



**IDAHO DEPARTMENT OF FISH AND GAME**

PANHANDLE REGION  
2885 West Kathleen Avenue  
Coeur d' Alene, Idaho 83815

C.L. "Butch" Otter/Governor  
Virgil Moore/Director

February 26, 2018

Mr. Ben Timchak  
St. Joe Ranger District  
222 South 7<sup>th</sup> Street, Suite 1  
St. Maries, ID 83861

Dear Ben:

REFERENCE: Proposed Brebner Flats

Idaho Department of Fish and Game (IDFG) has reviewed the above project, which primarily involves timber harvest in the Siwash and Kelley Creek drainages of the St Joe Ranger District. This project is intended to improve forest resiliency. The IDFG does not support or oppose this proposal. 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 Brebner Flat project is intended to establish resilient forest stand structure and species composition with a proposed 1,948 acres of vegetation treatment. Treatment of grand fir, Douglas fir, and lodgepole stands is the first step to improving forest health. 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.

The timber harvest treatments include clearcut with leave trees, seed tree with leave trees, and shelterwood. 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 shade intolerant species, creating an overall more diverse and resilient forest community. We encourage the use of clumped leave trees, reserves, and peninsulas in large openings to provide islands of wildlife habitat and visually smaller opening sizes. Irregularly shaped edges can also help create a more natural opening with decreased sight distances. Avoiding clearcuts greater than 40 acres on south facing slopes and below 3500 ft. will benefit water quality and the St. Joe fisheries that depend on it.

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The St. Joe River sport fishery is estimated to generate over \$4.1 million per year with 25,400 angler trips documented in 2003. Timber harvest and logging roads can have a major impact on bull trout and westslope cutthroat trout survival and reproductive success. Reducing sedimentation through road decommissioning, riparian buffers, smaller opening size, and trail use enforcement will go a long way toward protecting this valuable recreational fishery.

The Brebner Flat project area includes and is surrounded by a patchwork of private timber company property, some of which has been harvested recently. Early seral vegetation contributing to elk forage is not considered severely limited in the project area, unlike other parts of the Panhandle National Forest. Thus, Brebner is not in an IDFG elk priority habitat restoration area. Under the proposed action, elk security habitat will be lost within the elk management unit. Elk, deer, and moose forage availability will increase with newly created openings. The improved stand resilience and diversity will support a large suite of wildlife species however interior forest species may lose security habitat along with elk. Closing roads or reducing harvest units are two alternatives that would maintain elk security habitat.

If there are no motorized routes that can be closed to make up for elk security in this management unit, we encourage the USFS to use front end obliteration instead of gates on currently closed roads to create more effective road closures. People illegally remove and bypass gates, thus risking reduced security for all wildlife and increased sedimentation from unsanctioned motorized use. Front end obliteration will ideally reduce the illegal use of closed roads, enforcement burden, and provide the desired wildlife security. Hydrologic stabilization of stored roads should be monitored and adapted to meet erosion control standards and protect water quality throughout the life of the road.

Thank you for the opportunity to comment.

Sincerely,



Charles (Chip) E. Corsi  
Regional Supervisor

CEC:KJS:LW:njk

C: Gary Vecello, IDFG Idaho Falls  
Laura Wolf, IDFG CdA  
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