



IDAHO DEPARTMENT OF FISH AND GAME  
SOUTHWEST REGION  
15950 N. Gate Blvd.  
Nampa, Idaho 83687

Brad Little / Governor  
Ed Schriever / Director

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 Idaho Department of Fish and Game (IDFG) has reviewed the Scoping Document (Document) and supporting information for the Cold July Forest Restoration Project (Project). The Project aims to improve the health of forest stands over a 29,117 acre project area while simultaneously enhancing habitat for Northern Idaho ground squirrels (NIDGS) and white-headed woodpeckers.

The purpose of these comments is to assist the Payette National Forest (Forest) and the New Meadows Ranger District by providing technical information addressing potential effects on wildlife and wildlife habitat and how any adverse effects might be mitigated. Resident species of fish and wildlife are property of all Idaho citizens, and IDFG and the Idaho Fish and Game Commission are expressly charged with statutory responsibility to preserve, protect, perpetuate and manage all fish and wildlife in Idaho (Idaho Code § 36-103(a)). In fulfillment of our statutory charge and direction as provided by the Idaho Legislature, we offer the following comments and suggestions.

**Northern Idaho Ground Squirrels:**

Treatment A167: haul roads shown on the map, specifically the southern loop, occur in occupied NIDGS habitat. From our familiarity with the area, we do not recall roads that currently are suitable for hauling at this location. This presents a challenge as to when work could occur to open/upgrade these road prisms that would minimize disturbance to NIDGS.

Treatment A170 encompasses a high-priority site that is part of ongoing research to examine the response of NIDGS to thinning and burning. We encourage the forest to work very closely with the lead of this study, Dr. Courtney Conway, University of Idaho, to use this opportunity to fully achieve objectives for treatment. Past work at this site was unsuccessful at achieving objectives,

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in part because of lack of communication to the contractors. Treatment at this site is 8 years behind schedule.

Figure 3-7, Proposed commercial treatments that would potentially result in NIDGS habitat: the location of these treatments appears reasonable, in that these sites are adjacent to, or encompass, existing occupied NIDGS sites. However, a goal of 15 to 30 percent canopy cover, as stated on p. 15, likely will not produce high-quality NIDGS habitat. A recent analysis for a NIDGS Species Status Assessment used all known occupied sites to define high-quality habitat as <13% (IDFG, unpublished data). The ongoing research study led by the University of Idaho to examine NIDGS response to thinning and burning has a target of <15% canopy cover for treated sites (Allison et al. 2020). It should be recognized that proposed treatments likely would improve habitat for Columbian ground squirrels in addition to, or instead of, NIDGS. This was the case along the east side of Lost Valley Reservoir, where stands were thinned and burned to reduce canopy cover and improve forage for NIDGS. There was an initial response of NIDGS, but over time we observed a marked increase in the abundance of Columbian ground squirrels and a subsequent decrease in NIDGS. NIDGS need very open-canopied habitats. If prescriptions can't reduce canopy cover to optimum conditions for NIDGS, they only serve to increase habitat for its primary competitor. Perhaps one approach that could be explored is to strategically focus NIDGS treatments around openings (i.e., scabs) or around currently occupied sites to increase the area of those sites. Canopy cover could be reduced to 10% around openings, and left higher farther away from openings to compensate. We reiterate that suitable NIDGS habitat occurs primarily on southeast, south, and southwest aspects. Treatments on other aspects provide little benefit to NIDGS.

Design Features, Wildlife 1, specifies that landings would not be located in known occupied NIDGS habitat. We recommend that a distance be defined (perhaps 100 m) to provide a buffer from occupied habitat.

### **Aquatic Resources:**

As mentioned in the Document, there are no listed fish within the project area. Our review of aquatic impacts focused on new road building impacts (sedimentation) and/or riparian zone protection (stream temperature) within stream corridors. Section 4.9 discusses vegetation treatments within RCAs (riparian conservation areas), and states that treatments may occur within RCAs, and specifically that prescribed fire may occur directly within the inner half of RCAs and that incidental cutting of overhead canopy trees may occur. We appreciate the detailed SWRA design features aimed at mitigating sedimentation and erosion impacts to water quality. Our concerns related to the loss of vegetation within the riparian zone has to do with stream temperature effects. The Weiser drainage already suffers from elevated stream temperatures lower in the system due to loss of riparian habitat and irrigation withdrawal. Therefore, it is important to keep headwater riparian zones intact to keep the streams as cool as possible. If there is potential for loss of any riparian vegetation and overhead canopy within the project boundary, The EA should model those potential impacts to stream temperature.

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

Several additional Species of Greatest Conservation Need (SGCN) exist within the project limits. White-headed woodpeckers (a Tier 3 SGCN in the State Wildlife Action Plan) are another focal species of the project that stand to benefit from the project activities. The Document states that only 580 acres of modeled habitat exist within the project area, and there are no known nest sites or populations. We suggest providing a brief history of the survey efforts and habitat modeling done in the project area to support these findings. The Idaho Fish and Wildlife Information Systems database includes records of white-headed woodpecker observations within the project area. Complete surveys should be conducted in the project area prior to any treatment being implemented to ensure no nests are present.

The Project includes opportunities to create more open space and improve the diversity of forbs. We encourage the Forest to promote pollinator habitat in newly opened forest stands and along reclaimed roads and trails. Any necessary road reclamation or site stabilization work should use native flowering species likely to attract pollinators.

### **Comments Regarding Access for Sportsmen:**

The project area includes land within IDFG Game Management Unit 22. In addition to a variety of fishing and small game hunting opportunities, this unit offers popular big game hunting during many of the likely project implementation time periods. Over-the-counter hunts are available for black bear, mountain lion, deer, and elk within the unit. In 2020, IDFG estimated that 1519 deer hunters and 2599 elk hunters hunted in unit 22. The proposed project area includes nearly 30,000 acres of public land, much of which is likely frequented by sportsmen. Whether attempting to access land within the project boundary, or simply driving through the project area to access adjacent land, sportsmen's access in the general area may be impacted by project activities. We recommend the PNF take precautions to minimize the impact to recreationist's and sportsmen's access, particularly during the fall big game hunting season. As addressed in design feature Recreation 2, to the extent possible, popular roads and trails should be kept open, and advanced public notice should be provided for any planned closures.

We appreciate the opportunity to provide information pertinent to the proposed projects. Please contact Casey Pozzanghera in the Southwest Region office at (208)465-8465 if you have any additional questions concerning this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jon Rachael". The signature is fluid and cursive, with the first name "Jon" and last name "Rachael" clearly distinguishable.

Jon Rachael  
Southwest Regional Supervisor

JR/CBP

Reference:

Allison, A. Z. T., A. E. Morris, and C. J. Conway. 2020. Effects of Forest Encroachment on Behavior and Demography of the Northern Idaho Ground Squirrel: Annual Progress Report 2020. Wildlife Research Report #2020-03. Idaho Cooperative Fish and Wildlife Research Unit, Moscow, Idaho.