Frank Schwartz

Scoping Comments for the Granite Meadows CFLRP

1. Since this Granite Meadows Project is being done in response to legislation (PL 111-11 Title IV), the NEPA document should clearly acknowledge that, state the purpose, delineate the actions required by that legislation and how the actions proposed are addressing those requirements (both near and longer term). Without that information, the general public may not understand the full desired outcome of the project. The NOI and detailed Proposed Action do not presently provide that traceability from the legislation to the actions proposed.
2. Even without any reform to NEPA regulations, the NEPA documents can be much simpler, less cumbersome and less voluminous if a few simple guidelines are followed. Only include relevant and important information; say it once; say it well; don’t say it again. Use tiering where applicable. If these concepts are followed, even the current Granite Mountain Proposed Action would be much shorter and user-friendly.
3. Prescribed fire is an important treatment component in these CFLR projects and must be repeated fairly frequently in order to control the accumulation of ground fuels. Along with the benefits of prescribed fire come some down sides. An approach that could reduce the frequency required for prescribed fire in many areas of the forest is to coordinate closely with the grazing program for control of grasses, forbs and brush. Reducing prescribed fire frequency would reduce greenhouse gas emissions, reduce cost and have less impact on wildlife.
4. Road obliteration is expensive and results in significant soil disturbance and increased erosion rates for an undetermined period of time after the work is complete. Where the decommissioning of roads is determined to be necessary for habitat and watershed health, methods other than obliteration should be used. The money saved by not obliterating roads should be applied to accomplish other needed restoration work.
5. Between wildfire, insects and disease, the white bark pine stands have been devastated. Grazing is a management/treatment tool that could play an important role in the restoration of white bark pine by reducing fuel loading in some areas with remaining live white bark pine, and in areas where replanting is planned.
6. The sequencing and coordination of the various treatments should be done with a goal of optimizing the benefits realized and should be addressed in the analyses.
7. There are many actions being proposed in this GM project that cost and have no potential to directly generate revenue. Discussion should be included on how these actions may be accomplished with federal funds, if other funding sources are anticipated, or if no funding is made available and an action is not accomplished, how or if that affects the restoration goals.
8. I agree with the comments/minority opinions provided by the Weiser River Cattle Association on the NOI and Proposed Action.