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First name: Michele

Last name: Dieterich

Organization:

Title:

Comments: Thank you for the opportunity to comment on the Twentymile project.

This timber sale is proposed for a remote area bordering the South Fork of the Clearwater and the Gospel-Hump Wilderness. The Forest Service proposes 2200 acres of logging (most of which are regeneration cuts) 7,000 acres of prescribed burning, 36 miles of road maintenance, and 10 miles of new road construction.

This project does not qualify for emergency authorization. It is 20 miles from Elk City. Rural homes that are closer are much better served by focusing on the area 100 feet from the homes and the structure itself. As Jack Cohen says, "Home ignitions are not a fuel reduction problem, they are a home ignition problem." There is little evidence that thinning large trees from the forest, road building and especially clearcutting areas protects homes or even reduces wildfires in extreme conditions.

Atchley et al 2021, demonstrates that Forest Service modelling does not take atmospheric conditions into account, nor do they consider any conditions beyond a moderate 20 mph wind. They found that removing trees and shrubs and clearcutting areas increases wind speeds by essentially removing wind breaks. Using this type of modelling to support logging is not relevant. This project will waste precious tax dollars that could be spent making homes less flammable and treating areas within 100 feet from the home. To justify an emergency authorization for this project is a violation of the public trust. Only ten miles away as the crow flies, the Forest Service created a 200-acre fuel break did not stop a fire that started near the project after the logging was complete. When the winds are strong, all bets are off, so why are we spending taxpayer dollars on more projects making empty promises to the public?

This project and its extensive use of clearcutting will affect many wildlife species including lynx and fisher. These open areas and miles of logging roads will fragment diminishing habitat that is highly necessary in a changing climate.

An EIS is warranted as it will substantially affect the human environment including endangered species, old growth, and fisheries. An Environmental Assessment is not enough to analyze this project properly.

The project will increase climate issues by reducing carbon storage and increasing emissions from cutting, transporting, and processing logs. President Biden signed an executive order 14072 to protect old growth and mature forests, yet this project plans to log and clearcut acres and acres of intact, old growth and mature forests. We are in a climate emergency. Many studies by Moomaw and Law make it clear that preserving intact, mature, and old growth forests will preserve the carbon storage on our forests and mitigate the effects of continued emissions. Logging has been found to be the leading carbon emitter, much more than wildfires.

This project fragments high-quality core habitat and migration/linkage zones for a host of wildlife. Habitat connectivity is essential to many animals including lynx, grizzly bears, fisher, and wolverine. We are in a mass extinction and biodiversity is at stake. This project will risk current biodiversity levels and further degrade much needed habitat connectivity.

Road use in the area is restricted by the Gospel-Hump Wilderness designation in 1978. And recent logging work in the area (Wing Creek-Twentymile) promised to limit road use. Now it seems this project will increase road use, remove the remaining mature trees, and create a road network close to the Wilderness.

Vital fish habitat will be harmed by this project adding sediment to streams that support Westslope cutthroat trout.

Just downstream are rare steelhead, bull trout and Chinook Salmon that will also be affected by the project.

Old growth forest habitats are defined by centuries of natural disturbances. Prescribed fires do not replace these natural cycles. Human created fires often are accompanied by mechanized and non-mechanized thinning and piling which is far from any natural disturbance and affects soils and mycorrhizal fungi. Creating ungulate forage by destroying rare old growth habitat used by hundreds of species is just not right. The Forest plan calls for 10% old growth forestwide. How does this project affect that percentage?

Please reconsider this project that is miles from human communities. This area is vital for a host of wildlife and fish communities and must be left intact.

Thanks for your time and consideration.