April 27, 2020

Honey Badger Project
Coeur d'Alene River Ranger District
2502 East Sherman Avenue
Coeur d'Alene, ID 83814.

Dear Honey Badger Project Analyst:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide scoping comments on the Honey Badger Project.

AFRC is a regional trade association whose purpose is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies and decisions regarding access to and management of public forest lands and protection of all forest lands. Many of our members have their operations in communities within and adjacent to the Idaho Panhandle National Forest and management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

Many of our comments on this project come from a very informative field trip with the Forest and District to the project on June 26, 2019. AFRC also submitted pre-scoping comments, which we appreciate your review and inclusion of our input into this scoping notice.

The project area encompasses about 52,600 acres just east of Hayden, Idaho, and activities are only being considered on about 42,000 acres of National Forest System Lands. The project is located almost entirely within Kootenai County with a small portion in Bonner County. Approximately 85% of the project area is within the Wildland Urban Interface.

AFRC supports the purpose for the project which is to improve ecological and social conditions to meet desired conditions described in the Idaho Panhandle National Forests Land Management Plan. Those include:

- Establish and maintain resilient forest stand structure and species composition.

- Reduce the potential for high-intensity wildfire while promoting desirable fire behavior characteristics and fuel conditions.
- Reduce sediment delivery to streams from the road and trail networks and to restore aquatic organism passage.
- Develop, restore and maintain a sustainable recreation trails network.

AFRC supports the manner in which the Forest is analyzing this project with all of the diverse interest in the immediate area including visibility from the town of Hayden and from Hayden Lake itself. The Canfield Mountain area has a lot of recreational motor and mountain biking use and hiking, and there is also a lot of recreational shooting that takes place in non-designated areas. On our field trip and pre-scoping letter we discussed the sensitivity of maintaining acceptable visual landscapes while still treating the forest for silvicultural and fuels reduction needs.

While AFRC supports the Need for the project and all of the pre-work meetings and trips made to the project area with various groups, we would like to make the following comments that we believe might strengthen or improve the project.

1. AFRC's members' ability to harvest and remove timber products from the timber sales generated off this project is paramount. We would like the Forest Service to recognize this importance by **adding economic viability & support to the local infrastructure to the purpose and need** of the Honey Badger project. Supporting local industry and providing useful raw materials to maintain a robust manufacturing sector should be a principal objective to any project proposed on Forest Service land, particularly those lands designated as general Forest. As the Forest Service pointed out on our field trip, the "restoration" treatments that are needed in the Honey Badger Project area cannot be implemented without a heathy forest products industry in place, both to complete the necessary work and to provide payments for the wood products generated to permit the service work to be completed. There is a lot of restoration work needed post-harvest on the Project and much of that work will get done from the stumpage collected from the timber sold.

2. AFRC is concerned about the number of acres impacted by moderate to severe root rot problems (about 44,100 acres), and the scoping Plan for commercial harvest on about 12,000 acres, which is down from an original analysis number of 21,000 acres. AFRC appreciates the 12,000 acres of commercial harvest the Forest has designated thus far in the project especially with all the resource demands. While the Forest outlined reasons for reducing the treatment acres due to rocky or unstable soils, wet areas, designated old growth, and other environmental or management concerns, we are unsure if these acres will ever get treated in the future or simply bypassed during this entry? We encourage the Forest to take one more look as you build your draft EA to see if some of the acres not considered for commercial treatment may be brought back in with modified logging systems or perhaps just optional units depending on markets.

3. Further, AFRC always encourages the Forest Service to treat as many acres as practical when preparing an EA or EIS. The expense of these planning documents are high and we feel it is important to get as much work done using this document. Treating more acres also adds to the timber volume that will be produced. The National Forests in Idaho are very important for providing the raw materials that sawmills within the State need to operate. The timber products provided by the Forest Service are crucial to the health of our membership. Without the raw material sold by the Forest Service these mills would be unable to produce the amount of wood products that the citizens of this country demand. Specifically, studies in Idaho have shown that 18 direct and indirect jobs are created for every one million board feet of timber harvested. Without this material, our members would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in. These benefits can only be realized if the Forest Service sells their timber products through sales that are economically viable. This viability is tied to both the volume and type of timber products sold and the manner in which these products are permitted to be delivered from the forest to the mills. There are many ways to design a timber sale that allows a purchaser the ability to deliver logs to their mill in an efficient manner while also adhering to the necessary practices that are designed to protect the environmental resources present on Forest Service forestland."

