
**Comments on the Proposed
Middle Fork Weiser River Landscape Restoration Project**

Rodger L. Nelson, 16 January 2015

Scoping Letter

1. Why reduce forest encroachment in non-forested habitats? Isn't this normal ecological succession for meadows? Is it to facilitate the destructive practice of cattle grazing?
2. Page 3: "Decommissioning treatments proposed range from full recontour to spot treating isolated areas such as stream crossings on roads that have little to no defined prism and have recovered." Without obliteration and recontouring, an abandoned road cannot reasonably be considered "recovered." It may be stabilized relative to the usable road, but it still disrupts groundwater hydrology thereby increasing drainage network length and prevents proper rooting of trees.
3. Page 3: Only two culverts will be replaced? At least one of these is an abomination (50186 at 50245), but sure in a project area this large and a watershed with about 40 barrier culverts and about 297 miles of system and other roads on FS lands (2001 Ongoing BA), you can only find two culverts to remove? One might mistake this for a harvestable tree restoration project not a landscape restoration project.
4. By the way, you do realize most maps the public sees don't have the "50" prefix in the road number?

Proposed Action Document

1. Page 1: "The Project area current conditions..." should be rendered "The current conditions of the project area..."
2. Page 1: "The Landscape Assessment evaluated..." I think assessments disclose the results of an evaluation, but only sentient beings can "evaluate."
3. Page 2: Why is a WCF state a purpose rather than attaining improvements in designated LRMP indicators (Appendix B)?
4. Page 4, Objective 4. I think climate may be in control of the fire regime, not the Forest Service. The Forest may, however, be able to maintain vegetation conditions and ecosystem processes approximating a certain fire regime.
5. Page 4, Objective 5. The Forest knows where the next dangerous fires will be? Will these "shaded fuel breaks" need to be mechanically maintained?
6. Page 5: "non-motorized trail and a bridge to facilitate livestock movement" Are these in addition to structures already present and/or analyzed in the Mill Creek-Council Mountain CFLRP project? I assume this will be analyzed in a Biological Assessment (BA) for bull trout, thus requiring a BA when the project would otherwise not likely have needed one.
7. Page 9: Note that RCA Option 2 is for forested areas where the floodplain is narrower than one (non-fish bearing intermittent stream) or two (perennial stream) site-potential tree heights. It does not apply to meadows and site-specific measurements must be made.
8. Page 9: "For consistency and reduction in the margin of error during project layout, using a simpler RCA distance for all PVGs would be most efficient." What does this mean? A stream is either intermittent or it is not; an intermittent stream is either fish-

- bearing or it is not. You want to use a simplified (i.e., less protective) RCA width without verification?
9. Page 10: "In RCAs where there is a specific vegetation treatment objective (i.e., aspen restoration, targeted fuels reduction, or upland vegetation restoration), portions of the RCA could be treated following a site-specific assessment, as long as soil and water requirements can be met." There should be well established criteria for these "soil and water requirements." What are they? The description here is vague with no indication that aquatic ecosystem needs will be met. For example:
 - Will regenerating aspen in a conifer stand change stream shading, snow bridging, etc. given the deciduous nature of aspens?
 - Or will this change the allocthonous energy input to stream benthos?
 - What will be the effect on riparian grasses and shrubs, key components in riparian function?
 - Will this increase or decrease animal diversity in RCAs?
 - What analysis will be done to insure maintenance of appropriate thermal regimes in streams?
 10. Page 10: "Input on treatment design would be given by the district hydrologist or fish biologist in order to ensure that all riparian functions were maintained" This will be accomplished how? These are far more complex ecosystems than forests, clearly defined and credible guidelines and metrics must be created if the Forest intends to deviate from LRMP guidance.
 11. Page 11: "Non-commercial thinning would be completed in plantations that currently have density-related stress occurring."
 - How is this measured or is it just assumed based on density?
 - Is it measured density or remotely sensed?
 - What would the density be after thinning?
 - What is the foundation science behind this concept?
 12. Page 11: "non-commercial tree densities." What science says there should be lower density of non-commercial trees? Bullet 4 suggests you want more diversity, how does this not reduce diversity?
 13. Page 15: There's no reasonable argument for commercially thinning within any portion of RCAs unless the trees are left or added to the stream (LRMP SWST10), and even then it shows a desire to mismanage the forest ecosystem. Streambanks probably need to burn, even "catastrophically" at times. Look carefully at the fire research performed by ISU that the Forest helped support: basically, if I recall correctly, the outcome was that managed forests are less resilient than wilderness; altering the RCA would likely exacerbate that.
 14. Page 15: "Re-establish aspen where they have departed from desired conditions." Those naughty aspens, they should have anticipated the Forest Plan before they departed.
 - Is this an admission that the Forest has historically mismanaged these stands?
 - I'm sure fire suppression was the culprit, how many starts were suppressed in areas that otherwise would have been aspen?
 15. Page 15: "historic fire regimes" Please clarify "historic."

