



PALOUSE DIVIDE NORDIC SKI CLUB

Lacy Lemoosh Project
St. Joe Ranger District
222 South 7th Street, Ste.1
St. Maries, ID 83861
Attn: Amy Thompson

To Whom It May Concern,

The Palouse Nordic Ski club and its members have the following objections to the Lacy Lemoosh Final EA.

On page 46 of the Final EA it states "Cross-country skiing on the Palouse Divide Nordic Ski Trails would not be affected and may possibly be improved with construction of roads 1479D and the 1479 cutoff. The construction and brushing of these roads would likely enhance cross-country ski trails." The same statement is found on page 44 of the Draft EA. This statement is substantially the only reference to the Palouse Divide Nordic Ski Area in these documents.

The club has three concerns with this statement:

1. In the EA Responses, document 20250210, page 41 there is this statement. "Need for action does not include enhancements for cross-country skiing. Enhancements were discussed but final harvest plans do not include suggested relocations for cross-country skiing. Additional new trails or relocation of trails are outside of the scope of this project." This statement indicates that there aren't any plans within the Lacy Lemoosh project to expand or enhance the trail system. Reading through the Draft and Final EA, there seems to have been considerable time and effort to change, enhance and expand the off-road vehicle trail system for motorized recreation. It is difficult from the wording of this document whether any consideration is going to be given to enhancing or expanding non-motorized recreation opportunities for one of the most supported Nordic Ski Areas in the State of Idaho. We strongly recommend that cross-country trail enhancements and expansion be within the scope of this project.
2. On page 42 of EA Responses document 20250210, the following statement is found. "Hauling is restricted on portions of Hume Creek Road and Palouse Divide Road from December 1 to March 31 because of grooming for cross-country skiing. There are no anticipated shutdowns for recreational activities." Hauling is not the only activity that has interfered with our grooming and cross-country skiing activities at the Palouse Divide Nordic Ski Area. Administrative use by USFS employees such as timber sale

preparation has also ruined a significant portion of our trails during the “restricted season”. We were told at that time the need to get the timber sale prep work done outweighed using the road and trails for skiing. We do not want to run into this conflict again. The original language addressing this in the Lacy Lemoosh Proposed Action for Scoping (April 26, 2023) stated “No project activities would be allowed from December 1 to March 31 on Palouse Divide Road 377 from junction with Hwy 6 to Bald Mountain Lookout and along Hume Creek Road 1479 from the junction with Palouse Divide Rd 377 to the Junction with Hume Ridge Road 1950. These sections of roads are closed to all motorized traffic as part of the Palouse Divide Park n’ Ski Cross Country Ski system.” We do not understand why there has been a change from this original scoping document to the EA documents. We object to the language in the EA documents and request that the language of the original scoping document be used so as to avoid future conflicts.

3. The third concern with the EA statement is, cross-country skiing will most certainly be affected by four clear cuts totaling over 500 acres either adjacent or in close proximity to The Palouse Divide Nordic Ski Area. There is discussion in the EA how these will be short-term and not long-term impacts and these impacts will be minimized by the shape of the cuts and so on. The Palouse Divide Nordic Ski Club is not opposed to clear cutting as a management tool. Several of us have degrees in forest management, have worked for the USFS or in the timber industry. We don’t even disagree that clear cutting may be the best prescription for those sites. What we object to is the size of the cut units and rapid sequencing of harvest adjacent and in close proximity to the Palouse Divide Ski Area and the Palouse Divide Lodge. These are high-use recreation areas and more consideration should be given to the visual impacts and potential adverse visual effects on skiing, hiking, biking, snowshoeing activities. The forty-acre rule was established for a reason. It is our opinion that it should be adhered to in this case for cutting units 14, 15, 16 and 17. These should be broken down into smaller units and the harvest sequence should be spread out over a longer period of time. We understand that this will increase harvest costs by reducing efficiency but, the local economic contributions of recreational users need to be factored in as well.

