BlueRibbon Coalition
P.O. Box 5449
Pocatello, ID 83202
208.237.1008
brc@sharetrails.org

Ben Burr, Executive Director
BlueRibbon Coalition
P.O. Box 5449
Pocatello, ID 83202

August 4, 2026

Buddie Carroll, District Ranger
Palouse Ranger District, Nez Perce-Clearwater National Forests
1700 Highway 6
Potlatch, ID 83855

Dear Mr. Carroll,

BlueRibbon Coalition (BRC) submits the following comments on the Wepah Salvage Project (#370312) Proposed Action for Comment. BRC is a national non-profit organization that champions responsible recreation and encourages a strong conservation ethic and individual stewardship. We champion responsible use of public lands and waters for the benefit of all recreationists by educating and empowering our members to secure, protect, and expand shared outdoor recreation access by working collaboratively with natural resource managers and other recreationists. Our members use motorized and non-motorized means of recreation, including OHVs, motorcycles, snowmobiles, mountain bikes, and hiking, to enjoy federally managed lands throughout the United States, including the Nez Perce-Clearwater National Forests. BRC members visit the Palouse Ranger District, including the Giant White Pine Campground, Trail #221-A, and Trail #228, for motorized recreation, camping, hunting, wildlife viewing, and similar pursuits, and BRC members and supporters have concrete, definite, and immediate plans to continue such activities in this area in the future.

BRC strongly supports the Wepah Salvage Project. We urge the Palouse Ranger District to implement the Proposed Action at its full, currently analyzed scope — or greater, where opportunity allows — without any reduction to the acreage, road mileage, or infrastructure work described below.

Active Vegetation Management and Forest Health

BRC supports salvage harvest, fuel treatment, and reforestation on the maximum amount of acreage possible, and we support the full 600 acres of commercial harvest (559 acres of regeneration harvest and 41 acres of intermediate harvest) proposed within the Wepah Fire perimeter, together with the associated fuel treatments and reforestation of western white pine, western larch, and ponderosa pine on 559 of those acres.

The science on this point is not close. A 2024 Tamm Review meta-analysis of treatment outcomes across the western United States found that combining mechanical treatment with prescribed or pile burning reduced the severity of subsequent wildfire by 62 to 72 percent compared to untreated stands (Davis, Peeler, Fargione, Haugo, Metlen, Robles & Woolley 2024, Forest Ecology and Management). A 2026 study in Science, analyzing fuel treatments across eleven western states, found that every dollar spent on fuel treatment returned $3.75 in avoided wildfire damages, that fires were more than 13 percentage

points less likely to keep spreading once they reached a treated stand, and that treatment reduced total burned area by 36 percent and high-severity burned area by 20 to 35 percent (Strabo, Bryan & Reimer 2026, Science). These are not marginal effects — they are the difference between a manageable fire and a landscape-altering one, and they are exactly the outcome the Wepah Salvage Project is designed to produce.

Speed matters as much as scope. The agency's own analysis for this project cites research showing that fire-weakened trees continue to die for years after a fire as bark beetles attack the survivors (Hood, Varner, van Mantgem & Cansler 2018, Environmental Research Letters) — the same dynamic already observed in the Wepah project area. Every season of delay also erodes the economic value the project is designed to recover: a U.S. Forest Service Southern Research Station analysis of salvage timber following the 2000 Bitterroot fires found that fire-killed timber retained only 87 percent of its green value one year after the fire, 64 percent after two years, 50 percent after three years, and just 22 percent after four years — and that a single year's delay in one salvage decision cost an estimated $4.2 million in lost value (Prestemon, Wear, Stewart & Holmes 2006, USFS Southern Research Station). The roughly 600 acres of merchantable timber killed by the Wepah Fire is, by the EA's own account, “rapidly deteriorating.” Every month spent deliberating instead of implementing is value that cannot be recovered.

We urge the District to look for opportunities to expand the treated acreage further, wherever additional dead, dying, or hazardous timber is identified within the analysis area, consistent with the emergency authority under which this project is being processed.

Endangered Species Act and Emergency Timber Directives

BRC supports the Forest Service's finding that the proposed action is not likely to adversely affect the North American wolverine and will have beneficial effects on the monarch butterfly and Suckley's cuckoo bumble bee, and we encourage the agency to use the full flexibility Congress and the Administration have provided for expedited, science-based compliance.

