



**COEUR D'ALENE TRIBE**  
**Department of Natural Resources**

402 Anne Antelope Rd.  
P.O. BOX 408  
PLUMMER, IDAHO 83851  
(208) 686-1800 • Fax (208) 686-1182

To: Benjamin Johnson, St. Joe District Ranger, USFS

Re: Lacy Lemoosh Draft Environmental Assessment

November 8, 2024

The Coeur d'Alene Tribe is submitting comments regarding the draft Environmental Assessment for the proposed Lacy Lemoosh project in the St. Joe Ranger District in the Idaho Panhandle National Forest. The Tribe appreciates the efforts that the district has made to ensure that we are able to understand and comment on the proposed actions, and the response to our previous concerns regarding the scope and scale of timber harvest and its impact on wildlife, cultural resources, water quality and overall biodiversity, and we recognize the response by USFS to those concerns from the initial scoping to this draft EA.

We are supportive of the district's attention to wildfire resilience through prescribed burning, and applaud the proposal to broadcast burn 715 acres, as we support the restoration of fire to the landscape to the extent possible. We also appreciate the incorporation of carbon and climate impacts into the consideration of proposed treatments, and note that the preliminary report on soils documents the difficulty in forecasting long-term impacts on soil health from changes in vegetation management.

As noted in that same report, research has demonstrated clearcut harvests have a higher impact on soil carbon, and the proposed regeneration treatments will likely generate significant carbon losses. However, the report projects that long-term treatment intervals will result in a recovery of forest floor carbon based on historic trends. We wish to register our concern that this assumption does not adequately incorporate recent temperature trends that could impact soil temperatures, such as the increasing occurrence of "heat domes" that could severely impact the soil microbiome. As you are likely aware, globally, 2023 was the hottest year on record, and 2024 temperatures have significantly exceeded 2023 temperatures. In fact, since 1850, the ten hottest years on record are within the last 25 years, with five of those years occurring since 2019. As such, we believe that decisions about timber harvest should be made with the most cautious approach, instead of relying on data that is no longer the physical context for forest health. Essentially, large-scale clearing of vegetation is too great a risk to overall ecological function, particularly our lack of understanding of soil biodiversity and function in a rapidly changing climate. Additionally, we believe that reliance on historic precipitation patterns, rather than incorporation of projected changes to precipitation, in modeling hydrologic impacts undermines the projected sediment impacts, of special concern since the St. Maries drainage has been documented as a heavy contributor to the nutrient loading in Coeur d'Alene Lake (<https://www2.deq.idaho.gov/admin/LEIA/api/document/download/13087>). We strongly encourage you to eliminate any clearcuts over 40 acres in size, and instead use selective harvest

that is more likely to provide shade and protection to the forest floor, and better sediment retention.

While we note the overall reduction in road miles between scoping and the draft EA, and applaud this reduction, we do have concerns about the proposed new recreational travel loops that will have impacts both through new road construction and long-term increased recreational use. The opening of nine new miles of routes in the Tyson area can have potentially deleterious impacts on wildlife and cultural resources. We also note that approximately 25 miles of roads are proposed for decommissioning; we recommend that these actions are completed with attention to preventing the establishment of invasive species and adequate revegetation to ensure that they do not become vectors for trespass and wildfire.

We also take issue with the assertion that Lacy Lemoosh will have no adverse effects on cultural resources, as the statement that all identified cultural resources are outside the area of potential effect is wholly incorrect, and in fact adverse effects are likely to occur. Regarding cultural resource impacts, we have requested consultation, and recommend that this moves forward as quickly as possible to address our concerns.

We also note that the report has found that nearly 75% of the project area is designated mature forest, and that the proposed action would reduce this amount to 59%. Though we recognize that there is a need to address insect and disease damage on a localized scale, large-scale timber harvest that removes such a significant amount of mature trees will actually increase fire, pest, and disease susceptibility, while decreasing long-term sequestration potential. Additionally, localized mortality from endemic disease can be beneficial from a wildlife perspective, providing both standing dead habitat and regeneration areas for uneven-aged stands.

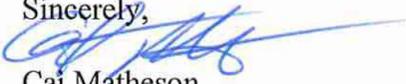
We are concerned that the cumulative effects of the proposed timber harvest are taken in respect to the entire IPNF, which mean that the impact of the proposed action is relatively small. However, we would note that the proposed 2,643-acre timber harvest takes place in the St. Joe subwatershed of the Coeur d'Alene Basin, and we assert that assessing cumulative impacts should not be done strictly across USFS lands, but within the watershed. According to Global Forest Watch, the St. Joe watershed, much of which we acknowledge is in private industrial ownership, has lost 26% of its tree cover between 2001 to 2023, including 7,000 kha in 2022 alone. The St. Joe watershed has become a net emitter of carbon, with average emissions of 428 ktCO<sub>2</sub>e/year. The cumulative effects analysis presumes that without treatment, the forest stands will become more likely to emit carbon, even while the harvest numbers propose to remove several thousand acres of mature that are more effective at carbon retention than younger age classes.

This proposed loss of tree cover also represents an existing reduction in wildlife habitat, but does provide early seral forage habitat for elk. The widespread availability of elk forage in the project area due to previous harvest eliminates seral habitat as a limiting factor and instead preservation of the remaining security cover should be prioritized. We also take issue with the definition of security cover as presented in the report, as it focuses solely on motorized access during hunting seasons. Security cover is an important habitat feature for elk throughout the year, as elk are susceptible to predation not just from human harvest, but also from predators such as wolves,

cougar, coyotes, and bears. Motorized access through security cover during non-hunting but biologically-important periods such as late winter pre-parturition can have negative impacts on individual condition, which has follow-on effects on calf survival and recruitment. The existence of roads and other linear features within designated security cover, whether open to motorized access during hunting seasons or not, have a detrimental effect on elk survival and should be avoided where possible.

In summary, while we support the significant reduction in clearcuts and road construction that were made in response to our earlier concerns, we wish to be clear that our specialist meetings that are cited in the draft EA are not understood to be full endorsement of the proposed actions laid out in the current EA. While we see positive impacts to some of the proposed prescribed burns and thinning, and we applaud the response to our recommendations regarding the need to protect elk habitat, we continue to have concerns about the scope of clearcuts and road construction, as well as lack of understanding of our cultural resource concerns. The proposed action of 2,290 acres of openings that are greater than 40 acres is likely to have long-term negative impacts on biodiversity, fire resilience, water quality, and overall ecosystem health, and we strongly encourage you to move towards treatments that are assessed at a more refined scale.

Sincerely,



Caj Matheson

Director, Natural Resources

Xc: Amy Thompson, Ecosystems Staff Officer, USFS, St. Joe Ranger District  
Laura Laumatia, Coeur d'Alene Tribe Environmental Programs Manager  
Scott Fields, Coeur d'Alene Tribe Water Resources Manager  
Ralph Allan, Coeur d'Alene Tribe Fisheries and Wildlife Program Manager