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March 13, 2012

Ms. Mary Farnsworth, Forest Supervisor
KIPZ Revision Team
Idaho Panhandle National Forest
3815 Schreiber Way
Coeur d'Alene, ID 83815

Dear Mary:

REFERENCE: DEIS/PROPOSED LAND MANAGEMENT PLANS – IPNF

We have reviewed the Proposed Land Management Plan (Plan) and Draft Environmental Impact Statement (DEIS) for the Idaho Panhandle National Forest (IPNF). 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. It is not the purpose of Idaho Department of Fish and Game to support or oppose this proposal.

Forest plans ordinarily are revised on a 10-year cycle (or at least every 15 years) as required by Federal regulations (36 CFR 219.10(g), 1982). Therefore, to comply with Federal regulations, these documents incorporate new public issues, new desires, and new expectations of public land and resource management, and will revise and update the 1987 Forest Plan for the IPNF.

Seven topics are the primary focus for revision in the new Forest Plan:

- 1) **Access and Recreation.** One of the most controversial topics in forest management today is motorized and non-motorized use of National Forest lands. The 1987 Plan is outdated and doesn't provide adequate direction for contemporary issues, such as changes in technology, recreation demands, and shifts in management direction and procedures that have occurred over the past two decades.
- 2) **Vegetation.** Forest composition, structure, and pattern have shifted from historical conditions to the extent that ecosystems and forest products may no longer be sustainable.
- 3) **Timber Production.** Management direction in the 1987 Forest Plan emphasized timber production; however, management direction in the 1990s emphasizes ecosystem management and ecological sustainability.
- 4) **Fire.** New management direction is to restore and maintain fire-adapted ecosystems and expand the use of wildland fire (prescribed and wild) as a management tool.

Keeping Idaho's Wildlife Heritage

- 5) **Terrestrial Wildlife.** The 1987 Forest Plan needs to be updated to address several changes that have occurred in how both species and habitats are managed, and how these changes resulted in modifications of Forest management.
- 6) **Watershed and Aquatic Species.** The 1987 Forest Plan needs to be revised for watershed and aquatic dependent resources by establishing management directions that recognizes and emphasizes watershed restoration, and changes in the physical and biological components of the aquatic ecosystem.
- 7) **Recommended Wilderness.** Evaluating existing wilderness and areas for wilderness potential is a requirement of the Forest Plan revision.

Several other topics were identified that required updating to incorporate current science and data, as well as current law, regulation or policy.

Four alternatives are presented for evaluation. Each of the four alternatives retains existing decisions to the 1987 Forest Plan – Inland Native Fish Strategy (INFISH), Northern Rockies Lynx Management Direction Record of Decision, Motorized Access Management within the Selkirk and Cabinet-Yaak Grizzly Bear Recovery Zones, Energy Corridors on Federal Lands.

Alternative A is the no-action alternative. This alternative reflects the 1987 Forest Plan, as amended to date, and accounts for current laws and regulations.

Alternative B is the Proposed Action (Preferred) alternative. Alternative B would manage approximately five percent of the Forest as recommended wilderness, 27 percent as backcountry, and 60 percent as general forest.

Alternative C emphasizes wilderness values and protection of backcountry while moving towards desired conditions. Alternative C would have more opportunities for backcountry non-motorized recreation and more areas recommended as wilderness than any other alternative. Approximately 13 percent would be allocated to wilderness, 25 percent to backcountry, and 56 percent to general forest.

Alternative D emphasizes achieving desired condition through mechanical means. This alternative has the most acres available for timber production and motorized access. Sixty-three percent is allocated to general forest, approximately five percent would be allocated to recommended wilderness, and 25 percent would be allocated to backcountry.

Other Management Areas not specifically referenced (Special Areas, Research Natural Areas, Experimental Forests, Developed Recreation Sites, Utility Rights-of Way and Communication Sites, and Wild and Scenic Rivers) in the above listed alternatives are identical in the four alternatives. Additionally, Draft Forest Plan Goals, Desired Conditions, and Standards and Guidelines are identical as well.

