



Ted Trueblood Chapter of Trout Unlimited Scoping Document Comments

for the

South Fork Boise River Corridor Post – Fire Restoration Project

Page 1, Project Location

We ask that the project location description include all the side drainages, intermittent or those that may flow year round, that feed the South Fork Boise from the dam downstream, even those that may extend further away from the main river for more than a mile. This is important because we see these stream courses as major contributors to the sediment deposition now occurring in the South Fork. The upland and riparian plantings in and of themselves will not reduce the significant and destructive amount of gullying and down cutting that is presently occurring in these areas.

Page 3, Purpose and Need

The project purpose of the watershed rehabilitation plan should also state and include the preservation of the wild and naturally producing population of rainbow trout in the South Fork. This is the best blue ribbon trout fishery in southwest Idaho. It sustains a strong recreational economy that is valued by thousands of anglers. And rainbow comprise a portion of the forage base for South Fork ESA listed bull trout and the eagle population. The post fire watershed conditions from the Pony and Elk Complex Fires could have a significant adverse affect on the rainbow trout population.

Page 6, Proposed Action

1. The emphasis on the restoration plan is based on riparian and upland vegetation planting measures. This action is certainly needed, but in addition, we have great concerns relative to how the side tributaries (intermittent and otherwise) have been blown out from post-fire rainfall, snow melt and general runoff events. The streams in these small drainages are down cutting and causing tremendous amounts of sediment and debris to enter the South Fork. The erosion conditions found in these drainages need to be assessed by experts and measures identified to deal with the problem. The road district has had to reopen or replace plugged road culverts more than once since the fires. The river has been heavily sedimented in and we believe at least one half of the river reach from Anderson Ranch Dam downstream to Danskin Bridge has been adversely altered from a fish habitat standpoint.

In our reading of the Idaho Roadless rule, we do not believe that use of motorized equipment in roadless areas are prohibited. In other words, you could take a track excavator, spider excavator or rubber tired back hoe across the ground for placement of log or rock structures and other treatments to try to deal with erosion hazards, gullies, slumps, etc.

We believe the proposed action should also include measures to stabilize slope sloughing and the head/bank cutting occurring in these side drainages. This would likely require some artificial structural placements or possibly dropping and securing dead trees in the stream bottoms to slow water and runoff velocity. These structural placements could include boulders, straw bale dams, silt fences, burlap straw wattles, log sills or other measures.

2. Implementation of the fire restoration project is projected to begin in 2015 and go through the fall of 2017. To a large extent, livestock grazing will directly bear upon the speed and extent of upland and riparian vegetation recovery. The Forest Service needs to be extra vigilant in monitoring and regulating livestock grazing during the watershed's recovery. In the years ahead, re-institution of grazing in burned areas must err on the side of caution to assure that recovering plants will remain healthy.

For the Dixie C&H and Mennecke Creek Allotments, please include a discussion of how grazing will be treated and allowed in 2014, before implementation of the rehabilitation plan is scheduled to begin.

3. We believe the proposed rehabilitation should begin in 2014 and that there are important field actions that can be taken by Trout Unlimited and other volunteer organizations this year. These include:

A. During the spring and summer of 2014, cottonwood seed should be collected from seed pods from trees along the South Fork Boise River. These seeds can then be germinated at the Lucky Peak Nursery and grown into seedlings. Trout Unlimited and the Lucky Peak Nursery collaborated in this approach starting in 2011.

B. In the fall of 2014, there should be plantings of dormant plants such as willow cuttings, brush bundles and like methods so that rooting can begin over winter.

C. As discussed at the March 6 meeting at the Bureau of Reclamation office in Boise, we believe that that aerial photography and mapping (such as the use of LIDAR) in degrading drainages should be considered in 2014 while ground vegetation is absent. This could provide valuable information for the drainages that we are concerned about. Trout Unlimited could potentially be a source of funding for some of this technology use.

Page 6, Project Design Feature #3

We are not comfortable with the description of how grazing would be reauthorized in planted areas.

According to this narrative, livestock grazing could commence on planted riparian stock when it reaches 8 – 10 inches tall. We anticipate that riparian plant stock may already be at least that tall when it is initially put in the ground and before any growth starts. There needs to be a much higher standard (taller growth allowance) before livestock grazing is permitted in recovering riparian areas.