



File Code: 1950

Date: May 20, 2013

Dear Interested Travel Management Participants:

First, I thank you for your interest and the many hours you have put in working with us on this project and letting us know your concerns about access and use of the Forest. Even though the 2012 Decision was rescinded, I want to assure you that all of your work and comments will be incorporated as we move forward. Your comments and concerns for the communities, traditions, access, landscapes, and resources matter to us.

As stated in our March 2013 Newsletter, we are completing the content analysis performed on all the appeal and comment letters we received on the Travel Management Plan from March 16, 2012 to June 14, 2012. March 16th was the beginning of the appeal period and we chose June 14th as a cut-off date to allow the contractors to begin working on the content analysis. Content analysis is a systematic process designed to extract topics of concern from each letter, evaluate them, and group similar topics under a public concern statement that captures the intent of the commenter. This analysis was completed using a new automated system called CARA (Content Analysis and Response Application), which has been a work in progress.

The Content Analysis Report is attached to this letter. In addition, an Abstract is provided on the web site as a summary of the issues that were identified in the analysis. The developers worked closely with us to ensure the attached reports are an accurate portrayal of your concerns and comments. I intend to use this report, along with any communication received after June 14, 2012, to help us develop our public engagement process for moving forward. We heard two things loud and clear in your comments and concerns: you want to be engaged actively in any travel management process and we need to start with an accurate map of existing conditions.

To address the second point, and as I stated in our March Newsletter, we are currently working on updating the maps, which will more accurately describe the existing condition of the road system within the project area. We are incorporating as much of the survey information and comments you and the counties provided as possible as some of the comments had inaccurate trail names and information that was difficult to decipher. In addition, we are coordinating with District employees to add their knowledge of the conditions on-the-ground. We should be wrapping this up in the next month or two. Once we have maps that we have determined represent the input we received, we will hold public meetings to verify them with those of you who use the forest. We will also make the maps available to the public on our web site and are working on a way for you to comment so you can help fill in gaps in our information that may still exist.

This summer and fall we will be analyzing the baseline road system needs for administration of the forest, as explained in the newsletter. That is referred to as Subpart A of the Travel Management Rule. As I mentioned in the newsletter, and have told people at public meetings, the report of this analysis, due in 2015, describes what the Forest Service needs to manage the forest. It is not a decision and does not change the status of any road.

I welcome your comments and feedback on the Executive Summary. Please feel free to contact us at wwnf_travel_mgt_plan@fs.fed.us.

Sincerely,

JOHN LAURENCE
Forest Supervisor



Abstract

The Wallowa-Whitman National Forest (WWNF) Travel Management Plan Final Environmental Impact Statement (FEIS) and Record of Decision (Decision) were signed on February 21, 2012 and released on March 16, 2012, which then began the Appeal period. Subsequently, the Decision was withdrawn on April 17, 2012. The history of this project is provided at the end of this Content Analysis Report.

The appeal and comment letters received from March 16, 2012 to June 14, 2012 are included in the analysis; however letters received before and after these dates, and in the future will be considered in the development of any future plan. March 16th was the beginning of the appeal period and we chose June 14th as a cut-off date to allow the contractors to begin working on the content analysis. The WWNF worked with a contractor who provided an unbiased analysis of the comments from the appeal and comment letters, and together ensured the analysis is as thorough and clear as possible. The contractor was also responsible for developing concern statements, which summarize and combine similar comments.

