PUBLIC COMMENT REGARDING WHITMAN POST-FIRE RECOVERY PROJECT

To: Whitman Ranger District, Wallowa-Whitman National Forest, U.S. Forest Service
Re: Whitman Post-Fire Recovery Project, No. 446982
Subject: Conservation, Ecological Restoration, and Adequacy of Environmental Review

Dear District Ranger:

I submit these comments concerning the proposed Whitman Post-Fire Recovery Project, involving approximately 7,402 acres affected by the Anthony, Olive Butte, and McCully wildfires during the 2026 fire season.

I support responsible post-fire recovery measures that protect human safety, restore watershed function, improve ecological resilience, and conserve the wildlife habitat and natural resources of Oregon's national forests. However, I am concerned that extensive commercial salvage logging and associated road construction could undermine those objectives if authorized without adequate site-specific analysis and enforceable environmental safeguards.

I respectfully request that the Forest Service carefully distinguish between necessary hazard mitigation and ecological restoration, on the one hand, and timber harvesting undertaken primarily to recover commercial value, on the other. Each activity should be evaluated according to its actual environmental effects and demonstrated contribution to long-term forest health.

I. My Personal Connection to Oregon's Forests

I own approximately 286 acres of forestland along Cow Creek near Riddle, Oregon, where I spend substantial portions of the year. My property lies within an interconnected landscape of private forestlands and federally managed public lands.

I hike, camp, paddle, birdwatch, observe wildlife, and photograph Oregon's forests and waterways. I also actively manage my property through hazardous fuel reduction, protection of water resources, erosion management, habitat stewardship, and ecological restoration.

Although my property is in southwestern Oregon rather than the Wallowa-Whitman National Forest, the management principles underlying this proposal are directly relevant to my experience as a forestland owner and steward.

I understand that forests require management. I recognize the importance of reducing hazardous fuels, maintaining safe access, protecting infrastructure, and restoring damaged ecological functions.

I also understand that forest recovery is complex. The removal of trees or vegetation may be appropriate in some circumstances but harmful in others. Effective stewardship requires attention to soil, water, wildlife, natural regeneration, and the long-term effects of management decisions.

My support for forest conservation is not an objection to all logging or active management. It reflects a belief that management decisions on public lands should be guided by scientific evidence, ecological necessity, and the long-term public interest.

II. Post-Fire Forests Remain Ecologically Valuable

One of my principal concerns is the tendency to treat severely burned forests as landscapes requiring extensive timber removal before recovery can occur.

A forest affected by wildfire is not necessarily an ecologically destroyed landscape.

Standing dead trees, fallen logs, surviving vegetation, and naturally regenerating plant communities can provide important ecological functions during post-fire succession.

Standing dead trees, commonly referred to as snags, provide nesting, roosting, and foraging habitat for numerous wildlife species. Downed wood contributes to soil processes, moisture retention, nutrient cycling, and habitat complexity.

The retention of some fire-killed trees can therefore be an important component of ecological recovery.

I recognize that not every dead tree should remain standing. Trees presenting demonstrable hazards to roads, recreation facilities, or other areas of concentrated human use may need to be removed.

However, those circumstances should not be used to justify broadly removing fire-killed trees from areas where they do not present comparable safety risks.

I request that the Forest Service establish scientifically supported snag-retention and downed-wood standards appropriate to the affected forest types and wildlife species.

Those standards should be reflected in enforceable project design criteria and incorporated into individual treatment prescriptions.

III. Commercial Salvage Logging Should Be Evaluated Separately From Necessary Hazard Mitigation

The project includes salvage harvest, roadside danger-tree removal, and other recovery activities.

These activities do not necessarily have the same objectives or ecological consequences.

Removing a demonstrably hazardous tree immediately adjacent to a public road differs materially from conducting commercial harvest across a large burned forest stand.

Similarly, repairing a damaged drainage structure differs from constructing or reopening roads to access merchantable timber.

The environmental review should distinguish among these activities rather than treating them collectively as necessary components of post-fire recovery.

For each proposed salvage unit, the Forest Service should identify:

1. The specific ecological, safety, or economic objective.
2. The acreage proposed for treatment.
3. The extent and severity of tree mortality.
4. The anticipated timber volume and commercial value.
5. The expected effects on soil, water, vegetation, and wildlife.
6. The roads and access routes necessary for implementation.
7. The alternatives considered, including no commercial harvest.

