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Comments: Comments on Granite Goose Landscape Restoration Project Draft Environmental Assessment

I'd like to offer the following comments on the proposed Granite Goose Landscape Restoration Project. I've lived in McCall for thirty years and spent a significant portion of that time on the ground within the project area, both working and playing. I've already commented on the project during scoping and those comments are attached. Following are further concerns roughly organized by topic.

Wolverines

Wolverine protection is of course a new wrinkle in the mix. There is a dynamic between climate change, over-snow recreation, logging/thinning, and wolverine habitat that should be considered. As the rain/snow boundary moves upward in elevation over the coming years, all of these activities will rise as well. Silvicultural activities that involve over-snow operation of equipment (e.g. the whitebark pine work in 2.2.2.5.7) may be highly dependent upon snow cover to avoid soil damage. As an example, I imagine a lot of units where over-snow logging operations were prescribed this winter are being logged over-mud. Avoiding this probably requires some sort of contract language, but should be addressed in the EA. Table 34 makes some mention of buffering wolverine dens from over-snow activities, but I wonder how effective this is overall. Presumably den locations of radio-collared individuals could be known, but is there any estimate of what percentage of the total population this accounts for? Seems like finding other dens would be virtually impossible.

Over-snow recreation impacts to wolverine dens are likely to be the toughest to manage. The Patrick Butte Roadless Area over-snow closure is a good idea, but with steep terrain capable snowmobiles and snowbikes becoming evermore popular, increased usage will likely conflict further with high alpine habitat. Seems like the Slab Butte ridge area would be such an area to think about addressing somehow.

Meadow Restoration

Climate change will also affect meadow restoration projects, particularly those in dry meadows. The removal of encroaching conifers seems like it would be bucking the predicted trends of warming and drying that would favor a natural evolution of dry meadows to forest cover. It's probably not detrimental, but is more of a waste of effort and should be low on the priority list. This treatment may have a bit more merit in the case of wet meadows, especially if combined with actions to increase water table elevations (e.g. beaver reintroduction), groundwater being the dominant factor in wet meadow persistence. One particular wet meadow in need of some help is located in T20N R2W S23 SE. Livestock impacts in the western part of the meadow have compacted soils and decreased vegetation health. Better range management perhaps.

Bear Basin

I support the administrative use designation of the existing roads. Perhaps this will cut down on the firewood poaching in there (assuming there are effective physical barriers constructed). However, I'm not in favor of all the new trail construction shown on map 18, particularly the three emanating from the proposed new parking lot on the east side. I enjoy off-trail hiking along the ridge between Little Bear and Big Bear Basin, and it seems like the trail density in the area is quite high already. I would like to know the rationale behind the new parking lot location. Why not improve the existing parking area located near the center of section 13? This area seems far more logical, since it is well located to the existing trail system and being a barren, heavily wood-chipped old landing, is certainly already counted as TSRC. Why create new disturbance?

I would prefer the over-snow motorized exclusion extend to encompass the meadow east of road 50451. I do a lot of off-track skiing in there. As noted, Bear Basin, including this meadow, have been damaged by off-road vehicle incursions on a pretty regular basis. Construction of a fence (buck & pole, log worm, etc.) along the sections of road 50451 that abut the meadows (both east and west) is imperative to deter further resource damage. If snowmobile access to the eastern meadow is deemed necessary, perhaps a let-down fence design could allow access in the winter.

Shaded Fuelbreaks

I question the need and efficacy of this treatment below the Brundage Mtn. Road. A lot of this is very steep terrain and will be difficult to treat. Some of it is landslide prone as noted in 3.4.5. Some is quite wet as well. It seems like the existing road prism provides a fairly good fuel break already. Section 2.2.1.5.4 states that such fuelbreak treatments would be used up to 660 feet from roads. Much of the area mapped for treatment (Map #8) extends from 1500-2000 feet below the road. What gives? No way do you need to go all the way to the bottom of the canyon. I know there are a lot of large size class trees and old growth along the ridge trending SW from the Goose Creek Falls TH. I trust Forest Plan old growth guidelines will not be violated in the process of implementing shaded fuelbreak treatments.

