



IDAHO DEPARTMENT OF FISH AND GAME

PANHANDLE REGION

2885 West Kathleen Avenue

Coeur d'Alene, Idaho 83815

Brad Little / Governor

Ed Schriever / Director

February 5, 2020

Ms. Michelle Norton
Sandpoint Ranger District
1602 Ontario Street
Sandpoint, ID 83864-9509

REFERENCE:

BUCKSKIN SADDLE INTEGRATED RESTORATION
PROJECT

Dear Michelle:

Idaho Department of Fish and Game (IDFG) has reviewed the above project, which involves, timber harvest, prescribed burning, and road and trail improvements in a 50,663 acre area from Packsaddle Mountain to the Montana border. This project in the Sandpoint Ranger District is intended to improve forest resiliency, aquatic and wildlife habitat, and scenic views. The purpose of these comments is to assist the decision-making authority by providing technical information addressing potential effects on wildlife and wildlife habitat and how any adverse effects might be mitigated.

The Buckskin Saddle Integrated Restoration Project is intended to establish resilient forest stand structure and species composition with a proposed 19,869 acres of vegetation treatment. Treatment of grand fir, Douglas fir, and lodgepole pine stands, both inside and outside of the inventoried roadless areas, is the first step to improving forest health and reducing wildfire risk. Planting treated areas with western white pine, ponderosa pine, and western larch will help trend the forest to historic conditions and produce stands that are more resilient to root diseases, drought, and wildfire events. The 331 acres of proposed whitebark pine restoration should benefit a tree species that has been declining across the West and the Clark's nutcracker, an Idaho species of greatest conservation need. Thinning and burning Ponderosa pine stands will reduce competing fir trees and benefit wildlife dependent on this dry site tree species, such as the flammulated owl.

Roughly one third of the Buckskin Saddle project area is within a medium priority area for summer range elk habitat improvements. The direction for this elk priority area is to increase the amount of early successional habitat, specifically grasses, forbs, and shrubs. The timber harvest treatments, including seed tree and shelterwood, account for 12,692 acres. These types of harvest should increase the amount of forage available to big game for several years. The increase in forage availability outweighs the minimal short-term decrease in elk security in EMU 4A-2 and 4A-3. Openings larger than 40 acres will likely improve the establishment of non-shade tolerant species. While there are harvest units of various sizes, many units are adjacent to one another. It would be beneficial to many wildlife species if forested corridors are left within large units and between small adjacent units. We also encourage the use of clumped leave trees, reserves, and peninsulas in large openings to provide islands of wildlife habitat and visually smaller opening sizes.

The 2016 State Wildlife Action Plan identified altered fire regimes in this area as a very high threat to Idaho's conservation goals. The Buckskin Saddle Project includes almost 5,000 acres of prescribed burning, which is congruent with State strategies to address this threat. Also, the proposed burns would occur in important elk habitat. IDFG believes mimicking natural fire processes, through summer/fall burns where conditions allow, will greatly benefit wildlife. Prescribed fire in the summer can burn more of the duff layer allowing for a longer period of early seral habitat in following years and may expand brush fields into encroaching timber. Prescribed and lightning caused fires can enhance grass and shrub production, which should benefit many ungulate species. Re-seeding native grasses following prescribed burn treatment may be an effective tactic to reduce recolonization by invasive weeds and to increase big game forage.

The project encompasses four drainages that have been listed as impaired by the Idaho Department of Environmental Quality; Johnson Creek, Twin Creek, Dry Creek and Granite Creek are all listed as temperature impaired and Twin Creek and Granite Creek are listed additionally for sediment. The road improvements and maintenance within this project will help to ensure proper drainage, prevent sedimentation, and reduce the daily sediment load into these already stressed systems. These improvements align with IDFG's fisheries management plan, as they will improve fisheries habitat for these important drainages.

Granite Creek and Johnson Creek are important bull spawning and rearing habitat for bull trout. Westslope cutthroat, a species of concern in Idaho, inhabit almost all of the riverine habitat found within the project area. Additionally, we maintain a kokanee weir and spawning facility at the mouth of Granite Creek, which provides kokanee eggs to the Cabinet Gorge hatchery. This hatchery is important to our management of Lake Pend Oreille's kokanee population. IDFG has a considerable investment in habitat restoration work on the lower reach of Twin Creek to improve connectivity to the Clark Fork for fluvial salmonids. Both bull trout and cutthroat with fluvial life histories use these streams for spawning and rearing, which emphasizes the need to maintain connectivity to the Clark for and Lake Pend Oreille. Unmaintained and improperly designed culverts and roads can inhibit these migrations. The road maintenance in this project seeks to mitigate some of these issues and provides better connectivity. We suggest that when a road is stored that the culverts are pulled to prevent them from failing from lack of maintenance and creating fish barriers. High road densities without adequate maintenance and drainage mechanisms pose a risk to fish habitat.

The Buckskin Saddle project includes 30.4 miles of new roads that will be stored once the project is completed. New road construction increases the potential for sediment delivery to streams and increases invasive weed issues. IDFG encourages the USFS to try to identify areas where new roads, particularly if they include stream crossings, can be eliminated. There appears to be several treatment units where this would be possible with a minimal reduction in treatment area. The project also includes decommissioning, storing, and reconstruction of roads. We understand that storing instead of closing the newly built roads will allow access to manage the new stands of pine and larch. However, we recommend using front end obliteration instead of gates on any new roads unless administrative access will be needed continuously. Illegal use of newly constructed roads is one of the biggest concerns from a wildlife and habitat security issue. People remove and bypass gates, thus making an area much less secure for all wildlife, including elk. Front end obliteration will reduce the illegal use of closed roads and provide the desired wildlife security. Decommissioning roads with illegal motorized use will provide wildlife security. Both decommissioning and storing roads should have a positive effect on water quality and aquatic habitats. These changes to the road system will benefit fish, including native westslope cutthroat trout, and other aquatic organisms by improving the hydrologic function of the drainage.

The Buckskin Saddle project proposes culvert removal and road improvements to reduce stream sedimentation. Re-routing a portion of the 2711 Road away from Granite Creek will reduce sedimentation and improve aquatic and riparian habitats. These watershed restoration tools along with road decommissioning should result in a reduction in sedimentation and improvements in fish habitat in the Johnson and Granite Creek drainages.

USFS hydrologists have documented that openings of 40 acres or more, if on south to southwest facing slopes, and below 3,500 feet, can contribute to flashier flows during rain on snow events, and result in flood damage and large sediment accumulation in stream channels. Those impacts are buffered if road systems are hydrologically stable and riparian zones can effectively intercept runoff. USFS riparian habitat conservation areas are typically suitably protective. However because sediment and/or temperature are already limiting to these watersheds, we recommend conservative design features to prevent further degradation. These features may include expanding the INFISH buffer width of 300 ft. slope distance and excluding any tree removals in the riparian zone where large clearcuts are planned higher in the watershed. We also recommend using standard INFISH buffers on all precommercial thin units.

Overall, the proposed project aligns with many IDFG objectives for managing the fish and wildlife populations in Unit 4A. Proposed actions are expected to improve game populations that make this area a premiere hunting destination in northern Idaho. Additionally, managing for a more historic disturbance regime will improve forest health and the many fish and wildlife species that depend on a resilient ecosystem. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Charles E. Corsi', with a stylized flourish at the end.

Charles E. Corsi
Regional Supervisor

CEC:MH:lat

C: Paul Kline, IDFG, Director's Office
USFWS, Spokane