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Dear Jennifer:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide comments for the Draft Supplemental EIS on the Hungry Ridge Project.

AFRC is a regional trade association whose purpose is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies, and decisions regarding access to and management of public forest lands and protection of all forest lands. Many of our members have their operations in communities within and adjacent to the Nez Perce-Clearwater National Forest and management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

Project Background

For context, the Hungry Ridge project area (approximately 29,974 acres) lies within the Mill and Johns Creek watersheds, tributaries to the South Fork Clearwater River. The project area is located about 14 miles southeast of Grangeville, Idaho. AFRC supports the Purpose of the Hungry Ridge Project which is to manage forest vegetation to restore natural disturbance patterns; improve long-term resilience at the stand and landscape levels; reduce the potential risk to private property and structures; improve watershed conditions, and maintain/improve habitat structure, function and diversity and move stands toward goals and objectives stated in the Forest Plan. Timber outputs from the proposed action would be used to offset treatment costs, support the economic structure of local communities, and provide for regional and national wood product needs.

Existing Conditions and Need For Management

Current and future conditions in the Project Area resulting from taking no action (Alternative 1) would result in a potential for higher risk of loss of old growth habitat to large-scale wildland fires and insect and disease outbreaks. This potential is a function of high fuel loads in the understory in the absence of treatment. Long term losses of old growth would result from mortality attributed to increased fire intensity exacerbated by high levels of fuels accumulation. The potential for crown fires is high because of ladder fuels. As fuels increase, particularly those that create a ladder between the ground and live tree canopies, the risk of a lethal crown fire increases.

Further emphasizing the need for management in this area was the recent announcement by the Secretary of Agriculture that expanded efforts to reduce wildfire risk across the western United States. As part of Expanding Efforts to Deliver on the Wildfire Crisis Strategy the 1.8-million-acre Nez Perce-Clearwater Lower Salmon Priority Landscape was identified as a key landscape on the Nez Perce-Clearwater National Forest. The priority landscapes were selected based on the potential for wildfire to affect nearby communities, critical infrastructure, public water sources and Tribal lands. High-Risk Priority Firesheds in this Priority Landscape associated with the Hungry Ridge project include Asbestos Point, Cable Car Crossing, and White Bird. The Hungry Ridge Restoration project area falls entirely within the Nez Perce-Clearwater Lower Salmon Priority Landscape identified by Secretary Vilsack, and this project would contribute towards forest resilience and community protection.

AFRC Support Alternative 2 and Forest Plan Amendment

To treat areas with insect and disease concerns or dead and dying trees, all action alternatives would treat stands containing old growth characteristics, as defined by the Forest Plan. Information from Table 1 below displays the amount of overlap between old growth stands and proposed timber harvest by alternative and prescription type. **All three action alternatives of the Hungry Ridge FEIS require a project-specific forest plan amendment for mechanical treatment in old growth stands through timber harvest in Management Area 20.** The table below shows that Alternative 2 would commercially treat 85 acres of Management Area 20.

Indicator	Alternative 1 (No Action)	Alternative 2 (Proposed Action) (Preferred Alternative)	Alternative 3	Alternative 4
Acres of proposed timber harvest in Management Area 20, by old growth type				
Regeneration harvest	0	20	6	5
Intermediate harvest	0	65	13	13
Total harvest in MA 20	0	85	19	18
Harvest in MA 20 - FPOG				
Regeneration harvest (acres)	0	17	6	5
Intermediate harvest (acres)	0	39	10	10
Harvest in MA 20 - ROG				
Regeneration harvest (acres)	0	3	0	0
Intermediate harvest (acres)	0	26	3	3

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 has also increased. Removing a portion of the understory coupled with application of periodic prescribed fire would increase the Forests’ ability to maintain desired old growth characteristics over time.

AFRC 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.”*

- Alternative 2 proposes harvest on up to 85 acres of Management Area 20, and less than 1 acre of pre-commercial thinning.

