

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

March 2, 2018

Subject: Brebner Flat Project

Thank you for providing the open house forum and giving us the opportunity to provide comments on the proposed logging plan for the Brebner Flat and Siwash Drainage.

First and foremost, let me say I am an advocate and supporter of logging and recognize its importance in our local economy, its contribution to forest management and ability to assist in managing healthy forest for wildlife. My father and several family members were/are loggers, drove logging truck and worked in local mills and I still have friends working in the industry so I am quite familiar with the current activities.

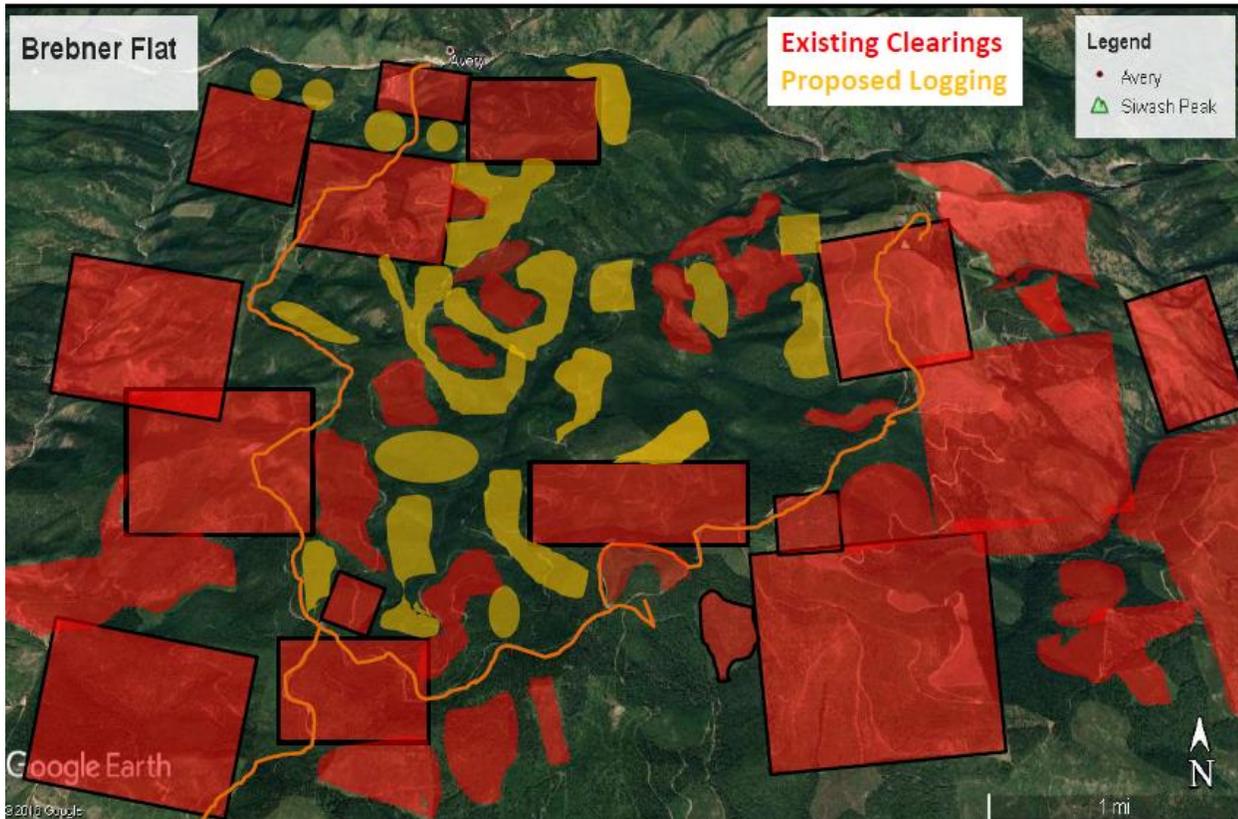
However, as many residents of North Idaho, I am also a avid outdoorsman and hunter and recognize the responsibility the Forest Service has in managing both commercial and recreational activities as well as working with Fish and Game in managing wildlife.

Our family has been hunting and camping in the Kelly Creek/Siwash Peak area for over 50 years. In fact, we have been in that area for several weeks "every" year for over 50 years. We are probably more familiar with that drainage than anyone in the region and have seen all of the changes that have taken place over this time and how these changes have altered elk behavior. We were very fortunate to have had the ability to hike through this area using the Cougar Creek, Horsecamp and Siwash Peak Trails as landmarks. It once was a beautiful area with a thriving elk population. These trails have all been destroyed by clear cut logging as have all the major game trails which were landmarks unto themselves. Sadly, these pathways are gone because of logging and more importantly because of this activity the elk behavior has changed so much. Because so much of the forest has been removed, the elk are forced to take cover in much smaller areas which leads me to the primary purpose for writing.

If the logging you propose was in an area where recent logging had not been so drastic it would be acceptable, however it comes on the back end of very significant clearcutting of private and Forest Service land in the area and in fact, what you are proposing, is basically logging the only areas that haven't already been taken.

