



March 3, 2026

La Grande Ranger District
District Ranger Stephaney Kerley and
Environmental Coordinator Brianna Carollo
3502 Hwy 30
La Grande, OR 97850

Submitted electronically at <https://cara.fs2c.usda.gov/Public/CommentInput?Project=68342>

RE: Sufferin' Springs Vegetation Management Project
Preliminary Environmental Assessment and Draft Finding of No Significance

Dear Ranger Kerley and Ms. Carollo,

I am writing on behalf of Greater Hells Canyon Council (GHCC) regarding the Sufferin' Springs Vegetation Management Project ("project"). GHCC is a non-profit conservation organization based in Northeast Oregon with over 2,000 members and supporters. We were founded in 1967 (as Hells Canyon Preservation Council), and our mission is to connect, protect, and restore the wild lands, waters, native species and habitats of the Greater Hells Canyon Region, ensuring a legacy of healthy ecosystems for future generations.

Brian Kelly from GHCC was able to attend the open house for the project on February 20th, 2024 at the La Grande Ranger Station and a field trip to the project area in September 2024. Brian has also visited this part of the National Forest numerous times over the years. We appreciate the opportunities to discuss the project with staff.

We very much appreciate the opportunity to provide these comments.

The Project Area

The project area consists of approximately 35,900 acres of Wallowa-Whitman National Forest land in Baker and Union Counties located approximately 30 miles southeast of La Grande.

The project area is relatively close to the Eagle Cap Wilderness and is quite near to or overlapping with ODFW Priority Wildlife Connectivity Areas including corridors and core habitat areas (called "regions").

The project contains part of the Bald Angel Closure Area providing additional security for elk and deer.

The Forest Service has classified the forests of the project area as 60% dry forest, 37% moist forest, and 3% cold forest.

The project area is located near the site of the Pondosa lumber mill which operated approximately from 1927 to 1956.





The Secretary's Memorandum 1078-006 Fuels and Forest Health Emergency Situation Determination under section 40807 of the Infrastructure Investment and Jobs Act

The Sufferin' Springs project is being developed using the Fuels and Forest Health Emergency Situation Determination. This analysis considers only the Proposed Action and a No Action Alternative in detail. The Preliminary Environmental Assessment (PEA) and Draft Decision will not be subject to pre-decisional administrative review (the objection process). The PEA also contains a Draft Finding of No Significant Impact (FONSI).

Lack of an Actual Emergency and Limitations on Public Participation

It seems that the Forest Service is under pressure from the national level to implement short-cuts to the environmental analyses for forest projects. This is very unfortunate. Members of the public who care deeply about our public lands are being shut out. We don't always agree with aspects of Forest Service projects, but we have always appreciated the opportunity to be included in the processes. We feel that we have provided perspectives and information that have added value to the development of Forest Service projects. Opportunities for inclusion are shrinking and this creates barriers between the Forest Service and the public who are supposed to be served by the management of public lands. A 14 day comment period and lack of a predecisional review unnecessarily restrict public participation. This has all the appearances of a targeted approach to limit certain types of public participation.

We agree that the ecological health of our National Forests has degraded and must be addressed. However, this degradation was borne of fire suppression and logging practices over the last century.

Merriam-Webster defines an emergency as "an unforeseen combination of circumstances or the resulting state that calls for immediate action" or "an urgent need for assistance or relief" as in a state of emergency after a flood. The conditions of the forests of Sufferin' Springs and other similar projects are worthy of attention, but their current condition is certainly not unforeseen and they do not constitute an emergency.

It is well-established that the main driver of severe wildfires is not increased fuel loading, but rather climate change and weather events (Keyser, A, A Westerling. 2017. *Climate drives inter-annual variability in probability of high severity fire occurrence in the western United States. Environ. Res. Lett.* 12 065003).

Climate change is an actual emergency and unfortunately it is not being addressed.

In Oregon, the timber industry is the top source of greenhouse gas emissions, representing a major contributor to the worsening climate crisis (Lam, B.E., Hudiberg, T.W., Berner, L.T., Kent, J.J., Buotte, P.C., Harmon, M.E., 2018. *Land use strategies to mitigate climate change in carbon dense temperate forests. Proc. Natl. Acad. Sci. U.S.A.* 115 (14) 3663-3668, <https://doi.org/10.1073/pnas.1720064115> (2018).

In the recent Supreme Court ruling striking down trade tariffs imposed by the current administration, Chief Justice Roberts suggested that courts should be skeptical of reliance on alleged emergencies to infringe on powers reserved for Congress. Similarly, we are skeptical of the use of an alleged "emergency" for the environmental analysis of this and other similar forest projects.

