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To Whom it May Concern,

We are a group of students in a Natural Resources Policy and Law course at the University of Arizona. We have reviewed the US Forest Service proposal for the Hungry Ridge Restoration Project in the Nez Perce-Clearwater National Forests, Idaho and are taking this opportunity to express our comments and concerns on the draft SEIS. With examination and careful deliberation among our group, we determined the public was not given meaningful opportunity for comment and participation and the public comment period should be extended. Additionally, the draft SEIS does not properly consider the effects of roads on old-growth forest, causing unnecessary habitat fragmentation in the proposed project area.

Public involvement is an issue with this project and agencies must give the public meaningful opportunities to participate in decision making (EPA n.d.). Public involvement allows citizens to: increase their understanding of this proposed action; increase opportunities to offer thoughtful alternatives to achieve agency goals; and reduce unintended consequences of this proposed action. On March 10, 2023, the Forest Service opened a comment period for a supplemental environmental impact statement for a new analysis of old growth and a 45 day public comment period. However, the public cannot reasonably check to see if statements from the Forest Service are true and accurate during this comment period. This is due to winter snows preventing public access to the project area (Friends of the Clearwater 2023). The project region can see snowfall of over 5 inches throughout March and April (U.S. Climate Data 2023). Public trust in Forest Service reporting has been weakened by previous misrepresentations of old-growth in the project area, making it critical for the public to have access to this area before the comment period expires. Additionally, the Hungry Ridge project has already been involved with a lawsuit; proper public participation can offer an easier, less time consuming, and less costly way for issues to be addressed. Given this need for meaningful participation, the official comment period should be extended into the fall to allow the public to ensure that the Forest Service complies with the Nez Perce Forest Plan.

In addition to issues with public involvement, our group identified several oversights in regards to road construction in old growth stands. The draft SEIS contains unclear information regarding roads involved in the project. The map for Alternative 2 on page 23 does not show what roads are being commissioned or

decommissioned. However, in the description of Alternative 2 and in Table 9, there are lists of road building activities (pages 29-30). A map showing which roads are being commissioned or decommissioned would allow the public to have a better understanding of further changes to the project area. Another issue regarding roads mentioned in the draft SEIS is that the Forest Service states that having roads going through old growth causes damage, but then proposes building two miles of permanent roads going through old growth. Roads through forests in Rocky Mountain ecosystems create habitat fragmentation by creating edge habitat around the road (Reed et al. 1996). Furthermore, the Forest Service then goes on to state that these roads will be closed to all motorized vehicle traffic. It is therefore unclear why a permanent road needs to be built. Further clarification on this is needed and the damage that would result to the old growth must be taken into consideration. It goes against the mission of the Forest Service "...to sustain the health, diversity, and productivity of the nation's forests[hellip]" to cause habitat fragmentation unnecessarily through building these roads.

The preferred alternative chosen in this environmental impact statement is one that does not consider the weight of the importance of old-growth forests. We suggest Alternative 3 as a more appropriate choice for this area given it contains a large portion of old growth forest and this alternative will create provisions for its protection while also allowing sufficient timber harvest comparable to the preferred alternative. We call on the 1994 Environmental Impact Statement, "The Final Supplemental Environmental Impact Statement on Management of Habitat for Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl". This EIS was one of the most powerful commitments that the Forest Service and the Bureau of Land Management made to conserving old growth forests for future generations. The need to balance economic gain and sustainability for future generations. Commenting on this 1994 EIS, President Bill Clinton noted that "As we craft a plan, we need to protect the long-term health of our forests, our wildlife, and our waterways.... We hold them in trust for future generations." We believe that the current preferred alternative does not hold this spirit nor does it represent the true mission of the Forest Service. Alternative 3 saves more old growth forest, and the current alternative sacrifices more old growth to get a higher timber output for the management plan.

The initial period for public comment in the draft SEIS is not adequate for the public to give meaningful insight and participation in this project. As we examined the draft SEIS we determined the public needs adequate time to assess the statements made by the Forest Service. Furthermore, with regard to the importance of old growth forests on the productivity of natural forests and the concern about the roads involved in the project, we believe Alternative 3 is the best option in this proposal, and therefore, it should be the preferred alternative..

Sincerely,

Robin Bradley, Halley Hughes, Bryn Bowen, and Jeremiah Powers

Sources

EPA (n.d.). How Citizens Can Comment and Participate in the National Environmental Policy Act Process. <https://www.epa.gov/nepa/how-citizens-can-comment-and-participate-national-environmental-policy-act-process>.

Friends of the Clearwater (2023). Hungry Ridge and End of the World Logging Projects. <https://www.friendsoftheclearwater.org/hungry-ridge-and-end-of-the-world-logging-projects/>.

U.S. Climate Data (2023). Weather Averages Grangeville, Idaho. <https://www.usclimatedata.com/climate/grangeville/idaho/united-states/usid0098>.

Reed, R. A., Johnson-Barnard, J., & Baker, W. L. (1996). Contribution of roads to forest fragmentation in the Rocky Mountains. *Conservation Biology*, 10(4), 1098-1106. <https://doi.org/10.1046/j.1523-1739.1996.10041098>.