



**Friends of the
Clearwater**

*Preserving, Protecting and Defending the Forests,
Waterways and Wildlife in the wild heart of north
central Idaho since 1987.*

August 4, 2026

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*Submitted to jonathan.a.word@usda.gov ; and to:
<https://cara.fs2c.usda.gov/Public/CommentInput?project=370312>*

To Whom this concerns:

This letter is comments on the “Wepah Salvage Project Proposed Action for Comment” (Palouse Ranger District, Nez Perce-Clearwater National Forests), on behalf of Friends of the Clearwater (FOC), Alliance for the Wild Rockies, WildEarth Guardians, and Center for Biological Diversity. I received this Proposed Action (PA) via July 31 email when a total of four documents were posted on the Forest Service’s project website. Later that day three more were added, which are all there is today. The July 31 email that accompanied the project proposal states: “If you wish to provide substantive comments that meaningfully inform consideration of reasonably foreseeable impacts on the human environment, the resulting significance determination, decisions on how to proceed (alternatives), or compliance with applicable laws, executive orders, and regulations on this proposal, please do so by August 4, 2026.”

Four days including a weekend is wildly inadequate for interested parties to prepare “substantive comments that meaningfully inform consideration of reasonably foreseeable impacts on the human environment, the resulting significance determination, decisions on how to proceed (alternatives), or compliance with applicable laws, executive orders, and regulations.” The Forest Service (FS) is obviously not interested in collaborating with the public—the citizens who own this national forest.

The PA states, “The overall purpose of the Wepah Salvage project is to facilitate the implementation of the LMP...” FOC participated at every stage during public processes as the LMP (revised Land Management Plan, or forest plan) was being developed. We fully incorporate, as comments on this PA, all our submissions to the FS as part of the revision process. This is imperative because the FS failed to adequately reconcile our input, which identified inadequacies of the LMP NEPA documents, and failed to adequately reconcile our comments/objections which substantially call into question FS management practices and priorities. If the FS has misplaced its copy of the Planning Record including our input, feel free to let us know so we can plug your gaps in documentation.

The PA mentions two fires—Wepah and White Pine. Did both occur in the project area recently, or are there two names for the same fire? Another document renames the Wepah Salvage Project as the “Meadow Creek Salvage Project.” It seems people purporting to do analysis are not on the same page.

The PA refers to FS actions/documents:

- A post-fire assessment was conducted to determine survival and mortality of mature forest and to determine the feasibility of salvaging the value from standing dead trees.
- An evaluation conducted by the Zone Interdisciplinary Team found that vegetation and fuels conditions, transportation system and public recreation access were outside the range of desired conditions outlined in the LMP.
- The IDT and **collaborators** have identified additional resource concerns with potential impacts to watershed health and riparian function. (Emphasis added.)
- The biological assessment for this project...

Yet none of that is currently on the project website, consistent with the FS’s apparent intent to keep the public underinformed. The FS obviously is not interested in collaborating with the public—the citizens who own this national forest. Please identify these “collaborators” and explain why they have participatory opportunities not afforded to the public.

The FS is obligated to adhere to procedures relating to species listed under the Endangered Species Act, including consultation under ESA section 7. The FS placed a document on the project website that mentions species listed under the ESA, headed thus:

Wildlife Regulatory Framework and Consistency
Meadow Creek Salvage Project

This Wildlife Regulatory Framework and Consistency document begins, “The Meadow Creek Salvage Project was evaluated for consistency with the Nez Perce-Clearwater National Forest’s 2025 Land Management Plan (LMP) and other applicable regulatory direction...” The document describes no details of the Wepah Salvage project as described in the PA—it is mostly just a cut-and-paste job with text taken from the LMP.

That Wildlife Regulatory Framework and Consistency states, “Table 6 provides the conclusions for all at-risk wildlife species assessed for the Wepah Salvage project. See project record Environmental Assessment wildlife effects *and 20260730_WepahSalvageNPC_LMP_Consistency*), as well as ESA consultation documents.” But ESA consultation documents, if they exist, have been withheld from the FS’s project website. Same for the “project record Environmental Assessment wildlife effects”—it’s not available. Apparently this kind of perfunctory pretense of public involvement is now all the FS is capable of. The PA also alleges a Biological Assessment, which is also not on the project website for public review.

The PA states, “Taken together, this suite of desired conditions contributes to moving this landscape towards a more resilient ecosystem...” Please explain how the ecosystems of the NPCNF and project area, featuring natural resilience, old growth and other manifestations of native diversity, were able to develop, evolve, and maintain before the colonialist mindset Forest Service arrived to take control and make all that happen.

