal experience. In all cases interpretation plays an integral role. That interpretation and open-ended question that can occur resulting from it is the area that I will be seeking resolutions about.

One area of some concern for the coalition dealt with wildlife security, in particular elk security tied to the Hillis paradigm. While the issue had resolution the issue that has not been resolved is the overall management of elk numbers in relation to the yearly habitat situation. In some regard, this starts with Payette Forest Plan that recognizes winter range as being up to 5000 feet elevation. That certainly does not reflect the current situation. The most apparent reason elk remain at that elevation until December 31 is that hunting season lasts that long. Recently the elk after season closed immediately move to the Indian Valley, Crane Creek and Little Weiser Valley ranchland and the available hay stacks when the hunters left. To try and halt the ranchland depredation elk fences are installed by IF&G, but they run out of resources and the ranchers lose patience.

Many of these ranchers providing winter feed also have Forest Service grazing permits, some in the Middle Fork. There have been during recent years when grazing permit turnout was delayed

because proper-use was reached on the lower areas of the allotments from early spring gazing by elk. The question really is how much more secure do you need elk to be. I realize this is the "cash cow" for IF&G but it has other costs. If the ranchers sold out and developments of summer homes and ranchettes occurred, the winter range support for elk would quickly dwindle. Did the IF&G collaborate with habitat providers before they established the population goals, my rancher contacts don't remember any such contact.

I realize the Forest Service only provides habitat but that management should at least have a cooperative element associated with it. It would be very nice to see some of the elk disappear so that some of the great mule deer hunting of the past might return to the Council Mountain area. Many record book bucks came from that area in the past. It would seem the Forest Service would be supportive of a broader array of animals on the habitat provided by the Payette National Forest.

The PFC spent some time discussing restoration strategies, as well as fire patch and pattern to assure that the proposed treatments in the alternatives would lead to the restoration of fire in the Middle Fork project forest area. In reviewing your literature sources on fire restoration treatments one helpful source that you seemed to have missed was; Mimicking Nature's Fire, by Stephen F. Arno and Carl E Fiedler published by Island Press. This book by Forest Service scientist of the Rocky Mountain Research Station. It has numerous case studies of forest fire restoration treatments in several western forest ecosystems. The authors are respectively a forest fire ecologist and forest silviculturist. The authors seem to support the proposals in the MFWR project.

At several different places in the document there are canopy coverage numbers cited. What is not readily apparent is how that number is verified for a number of purposes. There are various tools that can be used, which with some experience, can provide repeatable and verifiable measures and it would seem important that some tool and procedure be defined so that successes with applications can be repetitious. As a silviculturist I have some concerns that many of the crown canopy cover numbers may be higher than appropriate in some situations. In some prescribe fire situations that I am familiar with close canopy cover in small sawtimber sized ponderosa pine was very prone to scorch and higher rates of mortality than desired. This seemed to occur when even a very weak local inversion situation caused smoke and heat buildup under a denser canopy did not allow dispersal. This may not happen but tools to measure so monitoring results can be transferred and adaptive management practices employed is important.

Several places in the document describes the implementation of the FT-PC-MSw treatment. In reviewing that treatment there appears to be some problems. Again canopy covers appear to be higher than appropriate to accomplish the objective especially in the regeneration areas. The 10% cover level for seral species especially western larch, because the opens are small and often shaded by side walls, larch would probably not regenerate even if planted. Another concern I have is the retention of grand fir as legacy trees. Grand fir is a nutrient hog and it is a prolific seeder, especially when slightly stressed physiologically. Leaving such trees will often result in swamping of seral species regeneration because of the competitive nature of grand fir seedlings. There is much research and anecdotal evidence supporting this.

When dealing with whitebark pine it is important to evaluate the viability of blister rust spores. I do not recall the literature dealing with this. Leaving dead affected trees as snags could exacerbate the problem of infections.

In the CT-MP treatments it appears that the density levels are sufficiently high that re-entry to treat these areas will occur between 20 and 30 years unless substantial canopy loss and interaction is acceptable. That does not coincide with discussions about re-entry that the PFC had with the agency concerning road management and the need for transportation facilities to treat the stands to allow for more prescribed fire treatment.

In the CT-ASP treatment situations it will be very important to monitor for success of the treatments. Treatments especially when small in size will allow the suckering of the aspen clones but often those ramets are consumed by ungulates unless the treatment size is sufficiently large to simply overpower the ungulates with food supply. The other alternative is to provide sufficient protection so that ungulates can‘t reach the ramets. The monitoring is often difficult to get done because at higher elevation the elk and other ungulates will utilize the ramet to near ground level and such use is almost undiscernible.

There is no discussion about any form of protection to any of the different regeneration situations. Is any fencing planned and if so how will this be handled with grazing permits?

