Comments 109 Lemhi Dr.

Members of the County Planning and Zoning Commission,

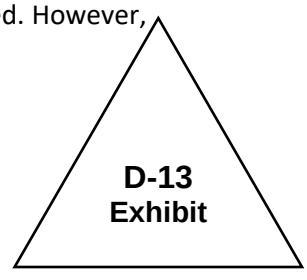
My name is Kelley Weston. My wife Kathleen Diepenbrock and have lived at 117 Blackfeet Dr. since 1988. I am writing to voice my concern with the proposal to dump excavated material from the Lemhi road project onto the property at 109 Lemhi Dr.

I've walked through the lot at 109 Lemhi as many as 3 or 4 times a week at all seasons for the last 30 years and know the site's plant communities and cycles intimately. I accepted long ago that the lot on Lemhi Drive would be developed, and the road upgraded to county fire standards. I do not oppose the development of this lot. My experience tells me however that success in meeting the county's desire that the disturbed area be restored so that it will "blend harmoniously with the surrounding area, and does not create excessive contrast with the surrounding vegetation" is unlikely without sustained attention and expertise. I appreciate the willingness of the county to require a bond to incentivize success but 35 years in the native landscape business has taught me that bonding for the project will not be sufficient. Recovery of the natural landscape is best achieved by minimizing the disturbance to the greatest degree possible. I am in favor of exporting material rather than scraping and covering the 1-2 acres with excavated soils.

I founded Native Landscapes now NativeEvergreen Landscape in 1988 and owned it until February of this year. Over the 35 year period I managed the company we focused on revegetating disturbed construction sites of all sizes with native and compatible plant communities adapted to our Sagesteppe ecosystem. Arid Sagesteppe ecosystems I discovered early in my career are exceedingly fragile and reclaiming disturbed sites, especially hot west facing sites like 109 Lemhi, is exceptionally difficult. Native plants are difficult to establish and hot dry sites like the one being considered here are particularly challenging. Disturbed soils dry out quickly and are often quickly colonized by cheatgrass a highly flammable grass that is very difficult to remove from seeded landscapes. Cheatgrass and other weeds also suppress the germination and establishment of native vegetation including sagebrush by robbing young plants of water. Cheatgrass and knapweed are abundant on this site and I would expect this to be a problem.

A successful restoration of a native Sagesteppe plant community takes 5 to 10 years and a great deal of expertise to succeed. Success or failure is determined early on by the design of the restoration, the seed mix used, how and when that seed is applied and how it is managed in the first one to three years during the establishment phase. Even with sufficient water one can expect a 3-5% germination rate for critical shrub and forb species like sagebrush, bitterbrush and perennial forb species. A lack of water at critical points after germination can easily kill young seedlings as can weed pressure, animal predation and other factors. Grasses germinate and establish more easily (especially non-native wheatgrasses often substituted for native species) and for this reason most "natural" restorations end up dominated by grass. What results is essentially a grassy scar in the midst of a sagebrush covered hillside. This project is a classic example of this problem and the preliminary landscape plan submitted does not address this problem.

Given a choice I would not approve the disturbance and require the excess soil be exported. However, should the county decide to go ahead I believe you should consider the following criteria:



- A plant survey by a botanist should be required prior to disturbance and species specified should reflect this survey.
- The entire site should not be scraped! If one truly wants to maintain the natural ecology and aesthetic qualities of the site, large areas of sagebrush should be left intact in a mosaic pattern within the boundaries of the disturbance. It is much better to change the contour of the hillside by having deeper soils in some areas than other than to try than to try and recover the sagebrush.
- All topsoil should be sequestered and spread on the fill after it is placed.
- Native seed should be required for all grasses, forbs and shrubs. The excuse that native species are unavailable is not true. Perennial forbs and shrubs selected should be able to survive without water once established except within the irrigated half acre area allowed by state law.
- Seed sources and species, seeding rates and timing to be used in the revegetation should be clearly specified by the Landscape Architect and confirmed by the LA and county prior to seeding.
- Seeding should occur in the fall. Perennial species require a freeze thaw cycle to germinate. Sagebrush seed should be collected on or near the site in September or early October and spread on the snow in late November or December. Other purchased native perennial forbs and grasses can be seeded and raked into the hillside in late September or early October before the first snows. *It should be noted that when seed fails to germinate it is unlikely that a spring seeding of sagebrush or perennial forbs will be successful.*
- Water must be provided weekly, perhaps bi-weekly for the first growing season once snow is gone and seed has germinated the following Spring.

I also agree with Diane Barker that the costs of the project used to establish the amount of the bond should be carefully determined by getting 2 estimates from established landscape companies knowledgeable in native restoration techniques. Maintenance costs for watering, weed control, over seeding and other tasks required for success should be include in the costs.

It appears to me that the choice to dump soil on this lot is an economic decision driven by the cost of trucking out excess material. As a landscape professional I understand the appeal of this solution and, as a resident of Indian Creek I also appreciate the economic benefits to me as a homeowner. It is my opinion however that in this case aesthetic and environmental benefits are more important than the economic benefits to the Indian Creek homeowners.

Thank you,

Kelley Weston, Kathleen Diepenbrock