PA: “The scale of disturbance associated with temporary road construction is minimal and will not exceed FW-GDL-SOIL-02.” That guideline is expressed in the Forest Plan thusly: “Project activities should provide sufficient effective ground cover, such as litter, fine, and coarse wood material, or vegetation with a post-implementation target of 85 percent aerial extent of an activity area to retain soil moisture, support soil development, provide nutrients, and reduce soil erosion. The depth and distribution of organic matter should reflect the amounts that occur for the local ecological type and natural wildland fire regime.” Please explain how attainment of this quantified/numerical “target” will be assured, and how it will be verified.

PA: “(Soil) function will be maintained in accordance LMP plan components as well as federal and state laws (FEIS, pgs. 319 – 320) by using proven and effective harvest methods, contract provisions, and following Land Management Plan standards for soil management FW-STD-SOIL-01, FW-STD-SOIL-02, FW-STD-SOIL-03 and guidelines for soil management FW-GDL-SOIL-02, MA2 & MA3-GDL-SOIL-01, MA2 & MA3-GDL-SOIL-04, and MA2 & MA3-GDL-SOIL-05, and guidelines for aquatic and riparian infrastructure FW-GDL-ARINF-01, FW-GDL-ARINF-02 , FW-GDL-ARINF-03, FW-GDL-ARINF-09. These plan components will result in avoidance and or reduction in adverse impacts to the soils resource. Therefore the soils resource is dismissed from detailed analysis.” But how can the FS dismiss soils from detailed analysis since compliance with all that LMP direction can only be demonstrated in the context of detailed analysis? If anything, this validates FOC’s concerns, expressed in commentary during LMP development, that the LMP components are vague and unenforceable. If the FS cannot validate LMP effectiveness in protecting soil productivity at the juncture where soils are most fragile and vulnerable, then what good is the LMP and its components?

Our submissions during LMP revision provide specific and substantial reasons (including scientific information) which describe the highly vulnerable condition of postfire soils. This PA’s callous dismissal of potential direct, indirect, cumulative and connected impacts on soils from the Wepah fire, firefighting activities, and now your proposed management activities exemplifies your refusal to be informed by scientific information that you are aware of (and have in your possession because we provided them to you during the LMP revision process).

PA: “**Water and Aquatic Ecosystems (Including Riparian Management Zones and Conservation Watershed Networks...** RMZ standards would only be engaged if and when a temporary road must cross an RMZ, and that is something that those standards expressly anticipate and constrain. ...Because there are no unusual or extraordinary circumstances that would prevent these plan components from being effective, this issue presents no unresolved conflicts concerning alternative use of available resources or significant site-specific impacts that have not already been evaluated. Therefore, Water and Aquatic Ecosystems are not analyzed in detail.” This is another example of a failure to reconcile scientific information **in your possession** by callously dismissing likely direct, indirect, cumulative and connected impacts on

water quality and aquatic ecosystems and species from the Wepah fire, firefighting activities, and your past and proposed management activities.

Log hauling will result in sediment deposition to streams. From an investigation of the Bitterroot Burned Area Recovery Project, hydrologist Rhodes (2002)¹ notes, “On all haul roads evaluated, haul traffic has created copious amounts of mobile, non-cohesive sediment on the road surfaces that will elevate erosion and consequent sedimentation, during rain and snowmelt events.”

USDA Forest Service, 2001a also presents an analysis of increased sedimentation because of log hauling, reporting ‘Increased traffic over these roads would be expected to increase sediment delivery from a predicted 6.30 tons per year to 7.96 tons per year.’”

USDA Forest Service, 2016b (the NPCNF’s Johnson Bar Draft EIS, evaluating post-fire logging) states, “Increased heavy-truck traffic related to log hauling can increase rutting and displacement of road-bed material, creating conditions conducive to higher sediment delivery rates (Reid and Dunne, 1984).” The abstract from Reid and Dunne, 1984 states:

Erosion on roads is an important source of fine-grained sediment in streams draining logged basins of the Pacific Northwest. Runoff rates and sediment concentrations from 10 road segments subject to a variety of traffic levels were monitored to produce sediment rating curves and unit hydrographs for different use levels and types of surfaces. These relationships are combined with a continuous rainfall record to calculate mean annual sediment yields from road segments of each use level. A heavily used road segment in the field area contributes 130 times as much sediment as an abandoned road. A paved road segment, along which cut slopes and ditches are the only sources of sediment, yields less than 1% as much sediment as a heavily used road with a gravel surface.

Your Johnson Bar FEIS states, “Past management activities and the fire burn severity in the project area have caused Detrimental Soil Disturbance (DSD) and affected soil productivity. ... Fire severity that detrimentally effects soil conditions leads to further degradation of soil productivity and soil-hydrologic function. ... Burn severity describes the effects of the fire on soil structure, infiltration, capacity, and biotic components, and is used to indicate runoff, soil erosion potential, and detrimental soil disturbance from the fire (USDA FS 2014). Burn severity is defined through differences in surface organics, duff cover, and characteristics of mineral soils.” The PA gives no indication that the FS is considering the condition of postfire soils as it proposes activities that will increase erosion, compaction, displacement, productivity losses from weed spread, etc.

