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Keeping Idaho's Clearwater Basin Wild

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March 16, 2023 Cheryl Probert, Supervisor Nez Perce-Clearwater National Forests (transmitted via email to: cheryl.probert@usda.gov) Dear Ms. Probert: Friends of the Clearwater is reviewing the Draft Supplemental Environmental Impact Statement (DSEIS) for the Hungry Ridge timber sales. The DSEIS's new analysis focuses almost exclusively on the topic of old growth designated in the project area Old Growth Analysis Areas (OGAAs). The DSEIS shows the Forest Service has made significant changes to "Forest plan old growth (FPOG) and Replacement old growth (ROG)" to address compliance with the U.S. District Court's June 24, 2022 Memorandum Decision and Order and the Forest Plan for the Nez Perce National Forest. Our preliminary analysis of the DSEIS reveals a net increase of 1,871 acres of designated FPOG and a net increase of 3,572 acres of designated ROG since your original March 24, 2021 Record of Decision (ROD). Furthermore, those are net figures only; comparing a September 2020 Final EIS (FEIS) map with a newer, DSEIS map reveals that previous areas of FPOG have been deleted and FEIS ROG designations have also been changed. The Forest Service established a 45-day comment period for the DSEIS, running through April 24. The deadline date is long before most of the areas of new and changed oldgrowth designation can be accessed on the ground due to snowy conditions on roads and among the trees. Furthermore, the Forest Service is proposing to declare an "Emergency" and entirely skip the Objection process. This means the public will have no practical opportunity to ground truth the Forest Service's new old-growth designations in a timely manner. The Forest Service's claim of "Emergency" based on insects, fire risk, and disease rings especially hollow because the agency has claimed for at least the past two decades that practically every Nez Perce-Clearwater National Forests timber sale was needed because of insects, fire risk, and disease. We remind you that the federal court found that your agency deliberately misrepresented the old-growth situation in project area OGAAs, and declared your previous old-growth designations to be out of compliance with the Forest Plan. Yet you are expecting the public to trust you now, and accept your new designations without affording an opportunity for a full and fair review and evaluation of the new old-growth definitions. Please reconsider your accelerated course to implement the Hungry Ridge timber sales, and discontinue the pretense of emergency. The public needs a full summer of field review to learn and be properly informed of the details and implications of your new oldgrowth designations. The agency's previous failure to follow the law does not constitute an emergency from the public's perspective. Because of the inherent lack of transparency with such a quick turnaround, we strongly urge you to extend the comment period into the fall or withdraw the comment period and restart it in the fall, so the public can fully participate in the Supplemental EIS process established under the National Environmental Policy Act. Thank you in advance for your timely consideration. Sincerely, /s/ Jeff Juel Jeff Juel, Montana Policy Director Friends of the Clearwater 509-688-5956 jeffjuel@wildrockies.org CC: Leanne Marten, Regional Forester Randy Moore, Forest Service Chief Meryl Harrell, Deputy Under Secretary for Natural Resources