

Appendix "E"
Organized Response Report

Organized responses, or “form letters,” represent most of the total comments received on the Wallowa-Whitman National Forest Travel Management Plan ROD. Two or more responses received from different individuals but containing identical text, or identical text plus additional comments, are defined as form letters.

Organized Response Campaigns

Once an organized response campaign letter, or “form,” is identified, a “form master” containing all comments is identified in the CARA database. All “form plus” responses with matching text are then linked to this master within the database with a designated name. The additional comments are coded in the CARA comment database. Table E-1 presents the total number received of each organized response campaign letter and summarizes the concerns found therein.

Forms and form pluses that appeal the ROD are tallied in Table E-1. Forms and form pluses that do not appeal the ROD are tallied in Table E-2.

Table E-1. Organized Response Campaigns that Appeal the ROD

Organized Response Campaign Master; Letter Number	Total Forms and Form Pluses Received	Summary of Form Letter Content
143	4	Commenter grew up in these mountains, and is accustomed to hunting, fishing, picking berries, cutting wood, and pursuing other such activities with family and friends. Refuses to stay out of these mountains, “ticketed or not.”
153	6	Cites numerous roads that should remain open to support the quality of the human environment. These roads should be kept open year-round, not seasonally. The closures not only affect the commenter and family today, but will for generations to come. As an inholder, commenter needs use of roads to manage livestock, cut firewood, and gather food. Also wishes to visit historical sites (e.g., Sanger Mine, Hogum). Road closures will negatively affect property value, thus reducing value to be inherited by grandchildren and great-grandchildren. USFS failed to give adequate notice of this action; actions were arbitrary and capricious, ignoring significance of action. Remand until further NEPA analysis is completed.
156	10	Forest Service violated 40 USC 1508.8 by not taking a “hard look” at the cumulative effects of the “massive road closures.” Forest Service was arbitrary and capricious in not taking a “hard look” at a number of specified roads, the closure of which has a cultural impact. Roads historically used by commenter and family for generations; thus, closure a violation of 40 USC 1508.8. Commenter appeals eligibility according to written and oral comments submitted during 30-day comment period.

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173	2	Remand until a supplemental EIS is completed, in accordance with the "standing plan of operation." Forest Service failed to take a hard look at the proposed actions' effect on quality of human environment by closing all forest roads on the Pine Valley Ranger District (as required by 40 CFR 1500.2, 1508.19). Roads important to commenter and family for recreation and enjoyment. Family owns share of patented mining claim on a forest road and Forest Service has historically provided access. Forest Service was arbitrary and capricious in closing these roads without adequate NEPA analysis of effect on human environment. Received no notice of "this taking" as required under 40 CFR 1506.6. Also failed to take "hard look" at economic impact of closures, as required under 40 CFR 1500.2 and 40 USC 1508.14; those roads important for wood cutting and food gathering, studying animal and plant life, and for religious satisfaction involved in these uses. Give serious consideration to those who live in or near forest and use year around before proceeding further.
181	6	Forest Service failed to take "hard look" at proposed actions' effect on the quality of human environment by closing a number of specified roads. Those roads important to commenter and family for recreation and enjoyment of federally managed public lands. "Life experiences" shared with family and friends depend on access. Forest Service was arbitrary and capricious in closing roads without adequate NEPA analysis of effect on human environment. Remand until supplemental EIS is completed.
182	6	Forest Service failed to take "hard look" at importance of roads and areas to culture of family (as required under 40 USC 1508.8). Those roads have been used by generations of family for recreation; part of family culture. Historic value of roads and areas to commenter and generations of family much be considered; Forest Service was arbitrary and capricious. Forest Service failed to take "hard look" at economic impact of closures on small local communities and businesses (as required under 40 USC 1508.8). Used by generations for wood cutting and food gathering, hunting, four-wheeling, and other social, artistic, and recreational activities. Forest Service did not take "hard look" required by 40 USC 1508.27. Remand until further analysis, as required by NEPA.
193	2	Remand because (1) commenter and others heat homes with firewood and will be impossible to find suitable cutting locations; (2) several closures are private access roads; (3) will no longer have access to historical sites; (4) limiting roads used to enjoy the forest and/or gather food will cause more accidents on forest roads; (5)

