

Sandpoint Ranger District
Attn: Doug Nishek
1602 Ontario Street
Sandpoint, ID 83864

DATE

Subject: Chloride Gold Proposed Action

Dear Doug Nishek:

We are writing as members of the Panhandle Forest Collaborative (PFC) to comment on the proposed action for the Chloride Gold Project. The vision of the PFC is to assist agencies by bringing balanced approaches to timber, wild ecosystems and recreation and to contribute to the sustainable social, environmental and economic viability of our region. The PFC focuses on issues on the Idaho Panhandle National Forests (IPNF), primarily within the Sandpoint and Priest Lake Ranger Districts and a portion of the Coeur d'Alene Ranger District. Our goals include reducing litigation, promoting sustainable operations, enhancing travel and recreation opportunities, maintaining infrastructure for timber and recreation, and conserving native ecosystems. The PFC works to build consensus recommendations for projects and forest plans that address these goals.

The purpose of the Chloride Gold Project is to reduce the threat of wildfire to local residents, improve forest health, restore underrepresented tree species, improve fish and wildlife habitat, decrease sources of stream sediment, control noxious weeds, improve recreation opportunities, and benefit the local economy. In order to achieve these objectives, the Forest Service proposes approximately 9,000 acres of timber harvest, 2,800 acres of precommercial thinning, 5,400 acres of prescribed fire, 10 miles of road decommissioning, 24 miles of new road construction, 34 miles of trail work and elimination of fish passage barriers.

Watershed considerations

The PFC is generally supportive of the project objectives. However, there are members of the group that are concerned with the amount of timber harvest and road construction proposed, particularly in the Gold Creek Drainage where the acreage of proposed regeneration harvest is greater than twenty-five percent of the entire watershed. This percentage does not even include units where precommercial timber harvest and prescribed fire are proposed.

Hydrologists have documented detectable changes in the timing, volume and duration of peak flows in watersheds where recent timber harvest exceeded twenty percent equivalent clearcut area (ECA). Significant changes in the timing, volume and duration of peak flows could adversely impact water quality and fish habitat by increasing erosion, flushing large pulses of substrate through the system, and scouring spawning sites. This would be particularly problematic in the lower reaches of Gold Creek and the North Branch of Gold Creek, which are

utilized by bull trout for spawning and are designated as “critical habitat”. Gold Creek is the third most important tributary for bull trout spawning in the Pend Oreille Basin.

As such, the PFC recommends that the Forest Service limit ECA in any given watershed to twenty percent or less. Recognizing the desire to treat more acreage, the Forest Service could consider staggering treatments in watersheds where proposed harvest would exceed twenty percent ECA. Units would have to be staggered such that the initial harvest units would have time to regenerate to a condition where it would be possible to treat additional units without exceeding the twenty percent ECA threshold.

If the Forest Service chooses to stagger the timing of harvest as we recommend, then the PFC would like to see the staggered approach outlined in the environmental analysis. This should include a map illustrating when individual units will be harvested (e.g. units a, b, and c will be harvested in years one through ten and units, x, y, and z will be harvested in years ten through twenty). A staggered operational plan should also be supported in the environmental analysis by showing the Forest Service’s methodology for calculating ECA. These are the kinds of assurances that some members of the PFC will need in order to support the amount of timber harvest proposed.

The PFC would also like to incorporate the recommendations of Golder Associates (2006), who conducted an assessment of Gold and Chloride Creeks for Avista. They located several springs that benefit bull trout spawning on the eastern bank of Gold Creek below West Gold Creek and above Kick Bush Gulch. In order to protect water quality and spring flow, Golder Associates recommend, among other things, the following:

- No significant land management activities (e.g. timber harvest, road building) within at least 500 feet of the springs.
- Development of site specific BMPs for land management activities (e.g. timber harvest, road building) within 1,000 feet of the springs.
- Management of Kick Bush Slide area to minimize sediment input to Kick Bush Gulch and Gold Creek, including consideration of an alternate alignment of USFS Road 278.
- Sediment control BMPs for mine reclamation or road building/maintenance activities in the watershed near streams to minimize sediment loading.
- Removal and stabilization of the tailings and mine waste rock material in and adjacent to the Gold Creek stream channel and the Conjecture Mine site.

The amount of proposed road construction is also a concern to some members of the collaborative. As the agency is aware, roads can impact water quality, fish and wildlife. We certainly appreciate the fact that any newly constructed roads would be stored and closed to public motorized travel. However, we encourage the Forest Service to reevaluate the amount of road construction that is necessary to carry out the project. We also encourage the agency to consider opportunities to realign roads that are contributing sediment to streams but are desirable to keep open for public access or management. The PFC would also like the Forest

Service to consider using temporary bridges where newly constructed roads cross streams in lieu of building full road prisms in riparian areas.

The PFC would also like assurances that the watershed restoration components of the project are implemented. We are aware of examples of other projects where the watershed restoration components were not implemented due to a lack of funding. If funding is an issue, then we recommend utilizing the Forest Service's stewardship contracting authorities to ensure that watershed restoration work is completed.

Old growth

The PFC assumes that the Forest Service intends to follow the old growth management direction contained in the Forest Plan. However, there was no mention of old growth in the scoping notice for the Chloride Gold Project. While treatments could be carried out in drier old growth types, no treatment should result in changes to an old growth stand that would disqualify the stand from the old growth inventory.

Rare plants

There are populations of clustered lady's slipper in the project area. The scoping notice indicates that the Forest Service will monitor "the effects of various vegetation and fuel treatments on the species while still affording ample conservation protection measures." Members of the PFC that were involved in efforts to survey the project area for clustered lady's slipper recalled that there are approximately five acres where this species is present in the project area. If this is accurate, then the PFC suggests buffering these populations from potentially negative impacts from timber harvest and prescribed burns. Potential impacts on these populations should be outlined in the environmental analysis.

Recreation

The Chloride Gold Project area is a popular recreational destination, particularly for motorized recreation. The PFC appreciates and supports proposals to perform trail maintenance, reduce sediment at stream crossings and make other recreational improvements. In addition to the proposals listed in the scoping notice, the PFC recommends evaluating opportunities to fully eliminate stream crossings by relocating trail segments to one side of the creek or the other where it is feasible to do so. This may be more costly in the short term, but in the long term, the elimination of stream crossings will reduce the amount of future maintenance needed while benefiting water quality and fish. Trails 111 and 113 are two routes to consider.

The Forest Service should also consider changing motorized trail designations to promote consistent use patterns across entire trails. In particular, the agency should change the designation of the lower end of Trail 111 from open to OHVs to open to motorcycles only so that the designation is consistent across the length of the trail. We recognize, of course, that changing the designation of any portion of the lower end of Trail 111 is dependent on the identification of a practical location to do so.

Finally, the PFC would like to work with the Forest Service to identify a non-motorized route to the top of Pack Saddle Mountain. There are very few non-motorized trails in the area. With four motorcycle trails providing access to the top of the mountain, providing a non-motorized trail would not eliminate motorized access to the summit.

Conclusion

The PFC appreciates the opportunity to provide these recommendations to the Forest Service. We would like to invite Jessie Berner and her project team to attend the PFC's January 18th meeting to discuss our recommendations. We look forward to continued engagement in the project as the planning process moves forward.

Sincerely,

/S/Liz Johnson-Gebhardt
Co-Chair

/S/Mike Petersen
Co-Chair