



April 29, 2020

Kerry Arneson, NEPA Planner
US Forest Service, Coeur d'Alene Ranger District
2502 East Sherman Avenue
Coeur d'Alene, ID 83814

Subject: Honey Badger Project

Dear Ms. Arneson:

Idaho Department of Environmental Quality (DEQ) has reviewed the scoping documents for the Honey Badger Project (Project) and agrees with the US Forest Service (USFS) identification of the Project area as a priority landscape for forest management. Given the frequency and intensity of recent fires in the Pacific Northwest, DEQ recognizes the urgent need to improve overall forest conditions on federal lands in North Idaho. DEQ agrees with Project goals to improve forest health, reduce high-intensity wildfire risk, provide a sustainable trail system for the public, reduce sediment delivery to streams, and restore aquatic organism passage. DEQ appreciates that the Project will improve water quality and aquatic habitat conditions in several local water bodies. DEQ offers USFS the following reminders and recommendations in order to encourage continued prioritization of protections to Idaho's air, land, water, and public health:

1. DEQ respectfully reminds USFS that the Project must comply with Idaho Water Quality Standards (IDAPA 58.01.02) and rules pertaining to the "Idaho Forest Practices Act" (IDAPA 20.02.01).
2. Water quality pollutants of concern associated with the Project include sediment, nutrients, and temperature (heat). DEQ recommends that as Project managers develop and finalize Project plans, they consider how Project activities and long-term maintenance and management of the landscape may affect pollutant loads in receiving waterbodies, and seek to minimize such contributions.
3. The Project should be implemented consistent with restrictions of applicable Total Maximum Daily Loads (TMDL)s for waterbodies that could be impacted by Project activities. Table 1 provides the status of stream and lake assessment units (AU)s that either occur within the Project boundaries, or that could be impacted by the Project, based on the 2016 Idaho Integrated Report. AUs in Table 1 are categorized as either 3 (unassessed), 4a (impaired and an EPA-approved TMDL exists), or 5 (impaired and an EPA-approved TMDL is needed). Causes of impairment for each Category 4a AU are also provided in Table 1. Reduction of phosphorus contributions from all activities within the watershed is a high priority for DEQ and for the protection of Fernan, Hayden, and Coeur

d'Alene Lakes. Phosphorus often enters surface water as a sediment-bound particle, thus limiting sediment loads to surface waters will also limit phosphorus loads. DEQ encourages Project managers to prioritize methods that limit sediment and phosphorus entry into waters of the State. DEQ is available, and happy to discuss the status and protection of these water bodies with USFS throughout the NEPA process.

Table 1. Identification and status of assessment units that may be affected by the Honey Badger Project. Note that not all beneficial uses are listed. Only uses that are unassessed or not fully supporting are listed. CWAL: Cold Water Aquatic Life, SS: Salmonid Spawning, PCR: Primary Contact Recreation, NS: Not Supporting

Assessment Unit ID	Assessment Unit Name	Beneficial Uses	Support Status	Impairment Cause	Category
ID17010305PN005_02	Hayden Lake Tributaries to Lake and Rathdrum aquifer	Unassessed	N/A	N/A	3
ID17010305PN006_02	Yellowbanks Creek - source to mouth	Unassessed	N/A	N/A	3
ID17010305PN007_02	Jim Creek - source to mouth	Unassessed	N/A	N/A	3
ID17010305PN008_02	Mokins Creek - source to mouth	CWAL	NS	Temperature	5
		SS			
ID17010305PN009_02	Nilsen Creek - source to mouth	CWAL	NS	Temperature	5
		SS			
ID17010305PN010_02	Tributaries to Hayden Creek	CWAL	NS	Temperature	5
		SS			
ID17010305PN010_03	Hayden Creek - source to mouth	CWAL	NS	Temperature	5
		SS			
ID17010305PN011_02	Sage Creek and Lewellen Creek - source to mouth	CWAL	NS	Combined Biota/Habitat Bioassessments	5
		SS			
ID17010305PN005L_0L	Hayden Lake	CWAL	NS	Total Phosphorus	4a
ID17010303PN032_03	Fernan Creek - Fernan Lake to mouth	CWAL	NS	Temperature	4a
ID17010303PN033_03L	Fernan Lake	PCR	NS	Total Phosphorus	4a
ID17010303PN034_02	Fernan Creek - source to Fernan Lake	CWAL	NS	Temperature	4a
ID17010303PN034_02a	Fernan Creek	CWAL	NS	Temperature	4a
ID17010303PN034_03	Fernan Creek - source to Fernan Lake	CWAL, SS	NS	Temperature	4a
				Sedimentation	5

4. Given the total treatment acreage (i.e. 12,000 acres for timber harvest and 4,000 acres for burning), DEQ recommends USFS phase treatments through time and space to avoid cumulative effects of excessive hydrologic yield, erosion, and sedimentation to receiving waters. Planning should consider seasonal precipitation and snowmelt patterns, the frequency and timing of extreme precipitation events (e.g., high-intensity rain or rain-on-snow events), and soil moisture and runoff complexities.
5. Roads are major contributions of sediment to adjacent streams. DEQ recommends limiting the number of trails and roads immediately adjacent to streams and limiting the number of stream crossings where possible. If these options are not feasible, DEQ recommends USFS (1) make road and trail maintenance a top priority, especially where infrastructure runs adjacent streams, (2) to exceed the rules for maintenance pertaining to the Idaho Forest Practices Act, and (3) add additional riparian improvement activities to the Project to mitigate cumulative road impacts. DEQ is supportive of the recreational trail improvements currently proposed (i.e., reconstruction, realignment, and rerouting), and of plans to improve access for maintenance and emergency services. DEQ also supports USFS collaboration with local groups to maintain trail conditions through time. If not already in place, perhaps such collaborations could also consider adoption and implementation of a public outreach/education component to further facilitate a sustainable trail system.
6. DEQ respectfully reminds USFS that all burning activities are expected to conform to Montana/Idaho Airshed Group Operating Guide requirements, including but not limited to requirements of: registration, request to burn, and the burn approval processes - regardless of the season that burning occurs. DEQ anticipates Idaho-specific rules pertaining to all prescribed fire activity (natural fuels and activity fuels) will be enacted at some point before or during the implementation of the Project. Please be sure to update any burn plans accordingly as these rules become effective. DEQ appreciates the Idaho Panhandle National Forest Burn Boss's consistent use of appropriate smoke management practices during past projects, and encourages the continued use of such practices through the life of the Project. DEQ recommends fire plans anticipate response to potential unintended smoke impacts that burning could have on other prescribed fire activity in the area, such as private or state forest management burning. Increased monitoring of smoke impacts by deploying PM2.5 monitors in downwind populated areas is highly recommended. DEQ requests USFS consider applicable emission reduction techniques for burning.

Thank you for the opportunity to comment on this important project. If USFS would like to discuss these comments further, please call (208)769-1422.

Sincerely,



Chantilly Higbee
Water Quality Compliance Officer
Idaho Department of Environmental Quality
Coeur d'Alene Regional Office