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First name: Carson
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Organization: Idaho Department of Fish and Game
Title:
Comments: Dear Chris,

Idaho Department of Fish and Game (IDFG) has reviewed the Sandpoint South Project, which includes timber harvest, prescribed burning, and fuel breaks in a 174,000-acre area that encompasses private lands, IDL, and BLM property intermixed with USFS property. This Sandpoint Ranger District project is intended to reduce fuel loads and improve forest resiliency. The purpose of these comments is to assist the decision-making authority by providing technical information that can be used to minimize fish and wildlife impacts.

The Sandpoint South Project is intended to reduce wildfire risk to local communities and establish resilient forest stand structure and species composition with a proposed 8,330 acres of vegetation treatment. Treatment of lodgepole, 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 2023 Idaho State Wildlife Action Plan lists voluntary actions intended to benefit Idaho[rsquo]s Species of Greatest Conservation Need in the forest habitats, such as mesic lower montane forest and aspen forest and woodland, found in the Sandpoint South Project area. These actions include reducing the risk of destructive wildfire through fuel reduction treatments, improving forest health through vegetation management, and managing forests by keeping diverse, fire-resistant and mature forest characteristics, such as mixed patch sizes, varied tree sizes and densities, large snags and logs, and downed woody debris.

The Sandpoint South project area is important for big game species including elk, moose, and white-tailed deer. The regeneration harvest treatments account for 3,400 acres, which 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 tree species but reduce wildlife security cover. While there are harvest units of various sizes, many units (Units 8, 73, 288 and 67; Units 151, 135, 17, 72, and 104; Units 15, 4, 92, and 117; Units157-161 and 80) are large and/or adjacent to one another. It would be beneficial to many wildlife species if forested corridors were 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 goals of regenerating and expanding aspen stands within the Sandpoint South project area will benefit a diversity of wildlife species.

The 2023 State Wildlife Action Plan identified altered fire regimes in forested habitats as a challenge to Idaho[rsquo]s conservation goals. The Sandpoint South Project includes 1,540 acres of prescribed burning, which is congruent with State strategies to address this challenge. 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 subsequent years and may expand brush fields into encroaching timber. Prescribed fires can enhance grass and shrub production, which should benefit ungulate, upland bird, migratory bird, and small mammal species. Re-seeding native grasses or forbs following prescribed burn treatment is an effective tactic to reduce recolonization by invasive weeds and to increase big game forage.

The project includes 7 miles of new road construction (to be stored or with restricted access) plus 0.5 miles of temporary road construction. Road construction increases the potential for sediment delivery to streams. 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 is needed continuously. Illegal use of newly constructed roads is one of the biggest concerns for wildlife habitat and security. People remove and bypass gates, thus making an area much less secure for all wildlife, but particularly elk which respond negatively to motorized traffic. Front end obliteration will reduce the illegal use of closed roads and decommissioning roads with illegal motorized use will provide the desired wildlife security. Additionally, both decommissioning and storing roads should have a positive effect on water quality and aquatic habitats.

Overall, the proposed project aligns with many IDFG objectives for managing the fish and wildlife populations in Unit 2. 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.

Carson Watkins

Panhandle Regional Supervisor