

**March 21st, 2023**

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**Environment and Natural Resources 2**  
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**U.S. Environmental Protection Agency**  
**EPA Docket Center, Office of Water Docket, Mail Code 28221T**  
**1200 Pennsylvania Avenue NW**  
**Washington, D.C. 20460**

To whom it may concern,

We are students from the University of Arizona attending a Natural Resources Policy and Law course. Our group has examined the environmental impacts associated with the execution of prescribed burns for the Hungry Ridge Restoration Project, and would like to make our comments and concerns known.

We understand that prescribed burns are a necessity in controlling wildfires. However, the EIS for this project fails to take into consideration the possibility of prescribed burns becoming uncontrolled, as well as the possible impact of prescribed burns on vulnerable, but unlisted, species in the area.

The Calf Canyon fire in New Mexico during the summer of 2022, for example, was started by a prescribed burn that lost control due to “unexpected erratic winds”. This fire burned 341,735 acres from April 6th to August 21st, becoming the largest wildfire in New Mexico State History<sup>1</sup>. In addition, the western United States has faced an increase in large wildfires throughout the last few decades<sup>2</sup>. Wildfire damages are extremely costly, dangerous, and can have severe negative impacts on certain ecosystems. Prescribed burns can and have resulted in devastating wildfires, making it a possible environmental impact. As part of the West, we believe the residents of Idaho need to be aware of impacts from uncontrolled prescribed burns. The information about site-specific impacts incurred from such an instance is inadequate, and needs to be addressed and provided. In addition, protocols for mitigation of a prescribed burn leading to a wildfire should be provided.

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<sup>1</sup> United States Government Incident Information. (2023, March 26). *Single incident information*. InciWeb. Retrieved March 26, 2023, from <https://inciweb.nwcg.gov/incident-information/nmsnf-calf-canyon>

<sup>2</sup> US Department of Commerce. (n.d.). *Wildfire climate connection*. National Oceanic and Atmospheric Administration. Retrieved March 26, 2023, from <https://www.noaa.gov/noaa-wildfire/wildfire-climate-connection#:~:text=Climate%20change%2C%20including%20increased%20heat,during%20the%20last%20two%20decades.>

The proposed plan addresses avian species dependent on old growth forest habitat but provides minimal protection for these species. Timber harvests are described as restoring open canopy through removing younger tree species to strengthen growth of the ponderosa pine, douglas-fir, and grand fir. While long-term sustainability focuses on tree species health, loss of habitat in the treatment process would be detrimental for declining species present in the Nez Perce Clearwater National Forest including the flammulated owl. The flammulated owl's greatest threat is habitat loss, which often occurs during timber harvest. Timber harvesting destroys the dead and dying trees and nesting cavities that flammulated owls rely on<sup>3</sup>. The proposed harvest treatment does not adequately address population impacts on species that require dense old-growth forest habitat, like the flammulated owl. We want to express concern for the potential negative impacts to an already declining species of the West.

Overall we feel that the proposed action should not be accepted in its current state. As of now, the action poses major risks to vulnerable species and has the potential to lead to uncontrolled prescribed burns. In order to address the potential impacts on vulnerable species reliant on the old-growth forests of the Salmon River Ranger District, we propose that surveys be carried out in the area to determine population metrics for various species across the forests. These population metrics should be used to designate habitat zones for avian species such as the flammulated owl. We request that these areas are not included in the Hungry Ridge Restoration Plan so that avian species can continue to inhabit the forests without disruption from timber harvests and prescribed burning. We also request that an emergency restoration plan be established for use in the case of a wildfire resulting from an uncontrolled prescribed burn.

Sincerely,

Maya Tainatongo, Celeste Browne, Jackie Kruzich, and Audrey Manning

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<sup>3</sup> "Flammulated Owl." *American Bird Conservancy*, 17 Jan. 2019, <https://abcbirds.org/bird/flammulated-owl/>.