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Comments: Thank you for this opportunity to provide scoping comments relating to the U.S. Forest Service's (USFS) proposal to conduct the Pepper Spring Sanitation Project on the Salmon-Challis National Forest. I write on behalf of Western Watersheds Project (WWP), a non-profit organization with more than 14,000 members and supporters, headquartered in Hailey, Idaho. Our mission is to protect and restore western watersheds and wildlife through education, public policy initiatives, and legal advocacy. WWP and its members, supporters, and staff use and enjoy America's lands and their wildlife, cultural, and natural resources for health, recreational, scientific, spiritual, educational, aesthetic, and other purposes, including areas throughout the Salmon-Challis National Forest and areas specifically affected by the Red Rock Fire. Indeed, I visited the Salmon-Challis National Forest during the pendency of the Red Rock Fire and had to adjust my plans due to the course of the fire.

The scoping notice asserts that the proposed project would comply with 36 C.F.R. § 294.24(c) with respect to the approximately 47 acres of harvest proposed within the South Deep Backcountry Restoration Idaho Roadless Area. However, it is unclear how the project could comply with that provision as none of the conditions specified in 36 C.F.R. § 294.24(c) that permit the cutting, sale, or removal of timber in an Idaho Roadless Area apply to the circumstances set out in the scoping notice. This project does not seek to reduce hazardous fuel conditions. Cf. 36 C.F.R. § 294.24(c)(1)(i)-(ii). The removal of trees in response to only a speculative threat of mountain pine beetle or Douglas-fir bark beetle, and without any supporting documentation or evidence, does not "improve threatened, endangered, proposed, or sensitive species habitat" or "maintain or restore the characteristics of ecosystem composition, structures, and processes." Instead, it achieves the exact opposite outcome by damaging that habitat and disrupting the ecosystem and ecological processes. There is no corroboration that any such threat exists, and the notice offers only a blanket assertion that a population increase of beetles is "typical." Cf. 36 C.F.R. § 294.24(c)(1)(iii)-(iv). This project also does not seek to reduce the risk of uncharacteristic wildland fire effects or set out how this timber would be for personal or administrative use. Cf. 36 C.F.R. § 294.24(c)(1)(v)-(vi). Finally, the proposed cutting, sale, and removal of timber is not incidental to another management activity—rather it is the precise management activity proposed—and there is no indication that this area qualifies as an area that was "substantially altered" prior to October 16, 2008. Cf. 36 C.F.R. § 294.24(c)(1)(vii)-(viii).

The scoping notice further alleges that a categorical exclusion under 7 C.F.R. 1b.4(d)(37) may apply to exclude the project from documentation in an environmental assessment (EA) or environmental impact statement (EIS). Yet, again, there is no documentation or evidence provided to support the blanket assertion that a population increase in beetles is "typical" or that such an increase might pose a threat that requires the harvest of trees in order to control these sorts of insects. The scoping notice does not set out any basis for this general claim or any indication that it is applicable to the proposed project area. Indeed, the entire project is premised on the idea that there is a need "to remove infested trees and adjacent uninfested trees" without any conclusion, or even the allegation, that there are infested trees in the project area. The entire project is based on speculation and assumptions and lacks an adequate basis in fact to justify proceeding with the proposed action, let alone doing so in a roadless area and without any sort of environmental analysis.

Thank you again for the opportunity to offer comments on this proposed project. We sincerely hope you will consider our recommendations for evaluating the proposed project in order to better protect native ecosystems, soil health, and other features of this area. We intend to remain involved in all stages of the planning process as well as in monitoring, scientific study, and restoration efforts in this area well into the future, and we will supplement these comments as appropriate.

We respectfully request that WWP be notified of all future public comment opportunities relating to this proposed project and of USFS's decisions concerning it. Please send a copy of any environmental analyses produced as a

result of these reviews, as well as any other relevant documents, to us at the email provided. We look forward to continuing to work with USFS to protect public lands and to return them to a properly functioning ecological state.