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Comments: The Palouse Divide Nordic Ski Club (PDNSC) and its members thank you for the opportunity to comment on the Lacy Lemoosh Project.

We are pleased that the Project authors recognize the existing Nordic Trail System and have included verbiage and maps suggesting possibilities for trail improvements. Going forward, we would like to work closely with the St. Joe National Forest and the St. Joe Ranger District on the potential re-route and improvement plan. Below are some comments for specific improvements.

First, the sections of the "Big Loop" trail identified on the map are currently problematic for grooming and skiing due to the slope and narrowness of those trail sections. Finding a better alternative to those sections would make grooming that section of trail safer for the crew to groom and for hundreds of skiers annually, most of whom have to remove their ski equipment and walk that section of trail because the trail is too steep and narrow for safe skiing.

In addition to the trail improvement mentioned in the Proposed Action for Scoping, the PDNSC believes that there are also opportunities for new trail development that should be addressed in this plan. Specifically, one potential trail expansion would be to create a Hume Creek Loop which would depart from the Hume Creek Road (1479) somewhere in S17, T43N, R2W and return to the Palouse Divide Road (377) in S20, T43N, R2W. This and other expansion opportunities should be explored at this time in a cooperative effort between PDNSC and the USFS so they can be incorporated into harvest and other management plans.

Another area of opportunity would be to "daylight" or remove standing timber adjacent to the ski trails. Most of the trails, including Hume Road and even the 377 road, have spots or sections where the limbs from adjacent trees overhang. This prevents much of the snow from hitting the trail surface, creating thin spots and then slush as the melting snow drips onto the trail, followed by ice when that snow melt freezes. We believe it would be beneficial to incorporate a harvest plan to address this. It is low volume but it is also low-tech, low-cost harvesting that may be beneficial to a small local logging operation. It is also an opportunity to create some wider fire breaks in the area.

The PDNSC is concerned that there appears to be 3 proposed harvest openings greater than 40 acres adjacent or in close proximity to the Nordic Ski Trails. It is difficult to discern from the maps exactly where the boundaries are located and what the silviculture prescription is for each of these units. It appears that the harvest method is anticipated to be skyline. There is a potential detrimental impact on the Nordic Ski experience in that area by opening up these large tracts in rapid succession. We request that consideration be given to the aesthetics and negative impact the harvest operations in this area may have on the hundreds of cross-country skiers that use the trails every winter season. We would like the opportunity to discuss with USFS personnel in further detail how the unit boundaries, silviculture practices, cut designs, and timing of sales will impact the Nordic Ski Area and its users.

The PDNSC has a long history of cooperation and partnership with the USFS. We look forward to continuing this relationship in the decades to come. We again thank you for the opportunity to comment on the Lacy Lemoosh project and believe that it has opportunities to enhance the cross-country skiing experience at the Palouse Divide with the proper planning, forethought and communication.

Sincerely,

Members of the Palouse Divide Nordic Ski Club's Board of Directors