Project level evaluations typically do not adequately address cumulative impacts and/or landscape level changes; thus, we concur that the approach identified in the Draft Plan, emphasizing watershed management, planning and implementation is a logical means to achieving the desired conditions. Sustainable watersheds support native fish and wildlife habitat and provide security for big game and other wildlife vulnerable to human encroachment. Providing habitat diversity and connectivity across the landscape for native and other desirable

wildlife is essential for providing opportunities for fishing, hunting, trapping, wildlife viewing and other wildlife related recreational activities. We recommend that cumulative impacts be fully considered at the project level, in order to ensure projects will meet the desired conditions at the landscape level as described in the Plan.

IDFG recognizes that many recreationists on the Forest, including sportsmen, appreciate and use roads and motorized trails to gain access to destinations for hunting, fishing, berry picking, sightseeing, and a host of other activities. The established system of motorized and non-motorized trails provide a variety of recreational and other opportunities, while affording protection for important fish and wildlife resources and the recreation they support.

IDFG also recognizes that roads can affect watershed function through compaction, groundwater intercept, and increased potential for high peak flows. Roads in floodplains or immediately adjacent to streams affect channel form and function and limit recruitment of large woody debris. Considering that “Funding has been well below that needed to annually maintain the entire road system at operational maintenance level standards.” decommissioning unnecessary roads would be the most effective option for reducing impacts from roads. Decommissioning that includes obliteration, culvert removal, and restoration of the original contour typically provides the most effective means to improve fish habitat, water quality, and habitat security for elk and other wildlife. Additionally, a number of studies including on the IPNF, have demonstrated that road densities less than 1.5 miles per section, with large blocks of secure areas retained, most effectively meet elk security needs. Clearly for the key aspects of the Plan to be effective, watershed restoration work will need to be funded – if not through sale receipts, then with other funds.

IDFG believes mimicking natural fire processes, to the extent possible, through summer/fall burns where conditions allow, will greatly benefit wildlife. Spring burns, if summer/fall burns are precluded, may also be effective at meeting habitat and fuel reduction objectives. Efforts by the Forest to expand the use of prescribed fire, and to take advantage of wildfire to meet landscape and vegetation objectives, will significantly improve conditions for big game and other wildlife, and support meeting IDFG objectives for elk.

Shrub fields, whether in uplands or lowlands, provide year-round highly nutritional forage for big game. During late summer and fall, big game animals use these areas to build up fat reserves necessary to survive harsh winter conditions. During spring green up, shrub fields provide the high nutrition forage necessary to recover from the demands of the previous winter. Burning will likely stimulate new growth that will in turn provide forage for big game and other species.

The loss of ponderosa pine forests has been associated with fire suppression. Ponderosa pine forests are an important habitat component across the landscape. Each successional forest stage is important to different species for feeding, cover, or reproduction. Mid-aged stands begin producing cones and provide some small snags that pygmy nuthatches, squirrels, and raptors utilize. Many habitat generalists, such as grizzly and black bear, turkey, elk, mule deer, bobcat, coyote, and northern goshawks, use all structural stages of ponderosa pine forests.

Snags and downed logs are an important component for nesting, roosting, foraging, and perching for a variety of species. We recommend that every effort be made to protect and retain snags and

downed logs from prescribed fire projects. Raking debris away (to the soil) from the base of snags can offer some protection from fire.

Prescribed burning (and wildfires) can reduce or completely remove vegetation, which may increase sediment delivery and peak flows to streams and impact stream biota as a result. Protecting stream function (including smaller streams) is critical to the survival of many species of fish and wildlife and to the health and stability of rivers and streams. Following INFISH standards, not only for fire related projects, but for all projects, will effectively protect streams and riparian areas. The procedures and direction provided by INFISH will not only provide substantial benefits to fish and other aquatic species, but will also provide benefits for a wide variety of terrestrial wildlife.

