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

Brad Little / Governor
Jim Fredericks / Director

October 3, 2024

St. Joe Ranger District
Attn: Amy Thompson
222 South 7th Street, Ste. 1
St. Maries, Idaho 83861

REFERENCE: LACY LEMOOSH EA

Dear Amy,

Idaho Department of Fish and Game (IDFG) has reviewed the above project, which includes timber harvest, prescribed burning, and water quality improvements in a 16,100-acre area including the Hume Creek and Lacy Creek drainages south of Emida. This project in the St. Joe Ranger District is intended to improve forest resiliency and reduce fuel loads as well as improve aquatic habitat. 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 Lacy Lemoosh Project is intended to establish resilient forest stand structure and species composition with a proposed 3,700 acres of vegetation treatments including timber harvest, precommercial thinning, and prescribed burning. Roughly a quarter of the project area will be treated providing a mosaic of habitat types within these watersheds. Treatment of grand fir and Douglas fir stands is the first step to improving forest health and reducing wildfire risk. Planting treated areas with western white 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 Lacy Lemoosh project area is an area important for big game species such as elk, moose, and white-tailed deer. The timber harvest treatments including seed tree and shelterwood, account for 2,629 acres. 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. It would be beneficial to many wildlife species if forested corridors are left within large units (such as Openings 1 and 6) 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 7-acre aspen treatment along Charlie Creek should benefit the many wildlife species that use aspen habitat. We encourage conifer removal from other aspen stands that are encountered within the Lacy Lemoosh project area.

The 2015 State Wildlife Action Plan identified altered fire regimes in this area as a very high threat to Idaho's conservation goals. The Lacy Lemoosh Project includes 715 acres of prescribed burning, which is congruent with State strategies to address this threat. The project also includes 210 acres of fuel breaks, which should help provide protection to neighboring private land in the case of a wildfire. 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 or forbs following prescribed burn treatment may be an effective tactic to reduce recolonization by invasive weeds and to increase big game forage.

The Lacy Lemoosh project includes 15 miles of new road construction plus 11 miles of temporary road construction, which is a reduction in 12 miles of road proposed during scoping. This reduction in road construction will reduce the potential for sediment delivery to streams. The project also includes decommissioning (25 miles), storing (5 miles), and reconstruction of roads (20 miles). Of those 15 miles of new roads, some will be gated or barriered, potentially decreasing wildlife security. 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. Three stream crossings and one bridge crossing will be replaced to allow aquatic organism passage. These changes to the road system will benefit fish and other aquatic organisms by improving the hydrologic function of the drainage.

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 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 pre-commercial thin units.

Overall, the proposed project aligns with many IDFG objectives for managing the fish and wildlife populations in Unit 6. Proposed actions are expected to improve game populations that make this area a destination for hunting 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,

Carson Watkins Digitally signed by Carson Watkins Date: 2024.10.03 15:38:29 -07'00'

Carson Watkins
Regional Supervisor

CEC:MH:lat
C: eFile M:\

Golder Associates. 2006. Final Report on Gold Creek and Chloride Gulch Stream Channel Assessment. 053-1545.004.