Where harvesting is justified principally by timber recovery, the Forest Service should identify that objective expressly and evaluate its environmental costs independently of safety-related work.

Public safety should not be used as a generalized justification for harvesting beyond the area reasonably necessary to address identifiable hazards.

IV. Site-Specific Environmental Analysis Is Essential

I am particularly concerned about the project's reliance upon a nationwide Post-Fire Recovery Environmental Assessment.

A national analysis can provide useful scientific context, establish general management principles, and identify recurring environmental issues.

However, it cannot, by itself, fully account for every important local characteristic of a specific burned forest.

Conditions vary substantially across the national forest system, including topography, soils, vegetation, precipitation, wildlife populations, watershed conditions, and the intensity and ecological effects of wildfires.

Even within a single fire perimeter, environmental conditions can vary considerably.

The Whitman project encompasses multiple fire areas across a mountainous landscape. Treatment decisions should therefore be supported by site-specific information sufficient to evaluate their environmental consequences.

I request that the Forest Service disclose the geographic location and acreage of proposed treatments, including maps showing salvage units, road work, stream corridors, sensitive habitats, and areas where natural regeneration will be retained.

The agency should also explain which effects have already been adequately analyzed in the national assessment and which require additional project-specific evaluation.

Where the available analysis does not adequately address potentially significant effects, the Forest Service should undertake supplemental analysis or prepare an Environmental Impact Statement, as required by NEPA.

The objective should be a defensible, transparent decision based upon the actual environmental conditions of the affected landscape.

V. Watershed Protection and Soil Conservation Must Be Primary Considerations

My experience maintaining water resources and managing erosion on my own property has reinforced the importance of protecting watersheds.

Post-fire landscapes can be particularly vulnerable to erosion, sediment movement, and changes in runoff.

The extent of those risks depends upon burn severity, soil characteristics, slope, vegetation recovery, precipitation, and disturbance from subsequent management activities.

Heavy equipment, new or reopened roads, skid trails, and removal of vegetation or woody material may aggravate erosion under certain conditions.

Such impacts may extend downstream into waterways and aquatic habitat.

I therefore request that the Forest Service:

- Identify streams, riparian areas, wetlands, and sensitive watershed features within proposed treatment areas.
- Establish site-specific riparian protection measures and equipment-exclusion areas where appropriate.
- Minimize construction of new roads and avoid unnecessary reopening of closed roads.
- Evaluate soil compaction, slope stability, and erosion risks before ground-based operations.
- Use appropriate seasonal restrictions and soil-protection measures.
- Rehabilitate disturbed areas and decommission temporary access routes promptly.
- Establish monitoring sufficient to identify and correct adverse effects on water quality and soil stability.

Watershed restoration should be evaluated on its own merits, rather than presumed to be a consequence of commercial timber removal.

Where natural regeneration and retention of downed material provide adequate protection, those approaches should receive serious consideration.

VI. Wildlife Habitat and Ecological Connectivity Must Be Preserved

Wildlife habitat is an important component of my personal connection to Oregon's forests.

Through birdwatching, wildlife observation, and nature photography, I have developed a strong appreciation for the diversity of habitats that support forest species.

Burned forests can provide habitat conditions that are uncommon in unburned forests, including standing dead trees, openings supporting early-successional vegetation, and structurally diverse combinations of living and dead vegetation.

These conditions may benefit certain bird species, insects, and other organisms.

The Forest Service should therefore evaluate post-fire wildlife habitat according to the particular species and ecological conditions present, rather than assuming that timber removal necessarily improves habitat.

Before approving salvage units, I request surveys or appropriately supported habitat assessments for sensitive species and other resources potentially affected by proposed treatments.

The analysis should consider nesting habitat, snag availability, downed wood, riparian corridors, habitat connectivity, and cumulative disturbance from overlapping operations.

Where treatment could substantially degrade important habitat, the Forest Service should modify or eliminate the proposed harvest or establish enforceable retention requirements.

