

## OFFICE OF SPECIES CONSERVATION

**BRAD LITTLE**  
Governor

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Administrator



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June 10, 2021

New Meadows Ranger District  
Attn: Cold July Project  
P.O. Box J  
New Meadows, ID 83645

RE: Cold July Forest Restoration Project

Dear Forest Supervisor Linda Jackson,

The State of Idaho, through the Idaho Governor's Office of Species Conservation (OSC) appreciates the opportunity to provide comment on the Payette National Forest's (PNF) Cold July Forest Restoration Project. The project aims to provide a landscape-scale level treatment across ownership boundaries to enhance forest stand structure and resiliency as well as wildlife habitat in the New Meadows and Council Ranger district of the PNF.

The proposed project to conduct prescribed burning, commercial timber harvest, and non-commercial thinning in portions of the Lost Creek, Upper West Fork Weiser River, Lower West Fork Weiser River, Upper Weiser River, Warm Springs Creek-Weiser River, North Fork Hornet Creek watersheds is consistent with the missions and management goals of OSC. In addition to the benefit of reducing wildfire threat to local communities, the implementation of this project increases insect and disease resiliency and reduces the impact to threatened and sensitive species due to severe wildfires. Below are comments and concerns that the PNF should consider as they move forward in the planning process.

### **Comments Regarding Northern Idaho Ground Squirrel (NIDGS):**

The northern Idaho Ground Squirrel (NIDGS) is currently federally listed as threatened pursuant to the U.S. Endangered Species Act (ESA). Biologists have observed this sensitive species responding positively to habitat restoration at certain locations, especially on the PNF. The results of this project include benefits to NIDGS by providing more suitable habitat of open timber stands. Overall, it appears that the necessary precautions are being considered for the modeled and occupied NIDGS habitat as well as hibernation periods to reduce effects of prescribed fire. OSC appreciates the design features put in place to ensure burning are conducted only during periods of NIDGS hibernation. We would like to recommend that this provision clarifies that all age classes must be in hibernation in order to mitigate impacts. Young of the

year will often stay active for at least a month after adult NIDGS have gone underground, and therefore any scheduled activities should be planned around the last ground squirrels entering hibernation, and not based on average adult hibernation timing. It is also important to note that timing of hibernation will vary across different elevation gradients, and therefore OSC recommends consultation with a wildlife biologist prior to implementation of any ground disturbing activities to ensure ground squirrels are not still active within the proposed area.

### **Comments Regarding Other Sensitive Species:**

Several additional species of greatest conservation need (SGCN) exist within the project limits. SGCN species should continue to be accounted for with detailed design criteria in these plans moving forward to help minimize short-term impacts to these species.

#### *White-headed woodpeckers*

This project includes improving habitat, where found, for white-headed woodpeckers, a Tier 3 species of greatest conservation need (SGCN). The results of this project may create or maintain preferred habitat conditions for the white-headed woodpeckers by: 1) reducing canopy cover of later seral species, 2) promoting growth of the medium tree size class into the large tree size class (TSC), and 3) encouraging the recruitment of snags in a mosaic pattern of open and closed canopy covers. However, we note that approximately 93 acres of existing white-headed woodpecker habitat are proposed for commercial timber harvest, but it is not stated if biologists or wildlife specialist will be consulted prior to treatment to assess impacts on nesting cavities or other impacts due to treatment. We would also like to recommend that this provision clarifies if and how other forms of treatment, such as non-commercial thinning and prescribed fire will be used within known white-headed woodpecker habitat.

#### *Monarch*

This project includes improving habitat, where found, for monarchs who received a warranted, but precluded status under the ESA in December of 2020. OSC supports this initiative with the suggestion that the botanist, wildlife biologist, and fuels specialist would work together to design a burn to improve monarch habitat in that area.

#### *Fisher*

While this project notes that there are Fisher, a Tier 2 SGCN and Region 4 sensitive species, present in the project area, it is not stated how these treatments are likely to impact the species. Fuel reduction will likely benefit fisher populations by reducing the threat of catastrophic fire. However, OSC would like to suggest an initiative that botanist, wildlife biologist, and fuels specialist would work together to design a burn to mitigate severe negative impacts on fisher. In terms of the short-term impacts on fisher habitat, studies have shown that early season burns may be preferable to late season burns, but should occur after the fisher denning period (mid-March through mid-May; Thompson and Purcell, 2016). Further, where spring burns are conducted in areas potentially occupied by fishers there are measures to mitigate smoke accumulation in tree cavities that can be implemented.

*Northern goshawk and other migratory birds*

The mosaic nature of the project will still maintain available Northern goshawk nesting trees in the long term, despite the possibility that potential nesting trees may be affected in the short term. Additionally, having a contingency plan to cease burning if a nesting site is found is beneficial to Northern goshawk and other migratory birds.

*Columbia spotted frog*

Prescribed fire can act directly (e.g., fire-related mortality) or indirectly (e.g., habitat alterations) to have positive and negative impacts on amphibians such as the Columbia spotted frog. Knowledge of the phenology of these frog populations can aid in evaluating potential impacts as prescribed burns may take place during active periods of breeding or migrating when they would be more vulnerable to fire-related mortality. As stated, the project will account for stream buffers and protocols to prevent landslides and sedimentation events. OSC suggests consultation with a wildlife biologist prior to timber harvest and thinning in project areas within or near breeding pools and within migration corridors. This will provide that the necessary precautions are being taken to prevent unintended impacts to this aquatic organism and their habitat.

**Additional comments:**

Project design feature entitled “Botany 5” should be expanded in scope to prevent the establishment of invasive plant species during the implementation of all project activities, not just in habitat occupied by threatened, endangered, sensitive, proposed, candidate, or watch plant species habitat. An additional project design feature under the Botany category could include conducting a survey in non-forested and in potential vegetation groups with ponderosa pine to assess invasive annual grass status before or following prescribed fire treatment.

OSC suggests clarifications regarding the details of non-commercial thinning. For example, does the project support non-commercial thinning that would favor retention of early seral species (western larch, ponderosa pine, Douglas-fir, and quaking aspen) while retaining a mix of species and spatial heterogeneity?

We suggest including a consultation with all relevant state agencies such as Idaho State Historic Preservation Officer and appropriate Tribal Historic Preservation Officer prior to project implementation.

If you have any questions regarding these comments, please contact: OSC’s Federal Land Coordinator Jace Hogg at 208 – 332 – 1553; [jace.hogg@osc.idaho.gov](mailto:jace.hogg@osc.idaho.gov).

Sincerely,



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/s/ *Mike Edmondson*  
MIKE EDMONDSON  
Administrator

Reference:

Thompson, C.M., Purcell, K.L. (2016) Conditions inside fisher dens during prescribed fires; what is the risk posed by spring underburns? *Forest Ecology and Management* 358; pg 156-161