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		public should have say in decisions regarding public lands. TMP intended to protect elk herds, which are thriving. If Forest Service concerned about elk, would not have released wolves in area.
243	2	Forest Service failed to take "hard look" at how closing roads in would affect way of life for so many people who harvest and use forest as a way of life. Closures would change historic, economic, and social lives, and health, of many who have used the forest for generations. "Enough is enough," no more road closures.
244	8	Forest Service failed to take "hard look" at importance of roads and areas to culture of commenter's family (as required under 40 USC 1508.8). Roads and areas have been used by generations of family for recreation, such that they are part of generational culture. Historic value to commenter and generations of family must be considered; Forest Service was arbitrary and capricious for not taking "hard look" at effect of closures. Forest Service failed to take "hard look" at direct and indirect economic impacts on local communities and businesses. Commenter and family have used roads and areas for wood cutting and food gathering, hunting and fishing, four-wheeling, social gatherings, and other activities. Forest Service failed to take a "hard look" at significance of action (as required under 40 USC 1508.27); remand until further NEPA analysis completed.
246	4	Forest Service was arbitrary and capricious in taking away commenter's right to drive on roads that have existed longer than commenter has resided in Wallowa County. Spent life in these mountains; enjoyed raising family and educating children about wilderness. Forest is as much home as local community; they take care of it and keep it as found, without destroying any part of it. No need to close roads in county with so much surrounding wilderness. Forest Service failed to take a "hard look" at the following: 36 CFR 215.11, Sections 1500.2(e) and 1500.2(f) (impact on quality of human environment); Section 1508.08(a) (impact on community); Section 1508.14 (impact on those who gather wood and food, and recreate); Section 1508.25-2 (cumulative impacts on community recreation); and Section 1508.27(b) (impact of even being in the woods without breaking the law). Specifies a number of roads under appeal to leave open.
328	5	Forest Service violated 40 USC 1508.8 by not taking "hard look" at cumulative effects of "massive" road closures. Was arbitrary and capricious in deciding without taking "hard look" at a number of roads specified. Closure of these roads, which have been historically used by commenter and family, has cultural impact. Thus, Forest Service violated 40 USC 1508.8. Appealing eligibility per written and oral

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		comments commenter submitted during 30-day comment period.
345	8	Forest Service failed to take "hard look" at direct and indirect economic impacts of road closures on local communities and businesses (as required under 40 USC 1508.8). Commenter and family have used roads and areas in Wallowa County. All roads should be left open because cross-country travel has been eliminated. Family has used many roads and areas for wood cutting and food gathering, hunting, four-wheeling, and OHV use.
367	4	Forest Service failed to take "hard look" at effect of proposed actions on quality of human environment by closing a number of roads specified. These roads are important to commenter and family for enjoyment of public lands. Their life experiences today and in future depend solely on access to these routes. Forest Service was arbitrary and capricious in closing roads without adequate NEPA analysis of effect on human environment. Remand until supplemental EIS is completed.
375	10	Forest Service needs to take "hard look" at all road closures with regard to impact on all the things for which the commenter moved to the area: wood cutting and food gathering, hunting, picnicking, and sight-seeing.
538	13	Forest Service acted arbitrarily and capriciously in closing roads, failing to take "hard look" at 40 CFR 1500 NEPA regulations. Per 1500.2, Agency did not consider direct social and cultural impacts of road closures on commenter, who with family and friends enjoys four-wheeling, hunting, fishing, wood and food gathering, and many other activities. Decision affects ability to teach children and grandchildren about areas and how to safely enjoy activities. Decision will indirectly affect socialization, education, and enrichment, and thus safety, food supply, and environmental protection for current and future family and friends. Closures will affect ability to pass along personal traditions. Decision will diminish quality of human environment guaranteed under 1502.2(f), specifically social interaction, camaraderie, and working together, and will ruin businesses. Forest Service failed to take "hard look" at 1508.14, affect on human environment of putting 90% of people in 30% of area accessible before closures. Also failed to take "hard look" at fire suppression. Commenter losing opportunity to partner with Forest Service to maintain the roads and educate public as to their proper use.

