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Comments: Please find attached my comments on the Rosie Cedar Project

Janet Torline

Chandra Neils, Rosie Cedar Project Leader

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Ms. Neils,

I appreciate the opportunity to submit comments on the Rosie Cedar Project (CFO-TR-19-006) located in the Coeur d'Alene Ranger District of the Idaho Panhandle National Forest. As a citizen who is deeply invested in our national forests, I have grave concerns about the scale and scope of the Rosie Cedar Project.

I have lived on the east side watershed of Mt. Coeur d'Alene for 47 years and have witnessed habitat loss, stream depredation, invasive plants, unmitigated road building (and the fleets of ORVs that use them like their private playground) due to the many timber sales the USFS has put forth over the years in the area enclosed by Interstate 90, SH- 97 and SH-3. This is the same geographical location the 14,387-acre Rosie Cedar timber sale proposes to log. It feels like this area should be designated what it has become [ndash] a sacrifice zone.

#### WATER

Looking at the project units map the size and number of clear-cuts, commercial thins, and seed-tree cuts proposed are far exceed what is needed for wise forest management. Esthetically speaking, the public does not distinguish between these three categories of logging. They all look horrible and many of them will be visible from I-90, Lake Coeur d'Alene, and SH-97. Moreover, such intensive logging is not necessary for fire management or disease control, nor does it preserve wildlife habitat or water quality.

It is astonishing that of the 3,775 acres to be logged that 27 openings range from 44 acres to 267 acres! These large clear-cuts open the forest canopy which subsequently allows the brush to fill in [ndash] the very fuel that is

most easily ignited by lightening or human causation.

In addition, large openings do not retain the snowpack necessary for the slow, steady release of water in the spring that keeps streams colder and fuller through the summer and results in having a negative impact on fisheries. On top of that, should the project area get a [ldquo]rain-on-snow[rdquo] event, which this has historically proven to be one of the locations most prone to such events, the water released from large openings is so rapid it causes major flooding, not to mention the high increase of sediment loading into the waters.

The water modeling used in the EA is either grossly flawed or inadequate.

## ROADS

The Idaho Panhandle National Forest is the most heavily roaded national forest in the country. This project proposes 102 miles of road work in one form or another, with 19 miles of new roads, 11 miles of [ldquo]temporary[rdquo] roads and 47 miles of reconditioned roads all of which have soil disturbing, sediment producing outcomes. Increased roads are also directly proportional to decreased wildlife habitat. Even if a FS road is [ldquo]closed[rdquo] ORV and ATV uses simply ignore the burns or gates and make trails around them. I have witnessed this in many instances firsthand in this project area [ndash] and the surrounding national forest. This motorized traffic into forest habitat is bad for wildlife. The USFS seems ill equipped to stop these violations. More roads = more problems in this regard.

The USFS has a record of failing to maintain the proper condition of roads and culverts. The backlog of maintenance for exiting roads is overwhelming and somehow these timber sales never seem to generate the funds necessary to do the restoration work they claim they will. Projects like Rosie Cedar only add to the problem.

## INVASIVE SPECIES WEEDS

It is no mystery that all logging, particularly clear-cuts, is followed by a plethora of invasive species weeds [ndash] thistle, mullan, napweed, tansy, Japanese thorn. These invaders spread along the forest roads. The seeds are carried by logging trucks and other equipment. They are impossible to get rid of. In the 47 years I have lived next to the project area I am appalled with how they have taken over and penetrate into the forest.

## OLD GROWTH

I question whether the IPNF has the Old Growth or recruitment inventory that meets its Forest Plan. I would like to see those numbers added to the EA. Large diameter trees are critical habitat to several species and should be retained. They are of more value in sequestering carbon than being turned into saw logs. The project area has a lot of big, old trees including some wonderful cedar, that surely come under Old Growth classification.

## CLIMATE AND CARBON

Natural disturbances to forest trees such as insect and disease mortality release very little carbon and continue to store carbon long into the natural decaying process. Besides continuing to store carbon the byproducts of decomposition provide nutrients for soils, flora and new tree growth. In fact, harvesting timber on the scope and scale (high severity) of the Rosie Cedar project will release tremendous amounts of carbon into the atmosphere.

The argument in the EA is that the species being selected for logging such a Douglas Fir are host species to insects and disease:

[ldquo]it is reasonable to anticipate that carbon stocks, in the absence of more severe disturbances, have been declining and will continue to decline at the project scale under a no action scenario.[rdquo]

This decline, however, is very minimal over a long period of time while also providing the proper conditions for natural regeneration. Forests have been doing this and thriving for millions of years without any management.

Additionally, there is no evidence that this natural decomposing debris increases the risk of destructive wildfires. That is pure nonsense. The reality is the fine fuels such as brush and post logging dog hair trees are the primary igniters for wildfires. All categories of logging from clear-cuts to shelterwood create conditions for the most fuel loading and INCREASE the potential for wildfires. On top of that, large openings dry out the soil and flora and allows wind to gain momentum which increases the risk of catastrophic fire. There is no evidence that treated forests prevent or even slow down severe wildfires. Besides which, where a fire might break out is a complete unknown so treating for fuels reduction is a fool's errand and a waste of taxpayers' money.

The Conclusion in the Rosie Cedar Carbon Effects analysis states:

In summary, this proposed action impacts a relatively small amount of forest land and carbon on the Idaho Panhandle National Forest and, in the near-term, might contribute a small quantity of change in carbon relative to national and global scales.

in the near term is another way of saying short-sighted. This is exactly the problem. It is time the USFS works with the natural, long-term processes that truly make for a healthy forest and abandon being in the servitude of the short term private gain objectives of the timber industry.

Given the climate change/crisis we are facing there is no excuse to be facilitating de-forestation in any form as the global cumulative effects of a carbon loaded atmosphere are accelerating at a life-threatening pace.

#### CONCLUSION

As a citizen who these national forests belong to, I support the NO ACTION alternative until such time that the scope and scale of this project can be fully vetted for all environmental and climate consequences that would contribute to negative cumulative effects.

Respectfully submitted,

/s/ Janet Torline

Janet Torline