Data Submitted (UTC 11): 8/4/2026 7:00:00 AM
First name: Randy
Last name: Fox
Organization: Idaho Conservation League
Title: West Central Idaho Director
Comments: Please accept the attached document as the comments from the Idaho Conservation League for the proposed Wepah Salvage Project.

Dear Mr. Carroll:I am writing on behalf of the Idaho Conservation League (ICL) to provide our commentsand recommendations on the proposed Wepah Salvage Project.Founded in 1973, the mission of ICL is to create a conservation community andpragmatic, enduring solutions that protect and restore the air you breathe, the water youdrink, and the land and wildlife you love. ICL[rsquo]s seven strategic initiatives includeconfronting climate change, recovering Idaho[rsquo]s wild salmon and steelhead, cleaning upthe Snake River, protecting public land, restoring abundance and diversity of Idaho[rsquo]swildlife, safeguarding North Idaho lakes and waters, and reducing pollution. ICLachieves these goals through public outreach and professional advocacy. With offices inBoise, McCall, Ketchum, and Sandpoint, the organization is a consistent, statewidevoice for conservation in Idaho and represents more than 26,000 members andsupporters. ICL[rsquo]s members and supporters care deeply about protecting and restoringthe environment.ICL recognizes that the Palouse Ranger District of the Nez Perce-Clearwater NationalForest is highly managed, and we appreciate the opportunity to provide comments onthe proposed Wepah Salvage Project. We concur with the agency[rsquo]s decision to createthe Wepah Salvage project with a tightly constrained project boundary. Our largestconcern focuses on potential sediment delivery through road maintenance, temporaryroad construction and use, and ultimately temporary road decommissioning andobliteration. We appreciate the Forest Service[rsquo]s inclusion of numerous standards andgoals 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, webelieve that minor adjustments to the commercial harvest unit and prescription plan willdecrease opportunities for sediment delivery in Wepah Creek, which will also helpimprove conditions in the East Fork Meadow Creek.We note that Unit 3 consists of 266 acres of regeneration cuts, whereas Unit 2, locatedjust north of Unit 3 on the opposite side of Wepah Creek has a recommendedIntermediate harvest proposed. We recommend that the Forest Service convert portionsof Unit 3 that are closest to Wepah Creek to an intermediate harvest. While it may meanless timber is harvested for economic gain, the retention of more trees, either dead oralive, along Wepah Creek[rsquo]s south bank will provide continued shade to cool the creekwaters while at the same time providing soil stabilization and filtration, trapping anysediment generated by temporary roads before it reaches Wepah Creek. We furtherrecommend that the Forest Service require operators to erect silt fencing betweentimber harvest locations and temporary roads and Wepah Creek, where appropriate.We also support the Forest Service[rsquo]s proposal to retain live large trees with a 15[rdquo] DBHor greater and to retain 600 snags per 100 acres, as well as the commitment to retainan appropriate amount of coarse woody debris throughout the project area. Thiscommitment will provide wildlife habitat, shade, and soil stabilization, all components ofa healthy ecosystem. The design features also include a reference toFW-GDL-WLMU-02 to support large game winter habitat identified in Unit 5. Thepurpose of the design feature is to minimize large game disturbance betweenDecember 1 and March 15. However, this is the sole design feature focused on wildlifeand seasonal restrictions. We ask that the Forest Service review species populationsand location data, including wildlife surveys conducted within the past 5 years, todetermine if sensitive or species of greatest conservation concern migratory birds orraptors have breeding or rearing habitat within the project area that would warrantfurther seasonal restrictions or avoidance measures.Regarding the recreation improvements associated with the Wepah Salvage Project, weare generally supportive. However, we are concerned that the Forest Service isincluding the bridge replacement on Trail 221-A over Mannering Creek, which is welloutside 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 theappearance of an add-on project. There are numerous approval authorities within theCategorical Exclusion suite that sufficiently address the recreation componentsassociated with this project. We recommend using those authorities to approve smallimprovement

projects outside the scope of the primary project[rsquo]s Purpose and Needstatements.Once again, thank you for the opportunity to comment on the proposed Wepah SalvageProject. If you have any questions about these comments or recommendations, pleasedo not hesitate to contact us.Respectfully submitted,Randy Fox