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Document Title: Hungry Ridge Restoration Project

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Cheryl F. Probert, Forest Supervisor
Nez Perce-Clearwater National Forests
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Dear Supervisor Probert,

As concerned students of the University of Arizona's Natural Resources Policy and Law course, we are writing to express our collective thoughts regarding the Hungry Ridge Restoration Project, as outlined in the March 2023 Draft Supplemental Environmental Impact Statement (Draft SEIS) prepared by the U.S. Department of Agriculture Forest Service. Our group has reviewed the document and believes that while the SEIS demonstrates the need to reduce fire risks in the old growth ecosystems and the species that rely on them, we have concerns about the proposed thinning and prescribed burning efforts and their short- and long-term effects. We believe greater detail is necessary regarding the possible effects of forest thinning and prescribed burns on the watershed, endangered species, and human health and safety in the project area, and we respectfully request your attention and consideration to the matters we raise.

The regeneration harvest will, in the words of the EIS, "reset the size class to 0-4.9". This level of removal destroys old growth habitat, as noted in the alternatives, and appears to be enacted in response to disease or pathogen infestation. However, the acreage covered by this treatment in the alternatives is significantly larger than that designated for intermediate harvest. If this is necessary for pathogen control, we would like to see evidence of this extensive damage to warrant large-scale removal. If, on the other hand, the proposed regeneration harvest is intended for fire mitigation, it is an excessive and outdated method that may even increase fire risk in the short-term as harvest operations increase surface fuel load (Cansler, *et al.* 2022).

The intermediate harvest, intended to leave at least partial old growth functionality, could be applied to more acres in place of the regeneration harvest. While the proposed alternatives are compliant with Idaho Forest Practices, compliance is the bare minimum. The purpose of this action, as stated in the EIS itself, is to improve resilience, restore natural disturbance patterns, and reduce risk to private holdings. Timber harvest is secondary to the well-being of the targeted area, and the EIS should reflect this.

The EIS also fails to adequately consider the potential for a crown fire to occur during the prescribed burns. The agency's analysis suggests that crown fires are unlikely to occur due to the low density of vegetation in the area, but recent research has shown that crown fires can occur even in areas with low vegetation density. The agency's analysis only mentions that a contingency plan will be in place to prevent a crown fire, but it does not provide details on the specific strategies that will be employed to prevent a crown fire. We recommend that the agency revise the EIS to include a more thorough analysis of the potential for a crown fire to occur during the prescribed burns and the management strategies that will be employed to prevent a crown fire.

Finally, this Draft SEIS also lacks adequate information regarding aquatic and terrestrial wildlife species of concern. The Nez Perce-Clearwater National Forest provides important habitat for over 360 species. Chinook Salmon, Pacific Lamprey, and Coeur d'Alene Salamander, are just a few of the federally listed aquatic species of concern within the project area (USDA Forest Service, 2007). Land management logging activities that remove or alter stream and riparian cover, elevate stream sediment deposition, and fragment habitat with tree harvests and road crossings pose a threat to these species. Therefore, the EIS should incorporate information regarding both aquatic and terrestrial wildlife that depend on old growth habitats, and clarify how the proposed action takes into consideration the impacts on wildlife.

To address our concerns regarding regeneration harvest, crown fires, and wildlife safety, we recommend conducting population monitoring for indicator species as a baseline for the Final Supplemental Environmental Impact Statement. Gathering information on a forest-wide scale to create the next Forest Plan, rather than just the project area, ensures a comprehensive evaluation on the effects of logging and prescribed burns for the entire National Forest.

We thank you for your consideration of our concerns and believe the agency's ultimate goal of preserving the ecological integrity of the Nez-Perce Clearwater National Forest will benefit from addressing these issues.

Sincerely,
Tyler DePew, Khali Nelson, Woods Nystedt, Helen Waltz

References:

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