4. AFRC strongly supports the Forest's plan to conduct nearly all (98 percent) of the harvest using even-aged silvicultural systems, including clearcut, seedtree and shelterwood systems. This was one of our comments in our pre-scoping document and we believe this is needed to address the extent and severity of root disease, insect and storm damages found in the Project area.

5. With the various silvicultural systems mentioned above it will be necessary for harvest openings to be larger than 40 acres to address the root rot and other forest health issues. Of the 91 harvest units, 62 would result in openings larger than 40 acres in size in order to meet the desired objective. AFRC supports the Forest in requesting Regional Office approval for creating openings larger than 40 acres.

6. While AFRC members depend on commercial timber sales to run our businesses, our workers also enjoy the National Forests for their beauty and recreational opportunities. This project area is close to Hayden and Coeur d'Alene and gets heavy recreational pressure which we also support the need to improve. On our field trip last year we looked at several trails that could be improved and/or have the use designation changed to provide a loop opportunity for motorized wheeled vehicles, 50 inches or less in width. As part of these changes, the District is proposing the conversion of some trails on the southern portion of the system to better allow access for maintenance and emergency services. This change will also increase the access for < 50" trails for the recreating public, reduce dead-end trails on the system, and will help to spread use across a greater area. We strongly agree and support this work and would hope the Forest funds these projects from the retained receipts generated from timber sales from the Honey Badger Project.

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   The primary issues affecting the ability of our members to feasibly deliver logs to their mills are firm operating restrictions. As stated above, we understand that the Forest Service must take necessary precautions to protect their resources; however, we believe that in many cases there are conditions that exist on the ground that are not in step with many of the restrictions described in Forest Service EA's and contracts (i.e. dry conditions during wet season, wet conditions during dry season). We would like the Forest Service to shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results; in other words, describe what you would like the end result to be rather than prescribing how to get there. There are a variety of operators that work in the Coeur d'Alene market area with a variety of skills and equipment. Developing an EA and contract that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators. For example, restricting certain types of ground-based equipment rather than describing what condition the soils should be at the end of the contract period unnecessarily limits the ability of certain operators to complete a sale in an appropriate manner with the proper and cautious use of their equipment. To address this issue, we would like to see flexibility in the EA and contract to allow a variety of equipment to the sale areas. We feel that there are several ways to properly harvest any piece of ground, and certain restrictive language can limit some potential operators. Though some of the proposed area is planned for cable harvest, there are opportunities to use certain ground equipment such as fellerbunchers and processors in the units to make cable yarding more efficient. Allowing the use of processors and fellerbunchers throughout these units can greatly increase its economic viability, and in some cases decrease disturbance by decreasing the amount of cable corridors, reduce damage to the residual stand and provide a more even distribution of woody debris following harvest. Tethered-assist equipment is also becoming a more viable and available option for felling and yarding on steep slopes. This equipment has shown to contribute little additional ground disturbance when compared to traditional cable systems. Please prepare your NEPA analysis documents in a manner that will facilitate this type of equipment.

8. An intact road system is critical to the management of Forest Service land, particularly for the provision of timber products. Without an adequate road system, the Forest Service will be unable to offer and sell timber products to the local industry in an

economical manner. On our field trip we looked at roads that needed closed or work for improvement. We just ask the Forest to consider that any road decommissioning or obliteration will likely represents a ***permanent*** removal of these roads and could defer management of those forest stands that they provide access to. We would like the District to carefully consider the following three factors when making a decision to decommission any road in the project area:

1. Determination of any potential resource risk related to a road segment.
2. Determination of the access value provided by a road segment.
3. Determination of whether the resource risk outweighs the access value (for timber management and other resource needs).

We believe that only those road segments where resource risk outweighs access value should be considered for decommissioning.