The map below shows the logging in recent years in **Red** and your proposed areas for harvesting in **Yellow**. Excluding the drainages, the proposed logging is the majority of what timbered areas remain, especially in the Siwash Creek drainage.

## Brebner Flat Logging Proposal



The area in this map is greater than 20 square miles. The majority of the logging in red was in the form of clearcuts which completely eliminated the forested area. These clearcuts are in various stages of re-growth but none are suitable for sustaining elk habitat and many so brushy you can't walk through. The elk have been forced to take refuge in the forested areas that border these clearcuts. To now come in and log 1,948 acres of these borders and add 17 more clearcuts will all but eliminate the timber areas available in the area. Your proposal suggests leaving buffer areas for elk habitat, but what you are doing is taking away the only buffer areas that currently exist. Any supposed buffers remaining will be either stream areas or extremely narrow patches, certainly not sufficient to provide cover.

The elk management program in Unit 7 has not been successful in restoring the herds to acceptable levels. The destruction of much of the forest in that area combined with intense predatory

pressure has kept the herds from growing. In fact, unlike other units in the region, it still isn't open to cows and remains bulls only.

Because so many of the forested areas are already gone, elk and moose have become easy targets for wolves as shown in this picture I took of a recent wolf kill on a cow elk.

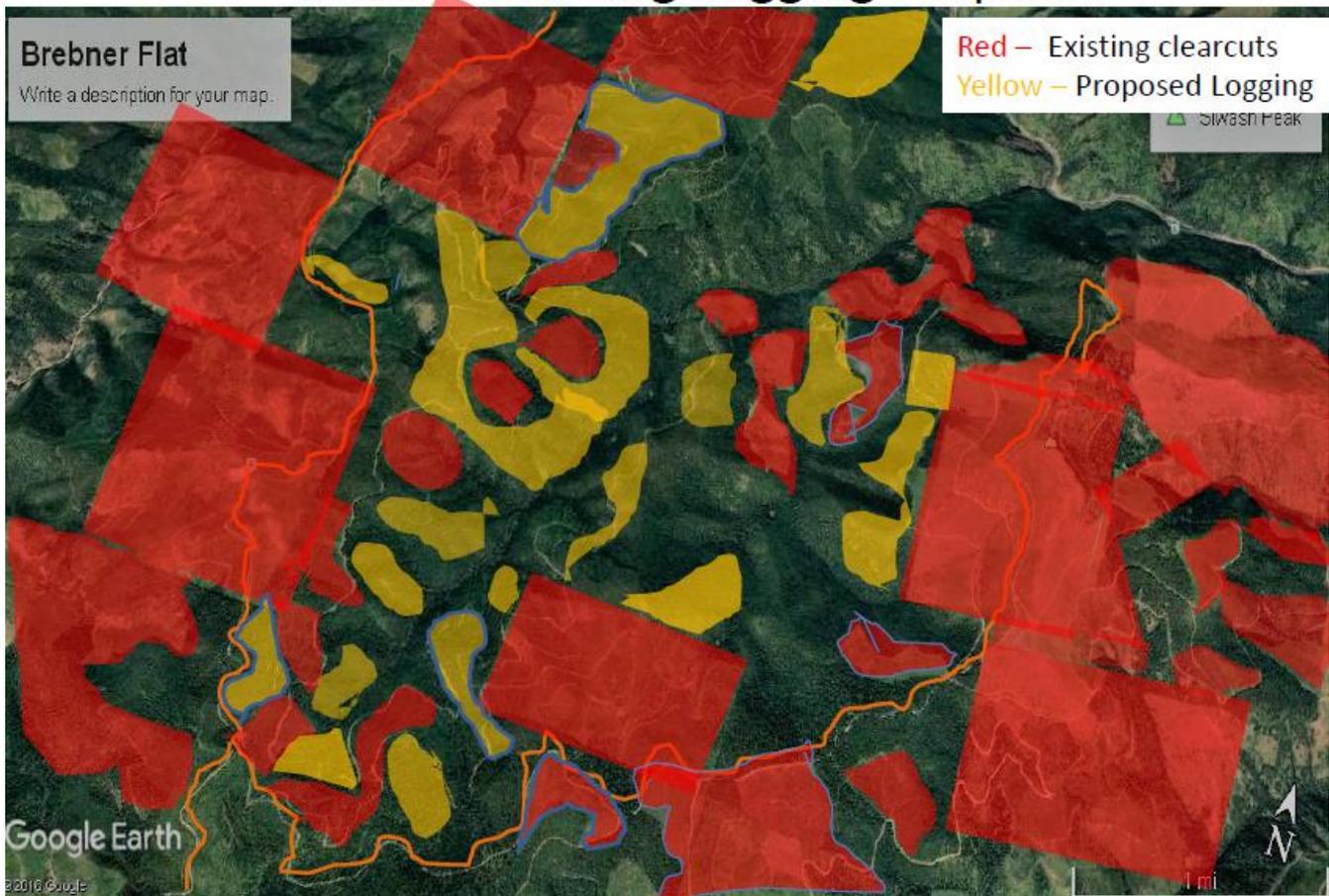


This is just one example of many. We have really noticed a reduction in moose in the area in recent years and every year we see evidence of new kills. In addition, when a mountain lion was caught in a wolf trap the trapper called Fish and Game to ask how to handle it, they advised him to put the cat down because the pressure from cats is as bad as wolves in that area.