The INFISH direction specifically acknowledges that "... quality of water and fish habitat in aquatic systems is inseparably related to the integrity of upland and riparian areas within the watersheds..." Robust riparian habitat is critically important for maintaining water quality and a healthy aquatic habitat. Riparian vegetation has complex root systems that can withstand increased flows and slow bank erosion more effectively than stream banks that are sparsely vegetated. Additionally, the vegetation traps sediment, provides overhead cover that shades the stream and provides insects for food, and contributes large woody debris to the stream. Large woody debris in streams creates favorable fish habitat by forming pools, which can provide food, cover and resting areas for fish, as well as help to store sediment and retain spawning gravels. Retention of all trees with roots near stream banks, as well as those trees that lean over stream channels is recommended. Maintaining riparian buffers will protect tree species such as cedar, cottonwood and birch, as well as water quality, fish habitat, and habitat that big game and other species depend on for security and movement corridors.

Mining activities, including recreational mining (suction dredging, placer) can damage riparian vegetation, diminish water quality, and alter the stream channel if not properly conducted. Placer mining can cause extensive damage to flood plains and riparian habitat, and water quality is a concern. Stream channel alterations have the potential to significantly affect fish and wildlife resources over both the short and long term. Macro-invertebrates and other aquatic species inhabit stream bottoms, which provide food, nursery habitat, and hiding places. Fine sediment created by mining activities can cover the bottom gravel with silt, which can suffocate eggs, fry, and other aquatic organisms. In many cases these impacts are exhibited hundreds of feet downstream from the mining activity. Mining impacts can persist after mining activity has ceased, potentially impacting entire populations of fish. Ensuring that all recreational mining permits reflect specific timing restrictions and require properly maintained equipment (e.g., no fuel leaks, etc.) is a measure that could be incorporated into the Plan to minimize near-term and long-term effects to aquatic resources.

Livestock grazing can be detrimental to water quality, aquatic habitat and riparian areas if not properly managed. Cut-banks created by cattle grazing form along the stream courses, which yield fine sediments that are continually contributing into the stream creating imbedded cobbles and gravels. These conditions degrade streams and impair habitat for fish and insects. Riparian enclosures, shorter grazing periods, grazing systems that included resting and rotating use periods, and/or using herders and salting practices to keep livestock from congregating in riparian areas are all tools that can be employed to meet riparian and stream objectives if grazing

is affecting riparian and aquatic resources. IPNF may want to consider no net increase in AUMs and closing abandoned allotments unless livestock grazing is an option for achieving a desired condition, or shifting livestock from a currently used allotment to an abandoned allotment if there is need to reduce livestock-wildlife conflicts.

We are concerned about cumulative impacts, which can result from individually minor but collectively significant actions taking place over a period of time. A common goal of timber and wildlife managers is to maintain the long-term production capacity of forests, benefiting the forest industry as well as fish and wildlife. An important factor to consider when integrating timber and wildlife management practices to meet multiple objectives is the cumulative effects of present, past, and future harvest needs and goals over the landscape. Where timber production and harvest are appropriate landscape uses, using a mosaic timber harvest strategy on the landscape scale that considers the cumulative and additive effects of each harvest over time will help achieve this common goal.

Mosaic cutting has beneficial impacts both in the maintenance of wildlife habitats and on the aesthetic quality of forest landscapes. Wildlife species use a variety of age classes and timber densities to meet the basic requirements they need to subsist. For example, the northern goshawk, breeds in mixed conifer forests, but forages in a variety of habitats, and the great gray owl nests in forests but often forages in meadows within the forest. Maintaining large tracts of relatively undisturbed or older forest in close proximity to other forest fragments can encourage animals to move within and between desired habitats. Additionally, certain mammalian species such as pine marten and fisher, and numerous bird species depend on older stands for foraging, resting, and travel.

