

June 9, 2021

Dan Scaife,
Coeur d'Alene River Ranger District
Idaho Panhandle National Forest
2502 East Sherman Avenue,
Coeur d'Alene, ID 83814

RE: Comments on Proposed Activities on Honey Badger Project, EA and Draft FONSI

Submitted via email to: kerry.arneson@usda.gov
dan.scaife.@usda.gov

Dear Mr. Scaife,

Thank you for the opportunity to provide comments on the development and design of proposed activities of the Idaho Panhandle National Forest - Coeur d'Alene Ranger District's (Forest's) Honey Badger Project. We have reviewed the proposed activities in detail and are generally very pleased with proposed activities as a balanced solution for forest management and maintenance, habitat protection, and recreational opportunities. Thank you for your team's efforts in preparing the project.

The Trails Working Group (TWG) is recreational trails advocacy group with a combined membership of approximately 1,000 and over 6,000 social media followers and supporters. We are dedicated to trail building and maintenance, as well as volunteerism, education, advocacy, and youth participation. As a trusted partner with public land managers in the area, TWG volunteers contributed hundreds of hours of volunteer trail maintenance labor last year, and we are committed and on track to deliver hundreds more. Formed in 2017 as a grassroots solution to addressing trail maintenance, TWG has grown to include approximately a dozen organizations and become the District's primary trail building and maintenance group as well as an advocacy voice.

In the spirit of inclusion and transparency, we have considered of our member organization's goals and wishes for the Forest. Specifically, TWG members have collaborated on this comment letter. Our comments reflect a sincere effort to address key issues raised and balance often opposing viewpoints regarding forest management practices.

We believe that proposed recreation activities associated with the Honey Badger Project are sound and support many restoring and maintaining recreation management opportunities while maintaining the social and economic resilience of the area. The proposed activities also have sound road and trail density goals for watershed health and habitat connectivity/climate adaptation purposes, while maintaining access to important recreation infrastructure such as trails and campgrounds. The following are our concerns and recommended changes before the project is implement.

- While Honey Badger may not provide an ideal setting for providing new or enhanced recreation experiences for vehicles over 50”, the TWG recognizes this as an experience gap on the Ranger District and encourages the District to continue searching for opportunities to provide trails for this user group.”
- Consideration to adopt and update the “Straight Creek” Trail. This is a historical trail that provided access to the mine on Chilco Mountain. Initial review by the Forest did not support this proposal because the trail would provide access to the powerlines in the area, and the proposed junction to 437 was at a narrow spot in the road. The powerline in question is already accessed by Trail #802, Trail #69, Road #437, Road #406, and many more with little issue. The trail would not greatly increase the access to the powerlines, and in fact would share some intersection points with existing roads. The intersection of the trail with Road #437 was purely hypothetical and could be placed at a more secure location that would not lead to traffic safety concerns. This would require some on the ground reconnaissance which TWG would provide. TWG strongly encourages the Forest to reconsider adding this trail to the system. This trail would increase looping opportunities in the drainage and further disperse riders which in turns lessons use on #234 and reduces impacts to that trail. Ultimately the addition of this trail would serve to protect natural and recreational resources in the area. Because of the steep canyons and elk security mandates in this drainage it is extremely difficult to find locations where trails are feasible. Please take advantage of this trail that is mostly existing and does not infringe on wildlife security.
- Proposed reroutes and new single-track trails on Canfield Mountain should not be placed on existing roadbeds in the area. Purpose built trails designed and constructed in a more natural setting that include grade reversals are the most effective way to keep water from eroding the trail. Creating a grade reversal in an existing roadbed can be difficult, which in turn requires the agency to add water bars to the road/trail. These are man-made structures that require more maintenance and are more prone to failure than grade reversals. Purpose built trails in a natural environment will provide a higher quality user experience and will provide better resource protection than a road to trail conversion.

There has been a genuine effort by the Forest to address recreation infrastructure issues we have raised in our communication to the Forest, and we greatly appreciate the concerted effort by the Forest staff to consider current and future recreation infrastructure potential for the Forest. The proposed activities, along with the submitted comments, implement forest plan goals and objectives, while maintaining access to important recreation infrastructure such as trails and campgrounds. The TWG fully endorses and support the proposed actions and respectfully request the Forest address the bulleted items.

**Supporters of Trails Working Group Comment Letter on
EA and Draft FONSI**

Honey Badger Project #56220

Project location:

Coeur d'Alene River Ranger District

Backcountry ATV

Coeur d'Alene Snowmobile Club

Lake City Trail Alliance

North Idaho Trailblazers

North Idaho ATV/UTV

Panhandle Nordic Ski and Snowshoe Club

Idaho Trails Association

Panhandle Area Trail Riders Association

Panhandle Backcountry Horsemen

Brush Bunch Motorcycle Club

Gator Boyz Mudding and Offroad

City of Coeur d'Alene
Park & Recreation Department