In Forest Plan Old Growth (FROG), Alternative 2 proposed regeneration harvest on approximately 409 acres and 188 acres of intermediate harvest. In Replacement Old Growth (ROG): Alternative 2 proposed regeneration harvest on approximately 312 acres and 45 acres of intermediate harvest. Proposed harvest would result in less than a three percent change in the amount of FPOG, ROG, or total old growth percent, in Alternative 2. See Table 3 below.

Table 3. Acres of Proposed Harvest Type in Forest Plan old growth and Replacement old growth, by Alternative.

Treatment Type	FPOG ¹ (acres)	ROG (acres)	Total Old Growth (acres)
<i>Alternative 2 – Total</i>	596	358	954
Regeneration harvest	409	312	721
Intermediate harvest	188	45	233
<i>Alternative 3 - Total</i>	555	313	887
Regeneration harvest	396	308	706
Intermediate harvest	159	6	182
<i>Alternative 4 - Total</i>	563	313	895
Regeneration harvest	392	308	702
Intermediate harvest	171	6	194

The positive effects of managing these areas extends to 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 as a result 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.

Old Growth Inventory and Validation

The Draft SEIS for Hungry Ridge was prepared to further evaluate old growth and cumulative effects to old growth under the National Forest Management Act (NFMA) and National Environmental Policy Act (NEPA) consistent with *Friends of the Clearwater v. Probert et al.*, No. 3:21-cv-00189-CWD (D. Idaho June 24, 2022) (Memorandum Decision and Order). The court in that case ordered the Record of Decision and the Final Environmental Impact Statement for the Hungry Ridge Restoration Project to be remanded back to the Forest for further evaluation under NFMA and NEPA consistent with this decision.

The Draft SEIS presents the old growth verification and old growth cumulative effects analysis in a manner consistent with the court's order. The Draft SEIS supplements the effects to old growth documented in the Hungry Ridge Restoration Project Final Environmental Impact Statement alternatives, as presented in September 2020. The findings in the SEIS are based on the thorough application of the science currently available to the Project ID team.

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**, consistent with the court's decision in *Friends of the Clearwater v. Probert et al.* The management area validation process identified approximately 2,579 acres of Management Area 20 and 5,124 acres in the Old Growth Analysis Areas in the Hungry Ridge project area.

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 (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.

- There are 5,124 acres in the Old Growth Analysis Area, which serves as the prescription watershed. The analysis process described in the SEIS determined that 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, meets Forest Plan Appendix N, minimum requirements for amount and distribution of old growth.
- 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 analysis in the SEIS also shows that 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 is above the Forest Plan minimum standard of 10 percent old growth forest wide.

Table 4 from the SEIS below outlines the remaining old growth percentages following implementation of Alternative 2.

Table 4. Old Growth remaining after Alternative 2 treatments

Old Growth Analysis Area (OGAA)	3050102	3050110	3050112	3050115	3050116	3050118
OGAA total size (NFS lands only)	6519	9981	13028	7282	10303	6779
OGAA forested acres	6008	9397	12535	6911	9661	6302
Forest Plan Old Growth (FPOG) ¹	428	561	729	461	845	344
Percent FPOG per OGAA	7%	6%	6%	7%	9%	6%
Replacement Old Growth (ROG)	614	1613	1885	1084	1869	637
Percent ROG per OGAA	10%	17%	15%	16%	19%	10%
Total OG in OGAA	1042	2174	2613	1545	2714	981
Total % OG per OGAA	17%	23%	21%	22%	28%	16%

This chart shows that with implementation of Alternative 2 the threshold for both Forest Plan Old Growth and Replacement Old Growth would still be met following harvest.

Stand Conditions Support Management in MA 20 Areas

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.

