

Data Submitted (UTC 11): 11/29/2021 8:00:00 AM

First name: Ben

Last name: Irely

Organization:

Title:

Comments: I am submitting the attached comment letter on behalf of the Panhandle Forest Collaborative.

November 20, 2020

Dan Scaife, District Ranger

Coeur d'Alene Ranger District

Idaho Panhandle National Forest

RE: Rosie Creek Project

Dear Dan,

The Panhandle Forest Collaborative would like to offer comments on the Rosie Cedar project, located on the Coeur d'Alene Ranger District. We appreciate the field trip led by Chandra Neils that several of us attended, and the opportunity to comment. We have some preliminary comments based on that field trip and from the scoping letter.

We support leaving the larger diameter trees, especially red cedar, western larch and Ponderosa pine. On our field trip we discussed leaving clumps or strips of trees for wildlife and appearance. Because there is not much cedar being planted on the private timberlands in Northern Idaho we would encourage the FS to plant cedar in some of the regeneration units. Other areas would be thinned and pruned. From our field trip it appears there are many dense stand

of trees that can use treatments, including tree removal and prescribed fire. The treatment of units that are not commercially viable should still be considered, since improvement to resilient trees are important for the future of healthy forest stands. There is apparently an area where some intermediate age white pine are doing well, which means they might be resistant to blister rust. (unit 25). These trees should be protected if possible.

The Rosie Cedar project area is about 14,000 acres. About 3500 acres of regeneration are proposed, which is 25% of the area. We understand units and acreage will likely decrease during analysis. We recommend limiting the total equivalent clearcut area within all project area watersheds, including private, state, and public lands to twenty percent or less. Equivalent clearcut areas in excess of twenty percent can measurably alter the timing and duration of peak run off. If run off occurs earlier and over a shorter duration of time than would naturally be expected, then stream temperatures can increase even if riparian buffers are retained. From the project map, it looks as though appropriate riparian buffers have not been fully applied to units 41, 104, 106, 109, 202, and 204. We would like to ensure that appropriate riparian buffers are applied.

Improvements to water quality and watershed health are important components of timber projects. There are 7 miles of new road construction being proposed. We recommend limiting new or temporary road construction and new stream crossings. The Forest Service should also survey the existing road system to identify potential sediment sources. Road decommissioning or realignments should be considered to reduce sediment production and delivery. Riparian road segments should be graveled to limit sediment production and delivery as well. We understand that if culverts are needed it would generally mean it could not be a temporary road. Part of the project work has been done with the Good

Neighbor Authority. We understand that a GNA project does not allow for new road construction, so this should be clarified by the IPNF. A GRAIP analysis has not yet been completed but sediment sources will be an important area for mitigation.

With regards to wildlife, there is a 3500 acre elk security area located within the project area that needs to be enhanced since it currently is not meeting the standards due to motorized intrusion on closed roads. This is a popular hunting area and breaches of gates are common, so it was discussed that obliteration or partial obliteration of roads would be a better option. We support protecting old growth in the project area, as well as looking at protecting wildlife corridors, rare plant and animal species, and opportunities to restore riparian areas and any wetlands. Please let us know where old growth is, how it will be maintained, and how it will be replaced over time.

Large portions of the Rosie Cedar project area are steep and would require skyline logging. We recommend that the option of using tethered logging be considered, since it is an up and coming system that is proving very effective, and the workforce to use skyline logging keeps declining. There has been a study by Oregon State U. on the impacts tethered logging that should be considered. One unit is being looked at for helicopter logging, which is usually not economically feasible and should be avoided if possible.

We look forward to working with your team as the project progresses and sharing our input!

Sincerely,
Liz Johnson-Gebhardt Mike Petersen
Co-chair Co-chair