

Matthew Davis, District Ranger

February 28, 2018

St. Joe Ranger District

222 South 7<sup>th</sup> St, Suite 1

St. Maries, ID 83861

Dear Mr. Davis,

The following comments concern the Brebner Flat logging project described in the scoping notice dated February 1, 2018. Approximately 1,948 acres are proposed for logging, with approximately 2.5 miles of new system roads and approximately 4 miles of temporary new roads. The decision has already been made that an Environmental Assessment (EA) will be produced instead of an EIS.

NEPA Aquatic Issues:

NEPA requires an EIS when there may be cumulatively significant impacts, 40 CFR 1508.25(a) (2), or the proposed activities “threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment”, 40 CFR 1508.27(b) (10). There are no discussions in the scoping notice regarding any Clean Water Act (CWA) impaired water bodies that may be located within the project area or the cumulative effects analysis (CEA) area.

If there are any impaired water bodies within the project area and/or the CEA area that have an EPA Region 10 approved sediment and/or temperature TMDL, the NEPA document needs to provide high quality information with expert agency analysis regarding the status of one or more TMDLs as they apply to the proposed logging project.

Any impaired water bodies located within or downstream of the project area indicate the requirements of 40 CFR Part 130 at 130.12(c), and the NFMA requirements of 36 CFR 219.27(e) have not been met.

The TMDL discussions also need to include high quality information that would indicate whether there have been previous IPNF Forest Plan aquatics monitoring activities performed regarding sediment and/or temperature issues associated with previous timber sales in the project area.

The aquatics analysis also needs to provide high quality information with expert agency comments that would indicate whether the proposed logging and road construction would result in full compliance with all applicable Idaho Water Quality Standards (WQS).

There needs to be high quality information in the Aquatics section that will describe the number of acres in the project area that are in a rain-on-snow (ROS) zone. If there were one or more ROS events in the project area during the past 10 years, were any water bodies negatively affected due to increased sediment loads, or significant coarse or fine bedload movement?

There is an additional aquatics issue that applies to the proposed project. The issue concerns phosphorus entering the St Joe River from forest lands where it is then eventually transported

downstream to Coeur d'Alene Lake. On page 9 of the scoping notice it is indicated 17 openings greater than 40 acres in size would be created. The aquatics analysis needs to provide high quality information that describe the methods that would be used to prevent phosphorus from leaving logging units and then entering one or more waterbodies that flow into the St. Joe River.

Additionally, page one of the scoping notice discusses the section of the St. Joe River that has been designated as part of the Wild and Scenic River System. There needs to be high quality information that indicates whether any proposed logging units would be located near to any portion of the Wild and Scenic River Corridor.

Wildlife issues:

On page 8 of the scoping notice wildlife issues relating to elk security are discussed. The proposed logging would result in the loss of approximately 290 acres of elk security. On page 8 there is also a discussion of a site-specific Forest Plan Amendment that would last for approximately 10-15 years. The wildlife analysis needs to list the existing level of elk security in the elk management units in the project area, and in the CEA area. Would any new road construction be located within or adjacent to the elk management units?

Sincerely,

Mike Mihelich, Forest Watch Coordinator

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