- Who kept records to document historic cover conditions, since such is expected of history?
 - Is "pre-historic" actually the correct term?
 - What period of history/pre-history is to be emulated?
 - How different was that period from now and why should we be able to sustain it (because the Forest Plan calls it DFC is probably sufficient but certainly dodges the issue)?
16. Page 15: What is "legacy like Douglas-fir?"
17. Why is it alright to use commercial thinning in RCAs where you want in timber stands but not to restore aspen; or did I read this incorrectly?
18. Page 16: "Move the project area toward a pre-fire suppression vegetative condition related to stand density, tree size class, and species composition to enable the reintroduction of fire into a fire adapted ecosystem and." Given that global warming is presumed (alright, climate change now even though you officially believes in warming), how do you expect to maintain forests that resulted from Little Ice Age conditions?
19. Page 17: "Due to fire suppression, many wet meadows within the project area have higher tree densities and reduced riparian vegetation."
- Do you have evidence (i.e., monitoring data) to support this contention?
 - Meadow encroachment is a natural successional process which, may well be accelerated by climate warming as well (and climate has been warming since the Little Ice Age).
 - Are there reference areas with which you can compare relative rates of natural vs. this meadow encroachment?
20. Page 17: Wet meadows may constitute RCAs, having nothing to do with tree heights (see LRMP page B-33 items III and IV).
- Have you surveyed for spotted frogs (WIGU05)?
 - How would such an action affect spotted frogs (for example, if it encourages grazing it could harm frogs).
 - Does this comply with LRMP WIST02 or WIGU01?
 - From where does any justification for thinning in RCAs arise, and specifically what is the rational for only a 30-ft buffer around live water?
 - How does this help achieve VEOB01?
21. Page 22: I have no particular issue with the WCF targets, but you should also be implementing the LRMP. The subbasin is shown "at unacceptable risk" for "road density and location" in the Travel management Plan (TMP) BA.
- Are you going to move it or significant subwatersheds to functioning appropriately?
 - Will there be an effort to move any to "functioning at risk" according to Appendix B of the LRMP?
22. Page 22: "...professional judgment of the hydrologist or soil scientist, to a point where features blend with the surrounding terrain and hydrologic and soil functions are largely restored. This is not a common occurrence, and usually these "recovered roads" are legacy non-engineered skid trails or temporary roads that were never recontoured following past management activities."

- Will effectiveness of treatments be monitored?
 - What training will be provided so that professionals can tell whether ground water hydrology and tree rooting potential has been restored?
 - Will the Forest perform some baseline comparison of various road closure/decommission treatments across the Forest to help clarify which are actually effective in restoring these processes?
23. Page 24: "Temporary culverts or bridges would be installed where access crosses intermittent or perennial streams in planned temporary roads or closed system roads where culverts have been removed. Where fish passage is needed, fish passage would be provided."
- Will there be appropriate interviews to document fish in unsurveyed streams?
 - Is the Forest restricting it's concept of passage needs to fish only or including other aquatic and terrestrial organisms?



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