



Boise Valley Fly Fishers. P.O. Box 311, Boise, Idaho 83702

Mountain Home Ranger District
Attention: Scott Bodle
2180 American Legion Boulevard
Mountain Home, Idaho 83647

Re: Scoping Comments on the South Fork Boise River Corridor Post-Fire Restoration Project

After reviewing the proposed action Boise Valley Fly Fishers (BVFF) would like to commend the Mountain Home Ranger District for taking on this recovery effort. We would like the District to know that in addition to our general support of such an effort that BVFF would also like to work with the District during implementation. We can possibly provide some labor and funds to the implementation. Please contact us if you can use this type of assistance during implementation.

Comments are listed by page and heading in the scoping document.

Page 3. Purpose and Need

The purpose addresses wildlife winter range and bull trout critical habitat. The project purpose should recognize the importance of the highly valued rainbow trout fishery located below Anderson Ranch Dam. Rainbow trout and mountain whitefish use this section of the river for spawning, juvenile rearing and adult rearing habitat. Recognizing this fishery as an objective would highlight the need to prevent further sedimentation of spawning, incubation and juvenile rearing habitat that is critical to these fish populations.

Page 6. Proposed Action - Timing

The proposed action is expected to begin Spring of 2015. This is 18 months after the storm event (9/2014) that generated the debris flows and sediment deposition in the river. By approximately June 1 of 2014, the risk to plantings from erosion and runoff should be over. Why wait an entire year to start planting? Planting should occur this spring/summer to take root and begin growth before fall rains and snowmelt runoff.

Page 6. Proposed Action – Identification of Sediment Sources

The proposed action identifies four named tributaries that experienced large scale post-fire mudslides. There are many other significant sources of sediment that resulted from the fire and runoff event. Will a comprehensive sediment source assessment be completed? We suggest that a complete sediment source inventory be completed. In addition to the named tributaries (Wilson, Evans, Pierce and Granite Creeks) we identified the following major debris flow/gully erosion sites on a drive down the South Fork Boise River on February 25, 2014. This is an incomplete list.

1. 43.353378,-115.466398 (lat/longs) Runoff from this gully has dumped sediment into the river and undercut the public boat ramp. The boat ramp needs to be evaluated further, but appear to be in need of repair before further use.
2. 43.352598,-115.469938 Major debris slide. Appears to be an area that will continue to head cut and deliver large quantities of sediment to the river.
3. 43.338335,-115.483541 Major debris slide.
4. 43.358698,-115.538542 Rough Creek. Major debris slide
5. 43.405094,-115.56476 Debris fan originating from Blacks Creek Road

Page 6 Project Design Features

Design Feature #1. The scoping document identifies four stream crossings (Pierce, Granite, Rough, and Castle Creek) that will be repaired or potentially replaced. Is a complete road crossing assessment anticipated? Does the USFS take responsibility for repairs to these roads? Our observation is that several culverts are at high risk for failure. The culvert at Granite Creek particularly appears to be of risk of failure. The culvert is perched in unconsolidated road fill, and water is pouring through the fill below the culvert.

Design Feature #3.

This design feature generally speaks to what would be suitable for the upland plantings and appears to leave out specific precautions for the riparian planting areas. The two plantings are affected differently by grazing. Riparian plants, just after planting and riparian plants in their early stages of recovery after a fire, are more susceptible to the adverse effects of grazing. Consequently, riparian plants should have design features that specifically account for their difference from upland plants.

We believe that the Forest Plan Standards and Guidelines for riparian area livestock utilization are acceptable to maintain established riparian areas. They do not provide adequate protection to riparian plantings where high intensity wildfire and post-fire mudslides have removed, damaged, or killed the riparian vegetation. In these areas the newly planted riparian plants may be the only forage during the early stages of recovery in the target areas. It is also clear that the rest period and plant size criteria in the proposed action are for the upland planting areas. We believe riparian planting areas in high intensity wildfire areas and mudslides should have criteria specifically suited to insuring their success, and therefore we suggest riparian planting areas be free for livestock grazing until the plants are 18 to 24 inches and show robust establishment before grazing is resumed. The 18 to 24 inch height criteria gives these plants time to have well developed root systems and large branch sizes that increase their ability to survive the effects of livestock grazing. We do not presume to know the best way to accomplish this criterion because there are many acceptable alternatives and each planting area may have a different solution. It is probably best if the District and permittees work together to find an acceptable solution for all riparian planting areas.

There are several management situations that give us pause for concern as to how they will be handled in relation to protecting riparian planting in the project area. These management situations would be of a much less concern if the newly planted riparian plants showed robust growth and were 18 to 24 inches in height.

1. Design Feature #3 says "After completing vegetation treatments livestock grazing practices e.g. herding, season of use and temporary electric fencing, , may be altered as needed to hasten or enhance site recovery (Forest Plan Guideline RAGU03 (USDA Forest Service 2010a, p.III-48). Our concern is that the District will be in a reactive mode instead of a proactive mode to making changes to the grazing practices. By reacting to potentially adverse grazing situation irreversible damage could occur to newly planted riparian plants before remedial action is taken.
2. Planting Wilson Creek has some specific challenges that can have adverse effects on young riparian plants. Wilson Creek is the access to and from the Wilson flat pasture so Wilson Creek riparian plantings will be grazed as livestock enter and leave the pasture. At some time during the grazing period for this pasture some of the livestock return to Wilson Creek and the livestock have been known to stay for much or all of the remaining grazing period in Wilson Creek. Also when this pasture is used last the livestock pour off of Wilson Flat at the end of the grazing season and pile up in Wilson Creek waiting to go home for the season. This has caused utilization concerns for Wilson Creek in the past and such heavy utilization would adversely affect the survival of newly planted riparian plants.
3. When Wilson Flat is used as the last pasture there is a lot of drift off Wilson Flat back towards Sproule Flat and down to the river corridor. The livestock that drifts off of Wilson Flat have been known to concentrate in areas around Reclamation Village, Cow Creek, and various camping areas and in some cases have caused heavy utilization before being moved off the allotment. This type of utilization on young riparian plants could be adverse to their survival.
4. When the Dixie Unit is grazed there is always some livestock that make their way down to the benches along the river and stay until they are moved to another pasture or off the allotment. Again there have been instances of heavy utilization on these benches and this could be adverse to the survival of the newly planted riparian plants.
5. The use of the River Unit on the Mennecke Allotment. This is a riparian pasture that receives short duration/high use and generally meets the Forest Plan Utilization standards that are measured at the end of the grazing season. Our concern again is that the newly planted riparian plants won't survive this type of grazing until they show robust growth and reach the 18 to 24 inches in height.

Thank you for your efforts to restore fish and wildlife habitat and for the opportunity to comment on the Post-Fire Restoration Project.

Sincerely,



Steve Bauer, BVFF Conservation Committee Member