IDAHO DEPARTMENT OF FISH AND GAME
PANHANDLE REGION
2885 West Kathleen Avenue
Coeur d'Alene, Idaho 83815

Brad Little / Governor
Ed Schriever / Director

April 21, 2020

Ms. Kerry Arneson
Coeur d'Alene Ranger District
2502 East Sherman Avenue
Coeur d'Alene, ID 83814

REFERENCE: HONEY BADGER PROJECT

Dear Kerry:

Idaho Department of Fish and Game (IDFG) has reviewed the above project, which involves timber harvest, prescribed burning, and trail improvements in a 42,000 acre area of USFS land from Canfield Mountain to Bernard Peak. This project in the Coeur d'Alene Ranger District is intended to improve forest resiliency, reduce fire risk, and provide varied options for trail users. 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 Honey Badger Project is intended to establish resilient forest stand structure and species composition with a proposed 12,000 acres of vegetation treatment. Treatment of grand fir, Douglas fir, and western hemlock stands 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 timber harvest treatments including clearcut, seed tree, and shelterwood account for the majority of the vegetation treatments. These types of harvest should increase the amount of forage available to big game for several years. 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. That said, large openings on south and west facing slopes at lower elevations (below 3500 feet) increase the potential for more rapid run-off during rain-on-snow events, which can overwhelm culverts and de-stabilize streamside roads. Implementing practices such as use of PacFish guidelines, in areas with large regeneration harvests meeting these criteria, that will buffer the effects of rain-on-snow events will be important to protect aquatic habitats for species such as westslope cutthroat trout.

The 2016 State Wildlife Action Plan identified altered fire regimes in this area as a very high threat to Idaho's conservation goals. The Honey Badger Project includes about 4,000 acres of prescribed burning, which is congruent with State strategies to address this threat. 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 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 Canfield Mountain area has a popular trail system used by a variety of motorized and non-motorized user types. The Honey Badger project aims to increase the sustainability of trails by decreasing user conflicts, minimizing stream crossings, and reducing erosion. The proposal includes new trail construction, reconstruction, and rerouting. Proposed trail changes should reduce sediment delivery to streams which would benefit fish habitat.

The Honey Badger project includes 35 miles of permanent road construction that will be stored once the project is completed. New road construction increases the potential for altering water delivery to streams during run-off events, sediment delivery to streams, and increased invasive weed infestations. 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. We recommend removing culverts before decommissioning and storing roads, this way both methods 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.

Overall, the proposed project aligns with many IDFG objectives for managing the fish and wildlife populations in Unit 3. Proposed actions are expected to improve game populations in one of the most popular places to hunt big game in the Panhandle. 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,

CEC by Craig L. Walker

Charles E. Corsi
Regional Supervisor

CEC:MH:lat
C: Paul Kline, IDFG Director's Office