GREATER HELLS CANYON COUNCIL

September 12th, 2026

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

Submitted electronically at https://cara.fs2c.usda.gov/Public/CommentInput?Project=446982

RE: Whitman Post-Fire Recovery Project

Dear Mr. Aujero,

I am writing on behalf of Greater Hells Canyon Council (GHCC) to the Wallowa-Whitman National Forest ("agency") regarding the Whitman Post-Fire Recovery 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. Our staff, board, and members recreate in and know the project area well.

Generally speaking, GHCC supports activities that will restore safe access and enhance ecological processes, and recognizes that local communities in our region can benefit economically from this work. Achieving all of these goals is possible with a balanced and intentional approach. However, after reviewing the limited documentation provided, we have serious concerns about the proposed action.

Our concerns are summarized as:

By relying on emergency authority and the Post-Fire Recovery EA, the agency unnecessarily reduced meaningful public participation.
The agency is relying on newer authorities which allow a substantially shortened public engagement window and process. They should make a good faith effort to explain, in plain language, what that means for the public and what they should expect.

A 7-day comment period is inappropriate for a project that has obviously garnered significant public interest, and the public was not provided with enough information to give useful feedback. Between the lack of detail in the documents and the incredibly short comment period, the agency has effectively precluded any meaningful public participation.

The agency has failed to complete necessary site-specific evaluation.
In the Determination of Analysis Reliance document, the agency is relying in full on the national Post-Fire Recovery Environmental Assessment which explicitly requires site-specific evaluation. No site-specific analyses appear to have been done.

The agency has failed to disclose the presence of Inventoried Roadless Areas within the project area. IRAs are located within the project area and within proposed treatment areas, but this is not included in maps or disclosed anywhere in the documentation. This would be covered in site-specific analysis. Removal of trees and building temporary roads to access those trees for several of the project's stated purposes are not compatible with the 2001 Roadless Area Conservation Rule. If the agency wishes to include IRAs in proposed treatment units, it will need to amend any proposed

treatments to comply with the Roadless Rule and forest plan. This is affirmed by the post-fire EA, which states: “harvest, road building, and other post-fire activities would be allowed only where permitted by the land management plan, statute, or regulation.”

The agency has failed to disclose and/or analyze impacts on Endangered Species Act and critical habitat. The project area overlaps with designated critical habitat for listed species. The post-fire EA outlines numerous requirements for actions that intersect critical habitat. It’s not clear if or how the agency has fulfilled those requirements aside from a few limited mentions in the PDCs. Was consultation and a BE/BA completed, or does the agency intend to do so? Please disclose.

The agency has failed to comply with the Eastside Screens and other forest plan conditions. While we appreciate several of the ecologically-oriented PDCs that were included in the appendix, the proposed action appears to be violating the Eastside Screens, including the snag and green tree requirements as amended in 2021.

Conclusion
We request that the agency complete and circulate for comment an updated EA with the required site-specific analyses and adjustments to bring the proposed action into compliance with the forest plan and other relevant regulations.

Thank you for the opportunity to provide comments on the Whitman Post-Fire Recovery Project. Please feel free to contact us with any questions.

Sincerely,

Jamie Dawson

Jamie Dawson
Conservation Director
Greater Hells Canyon Council