The size, shape and proximity to similar treatments are all important factors in considering a mosaic. When planning a harvest, maintaining areas equal to or larger than the proposed harvest site, generally within one mile, and composed of mature trees or regenerating trees that have grown to a height of ten feet, is essential. Leaving forested habitat at least ten feet high around each proposed harvest area will provide many wildlife species an opportunity to feed and move around while remaining unseen by predators. Balancing the amount of edge from each harvest over the landscape with the amount of contiguous forest remaining and the cumulative effects of different harvest practices over time is necessary to provide the best quality wildlife habitat while still meeting harvest objectives.

The EIS identifies approximately 21 additional miles of river as eligible for study as potential additions to the National Wild and Scenic River System. Alternatives B, C, and D identify the additional river miles as the Hughes Fork for scenery; recreation, wildlife, history, and botany, and the Kootenai for fisheries, wildlife, and botany. These newly identified river miles are in addition to the six eligible rivers and streams¹ identified in the 1987 IPNF Forest Plan and Amendment #3 for inclusion in the National Wild and Scenic River System. Efforts to pursue study of the newly identified segments (Hughes Fork and Kootenai) and continuing the process

¹ 1. Little North Fork of the Clearwater River for recreation, scenery, fisheries, and wildlife. 2. Little North Fork of the Coeur d'Alene River for fisheries. 3. North Fork Coeur d'Alene River for Scenery, Fisheries, Wildlife. 4. Coeur d'Alene River for recreation, fisheries, wildlife, and cultural. 5. Pack River for fisheries. 6. Long Canyon Creek for wildlife.

to bring the Upper Priest River², as well as the six other eligible rivers and streams before Congress for final designation could afford substantial conservation benefits for both fish and wildlife. In addition to the specific attributes assigned to each of the streams, most have recently been identified as critical habitat for bull trout. Placing the above listed stream segments under this classification, particularly segments classified as Wild Rivers or Scenic Rivers, would likely extend habitat protection for and benefit many fish and wildlife species.

The St. Joe and Little North Fork Clearwater river basins include essential habitat for bull trout, and support nationally recognized native westslope cutthroat trout fisheries. The Little North Fork Clearwater also supports a native redband trout fishery, which was not noted in the EIS. The Upper St. Joe River and the Little North Fork of the Clearwater River offer unique opportunities to fish for native trout in relatively pristine settings. This type of high-quality experience is sought after by both local and visiting anglers who target fishing trips for waters that not only have challenging opportunities, but are in a natural setting, and provide a measure of solitude.

The Little North Fork and the North Fork of the Coeur d'Alene River are also listed as eligible for Wild and Scenic River status in the 1987 IPNF Forest Plan and Amendment #3 as mentioned above. Both are managed by IDFG as quality westslope cutthroat trout fisheries and are very popular with anglers. Additionally, the IDFG State Fisheries Management Plan calls for continued collaboration with USFS to restore habitat to bolster the westslope cutthroat trout populations in the Spokane River basin. This system is an important component of westslope cutthroat trout habitat range-wide. Several research and restoration projects have been and are currently being conducted on the North Fork and the Little North Fork Coeur d'Alene Rivers. Petitions to have westslope cutthroat trout listed under ESA were denied in part because of the large, healthy populations supported by rivers and streams on the IPNF.

The Kootenai River (designated Critical Habitat) white sturgeon population is threatened by dam operations, flood control operations, water quality degradation and loss of habitat. Modifications of the sturgeon's habitat have changed the natural hydrology of the Kootenai River altering spawning, egg incubation, and rearing habitats, which contributes to reduced numbers of surviving young. Idaho Department of Fish and Game, The Kootenai Tribe of Idaho, Montana Fish, Wildlife & Parks, and British Columbia (BC) Ministry of Environment continue to be active participants in recovery implementation and coordination activities associated with regulating flows at Kootenai River hydroelectric projects to benefit Kootenai River white sturgeon. IDFG is currently working with the Kootenai Tribe to restore nutrient inputs to the river, and is supporting the Tribe's habitat restoration project in the river corridor above Bonners Ferry.

