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320 West Main Street, Grangeville, ID 83530

## BOARD OF IDAHO COUNTY COMMISSIONERS

January 6, 2020

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

RE: Hungry Ridge Restoration Project

To: Objection Reviewing Officer

Idaho County previously submitted written comments as defined by 36CFR218.2. Comments were dated April 17, 2018.

We have since reviewed the Final EIS and draft ROD issued November 13, 2019 which identified the selected alternative as Alternative 2, Modified.

Our review finds that our comments from April 17, 2018, with the exception of Invasive Plants/Noxious Weeds, were considered and incorporated where feasible. The following is our objection to the selected alternative.

### Objection #1-Invasive Species

Idaho County commented that the Hungry Ridge DEIS did not disclose the process or data that generated the analyses that concluded a 0.1 to 5 percent risk of spread of invasive species by the preferred alternative. The November 13, 2019 draft Record of Decision and the November FEIS confirms that there is a fundamental flaw with the invasive species risk to spread model and/or how the Nez Perce Clearwater NF analyzes the results of the model.

### Suggested Remedy

As stated in previous comments provided, the Forest should:

- Work closely and cooperatively with partners.
- Utilize the most current risk to spread models available through the University of Idaho.
- Define what is an acceptable level of spread by species under each category of risk e.g. Extreme, High, Moderate, Low.
- Analyze all high priority weed species as defined by Cooperative Weed Management Area.

- Complete adequate ground truthing of current conditions to verify data used as part of the analysis by utilizing other crews like the botany crew who conduct surveys prior to analysis.
- Implement new mitigation measures that requires inspecting and cleaning of equipment within the project sites and minimize or consolidate ground disturbing activities.

Idaho County needs to be kept informed of any changes proposed to Alternative 2, Modified. We would review our options at that time.

Sincerely,



R. Skipper Brandt, Chairman



Mark Frei



Denis B. Duman

**BOARD OF COUNTY COMMISSIONERS**  
IDAHO COUNTY COURTHOUSE RM. 5  
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