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First name: Erin
Last name: Olstead
Organization: The University of Arizona
Title:
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Julia Laurenzi, Erin Olstead, Kate Walker and Abby Whitley

The University of Arizona

Environment and Natural Resources 2

1064 East Lowell Street

Tucson, AZ 85721

Jennie Fischer

Project Team Leader

Nez Perce-Clearwater National Forests

104 Airport Road

Grangeville, Idaho 83530

To Whom It May Concern,

We are students at the University of Arizona, currently taking a Natural Resources Policy and Law course. We have analyzed the USDA Forest Service's Draft Supplemental Environmental Impact Statement for the Hungry Ridge Restoration Project, and we would like to present our comments and concerns. Idaho's Nez Perce-Clearwater NF is far from our current home in Tucson, Arizona, but we feel that management in National Forests is of concern to all U.S. residents, especially as it relates to stands of old growth. Old growth management has been an ongoing issue in Arizona, in regions like the Kaibab Plateau, and concerns about wildfire risk and insect infestation are as relevant here as they are in Idaho. Through clearcuts, thinning, reforestation and prescribed burning, the Nez-Perce-Clearwater National Forest wants to implement the Hungry Ridge Restoration Project under emergency action, reducing wildfire in high-risk areas.

We support Alternative 3 because it proposes the least regenerative harvest overall and importantly, 14 fewer acres in Management Area 20. We agree with the statements made about the benefit of thinning and prescribed burning for maintaining forest health. Prescribed fires have proven to be effective in reducing fuel load, controlling insect populations, and removing non-native species that may be outcompeting native ones,1 whereas

mechanical thinning is beneficial for modifying fire behavior so that the intensity is not as severe.2 When used in conjunction, these management practices can maintain or improve forest health.

Our main concern regarding Alternative 3 is specific to regeneration harvest practices. The DSEIS listed sources on page 20 that, in addition to ours, support the conclusion that both intermediate and prescribed fire can benefit forest health. However, we found that there was an absence of sources cited that supported regenerative harvesting. The finding by Hagle et al. (2016), on page 20, that any cutting in conifer stands can lead to rapid colonization by root fungus is especially concerning. This is an issue that should be addressed when recommending regenerative harvest, which includes cutting conifers.

Figure 2, on page 23 of the DSEIS, shows the proposed harvest and road work for Alternative 2. While reviewing this we noticed that there is no road work shown on the figure. However, on page 30, it is clearly stated that road work will occur under Alternative 2. Since a map of the proposed road work wasn't present, we could not evaluate differences in road work between Alternatives 2 and 3, which had very similar proposals. Since Alternatives 2 and 3 are so similar, being able to distinguish what differs between them is of importance, yet we were unable to do that because of this flaw.

In conclusion, we support Alternative 3, but we have two suggestions that we would like to see incorporated in the final SEIS. First, the final SEIS should address the issue of root disease spreading under regenerative harvest. Second, the proposed roads in Figure 2, on page 23, should be included for better understanding of the road work that will occur. Alternative 3 accomplishes the restoration goals of the project, while retaining more habitat in old growth management zones. After decades of fire suppression, the forest no longer resembles its historic condition with desirable species that are insect and disease resistant. By implementing prescribed burning and mechanical thinning, the forest can be restored to its original condition with a desired species composition. We believe the best practice is to exercise caution by cutting fewer trees in the old growth that wildlife species depend on. The removal of trees that are 150 years old or older cannot be reversed. Leaving the most intact habitat for old-growth-dependent species while also carrying out treatments for future forest health is the best path.

Sincerely,

Julia Laurenzi, Erin Olstead, Kate Walker and Abby Whitley

References:

1 Prescribed fire. US Forest Service. (n.d.). Retrieved April 4, 2023, from https://www.fs.usda.gov/managing-land/prescribed-fire

2 Thinning the forest for the trees. US Forest Service. (n.d.). Retrieved April 4, 2023, from https://www.fs.usda.gov/features/thinning-forest-trees