

TO: Wallowa Valley Ranger District, Wallowa-Whitman National Forest

CC: Honorable Senator Ron Wyden

CC: Honorable Senator Jeff Merkley

VIA: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=358854> and

<https://cara.fs2c.usda.gov/Public/CommentInput?Project=359331>

Subject: Huckleberry to Minam Fuel Break CE and the Upper Wallowa Valley Fuel Break CE — comments

August 7, 2026

Dear Wallowa Valley Ranger District,

The Partnership for Policy Integrity (PFPI) is a US-based NGO that uses data-driven advocacy and litigation to protect nature, communities, and the climate. We envision a world where governments recognize the centrality of protecting and restoring natural ecosystems to a livable future, and align their energy, climate, and land use policies to achieve that goal. We offer the following comments on the *Proposed Activities for the Upper Wallowa Valley and Huckleberry to Minam Fuel Breaks*.

I am a climate and forest ecologist who lives in Wallowa County, Oregon. I study the forest ecosystems of the Blue Mountains and have extensive on-the-ground experience in the forests of the project areas. I also regularly lead public tours that focus on roadless and undeveloped forests that are within the project areas, educating locals and visitors about the outstanding qualities and values of roadless forests that would benefit from additional protections. I have had the pleasure of co-leading an outing with Forest Service fire managers to examine prescribed fire use in an area near the Upper Wallowa Valley Fuel Break Project. My family frequently recreates in these forests, especially the Huckleberry Roadless Area, where we climb the peaks, appreciate the old growth and mature forests, and walk the creeks marveling at the beauty and diversity of this intact forest landscape.

I have serious concerns about aspects of this proposal. A major focus of my research has been on the intact forest ecosystems of the Blue Mountains. For the last decade I have examined opportunities to develop a reserve system across the Blue Mountains and prioritized areas that are most important. This project would impact and possibly degrade Wilderness quality forests that are high-priority additions to the Eagle Cap Wilderness.

Inventoried and uninventoried roadless forests are incredibly important ecologically and aesthetically, especially when adjoining each other and creating larger intact areas.

Wilderness and adjacent roadless lands function holistically. Existing reserves tend to be at higher elevations than nearby IRAs that extend into adjacent lower elevation areas with unique wildlife habitats and ecosystem types (Aycrigg et al., 2016; Crist et al., 2005; Talty et al., 2020). Roadless areas that physically link existing reserves together safeguard system functionality that is of existential importance to wide-ranging species and critical to climate adaptation (Mildrexler et al., 2026).

These intact forest landscapes provide an exceptional confluence of significant environmental values, such as drinking water, high-quality habitat, climate mitigation, biodiversity and cultural values, and much more (Watson et al., 2018; Olden et al., 2026). In fact, Inventoried Roadless Areas are among the highest integrity forest ecosystems in the nation, even when compared to protected areas (Mildrexler et al., 2026). The Wallowa Mountains are an incredible example of this dynamic with a large core Wilderness area encircled by many IRA's that extend into lower elevation habitats. Simply put, the Wallowa Mountains are a very unique landscape and the Eagle Cap Wilderness, together with its surrounding roadless lands, make this area a very important conservation landscape that needs greater protection.

These two projects analyzed in the same proposed action would impact almost 6,000 acres extending across a large and diverse forested area around Oregon's largest Wilderness Area. This project proposes commercial logging and mechanical treatments, actions that change things fast, have a big impact, and take a long time to recover over thousands of acres distributed across a large geographic area. That is an extraordinary circumstance. In addition to the size of a project, the ecosystem impacts are significant. The project area includes never before logged wilderness quality lands that are proposed for logging in this project. These ecosystems will never be the same. To not count that as extraordinary is to take wilderness and intact nature for granted, which runs strongly counter to science across a range of disciplines. We are strongly opposed to the use of a CE for this project. At the minimum an EA should be completed.

The Huckleberry to Minam Fuel Break contains the worst offending proposed fuel breaks which overlap the IRA and include road systems that do not access a campground or trailhead and serve no public purpose. Why improve access to these roads? In a forest with a massive excess of roads, we should be thinking critically about the tradeoffs of expanding mechanical treatments along roads into remote backcountry areas. Especially in areas where targeted road closures would protect ecosystems of great importance and limit risk of human-ignited fires.

Some of the actions proposed here could lead to increased risk of fire by improving and thereby increasing vehicular access on remote road systems (See section 4.3 *More Roads*

Lead to More Wildfires in Mildrexler et al. (2026)). A recent assessment of the impacts of roads on wildfire ignition density found that from 1992 to 2024, in all 8 contiguous-US Forest Service regions combined, the highest wildfire-ignition density was in lands within 50 m of roads (Aplet et al., 2026). The lowest wildfire ignitions were in designated Wilderness and IRAs (Aplet et al., 2026).

Some areas proposed for commercial and mechanical treatments are part of proposed Wilderness additions to the Eagle Cap, and this project could negatively impact forest values in these areas. This undermines long-standing citizen efforts to protect these landscapes. Consider how long it took for a conservation vision for the Minam River Wildlife Area to finally become reality. Huckleberry has long been a part of efforts to expand the Eagle Cap Wilderness. In previous versions of the Blue Mountains Forest Plan that were transparent and incorporated science and community interests, the Huckleberry IRA was Recommended Wilderness in every preferred alternative put forward. I ask the Forest Service to respect the legacy of citizen-based conservation work in this area by dropping commercial logging within or directly adjacent to the Huckleberry IRA.

Recent conservation progress on adjacent private lands in this area bolsters opportunities to protect landscapes in parts of the project area. On adjacent ground a private land conservation project has helped safeguard 10,000 forested acres from development. This large private forest borders a significant stretch of national forest ground, which is a big positive from a fire risk reduction perspective. This area will be kept free from houses, and tools like thinning and prescribed fire are already underway or in planning stages for this privately owned forest. This conservation success on the public-private land interface should alleviate the need for an aggressive fuel break into roadless forests on public lands. And a fuel break was recently implemented along Little Bear Creek as well. I just see no reason for pushing into the remote corners near the IRA with fuel breaks.

The following are some of my major concerns.

- Commercial logging and mechanical treatment of verified and ground-truthed wilderness quality lands (Uninventoried and Inventoried Roadless Areas).
- Commercially log old growth forest areas and previously unlogged forest ecosystems.
- Degrade forests that are within a locally developed science-based Wilderness proposal for key additions to the Eagle Cap Wilderness.
- Targets fuel breaks for remote backcountry roads that are not needed and do not serve the public, thereby needlessly expanding mechanical footprint deep into backcountry forests.
- Threatens to increase risk of fire ignition by improving roads into remote areas.

- Degrades forests identified as strategic forest reserves that are recommended to be protected from such activities (Law et al., 2022).
- Runs counter to the science on fuels reduction and active management in high value conservation forests.

In conclusion, sensible fire management is critically important. But in recent years I have observed a pattern of fuels related projects in Wallowa County that include degradation of high-value conservation forests. This project exacerbates the trend by pushing fuel breaks deep into high-priority conservation forests, even into areas dominated by undeveloped and roadless forests. This project goes even further, degrading areas that citizens are working to add to the Eagle Cap Wilderness. Science tells us to stay out of these intact forests with mechanical and commercial logging.

While I support sensible wildfire management, aspects of this proposal do not fit the description. The proposal would impact lands with Wilderness character that should not be subject to fuel breaks. It incorporates road systems that are inappropriate, and does not consider the risks of increasing human access to remote road systems.

Sincerely,

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