

OFFICE OF SPECIES CONSERVATION

BRAD LITTLE
Governor

MICHAEL R. EDMONDSON
Administrator



P.O. Box 83720
Boise, Idaho 83720-0195

304 N. Eighth Street, Suite 149
Boise, Idaho 83702-5833

January 12, 2023

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

RE: State Chloride Gold Scoping Comments

Dear District Ranger Berner,

The State, coordinated through the Idaho Governor's Office of Species Conservation (OSC), appreciates the opportunity to provide comments on the United States Forest Service (USFS) proposal for the Idaho Panhandle National Forest's Chloride Gold Restoration Project.

This project is looking to address the forest health and wildfire risk issues based largely on the history of fire exclusion within the 43,000-acre project area, which is adjacent to private properties and power line infrastructure. Project objectives include fuels reduction through prescribed fire, commercial timber harvest, non-commercial thinning; improving motorized and non-motorized experiences, improving habitat quality for flammulated owls, harlequin duck, elk, and other ungulates, decreasing sediment sources to maintain or improve water quality and aquatic habitat for ESA listed bull trout, and other societal and environmental benefits. This effort compliments adjacent forest health projects such as the Honey Badger and Buckskin Saddle projects, creating a landscape level approach to forest management through practices and strategies called for in the [Western Governors Association Policy Resolution 2023-01](#).

Attached with this document are specific comments from the Idaho Department of Fish and Game and Idaho Parks and Recreation.

OSC is dedicated to planning, coordinating, and implementing actions within the State of Idaho that will preserve, protect, and restore species listed as threatened, endangered, or candidate while taking into consideration the state's economic vitality and values. If you or your staff have any questions regarding these comments, please contact my Federal Lands Coordinator, Jace Hogg at 208 332 1553; jace.hogg@osc.idaho.gov

Sincerely,

A black rectangular box redacting the signature of Mike Edmondson.

/s/ Mike Edmondson
MIKE EDMONDSON
Administrator



IDAHO DEPARTMENT OF FISH AND GAME

PANHANDLE REGION

2885 West Kathleen Avenue

Coeur d'Alene, Idaho 83815

Brad Little / Governor

Ed Schriever / Director

January 9, 2023

Sandpoint Ranger District

Attn: Doug Nishek

1602 Ontario Street

Sandpoint, ID 83864

REFERENCE: CHLORIDE GOLD RESTORATION PROJECT

Dear Doug:

Idaho Department of Fish and Game (IDFG) has reviewed the above project, which involves, timber harvest, prescribed burning, water quality improvements, and road and trail improvements in a 43,000-acre area from Bernard Peak to Packsaddle Mountain. This project in the Sandpoint Ranger District is intended to improve forest resiliency and reduce fuel loads, as well as improve aquatic and wildlife 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 Chloride Gold Restoration Project is intended to establish resilient forest stand structure and species composition with a proposed 17,158 acres of vegetation treatment. Treatment of grand fir, Douglas fir, and lodgepole pine stands, both inside and outside of the inventoried roadless areas, is the first step to improving forest health and reducing wildfire risk. Planting treated areas with western white pine, ponderosa 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. Thinning and burning ponderosa pine stands will reduce competing fir trees and benefit wildlife dependent on this dry site tree species, such as the flammulated owl.

The Chloride Gold project area is an area important for elk. The timber harvest treatments including seed tree and shelterwood account for ~8,000 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. While there are harvest units of various sizes, many units, especially in the Gold Creek drainage, are adjacent to one another. It would be beneficial to many wildlife species if forested corridors are 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. If the harvest can be scheduled over at least a 10-year period, some of the units will have shrub and tree growth to provide security cover by the time the last units are harvested.

Keeping Idaho's Wildlife Heritage

The 2016 State Wildlife Action Plan identified altered fire regimes in this area as a very high threat to Idaho's conservation goals. The Chloride Gold Project includes over 5,000 acres of prescribed burning, which is congruent with State strategies to address this threat. Also, the proposed burns would occur in important elk habitat. 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.

There are documented populations of a rare plant, the clustered lady's slipper, in the Chloride Gold project area. This plant would likely benefit from being buffered from treatment activities including timber harvest and prescribed burning.

