



VIA Link: <https://cara.fs2c.usda.gov/Public/CommentInput?project=43661>

October 13, 2023

Reviewing Officer
Northern Regional Office
Attn: Hungry Ridge Restoration Project
26 Fort Missoula Road
Missoula, MT 59804

Dear Reviewing Officer:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide a letter of support for the Hungry Ridge Project that is currently in the Objection Period.

AFRC is a regional trade association whose purpose is to advocate for sustained-yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies, and decisions regarding access to and management of public forest lands and protection of all forest lands. Many of our members have their operations in communities within and adjacent to the Nez Perce-Clearwater National Forest and management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

AFRC is not writing to object to this Project, rather we are writing to support the implementation of Alternative 2 modified. For history, in June 2022, the FEIS for the Hungry Ridge Project was remanded back to the Forest for a better analysis and computation of existing old growth. AFRC provided comments on the Supplemental EIS, which were submitted on April 24, 2023.

AFRC supports the Project for the following reasons:

Existing Conditions and Need For Management

The overall purpose is to: improve forest health; reduce potential risk to private property; maintain and improve wildlife habitat; and improve watershed conditions. Timber outputs will be used to offset treatment costs and support economic structure. Current and future conditions in the Project Area resulting from taking no action (Alternative 1) would result in a potential for higher risk of loss of old-growth habitat to large-scale wildland fires and insect and disease outbreaks. This potential is a function of high fuel loads in the understory in the absence of treatment. Long-term losses of old growth would result from mortality attributed to increased fire intensity exacerbated by high levels of fuels accumulation. The potential for crown fires is high because of ladder fuels. As fuels increase, particularly those that create a ladder between the ground and live tree canopies, the risk of a lethal crown fire increases.

Further emphasizing the need for management in this area was the recent announcement by the Secretary of Agriculture that expanded efforts to reduce wildfire risk across the western United States. As part of Expanding Efforts to Deliver on the Wildfire Crisis Strategy, the 1.8-million-acre Nez Perce-Clearwater Lower Salmon Priority Landscape was identified as a key landscape on the Nez Perce-Clearwater National Forest. The priority landscapes were selected based on the potential for wildfire to affect nearby communities, critical infrastructure, public water sources and Tribal lands. High-Risk Priority Fireheds in this Priority Landscape associated with the Hungry Ridge Project include Asbestos Point, Cable Car Crossing, and White Bird. The Hungry Ridge Restoration Project area falls entirely within the Nez Perce-Clearwater Lower Salmon Priority Landscape identified by Secretary Vilsack and would contribute towards forest resilience and community protection.

AFRC Supports Alternative 2 Modified and Forest Plan Amendment

To treat areas with insect and disease concerns or dead and dying trees, all action alternatives would treat stands containing old growth characteristics, as defined by the Forest Plan. **All three action alternatives of the Hungry Ridge FEIS require a project-specific forest plan amendment for mechanical treatment in old growth stands through timber harvest in Management Area 20.** AFRC supports the District using intermediate harvests in 94 acres of old growth (Management Area 20) to reduce the threat of insects and disease and wildfire.

The Forest Plan Amendment is needed because the risk of stand replacing wildfire has increased and the risk of losing the old-growth characteristics in Management Area 20 is intended to protect has also increased. Removing a portion of the understory coupled with application of periodic prescribed fire would increase the Forest's ability to maintain desired old-growth characteristics over time.

AFRC supports the Proposed Forest Plan Amendment: *"This project would be exempt from Management Area 20, Standard, Timber #2, thus allowing timber harvest in Management Area 20 to improve and maintain the long-term sustainability of the ponderosa pine and western larch early seral communities in the Hungry Ridge project area."*

- Alternative 2 modified proposes harvest on up to 94 acres of Management Area 20, and less than 1 acre of pre-commercial thinning.

The positive effects of managing these areas extend to old ponderosa pine dominated stands that are stressed and in competition with the shade tolerant understory. The intent of the treatment in these areas is to restore the open-canopied old growth fire adapted species composition that was once prevalent in this area as a result of high frequency, low intensity fire activity. Regeneration harvest prescriptions would be in old-growth areas where root disease is concentrated, in areas at risk from insects, and/or areas suitable for restoration of early seral species. In any regeneration harvest, the largest, healthiest early seral species would be retained in the stand to meet multiple resource objectives including but not limited to wildlife habitat, coarse woody debris recruitment, future seed source, and visual-quality objectives.

