

Ben Johnson
District Ranger
St. Joe Ranger District
222 South 7th Street, Suite 1
St. Maries, ID 83861

May 26, 2023

Subject: Lacy Lemoosh Proposed Action

Dear Ben Johnson:

We are writing on behalf of the Shoshone-Benewah Forest Health Collaborative (SBFHC) to comment on the proposed action for the Lacy Lemoosh Project. The SBFHC is a partnership of diverse local and regional interests, who have come together to work with the Federal and State forest management agencies for forest health improvement in the area and is committed to the collaborative process. Our mission is to ensure the public health, safety and welfare, and protection of Shoshone and Benewah County residents and property from wildfire through both modern vegetation management practices and science-based consideration of ecosystem components; and to promote sustainable ecosystem, economic viability, and quality of life through collaboration.

The approximately 16,100-acre Lacey Lemoosh Project Area is located within Benewah and Latah Counties and is located south of Emida. The purpose of the project is to: improve forest health and resiliency to disturbances such as wildfire, drought, insects or diseases; reduce hazardous fuels within the wildland urban interface (WUI) and other areas to lessen the severity of wildfires and to enable safe fire suppression efforts; provide economic benefit to local communities through sustainable use of natural resources and benefits for local communities; to promote good wildlife habitat; and reduce sediment delivery to streams from forest routes to maintain or improve Total Maximum Daily Load (TMDL) related water quality concerns and recover degraded aquatic habitat for native species.

To achieve these goals, the Forest Service proposes 5,400 acres of forest vegetation and fuels treatments, 25 miles of new road construction, 13 miles of temporary road construction, 22 miles of road decommissioning, and 12 miles of road storage. The agency also proposes to improve fish passage at four locations by replacing existing or undersized stream barriers.

The SBFHC appreciates the opportunity to comment on the proposed action. We found the updated information extremely helpful for our review and wish to acknowledge the diligent work done by Forest Service staff to analyze current resource conditions and develop actions to address the greatest concerns.

Forest health is a top tier issue and the focus of the SBFHC. In our view, forest health cannot be achieved without active vegetation management to address the issues of insect and disease mortality, stand overstocking, and excessive fuel loading. As SBFHC members, we support projects that are targeted to improve forest health and reduce the threat of wildfires. Forests cannot fully support the multitude of important benefits such as wildlife, water quality, recreation and community safety without first addressing forest health on a landscape level.

Our Shoshone and Benewah County communities are very dependent on the forest products industry with many jobs directly connected to logging, trucking, and milling. An even greater number of jobs like retail stores,

restaurants, fabrication shops, auto, sporting goods, health care, and schools are indirectly supported by the industry.

Through sustainable use of natural resources, our forests have significantly contributed to our local economy over the years. Active forest management helps to ensure that a viable forest products industry and workforce are maintained in our communities, both of which are critical to implement the designed management activities. We support projects like Lacy Lemoosh to help achieve needed improvements in forest health and a reduction in hazardous fuel loading.

From a wildlife perspective, the vegetation treatments within the project will provide a much-needed mosaic of early-seral habitat. The SBFHC would like to emphasize that any newly constructed roads should be effectively barriered after treatments are implemented. Illegal use of motorized roads is one of the biggest threats to wildlife security. Gates have traditionally been used to prevent illegal motorized access. However, people frequently remove and bypass gates. We recommend using front end obliteration instead of gates on any new roads unless administrative access is needed continuously. Front end obliteration will reduce the potential for illegal use of closed roads and provide the desired wildlife security.

We also support the proposed replacement of fish passage barriers. To the extent practical, the SBFHC encourages the Forest Service to limit the number of stream crossings associated with new or temporary road construction. Sediment is more likely to reach streams at crossings and impair water quality and fish habitat. Roads that are stored for future access should be stabilized to prevent the collection of run off and transport of sediment.

The SBFHC would also like to encourage the Forest Service to analyze the existing equivalent clearcut area (ECA) in the project area and the ECA that will result from the proposed action. When ECA exceeds 20%, measurable changes in the volume, timing and duration of peak run-off are possible, which could increase sediment and erosion in project-area watersheds. If the proposed action would result in an ECA greater than 20 percent, then the SBFHC recommends that the Forest Service explore the possibility of staggering proposed vegetation and fuels treatments over time. This would give the initial logging units time to recover and keep ECA below twenty percent. The SBFHC recognizes there may be practical considerations to this approach, but we would like the Forest Service to explore this possibility if ECA becomes an issue.

Finally, the collaborative encourages the Forest Service to develop a monitoring plan to track changes in fuel loads, species composition and structure, water quality, and wildlife security. There may be opportunities to partner with other Federal and State agencies to conduct monitoring, which will help inform adaptive management efforts.

The collaborative would like to conclude by thanking the Forest Service for working collaboratively with the SBFHC by meeting with us regularly, organizing a field trip, and providing numerous opportunities for input. We feel this project will greatly improve resource conditions and contribute to our local economy. The SBFHC looks forward to continued engagement in this project, and ultimately, project implementation.

Sincerely,

Members of the Shoshone Benewah Forest Health Collaborative