Root disease has been identified as one of the most damaging forest diseases in the country and contributes to stand volume losses through mortality and reduced growth, and increased susceptibility to insects. It can also threaten public and firefighter safety in the form of hazard trees along roads and near recreation sites. Evidence of root disease was identified throughout treatment units, including conks of known root disease, butt swelling and pockets of dead and dying trees. Windthrown trees were also observed in stands, often near the pockets of dead and dying trees which is likely a result of root disease.

Certain old growth stands may be at a high risk of high intensity wildfire and insect and disease outbreaks in the absence of treatment due to presence of unnaturally dense understory vegetation. Past harvest and burning activities as well as natural disturbances within the project area would continue to determine how vegetation changes in the future. Present stress caused by overstocking and recent insect infestation may have already weakened trees to make them less resistant to the injuries incurred from wildfire. As a result, losses of old growth due to wildfire would likely be high with the No Action Alternative.

Possible Cumulative Effects with the End of the World Project

Foreseeable activities that might have the potential to affect Forest Plan Appendix N old growth or Management Area 20 within the analysis area are the End of the World Project. Only one old growth analysis area, OGAA03050116, is shared between the End of the World and Hungry Ridge projects. This is the only area that could potentially have cumulative effects on old growth between the two projects.

- Regeneration harvest: The End of the World project does not propose any regeneration harvest in OGAA03050116. There are no cumulative effects from the End of the World project on FPOG or ROG from regeneration harvest prescriptions in OGAA03050116.
- Intermediate Harvest: The End of the World and the Hungry Ridge projects have 73 acres of proposed intermediate treatment in replacement old growth in OGAA03050116. Intermediate treatments would leave snag, green tree retention, structural diversity and large diameter trees in those units which will maintain the old growth characteristics. Therefore, there are no cumulative effects of intermediate treatments in ROG between the two projects.
- Prescribed Burning: There is no proposed prescribed burning from the End of the World project in OGAA03050116 therefore there would be no cumulative effect to old growth or MA 20 from prescribed burning.
- Management Area 20: There are no vegetation treatments within MA20 in the End of the World project, therefore there are no cumulative impacts to MA20 between the End of the World and Hungry Ridge Projects.
- Roads in FPOG/ROG – There is 1.2 miles of existing road in replacement old growth within the shared OGAA (OGAA03050116) proposed by the End of the World project. The use of this road could increase noise and traffic in the immediate vicinity. The Hungry Ridge project would not be using this section of road, therefore there would be no cumulative impacts.
- Roads in Management Area 20 – The End of the World no action alternative has 0.82 miles of existing road overlapping with Management Area 20. Alternative B would

require road maintenance on the 0.82 miles of existing road within Management Area 20 which could increase noise and traffic in the immediate vicinity. The Hungry Ridge project would not be using this section of road. The effect would be the same as the effect to road in FPOG and ROG above.

Cumulative Effects Conclusion

Although the Hungry Ridge Project would reduce the amount of FPOG/ROG with its proposed activities, there will be no cumulative impacts with other past, present, or future foreseeable actions.

Emergency Action Determination

AFRC strongly supports the Forest requesting an Emergency Action Determination on the Hungry Ridge Project. Events over the past couple decades have validated that high-intensity wildfire is the most significant existential threat to our nation's forests and to the communities that surround them. Mitigation of this threat through active forest management that reduces fuels has been acknowledged by the Forest Service to be one of the only proactive responses to this threat. Consequently, the presence of high fuel levels determined by Forest Service professionals to be of a hazardous nature presents a clear emergency. The project lies within portions of three High-Risk Firesheds, and the reason for requesting this emergency authority is to mitigate the harm to life, property, or important natural or cultural resources on NFS or adjacent land; harvest (commercial or non-commercial) to control insects or disease and remove hazardous fuels.

In summary, AFRC strongly supports implementation of Alternative 2 as presented in the Hungry Ridge Draft SEIS. The Forest has done a very good job of analyzing the impacts of Alternative 2 to old growth, roads, and cumulative effects with the adjacent End of the World Project. We also support requesting an Emergency Action Determination which will allow timely implementation of this Project.

Sincerely,



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