BlueRibbon Coalition
800 W Main St Suite 1460
Boise, ID 83702
208.237.1008
brc@blueribboncoalition.org

Ben Burr, Executive Director
800 W Main St Suite 1460
Boise, ID 83702

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Jeremy Aujero, District Ranger
Whitman Ranger District, Wallowa-Whitman National Forest
1550 Dewey Avenue, Suite A
Baker City, OR 97814

Dear District Ranger Aujero:

BlueRibbon Coalition (BRC) submits these comments on the Whitman Post-Fire Recovery Project on the Whitman Ranger District of the Wallowa-Whitman National Forest. BRC is a national non-profit organization that champions responsible recreation and encourages a strong conservation ethic and individual stewardship. We champion responsible use of public lands and waters for the benefit of all recreationists by educating and empowering our members to secure, protect, and expand shared outdoor recreation access and use by working collaboratively with natural resource managers and other recreationists. Our members use motorized and non-motorized means of recreation, including OHVs, horses, mountain bikes, and hiking to enjoy federally managed lands throughout the United States, including those managed by the Forest Service. Many of our members and supporters live near public lands or travel across the country to visit them and use motorized vehicles to access National Forest System lands. BRC members visit these areas for motorized recreation, sightseeing, photography, hunting, wildlife and nature study, camping, and other similar pursuits. We would like to add our support to any comment submitted by any other individuals or organizations that

advocate for motorized use and increased recreation access overall. BRC members and supporters have concrete, definite, and immediate plans to continue such activities in the future.

BRC supports the project. It proposes post-fire recovery activities on about 7,400 acres within the Anthony, Olive Butte, and McCully fires, which together burned about 19,280 acres in the 2026 fire season. The proposal includes salvage harvest on 755 acres, tree planting on 6,942 acres, maintenance and reconstruction of 34 miles of road, 12 miles of trail work, and 4 miles of stream restoration. BRC asks the Forest Service to make the following changes in the decision:

- **Reopening.** State in the decision the date by which each burned-area road and trail reopens, make every closure order expire on a stated date, and reopen routes one at a time as each is made safe.
- **Hazard trees and roads.** Schedule hazard tree removal and road maintenance on the 34 miles of road and 12 miles of trail first, and complete it before the 2027 summer recreation season.
- **Salvage.** Expand salvage harvest beyond 755 acres to the merchantable fire-killed timber that the forest plan allows to be harvested, including in the Anthony Fire, and offer the sales promptly.
- **Temporary roads.** Keep any temporary road the project builds in the transportation system instead of decommissioning it.
- **Volunteers.** Use volunteer and partner agreements with local groups for road and trail work, and do not require those groups to carry insurance.

BRC Supports Using the Emergency Authority and the National Post-Fire Recovery EA

The project relies on the national Post-Fire Recovery Environmental Assessment, PFREA-USDA-FS-062026, and proceeds under a Forest Health and Fuels Emergency Situation Determination under section 40807 of the Infrastructure Investment and Jobs Act, 16 U.S.C. § 6592c. BRC supports both. The emergency authority lists removal of hazardous trees in close proximity to roads and trails among the actions it covers, and it exempts the project from the pre-decisional objection process in 36 C.F.R. part 218. The national EA states that fire-killed timber loses merchantable value within 1 to 2 years (EA p. 23), so a process that avoids a long delay is what the resource requires. BRC asks the Forest Service to use the full speed that the authority allows, from the decision through implementation.

Reopen the Burned-Area Roads and Trails on a Fixed Schedule

The Forest Service has issued area closures for the Anthony Fire and the McCully Fire. The public lost access to these areas when the fires burned, and the project decision is where the Forest Service sets the date the public gets it back. The national EA leaves the line “Specify when implementation is expected to occur” blank in each activity card for the project to fill in (EA pp. 40–57). This decision should fill it in with dates. BRC asks the Forest Service to adopt these rules in the decision:

- A road or trail open to the public before the fire is presumed to reopen. Each closure order states an expiration date, and any renewal rests on a written finding of the specific hazard on that route.
- Routes reopen one at a time as each is made safe, not when work across all three fires is finished.
- Hazard tree removal along the 34 miles of road and 12 miles of trail is the first work scheduled and funded. The national EA already calls for removing dead and dying fire-impacted trees near roadways, up to 1,000 feet, where practicable (design criterion V-2, EA p. 69), so crews can work to a standard without re-surveying each tree.
- The decision document states a completion date for road maintenance, reconstruction, and hazard tree removal, and the district reports to the public when it meets or misses that date.

A date in a decision is a commitment that the public and the Regional Forester can hold the district to. Without one, the pace of recovery depends on the priorities of whoever holds each position in a given year. The Forest Service has shown that fast action can be done: the Wapiti Post-Fire Recovery Project on the Sawtooth National Recreation Area moved from a NEPA start date of July 23, 2026 to a decision on August 24, 2026.