The map below focuses mainly on the Siwash Creek drainage.

## Siwash Draining Logging Proposal



As stated, the majority of the map area in red was clearcut. Now, workers have gone in some of the more mature areas and thinned the new growth by cutting down undesirable species and leaving them lying on the ground. This has made these sections even further useless to elk as they are nearly impossible to walk through. In the snow you can see the elk avoid these areas and walk around them inside the forested borders. Much of the areas you propose to log are the borders the elk need and where they currently reside. Eliminating the borders turning them into open spaces will make them more susceptible to predators or drive them out of the area completely.

The current Forest Plan/Elk Management Project in place is designed to help provide security to elk in the area in order to allow herds to rebuild to acceptable levels whereby they are sustainable. It is intended to be in place until we have a healthy elk population, which has not yet occurred.

- Elk herds have not returned to acceptable levels.
- The cow calf ratios are lower than needed.
- Predatory pressures have not decreased.

- Currently logged areas are not mature enough nor suitable to provide adequate cover and habitat for elk.
- Harvest numbers for 2017 were drastically below 2016 numbers.
- Specifically to Brebner Flat/Siwash Drainage, **less than 5** elk were known to be harvested in 2017 for over 200 hundred hunter days.
- These are all supported by the fact that hunting regulations have not been relaxed because herds are not healthy enough to do so.

So, on the back of one of the worst harvest seasons historically in this area, why would you possibly take measures to reduce feed, eliminate security and put additional pressure on the elk? Why would the Forest Service suggest modifying the Forest Plan to further log 2,000 acres, destroy 300 additional acres of elk habitat and add 17 more clearcuts when the area is already insufficient to restore the herds. And on top of that, intentionally change the regulations to allow you to accomplish such a detrimental plan. Not only does it not make any sense, it appears completely irresponsible and counter to your objectives. I recognize you are not responsible for the poor practices on private land, but compounding the problem by your own actions is not a proper solution. Your plan will cause further harm to an already struggling elk population. We have already seen the almost elimination of mule deer in that area due to the clearcuts that currently exist. Siwash peak had a very healthy mule deer population before it was logged. Now it is a “very” rare sight to see a mule buck there.

Per your proposal, you have three options available to you regarding the Forest Plan; Modify the project, Reject the project or Modify the Forest Plan to allow the project to move forward. Modifying the Forest Plan to put additional pressure on a depleted and struggling elk population is not the proper solution. The proposal needs to be severely modified or rejected until the currently logged areas can mature enough to support the elk in the area. Once the elk have somewhere else to take cover, then maybe a proper logging plan can be implemented without causing further harm. But eliminating the majority of the cover they currently have is not the appropriate direction. At a minimum the size of the clearings can be reduced and leaving islands or peninsulas for the elk to take cover seems like a minor concession. Also, small areas like 31 and 32 could be left in place. These are surrounded by old logging area where alder brush makes it almost impassable. These are the only treed areas left in that section. They are so small for economic value but very important for elk security. Even area 30 is adjacent to private land that was clearcut and is now almost impossible to pass through. Leaving corridors for the elk to travel seems like a much more responsible approach.

Further, to try to categorize the program as improving forest health and reducing hazardous fuels is not a justifiable rationale for this proposal. Looking at the map, the majority of similar fuels in that area have already been taken. The majority of the same species has already been harvested. The total area per your proposal is 11,779 acres, so to suggest that logging those 1,948 acres or only 16% of the total area is necessary to make that area healthy is misleading. The vast majority of the area has

already been harvested. Sure there may be some disease and some undesirable species, but having 16% of another species is not going to significantly impact the total area. We recall when there were a lot of white pine forests and then the blister rust came and destroyed the trees. There were big camps of workers whose job it was to fight the blister rust, but nothing really worked. Now USFS has determined that they think they have developed a more resilient white pine and that it is the tree of choice and by doing so is trying to justify removing other species to create a healthy forest. No one wants to see our forests destroyed by disease or insects, and I am certainly not qualified to debate the science you have used but new disease comes along every generation and history doesn't support your rational.

I have spoken to Fish and Game and they agree that creating several new large clearcuts in this area will be detrimental to the wildlife. Scaling back the project and/or leaving islands and larger corridors for the elk seems not only logical but responsible. Harvesting 1,948 acres is not a huge operation and its economic impact is not critical. Harvesting only 16% of the area is not critical to the health of the entire area. Most of the fuels for fire suppression have already been removed so there isn't a critical fire danger being resolved by this program. However, taking a significant portion of the remaining elk habitat is critical for their ability to even remain at their current herd levels, let alone strengthen. The responsibility of the USFS in managing the commercial, recreational and wildlife management impacts on the forest seems to be significantly imbalanced by this proposal.

I appreciate the opportunity to provide input and express concerns on the proposed activity. I hope you will consider my comments and am more than willing to provide additional input or discuss further if desired.

Regards,



Mike Callahan

