Natural Resources
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November 10, 2026

Jeremy Aujero, Whitman District Ranger
Whitman Ranger District
1550 Dewey Avenue, Suite A
Baker City, OR 97814

Re: Whitman Post-Fire Recovery Project

Submitted via: https://www.fs.usda.gov/r06/wallowa-whitman/projects/446982

Dear Ranger Aujero,

Baker County appreciates the opportunity to comment on the Whitman Post-Fire Recovery Project. The County commends the Forest Service on using emergency authority to take quick action to reduce post-fire risks to our communities and citizens. Baker County supports the Whitman Post-Fire Recovery Project in general, however, there are several concerns that we would like to be addressed. Below you will find the County's comments and recommendations.

Purpose and Need
Baker County fully supports the Purpose and Need of the project. County government's authorities include providing for the health, safety, well-being, and economic sustainability to its citizens. By addressing hazard trees, reducing susceptibility to insect-related mortality, restoring access, and providing for economic benefits, this project aligns with the County's obligations to its citizens.

Proposed Action
Timber Harvest (755) acres.
The County encourages the Forest Service to substantially increase the number of timber harvest acres to the maximum extent allowed through the Categorical Exclusion (CE). Because this project includes (3) post-burns, the total allowed through the CE should be 1000 acres. Would it be more environmentally and economically beneficial to separate each fire into a separate project to allow 1000 acres of CE timber harvest?

Process-Based Restoration (4 stream miles).
Before beginning reconnecting streams with floodplains, adding beaver dam analogs (BDAs), or post assisted log structures (PALs), the County requests that current water use is evaluated and if any of these actions will reduce flow, then do not include them in the restoration. The County's economy is driven by water use for crops, livestock, and municipalities. Any loss to flow volume

will negatively impact our economic viability. In addition, multiple-use of waters by recreationists, grazers, and miners must be taken into account when stream reconstruction is being proposed.

The County discourages any use of fencing, even temporary fencing, to promote riparian vegetation to aid with sediment deposition. Instead, consider using brush fence above and around the activity site to hinder access to new vegetation by ungulates. A brush fence is a natural, eco-friendly barrier made by placing branches, brush, and other plant material in a way that creates a permeable, biodegradable screen that can serve as a windbreak, access deterrent, and wildlife habitat. It is low-cost as the materials are readily available as it will put some of the slash pile material to good use and will not entrap deer and elk like barbed wire fencing does.

Temporary Road Construction and Removal (.89 miles)
Baker County supports temporary roads to ensure access to areas that are currently inaccessible to promote project success. When the project is complete, instead of decommissioning the road, consider the temporary road as a non-maintained road. Because WWNF is an open forest, users often see barriers as obstacles to go around so placing barriers is a waste of time and money. Proceed with recontouring, installing water bars, seeding, and especially spreading slash, but avoid putting up a physical barrier at the entrance.

Trail Maintenance, Reconstruction, and Realignment (12 miles)
The County fully supports trail maintenance, reconstruction, and realignment. Tourism is a large economic driver, and well-maintained trails provide access to an entire spectrum of outdoor recreation.

Post-Fire EA Additional PDCs

Project Design Criteria (PDC)	Recommendations
TES-14	The TES sections discussing snags is concerning. It appears that activities are focused on snags and are not restoring the overall balance of structural stages. A balance of age classes supports habitats and forest health better than a predominantly old-age forest. While the County acknowledges the retention of all trees/snags >30" dbh and identified as old trees/snags is better than the Eastside Screens, the management still has the hint of the arbitrary 21" rule that has haunted good forest management for decades. Any tree, in any location, that exhibits insect or disease, is not suitable for the site, or is unsafe for general forest users, should be removed regardless of the dbh.
V-4	See TES-14 comment above.

There is no mention of post-fire actions to protect the municipal water supply for the City of Sumpter. Will this be a separate project?

Also missing is forage management/restoration. Will the Forest Service be reseeding the entirety of the 19, 280 acres to reduce erosion and provide forage for wildlife? In the past, burned areas have responded well to double seeding the headwalls with the inclusion of winter wheat. The wheat comes up rapidly providing immediate micro-climates for other grasses and forbs to establish, is not invasive, and provides forage for wildlife and birds.

Will trees be fell on contour to provide additional erosion control? Sediment transport through overland and rill erosion is a concern in that steep terrain. If soils can be held on the slope, it will reduce the amount of treatments needed to protect riparian areas and streams.

Baker County stands ready to partner with, and support, the Forest Service in all projects. Although the Whitman Post-Fire Recovery Project does not require NEPA public input, local government knows the areas' and citizens' needs well.

Thank you for this opportunity to comment. Please, do not hesitate to contact us.

Best Regards,

Shane M. Alderson, Commission Chair

Christina Witham, Commissioner

Michelle Kaseberg, Commissioner

Doni Bruland, Natural Resources Coord.