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Title:

Comments: Attached are AFRC's Draft EA comments for the Wepah Fire Salvage Project. This is a good project salvaging timber that was burned last September and needs to be implemented quickly.

Thank you for the opportunity to comment.

Tom Partin

AFRC

Dear Buddie: On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide comments on the Wepah Fire Salvage Project.

AFRC is a regional trade association whose purpose is to advocate for sustained timber yield harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies, and decisions regarding access to and management of public forest lands and protection of all forest lands. Many of our members have their operations in communities within and adjacent to the Nez-Perce Clearwater National Forest and management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

The human caused Wepah fire was stated on September 2, 2025, and was approximately two air miles east of Giant White Pine Campground. The wildfire was eventually contained on September 25, 2025, and burned 1,522 acres. The Wepah Fire burned through mature forest, young forest and established plantations. Fire effects were determined to be moderate to high severity causing a high level of mortality among all age-classes of trees.

AFRC supports the Purposes of the Project which are:

[bull] Moving towards the attainment of multiple desired conditions defined in the Land use Management Plan. That includes maintaining the transportation system for public access and management of forest lands. Vegetation and fuels management is an important tool that may be used to move towards desired conditions for forest species composition.

[bull] Moving towards desired conditions for recreational opportunities and recreation infrastructure. Here again there is a nexus between the transportation system and public access to recreational opportunities. The purpose of the Wepah Salvage project is further defined to provide additional recreational opportunities, prevent resource damage and promote public safety.

[bull] Providing raw materials for the local sawmilling infrastructure.

Taken together, this suite of desired conditions contributes to moving this landscape towards a more resilient ecosystem while improving the transportation system, access to public recreation opportunities, and contributing to both economic and social sustainability.

While we strongly support the project and moving the project area towards desired conditions we offer the following comments that we hope will support and encourage salvage and restoration in the project area.

1. AFRC supports the District using the Emergency Salvage Determination (ESD) signed by Agriculture Secretary Brooke Rollins on April 3, 2025, to more rapidly complete the restoration work needed from this wildfire. The Wepah Salvage project area falls within the landscape identified under the ESD because the area is experiencing declining forest health; and is at risk of experiencing substantially increased tree mortality over the next 15 years from insect and disease infestation; and contains hazard trees posing an imminent risk to public health, infrastructure, and safety.

2. AFRC supports salvaging 600 acres of commercial timber to recover the economic value, manage forest vegetation to reduce total stand density, improve species composition towards seral species dominance, improve size class distribution to promote forest resiliency, and break up continuity of fuels to mitigate the risk of wildfire.

The timber products provided by the Forest Service in this salvage operation is crucial to the health of our membership. Without the raw material sold by the Forest Service these mills would be unable to produce the amount of wood products that the citizens of this country demand. Specifically, studies in Idaho have shown that 12-15 direct and indirect jobs are created for every one million board feet of timber harvested. Without this material, our members would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities they operate in. These benefits can only be realized if the Forest Service sells their timber products through sales that are economically viable. This viability is tied to both the volume and type of timber products sold and the way these products are permitted to be delivered from the forest to the mills.

AFRC members depend on a predictable and economical supply of timber products off Forest Service land to run their businesses and to provide useful wood products to the American public. This supply is important for present-day needs but also important for future needs. This future need for timber products hinges on the types of treatments implemented by the Forest Service today. Of importance is how those treatments affect the long-term sustainability of the timber resources on Forest Service managed land. Not managing the maximum number of acres today will impact the ability to produce the timber needed in the future. This is especially true when considering this wildfire event. The risk of widespread insect and disease infestations to surrounding forested areas will be elevated if the burnt material on affected Forests isn't addressed quickly.

3. Time is of the essence for successful salvage of the burned areas. It is well known that bark beetles and wood boring insects can and will infest and reproduce to epidemic populations in fire-damaged trees. Bark beetle and wood boring insect populations are variable across northern Idaho and western Montana, exacerbated by multiple years of drought conditions that have stressed trees and created susceptible stand conditions. The combination of existing beetle pressure and the vast extent of preferred host material created by recent significant wind events are expected to facilitate epidemics lasting multiple years.

To expedite the recovery of this Fire salvage material it will be incumbent upon the Agency to offer this material at base rates to ensure the material is economically feasible for our members to remove. Unlike conventional timber sales, fire killed timber poses unique challenges such as dangerous conditions working within snaggy areas, most likely heavy dust and charcoal affecting both equipment and people working on the project, also there will be trees broken into lengths not favored by sawmills and split and broken pieces that will have high defects. Also splitting and checking of the wood will occur quickly along with beetle borings and blue stain fungus in the pine species.

4. The logging plan calls for [ldquo] Ground-based equipment will operate on slopes less than 45%, and tractor skidding will occur on slopes less than 35%. Exceptions to ground based equipment over 45% slope can be authorized on a case-by-case basis where soil, slope, and equipment are determined appropriate to maintain soil functions.[rdquo] Logging systems will avoid high burn severity primarily by using skyline/cable systems, but also winter logging, and/or slash mats as circumstances permit a

