HAYDEN LAKE WATERSHED ASSOCIATION

P.O. Box 3583
Hayden ID 83835

June 14, 2021

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

Dear Sir/Madam:

Thank you for the opportunity to comment on the proposed plans the Forest Service has developed for management of the Honey-Badger planning unit. A large part of the planning unit is in the watershed of Hayden Lake. Sixty-three percent of the lake's watershed is public land managed by the Forest Service. As an Association primarily concerned with the quality of our lake, the health of our watershed and the unique environment of our area, the Association is deeply concerned with the actions that will be taken in the federally managed part of the lake's watershed.

HLWA is disappointed that the issue of lower FSR 437 (Hayden Creek Road), the shooting range, and abuse of the forest in this area were not addressed as part of the Honey-Badger Project even though the Association provided constructive solutions. The Association is further alarmed that no timeline is provided for a separate decision process that is simply alluded to in the Environmental Assessment. The Association urges the Forest Service to address this issue as soon as possible with a working group. We request a timeline for this planning effort.

The road analysis identifies FSR 437 has the highest risk of all roads to resources. We understand the roads benefit to National Forest access, as a collector and an arterial. Most of the adverse impacts are focused on lower FSR 437. All of these are compelling reasons to close and decommission lower FSR 437, especially since an alternate lower impact route has been suggested to the Forest Service.

Fair warning is provided here, the Association intends to educate its members and others on the impact of FSR 437 on Hayden Creek and hence Hayden Lake and the abuse of national forest land in lower Hayden Creek to include the shooting range that has received at best "band aid solutions" by the Forest Service for years.

The Association expected to see some effort to improve drainage under the massive fills on the Ohio Match Grade (FSR 206). In page 16 the Environmental Assessment (EA) states that only road improvements needed to support the proposed vegetation management would be implemented. This is a vague statement that does not reassure the Association that anything will be done about the drainage of the massive Ohio Match Grade fills. The Association views these massive poorly drained fills as ticking

time bombs capable of mass failures that will bleed sediment and nutrients to Hayden Lake. We note on page 48 & 49 that road decommissioning is used to balance sediment yield from new roads, but one failure of a massive Ohio Match fill would in one instance negate all gains from decommission of the roads slated for this action.

FSR 206 is rated by the road analysis as high risk and high benefit. The road exceeds the risk threshold set by the process, standing out as a problem requiring a fix. The road is high benefit as both a system collector and arterial. The road is designated as a primary haul road for project implementation. The Association would have thought that KV funds developed from the timber sales or other funds would be earmarked to improve the drainage under the massive fills of this important road.

The plan proposes 12,000 acres plus for harvest and nearly as many acres of controlled burns over a ten-year horizon. It is a well-established fact that vegetation removal caused increased plant growth nutrient export from a watershed, especially nitrogen and phosphorous. Sedimentation analysis does not necessarily address plant growth nutrient export. Nutrient export analysis to a high-quality lake should not be neglected. Certainly, the timing of project implementation might mitigate this impact, but no analysis is provided simply an arbitrary ten-year project implementation schedule. The Forest Service should provide a consideration of nutrient export and some justification of its implementation schedule.

The Environmental Assessment honestly admits that in the near and short term the viewshed of Hayden Lake will be noticeably altered (see page 23 Scenery Effects Analysis). In fact, altered for up to forty years after the action is commenced (10 years of implementation and up to 30 years return of the openings to young forest). However, the analysis fails to consider actions in the viewshed that will occur before or shortly after the recovery occurs.

The proposed actions only deal with roughly half of the planning unit's acreage. The vegetation analysis demonstrates that vegetation management goal to reduce the grand fir-hemlock forest stands is only just met. Hence it is logical to assume the agency will want to address more acreage likely before the projected time of recovery. If this is indeed what is expected, then the public should be made aware that the viewshed is not likely to return to any semblance of its current view in even the lifetimes of currently young children. If this is not resonating with the Forest Service, it should consider that the Deerfoot Cutting Units are clearly visible from Hayden Lake nearly thirty years after their harvest.

Page 15 of the Environmental Assessment speaks to the Honey Badger actions being compliant with Deerfoot and Kootenai Fuels actions. However, this statement is not elaborated on. Does this mean that Kootenai Fuels, Deerfoot and Honey Badger will continue fuel abatement actions taken into time? The question has been asked previously in earlier Association comments. Response to our earlier comment would have been a place to answer this question, yet no substantive response to our comment was forthcoming.

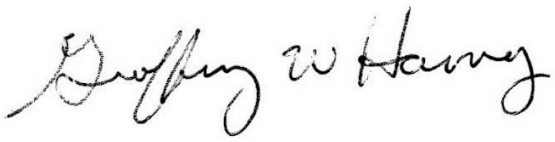
Many of the clear-cut opening proposed for the project are in excess of the forty-acre limit in the National Forest Management Act. The Forest Service argues larger units are needed to substantively alter the forest stand composition from near climax to young seral stands. A variance will be sought from the

Regional Forester. However, larger opens will likely create more windthrow and hence even larger openings. The issue of blow down of additional timber at the margins of the massive timber units proposed is not addressed. We only see winds and windstorms increasing in velocity. It seems this should be addressed, because due to blow down very large opens could well become much larger to massive.

Finally, HLWA concludes the Finding of No Significant Impact (FONSI) proposed incongruent with the proposed actions and their assessed impact on the environment. We recognize the proposed action is tiered under the current Idaho Panhandle National Forests Plan, which underwent thorough environmental assessment. However, this plan proposes clear cut harvest not a little above the forty-acre limit of the National Forest Management Act, but some cuts pushing ten times this limit and at least one twenty times. The visual impacts to the viewshed of Hayden Lake and the Coeur d'Alene-Hayden Area in general will be significant and last at least forty years, if further entry does not occur twenty to thirty years after the harvest proposed is completed. Although sedimentation is accounted for through sediment abatement from road closures, the assessment does not address increased export of those nutrients that would foster algal growth in Hayden Lake. Given just these issues, we believe the documentation will require far more work to support a finding of no significant impact.

With questions or for clarifications contact: Geoff Harvey at Whitefish48@Yahoo.com or 208-762-1246.

Sincerely,



Geoffrey W. Harvey
President, Hayden Lake Watershed Association