One of the most important aspects of using intermediate harvest treatments in the old growth ponderosa pine/Douglas-fir is the reduced risk of stand replacing wildfire associated with reduced tree densities and ladder fuels. By increasing tree spacing in the old growth and thinning out the smaller diameter, shade tolerant ingrowth, which can carry fire into the crowns of larger trees, the chance of losing these old growth areas to wildfire are reduced.

Old Growth Inventory and Validation

The Hungry Ridge Draft SEIS was prepared to further evaluate old growth and cumulative effects to old growth under the National Forest Management Act and the National Environmental Policy Act. AFRC believes the Draft SEIS adequately presented the old growth verification and old growth cumulative effects analysis in a manner consistent with the court's order. The Draft SEIS supplements the effects to old growth documented in the Hungry Ridge Restoration Project Final Environmental Impact Statement alternatives, as presented in September 2020. The findings in the SEIS are based on the thorough application of the science currently available to the Project ID team.

Validation of Forest Plan management areas, including Management Area 20 (managed for old growth habitat for dependent species) was accomplished following the direction provided in the Forest Plan for validating management areas. As part of this process, the interdisciplinary team reviewed previous project management validation efforts. There are six Old Growth Analysis Areas (OGAA's) in the Hungry Ridge Project area. Five OGAA's include lands outside of the project area. Past stand exams, and stand exams conducted in 2022 and 2023 were used to verify old growth types within the OGAA's. Other data used for this analysis came from aerial photography and Field Sampled Vegetation (FSVEG). **The North Idaho Old Growth (NIOG) definition (Green et al. 1992) was not considered when assessing old growth**, consistent with the court's decision in *Friends of the Clearwater v. Probert*, No. 3:21-CV-00189-CWD, 2022 WL 2291246 (D. Idaho June 24, 2022). The management area validation process identified approximately 2,579 acres of Management Area 20 and 5,124 acres in the Old Growth Analysis Areas in the Hungry Ridge Project area.

The Forest Plan indicates that “in order to maintain a viable population of old-growth-dependent species, it is necessary to maintain 10 percent of the total forested acres as old growth with no less than 5 percent of the forested acres maintained as old growth within each prescription watershed (old growth analysis areas, OGAA) or combination of watersheds totaling 5,000 to 10,000 acres. An additional 5 percent of the forested acres within each prescription watershed shall be designated as replacement old growth.” The areas identified as old growth may be contained within different Forest Plan management areas.

- There are 5,124 acres in the Old Growth Analysis Area, which serves as the prescription watershed. The analysis process described in the SEIS determined that all six OGAA have greater than 5 percent existing Forest Plan Old Growth (FPOG), ranging from 6 to 9 percent. When ROG is added, each OGAA has more than 10 percent old growth, ranging from 17 to 28 percent. Across the six OGAA, approximately 3,776 acres meet the FPOG definition, 8,016 acres meet the ROG definition for a total of approximately 11,792 acres. The existing condition, in each OGAA, meets Forest Plan Appendix N, minimum requirements for amount and distribution of old growth.
- The most recent Forest Inventory and Analysis (FIA) data indicate that approximately 22.5 percent of the Nez Perce National Forest meets the Forest Plan definition of old growth (minimum of 15 trees per acre greater than 21 inches diameter breast height (dbh)) (90 percent confidence interval: 19.7 – 25.4 percent). The analysis in the SEIS also shows that approximately 14.7 percent of the Nez Perce National Forest meets the Forest Plan definition of old growth (minimum of 15 trees per acre greater than 21 inches dbh, and vertical structure) (90 percent confidence interval: 12.4 – 17.0 percent). Based on this information, the Nez Perce National Forest is above the Forest Plan minimum standard of 10 percent old growth forest wide.

Table 4 from the SEIS below outlines the remaining old growth percentages following implementation of Alternative 2.