Salvage More Than 755 Acres and Use the Sales to Pay for Access

The proposal salvages 755 acres, about 4 percent of the 19,280 acres that burned, in the McCully and Olive Butte fires, and none in the Anthony Fire. The national EA finds that post-fire timber harvest recovers economic value, supports local contracting, and removes dead and down material so that recreation and other permitted uses can return (EA p. 14), and that delay reduces receipts that contribute to county payments and restoration (EA p. 23). Congress has

authorized salvage harvest of fire-damaged timber stands (16 U.S.C. § 1611(b)). BRC asks the Forest Service to:

- Treat harvest of merchantable fire-killed and damaged timber as the default on suitable lands where the forest plan allows it, and explain in the decision record any merchantable timber left unharvested, including all of the Anthony Fire.
- Offer the salvage sales within 12 months of containment and package them so that local mills and contractors can bid.
- Require purchasers, through timber sale contract provisions, to maintain and reconstruct the haul roads they use, so that harvest helps reopen roads to the public without added appropriated cost, and use stewardship contracting to apply the value of timber removed to road and trail work.
- Use Good Neighbor Authority, 16 U.S.C. § 2113a, which the EXPLORE Act amended for recreation (Pub. L. 118-234, § 351), to let state and county partners perform restoration work.

Keep Temporary Roads in the Transportation System

BRC supports temporary road construction where it is needed to carry out the harvest and restoration the project proposes. BRC asks that the Forest Service keep each temporary road that provides public, administrative, or suppression access in the transportation system, instead of decommissioning it after use. Decommissioning costs more and disturbs the ground a second time, and retained roads serve as fuel breaks and control lines in the next fire. Congress contemplated that a road built for a timber contract can be retained when its necessity is set out in the forest development road system plan (16 U.S.C. § 1608(b)).

Use Volunteer Agreements for Road and Trail Work

The project includes 34 miles of road maintenance and reconstruction and 12 miles of trail maintenance, reconstruction, and realignment. Local groups can do part of that work. Congress found in the National Forest System Trails Stewardship Act that lack of trail maintenance threatens access to public lands and directed the agency to increase volunteer and partner trail maintenance (Pub. L. 114-245, §§ 2, 4). The EXPLORE Act rewrote the Volunteers in the National Forests Act as the Volunteers in the National Forests and Public Lands Act (Pub. L. 118-234, § 341; 16 U.S.C. §§ 558a–558g). Volunteers under that Act are treated as Federal employees for tort claims, workers' compensation, and claims for lost or damaged personal

property (16 U.S.C. § 558e), and the Act bars the Secretaries from requiring a cooperator or volunteer to carry liability insurance to provide the volunteer services it authorizes (16 U.S.C. § 558g).

BRC members who have tried to work with the Forest Service through volunteer agreements report that the cost of insurance and other administrative obstacles have greatly reduced the number of volunteer groups willing to continue. BRC asks the Whitman Ranger District to:

- Identify in the decision the road and trail segments that volunteer and partner groups may maintain, and sign agreements with local groups within 30 days of a request.
- Not require insurance of a volunteer or cooperator for services authorized under 16 U.S.C. §§ 558a–558g, and withdraw any local requirement that conflicts with § 558g.
- Accept chainsaw certifications from recognized trail and OHV organizations so that qualified volunteers can clear downed trees along the reopened routes.
- For work that does not fall within the Volunteers Act, accept the group's existing insurance coverage or provide coverage, so that cost does not decide whether a group participates.

Conclusion

BRC supports the Whitman Post-Fire Recovery Project and asks the Forest Service to strengthen the decision with dated reopening commitments for the burned-area roads and trails, hazard tree removal and road work first, a larger salvage harvest, retention of temporary roads, and volunteer agreements free of insurance barriers. Speed is the reason the emergency authority exists, and a dated schedule is how the district uses it.

We would like to close by saying we support "shared use". As long as overall visitation numbers are appropriate for the affected resources, motorized and non-motorized users can be compatible with one another so long as individual users understand designations and plan their activities accordingly. Indeed, motorized and non-motorized recreation use often overlap as OHVs often increase accessibility to non-motorized recreational activities such as hiking, camping, equestrian use, etc. We also hold that responsible recreational use of public lands can exist in harmony with ecosystem needs.

BRC would like to be considered an interested public for post-fire recovery actions that rely on this Environmental Assessment. Information can be sent to the following address and email address:

BlueRibbon Coalition
800 W Main St, Suite 1460
Boise, ID 83702
brc@blueribboncoalition.org

Sincerely,





Ben Burr
Executive Director
BlueRibbon Coalition

Simone Griffin
Policy Director
BlueRibbon Coalition

References

USDA Forest Service. June 2026. Post-Fire Recovery Environmental Assessment, PFREA-USDA-FS-062026.

USDA Forest Service. November 2026. Whitman Post-Fire Recovery Project, Project No. 446982, Whitman Ranger District, Wallowa-Whitman National Forest, project page.

Baker City Herald. November 6, 2026. Forest Service proposing salvage logging in burned areas. Elkhorn Media Group. November 2026. Public comments accepted on Whitman Post-Fire Recovery Project.

USDA Forest Service. 2026. Wapiti Post-Fire Recovery Project, Sawtooth National Recreation Area, project page (NEPA start July 23, 2026; decision August 24, 2026).

Emergency actions, 16 U.S.C. § 6592c (Pub. L. 117-58, div. D, § 40807); 36 C.F.R. part 218.

Volunteers in the National Forests and Public Lands Act, 16 U.S.C. §§ 558a–558g (Pub. L. 118-234, § 341).

National Forest System Trails Stewardship Act, Pub. L. 114-245 (2016).

EXPLORE Act, Pub. L. 118-234, § 351; 16 U.S.C. §§ 1608, 1611(b), 2113a.