The use of the "Emergency" determination frustrates the statutory goals of the National Environmental Policy Act ("NEPA") and the purpose of the Forest Service's pre-decisional administrative review ("objections") process, which will then unnecessarily limit the Forest Service from determining the best way to address the on-the-ground conditions of the project area.

A limited alternatives analysis in conjunction with forgoing the pre-decisional objection process will prevent the Forest Service from making the best possible management decisions.





Allowing the Forest Service to consider only a single Proposed Action Alternative dramatically limits the consideration of management activities that may differ from the Forest Service's preferred action, yet still meet the purpose and need of the project.

The Forest Service's objection process is designed to allow a final opportunity for interested individuals or entities to seek a final independent Forest Service review, negotiate, and resolve disputes about a proposed project before a final decision is made. 36 C.F.R. Part 218. The overall purpose of the pre-decisional objection process is to facilitate the Forest Service's "collaborative approach to forest management ... resulting in better, more informed decisions." 78 Fed. Reg. 18,483 (March 27, 2013). The objection process is not likely to significantly delay any implementation, as the public is required to submit any objections within 45 days after the publication of a legal notice regarding the availability of a draft EIS. 36 C.F.R. § 218.25(a)(1)(ii). The Forest Service may then begin the objection negotiation and resolution process, where discussion with interested stakeholders may produce more nuanced and appropriate management decisions—and potentially less litigation—in Forest Service projects.

Without the objection process—especially in conjunction with the limited alternatives analysis—the Forest Service is left trying to solve a problem with one arm tied behind its back. The Forest Service has a valuable problem-solving resource within the individuals and organizations that live, recreate, and work in and around the Wallowa-Whitman National Forest. We implore the agency to take advantage of that resource. The Forest Service should forgo the use of the "Emergency" determination for the project and instead continue its collaborative approach to forest management with the objection process.

For the foregoing reasons, we urge the Forest Service not to use the Secretary's Emergency Situation Determination for the Sufferin' Springs project. Not only would doing so further degrade the health of National Forest System lands, it would also put local communities, their watersheds, and the ecosystem at risk. Instead, we request that the Forest Service analyze a full suite of alternatives in an EIS, provide a robust 45-day public comment period, and engage with the public in its objection process prior to a final decision being made, consistent with past practices.

COMMENTS ON THE PROPOSED ACTION

Introduction

In general, we support vegetation management projects in forests that would benefit ecologically from management activities; that reduce impacts of cross-country travel and high road densities by decommissioning expensive, redundant, and deteriorating forest roads; and include components to improve watershed conditions and forest resiliency. Therefore, when reviewing projects, GHCC carefully evaluates the proposed action against the following criteria:

- Focus on previously logged sites. Forests that have not experienced the same logging and road-building regime as other federal lands are relatively rare and have high conservation value, especially in areas like this that have a past history of intensive logging. These previously unlogged forests are often mature or old growth forests and are often important for carbon sequestration. Soils in these forests have not been impacted by machinery and their underground ecosystems would be expected to be intact and rich in ways that are likely underappreciated and incompletely understood. Mycorrhizal networks are likely intact in these forest soils. Restoration is generally unnecessary in these forests or else can be achieved using fire alone.





- A compelling ecological need that is clearly identifiable and warrants the proposed action. Returning stands to the Historical Range of Variability (HRV) alone should not be used as a justification for landscape-scale commercial thinning.
- Protect all trees with old growth characteristics regardless of their diameter or species. Old growth characteristics include thick bark, colored bark, asymmetrical growth, large branches, and dead tops. These old trees will generally be some of the most fire resilient trees on the landscape and are very important for certain wildlife species.
- Protect all large trees. All trees 21 inches DBH and larger of all species should be retained. These large trees will generally be some of the most fire resilient trees on the landscape. Large trees are also exceptionally important for carbon sequestration.
- Fuel reduction and vegetation projects affect wildlife, non-native plants and animals, soils, insects, diseases, and more. A holistic approach to landscape management with equal input from all specialists helps enhance positive effects and minimize negative consequences.
- Utilize existing roads for removing and hauling wood products. Eliminate unneeded roads. No construction of new temporary roads.