T19N R3E S18 SW1/4

This is a pretty unique area with a lot going on. It is the only dry meadow on the southern flank of Brundage Mtn. Site of an old growth aspen stand that might benefit from some rejuvenation treatments. It's mapped as a shaded fuelbreak which actually has no trees to cut. It has a new mountain bike trail cut through it that was eroding pretty badly last I saw it. I hike here often in the spring for the panoramic views to the south. I have observed pileated woodpeckers nesting in aspen cavities here. There is one particularly massive doug fir on the edge of the meadow that I believe may be a contender for the Idaho record, certainly in circumference. So it appears that a new road would be constructed through the middle of this meadow. Presumably this would be to access units to the north. Could this be accomplished via a spur off of the 50488 road farther west in order to avoid roading through the meadow? Again, from a recreation perspective, this is a pretty sweet hiking destination.

Road Density

So all subwatersheds would remain functioning at unacceptable risk. Doesn't sound like much "restoration" in that regard. Decommision more roads rather than building and adding more to the system. I suppose these added roads play into the idea of repeated vegetation treatments needed over time to maintain the desired fire behavior characteristics. The GRAIP analysis says that there would be a 247% increase in sediment delivery in the implementation phase (10-15 years) with a 4% decrease in the long term. This begs the question of how long would it take to make up for that early increase to the point where it would be better than no action? And does the model take into account the proposal to repeat maintenance vegetation treatments over time with no apparent end date stipulated? Without knowing the GRAIP model assumptions and input data, I can't comment further on the validity of those predictions.

Vegetation Management

As with many FS projects of late, there may be a tendency to perceive this as yet another gussied up timber sale, the primary rationale being the promotion of fire resilient landscapes with a significant component of disease treatment. All good and well to a point, but in order to avoid this lipstick on a pig view, I hope all the resource specialists are actively involved in designing logical restoration objectives and are not being steamrolled by the timber shop. Fire and cutting to achieve these objectives have legitimate applications but have their limitations and should not be used as an excuse to get the cut out.

I work best off of maps so I'll start with map #8, the Vegetation Management Proposed Action: Fuel Break & Infrastructure Protection map. The corridors along existing system roads are probably reasonable areas for this kind of work, although ideally this would not involve complete clearcutting (VQOs and all that). The other areas slated for this issue are somewhat questionable. Take the area on the north end of Brundage Reservoir. A lot of this ground is pretty wet, almost swampy in parts. There is no infrastructure to protect, and the adjacent road to Sater Meadows along with it's fuel break corridor would certainly be effective for wildfire control. So why there? Merchantable timber?

Next, the slope between Goose Creek and the Brundage Road. OK, we wouldn't want to burn down any of those fresh ski condos, but how practical would this be? That's some really steep ground that appears to be unroaded. If hand crews are thinning, that would be some tough going and expensive to do enough to make a difference. Perhaps further thinning on the road corridor would be sufficient to do the job.

The two belts of fuel break above Warren Wagon road on State land might be justified as structure protection, but having hiked a lot of that ground, I would say that much of it is rocky with an open understory of pinegrass, and fairly thin ladder fuels. Basically probably pretty close to DFC already.

The belt of ground mapped north of Bear Basin from the 50452 up across the 50488 road doesn't seem to be particularly justifiable. There's no infrastructure to protect. There are multiple road corridors identified for treatment there already. Much of that ground follows a broad ridgeline that has plenty of open understory that wouldn't require any treatment. More over, Map 10 shows three new roads within this particular belt, in an area with extremely high road density already (see Map 11). Most of the roads shown on Map 11 as [ldquo]likely needed[rdquo] are heavily overgrown and in some cases completely obliterated (full outslope). Likely needed for what? Explain. There are a few pockets of ground that might be considered to be overstocked, but don't go crazy in here treating ground that doesn't need it.

