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November 24, 2021

Dear Ms. Neils-

Thank you for the opportunity to comment on the Rosie Cedar Project (CFO-TR-19-006) located in the Fernan Ranger District, Panhandle National Forest. I am not a forestry expert, therefore I will not at this time officially support nor object to this project. I will, however provide my thoughts, comments, and recommendations on a broader scale, and do believe some forest management is clearly justified (i.e., do not feel Alternative A, the 'No Action' alternative is appropriate).

Moreover, it is not possible for most private citizens, like myself, with limited resources, to analyze the substantial amounts of information associated with this project in detail. Thus, I apologize in advance if I'm raising a concern that you feel you have, or will in future drafts, adequately address.

Extent of Timber Harvesting

The size and number of clear-cuts, commercial thins, and seed-tree cuts proposed, from an aesthetic, fire prevention, and forest sustainability perspective is far too extensive. For example, I was disappointed that many units likely visible from I-90, Lake Coeur d'Alene's Wolf Lodge Bay, and Highway 97 are categorized as "Scenic Integrity Objective High" yet the map indicates they will be clear-cut, commercially thinned, or seed tree cut. I for one don't consider any of these types of logging "scenic." Hopefully I have missed something? Moreover, such intensive forest management is not necessary for fire management, and in most cases, for disease control. Logging adjacent to the BLM's Blue Bay area, or the Forest Service work at English Point, are more reasonable examples of adequately balancing aesthetics, disease control, and fire management in the Coeur d'Alene region.

As discussed, the size of the clear-cuts, commercial thins, and seed-tree cuts (clear cuts) is excessive, and do not directly relate to forest disease distribution (Rosie Cedar Project Area Forest Health Evaluation, September 2019 Trip Report. They are also excessive for fire management. While I don't disagree with the Draft EA, Table 4, that this project will greatly reduce fire, so does a parking lot. I do not believe the EA makes the case for why such large

habitat disturbances can be justified from a forest management perspective. Thus, the EA needs to better justify the economic and environmental pros and cons of what clearly is a large-scale commercial cut, not just forest management. I believe that a more environmentally balanced approach to this project will still generate revenue, albeit less than as currently described.

The Draft EA and Silviculture Report consistently discuss the ‘Desirable Conditions’ of the forest, and how this project will move us towards that goal. While I understand that after many, many years of forest management (or lack thereof due to a variety of reasons) has left us with forest stands that are less than desirable, a wholesale effort of intensive logging is not appropriate or necessary. While I am not familiar with your extensive Forest Plan FEIS, or the science behind ‘Desirable Conditions,’ a more sustainable approach to moving entire forests, not just acres, to this ‘Desirable Condition’ seems to be selective thinning, not clearcutting. In this case the long-term economic benefits may likely outweigh the short-term expense of selective cutting. Again, I am not very familiar with your Forest Plan FEIS, but would expect that your economic analysis fully examines the costs and benefits of intensive versus selective cutting.

Water Resources

In the Draft EA, Table 4, you state that a detailed analysis of effects to ‘Floodplains, Wetlands, and Municipal Watersheds’, ‘Water Quality’, and ‘Watershed Function’ is not necessary. Given the size and intensity of this project, I disagree. Sediment loading to surrounding streams from large, steep areas could be substantial for many years until these areas revegetate, no matter the berms, woody debris, or stream offsets you have in place. I am also unsure at this point what habitat restoration/reforestation will take place, so cannot at this point evaluate the duration of any potential adverse effects, and what exactly you mean by ‘short-term’ and ‘long-term’ effects.

In your ‘Hydrology Report’ you state that “The creation of openings larger than 40 acres in size would have the same types of impacts not have effects beyond those already analyzed.” I assume a slight typo in the sentence, but believe you are saying that the project will have no effect over and above current conditions? I find that difficult to believe. Most models of this sort make many assumptions, including uniform runoff over large areas. The reality of the situation is these models often do not adequately account for large storms generating ditches and other high-sediment generating regions, particularly in the years immediately following cutting. At the very least, I would like the project to better define site-specific monitoring and repair methods to address the uncertainties in modeling. Best Management Practices without site specific verification are questionable.

Also in the EA and Hydrology Report, Peak Stream Flows are predicted to rise only a few percent based on your analysis. While I am not familiar with the detailed inputs of your model, I would expect that you are taking into account high flood events and possible, isolated BMP failure. I would also expect that your model is additive with respect to existing sediment loading plus additional 1-5 year project loading, much like a water quality Total Daily Maximum Load (TMDL) analysis. The point here is that short term, high intensity events can result in impacts to

streams and lakes that may be obscured in an analysis that averages runoff consequences over long time periods.