Sufferin' Springs Proposed Action Forest Treatments

Proposed treatments include:

Commercial Logging total acreage = 10,364 acres

- 9,498 acres commercial thin
- 865 acres group select
- 171 acres commercial thin within RHCAs
- 348 acres skyline/tethered steep slope logging within acreages shown above (or 344 acres as shown in "yarding systems" totals)
- 31 MBF sawtimber volume
- 12 MBF non-sawtimber volume

Non-commercial treatments

- Post-treatment whipfell, grapple pile, hand burn, underburn = 10,364 acres
- Hand fuels = 15 acres
- Mechanical fuels = 45 acres
- Mechanical pre-commercial thin = 311 acres
- Hand pre-commercial thin = 71 acres
- Aspen enhancement = 13 acres hand thinning
- Non-commercial thin within RHCAs = 81 acres
 - hand thinning = 8 acres
 - tractor = 73 acres

Temporary Roads

- 10.75 miles total
- 5.4 miles non-system





- 5.35 miles new

Prescribed Fire

- 10,364 acres underburn
- 34,603 acres natural fuels burn units

Wildlife Connectivity Corridors and Impacts to Habitat

- We appreciate that the agency is taking a similar approach to the East Face project in identifying wildlife habitat connectivity corridors across the project area and planning for a lighter touch with higher canopy cover in these areas. We request that the wildlife biologist continues to remain involved throughout planning and implementation to ensure that goals for these particular areas are being met.
- We recommend that wildlife habitat connectivity corridors will be sufficiently wide enough to function as intended. We also recommend that habitat corridors not be limited to a minimum width, but rather that they will be defined by habitat features such as including the full extent of a delineated forest stands, plant associations, topographic features, riparian areas, and other features that may enhance wildlife connectivity across the landscape.
- We very much appreciate that wildlife habitat diversity and quality are included as identified elements within the purpose and need narrative.
- We very much appreciate that the purpose and need statement includes providing for “connectivity of wildlife within and across the project area.”

Use of the Amended Eastside Screens & Cutting Large Trees

Please clarify that large trees (greater than 21” DBH) and old trees (150 years or older) are not proposed to be commercially logged in the project.

The “comment consideration” section of the EA reads, “large trees are not included in the proposal for commercial harvest.”

However, the EA Appendix - Silvicultural Report on Forest Plan Consistency reads:

“All stands proposed for commercial thinning within the SS project have been evaluated for the need to harvest trees greater than 21” DBH. Need is based on current forest conditions and the ability to meet silvicultural objective that would reduce susceptibility to wildfire and insect and disease and move stands toward old growth conditions . . . All old trees (150 years or older) will be retained regardless of diameter . . . Trees within these larger classes would only be harvested when the activity improves forest health and enhances stand development toward sustainable old forest conditions.”

The following section indicates that commercial thinning will "generally" manage trees between 7 to 21 inches DBH, but does not necessarily preclude cutting larger or older trees:

‘Elements Common to the Proposed Action

Silvicultural Treatment Prescriptions/ Objectives

A full range of silvicultural methods were considered to respond to the identified purpose and need as well as key issues for the project. In general, the prescriptions selected are intermediate harvest using various commercial thinning techniques further defined below. Commercial thinning prescriptions generally manage trees in the 7-inch





to 21" dbh class. The remainder of the stand would be managed by post-harvest prescriptions such as noncommercial thinning (less than 7' dbh class) and prescribed burning."

The following section seems to indicate that cutting of large trees would be non-commercial only and the trees would remain on site for and limited as described below:

"Non-commercial Large Tree Felling

All proposed commercial thinning treatments include the option of post-harvest felling large trees competing with large early seral trees and leaving them on site. The intent of this treatment is to benefit healthy, large, early seral trees such as ponderosa pine, and western larch. These early seral species would be released from competition with shade tolerant conifers, such as grand fir, by felling shade tolerant trees up to 30 inches dbh within one to two drip lengths (outer circumference around the canopy) of the release tree's crown, but not to exceed sixty feet. Situational felling of grand fir up to 30 inches dbh is intended to meet the following objectives: 1) to remove shade tolerant understory that may act as ladder fuel during a wildfire, and 2) to provide more light for the development of the release tree's seedlings. In shelterwood treatments, grand fir would be used for snag and down wood creation."

Our GHCC scoping comments of 2024 included this section:

Use of the amended Eastside Screens & cutting large trees

- As you are aware, Magistrate Judge Hallman of the District of Oregon recently found that the Forest Service's 2021 Amendment to the Eastside Screens violated NFMA, NEPA and the ESA, and recommended that the amendment be vacated and an entirely new EIS prepared.
- As a result, the agency should create and analyze an alternative that does not include cutting trees over 21" DBH.
- Large Tree Management is proposed to be limited to 10 units. Please disclose in more detail the acres of those units and the amount of large trees planned for cutting. We may be supportive of limited and judicious use of girdling and/or fire to create snags.
- ***Please develop an Alternative in the upcoming EA that does not include the use of the Amended Eastside Screens.***

It's possible that some elements of the Preliminary Environmental Assessment may not have been updated from earlier reports. We understand how that may occur in a large document.

