

La Grande Ranger District
Attn: Stephany Kerley
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La Grande, OR 97850

Comments submitted via: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=68342>

March 3, 2026

Baker County appreciates the opportunity to provide input into the Sufferin' Springs Vegetation Management Preliminary Environmental Assessment (EA). We support the project's concepts in general as they have the potential to move the project area from existing resource conditions toward more desired conditions and improve forest resiliency and reduce hazard fuels.

Unfortunately, the vast majority of remaining acres on the Wallowa-Whitman National Forest also suffer from the need for immediate implementation of one or more of the emergency actions to achieve relief from hazards threatening human health and safety. In addition, this project seems to provide enhancements to the already restricted Bald Angel project and is a wildlife habitat improvement project with the forest health improvements a secondary concern. In the County's opinion this project does not meet the Fuels and Forest Health Emergency Situation Determination.

The County acknowledges that this EA tiers to the 1990 Wallowa-Whitman Land and Resource Management Plan FEIS (Forest Plan) as amended, however, it does not tier to Baker County's Natural Resources Plan (BCNRP) as per 36 CFR 219.4 (1)(b)(1) and (2)(i, ii, iii, iv)

Coordinating with other public planning efforts. The County's Plan can be found at:

https://bakercountyor.gov/commissioners/pdfs/Adopted_Natural_Resource_Plan_Current.pdf

The Sufferin' Springs EA seems disjointed and to be focused more on biological diversity and wildlife and less on the relief from hazards threatening human health and safety. As stated on page EA-6, *"The purpose of this project is to move forest conditions, including structure, density, and species composition, towards the historic range of variability and desired conditions. The goal is to promote forest conditions that support sustainable ecological functions and processes, as well as maintenance and enhance the diversity and quality of wildlife habitat."* This is even more evident with the promotion of the diversity of vegetation structure, density, and composition in a manner that provides for the *"connectivity of wildlife"*. Table 4 is very explicit in the Purpose and Need and Driving Guidance and is focused on wildlife.

The Supportive Roadwork actions reinforce the County's and public's fears that even though there is no Travel Management Plan, projects are going to be used to close roads. The BCNRP is explicit in stating the County's access objectives; "Specifically, there will be no net loss to

access." (BCNRP, page 18) Adopted in 2016, the BCNRP was ignored during the Bald Angel fiasco and continues to be disregarded by the Forest Service today. The statement on page EA-9 of the EA, "*...there are objectively decommissioned roads, approved by previous NEPA decisions, that are currently functioning as open within the project area. There roads will be decommissioned after use.*" Miles and miles of roads are closed through the Bald Angel Travel Management Area (TMA), and this project is just going to add onto them. This is unacceptable to the Baker County citizens that use forest access to continue their customs, culture, economic viability, and subsistence foraging. Leave any newly opened, and currently open roads for the public's use. A road will either remain open through use or naturally revegetate and be closed.

16 USC § 532. Roads and trails system; Congressional findings and declaration of policy

The Congress hereby finds and declares that the construction and maintenance of an adequate system of roads and trails within and near the national forests and other lands administered by the Forest Service is essential if increasing demands for timber, recreation, and other uses of such lands are to be met; that the existence of such a system would have the effect, among other things, of increasing the value of timber and other resources tributary to such roads; and that such a system is essential to enable the Secretary of Agriculture (hereinafter called the Secretary) to provide for intensive use, protection, development, and management of these lands under principles of multiple use and sustained yield of products and services.

(Pub. L. 88-657, § 1, Oct. 13, 1964, 78 Stat. 1089.)

In APPENDICES-4, the section "Travel Restricted Areas" contains false statements. It states, "*There is one travel restricted area within the project area boundary. The Bald Angel Travel Management Area encompasses most of the project area and is established by FOREST ORDER 06-16-06-23-10 by the Wallowa-Whitman National Forest. This travel management area restricts possessing or using a motor vehicle off roads or trails within the Bald Angel Travel Management Closure Area. Several exemptions to this Forest Order apply. See Appendix C for the Forest Order and a map of the Bald Angel Travel Management Area. No changes for this travel management area are being proposed.*" There is no Appendix C with a map within this EA that addresses this issue. In addition, when Forest Order 06-16-06-23-10 is queried online, the site says, "The request is blocked." Baker County Commissioners and the Natural Resources Advisory Committee have repeatedly requested access to the Forest Order for many years, only to be denied. A FOIA request was likewise rebuffed.

The "Travel Restricted Areas" section must be removed or fixed to include the information it says is available.

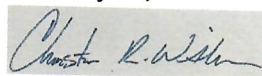
"The climate system is a coupled non-linear chaotic system, and therefore the long-term prediction of future climate states is not possible." (IPCC 2001, 2020) In the section "Additional Effects Within the Geographic Scope of the Project Area" remove the section titled "Climate Change and Fire". It has too many non-committal words such as "will likely", "which is expected to increase", and "may". Even within the section, the EA says, "...because the future climate may differ considerably from what has been observed in the past, it is difficult to project vegetative response accurately for specific locations and time periods" and "...there is considerable uncertainty in what the actual effects on vegetation owing to climate change could be (JR Holofsky, DL Person, PNW-GTR-939, 2017)". Forest resource management must be based on science, not on 'what if's'. It is well past time to quit blaming climate change on the condition of poorly managed forests.

The "Climate Change and Fire" section also needs to reflect the up-to-date rulings on what constitutes a GHG. The County recognizes that reducing fuel loads has a significant impact on carbon dioxide and other gasses being released during a wildfire that would burn at lower intensity. Remove the section on Climate Change.

The County really would like to support the entirety of this EA. As it is, Baker County fully supports the commercial thinning, noncommercial thinning, large tree felling, riparian vegetation treatments, wet meadow enhancements and prescribed fire actions. These actions go a long way in promoting forest resiliency and improving forest health. The County agrees with the overall positive effects of the actions. However, without the above sections being rewritten or removed, we can't support this project.

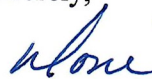
Please, do not hesitate to contact the County to visit about the comments. We stand as ready partners to find the solutions to get the Sufferin' Springs project going.

Thank you,



Christina Witham
Commissioner

Sincerely,



Doni Bruland
Natural Resources/Parks Director