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Project: Bog Creek Road Project

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I have previously submitted comments as requested on the Bog Creek Road Repair and Maintenance EIS.

The Bog Creek Road Project Draft Record of Decision restricts me to 6 trips on the upper 5 miles of the 636 Road but allows me no trips on the upper end of the 2464 Upper Road from the end of the 636 Road to Search Creek along which I have two salting sites and have been able to keep open to vehicle traffic by removing windfall and brush over the years. I also try to keep the lower end of the 2464 Lower Road open between the junction with the 1009 Road and Marsh Creek to prevent windfall barriers that may provide a trap for cattle trying to escape from the increased presence of wolves in the drainage. (Last year, I believe I lost 1 cow and 1 calf to wolves, and my gates holding the cattle on the allotment were torn apart as if the cattle had been stampeded through them.) Although 6 trips on both of these roads and road portions may be enough normally, the increased presence of wolves in the area may require a more "as needed" use to protect the cattle from the wolves.

In the final environmental impact statement on the Bog Creek Road on page 90, it states that motorized access to grazing allotments exist from April to September. I would gladly trade this erroneous statement for access from July 1 through October on an as needed use on the 636 Road and those sections of the 2464 Upper and Lower Roads previously mentioned during this time, as access outside

of these timeframes simply does not exist due to snow pack and windfall and would be totally unnecessary.

Furthermore, the impact that roads and human activity have on grizzly bears is largely overstated in the final environmental impact statement. Early studies contained a high degree of anti-road bias originating in the 1970s against roads and logging traffic. The summer of 2018 was not a real good huckleberry year, and there were at least 6 sightings of grizzly bears in close proximity to roads in the Kootenai Valley. The old Kootenai Valley railroad grade has numerous old apple orchards and apple trees along it, as well as chokecherry trees, sarvis berries, and other fruits planted on early homestead sites. This railroad grade runs parallel to and is crossed by numerous county roads with average daily traffic exceeding 50. Most of the sightings were in close proximity to this abandoned railroad grade. The family of Ben Nystrom had a sow and 2 cubs in their canola field while they were harvesting, and the bears didn't leave the field until the last center strip was cut. One evening last summer, I saw one grizzly bear headed downhill on the paved portion of the Smith Creek Road at the 2-mile marker.

A real disturbance to a grizzly bear would be luring them into a culvert trap in Trapper Pass, as the Fish and Wildlife Service did to collar, count and study them. A more drastic disturbance would be to bait them into a leg snare, as was done close to my salting spot near the end of the 636 Road one year. All the ground and roots and trees within reach of the bear were torn up by the bear in its struggle. Those are real disturbances. What was the effect on the bear? Apparently, it went back to doing what it was doing before it was trapped, but it was probably leerier of large culverts and those particular sites. Another real disturbance would be bear hunter misidentification, but bear hunting is still permitted in Bear Management Units. Wildfires would be another disturbance to grizzly bears.

An imaginary disturbance is from that of a road that has little (ADT less than 1) or no use but has the potential for use and a corresponding potential disturbance, if a bear were to hear a vehicle within 500 meters of it. In all the bear studies, the potential for a disturbance is assumed to have more impact on a bear than a real disturbance. Current forest planning in the BMUs is based on the probable impact of *potential* disturbances rather than *actual* disturbances. In the late 1990s, the

US FWS forced the USFS to obliterate roads in Grass Creek that had the culverts squashed and healed up with 30 years of thick alder brush (so thick they were extremely difficult to walk along) before they would quit deducting them from the core area. This demonstrates an anti-road bias in the minds of the author doing the early studies.

On page 87 of the Final Environmental Impact Statement for the Bog Creek Road Project, it states:

"Past human activities (grazing, timber harvest, mining, and road building) in the south Selkirks largely displaced grizzly bears from the area."

There is no mention of displacement due to the Sundance Fire, the Trapper Peak Fire, and the Kaniksu Mountain Fire, all of which occurred in the south Selkirks in 1967.

I was part of the fire control crew on the Kaniksu Mountain Fire and the Trapper Peak Fire in 1967, and I watched the mushroom cloud from the Sundance Fire as it exploded several miles further south.

- The Sundance Fire traveled on a 6-mile wide front for 16 miles, from Sundance Mountain across the Upper Pack River drainage to the ridge tops west of Bonners Ferry—*in just 9 hours*—scorching approximately 56,000 acres.
- The Trapper Peak Fire burned 16,600 acres over a 6-week period in the Cow Creek and Grass Creek drainages with 2,000 men and large equipment fighting it.
- The Kaniksu Mountain Fire burned about 800+/- acres with 500 men fighting it.