Large trees and old trees are very ecologically important for our forests and it is important that they will be protected from logging within this project.

Treatment in MA-15 Old Growth Management Areas

Table 11 of the Silviculture Report indicates no commercial logging in MA-15 old Growth Management Areas. We appreciate this. Thank you.

Commercial and Noncommercial Thinning

- We appreciate a specific focus on less intensive actions in wildlife habitat connectivity corridors.
- We enthusiastically support following up thinning with landscape/broadcast prescribed fire.
- We request that silvicultural prescriptions for patch cuts::





- are smaller acreage, sinuous in shape, with snags throughout;
- are a sinuous shape with irregular borders to enhance the “edge effect” benefits;
- include landscape burning following any patch cuts;
- include creating snags in created openings either by girdling or prescribed fire;
- include a maximum acreage of 2.5 acres rather than 5 acres..
- We recommend adopting a prescription similar to that used in the Sheep Creek Vegetation Management Project: Patch Opening for Habitat Enhancement (HBT ENHANCE) treatment creates biologically appropriate conditions for dry forest avian focal species by maintaining all large trees and snags, promoting the development of early seral species with wide spacing and creation of openings (up to approximately 2.5 acres in size) to create grassy areas for foraging. This treatment also includes skipped areas (SKIP) of approximately 1-2 acres where no treatment would occur enhancing canopy diversity and providing patches of wildlife hiding cover within treatment units.

Treatments in Riparian Habitat Conservation Areas

- During scoping, our understanding was that treatments will be limited to areas above open roads that already exist within RHCAs. Please specify that this protection/limitation is being carried forward. We don't support the planned commercial removal of material from RHCAs in the project, especially in areas with substantial cattle grazing. Leaving material - especially larger material - can assist in attainment of Riparian Management Objectives and can help discourage access by cattle to the riparian area.
- Please analyze the potential to utilize woody material to benefit fish habitat and hydrology by placing woody material in-stream in strategic locations.
- Please review the approach that the Whitman Ranger District applied on the Little Dean project. The project included:
 - actively surveying to identify pockets of surviving broadleaf native riparian shrubs and trees;
 - specifically designing limited and targeted treatments to benefit those native riparian hardwoods;
 - considering the potential for increased access to riparian areas by cattle resulting from riparian forest thinning;
 - mitigating to reduce potential damage from increased grazing;
 - monitoring the results during and after project implementation.

Temporary Roads

- There are 10.75 miles of temporary road construction planned, in addition to the re-opening and use of currently closed and non-system roads. This is a substantial footprint. 5.35 miles of these temporary roads would be “new” indicating they are not on old templates from past skid roads, etc.
- We advocate for eliminating unneeded or redundant roads, utilizing existing roads, and avoiding the use of temporary roads altogether. We encourage the Forest Service to consider an approach to meet the project's objectives without constructing any temporary roads, especially if they would be built to access previously unlogged forests. Please consider treating areas by hand thinning rather than constructing temporary roads.
- We do appreciate that in recent projects on the La Grande Ranger District the Forest Service has proposed to minimize temporary roads, locate them on existing templates, and restore them afterward. We encourage a similar approach here.

Road Densities





Tables 5 and 6 in the Road Density Section of Appendices-4 show multiple places where road densities exceed Forest Plan guidelines. While open roads are needed for public access and Forest Service management activities, excessive road densities cause problems for a variety of ecosystem values including elk security and fish and wildlife habitat. Please use the project as an opportunity for strategic road management to benefit fish, wildlife and clean waters in creeks.

Undeveloped Lands

Approximately 13,590 acres of undeveloped lands exist within the project area. Although past management activity and older roadbeds are reported to exist within these areas, their “undeveloped” characteristics provide benefits for fish and wildlife habitat, elk security, solitude, wildlife viewing and quality hunting experiences. Although the existence of roads in the area may comprise some of these values, it also elevates the need for travel management to protect these values. Approximately 3,048 acres of these “other undeveloped lands” are proposed for commercial logging. Please evaluate the potential to enhance the undeveloped nature of these lands and avoid impacts from the project that would detract from their natural values. It’s likely that the undeveloped lands provide important elk security areas. Please consider dropping logging units in undeveloped lands that would impact elk security areas or previously unlogged forests. Please do not construct new temporary roads in undeveloped lands. Please drop any commercial logging units in undeveloped lands that require construction of temporary roads.

Aspen and Wet Meadow Enhancement

We support this work. Thank you for including it.

