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Comment on the Sufferin' Springs Vegetation Management (SSVM) Environmental Assessment  
Wallowa-Whitman National Forest - La Grande Ranger District

Forest Access For All (FAFA) submits the following comment on the Sufferin' Springs Vegetation Management Environmental Assessment (EA). This comment is substantive, record-based, and directed to whether the proposed action complies with the project's stated Purpose and Need, the scope of emergency authority relied upon, and the procedural requirements of the National Environmental Policy Act (NEPA).

As discussed below, the EA relies on unclear baseline conditions, assumes road storage without adequate justification, and advances actions that are not shown to be necessary to meet the project's stated objectives. These deficiencies prevent meaningful public review and raise serious concerns regarding the integrity of the decision-making process.

#### I. Emergency Authority and Project Scope Are Not Adequately Aligned

The SSVM project is presented as an emergency action intended to reduce wildfire risk and protect public and firefighter safety. Emergency authority is intended to expedite actions that are necessary and directly related to addressing imminent wildfire hazards.

However, the EA does not clearly demonstrate that all proposed actions fall within that limited scope. In particular, the document does not show that road storage or access restriction measures are required to achieve emergency wildfire objectives, nor does it explain why these actions cannot be deferred to a non-emergency planning process.

Emergency authority does not provide a blanket justification to advance long-standing or previously unresolved management objectives. Where the connection between an action and emergency wildfire risk reduction is not demonstrated, reliance on emergency authority is improper.

#### II. Purpose and Need Does Not Support Road Storage or Access Restrictions as Proposed

The stated Purpose and Need focuses on reducing wildfire intensity, improving fire behavior, and protecting public and firefighter safety. The EA does not identify access reduction, wildlife security, or long-term travel management as project purposes.

Despite this, the EA treats road storage as an assumed condition rather than an impact-producing action requiring analysis. The document does not demonstrate:

that specific roads are contributing to wildfire danger or post-fire risk,

that storing or restricting access on those roads is necessary to meet any element of the Purpose and Need, or

that less restrictive alternatives would fail to achieve the same objectives.

Where watershed or hydrologic concerns are cited, the EA does not demonstrate that road storage is the least

impactful or necessary measure, nor does it explain how access restrictions directly reduce wildfire risk. This represents a failure to connect proposed actions to the stated Purpose and Need and prevents a reasoned evaluation of alternatives.

### III. Road Baseline Conditions and System Effects Are Not Clearly Disclosed

Appendix materials and tables reference prior decisions and existing road designations, but the EA does not clearly disclose:

which roads are currently designated as Maintenance Level 1 (ML1) or "stored,"

which roads are currently open to public motorized use,

whether any roads would functionally shift from open to unavailable under this project, or

what administrative actions authorize those designations.

Maps are difficult to interpret due to overlapping symbology and color schemes, making it impossible for the public to discern road status or proposed changes with confidence. This lack of clarity undermines informed public participation and raises concern that access impacts are being obscured rather than evaluated.

If road storage is not a project action, the EA must clearly explain how public motorized access will be maintained. If road storage is relied upon, it must be disclosed, analyzed, and justified as part of the Proposed Action.

### IV. Reliance on Prior Decisions Is Not Adequately Supported

Tables identifying past decisions do not establish that public motorized access restrictions were implemented on the ground. The EA does not identify closure orders, dates of implementation, enforcement measures, or Motor Vehicle Use Map (MVUM) changes that would demonstrate that roads were formally and permanently closed.

Treating historic planning intent or unimplemented decisions as settled baseline conditions is arbitrary. NEPA requires accurate disclosure of existing conditions, not assumptions based on unresolved or partially implemented actions.

### V. Social and Economic Impacts to Local Communities Are Not Adequately Analyzed

While the EA discusses vegetation treatments and fire behavior, it does not take a hard look at social and economic impacts resulting from reduced road availability.

Roads in the project area provide access for firewood gathering, grazing operations, hunting, emergency response, and general forest use that supports rural livelihoods. The EA does not analyze how access changes affect these uses, nor does it disclose who bears the burden of lost access versus who retains operational flexibility.

This omission is particularly problematic in an EA intended to support a Finding of No Significant Impact. Without a meaningful analysis of community-level effects, the agency cannot reasonably conclude that impacts are insignificant.

### VI. Pre-Decisional Actions Undermine the Integrity of the NEPA Process

Members of the public have observed Forest Service personnel marking treatment units within the project area prior to issuance of a signed decision. While the agency may characterize this activity as preparatory, conducting on-the-ground implementation steps before completion of the NEPA process creates the appearance that the outcome has already been determined.

NEPA requires agencies to take a hard look at environmental impacts and to meaningfully consider public input and reasonable alternatives before committing to a course of action. Pre-decisional marking risks signaling a predetermined outcome, undermining public confidence in the review process and calling into question whether comments and alternatives will be genuinely considered.

The Forest Service should clearly explain the purpose and scope of any pre-decisional field activities and ensure that no actions are taken that would prejudice the selection of alternatives or limit agency discretion prior to completion of NEPA review.

## VII. Climate Change Analysis Raises Procedural Concerns

The EA includes discussion of climate change despite current administrative and departmental guidance directing agencies not to rely on climate change as a justification for agency action. The EA does not explain why climate analysis is required for this emergency project or how it relates to the authority relied upon.

Including climate change analysis without clear statutory or policy grounding risks substituting staff preference for lawful direction and distracts from the stated emergency wildfire purpose of the project.

## VIII. EA Does Not Support a Finding of No Significant Impact

Taken together, the deficiencies identified above - unclear baseline conditions, unsupported access assumptions, lack of community impact analysis, and pre-decisional actions - demonstrate that the EA does not provide sufficient information to support a Finding of No Significant Impact.

At a minimum, the Forest Service must correct these deficiencies before proceeding. If the agency cannot do so, preparation of an Environmental Impact Statement (EIS) is warranted.

## IX. Requested Remedies

To address these concerns, FAFA requests that the Forest Service:

Remove road storage and access restriction assumptions from the project unless they are fully disclosed, analyzed, and justified under the Purpose and Need.

Clearly identify road status, including any reliance on prior decisions, with supporting documentation.

Correct baseline descriptions to reflect actual management conditions.

Clarify and limit any pre-decisional field activities to avoid prejudicing the outcome.

Conduct a meaningful analysis of social and economic impacts related to access.

Reevaluate whether the project supports a FONSI or requires preparation of an EIS.

## X. Conclusion

The Sufferin' Springs Vegetation Management EA does not demonstrate that all proposed actions are necessary to meet its stated Purpose and Need, nor does it provide the level of disclosure and analysis required for informed decision-making. These deficiencies raise serious concerns that conclusions are being reached before impacts are fully evaluated.

FAFA urges the Forest Service to correct these issues before proceeding further