With these options available, we remind you that the primary issue affecting the ability of our members to feasibly deliver logs to their mills is firm operating restrictions. As stated above, we understand that the Forest Service must take necessary precautions to protect their resources; however, we believe that in many cases there are conditions that exist on the ground that are not in step with many of the restrictions described in Forest Service EA and contracts (i.e. dry conditions during wet season, wet conditions during dry season). We would like the Forest Service to shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results; in other words, describe what you would like the end result to be rather than prescribing how to get there. There are a variety of operators that work in the designated areas of Region 1 market areas with a variety of skills and equipment. Developing a EA and contract that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators. For example, restricting certain types of ground based equipment rather than describing what condition the soils should be at the end of the contract period unnecessarily limits the ability of certain operators to complete a sale in an appropriate manner with the proper use of their equipment. To address this issue, we would like to see flexibility in the EA and contract to allow a variety of equipment to the sale areas. We feel that there are several ways to properly harvest any piece of ground, and certain restrictive language can limit some potential operators. Though some of the proposal area is planned for cable harvest, there are opportunities to use certain ground equipment such as fellerbunchers and processors in the units to make cable yarding more efficient. Allowing the use of processors and fellerbunchers throughout these units can greatly increase its economic viability, and in some cases decrease disturbance by decreasing the amount of cable corridors, reduce damage to the residual stand and provide a more even distribution of woody debris following harvest.

We would like to see the recognition of tethered-assist equipment in the project proposal. Tethered-assist logging is becoming a more economical, safe, and available method of yarding on steep slopes throughout the region. This equipment has been shown to contribute to little additional ground disturbance when compared to traditional cable systems. The weight displacement provided by tethering allows tracked equipment to operate on steep ground with limited soil displacement or compaction. Standard psi levels for that tracked equipment are transferred to the tethering uphill. Please prepare your NEPA analysis documents in a manner that will facilitate this type of equipment.

Green, P. Q., Chung, W., Leshchinsky, B., Belart, F., Sessions, J., Fitzgerald, S. A., Wimer, J. A., Cushing, T., Garland, J. J. (2019). Insight into the productivity, cost and soil impacts of cable-assisted harvester forwarder thinning in western Oregon. *For. Sci.* 66(1):82[ndash]96

A key point of the Green paper includes:

[bull] The use of cable assistance can reduce track coverage and reduce shear displacement, and thus lessen potential soil impact caused by forestry machines.

Garland, J., F. Belart, R. Crawford, W. Chung, T. Cushing, S. Fitzgerald, P. Green, et al. 2019. Safety in steep slope logging operations. *J. Agromedicine* 24(2):138[ndash]145.

A key point of the Garland paper includes: [bull] Use of new tethered-assist technology reduces exposure to hazards and reduces workers exposed to the most dangerous work in logging[mdash]felling and working on cable operations on steep slopes.

Finally, AFRC would like the Forests to examine the days that operations and haul are shut down due to hunting seasons and other outdoor recreation. The logging community has limited operating time at best, and further reductions such as these only makes surviving in the logging business much more difficult.

5. AFRC supports the road management plan that calls for maintenance on approximately 20.5 miles of system road and building approximately 8.5 miles of temporary roads. However, we encourage the District to keep these roads at a low level of maintenance so that road costs do not overburden the project with high costs.

6. The District used the LMP to analyze Climate Change and Forest Carbon to the required findings of the FONSI. The nature of the proposal and the effects are substantially the same because the analysis covers effects to carbon stocks from terrestrial vegetation, fire and fuels management, timber harvest, livestock grazing, invasive plants, and aquatic habitat, riparian management zones, and water resources. From AFRC's perspective, massive amounts of carbon have already been released into the atmosphere, and much more will continue from dead trees that are currently standing and deteriorating. The only way to limit CO₂ being emitted into the atmosphere is to convert the dead trees into lumber and wood products that will sequester the carbon for decades to come.

7. The EA addresses Federally listed Threatened, Endangered, Proposed, and Candidate Species which include the North American Wolverine, the Monarch Butterfly, and Suckley's Cuckoo Bumble bee. The project area does not contain the remote high elevation habitat conditions preferred by wolverine, but dispersing wolverine may occasionally enter. The area contains modeled dispersal habitat for the North American Wolverine. Monarch adults may migrate through the project area but there is no milkweed present to support reproduction. Suckley's Cuckoo Bumble Bee has not been observed but had a broad historical distribution across North America including Idaho. The project has the potential to have the fisher present, but no other Species of Conservation Concern occurs in the project area. AFRC strongly recommends that all of these species would be best served by removing the dead and dying timber and getting the burned over areas revegetated with healthy young trees that will later provide the habitat needed for the above listed species.

8. Wildfires provide excellent habitat for unwanted invasive species. The proposed actions will create more planned and implemented actions to lower and reduce invasive weeds from getting a foothold within the project area. To reduce the probability of establishment or expansion of invasive weeds, the Land Management Plan 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. Thus, the bare soil present now that is conducive to invasive weed species should have the salvage work completed, and reintroduce native grass, shrub, and tree species that will prevent unwanted invasive species.

9. AFRC would like the District to elaborate more on a No Action Alternative. We believe it would be devastating to not treat this burned area and to allow the remaining timber to fall over and rot and the land get covered by invasive species. The Draft EA states: [ldquo]Under the no action alternative, hazardous fuel loading created by the Wepah Fire would remain untreated, increasing the risk of a high severity reburn within the same footprint. A subsequent fire could increase erosion, sedimentation, and peak flow delivery to Meadow Creek and its tributaries beyond what is anticipated under the proposed action. No action would also forgo the opportunity presented by harvest and replanting to shift species composition toward more fire, insect, and disease resilient conditions, an outcome that over time supports watershed and riparian resilience relative to existing departed conditions.[rdquo] We believe a more graphic picture should be painted regarding how long it takes landscapes to heal and how so many opportunities are lost if action isn't taken to rehabilitate this area, and to capture the value of the timber

Thank you for the opportunity to provide Draft EA comments on the Wepah Salvage project. We encourage quickly implementing the project once the Decision has been signed.