Data Submitted (UTC 11): 8/4/2026 7:00:00 AM
First name: Simone
Last name: Griffin
Organization: BlueRibbon Coalition
Title:
Comments: Please see the attached comment.

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 responsiblerecreation and encourages a strong conservation ethic and individual stewardship. We championresponsible use of public lands and waters for the benefit of all recreationists by educating andempowering our members to secure, protect, and expand shared outdoor recreation access by workingcollaboratively with natural resource managers and other recreationists. Our members use motorizedand non-motorized means of recreation, including OHVs, motorcycles, snowmobiles, mountain bikes,and hiking, to enjoy federally managed lands throughout the United States, including the NezPerce-Clearwater National Forests. BRC members visit the Palouse Ranger District, including the GiantWhite 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, andimmediate 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 theProposed Action at its full, currently analyzed scope [mdash] or greater, where opportunity allows [mdash] withoutany reduction to the acreage, road mileage, or infrastructure work described below.Active Vegetation Management and Forest HealthBRC supports salvage harvest, fuel treatment, and reforestation on the maximum amount of acreagepossible, and we support the full 600 acres of commercial harvest (559 acres of regeneration harvest and41 acres of intermediate harvest) proposed within the Wepah Fire perimeter, together with theassociated fuel treatments and reforestation of western white pine, western larch, and ponderosa pineon 559 of those acres.The science on this point is not close. A 2024 Tamm Review meta-analysis of treatment outcomes acrossthe western United States found that combining mechanical treatment with prescribed or pile burningreduced 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 2026study in Science, analyzing fuel treatments across eleven western states, found that every dollar spenton fuel treatment returned $3.75 in avoided wildfire damages, that fires were more than 13 percentagepoints less likely to keep spreading once they reached a treated stand, and that treatment reduced totalburned area by 36 percent and high-severity burned area by 20 to 35 percent (Strabo, Bryan & Reimer2026, Science). These are not marginal effects [mdash] they are the difference between a manageable fire anda landscape-altering one, and they are exactly the outcome the Wepah Salvage Project is designed toproduce.Speed matters as much as scope. The agency's own analysis for this project cites research showing thatfire-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) [mdash] the same dynamic alreadyobserved in the Wepah project area. Every season of delay also erodes the economic value the project isdesigned to recover: a U.S. Forest Service Southern Research Station analysis of salvage timber followingthe 2000 Bitterroot fires found that fire-killed timber retained only 87 percent of its green value one yearafter the fire, 64 percent after two years, 50 percent after three years, and just 22 percent after fouryears [mdash] 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 ofmerchantable timber killed by the Wepah Fire is, by the EA's own account, [ldquo]rapidly deteriorating.[rdquo] Everymonth 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 additionaldead, dying, or hazardous timber is identified within the analysis area, consistent with the emergencyauthority under which this project is being processed.Endangered Species Act and Emergency Timber DirectivesBRC supports the Forest Service's finding that the proposed action is not likely to adversely affect theNorth American wolverine and will have beneficial effects on the monarch butterfly and Suckley's

cuckoobumble bee, and we encourage the agency to use the full flexibility Congress and the Administrationhave provided for expedited, science-based compliance.This project is explicitly authorized under Secretary of Agriculture Brooke Rollins' Secretarial Memo1078-006 (April 3, 2025), [ldquo]Increasing Timber Production and Designating an Emergency Situation onNational Forest System Lands,[rdquo] which designated an Emergency Situation Determination across 112.6million acres of National Forest System land [mdash] including the Wepah project area [mdash] specifically to reducethe risk of fire, insects, and disease. That determination implements Executive Order 14225, [ldquo]ImmediateExpansion of American Timber Production[rdquo] (March 1, 2025), which directs the Departments ofAgriculture and Interior to expand timber offerings, reestablish categorical exclusions for timber salvage,and use the ESA's emergency-consultation procedures [ldquo]to the maximum extent permissible underapplicable law[rdquo] to facilitate timber production. Declining to use the full scope of tools these directivesmake available [mdash] including expedited ESA consultation where warranted [mdash] would run counter to thevery authority under which this project is being advanced.Roads and InfrastructureBRC supports the full scope of road work proposed: approximately 20.5 miles of system roadmaintenance on Forest Service Roads 768, 1423, 1423-I, 377, 768-J, and 3307, and approximately 8.5miles of temporary road construction needed to access harvest units. We ask the District to implementall of this mileage as analyzed, and to evaluate whether any temporary road alignments could beretained as system roads [mdash] rather than automatically decommissioned [mdash] where they would providelasting benefit for recreation access, administrative use, or future fire response. The EXPLORE Act (PublicLaw 118-234, signed January 4, 2025) directs federal land management agencies to expand outdoorrecreation access, including motorized access, and to plan for growth rather than reduction in recreationuse; 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 themotorized trail bridge on Trail #221-A at Mannering Creek, the half-mile reroute of Trail #228, and thehalf-acre expansion of visitor parking at the Giant White Pine trailhead. These improvements directlyserve BRC members and are exactly the kind of investment the EXPLORE Act calls for.Public Safety and the Recreation EconomyReopening this area safely is not a secondary benefit of this project [mdash] it is one of the reasons treatmentneeds to proceed at full scope. Standing dead and dying trees left behind by wildfire are awell-documented hazard: research on hazard-tree risk published in PLOS ONE found that falling treesand snags kill more than 200 people per year in the United States, and identified fire-killed stands as aleading contributor to that risk (Oberle, Ogle, Zanne & Woodall 2018). Visitors returning to the GiantWhite Pine Campground, trailhead, and surrounding trail system deserve a landscape that has beenactively made safe, not one left to resolve itself over the many years it can take fire-killed snags to fall ontheir own.The stakes for the local recreation economy are real. The Nez Perce-Clearwater National Forests drawapproximately 550,000 visitors a year, who spend an estimated $28.4 million annually in surroundingcommunities (USDA Forest Service, Benefits to People report). Statewide, off-highway vehicle recreationalone contributes close to $1 billion in annual spending and more than $250 million in local tax and laborincome 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 Countyand the surrounding region.ConclusionBRC supports [ldquo]shared use[rdquo] of public lands. As long as overall visitation is appropriate for the affectedresources, motorized and non-motorized users can be compatible with one another so long as individualusers understand designations and plan their activities accordingly. Motorized and non-motorizedrecreation often overlap, as OHV access frequently increases the reach of non-motorized activities suchas hiking, camping, and equestrian use. We hold that responsible recreational use of public lands canexist in harmony with the ecosystem restoration this project is designed to achieve [mdash] in this case, webelieve the two goals are the same goal.BRC urges the Palouse Ranger District to adopt the Proposed Action at its full scope [mdash] 600 acres ofharvest and reforestation, 20.5 miles of road maintenance, 8.5 miles of temporary road construction,and the full recreation infrastructure package [mdash] without reduction, and to pursue additional treatmentacreage 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 thefollowing address and email:Simone GriffinBlueRibbon Coalition