“Ecosystem disturbances, such as timber harvest and wildfire, can create conditions that favor large-scale invasions of non-native plants (Hobbs and Huenneke 1996).” (Id.) Yet the PA dismisses the issue, stating: “Ultimately invasive species were not determined to need a detailed analysis due to the guidelines and objectives laid out in the Forest Plan and discussed above because existing conditions are not expected to exceed ecological thresholds.” The PA mentions “ecological thresholds” **for other resource issues** as well as weeds, yet **in each case** fails to define or identify such thresholds. It appears the FS is using the term “ecological thresholds” to arbitrarily dismiss likely environmental impacts and justify little to no analysis.

¹ Documents we cite are in the Planning Record for the LMP because we gave them to the FS during that process.

PA: “Temporary roads and skid trails will be designed to be hydrologically disconnected from the drainage system.” The FS does not explain how the proposed temporary roads (including new culverts) proposed to cross streams can be “hydrologically disconnected from the drainage system.” This makes absolutely no sense. Installing culverts means soil disturbance—lots of it—right within a stream channel or artificial waterway connected to a stream channel. The FS must conduct a genuine environmental analysis—not concoct nonsensical reasons why it doesn’t have to.

The FS must conduct an analysis explaining how the transportation system—including but not limited to the specifically mentioned motorized trail—is consistent with the LMP, with the Clearwater National Forest Travel Planning decision and NEPA documentation, and with the Travel Management Rule and associated executive orders.

The PA: “The existing transportation system within the project area includes approximately 20.5 miles of National Forest National Forest System Roads (NFSR) that have maintenance needs. These roads are: NFSR 768, 1423, 1423-I, 377, 3307 and 768-J. Many sections of these roads are hydrologically connected to streams within the project area and contribute chronic, low-level sediment delivery during spring melt and storm events. Some ditch relief and stream crossing culverts on these roads are not functioning properly or cannot facilitate haul.” The PA doesn’t indicate that the FS has undertaken a thorough investigation of the entire road network in the project area, including roads not needed for logging and nonsystem roads whose conditions may be affecting water quality. For the proposed actions to be restorative as advertised, the FS must conduct comprehensive analyses and document all existing watershed liabilities from roads. Deficiencies in disclosures at the public input stage obstruct interested parties from describing alternatives that could implement LMP direction and genuine restoration without the ecological damage inevitable with logging and road building/reconstruction.

The PA admits the project area has been heavily logged and roaded in the past, but the FS proposes as its sole action alternative one that would exacerbate the damage, prior to completion of the scoping process under NEPA which is by law the point in time when information is gathered that informs the range and details of alternatives.

PA: “Proposed actions are designed to ... promote restoration of western white pine dominated forestlands.” Please disclose documentation that demonstrates the FS has been successful at fostering mature western white pine trees and “western white pine dominated forestlands” and is not mostly setting up conditions favoring a nonnative tree pathogen.

PA: “If the proposed action is not completed native flora and fauna will be stunted from conifer overstory remaining causing an opportunity for invasive species that are currently present to spread.” Stunted....? The trees are stunting animals and other plants? Sounds like science and facts are out the window, and propaganda is the main show now.

“To reduce the probability of establishment or expansion of invasive weeds, the Land Management Plan includes guideline FW-GDL-INV-01, which specifies that management activities prone to significant soil disturbance or exposure should be planned and implemented

with prevention measures to address the potential spread of invasive weeds. (Forest EIS, Chapter 3.2.5, PG 312, Paragraph 4). There are systems in place to reduce establishment of invasive weed management provided by the Forest Plan which includes a guideline to address these issues that arise in post-fire habitat restoration (FW- GDL- INV-03). To reduce the probability of establishment or expansion of invasive weeds, guideline FW-GDL-INV 01 requires management activities prone to significant soil disturbance or exposure to be planned and implemented with prevention measures to address the potential spread of invasive weeds. (Chapter 3.5.3, Effects Common to Action Alternatives, PG 1556, paragraph 2).” But what actions will the FS actually *do* to counteract the likely increase of weed spread from project activities? Oh right—“ existing conditions are not expected to exceed **ecological thresholds**” (emphasis added). Whatever that means.

The PA says nothing about old growth or its presence in the project area. Concerning the fisher, an old-growth obligate species, it states: “This project is consistent with coarse filter and species specific plan components for fisher (SCC) which occur within the project area. ...The retention of live and dead trees will allow the area to provide future denning structures as forests regenerate. The project would not affect the long-term persistence of any species.” The LMP and the PA utterly fail to promote or insure viability (diversity under NFMA) for native wildlife.