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591	24	Forest Service acted arbitrarily and capriciously with decision to close roads specified. Failed to take "hard look" at 40 CFR 1500 NEPA regulations, specifically 1500.2(d), (e), (f), in not considering direct impact on commenter socially, ecologically, culturally, historically and traditionally. Limits ability to explore new areas for recreation. Agency failed to take "hard look" at 1508.8(a) for social, cultural, and traditional experiences, thus limiting commenter's ability to show family new areas for camping and hunting. Failure to take "hard look" at 1508.8b and indirect effects, limits visitors ability to discover Wallowa-Whitman. Same failure to take "hard look" at 1508.14 and 1508.25 eliminates travel to historical and recreation areas important to generations of family, and has cumulative effect of too many people condensed into one area, respectively. Similar failure involving 1508.27 will have significant effects with regard to cultural and historical resources. Agency should provide stewardship, not lock people out.
621	2	Forest Service failed to take "hard look" at effect of decision on social and cultural environment with regard to a number of specified roads, as required under 40 USC 1508.8. Commenter and family have used these roads for many years for cutting wood, gathering food, and transporting horses. Closures will have cumulative effects on local communities. Agency actions without sufficient analysis of impacts are arbitrary and capricious.
631	2	Forest Service failed to listen to people living in community and effect of closures on recreation and livelihoods. Should develop plan that will serve everybody. Agency failed to consider importance of many roads, as specified, slated for closure. Hard economic times require solutions, not more difficulty. Four generations of family have used forest for berry picking, hunting, and fishing, while leaving the woods as found and teaching their children and grandchildren to respect and care for forest. Family has lived in Grant and Union counties for more than 150 years, and would be "a crime" to lose what they love.
658	2	Forest Service failed to take "hard look" at the following: (1) importance of all trails and roads, (2) respect for commenter's rights under 40 CFR 1500.2 (environmental consequences), (3) effects under 1508.8(a) related to rights to hunt and fish, (4) cumulative impacts under 1508.25, and (5) elimination of privileges of commenter's children and grandchildren.
688	2	Forest Service acted arbitrarily and capriciously to close roads, failing to take "hard look" at 40 CFR 1500 NEPA regulations, specifically 1500.2(d), (e), (f). Did not consider direct social and

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		<p>cultural impacts on commenter and family, friends and their families. Commenter and family hunt, fish, gather wood and food, ride ATVs, and enjoy many recreational activities in the forest. Meet friends and their families for various recreational pursuits in the forest, including educating children and grandchildren to be safe when recreating and respect the land. Indirect effects on future outings, socialization, education, and enrichment, now and in the future, affecting ability to pass along knowledge and personal traditions. Quality of human environment will be greatly diminished, specifically with regard to social interaction, camaraderie, and mutually teaching children. Will ruin businesses, especially those that rely on tourism or supplies and services. Putting 90% of people in space that will be 30% of current area will be detrimental to human environment, and will reduce the number of people enjoying their public lands. Agency failed to take a "hard look" at fire suppression. Decision will cause loss of ability to partner with the Agency to maintain roads, educate, and otherwise volunteer.</p>
722	37	<p>Forest Service failed to take "hard look" at road closures in Union County, as required by 40 USC 1500.2 and 1508.14. Roads important to family and friends for recreation and enjoyment of federally managed lands, and life experiences depend on continued access. Agency was arbitrary and capricious with decision not supported by adequate NEPA analysis; should remand decision until supplemental EIS completed. Did not provide adequate notice of action to commenter, as required under 1506.6, because commenter's property will be affected by closures. Failed to take "hard look" at closures' impact on family culture, established over generations, and on historic value to commenter and future generations of family. Also failed a "hard look" at economic impact of closures on local communities and businesses, per 1508.8. Commenter and family have used roads for wood and food gathering, hunting, fishing, four-wheeling, and other recreational and familial activities (including weddings). With general failure to take a "hard look" at significance of action, Agency should remand the decision until further analysis is completed under NEPA.</p>
Total Forms and Forms Plus	159	

