

Data Submitted (UTC 11): 4/26/2023 5:03:42 PM

First name: Erik

Last name: Luvaas

Organization:

Title:

Comments: Hello,

I strongly oppose the proposed Twentymile EA #61355 project that would significantly harm the wildlands of Idaho. The justification for this project is unwarranted given the lack of proximity to any rural communities. The project boundaries are closer to protected wilderness areas than they are anywhere near towns that could be impacted by wildfire. The following are further justifications for opposing this project. Please do not sell our public wildlands or harvest timber in these areas which are some of the most wild and contiguous habitat corridors left in the West.

1. An Emergency Declaration is unwarranted. Labelling a standard logging project an emergency action is a misuse of government authority. Fire, insects, and disease are markers of any wild forest, not a cause for evading analysis and public participation.
2. Wildfire cannot be mitigated, controlled, or diminished by logging or thinning. In fact, larger openings can (as a secondary driver) increase fire intensity and rate of spread. This argument was used only ten air miles away, in 2019's Orogrande Community Fuels Reduction Project, in which a 200+ acre fuel break did not stop a wildfire that started west of the project in 2022 after logging was complete. More human infrastructure also increases the likelihood of human-caused ignition.
3. An Environmental Assessment (EA) is not good enough. An EIS, or Environmental Impact Study, is required to acknowledge and analyze the negative impacts of large-scale extraction projects.
4. This project accelerates the climate crisis. Intact, unlogged, mature and old-growth forests are a carbon store, one of the most cost-efficient "technologies" on Earth. Logging, including associated roadbuilding, thinning, and slash-burning pollutes our atmosphere and worsens the climate crisis. Logging is the leading carbon emitter on our national forests, far and above wildfire.
5. This project accelerates the biodiversity crisis. Protecting rare species requires both high-quality "core" habitat and well-protected "corridors" to travel between. This project knowingly degrades habitat connectivity, which is crucial for rare carnivores like lynx, wolverine, and grizzly bears. In particular, the area offers excellent habitat for fisher, a rare forest-dependent weasel that deserves protection.
6. Road use in the area has legal restrictions. Previous timber sales in part of the area (Wing Creek-Twentymile) were completed with stipulations to limit motorized use of the area. This project is to liquidate the big trees that remain. It also may be illegal under the 1978 law that established the Gospel-Hump Wilderness.
7. Fish habitat will be harmed by this proposed project. Twentymile Creek is considered a stronghold for Westslope cutthroat trout. Downstream, the South Fork of the Clearwater supports populations of other rare fish, including steelhead, bull trout, and chinook salmon.
8. Burning old-growth forests is unacceptable. Old-growth forest habitats are defined by long-term evolution outside of human management and under centuries of constant natural disturbances. Human-caused fires are not a replacement for natural cycles. Attempts to create thousands of acres of elk and deer forage at the expense of rare old-growth forest species is simply unethical. In addition, the 1987 Forest Plans for the Nez Perce-Clearwater National Forests require 10% old-growth forest wide, which almost certainly is not met.

Thank you,

Erik Luvaas, PhD