PA: “(T)here is a need to ...manage forest vegetation to reduce total stand density...” Thus, the FS reveals that “salvaging” timber affected by the fire is not necessarily its priority. It’s getting out the cut no matter what. The PA gives no indication the degree to which stands are being targeted for clearcutting where tree mortality is limited. NO MATTER WHAT THE CONDITIONS ARE IN THE FOREST, the FS will “prescribe” clearcutting to make things “more resilient” whatever that means. And as you know the logging activities will increase greenhouse gas emissions and reduce the amount of carbon stored in the ecosystem over decades to come. With climate change effects already dire and worsening globally every year, it’s not a stretch to say that NPCNF officials are proposing to throw gasoline on the fire.

PA: “(T)his project will support the durability and resiliency of forests, reduce wildland fire risk to communities, critical infrastructure, or key ecological values, and reduce hazardous fuels to help make wildfire response, as well as ingress or egress, safer and more effective.” The PA makes this perfunctory statement in response to political talking points, to justify invoking “emergency” authorities that essentially cut the public out of the decisionmaking space. The fire burned a lot of vegetation which means by your own metrics that future fire risk has been reduced. The FS is fond of saying it needs to manage vegetation because the fire suppression it has been zealously implementing has damaged the ecosystem. In this case, the fire burned in spite of your efforts to **suppress all fires** (the Forest Service’s and Agriculture departments own recent statements of intent and policy). Now, the PA is essentially demonizing the ecosystem’s audacity to act out of agency control! There isn’t a single sentence in the PA recognizing or acknowledging the restorative nature of any aspect of the fire. All this makes sense only in the context of an agency being completely controlled by a resource extractive mindset that is also fully aware that it must spin its voracious timber extraction plans as somehow good for forests.

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The FS should conduct a transparent economic analysis that addresses the concern that this proposal would be a significant loss for U.S. citizens no matter what the sale of timber nets agency coffers. The FS should disclose the financial interests of the non-federal “collaborators” it implies are basically running the analysis process and who would reap financial returns or may have already received financial gain. As it now stands, the PA represents scant details of a decision that has been already been committed to, in violation of NEPA.

On April 16, 2026 FOC submitted a request under the Freedom of Information Act to the Forest Supervisor, requesting all documents concerning this proposal. We received a response dated May 14, 2026 which said “We have conducted a search for records and located 0 documents responsive to your request. Interdisciplinary teams are evaluating potential actions to take; however, no action has been finalized and no NEPA analysis is underway at this time. No FANEC has been signed, nor initiated at this time, as such, there are no records that respond to your request.” This is despite the fact that we had in our possession, transmitted from the FS this past April, a Periodic Timber Sale Announcement letter we had recently received from the NPCNF which included this entry:

District:	52	Palouse	Const/Recon Miles:	0.00	/	12.00	Location:	T42N R3W
Sale#:	28523	Name: Wepah Fire Salvage SBA	Decision Date:	03/30/2026			Estimated Bid Date:	08/20/2026
Sale Type/Authority:	Conventional							
Remarks:	ST JOE MARKET AREA							
Product			Volume CCF	Volume MBF				
01 Sawtimber			17,869	10,700				
Total:			17,869	10,700				

We note that document disclosed a specific volume of timber anticipated for the “Wepah Fire Salvage SBA” timber sale. Clearly, the FS lied when it responded saying it had no documents concerning this proposal in May of this year (unless they had made up from thin air that projected 10,700 MBF volume of timber).

FOC submitted a second request under the Freedom of Information Act on July 16, 2026, requesting all documents concerning this proposal. **To date, we haven’t even received an acknowledgment of our second request.** In fulfilling our request, we suggest the Supervisor make available all the documents the agency is obligated to provide on the project website, and then make notice of them to all interested parties along with a re-initiation of the comment period, preferably for a minimum of an additional 30 days.

The PA: “In order to provide social and economic benefits to the local community, timber harvest must occur as quickly as possible to recover value from fire-killed trees.” Since it’s been at least 10 months since the fire was extinguished, it seems the only FS hurry is to get beyond the public comment period.

In closing, we emphasize that FOC’s comments and objection to the revised LMP include discussions and reasoning very much on point as commentary on the Wepah Salvage proposal, whose “overall purpose ...is to facilitate the implementation of the LMP...” Because of the excessively and unreasonably short timeframe for comments provided by the FS, we are doing our best by referring to and incorporating those comments and objections (along with their supporting scientific research articles and cited documents) within this letter, so as to cover and explain the issues much better than can a rushed comment letter.

Sincerely,

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