VII. Natural Regeneration Should Be Considered Before Reforestation or Intensive Intervention

I support reforestation where it is ecologically appropriate and necessary to achieve desired recovery objectives.

However, planting trees is not automatically preferable to natural regeneration.

Many forest ecosystems possess substantial capacity for natural recovery following wildfire.

The appropriate approach depends on surviving seed sources, species composition, soil conditions, climate, burn severity, and management objectives.

Before prescribing planting or intensive vegetation treatments, the Forest Service should assess the likely success of natural regeneration and identify the conditions under which intervention would provide a meaningful ecological benefit.

Reforestation should emphasize native species appropriate to the site and account for future climatic conditions, drought susceptibility, and ecological diversity.

The objective should be restoration of resilient forest ecosystems, not merely rapid establishment of commercially desirable tree cover.

VIII. Public Safety and Appropriate Hazard Reduction Are Legitimate Objectives

I recognize that wildfire can leave dangerous conditions along roads, trails, campgrounds, and other locations used by the public.

Dead or structurally compromised trees may present falling hazards, and damaged infrastructure may require prompt repair.

I support targeted actions necessary to address those conditions.

However, hazard-tree removal should be based upon documented risks and limited to the geographic area reasonably necessary to protect people and infrastructure.

The Forest Service should clearly identify the locations of hazard treatments, the standards used to determine which trees require removal, and any opportunities to retain ecologically valuable wood safely.

Where appropriate, felled trees could be retained on site to contribute to habitat and soil protection rather than automatically removed as commercial products.

I also support fuel treatments that are scientifically appropriate to local conditions and compatible with ecological restoration.

Prescribed fire, selective thinning, and other treatments may contribute to long-term resilience when applied thoughtfully.

The analysis should distinguish treatments intended to reduce future fire risk from activities undertaken primarily for timber recovery.

IX. Commercial and Socioeconomic Claims Require Meaningful Supporting Evidence

I recognize that timber harvesting can provide employment, support local contractors, and generate economic benefits for forest-dependent communities.

These considerations are legitimate elements of public-land management.

However, economic benefits should be evaluated alongside ecological costs, recreational impacts, and long-term restoration obligations.

The national Post-Fire Recovery assessment's socioeconomic discussion has been criticized for relying substantially on qualitative analysis and broad national economic data rather than project-specific estimates.

For the Whitman project, I request disclosure of the anticipated commercial timber volume, estimated recovery value, treatment costs, road-construction and rehabilitation costs, and projected economic benefits.

The agency should distinguish national economic statistics from benefits reasonably attributable to this project.

The analysis should also consider whether salvage operations could impose costs through road deterioration, erosion control, recreation disruption, habitat mitigation, and subsequent restoration.

Where commercial timber value is cited as a reason for expedited harvesting, the Forest Service should explain how the expected timing of operations relates to the deterioration of fire-killed timber.

The justification for removing trees should not be presented as an ecological necessity merely because there is an opportunity to recover timber value.

X. Recreation and Scenic Resources Should Be Protected

Hiking, camping, paddling, birdwatching, and photography are among the reasons I place such importance on Oregon's public lands.

These activities depend upon more than access alone.

They depend upon the quality and ecological character of the surrounding landscape.

Post-fire forests can be visually striking and ecologically interesting, even when they appear dramatically different from their pre-fire condition.

Extensive salvage logging, road construction, equipment operations, and removal of standing dead trees may substantially change that experience.

The national assessment acknowledges that some post-fire harvest operations can produce openings resembling clear-cuts and that road conversions may affect existing trail opportunities.

I request that the Forest Service identify affected trails, recreation routes, viewpoints, and dispersed recreation areas within the Whitman project.

The environmental review should assess temporary closures, potential long-term access changes, scenic impacts, and the effects of converting roads used for recreation into active timber-hauling routes.

The agency should also explain how recreational resources will be restored or protected following project implementation.

XI. Cultural Resources and Tribal Consultation Require Site-Specific Attention

The national Post-Fire Recovery assessment acknowledges limitations in the completeness of cultural resource inventories across National Forest System lands.

This is an important issue when considering ground-disturbing activities.

Road construction, mechanical harvesting, and other soil-disturbing operations can affect archaeological sites, historic resources, and places of cultural significance.