Steep Slope Logging

- Approximately 348 acres are slated for “Commercial Harvest Skyline/ Tethered” logging systems.
- We do not support the use of tethered logging for this project. Tethered logging would use ground-based logging equipment on steep slopes. Steeper slopes are more vulnerable to soil compaction, rutting, and soil displacement. Steeper slopes are at a higher risk of water runoff and soil erosion due to ground disturbance from logging equipment.
- We request that steep slopes will not be commercially logged in the project. Logging on steep slopes in riparian areas raises particular concern.
- Cable/skyline logging is permitted for logging on steeper slopes by the Wallowa-Whitman National Forest Land and Resource Management Plan. Cable or skyline logging does result in impacts to the soil, however the results are less detrimental to soils than those of ground-based equipment according to research and monitoring efforts.

Whitebark Pine (WBP)

We appreciate that botanists have surveyed WBP in the project area and that Botany PDCs account for management actions around WBP across age classes.

Strategic Fuel Breaks

Historic fire suppression is often cited as the cause of problems associated with the forests of the Wallowa-Whitman National Forest. Reintroduction of fire is perhaps the most important solution to the effects of past fire suppression, yet beneficial fire use remains under-utilized. Implementation of beneficial fire use remains challenging. However, we are optimistic that well-planned strategic fuel reduction treatments may set the stage for the increased use of beneficial fire.





We believe that fuel-reduction treatments are most effective in limited and strategic locations. Fuel-reduction thinning treatments must also be followed by controlled fire for best effectiveness. Fuel-reduction treatments are not appropriate in un-roaded and remote forest areas.

We encourage the Forest Service to allow fire to burn naturally on the landscape when conditions are appropriate for safety and for forest ecology. The creation of strategic fuel breaks may provide opportunity for fire crews to safely utilize beneficial fire use in the event of a future wildfire. As noted above, this may enable tactics such as burn outs as part of wildfire management, increasing the opportunity for beneficial fire use on the National Forest.

It's also essential that fuel reduction treatments are planned to avoid wildlife connectivity corridors and important closed canopy habitats, particularly those found in moist forest habitats. It's also important to recognize that creating fuel breaks along roads reduces elk security by increasing their visibility from these roads. This creates the need to protect larger quality elk security areas away from roads treated as fuel breaks. Protecting the most fire-resistant trees (early seral tree species as well as large and old trees of all species) is also an important element. Again, we advocate that the Forest Service protect all trees 21 inches DBH and larger and all old trees on this project.

With these important caveats in mind, we support limited fuel breaks utilizing limited and strategic concepts such as potential operational delineations (PODs), potential control lines (PCLs), and defensive fuels profile zones (DFPZs). We stress that our support for these concepts is in contrast to an unrealistic approach to "fireproof" the forest with widespread fuel reduction projects. As we noted above, it is well-established that the main driver of severe wildfires is not increased fuel loading, but rather climate change and weather events (Keyser, A, A Westerling. 2017. *Climate drives inter-annual variability in probability of high severity fire occurrence in the western United States. Environ. Res. Lett.* 12 065003).

As described in the project Fuels Report, "These treatments would not be designed to stop a wildfire by themselves but would provide suppression forces a higher probability of successfully attacking a wildfire with indirect suppression tactics such as 'burn outs.' "

Since fire suppression (combined with historic logging) has been a major cause of concern for our forests, reintroduction of fire is a necessary part of the solution.

Prescribed Fire

We appreciate the Forest Service including plans to implement prescribed fire across the project area. We very much support this approach as an important part of forest restoration, and would like to see follow-up landscape/broadcast burning across the project, including as a follow-up after the piles are burned.

Bald Angel Closure Area

The project contains part of the Bald Angel Closure Area providing additional security for elk and deer. Please assure full compliance with all aspects of the Bald Angel vegetation project Decision Notice regarding Access and Travel Management and Area Closures.

The Bald Angel Decision Notice can be seen here:

<https://scholarsbank.uoregon.edu/server/api/core/bitstreams/b54d2f24-a710-4e06-9629-0a04a6dc6ac3/content>





In Closing

Thank you for the opportunity to comment on this project and for hosting an open house and field trip during scoping. We appreciate the Forest Service efforts to inform the public about this project. Please let us know if you have any questions.

Sincerely,

Brian Kelly

Brian Kelly, Senior Advisor
Greater Hells Canyon Council
PO Box 607
Enterprise, OR 97828
brian@hellscanyon.org

Jamie Dawson

Jamie Dawson, Conservation Director
Greater Hells Canyon Council
PO Box 607
Enterprise, OR 97828
jamie@hellscanyon.org

