

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

August 31, 2021

Subject: Objection to the Honey Badger Project

To whom it may concern:

We are writing on behalf of the Panhandle Forest Collaborative (PFC) to file this objection to the Honey Badger Project. The 52,600-acre project area is located on the Coeur d'Alene River Ranger District near Hayden Lake, Idaho. Dan Scaife is the responsible official.

According to the Draft Environmental Assessment (EA), the purpose of the project is to (1) establish and maintain healthy and resilient forest stand structure and species composition; (2) reduce the potential for high intensity wildfire while promoting desirable fire behavior characteristics and fuel conditions; (3) contribute economic benefit to local communities and the general public; (4) develop, restore and maintain a sustainable network of recreation trails; and (5) maintain or improve hydrologic connectivity, water quality and aquatic species habitat (EA, page5).

To accomplish these goals, the Coeur d'Alene River Ranger District proposes 12,250 acres of commercial timber harvest and 5,500 acres of natural fuels burning. Proposed road work includes 50 miles of road construction, 10 miles of temporary road construction, addition of 35 miles of non-system roads to the Forest Service transportation system, 195 miles of road reconstruction, 15 miles of road decommissioning, and 95 miles of road storage. A combination of trail construction, reconstruction, and decommissioning would result in a net increase of 12 miles of non-motorized trails, 1 mile of motorcycles trails, and 12 miles of ATV trails. Finally, a culvert under road 437 that is blocking fish passage will be replaced.

The PFC has been involved throughout the planning process and supports the stated objectives of the project. The collaborative authored a letter of support for the proposed action on June 5, 2020. The PFC also commented on the EA and Draft Decision Notice (DN) on June 16, 2021. While the PFC membership largely continues to support the project, the collaborative is filing this objection because we think that the conclusions in the EA must be supported with data and relevant scientific information in order to satisfy the requirements of the National Environmental Policy Act (NEPA).

The Honey Badger Project is the largest timber sale in the history of the Idaho Panhandle National Forests (IPNF). If the project is to be successfully approved and implemented, then the final EA must be defensible. This is critically important to members of the collaborative who must sell and defend this project publicly. Defensible environmental reviews are the proof upon which the groups represented in the PFC rely when they tell their members that a project will improve environmental conditions or avoid or mitigate environmental impacts.

The PFC also understands and appreciates the Forest Service's interest in avoiding voluminous environmental reviews and analysis paralysis. We believe that it is possible to draft concise EAs that are supported with data and the best available scientific information. In fact, the IPNF has demonstrated

that the forest is capable of drafting quality EAs that aren't hundreds of pages long. The Buckskin Saddle and Westside Restoration Projects are evidence of that.

In summary, the objective of the PFC in filing this objection is not to put a halt to the Honey Badger Project. The collaborative believes that it plays an important role in creating the social license for the approval and implementation of projects that restore forest health and improve water quality and fish and wildlife habitat and recreation opportunities. The PFC looks forward to the opportunity to discuss this objection with the Forest Service. Through improvements to the EA, we believe that the IPNF can avoid another hang up like Hanna Flats.

Sincerely,

/S/Liz Johnson-Gebhardt
Co-Chair

/S/Mike Petersen
Co-Chair

Cc: Leanne Martin, Northern Regional Forester
Carl Petrick, IPNF Forest Supervisor
Dan Scaife, Coeur d'Alene River District Ranger

Honey Badger Project Objection

Panhandle Forest Collaborative

The PFC comments on the Honey Badger EA were filed on June 16, 2021. In the collaborative's comment letter, the PFC wrote:

The final environmental analysis should provide more detail regarding the effects of the project to water quality, fish and wildlife, and other affected resources. Effects determinations should be supported with quantitative data and the best available scientific information.

However, no changes were made to the EA, and a public notice announcing the start of the objections process was published in the Coeur d'Alene Press on July 20, 2021. Below we outline sections of the EA that we believe need further work to connect the dots between the data and available scientific information and the Forest Service's conclusions about the effects of the project to satisfy the requirements of the National Environmental Policy Act (NEPA). As the Forest Service is aware, NEPA was passed into law in order to give the public a voice in decisions about public resources and to ensure that agency decisions are informed by potential environmental impacts. Updating the EA for the Honey Badger Project will help demonstrate the latter.

Water quality and aquatic habitat

The water quality and aquatic habitat sections are found on pages 45-49 of the EA. The four primary 6th-level hydrologic unit code (HUC) watersheds in the project area include Sage Creek, Hayden Creek, Yellowbanks Creek, and Fernan Creek. The EA does not describe the current water quality status of these watersheds, but a review of the Idaho Department of Environmental Quality's 2018/2020 Clean Water Act (CWA) Integrated 305(b) report indicates that all four watersheds are listed for temperature impairment. Fernan Creek is listed for sediment impairment below Dry Gulch.

