



687 W Canfield Ave Ste 100

Coeur d'Alene, ID 83815

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April 18, 2023

Salmon River Ranger District  
Attn: Jeff Shinn, District Ranger and Jennie Fischer, ID Team Leader  
304 Slate Creek Road  
White Bird, Idaho 83544

**Subject: Hungry Ridge Restoration Project – Draft SEIS**

Dear District Ranger Shinn and Ms. Fischer:

On behalf of Idaho Forest Group (IFG), thank you for the opportunity to provide additional comment on the Draft Supplemental Environmental Impact Statement (SEIS) for the Hungry Ridge Restoration Project. IFG is a longtime supporter of the Nez Perce-Clearwater National Forests timber program and appreciate the contributions it has made to the economy and quality of life in surrounding communities. IFG has specific knowledge of this project as an intervenor on behalf of the defendant in Case No. 3:21-CV-00189-CWD Friends of the Clearwater v. Cheryl Probert. IFG is the purchaser of the Run of the Mill timber sale within the Hungry Ridge Restoration Project area, which has been enjoined and thereby delayed for over a year because of the aforementioned lawsuit. The timber volume from the Run of the Mill sale directly supports our sawmill in nearby Grangeville, Idaho representing roughly 20-25% of the annual log deliveries necessary to maintain operations. The mill in Grangeville has 198 employees and supports roughly 315 local contractors and service providers.

The Draft SEIS for Hungry Ridge was prepared to further evaluate old growth and cumulative effects to old growth under National Forest Management Act and National Environmental Policy Act consistent with Case No. 3:21-CV-00189-CWD Memorandum and Decision Order (June 24, 2022). The court in that case ordered the Record of Decision and the Final Environmental Impact Statement for Hungry Ridge Restoration project to be remanded back to the Forest for further evaluation under the NFMA and NEPA consistent with this decision. The Draft SEIS presents the old growth verification and old growth cumulative effects analysis referred to in the court case.

Validation of Forest Plan management areas, including Management Area 20 (manage 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.**

**Old Growth Forest Plan Standards That Must Be Met**

**1. Old Growth Habitats – Appendix N**

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



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(old growth analysis areas, OGAA's) 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.

## 2. Forest Plan Management Area 20

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.

### Existing Conditions

**Project Area** –There are 5,124 acres in the Old Growth Analysis Areas. All six OGAA's have greater than 5 percent existing 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's, 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, exceeds Forest Plan Appendix N, minimum requirements for amount and distribution of old growth.**

**Forest Wide**–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 data also shows 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 exceeds the Forest Plan minimum standard of 10 percent old growth forest wide.**

### Decision Framework

The Draft SEIS states that the Decision Framework requires the Forest Supervisor to decide the following:

1. *Whether direct, indirect, and cumulative effects on old growth in the Hungry Ridge Restoration project area meet the requirements of Appendix N, of the Nez Perce National Forest Land and Resource Management Plan (Forest Plan)?*

The existing conditions for both the Project Area and Forest Wide meet or greatly exceed the requirements of Appendix N of the Forest Plan as shown in Table 2 of the Draft SEIS.



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Figure 1. Table 2 from Draft SEIS.

Old Growth Analysis Area (OGAA)	03050102	03050110	03050112	03050115	03050116	03050118	Total
OGAA total acres (NFS lands only)	6,519	9,981	13,028	7,282	10,303	6,779	53,892
<b>Forested Acres in OGAA</b>	<b>6,008</b>	<b>9,397</b>	<b>12,535</b>	<b>6,911</b>	<b>9,661</b>	<b>6,302</b>	<b>50,814</b>
Acres of Forest Plan Old Growth (FPOG) <sup>1</sup>	429	719	881	482	887	378	3,776
<b>Percent FPOG<sup>3</sup></b>	<b>7%</b>	<b>8%</b>	<b>7%</b>	<b>7%</b>	<b>9%</b>	<b>6%</b>	<b>7%</b>
Acres of Replacement Old Growth (ROG) <sup>2</sup>	614	1,618	2,150	1,127	1,869	638	8,016
<b>Percent ROG<sup>3</sup></b>	<b>10%</b>	<b>17%</b>	<b>17%</b>	<b>16%</b>	<b>19%</b>	<b>10%</b>	<b>16%</b>
Total Acres Old Growth	1,043	2,337	3,031	1,609	2,756	1,016	11,792
<b>Total Percent Old Growth<sup>3</sup></b>	<b>17%</b>	<b>25%</b>	<b>24%</b>	<b>23%</b>	<b>28%</b>	<b>16%</b>	<b>23%</b>

<sup>1</sup>Stands that meet FPOG definitions, Forest Plan Appendix N.

<sup>2</sup>Total acres of ROG.