Following, the assumption that the ‘No Effect’ alternative might actually be worse for water quality is misleading. The Forest’s failure to maintain the proper condition of roads and culverts is extremely problematic, and should not be part of any kind of baseline analysis. The effects analysis must again be additive, considering the ongoing effects PLUS the potential new project related effects. This way we have an idea of the full impacts from this action.

Old Growth Harvesting

At one point, your analysis (Draft EA, Table 4) states there will be no harvesting of ‘Old Growth’ as defined in Green et al. (2011), yet you then later describe harvesting 48 acres of sub-standard pre-old growth. In your Silviculture Report you argue that these areas will be cut ‘...due to the lack of long-lived species in the larger diameter classes and the presence of existing insect and disease within the stands.’ I do not have the expertise to fully evaluate this analysis, but, if at all possible, I would prefer a careful culling of highly diseased trees and younger competitors. We have so few trees approaching large, old growth in Idaho, that Old Growth harvesting is only acceptable in the rarest of circumstances, and the economic justification is never sufficient from a wildlife perspective. Please modify your treatment of these 48 acres.

Roads

Because of the size and logging intensity of this project, an extensive road system is planned. While I understand that any logging project requires some road upgrades and building, the magnitude of this cut requires an extensive road system that further degrades wildlife habitat and can result in high sediment loading prior to road removal and vegetation re-growth. Once again, my preference is that the project is scaled back with an associated decrease in road work.

Economic Considerations

The 4-page economic analysis is inadequate. Perhaps in a full EIS this analysis would be more robust, which may be one more reason to support a full EIS. An adequate economic analysis would evaluate the balance between project costs and gains, from both a public and private perspective. Long term versus short term costs to environment, scenic views, lake and forest recreation, tourism, etc. Perhaps the Forest Plan FEIS has a more robust analysis, but because of the proximity of this project to the Coeur d’Alene region, and streams that drain to Lake Coeur d’Alene, a more robust site-specific analysis is required.

Recreation

The Draft EA is consistent in asserting that while there will be ‘short-term’ adverse effects to this or that, the ‘long-term’ effects will be beneficial. I am not clear on the definition of long and short term, and would argue that anything more than 5 years is ‘long-term’ when it comes to people’s perceptions. Any economic analysis of costs/benefits must consider the variable impacts over time, so it truly reflects the year-to-year costs and benefits to people. An analysis averaged over 30 years is misleading. In other words, from my late 58-year-old perspective, a cleared forest is lost to me for most of my remaining days, particularly from a recreational and aesthetic perspective.

Inspections & Monitoring

Given the size and intensity of this project, a detailed site-specific monitoring, inspection, and failure restoration plan is necessary. This cost should be incorporated into the economic analysis.

Fisheries

The Draft EA, Table 4 identifies cutthroat trout as the focus species for analysis. The seems appropriate, and effects to it will be a reasonable surrogate for overall in-stream ecological effects. Please re-analyze episodic, short, and long-term effects with consideration of the concerns I have raised regarding your Hydrology Report. In addition, a project monitoring plan should include, at the very least, a regular analysis of suspended sediments and embeddedness in key stream locations most susceptible to project related runoff.

Wildlife

I agree with the determination that threatened and endangered species will not be affected by the project. I do not, however, believe that the project will have no adverse impacts to other species, that do not bear the official moniker of “sensitive.” This project will substantially affect habitats for wildlife, and thus wildlife itself, for many years to come. The EA should fully disclose and analyze these impacts, and consider them in their economic analysis. A project with this many large openings will undoubtedly alter bird and other wildlife use of the area for years to come.

Habitat Restoration

Detailed habitat restoration/reforestation plans are needed for the entire project, but particularly for large open areas, steep areas, areas close to perennial streams (outside buffer zones), and those with aesthetic characteristics. Again, I do not believe that the Forest Plan FEIS is adequate for an area as vital and unique as this.

Summary

Coeur d'Alene and Idaho's economy depends on many factors, particularly its beauty and clean, healthy forests, lakes, and streams. And as the American Forest Resource Council has already highlighted in their comment letter on this project, our timber industry. But just like any public project, we must balance short term economic gain with longer term sustainability and the uniqueness of the Coeur d'Alene region. Thank you for consideration of my concerns, comments, and recommendations. Please feel free to reach out to me for clarification or additional detail.

Sincerely,

/s/ *Russell MacRae*

Russell MacRae