



Karen Hardwick
Project Team Leader
Nez Perce-Clearwater
National Forests
1008 Highway 64
Kamiah, ID 83536

April 20, 2023

Subject: Twentymile Proposed Action

Dear Karen Hardwick:

I am writing on behalf of the Idaho Conservation League (ICL) to comment on the proposed action for the Twentymile Project. ICL has been protecting Idaho's environment since 1973. We represent over 35,000 members and supporters who care about Idaho's land, water, air, fish and wildlife. ICL protects these values through public education, outreach, advocacy and policy development.

As discussed in the Proposed Action, the Secretary of Agriculture announced a ten-year strategy to reduce the threat of wildfire to communities, critical infrastructure, public water sources and Tribal lands in January. The strategy identified eleven priority landscapes across the country. The Twentymile Project is located in the Lower Salmon Priority Landscape. ICL appreciates the desire and need to protect communities from wildfire. As witnessed last summer, efforts are needed to protect communities like Orogrande.

ICL encourages the Forest Service to update the Fire and Fuels analysis in order to make a more compelling case for action. While the analysis notes that 82% of the project area is susceptible to crown fire, the document does not provide estimates of changes in surface flame lengths or fireline intensity if the project were to be implemented. A comparison of these indicators under the Proposed Action and No Action Alternative is lacking despite a discussion about the importance of flame lengths and fireline intensities when it comes to fire control tactics. The document similarly lacks modeling to show projected fire spread to nearby private lands and structures under the Proposed Action and No Action Alternative. A more robust Fire and Fuels analysis is needed to show how the project contributes to the Secretary's ten-year strategy in the Lower Salmon Priority Landscape.

While it is true that the Bipartisan Infrastructure Investment Act provides the Forest Service with the opportunity to request an Emergency Situation Determination (ESD) for projects in "High Risk Firehedges", it is unclear whether an ESD is appropriate for this project. As the Forest Service is aware, ESDs exempt projects from administrative objections and require only one public comment period. Before ICL can support the approval of an ESD, the agency will have to make a more compelling argument about the urgency for action. ICL generally does not favor exempting projects from the

objection process. The objections process is an important opportunity for the public to meet with the Forest Service and try to resolve any outstanding issues before a final decision is made. In fact, we worry that exempting projects from the objections process will only invite more litigation since there will be no other recourse.

The old growth analysis could also be strengthened. While it is clear as a result of recent litigation regarding the Hungry Ridge and End of the World Projects that the Forest Service must analyze impacts to old growth as defined in the 1987 Nez Perce Forest Plan, the analysis should also analyze impacts to old growth as defined by Green et al. (2011), which is considered the best available information regarding old growth types in the Forest Service Northern Region. This is necessary because the 1987 Nez Perce Forest Plan has not been amended to incorporate the definitions of Green et al.

Finally, while the proposed changes in vehicular access to Sourdough Peak seem inconsequential from our perspective, the Forest Service really shouldn't be making isolated decisions on travel management without first completing a forest-wide travel management plan for the Nez Perce National Forest. The Designated Routes and Areas for Motor Vehicle Use Project has been on hold since 2017 despite significant work by staff to progress as far as a Draft Record of Decision, only to have the process stall out. The project is well beyond the original timeline that the Chief of the Forest Service outlined regarding the completion of travel management plans across the National Forest System several years ago, and ICL is reluctant to endorse piece-meal travel management decisions on the Nez Perce National Forest.

I would like to conclude by asking the Forest Service to engage the Clearwater Basin Collaborative in project planning for the Lower Salmon Priority Landscape. The CBC and the Nez Perce-Clearwater National Forest have not experienced the kind of collaboration that we were accustomed to prior to the pandemic. I believe that re-engaging the CBC will help increase the potential for the Forest to successfully meet the goals of the Secretary's ten-year strategy.

Sincerely,

A handwritten signature in cursive script, appearing to read "Brad Smith".

Brad Smith
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