The problem I see with all the [ldquo]firewise[rdquo] treatment in general is the somewhat myopic focus on fire prevention without acknowledging the detrimental effects on the understory ecosystem. I would hope that the wildlife and botany specialists are consulted extensively on mitigating things like loss of hiding cover, soils drying, and adverse impacts to certain wildcrafting/foraging species (e.g. morels and huckleberries, which I and many others pursue in this area). You may wish to review a Forest Service paper on this subject at https://www.fs.usda.gov/nac/assets/documents/morepublications/NTFP_Jnl-For_Jan-2013.pdf

To get really specific on the topic of vegetation management I would suggest that the PNF do some implementation monitoring of the hand thinning and pile burning that has taken place over the last few years in Bear Basin and the slopes north. I have seen a lot of collateral damage from this practice. There are spots where piles burned hot enough to burn stumps all the way down through the roots and into the intertwined roots of adjacent healthy trees, either killing them or at least compromising their health. I imagine this may be a timing issue with burning things under overly dry conditions. Also there are spots where the duff layer under old growth trees was intentionally burned. No ladder fuels involved, what gives? There are hand lines dug in locations that don't seem to make sense. Detailed fuel prescriptions are only as good as the contract crews who implement them. Please close the monitoring loop and get more qualified people out on the ground.

Some of the prescribed fire situations described on page 16 need further explanation/justification. Why would one bother with burning areas of moderate or long fire frequency? I hope you are not trying to treat areas that are subject to stand replacing crown fires. The requirement for [ldquo]maintenance[rdquo] burning seems like a long-term unsustainable money pit. I assume that some thought has been given to the fact that climate change is going to exacerbate a number of factors working against all the fuel management efforts. Good luck.

The construction of barriers for aspen treatments seems like a costly option that should require some site specific

justification. One might also exercise better range management if livestock browsing is an issue. Get those permitees to hire some actual cowboys to move the cows along in that country on the west side of Slab Butte. The Peruvian sheep herders seem to be a fairly conscientious bunch in the Fisher Creek basin, but there doesn't seem to be much control of the cows west of Slab (witness the meadow damage around Duck Lake).

As far as Whitebark Pine restoration goes, the nutcracker opening treatment seems rather extreme and could lead to habitat destruction of other species. Again, be careful with fixating on one issue at the expense of other resources. This treatment should require very thorough analysis.

Cutting trees encroaching on meadows may be a futile exercise in the long term, since most encroachment is due to a declining water tables and would require groundwater restoration measures (e.g. beaver dam analogs, livestock exclosures, subsurface aquitards) to reverse.

Planting of whitebark pine seedlings is mentioned. Keep in mind this is a very long term proposition, given the rapidly changing winds of FS priorities. When I planted whitebark at Thunder Mountain, the stock we got from the Coeur d'Alene nursery was thirteen years old and less than a foot tall. It had never been claimed by the original project for which it was grown and was being given away to a good home (survival at T-Mtn was pretty dismal unfortunately).

I have one little radical vegetation management suggestion. Something is killing off the doug fir in Bear Basin and it is spreading. It started at 44.941790[deg]/ -116.143722[deg] maybe 5-10 years ago and is moving westward along the ridgeline. Being dead, they probably aren't merchantable timber, but boy that's some fine firewood standing there. If during logging operations farther north of here a crew could drop these and skid them out to the landing at the Big Bear Basin parking area, I'll bet the FS could charge extra money for a special firewood permit to cut on this pile (rather than the laughable half-rotten piss fir tops in other slash piles around the area). If all the easily accessible dead doug in this area were selectively harvested in this manner, it would also reduce the incentive for firewood poachers to keep trespassing into this area pioneering new tracks to get to some of these prime dead trees. This poaching keeps happening year after year because there is no law enforcement (not enough LEOs) to curtail it. A chronic problem. I know this is not a net income producing idea, but it would be a nice little public service sort of job.