At page 61 in the temporary roads discussion there is a description about relocating a temporary road on the location of an “unauthorized” exist roadbed. That appears to me to be a descriptor for identifying a road that should exist on the Forest Transportation system at some maintenance level such as OM1. The roadbed was used once for management activity and it is being used again for management activity, is the reason for future re-entry being done away with?

Throughout the document there were a number of comments about the need to control or reduce disturbance in order to reduce sedimentation. While there is some limited discussion about graveling of roads the discussion is very limited. With several gravel sourced identified it appears appropriate to consider much more graveling of roadbeds, including ditch lines and some fill slopes. Numerous closed or OM1 roads that have little soils for vegetation recovery should have gravel placed on them to reduce the effect of splash, across road and other sediment moving water transport. This practice was used extensively in the South Fork of the Salmon to help mitigate sediment movement on the erosive granites following the 1994 fires salvage efforts.

Several of the proposed log haul roads are not low-boy compatible and have some safety issues with the numerous recreational drivers on these roads. Road enhancement should be undertaken to allow the hauling of equipment for both logging and fire control purposes. Mile markers would add to the safer user of the roads especially when logging is on-going. Adams County’s Middle Fork road has several segments that need heavy maintenance to increase safety and reduce sediment. It would be very appropriate to look to some of the new congressional authorities to aid in the reconstruction of this road with such things as retained receipts from the projects proposed.

There is a discussion about the effectiveness of road closures on various classes of roads. It is important to understand why some “closed” roads are used by the public that should not be. The MVUM is a poor aid to keep people honest about use because many see tracks on roads, made by authorized or FS users and they believe they are open. These roads should have metal fence gates and signs with appropriate language that explains the limited allowed use. It is important to sign these gates appropriately including not blocking the gates by parked vehicles.

Will the Forest Service be working with livestock permittee’s to allow some closures of trails when they are needed temporarily to aid in the movement of livestock? Motorized use when cattle are being moved causes many problems including lost cattle and user conflicts.

Consistently, the PFC members and others have raised the issue that Road Density in the term of miles/ square mile while used as a term of evaluation for Forest Plan purposes is a very poor standard of measure because it accounts for very few things that actually influence the watershed conditions. The agency has published other standard of measure that should become the standard of influence dealing with a watersheds condition framework.

At page 80 in the graph in the Alt 3 column the last measurement line has an error in it I believe.

One of the evaluation items discussed in a watershed evaluation area is a term ECA, which is undefined in the glossary of terms but defined in the acronym section as equivalent clearcut acres. I have previously raised the point how poor this term is and how it was discussed and set aside as almost of no use by many watershed and water scientist when it was introduced in the 1980’s. There are so many more drivers in the watershed equation that ECA is of little use and often inappropriately biases things that actually influence the hydrograph of streams and hence the sediment transport. I am sure there are more appropriate tools.

At page 109 of the DEIS dealing with coarse woody debris, how will the situations be handled when no trees are cut that meet the 15 inch diameter standard? It is possible in many of the PVG 7 thru 11 that trees being removed are under that size. Is there an expectation that this material is rather uniformly distributed? Does that seem natural based on the spotty influence of insects on stands that are burned naturally/

Table 3-28, page 197, Alternative 2 total appears to be incorrect.

Page 255, 3.4.5.6.1 first paragraph, the correct Big Game Hunting unit is 32A.

Page 261, 3 para, describes the squirrels as usually associated with deeper well-drained soils. That may be true if there are no other squirrels to compete with but obviously in most of our area Columbian squirrels occupy those sites.

Page 260, 2d winter range paragraph, 2d sentence, the winter range habitat not only abuts private land but it mostly includes private lands. As I previously pointed out this creates more than a little concern.

The entire Canada lynx write up actually points to the need to choose and implement Alternative 4 not only to more appropriately treat the unoccupied habitat for any future expansion of the Lynx but to actually increase the habitat for the whitebark pine, also a listed species but actually present and declining on the area. This coupled with the need to implement the newly developed WUI interface with Tamarack Resort and the developed Cascade Reservoir west edge seems to make far more sense. While the PFC is concerned about the litigation potential, litigants should more concerned about the loss of human property and life if treatments of the WUI and the fire risk are not undertaken in concert with habitat enhancement. Research for both species supports these proposals and the Forest Plan amendment which should have had an administrative caveat to allow such an undertaking really needs amending.

At page 337 one of the watershed resources indicators is roads decommissioned which on its face seems appropriate but in my estimation does little to indicate much except how handy someone is with an excavator or bulldozer. It would appear that this indicator would actually be much more indicative if were actually tied with elements of the soils resource area, the landtype map on page 429. Having had a lot of experience with the landtype association, landtypes, geomorphology and general geologic soil base I believe the miles of decommissioned roads can be tied to a number of potential affects that are relatively predictable. For example subsurface interface interception is highly predictive if the geology is intrusive(granitic), the landtype is fluvial, slope is moderate, but slope dissection is high and a road is on that slope on the slopes lower third. Each of those elements actually influences the interception and handling of the intercepted flow by the road and how various decommissioning practices would influence it. Using these existing elements tied to the landtype mapping should easily help establish priorities for treatments such as road decommissioning as a watershed resource influencer.