Another objection that we have concerns Page 16, figure 8 of the Final EA. It appears that the intent is to open up Road 1206 for harvest and management activities. This road, is part of the Palouse Divide Nordic Ski Area trail system. On our maps, it is referred to as the “Snowshoe Trail”. This trail presently winds through both USFS and private property. The trail is maintained by the Palouse Divide Nordic Ski Club. It is the only designated snowshoe trail in the area and is heavily used. There is a variety of forest types along the route and a relatively natural setting type feel for its users. People pay Park n’ Ski fees in order to use this trail. Opening up this road for harvest and management activities and clearcutting right up to the road are going to have a huge adverse effect on this recreational activity. We feel that the road should remain a “trail” and that a forested buffer be maintained between the clearcut units and trail to maintain this recreational opportunity.

Finally, in the Draft EA and the Lacy Lemoosh Proposed Action for Scoping, there is a reference to the Good Neighbor Authority potentially being used for one cutting unit. This language was left out of the Final EA as far as we can see. It has come to our attention that the Idaho Panhandle National Forest has a Good Neighbor Authority Agreement with the Idaho Department of Lands and has proposed utilizing this Authority in the Lacy Lemoosh project area. Given the IDL's recent history of not respecting the December 1 – March 31 Road Closure on the 377 Road East of Hwy. 6 and their unresponsiveness to our Club, the State Department of Parks and Recreation and Palouse Ranger District Staff regarding this matter, this is a major concern to us. We have lost nearly one half of the Palouse Divide Nordic Ski Trail system for the past two winters due to IDL activities. We understand that administrative control still lies with the USFS but given our past experience with IDL, we are not confident that our interests will be protected unless very tight controls and enforcement are put into place. We object to this omission in the Final EA.

For a little perspective of how important the Palouse Divide Nordic Ski Area is as a recreational resource, please consider the following:

1. It is the primary cross-country ski area for the approximately 500 members of the Palouse Divide Nordic Ski Club (PDNSC), which is an Idaho and U.S. Federal non-profit organization whose purpose is to promote and support cross-country trails at the Palouse Divide Nordic Ski Area.
2. The PDNSC hosts a "Free Ski Day" in early January that attracts 250 participants each year at the Divide Ski Area. The PDNSC donates free rental equipment (skis and snowshoes), provides lessons, food and beverages to individuals and families, most of whom have never had an outdoor winter recreational experience.
3. Three of the four snowmobiles presently used for grooming have been paid for by the PDNSC. The PDNSC donates the machines to the USFS but pays all maintenance and operating costs. Most of the other grooming equipment is owned and maintained by the PDNSC. The PDNSC also pays for public restroom facilities at the site during the winter season.
4. The PDNSC has an operational agreement with the USFS and Idaho Department of Parks and Recreation to maintain the trail system at the Palouse Divide Park N' Ski site.
5. The Palouse Divide Nordic Ski Area is the only Park N' Ski site between Fourth of July Pass and Fish Creek Meadow.
6. According to the Idaho Department of Parks and Recreation, the Palouse Divide Park N' Ski Area is the number one designated site for Park N' Ski passes sold in the State of Idaho.
7. The PDNSC provides teams of volunteer groomers, certified to operate snowmobiles by the USFS to maintain the trail system. Many of the groomers are also USFS chainsaw certified. PDNSC members typically groom the trail system one to three times per week during the winter, depending on conditions.
8. The PDNSC holds two trail clearing days each fall. Typically, 15-20 members walk and ride the trails clearing downfalls, brush, overhanging limbs and mowing trail surfaces prior to the start of the season.

9. The PDNSC provides free ski lessons twice per month during the winter at the Palouse Divide Ski Area. PDNSC members volunteer as instructors. There are typically 15-20 students per session.
10. Use estimates are hard to pin down as very few skiers or snowshoers sign the visitor log. By observation, at anytime during a weekend during ski season, there are typically 20-30 cars in the parking area. Weekdays are typically 3-6. Other users include guests that ski or snowshoe directly from the Palouse Divide Lodge. There can be as many as 15-20 trail users from the Palouse Divide Lodge on any given weekend.

The PDNSC has enjoyed its cooperation with the Palouse Ranger District and the Nez Perce-Clearwater National Forest. It is our hope and desire to have the same good working relationship with the St. Joe Ranger District and the Panhandle National Forest.

Sincerely,

Members of the Palouse Divide Nordic Ski Club Board of Directors

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