The Buckskin Saddle project includes 23.8 miles of new roads that will be stored once the project is completed. New road construction increases the potential for sediment delivery to streams. The project also includes decommissioning, storing, and reconstruction of roads. 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. These changes to the road system will benefit fish, including native Bull Trout, Westslope Cutthroat Trout, and other aquatic organisms by improving the hydrologic function of the drainage.

The Chloride Gold project proposes culvert removal and road improvements to reduce stream sedimentation. Adding structures to remove motorized vehicles from Gold Creek along Trails #677 and #1078 should benefit Bull Trout habitat. These watershed restoration tools, along with road decommissioning, should result in a reduction in sedimentation and improvements in fish habitat in the Gold, Canyon, and Cedar Creek drainages.

USFS hydrologists have documented that opening 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/or temperature are already limiting to these watersheds, we recommend conservative design features to prevent further degradation. These features may include expanding

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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 precommercial thin units.

An assessment of Gold and Chloride Creeks was completed by Golder Associates for Avista (2006) looking at ways to improve bull trout habitat. They located several springs on the east bank of Gold Creek (below West Gold and above Kick Bush Gulch) that benefit bull trout spawning. The assessment recommended that no significant land management activities (e.g., timber harvest, road building) occur within 500 feet of the springs, and that site specific BMPs for land management activities within 1000 feet of the springs be developed. Additionally, the Kick Bush Slide area should be managed to minimize sediment input to Kick Bush Gulch and Gold Creek, and that tailings and mine waste rock material near Gold Creek and the Conjecture Mine site should be removed and stabilized. A digital copy of the assessment will be included with IDFG's comments.

Overall, the proposed project aligns with many IDFG objectives for managing the fish and wildlife populations in Unit 4A. Proposed actions are expected to improve game populations that make this area a premier hunting destination 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
Regional Supervisor

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C: eFile M:\

Literature cited:

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

TO: Idaho Panhandle National Forest

ATTN: Doug Nishek, Sandpoint Ranger District

FROM: IDPR, Recreation Bureau

BY: Alex Ernst, Land Access Coordinator (alex.ernst@idpr.idaho.gov)

RE: Chloride Gold Fuels Treatment Project Scoping (December 2022) Comments

DATE: 1/12/2023

Summary of IDPR Commentary

- Statement
- Trail Maps

Statement

The Idaho Department of Parks and Recreation (IDPR) staff has reviewed [the proposed project scoping documents](#) and appreciates the opportunity to comment.

IDPR's analysis of the December 2022 Scoping documents for this vegetation management project is narrowly focused on impacts and benefits of the proposed project on public recreational access values, particularly regarding wheeled-off-highway vehicle (OHV) access to trails encompassed by the analysis area.

IDPR's Motorized Trail Program has agreements with USFS Regions 1 and 4 to assist in the maintenance of all OHV trails under 50 inches in width on National Forest lands across the State of Idaho. IDPR's interest is to protect any capital and labor investments expended over the years to maintain the good condition of OHV trails across the state, and to assure continued access to these trails for its approximately 165,000 registrants who fund the activities of the Program.

As cataloged and mapped in the proposed Scope, IDPR recognizes several trails will need assessment and protection prior to and during treatments, and re-assessment for condition post-treatment. Generally, assets of concern in the proposed burn areas include water diversion structures, signage, bridges, and culverts. These should be inventoried prior to treatment, inspected for damage post-treatment, and then restored to good condition as part of the Project scope. Any activity or conditions resulting in a trail becoming unusable should be remediated prior re-authorizing public access. We request that the scope include budgeting for any needed remediation.

Specifically, Trail 111, Branch North Gold Creek, received significant capital and labor investments in reconstruction and improvements during the late 1990s. It will be important to identify and conserve these investments during the Project.

IDPR pledges its continued commitment under its agreements with Idaho's USFS Regions, through its Motorized Trail Program, to assist with ongoing maintenance needed to foster desirable experiences for OHV trail users. This can include lending assistance and expertise toward the proposed reroutes and reconstruction of existing trails, as well as restoration of other trails to usable condition after completion of the subject Project. Additionally, IDPR's Grant Program can assist with application to obtain funds for improvements.

Trail Maps

IDPR's interactive map of Summer Trails in the Project area: <https://arcg.is/1qvnOH1>

Screenshot of IDPR map left, and Visitor map per Scoping Notice page 1 right:

