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Mr. Dan Scaife
Coeur d'Alene River Ranger District
2502 East Sherman Avenue
Coeur d'Alene, ID 83814

April 22, 2020

Dear Mr. Scaife:

I am writing on behalf of the Idaho Conservation League to comment on the proposed Honey Badger Project. Since 1973, the Idaho Conservation League has been Idaho's voice for clean water, clean air and wilderness—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 30,000 supporters, many of whom have a deep personal interest in protecting human health and the environment.

We thank the Forest Service for the detailed overview of the proposed action as described in the scoping notice and illustrated on project maps. However, we lament the lack of information regarding the location of proposed road decommissioning, the current conditions of fish and wildlife habitat, and an identification of preliminary resource issues to be reviewed in the environmental analysis. Given the scale and intensity of proposed activities, we highly encourage the Forest Service to prepare an environmental impact statement. As note in our comments, it is difficult to imagine that this project will not result in significant environmental effects.

We are also concerned about the proposal to construct 35 miles of new roads and 21 miles of temporary roads. To the degree that the Forest Service can assure that 50 to 80 miles of unneeded roads will be decommissioned, this concern could be ameliorated. However, without more detailed information regarding the locations of roads proposed for decommissioning and the expected environmental benefits, it is difficult to assess the overall balance of proposed road work.

While regeneration prescriptions are considered essential to achieving desired forest conditions, extensive use of regeneration harvest can result in significant effects to wildlife, water quality, and fish. We recommend that the Forest Service consider applying concepts of "ecological forestry" proposed by Norm Johnson and Jerry Franklin. Their recommendations will mitigate some of the environmental effects associated with otherwise intensive regeneration prescriptions. If the Forest Service applies these concepts to specific units, we ask that you identify these units in the environmental analysis and the amount of retention that will occur.

Our comments and recommendations are detailed in the following document. Please keep ICL on the mailing list for this project. We look forward to working with the Coeur d'Alene River Ranger District on this and future projects.

Sincerely,

Brad Smith
North Idaho Director

Honey Badger Project Comments

NEPA analysis

The Honey Badger Project is the next in a series of recent projects on the IPNF where the amount of timber harvest is orders of magnitude larger than past timber sales. Until recently, timber sales on the IPNF rarely exceeded 4,000 acres. In comparison, the Buckskin Saddle, Westside Restoration, and Honey Badger Projects propose to harvest 13,400, 9,500, and 12,000 acres of timber respectively.

As directed by the Regional Forester, the IPNF will prepare environmental assessments ("EAs") for these projects in lieu of more detailed environmental impact statements ("EISs"). As the agency is aware, EAs are allowed when federal agencies expect no significant environmental effects to occur as defined in regulations implementing the National Environmental Policy Act ("NEPA"). Where significant effects are expected, a more detailed EIS is required. The Regional Forester's one-size-fits-all approach ignores this distinction, and the possibility that large timber sales will likely result in significant environmental effects.

In fact, the IPNF has prepared EISs for timber sales that are much smaller than the Buckskin Saddle, Westside Restoration, and Honey Badger Projects. For example, in 2014, the Coeur d'Alene River Ranger District approved a Record of Decision for the Beaver Creek Project. The IPNF prepared an EIS for this project because the Forest concluded that the 1,975-acre Beaver Creek timber sale would result in significant environmental effects.

Given the acreage of timber to be harvested, the mileage of roads to be constructed, and the associated effects to water quality, habitat, fish and wildlife, and other natural resources, we strongly encourage the Forest Service to document project effects in an EIS. Given past analyses associated with much smaller timber sales, it is difficult to imagine that significant environmental effects will not result from projects that are now approximately four to six times larger in terms of the number of acres of timber proposed to be harvested.

Silvicultural prescriptions

As part of the Honey Badger Project, the Forest Service proposes to approve a vast number of acres for regeneration harvest. The proposed action would create 91 openings, 62 of which would be larger than 40 acres in size. Several openings would be larger than 300 acres, and the largest would be nearly two square miles! While regeneration harvest can be an important tool to achieve desired forest conditions, regeneration harvest can also negatively affect wildlife. Johnson and Franklin (2009) developed a set of recommendations to ameliorate these concerns, which we encourage the Forest Service to incorporate into this project. They advocate for the retention of pockets or "aggregates" within target treatment stands. In the treated areas between aggregates, Johnson and Franklin also recommend dispersed retention of individual leave trees, coarse woody debris, snags, and small clusters of trees. While the primary objective of their recommendations is to ensure that important structural components of

wildlife habitat are retained following timber harvest, their recommendations may also satisfy visual quality objectives through the creation of more natural looking openings.

Based on pilot projects implemented on the west slope of the Cascades, Johnson and Franklin recommend that foresters retain approximately 30% of the original stand in aggregates, varying in size from 0.5 to 5 acres. Larger aggregates are encouraged where unit size and yarding methods permit. Aggregates should be centered on mature or old growth trees, concentrations of coarse woody debris, snags, seeps, rock outcroppings, or other unique structural features. To the extent practical, aggregates should include an overall representation of the tree species that were present in the original stand.

Retained aggregates should be well distributed throughout the treatment unit. Johnson and Franklin suggest that it is okay to count riparian habitat conservation areas (RHCAs) toward as much as 30% of the retention target when RHCAs extend into harvest units. However, credit for riparian buffers should be minimized because RHCAs are spatially concentrated and tend not to be well distributed in treatment areas. Ecological forestry objectives are not met when large areas are created that lack in retention.

In the treated areas between aggregates, additional retention should also occur as individual leave trees, coarse woody debris, snags, and small clusters of trees. Large or mature trees are ideal candidates. Retention of individual trees is intended to aid in the recruitment of snags, nesting habitat and coarse woody debris.

Following harvest, treated areas should be broadcast burned. Aggregates should remain unburned. The mortality of some individual leave trees or clusters of trees is acceptable because this will serve to create snags for species that are associated with or benefit from these structural features.

Finally, the edges of treatment units should be irregularly thinned. Sharp unit edges result in a phenomenon known as the "edge effect", which is not only visually unappealing, but sharp edges are also not ideal for wildlife.

The scoping notice seems to indicate that some of these concepts may be integrated into the project. However, this is unclear. To the degree that the Forest Service proposes to retain patches of trees, individual leave trees, and coarse woody debris, the environmental analysis should indicate which units these recommendations will be applied to and the amount of retention that is likely to occur.

Live tree retention

While the retention of entire stands of old growth trees is important for ecological reasons, so is the retention of individual mature trees within stands or portions of stands that are targeted for silvicultural treatments. The Forest Service understandably intends to focus on the retention of any long-lived early seral species that occur in treatment areas. However, retention of large, mature, shade tolerant species may also be desirable from a wildlife standpoint. Large, mature trees can provide habitat for nesting and aid in the recruitment of snags, course woody debris, and other beneficial structural components.

This objective is typically accomplished by setting a limit on the diameter of trees that may be cut and harvested. However, age limits are also gaining traction in the scientific literature (e.g. Johnson and Franklin 2009). While no single diameter or age can define these biological legacies, diameter and age

limits can help facilitate the conservation of the most desirable leave trees in forest stands that are slated for treatment.

In the forests of north Idaho, diameter and age limits are probably most appropriately derived from Green et al. (2011), who use a minimum age of 150 years in their definition of old growth trees (Lodgepole pine is a notable exception, with a minimum age of 120 years.). Some foresters reject age limits as a practical matter. However, Johnson and Franklin (2009) describe how to make age limits work (see pages 26 and 27).

If the application of an age limit remains problematic, then we suggest using species-specific diameter limits for live tree retention. We suggest using the following diameter limits, which come from the old growth criteria for the North Idaho Zone described by Green et al. (2011):

- Retain all ponderosa pine, Douglas-fir, grand fir, western hemlock, white pine, and western larch that are 21 inches dbh or greater.
- Retain all western red cedar that are 25 inches dbh or greater.
- Retain all lodgepole pine that are 13 inches dbh or greater.
- Retain all subalpine fir, Engelmann spruce and mountain hemlock that are 17 inches dbh or greater.

Snags

Where dead trees or snags exist, they should be retained for wildlife benefit. In this instance, age thresholds and diameter limits should not be applied. While several sources (Thomas 1979, Raphael and White 1984, Zarnowitz and Manuwal 1985, Morrison and Raphael 1993) provide recommendations for the number of snags to retain in unburned forests, why not retain all snags unless they pose a safety risk? Dead trees tend to provide little or no economic value, but they are of great benefit to wildlife.

Coarse woody debris

The retention of on-site, coarse woody debris is important for a variety of reasons. There are a number of species that benefit from logs, trees, boles, and other large pieces of wood lying on the ground. Coarse wood debris also reduces erosion by trapping sediment and run-off and helps maintain soil nutrient capital. The microclimates created by coarse woody debris are often critical to the regeneration of desired trees and vegetation because the removal of overstory trees during logging operations increases solar radiation and reduces soil moisture. We recommend retention of the following amounts of coarse woody debris:

Biophysical Setting	**Tons/acre (TA) >3" in diameter**	**Log numbers and sizes to retain where they occur**		
		Number of pieces/acre (PA)	**Minimum diameter**	**Average length (feet)**

Warm/Dry (VRUs 1-3)	VRUs 1-2: 7-12 TA VRU 3: 10-20 TA	6-14 PA	10 in. with at least 2 pieces greater than 20 in.	20 ft. - with minimum 12 ft.
Warm/Moist (VRUs 4-6)	17-33 TA	20-30 PA	12 in. with at least 10 pieces greater than 20 in.	35 ft. - with minimum 12 ft.
Subalpine (VRUs 7-11)	VRUs 7-8: 12-25 TA	VRUs 7: 20-30 PA VRUs 8-11: 15-20 PA	VRU 7: 12 in. with at least 10 pieces greater than 20 in. VRU 8-11: 10 in.	VRU 7: 35 ft. with minimum 12 ft. VRUs 8-11: 30 ft. with minimum 12 ft.

Old growth

We appreciate the fact that no old growth will be harvested in the Honey Badger Project Area. We support the use of prescribed fire in dry old growth types to reduce fuels and shade-tolerant species in the understory.

Landscape burning

We support the proposed landscape burns. Prescribed fire is an important tool for achieving desired forest conditions. Fire not only reduces fuel loads, but it also helps promote desired species composition and structure and creates early seral habitat for species that depend on it. Prescribe fire also more closely mimics natural disturbance patterns than mechanical treatments, and prescribed fire may be applied without building additional roads. Roads can negatively affect water quality and fish and wildlife. We also understand that prescribed fires create smoke. However, continuing to suppress fires will cause additional fuels to accumulate. Inevitably, unplanned ignitions will occur in this project area. If the Forest Service doesn't act to reduce fuels now, then we can expect even larger, unplanned fires to occur, and consequently even more smoke to plague people near and far.

Riparian habitat conservation areas

It does not appear that any of the proposed treatments are located in riparian habitat conservation areas ("RHCAs") as defined by the Forest Plan. We generally oppose mechanical treatments in RHCAs unless the Forest Service can (1) justify the proposed treatments with supporting scientific information, and (2) achieved desired riparian management objectives as stated in the Forest Plan.

Transportation

The proposed 35 miles of new road construction and 21 miles of temporary road construction is concerning because of the potential adverse effects that new road construction will have on wildlife security and water quality. We encourage the agency to make use of established routes, either functioning or repairable before any newly constructed routes are added to the landscape.

ICL appreciates the fact that the Forest Service undertook a Travel Analysis Process (TAP) to determine the condition of the transportation system within the project area and basing the proposed actions on those results. We commend the Forest Service for proposing to decommission and obliterate an estimated 50 to 80 miles of roads that do not contribute to long-term management goals and eliminating barriers to aquatic organism passage. However, it appears that not all of the proposed road decommissioning is illustrated on the project maps. Assurances that 50 to 80 miles of roads will be in fact decommissioned would help alleviate concerns associated with new and temporary road construction. We also encourage the Forest Service to identify and address unauthorized routes and the potential for those areas to adversely impact water quality. Any identified unauthorized route that is found to significantly contribute to sediment loads and impact water quality should be obliterated from the landscape.

At the project's conclusion, the balance of new and reconstructed roads should be far less than routes proposed for decommissioning. ICL understands that all temporary roads will be removed at project's end. However, if newly constructed permanent routes equal or exceed the amount of road decommissioning, we predict this may be viewed by interested parties as more of a reorganization of road systems rather than proactive work to improve water quality and wildlife security.

We are also concerned about the proposal to construct temporary roads. Temporary roads must be closed within 10 years of completion of a project (16 U.S.C. 1608(a)), unless the Forest Service re-evaluates the road and determines it to be necessary for the minimum road system. The Scoping Notice fails to provide a potential timeline for addressing temporary road obliteration, and we recommend the Forest Service include this in the environmental analysis.

The Forest Service should fully discuss the effects of the construction of temporary roads, including disclosing the specific location of each road. During the project, and for at least additional 10 years after completion of the project, temporary roads will continue to have very real impacts on the forest. For example, temporary roads will continue to allow for harassment of wildlife, segmenting of habitat, littering, fires, invasive plant distribution, and negative impacts to aquatic and riparian habitat, as well as the fish that depend on that habitat. Some impacts are unclear, given the lack of information in the scoping notice regarding locations of proposed road activities. As noted above, the Forest Service must conduct site-specific analysis as part of its analysis. This includes explicitly delineating where temporary roads will be located.

The Forest Service must also consider the effects of its proposal to construct temporary roads when combined with the effects of its system roads and how, in the cumulative, these actions might detract from achieving the purpose and intent of subpart A of the Travel Management Rule. It must consider how construction of temporary roads will detract from the forest's efforts to achieve road density standards. Temporary roads are not included in road density calculations, but are certain to have real, lasting impacts on the resources that road density standards are designed to protect. These considerations are especially important if the Forest Service fails to provide assurances that the proposed temporary roads will in fact be closed within 10 years of completion of the relevant project.

The Forest Service states that temporary roads would be obliterated. It must provide a schedule or timeline for the obliteration of these roads. Without some assurances, it is possible the temporary roads could remain on the landscape well beyond the 10-year limit. The agency must consider these likely impacts, direct and cumulative, especially if it does not add the following monitoring assurances. Construction of temporary roads without adequate monitoring and enforcement to ensure the roads will in fact be temporary undermines the goals of subpart A to establish an economically and environmentally sustainable road network.

Water Quality

ICL appreciates the Forest Service proposing project actions that address water quality and sediment delivery issues through Transportation and Recreation undertakings. However, the scoping documents do not provide a sense of the current stream status throughout the project area. For instance, the documents fail to state whether any of the streams in the project area have 303(d) status with the Idaho Department of Environmental Quality. We recommend the Forest Service conduct a complete analysis of watershed health in the project area for the EA, and incorporate current and future measures to mitigate these impacts and restore stream health.

Recreation

The Idaho Conservation League recognizes the importance of easily accessed and well-maintained trail systems near urban areas, and we generally support the recreation improvements proposed for the Honey Badger project. We appreciate the Forest Service providing an overview of the proposed changes to the trail network, and we commend the Forest Service for acknowledging the current paucity of non-motorized trails in the Canfield Mountain area. ICL concurs with the proposal to create a non-motorized trail system in the western portion of the project area (Trails P1, P6, P7, P8, P9, and P10A). The Forest Service should also consider creating a non-motorized route starting at the Nettleton Gulch Trailhead that connects to the western terminus of proposed non-motorized trail P1 as none of the trails that start at Nettleton Gulch are non-motorized. Non-motorized users must first use motorized routes out of the Nettleton Gulch Trailhead to access non-motorized routes, which is undesirable and increases the potential for user conflicts.

The previously referenced Trails Map indicates numerous opportunities exist for single-track motorized recreation, though many of the trails are in poor condition. While we support creating and ensuring multiple-use trail systems, ICL is concerned about the potential for these numerous single-track trails to continue contributing sediment to streams if trail segments are not properly built or if users continue to create unauthorized "cherry stem" routes that emanate from an established official NFS trail. Further, motorcycles can disproportionately affect erosion and trail rutting when heavily knobbed tires are used on wet, muddy, or highly erodible soils. We recommend the Forest Service carefully analyze the proposed actions regarding single-track motorized trails, construct and maintain trails to established standards, and implement a monitoring program to determine the effectiveness of the amended travel plan and the level of user compliance.

According to the Preliminary Proposed Trails Map and its Legend, several single-track and <50" motorized trails are proposed to be "dropped" from the National Forest System. These include trail segments P22 and P23, P31, P19, P17, P18, and P20. However, the scoping documents do not provide a proposed plan for how these trials will be removed from the NF system. We recommend the Forest Service decommission and obliterate these routes if they are to be dropped to prevent unauthorized continued use and the creation of additional unauthorized routes. With the project area covering such a large landscape and the maps containing numerous symbols, we found it hard to distinguish between roads identified for "Decommission, Drop" and "Open Road" because the symbols are similar. We suggest the Forest Service provide additional maps in the EA that break apart the multiple Geographic Information System (GIS) layers to provide more easily interpreted data.

The Forest Service should also consider potential seasonal limitations to protect resources. Motorized vehicles and mountain bikes should not be allowed on trails when the soil is saturated. Saturated trail treads are more susceptible to resources damage and erosion. The sustainability and longevity of the trail network would be vastly improved through the use of appropriate seasons of use.

