

June 23, 2023

Lacy Lemoosh
222 South 7th Street Ste. 1
St. Maries, Idaho 83861

To whom it may concern:

Thank you for the opportunity to comment on large openings in the proposed Lacy Lemoosh project.

Please accept these comments on behalf of the Alliance for the Wild Rockies, Paul Sieracki, Council on Wildlife and Fish, Center for Biological Diversity, Friends of the Clearwater, and Native Ecosystems Council.

An Environmental Impact Statement is necessary to analyze the impacts take a hard look at the Project's significant adverse environmental impacts to wildlife including the fisher, flammulat-

ed owl, pygmy nuthatch and other species that rely on mature trees and/or old growth for habitat and failed to provide a full and fair discussion of those impacts, which includes considering all foreseeable direct and indirect impacts, without improperly impacts.

Please consider the impact of removing significant acreage of habitat for mature and large tree dependent species and analyze impacts of the Project on the wildlife that depend on that habitat.

Please analyze the cumulative impacts of the proposed large clearcuts/openings on grizzly bears, lynx, lynx critical habitat, whitebark pine, wolverine, monarch butterflies, goshawks, and all native fish and wildlife in the St. Joe Ranger District.

Please demonstrate that the large openings/clearcuts are complying with the Forest Plan.

Please explain the project area's biophysical setting, and disclose which treatment units occur in which habitat type. Failure to analyze and determine whether the Project will meet or trend toward desired conditions for tree size, species, and biophysical settings of the Forest Plan violates NEPA.

The biophysical setting, and the size class and species composition associated with the biophysical setting are a relevant factor when considering the impact of removing the majority of large trees from the Project area. Failure to disclose and consider the biophysical setting in the Project area when determining is a failure to consider a relevant factor and important information.

Please discuss and disclose the habitat type and old growth type of the known old growth stands in the Project area. Failure to show that the timber harvest authorized in old growth stands will meet the definitions of Green et al. in violation of NFMA and NEPA.

Please discuss and disclose what metrics it used to determine old growth and potential old growth in the Project area in violation of NEPA and NFMA.

The Forest Plan prohibits timber harvest of old growth that would modify the characteristics of the stand so that it no longer meets the old growth definitions as defined in Green et al. 1992.

How will the large clearcuts/ opening effect fisher since the best available peer reviewed research finds that large clearcut openings prevent fishers from utilizing an area? Please find Sauder attached.

Please demonstrate that the the Wildland Urban Interface (WUI) that the project is using to justify the large clearcuts/openings complies with the legal definition of the under the Healthy Forest Restoration Act. (HFRA).

Please demonstrate that the large opening/clearcuts comply with the Endangered Species Act in regards to the listed species in the area such as lynx, lynx critical habtat, whit bark pine. grizzly bears, bull trout, bull trout critical habitat. Please consult with the FWS on the impact of the large clearcuts/openings on threatened and endangered species in the area such as lynx, lynx critical habitat, whit bark pine. grizzly bears, bull trout, bull trout critical habitat.

Please demonstrate that the large openings/clearcuts are in compliance with the Migratory Bird Treaty Act.

Sincerely yours,
Mike Garrity

Alliance for the Wild Rockies

P.O. Box 505

Helena, Montana 59624

406-459-5936

And on behalf of:

Sara Johnson Native Ecosystems Council

P.O. Box 125

Willow Creek, MT 59760

and for

Paul Sieracki

77 Lincoln Road

Priest River ID 83856

And for

Steve Kelly,

Council on Wildlife and Fish

P.O. Box 4641

Bozeman, MT 59772

And for

Kristine Akland

Center for Biological Diversity

P.O. Box 7274

Missoula, MT 59807

kakland@biologicaldiversity.org

And for

Jeff Juel

Forest Policy Director

Friends of the Clearwater

509-688-5956

jeffjuel@wildrockies.org

<https://www.friendsoftheclearwater.org>

