Coeur d'Alene Ranger District

2502 East Sherman Avenue

Coeur d’Alene, ID 83814

Attn: Dan Scaife

June 16, 2021

**Subject: Honey Badger Environmental Assessment**

Dear Mr. Scaife:

The vision of the Panhandle Forest Collaborative (PFC) is to assist agencies by bring balanced approaches to timber, wild ecosystems and recreation and to contribute to the sustainable social, environmental and economic viability of our region. The PFC focuses on issues on the Idaho Panhandle National Forests (IPNF), primarily within the Sandpoint and Priest Lake Ranger Districts and a portion of the Coeur d’Alene Ranger District - including the Honey Badger project area. Our goals include reducing litigation, promoting sustainable operations, enhancing travel and recreation opportunities, maintaining infrastructure for timber, ranching and recreation, and conserving native ecosystems. The PFC works to build consensus recommendations for projects and forest plans that address these goals.

We are writing to provide comments on the Honey Badger Environmental Assessment (EA) on behalf of the PFC. The PFC has been involved in the planning process for this project since its inception. We agree that there is a need to improve and maintain recreational trails, improve forest conditions, reduce the threat of fire to communities and infrastructure, improve habitat for big game and flammulated owls, improve water quality and aquatic habitat, and improve the road system.

The Honey Badger Project is a large, landscape-scale project that includes approximately 12,250 acres of commercial treatments and approximately 5,500 acres of prescribed fire outside the harvest units. The proposed silvicultural treatments, pre-commercial thinning, and prescribed fire will go along way toward achieving desired conditions for the project area as stated in the Forest Plan. The PFC appreciates the fact that none of the proposed activities would modify dry old growth forest stands to the extend that they no longer meet old growth definitions. We support the replacement of a culvert under Road 437 to remove a barrier to fish passage.

The Honey Badger project would produce an estimated 200 million board feet of timber volume, construct 25 miles of new system roads, heavily reconstruct 15 miles of old roads and build 10 miles of temporary roads for a total of 60 miles. We believe that the size and scale of the Honey Badger Project warrants preparation of an environmental impact statement (EIS) in lieu of an EA. An EIS is required when significant environmental effects are expected. We note that there is a draft Finding of No Significant Impact, but given the brief discussion of impacts in the EA, and the lack of specifics regarding leave trees in each unit, we cannot tell if this project will have significant impacts. The final environmental analysis should provide more detail regarding the effects of the project to water quality, fish and wildlife, and other affected resources. Effects determinations should be supported with quantitative data and the best available scientific information.

PFC understands the challenge of describing the aggregate retention and clumping that will take place within individual units - many of which are over 40 acres in size. The discussion of this in the project file (*Consideration of References Recommended During Honey Badger Project Public Scoping)* states this:

At this stage of project development, aggregate retention areas have not yet been laid out and dispersed retention densities have not yet been prescribed on a unit-specific basis; however, variable-retention harvesting principles would be incorporated into all units and throughout the landscape during unit layout and prescriptions. We estimate that 5-20% of the acreage each unit, and of the project area as a whole, would be excluded from harvest during unit layout. Some of these areas, such as obvious riparian areas or sensitive soils, have already been excluded using digital imagery and LIDAR, but most patches are not identified until the unit layout phase of project implementation. Field crews can more effectively determine the best locations for retention patches based on tree characteristics, including tree age, as recommended by Franklin and Johnson (2009), but also tree species, size, fire-resistance, and health.

PFC has been supportive of past aggregate retention areas in the Blue Alder and Bottom Canyon project units. We believe that more detail prior to implementation would be valuable and not expose the Forest Service to challenges that an adequate impact analysis was not done. Condition-based management, which is a management approach that the Forest Service has increasingly used to authorize timber harvests to increase flexibility, discretion, and efficiency is being challenged on other Forests because it doesn't reveal the impacts on wildlife, hydrology, soils, etc during the public process. We understand that many of these stands have root disease and a lack of resilient species such as larch, ponderosa pine and white pine. But a complete stand conversion may need to take place in two or three phases over a period of decades to minimize adverse impacts on the other forest resources.

We note that Veg 22 shows retention examples but doesn't describe clumping or aggregate retention. Leaving a prescribed number of clumps and a higher basal area per acre could be part of the aggregate retention. For example, the impacts from a large unit will be very different if 5% of the trees are retained vs. 20%. The Honey Badger project files indicate there will be 59 units that are over 40 acres, including one over 1200 acres. A unit this size with only 5% tree retention could have significant impacts that should be analyzed before a Decision is made. We believe that more detail and analysis of the units over 40 acres is important and warranted.

To achieve vegetative desired conditions, the Forest Service also proposes to construct 30 miles of new system roads. The magnitude of new road construction has been a topic of discussion within the PFC. Due to concerns regarding elk habitat security and water quality, the new system roads will be constructed in phases over the life of the project. These roads would be accessible for administrative motorized use only and would be closed to public motorized use with gates or barriers. The PFC would like to emphasize the importance of adequate barriers to protect wildlife security. We recommend that the Forest Service fully obliterate and recontour the first 300 feet of stored roads in order to ensure the efficacy of road storage and protection of wildlife habitat.

In summary, the PFC supports the overall objectives of the project and nearly all of the proposed activities but would suggest more detail on unit layout and impacts. We appreciate the interactions with trail users of all types in this popular recreation area, as well as the attention to concerns about the viewshed from the Hayden Lake area. The PFC encourages the Forest Service to take steps to ensure proper and effective road storage to protect wildlife. The PFC appreciates the opportunity to be involved in the planning process for the Honey Badger Project, and we look forward to reviewing the final EA and decision notice.

Sincerely,

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| Liz Johnson-Gebhardt  Co-Chair | Mike Petersen  Co-Chair |