Fish and wildlife

The scoping notices fails to identify preliminary issues, including potential effects to fish and wildlife. We recommend the Forest Service consult with Idaho Fish and Game and the U.S. Fish and Wildlife Service regarding recommended treatments and Design Features to mitigate potential lasting impacts to wildlife and fisheries. The Forest Service should survey the project area for all sensitive, candidate, threatened, and endangered species, and apply appropriate mitigation measures as need to limit affects to these species or better yet, restore habitat for these species. For example, agency biologists should survey proposed harvest units for raptors prior to entry and apply appropriate buffers as well as adjust the timing of entry.

A rigorous effects analysis for fish and wildlife is also warranted given the scale and intensity of proposed project activities. The Forest Service should survey project area streams for native fish and to estimate sediment loads and habitat quality. Additionally, the Forest Service should calculate road densities for each HUC 12 watershed and compare road densities to what the best available science says about the relationship between road densities and sediment and aquatic habitat.

The Forest Service should also analyze elk habitat effectiveness as required by the Forest Plan. Reductions in open motorized routes (both roads and motorized trails) should be considered to meet elk habitat security objectives.

We also strongly encourage the Forest Service to analyze potential effects to grizzly bear. As described in the following table, there are a growing number of confirmed grizzly bear sightings within or near the Central and South Zones of the IPNF. We believe that these movements necessitate effects analysis for grizzly bear as part of this and all future projects on the forest.

Confirmed grizzly bear movements outside of recovery zones in north and north central Idaho.		
Year	**Location**	**Details**

2007	North Fork Ranger District, Nez Perce-Clearwater National Forests	A male grizzly bear was shot and killed in a case of mistaken identity in Kelly Creek. DNA testing revealed that this male was from the Selkirk Mountains.
2009	Rose Lake, ID	A male grizzly bear was shot and killed in a case of mistaken identity in Bentley Creek. DNA testing could not specifically identify the origin of this bear but a process of elimination suggested it was from the Cabinet Mountains.
2013	Coeur d'Alene River Ranger District, Idaho Panhandle National Forests	A female grizzly bear affectionately referred to as "Ethyl" made her way from the Hungry Horse area in Montana to Magee Creek. She later wandered back to the Glacier Region in 2014 after swinging through the Silver Valley and St. Regis areas. She may have hibernated in the St. Joe Drainage during the winter of 2013-2014.
2015	Coeur d'Alene River Ranger District, Idaho Panhandle National Forests	A male grizzly bear was shot by a black bear hunter north of the Silver Valley. This bear was originally relocated from the Whitefish Range in Montana to the Cabinet Mountains for population augmentation.
2018	Rathdrum, ID	A 2-year-old male was captured north of Rathdrum, ID. DNA results are not yet available to identify the origin of this bear.
2018	Sandpoint Ranger District (South of the Clark Fork River)	A 2-year-old male augmentation bear was released in the West Cabinet Mountains near Spar Lake in July 2018. The bear moved south from the release and crossed the Clark Fork River in August 2018 just downstream from Cabinet Gorge dam. The bear remained south of the Clark Fork River with few if any observations or reports from the public until early September when an Idaho resident reported a collared grizzly bear at a black bear bait site. A decision was made to attempt capture and relocate the bear back into Montana. The bear was captured and after receiving a new radio collar the bear was released in the South Fork of the Bull River. However, the bear returned to the same area south of the Clark Fork River eight days later.

2019	North Fork and Moose Creek Ranger Districts, Nez Perce-Clearwater National Forests	A male grizzly bear moved from the Cabinet Mountains through the Coeur d'Alene, St. Joe, North Fork Clearwater, and Lochsa River drainages to the Selway-Bitterroot Wilderness. The bear was originally captured in the North Fork of the Flathead River and released in the Cabinet Mountains for population augmentation.

Although beyond the scope of this decision, we also recommend that the IPNF expand the existing order governing the storage of wildlife attractants on the North Zone to the Central and South Zones. This would reduce the potential for conflicts between wildlife and forest users and limit human-cause mortality of grizzly bears. If for no other reason, requiring the storage of attractants would reduce the potential for the habituation and eventual conflict between people and any wildlife species on the forest.

Noxious Weeds

Vehicles and equipment serve as vectors for the spread of noxious weeds when proper inspection and cleaning are not practiced to limit their spread. Disturbed soil should be stabilized and seeded with native vegetation to prevent erosion and expansion of noxious weeds. All equipment should be inspected, cleaned, and washed prior to the operator entering public lands. Work crews trained in noxious weed recognition and removal should patrol the project area and mechanically remove any weeds or trash. The Forest Service should use this opportunity to restore native vegetation, and ICL recommends the use of all native species in the project area, especially areas that have direct associations with temporary roads and/or skid trails.

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