



August 31, 2021

P.O. Box 3583
Hayden ID 83835

Objection Reviewing Officer
USDA Forest Service, Northern Region
26 Fort Missoula Road
Missoula, MT 59804

Re: Honey Badger Project Objection, Coeur d'Alene River Ranger District, Idaho Panhandle National Forests, Danial Scaife Responsible Official

Dear Reviewing Officer:

The Hayden Lake Watershed Association Inc., a 501(c)(3) nonprofit organization (Federal EIN# 86-1130379) represents over 200 households around the Hayden Lake and in its watershed. The Association has commented during the project scoping and on the proposed plans-environmental assessment-FONSI developed by the Forest Service for management of the Honey-Badger planning unit. Our letters of comment are attached. The scoping letter of comment and the comment on the environmental assessment and FONSI specifically address the basis of the Association's objection.

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 water 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. The Association has been actively engaged throughout the public process. Its strategy has been to illustrate to the Forest Service problems in the watershed that the Association believes deeply should be addressed. We have been satisfied with the Forest Service's previous remediation projects, or by our own investigations, that some of those concerns have been addressed in whole or in part. However, other issues of great importance to the maintenance of our high-quality lake have been set aside from the Honey-Badger draft decision. Specifically, management actions to address Lower Hayden Creek Road (FSR 437) have been left out of any Honey-Badger Decision and relegated to another process which is unscheduled. That process is apparently subject to the priorities of the Idaho Panhandle National Forests. Because of this omission in the Honey-Badger draft decision, the Hayden Lake Watershed Association objects to the draft decision.

Addressing a road, that owing to its poor location sheds sediment during all runoff events to lower Hayden Creek a scarce mile above its entry into the lake, has not been deemed as important enough to be included in the plan. The fact that abuse of the forest lands along this corridor and immediately above it are a “poster child” for the abuse of our national forests, seems not to be important enough to be addressed in the near future. The unofficial shooting range along the corridor could easily be reported to EPA as a RCRA site and owing to the demolition by gun fire of all manner household appliances, quite possibly as a CERCLA site. The Association maintains these abuses of our lake’s watershed are as important as the ubiquitous root rot plaguing the forest and advanced forest stand succession. Accordingly, we want the lower FSR 437 issues addressed.

The Association has provided video evidence documenting the export of sediment from FSR 437 into Hayden Creek (<https://www.youtube.com/watch?v=ydsqbgKI1LY>)- The Association has provided the Forest Service with a route to replace lower FSR 437 on the drier southeast aspect of Hudlow Mountain (attached). The Association has counseled the Forest Service that the use of the gun range comes up to the level of an organized use of forest lands that should be governed under a cost share or other agreement with a group willing to take responsibility for site maintenance and management. The Association can provide a master plan that will address these issues and still permit legitimate use of these forest lands by all. In summary, the Association, through its comments, has provided some solutions and has additional solutions to ongoing problems in the watershed, but we are left with no forum and no meaningful commitment by the Forest Service to a process designed to address these issues. Hence, our objection, because, if this opportunity is lost to address the issue of lower Hayden Creek Road and the abuses along its corridor, we have little confidence that any remediation process will take place any time in the near future. Meanwhile the sediment from the poorly located road and adjacent abuse and the potential hazardous materials from the shooting range continue to pollute the lake central to the watershed.

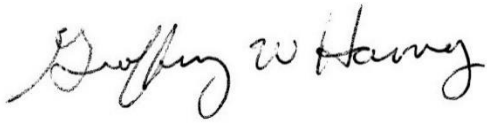
The Association is wary of the sheer size of some of the clearcuts proposed and the five-year implementation time frame envisioned in the Honey-Badger Plan, but will not object. We recognize that one goal of the project is to imitate stand replacing fires that would replace late successional trees with more fire and disease resistant seral trees. We further recognize this strategy cannot be efficiently implemented with forty-acre cuts. With implementation of INFISH stream protection measures and the natural tendency of forest ecosystem to conserve nutrients, there is a reasonable expectation that no measurable export of plant growth nutrients to the lake will occur. Nutrients are most often carried attached to sediment. Road construction/reconstruction and road decommissioning/storage are nearly equal, so the expectation is of no net sediment yield as long as BMPs are rigorously applied. If these expectations are incorrect, our regular monitoring of Hayden Lake’s plant growth nutrients, chlorophyll, and phytoplankton will detect adverse changes. We have a documentation of an over thirty-year monitoring record of nutrients and chlorophyll in the lake, and the long-term averages and variances are well established. Phytoplankton monitoring now spans over six years. Should there be adverse impacts to these lake water quality parameters, the Forest Service can expect the Association to oppose further

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implementation in the proposed manner and at the proposed pace of the project by all means at the Association's disposal.

If there are questions concerning the Association's objection or any other matter addressed in this letter, please direct these to Geoff Harvey at this address or to Whitefish48@yahoo.com. We are ready to discuss any point further at the Forest Service's convenience.

Sincerely,

A handwritten signature in black ink that reads "Geoffrey W. Harvey". The signature is written in a cursive, flowing style.

Geoffrey W. Harvey, President
Hayden Lake Watershed Association

c. Danial Scaife, District Ranger
Kerry Arneson, NEPA Coordinator