June 9, 2021

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

Dear Kerry:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide Draft EA 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.

The comments provided below are based partly from a very informative field trip with the Forest and District to the project on June 26, 2019. AFRC also submitted scoping comments on April 27, 2020. We appreciate your review and inclusion of our input into this Draft EA.

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 and Need for the Project which includes:

- 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.
- There is a need to contribute to local economies.
- Develop, restore, and maintain a sustainable recreation trails network.

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

In the Draft EA, the District outlined that many comments received centered around the use of trails and the interest in an open shooting range and other recreational opportunities. Both of these recreational uses need oversight and planning, but we believe remain compatible with the outlined silvicultural prescriptions.

AFRC offers the following comments to generally support the Draft EA, but also to point out how the Project could benefit our members and local communities.

1. AFRC is pleased to see that the District has added a need to contribute to local economies to the Purpose and Need. AFRC's members' ability to harvest and remove timber products from the timber sales generated off this project is paramount. 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 healthy 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 considerable restoration work needed post-harvest in the Project area and much of that work will be funded through the stumpage value generated from the timber sold.

   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 18-20 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.

AFRC believes the District has done a very good job on analyzing the economic impacts of the Project in the table below:

Table 23. Estimated economic return per MMBF of timber harvested.

Economic Return	Jobs per million board feet (MMBF)
Forest products industry jobs created or sustained	20 jobs per 1 MMBF
Revenue to communities through wages and salaries	$667,000 per 1 MMBF
Revenue to communities through sales of goods and services	$3,850,000 per 1 MMBF

Based on the anticipated timber volume, the proposed action would be expected to support multiple (possibly 5-7) timber sales implemented over a period of about 7 to 10 years beginning in 2023, as well as implementing the proposed restoration activities. Reforestation would be completed after harvest activities and may take three to five years to accomplish.

2. AFRC supports the Project vegetation treatments as outlined in the table below. We believe that treating 42 percent of the Project area on National Forest lands with a combination of commercial and non-commercial treatments will accomplish the Purpose and Need as proposed.

   Approximately 200 mmbf of timber products generated from the 12,500 acres of commercial treatment will be of tremendous support for AFRC member sawmills, counties beneficiaries and communities that depend on timber-related jobs.

Table 1. Summary of proposed vegetation management activities.

Silviculture Prescription	Estimated Acres	
Clearcut with leave trees	5,200	
Seedtree with leave trees	1,700	
Shelterwood with reserves	5,000	
Commercial thin	350	
Total acres commercial harvest		12,250
Natural fuels burning (without timber harvest)	5,500	
Total acres noncommercial vegetation treatments		5,500
Total estimated acres of vegetation treatments		17,750

3. To ensure the timber sales planned for this Project area are economical, we would like to remind the District that the primary issues affecting the ability of our members to feasibly deliver logs to their mills are firm operating restrictions. 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 and contracts in a manner that will facilitate this type of equipment.

4. 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 improvement work to remain open.

   We 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.

   The summary of road work is listed below:

Table 2. Summary of road work associated with proposed vegetation/fuels activities.

Activity	Estimated Miles
Permanent/system road construction (to be stored after project is complete)	35
Heavy reconstruction on undesignated roads that still have a discernable road prism; analyzed as new construction	15
Temporary/nonsystem road construction (to be decommissioned after project is complete)	10
Convert nonsystem to system	35
System road reconstruction/reconditioning	195

Table 3. Summary of proposed aquatic restoration.

Activity	Estimated Miles
Existing system roads to be decommissioned	5
Existing system roads to be used then put in long-term storage	95
Approximate miles of non-system roads to be decommissioned[1]	10

[1] *Approximately 95 additional miles of nonsystem roads were verified as being decommissioned on the ground and simply need the status corrected in the road database.*

We would like the District to carefully consider the following three factors when deciding to decommission any road in the project area:

- Determination of any potential resource risk related to a road segment.
- Determination of the access value provided by a road segment.
- 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 attack nascent fires quickly and directly. 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 suppress fires starts safely and effectively should be considered and analyzed as a direct effect of road construction and road improvements.

5. AFRC supports the Forest in seeking Regional Office approval for the creation of openings larger than 40-acres. Under the proposed action, timber harvest would result in approximately 60 openings larger than 40 acres. These openings will be needed for forest health treatments in root rot pockets, for the creation of early seral species for wildlife, and to help in establishing more ponderosa pine, white pine, and western larch across the landscape.

6. 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 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.

Using these harvest methods, the number of shade-tolerant species (primarily grand fir and western hemlock) would decrease by more than 5,300 acres, and Douglas-fir cover types would decrease by about 3,600 acres as a result of vegetation management activities. The post-harvest cover type for all of the regeneration harvest acres is classified as a shade-intolerant conifer mix cover type because the regenerated areas would be planted primarily with combinations of western white pine, western larch, and ponderosa pine.

7. With approximately 85% of the project area within the Wildland Urban Interface, AFRC supports the Plan which calls for harvest and prescribed burning activities altering the fuels environment at all levels by reducing overall fuel loading, reducing ladder fuels (increasing canopy base height), reducing canopy bulk density, and increasing the spacing of canopy fuels. The proposed action would result in a decrease in potential acres of crown fire, thereby decreasing the severity of fires, with the most noticeable reduction in stand-replacing fires versus mixed and low-severity fires.

8. AFRC would like to thank the District for considering the information that we submitted on carbon sequestration. The Forest's response was: "Tom Partin, (Consultant for the American Forest Resource Council) encouraged the Forest Service to consider two documents (McCauley et al. 2019) and (Gray et al. 2015) related to carbon sequestration associated with forest management. These references were all thoroughly considered as documented in PF Doc. VEG-026.

   We believe this documentation will strengthen the EA's documentation on a very important issue.

In closing AFRC would like to thank the Coeur d'Alene District for the good job in planning the Honey Badger project. I look forward to working with you as the project moves toward implementation.

Sincerely,

Tom Partin
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