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Organization:

Title:

Comments:

Docket ID: CARA Project 359331

Referenced Identifier: Upper Wallowa Valley Strategic Fuel Breaks

Position: Oppose Action as Proposed //>>>

?[MAIN EXECUTIVE SUMMARY]:

I am submitting these comments to express strong opposition to the Upper Wallowa Valley Strategic Fuel Breaks proposal as currently structured. While proactive wildfire management is essential for community protection, establishing permanent, heavy fuel breaks along the boundary of the Eagle Cap Wilderness carries substantial ecological risks. The Forest Service must not proceed under a Categorical Exclusion and must instead execute a thorough Environmental Assessment (EA) or Environmental Impact Statement (EIS) to evaluate cumulative impacts, rare species protections, and project design alternatives. //>>>

?[A. PROCEDURAL VIOLATION AND IMPROPER PROJECT SEGMENTATION]:

The agency appears to be impermissibly segmenting a single, continuous landscape treatment to bypass standard NEPA disclosure requirements. By dividing the broader fuel break effort into separate administrative actions-specifically the Upper Wallowa Valley project and the adjacent Huckleberry to Minam project-the combined footprint exceeds 4,700 acres. Splitting connected actions with identical timing, geography, and administrative leadership to remain under the statutory 3,000-acre Categorical Exclusion threshold violates NEPA principles. The Forest Service must combine these connected actions into a unified EA or EIS. //>>>

?[B. BOUNDARY ECOLOGY AND WILDERNESS PRESERVATION]:

Establishing permanent mechanical clearings directly adjacent to the Eagle Cap Wilderness boundary introduces persistent physical and visual disruptions to lands designated for natural preservation. Long-term canopy removal, heavy equipment operation, and ongoing maintenance activities along this perimeter directly compromise wilderness untrammeled character, core habitat tranquility, and primitive quiet recreation opportunities. The agency must rigorously analyze these boundary-specific impacts before approving ground-disturbing work. //>>>

?[C. PROTECTION OF SPECIAL-STATUS BOTANICAL SPECIES]:

The proposed treatment corridors overlap sensitive habitats supporting rare and endangered plant species, including Greenman's trustmon and ESA-listed whitebark pine. Mechanical ground clearance, heavy equipment staging, and broadcast herbicide applications targeting invasive weeds risk non-target destruction of these vulnerable species. Comprehensive botanical surveys must be completed, and strict mandatory exclusion zones must be implemented to prevent irreparable harm to localized plant populations. //>>>

?[D. COUNTER-PRODUCTIVE FIRE RISKS FROM CANOPY OPENING]:

Extensive timber extraction and canopy reduction can paradoxically increase wildfire hazards rather than reduce them. Removing mature overstory shade elevates forest floor temperatures, accelerates evaporative drying, increases solar exposure, and amplifies localized wind velocities. Furthermore, soil disturbance promotes the rapid establishment of highly flammable, invasive ground cover such as cheatgrass. The agency must evaluate how stand opening and heavy fuel generation could escalate surface fire intensity along sensitive borders. //>>>

?[E. ECOLOGICAL FRAGMENTATION AND HABITAT CONNECTIVITY]:

Linear clearings across intact forest tracts generate wide edge effects and disrupt critical wildlife travel corridors for canopy-dependent species. The agency's scoping analysis must quantify the effective loss of interior forest habitat, evaluate soil compaction impacts, and analyze cumulative displacement effects on native fauna moving between wilderness core areas and surrounding habitats. //>>>

?[F. PRIORITIZATION OF LOW-IMPACT ALTERNATIVES]:

Rather than executing large-scale, permanent landscape conversions on public forest land, the Forest Service should fully analyze non-ground-disturbing alternatives. Priority should be directed toward home ignition zone defensible space treatments immediately surrounding private structures and communities, combined with non-

commercial, light-touch fuel management methods along existing road footprints. //>>>

?[CONCLUSION]:

Given the cumulative ecological risks, extraordinary botanical circumstances, and procedural issues regarding project segmentation, proceeding under a Categorical Exclusion is legally and environmentally flawed. I request that the Wallowa Valley Ranger District pause project implementation and prepare a comprehensive EA or EIS that thoroughly addresses these substantive concerns. //>>>

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Respectfully submitted for the record, Sandra Holloway, Yuma, AZ