Table 17 (EA page 46) lists the proposed timber harvest and fuels activities for each of these watersheds. However, the EA does not provide estimates of the amount of sediment that will be generated in each of these HUCs as a result of the proposed action. It's unclear why the Forest Service did not disclose quantitative estimates of sediment production for each of the four watersheds because the agency surveyed 170 miles of roadways in the project area and used the Water Erosion Prediction Project (WEPP) to model sediment production in harvest units and from roadways. The EA simply states that approximately 363,500 pounds will be generated in all four watersheds combined, and that "there would be a short-term increase in sediment delivery, however over the long-term these activities would decrease the amount of delivered sediment" (page 48).

Ideally, the EA would disclose the estimated amount of sediment that would be generated in each of the four HUCs and then interpret the results for the reader. While only Fernan Creek below Dry Gulch is listed for sediment impairment, the CWA requires the Forest Service to maintain water quality conditions that will support designated beneficial uses such as fish.

There are spreadsheets available on the project website that include the Forest Service's WEPP results. However, these spreadsheets list results by roadway and unit. It is not possible for someone from the public to look at the numbers and figure out how to aggregate the results by watershed. Furthermore,

the Forest Service did not connect the dots for the reader by interpreting the results in the context of the requirements of the Clean Water Act.

Finally, it is important to note that the EA states that the total miles of roads within the project area would decrease due to decommissioning (EA, page 49). When reviewing Table 3, this appears to be inaccurate. If you subtract the amount of system road decommissioning (-5 miles) and non-system road decommissioning (-10 miles) from the amount of new permanent road construction (+35 miles), then the net result is an increase of 20 miles. This does not include the addition of non-system roads to the Forest Service transportation system (+50 miles). If this is in fact an oversight, then a net increase in roads may impact the Forest Service's conclusions about the effects of the project to water quality as a result of sediment.

Proposed remedy

The final EA should be updated to provide estimates of sediment for each of the four watersheds in the project area. The Forest Service should then interpret those results in the context of the requirements of the Clean Water Act. For the sake of brevity, a more detailed review of effects to water quality and aquatic habitat could be described in a specialist report as the IPNF has done with the Buckskin Saddle and Westside Projects. The agency should also check to see if the project will result in a net increase or decrease in roads and consider modeling sediment generated by trails.

Wildlife

The PFC appreciates that the Forest Service prepared a biological assessment for grizzly bear, which is the only listed species that may be present in the project area.

Effects to sensitive species were not considered in detail in the EA or the wildlife specialist report. The EA concludes only that "based on habitat requirements and/or distribution, or project design and/or implementation criteria, there would be no impact to most sensitive wildlife species associated with the Honey Badger project area. Project activities may impact other wildlife species or their habitat but would not likely contribute to a trend towards Federal listing or cause a loss of viability to the population or species" (EA, page 21). For species that are not known or expected to occur in the project area such as Townsend's big-eared bat, North American wolverine, harlequin duck, black swift, common loon, and northern bog lemming, the PFC does not expect the Forest Service to perform a detailed analysis. The agency need only to reference available information to support its claims that these species are not known or expected to occur.

In contrast, the Forest Service does have an obligation under to NEPA to take a "hard look" at sensitive species that are known or suspected to occur in the Honey Badger Project area, such as flammulated owl, black-backed woodpecker, fisher, western toad, and Coeur d'Alene salamander. The Forest Service noted that while there is one record of Coeur d'Alene salamander in Fernan Creek, there is no suitable habitat in any of the project units (Wildlife report, pages 7,8). With respect to the remainder of these species, it does not appear that the Forest Service performed a habitat analysis to determine the amount of suitable habitat in the project area that would be affected by the proposed action. While project files indicate that some on-the-ground surveys were performed to detect some of these species, neither the EA or the wildlife report disclose the amount of suitable habitat for these species in the project area and how much would be affected by the proposed action. In fact, in cases where the

proposed action might improve habitat, such as flammulated owl, there is still no discussion about the acreage of habitat that would be improved.

Proposed remedy

If the agency has not done so already, the PFC encourages the Forest Service to perform a habitat analysis for flammulated owl, black-backed woodpecker, fisher, and western toad. The final EA should be updated to include a description of the quantity of suitable habitat for each of these species in the project area and how much habitat would be affected. This information should be used to inform or draw conclusions about effects and population trends. For the sake of brevity in the EA, a more detailed analysis should be described in the wildlife report.

Wildland urban interface

One of the stated objectives of the project is “to reduce hazardous fuels within the wildland urban interface and to manage forest vegetation in these areas in an effort to reduce the risk of large wildfires.” (EA, page 6). The PFC supports this objective and agrees that there is a need to reduce the threat of fire to local residents and property owners.

According to the Forest Service, 85% of the project area is located in a wildland urban interface (WUI) area identified by Kootenai County (EA, page 6). However, the EA does not describe how Kootenai County defined its WUI. Although the Forest Service is not utilizing the Healthy Forest Restoration Act (HFRA) authorities for the approval of the Honey Badger Project, the lack of information in the EA about how the WUI was defined feels eerily familiar to the recent Hanna Flats litigation. Even if this is not a HFRA project, the issue of how the WUI is defined remains relevant because reducing fuels in the WUI is one of stated purposes of the project.

Proposed remedy

The final EA should be updated to include information about how Kootenai County defined the WUI in the Honey Badger Project area.