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Comments: Forest Access For All (FAFA)
Supplemental Comment on the
Sufferin' Springs Vegetation Management Project
Preliminary Environmental Assessment
Wallowa-Whitman National Forest - La Grande Ranger District

Submitted via CARA

Introduction

Forest Access For All (FAFA) submits the following supplemental comment regarding the Sufferin' Springs Vegetation Management Project Preliminary Environmental Assessment (EA). FAFA previously submitted comments addressing several procedural and disclosure concerns related to the treatment of the transportation system within the project area.

This supplemental comment is provided to clarify and expand on those concerns after reviewing the EA and other public comments submitted during the comment period. In particular, FAFA believes the EA does not clearly disclose baseline road conditions or adequately analyze the potential effects of changes in road availability associated with the project.

These issues directly affect the ability of the public and affected communities to meaningfully evaluate the project's impacts.

1. Baseline Road Conditions Are Not Clearly Disclosed

The EA indicates that some roads within the project area are classified with an Objective Maintenance Level 1 (ML1) designation while simultaneously acknowledging that certain roads are currently operating as open.

Specifically, the EA states that:

"Objective Maintenance Level 1 roads that are currently operating as open may be used by this project and would be stored at the conclusion of the project."

This language creates uncertainty regarding the actual baseline conditions within the project area.

NEPA requires agencies to clearly describe existing environmental conditions so that the public and decision makers can understand how a proposed action would change those conditions. When a road is currently open and available for public use but is treated in analysis as though it were already closed or stored, the resulting baseline description may not accurately reflect on-the-ground conditions.

Without a clear disclosure of which roads are presently open to public motorized use and how their status would change following project implementation, the public cannot meaningfully evaluate potential impacts to access or recreation.

FAFA therefore requests that the Forest Service clearly disclose:

Which roads are currently open and available for public motorized use

Which roads are currently designated as ML1 (stored) but remain physically open or in use

Whether any roads currently open to the public would be unavailable following project implementation

Clarifying these conditions would ensure that the EA accurately reflects existing conditions and allows for informed public review.

2. Changes in Road Availability Must Be Analyzed as Project Effects

The EA describes the possibility that certain roads may be used during project implementation and subsequently returned to stored status following completion of project activities.

If roads that are currently open or available for public use would become unavailable after the project, that change represents a potential impact to access availability that should be analyzed within the EA.

However, the EA does not clearly identify whether any such changes would occur or evaluate the potential effects of those changes on:

Public recreation access

Firewood gathering and subsistence uses

Grazing permit administration

Hunting and seasonal forest access

Emergency response and administrative access

Because the EA supports a Draft Finding of No Significant Impact (FONSI), it is important that all reasonably foreseeable impacts to public use and community access be fully disclosed and analyzed.

FAFA therefore requests that the Forest Service clarify whether the project would result in any changes to the availability of roads currently used by the public and, if so, analyze those effects accordingly.

3. Community and Socioeconomic Access Considerations

Baker County's submitted comments raise concerns regarding the potential effects of road availability on local communities and rural land users.

FAFA believes these concerns are relevant to the NEPA analysis. Roads within the project area provide access for a variety of legitimate public uses including:

Firewood gathering

Grazing permit operations

Hunting and seasonal recreation

Administrative and emergency access

To the extent that project implementation could alter road availability or access patterns, those changes may have community-level implications that should be disclosed and evaluated within the environmental analysis.

Clarifying the baseline road system and any anticipated changes would help ensure that these considerations are properly addressed.

4. Public Participation Considerations

Several comments submitted during the comment period have also noted that the abbreviated comment period limited the ability of interested parties to fully evaluate the project record.

Because the EA contains complex transportation system information and references prior decisions affecting road status, additional clarity regarding baseline road conditions would assist the public and affected communities in understanding how the proposed project relates to existing access conditions.

Providing clear disclosure of these conditions will help ensure that the public participation objectives of the NEPA process are meaningfully met.

Conclusion

FAFA appreciates the opportunity to provide these supplemental comments.

To ensure that the decision is supported by a complete and transparent record, FAFA respectfully requests that the Forest Service:

Clearly disclose baseline road conditions within the project area, including which roads are currently open and available for public use.

Clarify whether any roads currently open to the public would be unavailable following project implementation.

Analyze any resulting changes in road availability as potential project effects, including their implications for public access and community use.

Providing this clarification will strengthen the environmental analysis and allow the public and decision makers to better understand the relationship between the proposed vegetation treatments and the transportation system within the project area.

Thank you for considering these comments.

Forest Access For All (FAFA)