I request that the Forest Service ensure that appropriate cultural resource identification and review occur before ground-disturbing activities are authorized or implemented in potentially sensitive locations.

The agency should also carry out appropriate government-to-government consultation with affected Tribes and address relevant treaty rights, traditional cultural resources, and Tribal concerns.

Generalized nationwide outreach should not be treated as a substitute for consultation concerning particular lands and resources.

XII. Emergency Procedures Should Not Eliminate Meaningful Scientific Accountability

The Forest Service identifies the Whitman project as proceeding under a Forest Health and Fuels Emergency Situation Determination.

I understand that this designation affects the applicable administrative review process, including the availability of project-level pre-decisional objections under 36 C.F.R. Part 218.

I also recognize that timely action may be necessary when fire-damaged trees present hazards or important restoration opportunities exist.

However, expedited procedures do not eliminate the need to comply with applicable environmental laws or to establish an adequate factual basis for agency decisions.

In particular, I request that the Forest Service explain how reliance upon the national environmental assessment will provide sufficient information to support project-specific findings concerning environmental effects.

The agency should disclose the analysis and mitigation measures upon which it intends to rely and provide meaningful opportunities for public consideration of site-specific information.

Where uncertainty remains concerning potentially significant impacts, the agency should not rely solely upon generalized conclusions from the national assessment.

XIII. Requested Agency Action

For these reasons, I respectfully request that the Forest Service:

1. **Prioritize ecological restoration and public safety** over commercial timber recovery when establishing project objectives and treatment prescriptions.
2. **Provide site-specific environmental analysis** identifying salvage units, road work, sensitive resources, treatment prescriptions, and expected environmental consequences.
3. **Evaluate a meaningful conservation-oriented alternative** emphasizing targeted hazard reduction, watershed restoration, natural regeneration, limited ground disturbance, and retention of ecologically valuable dead wood.
4. **Establish enforceable snag-retention and downed-wood requirements** based upon the ecological needs of affected forest types and wildlife species.
5. **Protect watersheds and soils** through appropriate riparian buffers, restrictions on ground-disturbing equipment, road limitations, erosion controls, and monitoring.
6. **Minimize new road construction** and require timely rehabilitation or decommissioning of temporary access routes.
7. **Evaluate wildlife habitat and ecological connectivity**, including the cumulative consequences of salvage operations across the affected fire areas.
8. **Assess natural regeneration before prescribing intensive reforestation**, using native species and site-specific ecological objectives where planting is warranted.
9. **Disclose project-specific economic information**, including timber volumes, anticipated revenues, treatment costs, road costs, and restoration obligations.
10. **Protect recreational and scenic resources** and assess potential effects on trails, dispersed recreation, public access, and landscape character.
11. **Complete appropriate cultural resource review and Tribal consultation** before implementing potentially damaging ground-disturbing activities.

12. **Undertake additional NEPA analysis, including an Environmental Impact Statement if required**, where the national assessment and project-level information are insufficient to support a reasoned determination concerning potentially significant environmental effects.

XIV. Conclusion

My experience owning and managing forestland along Cow Creek has convinced me that responsible stewardship requires both practical management and restraint.

I understand the need to address dangerous trees, restore damaged roads and waterways, reduce hazardous fuels, and support communities affected by wildfire.

But I also recognize that healthy forest ecosystems are complex and that the ecological consequences of management decisions can extend far beyond the immediate treatment area.

A burned forest is not simply a collection of damaged commercial trees. It is a living ecological system undergoing change and recovery.

The standing dead trees, soils, surviving vegetation, natural regeneration, wildlife habitat, and watershed processes within that landscape deserve careful consideration before extensive intervention occurs.

I urge the Forest Service to ensure that the Whitman Post-Fire Recovery Project is guided by sound science, meaningful site-specific analysis, and the long-term conservation of public resources.

Appropriate recovery measures should move forward where their benefits are demonstrated and their environmental impacts are adequately addressed. More extensive commercial salvage operations should not be approved merely because timber remains economically recoverable.

Oregon's national forests are a public inheritance. Decisions affecting their recovery after wildfire should reflect a responsibility to protect their ecological integrity for future generations.

Thank you for considering these comments.

Respectfully submitted,

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Submitted in Individual Capacity