Further, AFRC believes that a significant factor contributing to increased fire activity in the region is the decreasing road access to our federal lands. This factor is often overshadowed by both climate change and fuels accumulation when the topic of wildfire is discussed in public forums. However, we believe that a deteriorating road infrastructure has also significantly contributed to recent spikes in wildfires. This deterioration has been a result of both reduced funding for road maintenance and the federal agency's subsequent direction to reduce their overall road networks to align with this reduced funding. The outcome is a forested landscape that is increasingly inaccessible to fire suppression agencies due to road decommissioning and/or road abandonment. This inaccessibility complicates and delays the ability of firefighters to quickly and directly attack nascent fires. On the other hand, an intact and well-maintained road system would facilitate a scenario where firefighters can rapidly access fires and initiate direct attack in a more safe and effective manner.

If the Forest Service proposes to decommission, abandon or obliterate road segments from the Honey Badger planning area we would like to see the analysis consider potential adverse impacts to fire suppression efforts due to the reduced access caused by the reduction in the road network. We believe that this road network reduction could decrease access to wildland areas and hamper opportunities for firefighters to quickly respond and suppress fires. On the other hand, additional and improved roads will provide firefighters with quicker and safer access to suppress any fires that are ignited. The improved ability of fire suppression agencies to safely and effectively suppress fires starts should be considered and analyzed as a direct effect of road construction and road improvements.

9. The economic viability of timber sales in some areas of Region 1 has become problematic over the past couple years; particularly with the spike in "no-bid" timber sales in FY19 and now carrying over into FY'20. The Washington Office has become more engaged with exploring solutions to this problem by issuing instructions to the Regions on how to assess causes for no-bid timber sales and how to identify actions to remedy the problem. The latest guidance came via a letter dated March 19th and included

an attachment with "identified actions" for addressing no-bids. Some relevant action items included in that letter include:

- Project planning teams should conduct an initial sale feasibility and valuation analysis and reevaluate the feasibility throughout the course of the project.
- Rules should be reviewed often to ensure that Forest is not limiting harvest operations due to blanket rules and that limited operation periods are directly related to site specific concerns.

10. We would like to encourage the Coeur d'Alene District to consider a few documents related to carbon sequestration related to forest management.

McCauley, Lisa A., Robles, Marcos D., Wooley, Travis, Marshall, Robert M., Kretchun, Alec, Gori, David F. 2019. Large-scale forest restoration stabilizes carbon under climate change in Southwest United States. *Ecological Applications*, 0(0), 2019, e01979.

Key points of the McCauley paper include:

- Modeling scenarios showed early decreases in ecosystem carbon due to initial thinning/prescribed fire treatments, but total ecosystem carbon increased by 9–18% when comparted to no harvest by the end of the simulation.
- This modeled scenario of increased carbon storage equated to the removal of carbon emissions from 55,000 to 110,000 passenger vehicles per year until the end of the century.
- Results demonstrated that large-scale forest restoration can increase the potential for carbon storage and stability and those benefits could increase as the pace of restoration accelerates.

We believe that this study supports the notion that timber harvest and fuels reduction practices collectively increase the overall carbon sequestration capability of any given acre of forest land and, in the long term, generate net benefits toward climate change mitigation.

Gray, A. N., T. R. Whittier, and M. E. Harmon. 2016. Carbon stocks and accumulation rates in Pacific Northwest forests: role of stand age, plant community, and productivity. Ecosphere 7(1):e01224. 10.1002/ecs2.1224

Key points of the Gray paper include:

- Although large trees accumulated C at a faster rate than small trees on an individual basis, their contribution to C accumulation rates was smaller on an area basis, and their importance relative to small trees declined in older stands compared to younger stands.
- Old-growth and large trees are important C stocks, but they play a minor role in additional C accumulation.

We believe that this study supports the notion that, if the role of forests in the fight against climate change is to reduce global greenhouse gasses through maximizing the

sequestration of carbon from atmospheric CO2, then increasing the acreage of young, fast growing small trees is the most prudent management approach.

In closing AFRC would like to thank the Coeur d'Alene District for moving forward with the Honey Badger project. AFRC's comments are not meant to be critical, but rather intended to assist in getting the most work done and resources improved during this entry. Most likely this landscape will not be re-entered for 20-30 years post Honey Badger. I look forward to working with you as the project moves toward the Draft EA phase and then on to implementation.

Sincerely,

Tom Partin
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