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Table E-2. Organized Response Campaigns that Do Not Appeal the ROD

Organized Response Campaign Master Letter Number	Total Forms and Form Pluses Received	Summary of Form Letter Content
262	1257	<p>Form 1: Dear Forest Supervisor Schwalbach:</p> <p>I am writing to ask the Forest Service to reconsider its recent decision to withdraw the Wallowa-Whitman Travel Plan. This plan was six years in the making and took into account a diverse set of views on how roads and off road vehicles should be managed in this ecologically important and scenic National Forest.</p> <p>Closing 3,600 of the over 9,000 miles of roads on the forest is a balanced approach. Some would like to see zero roads closed and others would like to see even more of these old, decaying roads put out of commission. This plan balances those two competing interests while maintaining important access for forest users. Equally important is that the plan would limit off highway vehicle travel that occurs off of existing roads and damages resources in the forest.</p> <p>The Forest Service spent the last 6 years gathering input from public meetings, letters, and online comments. There were 13 public meetings in the region and about 4,000 public comments received. Given this robust public engagement, recent comments from politicians complaining of a lack of public process seem misplaced.</p> <p>Travel management planning is not just about access, but also about protection of natural resources. Importantly, the plan would limit off highway vehicle travel that occurs off of existing roads and damages resources in the forest.</p> <p>Additionally, in these times of tight budgets and fiscal prudence, closing roads that are expensive and burdensome to maintain is the smart financial choice for federal taxpayers.</p> <p>Please move forward quickly to implement a rule similar to the proposed plan that the Forest Service exhaustively compiled over the last six years.</p> <p>Thank you.</p>

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55	12	<p>Form 2: Dear Regional Forester Connaughton and Supervisor Schwalbach:</p> <p>I'm writing to encourage you to proceed with a robust plan for closing harmful roads on the Wallowa-Whitman National Forest.</p> <p>Roads can act as vectors for noxious weed spread, lead to trash heaps on public lands, interrupt critical breeding periods, and impair water quality when they are failing.</p> <p>Closing roads is necessary to protect old growth forests, riparian areas, sensitive elk habitat areas, wildlife, fisheries, and quiet recreation. You must ensure that all Inventoried Roadless Areas are protected from motorized use, including the Elkhorn Crest National Recreation Trail that is within the Twin Mountain Roadless Area. Please do not let politics influence your transportation management plan decisions.</p> <p>Thank you in advance for ensuring a healthy Wallowa-Whitman National Forest for generations to come.</p>
59	1296	<p>Form 3: I am writing to express my concern and dismay over the decision to withdraw the Wallowa-Whitman National Forest Travel Management Plan less than a month after it was released. Pressure by a vocal minority, coupled with inappropriate political influence, wasted six hard years of work by the Forest Service and the public. The decision was withdrawn during an open appeal period without any acknowledged legal defect in the planning or the decision.</p> <p>I recognize how complex and difficult travel management planning can be. It requires the Forest Service to find the right mix of roads and trails that provides both quality recreation and necessary protections to fish, wildlife and other resources. Although challenging, it is one of the most important decisions a forest manager will ever make, and this one is long overdue.</p> <p>By its nature, travel planning is controversial. Advocates for unrestrained off-road driving will fight restrictions, while those concerned with the health of the forest will advocate for key habitats and natural resources, including access to quiet forests. What is most important is that the process the Forest Service utilizes is fair and open, and that the agency considers all valid comments. When</p>

