

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

September 27, 2024

Subject: Lacy Lemoosh Environmental Assessment

Dear Ben Johnson:

We are writing on behalf of the Shoshone Benewah Forest Collaborative (SBFC) to comment on the Environmental Assessment (EA) for the Lacy Lemoosh Project. The SBFC 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 science-based consideration of ecosystem components; and to promote sustainable ecosystems, economic viability, recreational opportunities, wildlife protection, wilderness, and quality of life through collaboration.

The SBFC would like to thank the Forest Service for the opportunity to continue participating in the planning process for the Lacy Lemoosh Project. As the Forest Service may recall, the SBFC formally commented on the proposed action in May 2023. That letter expressed our support for the project while also including several recommendations to which the agency was responsive.

For instance, the modified proposed action includes the decommissioning or relocation of roads and motorized trails that contribute to stream sedimentation. Motorized recreation trails that will be closed to address resource concerns will be replaced by a new OHV loop, addressing concerns about the loss of recreational opportunities.

Likewise, new road construction has been reduced to address concerns over impacts to water quality, wildlife habitat security, and the role of roads in spreading invasive weeds. Additionally, most new roads will be stored to minimize effects on wildlife while maintaining the road prisms for future forest management actions and fire protection.

The Forest Service also addressed concerns about exceeding critical watershed effects thresholds. Logging units were adjusted or removed to ensure that the equivalent clearcut area does not exceed 20% in any of the project area watersheds.

Several units will exceed 40 acres. In these units, the SBFC recommends that the Forest Service maintain patches, islands, or peninsulas to provide cover for wildlife and meet scenic integrity objectives. The treated areas will create forage for wildlife, as will units selected for aspen restoration.

In conclusion, the SBFC expresses its support for the modified proposed action, which aligns with the goals and management direction outlined in the IPNF Forest Plan. This project will significantly improve forest health, reduce fuel loads in the wildland-urban interface, provide raw materials to the local forest

products industry, and restore desirable tree species to the landscape. It will also enhance water quality, wildlife habitat, and recreational opportunities for OHV enthusiasts and Nordic skiers.

The SBFC looks forward to the final decision and the eventual implementation of the project.

Sincerely,

Members of the Shoshone Benewah Forest Collaborative