In addition to the white sturgeon, the only population of burbot in Idaho inhabits the Kootenai River. Burbot fisheries in the Kootenai River (Idaho and British Columbia) once provided important sport fishing and subsistence opportunities. The burbot population is in severe decline, primarily due to habitat degradation caused by the 1972 installation of the Libby Dam in Montana. Recruitment is primarily from the Goat River in British Columbia. Although a

² The Upper Priest River was determined suitable at the same time as the Upper St. Joe River – the process for designation before Congress was initiated but discontinued in 1993.

“spawning ball” was documented near Bonners Ferry during the winter of 2000-01, there is currently no evidence of successful reproduction in Idaho. Burbot harvest was banned in 1992.

Several research and restoration projects have been and are currently being conducted on the Kootenai River. Plans are currently being developed to implement a major stream restoration effort from the mouth of the Moyie River to Bonners Ferry in an effort to improve habitat in the Kootenai River. These efforts, and studies being conducted by Idaho Department of Fish and Game and the Kootenai Tribe of Idaho complement the continuing efforts to improve habitat and bolster the dwindling population. Because tributary spawning habitat is a limiting factor for Kootenai River salmonids, including westslope cutthroat trout, redband trout, and bull trout, measures to protect, enhance or restore these habitats on IPNF lands should benefit the Kootenai River fishery.

Information about sport fishing values is available as a result of a 2003 Idaho Department of Fish and Game mail survey of Idaho fishing license holders. Completed survey responses were used to develop statewide economic information about fishing in Idaho. In the five northern counties, which include the majority of the IPNF, \$52,139,346 was spent by anglers on fishing trips (Boundary \$2,739,638; Bonner \$24,637,855; Kootenai \$13,639,955; Shoshone \$8,439,539; and Benewah \$2,682,359) during the year of the survey. Waters within or supported by the IPNF result in hundreds of thousands of hours of angler effort each year.

Snow Peak Wildlife Management Area (SPWMA) is an excellent example of an area where cooperative wildlife management between IDFG and the Forest could make considerable improvements on a larger landscape level. This area burned in the massive 1910 fire and again in the 1930s, creating low elevation mountain shrub habitat that supported elk herds by providing important winter forage. SPWMA’s remote characteristics and proximity to the Proposed Mallard-Larkin Wilderness Area, the Upper St. Joe River Wild and Scenic River, and the Little North Fork of the Clearwater River, which is eligible for Wild and Scenic River designation, are consistent with the proposed Primitive Land designation. This proposed change would also address landscape level habitat connectivity, travel corridors and core areas for sensitive species such as wolverine, fisher, lynx, and grizzly bear.

The Scotchman Peaks (IPNF & Kootenai) and the Selkirk areas are both recommended for Wilderness designation in the plan. Wilderness designation would provide secure travel corridors in connection with the McArthur Lake Wildlife Corridor. Wilderness designation would protect large, undisturbed areas, which would provide security for wildlife habitat for interior forest species, while providing backcountry hunting and fishing opportunities but also brings other recreational and resource management challenges.

The documents lack clear discussion about the role of enforcement actions to prevent resource damage, minimize conflicts between user groups, and help ensure management objectives are met. Enforcement coupled with education about the resource effects of illegal activities will benefit both wildlife and recreationists.

IDFG values our management relationship with the IPNF, and we recognize the immense value of IPNF managed lands to fish and wildlife, and the wildlife based conservation and recreational values they provide. We concur with the usefulness of an adaptive management approach to

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land management and conservation efforts by the Forest Service to ensure sustainable native fish and wildlife populations that support hunting, fishing, and other wildlife based recreation at or above current levels. Our assessment is that although Alternative C protects more habitats, Alternative B allows for more active restoration, which is important particularly in areas where historic and recent resource damage has occurred.

I hope these comments are useful as you and your staff move forward, and as always, feel free to contact us with any questions or feedback. We look forward to working with IPNF on the implementation phase of the Plan.

Thank you for the opportunity to comment.

Sincerely,



Charles E. Corsi
Regional Supervisor

CEC:MTB:njk

C: Sharon Kiefer, Boise
USFWS, Spokane

File: USFS Proposed Land Mgmt Plans & DEIS IPNF 2012