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First name: Brad
Last name: Smith
Organization: Idaho Conservation League
Title: North Idaho Director
Comments: Please see uploaded comment letter.

October 8, 2023

Andrew Skowlund

District Ranger North Fork Ranger District

12740 US HWY 12 Orofino, ID 83544

Subject: Sourdough Sheep Project

Dear Andrew Skowlund: I am writing on behalf of the Idaho Conservation League (ICL) to comment on the Sourdough Sheep Project. ICL has been protecting Idaho's environment since 1973. Our mission is to create a conservation community and pragmatic, enduring solutions that protect and restore the air you breathe, the water you drink, and the land and wildlife you love. ICL represents over 26,000 members and advocates, and we protect these values through public education, outreach, advocacy and policy development.

I would like to thank you and your team for the quality of the analysis provided for the Sourdough Sheep Project. The environmental assessment and especially the specialists' reports helped me to understand the potential environmental effects of the project.

While it appears that the proposed action satisfies the requirement to cause no net increase in sediment, ICL remains concerned that existing sediment levels are well over the desired conditions outlined in Appendix K of the Clearwater Forest Plan. Indeed, there is nothing that the Forest Service can do about conditions in Lower Beaver Creek on state and private land. However, sediment levels in Upper Beaver Creek and Sourdough Creek are 338% and 186% above natural respectively!

We encourage the Forest Service to utilize the results of its GRAIP Lite analysis to identify roads that are contributing to these high levels of sediment and consider decommissioning or realigning the offending roads.

At a minimum, we request that the Forest Service drop proposed temporary roads that will require stream crossings in order to ensure that the requirement to cause no net increase in sediment is followed. Based on the maps in the Fisheries Report, it appears that there are proposed temporary roads in units T14, T22 and T23 that would require stream crossings.

This appears to be an error, but the Water Resources Report (Page 5) states that "A small amount of non-commercial hand-felling may occur within RHCAs as part of the fuel reduction treatments, primarily in the vicinity of the designated Wildland-Urban Interface (WUI)." Although there is state and private forest land nearby, the project area does not appear to be part of the wildland urban interface as there are no communities and residences in the area. If the project is located in the WUI, then the Forest Service should clarify whether the WUI designation is identified in the Clearwater County Community Wildfire Protection Plan or elsewhere.

Additionally, this appears to be the only reference to treatments in Riparian Habitat Conservation Areas, which leads us to believe that this sentence was accidentally copied from a NEPA analysis for another project. In any event, the Forest Service should either strike this sentence or clarify the situation.

Please let me know if you have any questions about my comments. Otherwise, I look forward to reviewing your decision on this project.

Sincerely, Brad Smith

North Idaho Director

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