Table 4. Old Growth remaining after Alternative 2 treatments

| Old Growth Analysis Area (OGAA) | 3050102 | 3050110 | 3050112 | 3050115 | 3050116 | 3050118 |
|--|------------|------------|------------|------------|------------|------------|
| OGAA total size (NFS lands only) | 6519 | 9981 | 13028 | 7282 | 10303 | 6779 |
| OGAA forested acres | 6008 | 9397 | 12535 | 6911 | 9661 | 6302 |
| Forest Plan Old Growth (FPOG) ¹ | 428 | 561 | 729 | 461 | 845 | 344 |
| Percent FPOG per OGAA | 7% | 6% | 6% | 7% | 9% | 6% |
| Replacement Old Growth (ROG) | 614 | 1613 | 1885 | 1084 | 1869 | 637 |
| Percent ROG per OGAA | 10% | 17% | 15% | 16% | 19% | 10% |
| Total OG in OGAA | 1042 | 2174 | 2613 | 1545 | 2714 | 981 |
| Total % OG per OGAA | 17% | 23% | 21% | 22% | 28% | 16% |

This chart shows that with implementation of Alternative 2 modified the threshold for both Forest Plan Old Growth and Replacement Old Growth would still be met following harvest.

Stand Conditions Support Management in MA 20 Areas

Forest Plan Management Area 20 are those areas that are to be managed as old growth habitat for old growth-dependent wildlife species. Wildlife species that depend on old growth habitat have been identified as Fisher, Flammulated Owl, White-headed Woodpecker, Northern Goshawk, Pileated Woodpecker and American Marten.

Root disease has been identified as one of the most damaging forest diseases in the country and contributes to stand volume losses through mortality and reduced growth, and increased susceptibility to insects. It can also threaten public and firefighter safety in the form of hazard trees along roads and near recreation sites. Evidence of root disease was identified throughout treatment units, including conks of known root disease, butt swelling and pockets of dead and dying trees. Windthrown trees were also observed in stands, often near the pockets of dead and dying trees which is likely a result of root disease.

Certain old-growth stands may be at a high risk of high intensity wildfire and insect and disease outbreaks in the absence of treatment due to presence of unnaturally dense understory vegetation. Past harvest and burning activities as well as natural disturbances within the project area would continue to determine how vegetation changes in the future. Present stress caused by overstocking and recent insect infestation may have already weakened trees to make them less resistant to the injuries incurred from wildfire. As a result, losses of old growth due to wildfire would likely be high with the No Action Alternative.

No Cumulative Effects in Conjunction with the End of the World Project

Foreseeable activities that may have the potential to affect Forest Plan Appendix N old growth or Management Area 20 within the analysis area are analyzed in the End of the World Project. Only one old growth analysis area, OGAA03050116, is shared between the End of the World and Hungry Ridge Projects. This is the only area that could potentially have cumulative effects on old growth between the two projects.

- Regeneration harvest: The End of the World Project does not propose any regeneration harvest in OGAA03050116. There are no cumulative effects from the End of the World Project on FPOG or ROG from regeneration harvest prescriptions in OGAA03050116.
- Intermediate Harvest: The End of the World and the Hungry Ridge Projects have 73 acres of proposed intermediate treatment in replacement old growth in OGAA03050116. Intermediate treatments would leave snag, green tree retention, structural diversity and large diameter trees in those units which will maintain the old growth characteristics. Therefore, there are no cumulative effects of intermediate treatments in ROG between the two projects.
- Prescribed Burning: There is no proposed prescribed burning from the End of the World Project in OGAA03050116 therefore there would be no cumulative effect to old growth or MA 20 from prescribed burning.
- Management Area 20: There are no vegetation treatments within MA20 in the End of the World Project, therefore there are no cumulative impacts to MA20 between the End of the World and Hungry Ridge Projects.

- Roads in Management Area 20 – The End of the World Project’s no action alternative has 0.82 miles of existing road overlapping with Management Area 20. Alternative B would require road maintenance on the 0.82 miles of existing road within Management Area 20 which could increase noise and traffic in the immediate vicinity. The Hungry Ridge Project would not be using this section of road. The effect would be the same as the effect to roads in FPOG and ROG above.
- Roads in FPOG/ROG – There are 1.2 miles of existing road in replacement old growth within the shared OGAA (OGAA03050116) proposed by the End of the World Project. The use of this road could increase noise and traffic in the immediate vicinity. The Hungry Ridge Project would not be using this section of road, therefore there would be no cumulative impacts.

Cumulative Effects Conclusion

Although the Hungry Ridge Project would reduce the amount of FPOG/ROG with its proposed activities, there will be no cumulative impacts with other past, present, or future foreseeable actions such as the End of the World Project.

Thank you for the opportunity to provide a letter of support for the Hungry Ridge Project. We look forward to its quick implementation.

Sincerely,

A handwritten signature in dark ink, appearing to read "Tom Partin", with a stylized, flowing script.

Tom Partin
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