The use of the landtype/landtype association maps to highlight landslide potential areas is very useful but I believe the agency is overlooking its potential use for developing other priorities to be field verified. I believe the tie to GRAIP-lite would be very appropriate is it hasn't been done.

At 3.5.1.4.3. Road Condition Surveys, the last sentence in the paragraph describes actions that appear tied to the broad category the agency defines as decommissioning then ends with that encompassing term. It would help to be specific but if all tools are being considered then a term like decommission might suffice.

At 3.5.1.5. The 1st para, 1), at which pre or post fire is the aquatic system's amount and type of vegetation appropriate? This seems to contradict the observations that researchers and others made on the ground relating to RCA vegetation and the rationale for actually doing some treatments in alternative 4? In this general area your narrative leads me to ask the question; would obliterating roads in the upper slopes/elevations actually change the risk factor if no near riparian roads are actually treated? How sensitive is the measure to the actual response or has it ever been assessed?

Table 3-74, check the Mica Creek columns and see if there is not an error in the graph between the two GRAIP columns.

Page 342, both the graphic and write up describe year around or open roads. The term is deceptive in that these roads are not plowed of snow so they are not open to auto traffic year around, however they may have snow machine use. If the roads were plowed and open during breakup and frost out and other such periods I would assume that other treatments might be appropriate to deal with sedimentation or other water handling difficulties. Also check the 2d para. I believe the word 'any' should be many.

At page 344 there is more discussion about ECA, which is not glossary defined. There arestatements that seem to refer to the acceptance of this term as appropriate in hydrologic literature. I suggest you re-evaluate such inferences. The term as far too many FS people use it to infer an almost linear relationships with influences associated with the hydrograph of many mountainous streams and rivers. There are so many effectors of the physics related energy influencers that openings, no matter how they are created, do not have any real equivalency as inferred by ECA. To say it has any sort of direct relationship in a formulaic sense is almost nonsense except in specific sets of circumstances where the other influencing variable are controlled. In another area of indicators you seem to recognize that ECA isn't very appropriate, which is it?

At pages 349 & 350, riparian edge vegetation importance is alluded to, but what is not dealt with in detail is the influence this vegetation has on numerous water elements but also the over-all watershed stability. The bank and instream stability is greatly influenced but a major affecter on this situation is adjacent tree form vegetation. These near edge trees can supplant highly the stabilizing bank vegetation through shading and nutrient loss. In many cases the obvious cottonwood, aspen and dogwood, etc. brush is out competed by nutrient and light hogs such as grand fir.

At Page 454 in the discussion of Whitebark Pine there was little discussion about the sympatic relationship birds, in particular Clarks Nutcracker and whiskey jays have in the regeneration and redistribution of whitebark pine in these upper elevation sites. There seems to be little discussion about how the on-going problem with West Nile virus on birds is having on these and other birds that aid in the regeneration and distribution of these large seeded species such as wingless or nearly wingless very large seeded species such as whitebark pine. The seed transport in lingual pouches and placement below ground surface storage of the seeds of species like whitebark pine is a primary source of regenerating many of these high elevation open grown forests.

At 3.10 Roadless there is little discussion about the number of miles of roads, no matter what kind of road term the agency uses, that are within the IRA's yet many are determined to have a primitive theme assigned to them. How, with those situations existing is it possible to compare un-inventoried adjacent roadless areas resulting from the 9th circuit decision? Just what do you exclude or include in that assessment seems to border on the inane. While the PFC has not dealt with IRA's to date there is obviously a consistency problem, information currency and choice of theme problem associated with many of these areas.

The document seems well prepared and thorough in its approach. Above all it seems to support the need to proceed with management activities that will lead to a forest ecosystem that is more capable of dealing with fire. The mere presence of substantial number of insects and diseases that seem to be precursors to large fires points to the need to proceed with the project. It also seems to point to the need for the Forest Service to select for implementation alternative 4 because it implements more of the goals and desires of the current Forest Plan. That includes amending the plan to implement the new lynx strategy that is supported by "science". In many cases Forest Plans are so dogmatic in their approach that they forget that science continues to move forward but Plans lack the capability to undertake adaptations in management allowing those new found outcomes to be implemented. Even regulatory situations change based on the fire situations of recent years and now new standards for the wildland urban interface will definitely need to be put in-place for the Tamarack Resort area. All these seem to lead toward Alternative 4.

Thank you for being able to review and comment on this proposal. If you have questions please contact me.

Sincerely Ron
Hamilton
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