I find it hard to believe that no bears were killed or displaced, or habitats destroyed, by these fires. Apparently, the authors of previous studies do not want to acknowledge the impact that these fires had on grizzly bear populations and their displacement due to a bias against human activities such as grazing, timber management, mining, and roadbuilding.

All studies seem to be directed at roads and human activity instead of toward the food sources that the bears thrive on. Those of us that raise animals for a living must concentrate on animal health and their body condition. All animal

populations, domestic or wild, depend on the quality and quantity of their food supply. They must be in good body condition to survive winter, mate, and raise healthy offspring.

Bears in the Selkirks get most of their winter fat reserves from the mountain huckleberry. Huckleberries can be found all over the Selkirks above the 3500ft elevation. Usually the most persistent and productive huckleberry patches will be found along the semi-open ridge tops and the south easterly and south westerly slopes of old fire burns and logging clearings between the 4500ft and 6500ft elevation where timber growth is slow to return. The plants must be protected from late frosts by the snow pack, and they must receive the gentle morning sun. Fifteen to twenty years after the timber is removed by logging or fire, and under the right conditions, the huckleberries will become productive again in these areas and persist for years until timber regrowth or another fire slows down their production. This is shown on the Procter and Kasworm maps on pages 75-77.

Most of the roads built for logging are at lower elevations and along northerly slopes in the Blue Grass BMU where the timber stands were older and denser. When these areas are opened up by logging, it does stimulate huckleberry production for several years, but rapid tree growth overshadows the plants and reduces their production faster than the plants at higher elevations.

After the fires in 1967 burned off the ridge tops and displaced the grizzly bears, the return of their favorite food supply to these areas has contributed more to their increased population in the south Selkirks than managed motorized access.

Another factor to consider is weather. In the Pacific Northwest, plant and animal populations are under the influence of a 50 to 60-year climate cycle called the Pacific Decadal Oscillation. This influence on plant growth also influences the insect populations that feed on them and the animals that depend on the plants. I have kept track of the annual precipitation on a calendar year basis at my house in Copeland, Idaho at the 2000+/- foot elevation for over 30 years. During the warmer dry cycle from 1977 to about 2002+/-, the annual precipitation from 1985 to 1995 was near 18", with the driest year being 11.5". The wettest year I ever recorded was 2012 with 35.75". The average over the last 5 years (2014-2018) has been near 28". This affects plant and animal populations and the balance between prey and predators.

During the cool wet period from 1947 to 1977, we had deep powdered snow and mountain caribou in the upper reaches of Boundary Creek near the Canadian border. Loggers logging in Bog Creek during the late 1960s reported caribou hanging around their camp eating the lichens off of the trees after the trees were cut and lying on the ground. They also reported seeing the caribou licking the grease off of their machines. The licking of grease is a sign of a "pica appetite" which indicates a mineral deficiency, most notably salt. The lack of minerals in their diet would be largely responsible for their high infant mortality.

Another factor that should be considered is snow. Snow fall and snow pack conditions affect the balance between predator and prey. When snow falls, it begins to compress. The longer time between each snow fall, the more compressed the snow will be. If the snow contains high moisture, the more compressed it will be. By early spring (February-April), the compressed, wet snow turns to granulated frozen ice crystals that can be walked on without sinking in. At that point, the snowpack turns into a super highway for predators, such as wolves, to travel on. They do not need roads to travel on, especially when the snow is compressed so much that it can easily support their weight without the risk of their legs sinking down into it. The reintroduction of wolves into the Selkirks at the same time that 60 mountain caribou were reintroduced into the same area during the warm, dry cycle of the Pacific Decadal Oscillation allowed predators, such as wolves, to easily access the caribou across a firm, frozen snowpack, nearly eliminating them from the north and south Selkirks.

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We have become an increasingly litigant society interested in arriving at a predetermined outcome through half truths and selective science. We have become very good at this. The biological field contains so much gray area and room to maneuver that using selective science to arrive at a predetermined conclusion is not easily recognized. When wealthy environmental activist groups, such as the Yellowstone to Yukon Coalition, choose to fund a college student's graduate study to earn a master's degree in biology, it is hard to imagine that it will not at least have a predetermined focus or slant dictated by the funding organization's agenda. If wealthy parents can buy their child's way into prestigious schools, wealthy organizations can surely buy a study.

A healthy forest with healthy streams, fish, and animal populations will be better understood and maintained by including collaboration with the people living in and amongst the forests and animals. To fully understand how climate, weather, stream flow, and plant and animal populations are intertwined, you must become contaminated with knowledge. When that happens, you will be standing in the way of an urbanite mob with no knowledge of the subject rushing toward a pre-determined agenda.

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