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		<p>the process is thwarted, as in the case of the Wallowa-Whitman plan, no one wins, least of all the forest that continues to be vulnerable to ORV damage.</p> <p>The Wallowa-Whitman travel planning process must be put back on track as soon as possible. In the meantime vehicles should only be permitted on official Forest Service roads and motorized trails until a final travel plan is adopted. This is the only solution that will protect the quiet places in the forest I visit and the natural resources that we all depend on for clean water and clean air. This will also provide protection for the wildlife being driven from the forest by unrestricted ORV use.</p>
319	23	<p>Form 4: To: Ranger Monica Schwalbach & Ranger Jeff Tomac:</p> <p>I am writing to you to <u>voice my strong objections to any proposed road closures to and in and around the Wallowa Whitman US Forest lands.</u> These lands belong to the US Public and we as legal American citizens have full rights to use them and the roads within them as I read and interpret the US Constitution.</p> <p>In appreciation and respect for some of these lands being disturbed &/or destroyed by ATV's, Motor Dirt bikes, 4x4 vehicles driving off of the existing designated roadways I to STRONGLY object to this. However you should know that a similar problem was experienced in some of the Coastal Mountains US and BLM Forest Lands. Rather than you good people that are in charge of these lands taking a shotgun approach and closing all the roads. A much better approach would be to work with the folks that liked to play in the mud to use only designated areas. The users of these areas would be responsible for either paying for the erosion control components and/or furnished them and labor to install these erosion controls to reasonable specifications. These areas should be limited to lands that will receive minimal damage and at a future date can be restored to a natural condition by planting grasses and trees. For those who violate the rules of not staying on these designated lands there should be very stiff fines and citations that could be used by County Sheriff's Deputies, State Police and/or Forest Service – BLM officials. I offer this only as a potential solution to the problem. If there are other problems I am not aware of them. The needed materials could be paid for by permit stickers, similar to snow-mobile areas. These people who enjoy this type of recreation are entitled to use these lands just as the other general public, <u>but with restrictions.</u></p>

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		<p>Certainly you know that there are numbers of people who depend on these lands for firewood to keep warm and even to cook on as well as legal procurement of meat from game animals. Grazing permits for Cattle producers would also be greatly impacted by closing these roads. The old saying time is money certainly is the case for these Cattlemen who must have summer pasture permits for their livestock. "Time is money" it would take much time and expense to ride saddle horses to some of the grazing areas and this huge costs to cattle producers to check their cattle, as well as other reasons listed above.</p> <p>There are a number of disabled Veterans who receive great pleasure in driving through these roads and enjoying the beauty of this precious area. Taking pictures and just experiencing the serenity of the land. Many men and woman have fought and died for this privilege and freedom. To take this away from them would be a slap in the face of those who have given so much for our freedoms, and these lands provide precious solitude for many military that bare the scares of PSWS THAT DOES NOT GO AWAY. Please do not take this away from them. Thank you. (Check if you are a disabled Veteran () Please fill out and send immediately time is running out to protest.</p>
14	9	<p>Form 5:</p> <p>Dear Ms. Schwalbach,</p> <p>I am writing to inform you that I am opposed to the policy of closing roads in the Wallowa-Whitman National Forest and request that this letter be put in the record.</p> <p>Also, I would like personal notification when the decision on the Travel Management Plan in the Wallowa-Whitman National Forest comes out.</p> <p>I would also like personal notification when any decisions and/or actions occur in regards to the Travel Management Plan in the Wallowa-Whitman National Forest, especially if changes or actions involve any road closures or openings.</p> <p>You may send such notifications to me at:</p> <p>Thank you for your attention to this matter. If you have any questions, please feel free to contact me at your earliest convenience.</p>
Total Form Letters that Do Not Appeal the ROD		2,597