Lastly, I am not advocating for any heavy-handed cutting within the proposed winter motorized closure area. There may be limited stands where further non-mechanized thinning would be useful, but if this is too extensive it adversely affects hiding cover for wildlife. Perhaps short winding bands of thinning perpendicular to prevailing winds and likely fire spread direction would break up long contiguous fuel runs while creating shorter line of sight distances that would benefit hiding cover. This is the most heavily used recreation area in McCall, second only to Ponderosa Park. The old patch cuts in there with open xeric understory, uniform age ponderosa regrowth may be good for future timber harvest, but they are aesthetically uninteresting from a recreation standpoint. I'm sure you will get an enormous amount of public interest in the management of this particular area.

Road Management

As Maps 9-11 indicate, the road density particularly at lower elevations is quite high, presumably well over DFC for some resources (wildlife, soils, others?). I would encourage as much obliteration as possible, however a great many of those roads are fully revegetated and not in need of any treatment. Lidar can only tell you so much, if you walk that country north of Bear Basin you run across all sorts of barely discernible road beds. If you want to take these off the system as an accounting exercise, that's fine, but don't bother treating them. There are even some roads such as those north of the 50488 road that are fully recontoured (a very well done job by the way), but are shown as [ldquo]likely needed[rdquo] on Map 11. Say what? Need to get some boots on the ground out there.

There may be isolated instances where culverts were not removed on some of these old regrown roads. If they are eroding badly, there may be justification for removing them if it doesn't require significant disturbance to get to them. Speaking of sediment (one of the prime objectives of road management and closure), I hope you will run some models to see just what sort of net improvement will be realized (or not) from this project. GRAIP or WEPP probably being the best options.

I have to question the need for more new roads along the ridges north and south of Brundage. These areas have particularly nice hiking with views and of course all the off-piste skiing on the north.

There are some maintenance needs on the road to Granite Lake from the north end of Brundage reservoir to the project boundary. This has long been a terrible section that needs some heavy work and could probably use some rock in spots. The road south from Brundage reservoir to Hartley Meadows is heavily eroded, but there may have been some work in there since I was last up that way

Watershed Restoration

The passive treatment of berm closure needs to be applied very strategically. A certain segment of the motorized recreation crowd views these closures as a challenge to be overcome. I recommend serious tank trap size excavations topped with countersunk boulders resistant to winching, located at points with steep side slopes.

A lot of the gullies on the west side of Slab Butte are the result of overgrazing. Improve the range management before you bother trying to fix the problem. Gully rehab can be tricky with things like check dams blowing out laterally and becoming ineffective. Plan this job carefully.

I strongly support meadow restoration in Bear Basin & Hartley Meadows. As mentioned before, falling water tables over the long term may inhibit these activities. Study groundwater flow. I haven't been up to Hartley lately, but Bear Basin is trashed almost every spring by some idiot [ldquo]mudding[rdquo] through the meadows in their 4x4. I recommend constructing log worm or buck and rail fencing along the main through road there.

Map 12 indicates areas of wetland/fen treatment. I'm familiar with some of those small areas on the map. A number of them are fairly inaccessible and in close to pristine condition. I'm not sure if any would technically be classed as fens. What sort of treatments are proposed? As with wet meadows, study groundwater flow carefully before proceeding.

Recreation

Map 14 shows new trail construction parallel to road 508341. This seems unnecessary; the road is right there and is not heavily trafficked. Map 15 shows dispersed recreation along the 50839 road through Bear Basin. I would recommend not allowing this between the Forest boundary on the south and the 50452 road junction. The area (along with little Bear Basin) is becoming a long-term summer base camp for itinerant workers in the area, much like Little Lake. Having long-term camps there detracts from the day use recreation activities in the area. There has been little to no enforcement of camping limits out there for the last several years.

The winter closure of Bear Basin to motorized travel is long overdue and I fully support that action. I ski there at least three times a week all winter and have witnessed countless incursions of snowmobiles and snow bikes into the ski trail network area. Bear Basin as I've noted before is the crown jewel of close-to-town recreation opportunity. Being so popular invariably results in a few cretins creating resource damage of some sort. There is constant poaching of firewood in the western half, motorized meadow damage, and trashed camps. Whatever management actions taken there will require enforcement or they will be useless. The PNF needs to hire more law enforcement. Perhaps securing some funding through the Infrastructure Bill would make that possible.