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First name: Brad

Last name: Smith

Organization: Idaho Conservation League

Title: North Idaho Director

Comments: Subject: Emerald Project Environmental Assessment

Dear Mr. Davis:

I am writing on behalf of the Idaho Conservation League to comment on the Emerald Project Environmental Assessment (EA). The Idaho Conservation League has been Idaho's leading voice for conservation since 1973. As Idaho's largest state-based conservation organization, we represent over 30,000 supporters, many of whom have a deep personal interest in protecting human health and the environment. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development.

Although ICL generally supports the purpose and need for the Emerald Project, we are concerned that the Forest Service underestimates the potential effects of the project to water quality. The lone action alternative includes approximately 11.8 miles of new permanent road construction, 6.9 miles of temporary road construction, 8.4 miles of road storage, 2.5 miles of road decommissioning, and the addition of 8.6 miles of non-system road to the transportation system (EA, page 4). The proposed road work also includes two new temporary stream crossings and sixteen new permanent stream crossings

(Water Resources Report, page 20). The net result is an increase of approximately 22.9 miles of permanent road being added to the system and sixteen new stream crossings.

The Forest Service estimates that the action alternative would result in a net reduction of 2.7 tons of sediment delivery per year (EA, Page 22). Given the amount of additional new roads and stream crossings associated with the action alternative, it's difficult to accept that the project will result in a net reduction in sediment delivery. After all, 6.4 miles of the new road construction would occur within 300 feet of streams (Water Resources Report, page 20). Citing Belt, O'Laughlin, & Merrill, (1992), the Forest Service notes that roads within 300 feet of stream channels are much more likely to contribute sediment to streams than roads that are more than 300 feet from stream channels.

The St. Maries River TMDL (2003) requires the Forest Service to reduce sediment loads in the watershed by 481 tons per year by 2053. Even if we assume that the Emerald Project will result in a net annual reduction of 2.7 tons of sediment delivery over the long-term, then the Forest Service still has 477.3 tons to go to meet its waste load allocation for the St. Maries Drainage within the next 33 years. We recommend scaling back the amount of proposed road construction and increasing the amount of road decommissioning to achieve water quality objectives.