Data Submitted (UTC 11): 10/3/2025 4:15:14 PM

First name: Archie Last name: Chaffin Organization:

Title:

Comments: 1. Motorized Access Not Protected

Issue:

The plan fails to guarantee continued motorized access to roads and areas people have used for generations.

Add a desired condition that clearly states motorized access will be maintained forestwide for all residents throughout the life of the plan.

2. Cross-Country Travel Not Allowed

Issue:

Cross-country travel by ATV or pickup is no longer permitted, even where it's currently practiced.

Add a standard affirming that cross-country travel is permitted across the forest, unless restricted through a separate public Travel Management process.

3. Legacy Roads May Be Closed

Issue

The plan allows roads built before 1976 (often protected under RS 2477) to be closed or decommissioned.

Add a standard that roads built prior to October 1976 cannot be closed, decommissioned, or obliterated under this plan without a separate legal process.

4. Non-Tribal Subsistence Use Is Not Protected

Issue:

The plan only mentions Tribal rights and fails to acknowledge rural non-tribal communities that rely on the forest for subsistence.

Include a standard explicitly recognizing subsistence motorized access for rural residents as a valid cultural and economic use of the forest.

5. No Binding Language to Protect Access in Future Projects

Issue:

Future Forest projects (like fuels reduction or restoration) are not required to follow any plan commitments to access.

Add a guideline requiring that all future project-level decisions must uphold forestwide plan commitments to motorized access.

6. ROS Zones Limit Motorized Use Without Justification

Issue:

The plan assigns "Semi-Primitive Non-Motorized" zones to many areas without analyzing the effect on current motorized use.

Require NEPA-level analysis of all ROS zone changes and add an alternative that protects

existing motorized use.

7. Public Assurances Aren't Reflected in the Plan

Issue:

The Forest Service said, "the forests will remain open," in public meetings, but the written plan doesn't guarantee this.

Translate verbal public commitments into enforceable plan language that protects roads and forest use.

8. ROS Zoning Outside Wilderness Is Misused

Issue:

The plan uses SPNM or Primitive zones in areas that are not wilderness, preemptively cutting off access.

Rezone these areas as Semi-Primitive Motorized or Roaded Natural..

9. Rural Cultural Traditions Ignored

Issue:

Only Tribal cultural practices are protected - traditional uses by non-Tribal communities (e.g., hunting camps, woodcutting) are excluded.

I use these mountains for hunting and Bonding with my Father. He's been hunting these mountains for over 40 years and hunting season is the only time of year that we really get to hang out. I'd hate to see these places restricted and limit our hunting opportunities and bonding time.

Recognize rural traditions as valid cultural practices under the National Historic Preservation Act (as Traditional Cultural Properties).

10. Participation of Wallowa Resources May Violate FACA

Issue:

The Forest Service allowed Wallowa Resources to participate in the Blue Mountains Intergovernmental Council (BIC) without complying with public transparency rules under FACA.

Remove any content influenced by improper advisory groups, disclose their role, and restart a public planning process that complies with the Federal Advisory Committee Act.

11. Plan Repeats the Withdrawn 2018 Version

Issue:

Over 85% of this plan is identical to the 2018 version that was formally withdrawn by the agency itself in 2019.

Start a new planning process using new analysis, public input, and direction from the 2019 withdrawal decision.

I respectfully request that the Forest Service revise the draft plan to protect motorized access, recognize rural traditions, and ensure that long-time users of these public lands are not excluded by vague zoning or process shortcuts.

This plan should reflect the needs of the people who live here and rely on these forests - not

just outside groups, or prior rejected plans. I appreciate the opportunity to comment and ask that you carefully consider the real-world impacts this plan will have on families like mine. Thank you for your time and for taking public input seriously.