<sup>3</sup>Percent of forested acres.

Proposed harvest in OGAA 3050102, 3050116 and 3050118 result in no percent change in the amount of FPOG, ROG, or total old growth percent, in any action alternative. Proposed harvest in OGAA 3050100, 3050112 and 3050115 result in less than a three percent change in the amount of FPOG, ROG, or total old growth percent, in any action alternative, which is still well above the minimum Forest Plan requirements.

Furthermore, the proposed harvest and subsequent prescribed fire activities in OGAA is specifically designed to protect large trees and old growth stands either by removing competing vegetation that could lead to stand replacing fire or by appropriately addressing insect and disease issues through targeted silvicultural prescriptions.

2. *If there are cumulative impacts to old growth by the Hungry Ridge Restoration Project and the End of the World Restoration Project?*

The cumulative effects conclusion was very clear that though there would be a slight reduction in the amount of FPOG/ROG with proposed action alternatives, there will be no cumulative impacts with other past, present, or future foreseeable actions. Specifically, there would be no cumulative impacts in the only shared OGAA (OGAA03050116) between the Hungry Ridge and End of the World projects. Cumulatively, there is no change in the percent FPOG, ROG or total percent old growth and the action alternatives meet the Forest Plan Appendix N, minimum requirements for amount and distribution of old growth in OGAA03050116. None of the alternatives would cause the irreversible or significant impacts of resources relative to old growth and replacement old growth forest habitats. The action alternatives related to old growth are designed to reduce the chances of stand-replacing fires thereby retaining and expanding habitat for old growth dependent wildlife species. Activities associated with the Hungry Ridge project may impact some old growth habitat presently, but overall, the intent is to protect and enhance those components that wildlife species depend upon into the future. This will enhance the vegetative diversity and landscape patterns that are currently declining in quality or are lacking as a result of past human-induced activities and natural successional processes.

Cumulatively, considering past, ongoing and future foreseeable actions in Management Area 20, the standards would be met, as amended. Management Area 20 would be managed as old growth habitat for old growth-dependent wildlife species.

3. *Whether a new decision is needed to comply with the Forest Plan?*



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The additional analysis of old growth and Management Area 20 concludes that there is no additional effect or significantly different or previously unknown information that would require a new decision in order to be in compliance with the Forest Plan. Applicable standards of the Nez Perce Forest Plan associated with the management of old growth have been reviewed and are being met, and in all instances, exceeded.

4. *Whether the decision requires any Forest Plan amendments, and if so, what elements of the Forest Plan are to be amended for this project?*

All three action alternatives require a project-specific forest plan amendment for mechanical treatment in old growth habitat through timber harvest in Management Area 20. The Forest Plan Amendment is needed because the risk of stand replacing wildfire has increased and the risk of losing the old growth characteristics Management Area 20 is intended to protect. Removing a portion of the understory coupled with application of systematic prescribed fire would increase the Forests' ability to maintain desired old growth characteristics over time.

IFG 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."*

The positive effects of managing in these areas includes the fact that the northern section of the project area is comprised of some 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 because 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.

### **Summary**

IFG continues to fully support Alternative 2 and the Forest Plan Amendment for the Hungry Ridge Restoration Project. We commend the Forest for their speedy compliance with the Judge's order and we hope the additional analysis allays any concerns over a representative amount of old growth conditions across the Forest and continued high quality old growth habitat availability for wildlife that specifically depend on those unique characteristics. The additional analysis shows, without doubt, that implementation of the project meets Forest Plan requirements for old growth and will sustain or increase the amount of old growth on the landscape while improving the condition of old growth stands in both the short and long term.

It is appropriate for the Forest to adhere to the local definition of old growth in the analysis of project level treatments. We're aware that a national or "universal framework" for the definition of old growth may be released as a result of Executive Order 14072. However, it would be inappropriate and egregious to impose a new old growth definition on any existing projects, but particularly on the Hungry Ridge Restoration project given the amount of analysis, time, and effort the Forest and stakeholders have put into this project over



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more than a decade of planning.

Further, IFG fully supports the Forest's decision to request Secretary Vilsack's approval of the Emergency Action Determination on this project. This project lies within portions of three high-risk fireheds and is within the Lower Salmon Priority Firehed landscape project. The Wildfire Crisis Strategy specifically calls for immediate action within these fireheds and the Emergency Action Determination sends a clear signal of the Administrations intent to increase the pace and scale of forest management where it is necessary to mitigate the harm to life, property, or important natural or cultural resources and harvest through commercial and non-commercial means to control insects or disease and remove hazardous fuels.

Thank you for your time and consideration of our comments.

Respectfully submitted,

A handwritten signature in blue ink that reads "Tom Schultz".

Tom Schultz

Vice President of Resources and Government Affairs