IDAHO CONSERVATION LEAGUE

August 4, 2026

Buddie Carroll, Palouse District Ranger
Nez Perce-Clearwater National Forest
1700 Highway 6
Potlatch, ID 83855
(208) 875-1131

Electronically submitted:
https://cara.fs2c.usda.gov/Public/CommentInput?project=370312

RE: Idaho Conservation League's Comments on the Proposed Wepah Salvage Project

Dear Mr. Carroll:

I am writing on behalf of the Idaho Conservation League (ICL) to provide our comments and recommendations on the proposed Wepah Salvage Project.

Founded in 1973, the mission of ICL is to create a conservation community and pragmatic, enduring solutions that protect and restore the air you breathe, the water you drink, and the land and wildlife you love. ICL's seven strategic initiatives include confronting climate change, recovering Idaho's wild salmon and steelhead, cleaning up the Snake River, protecting public land, restoring abundance and diversity of Idaho's wildlife, safeguarding North Idaho lakes and waters, and reducing pollution. ICL achieves these goals through public outreach and professional advocacy. With offices in Boise, McCall, Ketchum, and Sandpoint, the organization is a consistent, statewide voice for conservation in Idaho and represents more than 26,000 members and supporters. ICL's members and supporters care deeply about protecting and restoring the environment.

ICL recognizes that the Palouse Ranger District of the Nez Perce-Clearwater National Forest is highly managed, and we appreciate the opportunity to provide comments on the proposed Wepah Salvage Project. We concur with the agency's decision to create the Wepah Salvage project with a tightly constrained project boundary. Our largest concern focuses on potential sediment delivery through road maintenance, temporary

road construction and use, and ultimately temporary road decommissioning and obliteration. We appreciate the Forest Service's inclusion of numerous standards and goals that address sediment delivery and erosion control (FW-STD-ARINF-02, 03, 04, 06 and 08, FW-GDL-ARINF-01, 05, 07, and 09, and FW-STD-WLMU-01). However, we believe that minor adjustments to the commercial harvest unit and prescription plan will decrease opportunities for sediment delivery in Wepah Creek, which will also help improve conditions in the East Fork Meadow Creek.

We note that Unit 3 consists of 266 acres of regeneration cuts, whereas Unit 2, located just north of Unit 3 on the opposite side of Wepah Creek has a recommended Intermediate harvest proposed. We recommend that the Forest Service convert portions of Unit 3 that are closest to Wepah Creek to an intermediate harvest. While it may mean less timber is harvested for economic gain, the retention of more trees, either dead or alive, along Wepah Creek's south bank will provide continued shade to cool the creek waters while at the same time providing soil stabilization and filtration, trapping any sediment generated by temporary roads before it reaches Wepah Creek. We further recommend that the Forest Service require operators to erect silt fencing between timber harvest locations and temporary roads and Wepah Creek, where appropriate.

We also support the Forest Service's proposal to retain live large trees with a 15" DBH or greater and to retain 600 snags per 100 acres, as well as the commitment to retain an appropriate amount of coarse woody debris throughout the project area. This commitment will provide wildlife habitat, shade, and soil stabilization, all components of a healthy ecosystem. The design features also include a reference to FW-GDL-WLMU-02 to support large game winter habitat identified in Unit 5. The purpose of the design feature is to minimize large game disturbance between December 1 and March 15. However, this is the sole design feature focused on wildlife and seasonal restrictions. We ask that the Forest Service review species populations and location data, including wildlife surveys conducted within the past 5 years, to determine if sensitive or species of greatest conservation concern migratory birds or raptors have breeding or rearing habitat within the project area that would warrant further seasonal restrictions or avoidance measures.

Regarding the recreation improvements associated with the Wepah Salvage Project, we are generally supportive. However, we are concerned that the Forest Service is including the bridge replacement on Trail 221-A over Mannering Creek, which is well outside the project area boundary. We do not question the need to replace the bridge, but with the project component being outside the bounded project area, it has the appearance of an add-on project. There are numerous approval authorities within the Categorical Exclusion suite that sufficiently address the recreation components

associated with this project. We recommend using those authorities to approve small improvement projects outside the scope of the primary project's Purpose and Need statements.

Once again, thank you for the opportunity to comment on the proposed Wepah Salvage Project. If you have any questions about these comments or recommendations, please do not hesitate to contact us.

Respectfully submitted,



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