



P.O. Box 3583
Hayden ID 83835

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.

The plans presented appear to us to be vegetation manipulation-heavy and all other resources-light, except recreation in the Canfield Recreational Area and fire control on Canfield and along private/ forest interface (Kootenai Fuels Project). The plan argues that the large number and sheer size (some 800-1200 acres) of clear cuts and shelter wood cuts are necessary to correct tree species imbalance due to historic selective harvest, white pine blister rust, fire suppression, and although not mentioned, this part of the forest's advanced stage in its stand replacing fire cycle. However, the plan chooses to ignore other "sins" of its past in other resource management: Ohio Match Grade fills improperly drained, FRS 437 which encroaches along lower Hayden Creek, and road encroachment on North Fork Hayden Creek Road (FSR 625). The North Fork Hayden Creek Road was closed by court order because it encroaches on the North Fork Hayden Creek, but after the road was closed, remediation was never completed. Ignoring its impact demonstrates the bias in the planning. The Association is concerned the plan does not balance resource management, but rather manages the vegetation while ignoring critical watershed needs.

The Association understands that Forest Service has a great deal of work to do to re-establish healthy forest stands. The alternative is a massive stand replacing fire that neither the Forest Service nor the Association desire. However, many of these clear cuts are 20 to 30 times the size the National Forest Management Act allows without an exemption, while most of the others exceed this standard in the law. Many of the controlled burns are of equal size. Based on a watershed by watershed analysis, the Association believes there is a clear and present danger to the watershed that too much could be done too quickly, resulting in watershed impacts that will affect the tributary streams and the lake. No sequence of timing is provided for the vegetation activities. Hence the Association believes Forest Service needs to:

- 1) Schedule these cuts and burns over a 25-30 year horizon with an even spread across Hayden Lake's watersheds.
- 2) Many of these large clear cut and burn units require division into more manageable units, less intrusive on the lake's watersheds over a thirty year period.

In addition, the sheer size of many of these units is inviting additional enlargement by blow down. With the globe warming, we can expect more severe winds over the next 25-30 years, certainly not less severe.

It is our understanding that the Kootenai Fuels Project is a separate project from Honey Badger, however the footprints of this project is shown on the proposed activities map. Hence, the Association has the following comments. We understand that brush and small trees are being removed within the Forest along its boundary with private property (the actual urban interface) to help control impacts of wild fires to adjacent private land. In some areas, the removal is more broad based e.g. Canfield Area, Windy Creek Forty Acres, Mokins Bay 160 Acres, and a few others. However, after removal of brush composed nearly entirely of fire adapted root sprouting species, one can expect the brush back in 7 to 10 years. This raises two questions:

- 1) Does the Forest Service plan these activities again in 7-10 years?
- 2) Does the Forest Service plan to plant appropriate trees in these treated areas that will shade out brush as the trees overtop the brush?

If one or the other of these steps are not taken, the Kootenai Fuels solution is a superficial temporary solution at best.

The Association does not oppose opening old roadbeds and building a few miles of new road to access vegetation management projects. However, Coeur d'Alene River Ranger District, which is actually the statutory Coeur d'Alene National Forest, is still one of the most densely roaded forests in the National Forest System. Given this continuing situation, the Association believes there should be no net increase or decrease in roads as the project ends. The other issue was noted above. The road issues addressed by the plan pertain to specific vegetation management without regard to the problems of misplacement and inadequate fill drainage of haul roads. The Association views the inadequately drained Ohio Match Road (FSR 206) fills as ticking watershed time bombs. The poor siting of lower FSR 437 between the forest boundary and the Ohio Match Road (FSR 206) should be addressed by a replacement of that road section with a road branching off either Mokins Bay, McLeans Bay or Triangle 7 Roads on the southeastern flank of Hudlow Mountain. The Association is actively seeking a feasible route. Those sections of the North Fork Hayden Creek Road encroaching on the stream should be addressed before this road is again closed.

The property owners of Hayden Lake Watershed established a Watershed Improvement District which is a fee district to fund projects addressing lake and watershed issues. Preliminary discussions between the District's Board and the leadership of the Association suggest the District might be willing to cost share improvement projects that would improve the lake's watershed.

The Association is concerned about the impact of the proposed projects on Hayden Lake's view shed. Our analysis demonstrates that some clear cuts are shielded by intervening ridges. However we are concerned the view shed marked on the project design map is limited to low elevation ridges. From locations like the dike, Honeysuckle Boat Access and Beach, the Hayden Lake Country Club, the west shore in general, and the lake in general, many of the proposed clear cuts will be in plain view, especially those just south of

South Chilco Mountain. Given the recent reaction of north shore residents to a private property clear cut on the north flank of Canfield Mountain, the residents and lake users will be far more satisfied by forested views than concepts of forest health projects that they do not understand. These considerations are another argument for careful phasing of diffuse projects over a long time frame.

The recreational strategy included appears to defy conventional logic. The case made that IPNF is an urban forest and the greatest demand on the forest is recreation. Yet no substantive plan to increase opportunities in response to increasing demand is supplied for a time frame that will likely cover one, and more likely, two or three decades. The Honey Badger Project only plans to improve the Canfield Recreational Trail System and possibly add a non-motorized trails to the system. Again, the project emphasizes vegetation management, while ignoring the public's demands on their public lands.

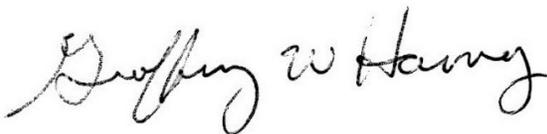
For its part the Association does not oppose additions of trails on Hayden Lake side of ridge as long as motorized use is excluded allowing only hiking, horseback riding and mountain biking. The Association has noise concerns and erosion concerns with motorized use on these steep slopes. The motorized part of the Canfield System is currently located where it is because it has virtually no impact on water quality on the Nettleton Gulch side.

The Association provided a very definitive position on the Hayden Creek shooting pit. If this use is to be continued, it must be better regulated. If shooting groups want this use maintained, it is necessary for those groups to step up and manage the site under a challenge cost share agreement like other groups managing special uses on the Forest. Lead in its intended use under RCRA occurs on the site. More critically the past shooting of home appliances and electronics has likely contaminated the pit with hazardous materials regulated under CERCLA (Superfund). These issues should deeply concern the Association and should deeply concern the Forest Service as the likely responsible party.

The Hayden Lake Watershed Association is in constant contact with its membership dealing with their lake and watershed issues. The Association works to educate the public through its website and other public awareness campaigns. The Association speaks to and lobbies leaders on all levels of government and speaks with a loud voice to the Watershed Improvement District that it put in place and for which it won public funding. We would welcome partnership with the Forest Service to educate the public on management actions in the watershed. However, The Association must be convinced the Honey-Badger Plan allows for balanced resource management over realistic time frames in that part of our lake's watershed that the Forest Service manages.

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

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