This project is explicitly authorized under Secretary of Agriculture Brooke Rollins' Secretarial Memo 1078-006 (April 3, 2025), “Increasing Timber Production and Designating an Emergency Situation on National Forest System Lands,” which designated an Emergency Situation Determination across 112.6 million acres of National Forest System land — including the Wepah project area — specifically to reduce the risk of fire, insects, and disease. That determination implements Executive Order 14225, “Immediate Expansion of American Timber Production” (March 1, 2025), which directs the Departments of Agriculture and Interior to expand timber offerings, reestablish categorical exclusions for timber salvage, and use the ESA's emergency-consultation procedures “to the maximum extent permissible under applicable law” to facilitate timber production. Declining to use the full scope of tools these directives make available — including expedited ESA consultation where warranted — would run counter to the very authority under which this project is being advanced.

Roads and Infrastructure

BRC supports the full scope of road work proposed: approximately 20.5 miles of system road maintenance on Forest Service Roads 768, 1423, 1423-I, 377, 768-J, and 3307, and approximately 8.5 miles of temporary road construction needed to access harvest units. We ask the District to implement all of this mileage as analyzed, and to evaluate whether any temporary road alignments could be retained as system roads — rather than automatically decommissioned — where they would provide lasting benefit for recreation access, administrative use, or future fire response. The EXPLORE Act (Public Law 118-234, signed January 4, 2025) directs federal land management agencies to expand outdoor recreation access, including motorized access, and to plan for growth rather than reduction in recreation use; every mile of well-maintained road that stays open serves that mandate.

BRC also strongly supports the recreation infrastructure components of this project: replacement of the motorized trail bridge on Trail #221-A at Mannering Creek, the half-mile reroute of Trail #228, and the half-acre expansion of visitor parking at the Giant White Pine trailhead. These improvements directly serve BRC members and are exactly the kind of investment the EXPLORE Act calls for.

Public Safety and the Recreation Economy

Reopening this area safely is not a secondary benefit of this project — it is one of the reasons treatment needs to proceed at full scope. Standing dead and dying trees left behind by wildfire are a well-documented hazard: research on hazard-tree risk published in PLOS ONE found that falling trees and snags kill more than 200 people per year in the United States, and identified fire-killed stands as a leading contributor to that risk (Oberle, Ogle, Zanne & Woodall 2018). Visitors returning to the Giant White Pine Campground, trailhead, and surrounding trail system deserve a landscape that has been actively made safe, not one left to resolve itself over the many years it can take fire-killed snags to fall on their own.

The stakes for the local recreation economy are real. The Nez Perce-Clearwater National Forests draw approximately 550,000 visitors a year, who spend an estimated $28.4 million annually in surrounding communities (USDA Forest Service, Benefits to People report). Statewide, off-highway vehicle recreation alone contributes close to $1 billion in annual spending and more than $250 million in local tax and labor income to Idaho's economy (NOHVCC/University of Idaho economic impact studies). Restoring safe, healthy forest conditions and reliable access to this area protects that economic activity for Latah County and the surrounding region.

Conclusion

BRC supports “shared use” of public lands. As long as overall visitation is appropriate for the affected resources, motorized and non-motorized users can be compatible with one another so long as individual users understand designations and plan their activities accordingly. Motorized and non-motorized recreation often overlap, as OHV access frequently increases the reach of non-motorized activities such as hiking, camping, and equestrian use. We hold that responsible recreational use of public lands can exist in harmony with the ecosystem restoration this project is designed to achieve — in this case, we believe the two goals are the same goal.

BRC urges the Palouse Ranger District to adopt the Proposed Action at its full scope — 600 acres of harvest and reforestation, 20.5 miles of road maintenance, 8.5 miles of temporary road construction, and the full recreation infrastructure package — without reduction, and to pursue additional treatment acreage wherever the emergency authority and on-the-ground conditions allow.

BRC would like to be considered an interested party for this project. Information can be sent to the following address and email:

Simone Griffin
BlueRibbon Coalition
P.O. Box 5449
Pocatello, ID 83202
brmedia@sharetrails.org

Sincerely,





Ben Burr
Executive Director
BlueRibbon Coalition

Simone Griffin
Policy Director
BlueRibbon Coalition