This document is a brief summary of the Content Analysis Report and Appendices, which contains the complete analysis of the content from the public appeal and comment letters received by the Forest Service regarding the Wallowa-Whitman National Forest Travel Management Plan decision. Although this was not a formal comment period, the public actively provided comments and/or appealed the project during the appeal period and even after the decision was withdrawn. During the four month time period following the release of the FEIS and Decision, the Forest Service received 3,340 appeal and comment letters. Of the 3,340 letters, 17 percent were original responses, while 83 percent were form letters (2,597 form comment letters and 159 form appeal letters), see Table 1 and Appendix E in the Content Analysis Report for more detailed information. Following are the key points that we concluded from the analysis:

In a Nutshell: What We Heard

- People who appealed the decision, or who wrote to comment on the decision offered strong opposition to, or strong support for the plan.
- The Forest Service failed to communicate regularly, or with enough clarity, with the public. Many people felt there was little consideration of their input.
- Access is important: the ability of people to pursue activities in the forest ranging from casual users visiting for a day to those who depend on the forest for subsistence and livelihood was stressed over and over.
- There is concern by both those who supported the plan and those who did not over user conflicts and public safety.
- There is substantial concern over uses that would require Forest Service authorization and access to private lands.
- Those who wrote, regardless of their preference for the plan, supported protection of natural resources.
- Concern was expressed over the effect of the plan on custom and culture with regard to how people use the forest.

- People questioned whether the plan was based on the best available or most appropriate high quality science.
- There were concerns over the accuracy of the maps issued with the travel management plan decision and the Forest Services' ability to implement the plan.

Following are the main areas of concern from the appeal and comment letters:

- General Non-Support/Support of Decision and Options to Consider
- Recreation Management
- Permitted/Administrative Uses and Mining
- Natural Resource Protection
- Transportation Management and Planning
- Planning Process and Public Involvement
- Socio-Economic Concerns

1. General Non-Support/Support and Options

Comments and appeals that both did and did not support the plan were received. Those that did not support the plan generally wanted the decision withdrawn because they were concerned about restricted access to the forest and the resources. Those that supported the plan wanted the process to move forward. They noted that the process has been continuing for some time and are concerned that the reversal of the decision could serve as a "precedent" for other forests in the region and nation. Other respondents provided a mix of supportive and non-supportive comments on the travel plan decision.

2. Recreation Management

Respondents raised many concerns related to recreation. Some of the concerns included:

- Increased or decreased opportunities for traditional recreational uses such as hunting, berry picking, and camping
- Resource protection was not as important as the value of the area to recreational users
- Traditional off-road 4WD jeep activities might not be legal under the new travel plan
- Road closures would impact the public's trust in the Forest Service
- Access for the elderly and disabled
- Retrieval of big game taken during hunting seasons
- Conflicts among users
- Need for non-motorized recreation areas
- Public Safety

3. Permitted/Administrative Uses and Mining

Many respondents commented on forest management or uses, and programs managed under a type of permit, contract, or law. Some of the concerns included:

- Administrative Access - timber harvest, firefighting, grazing, water rights, ditches, search and Rescue, and law enforcement

- Mining Access – access to existing mining claims, and the need for consistency with the mining law
- Firewood – impacts to access for firewood cutting, financial impacts to the public, and health of the resource
- Access to private lands – inholdings or those who live adjacent to National Forest System lands

4. Natural Resource Protection

Commenters expressing support for the decision indicated the travel plan decision would restore forest health, protect wildlife, old growth forests, riparian areas, critical elk habitat areas, fisheries, traditional recreation, roadless areas, and wilderness values. Some of the concerns included:

- Roads as vectors for noxious weed spread
- Protection of critical breeding periods
- Impaired water quality from roads
- Lack of site-specific information on stream crossings

Local Native American tribes supported a balance between protection of natural resources and access, and felt the travel plan decision was a very positive step toward forest and wildlife health.

5. Transportation Management and Planning

Transportation management and planning included the following concerns:

- The need for accurate Road Inventories and identifying the current condition
- Road maintenance and associated costs
- How the Travel Management Plan was going to be implemented

6. Planning Process and Public Involvement

The concerns about the planning and public involvement processes focused on four areas:

- Public participation - how, where, and when the Forest Service communicated with the public
- Disagreements with the findings and science used in the analysis in the FEIS
- Information requests, and the availability and accuracy of information
- Rules associated with the planning process (Travel Management Rule, Clean Water Act, Federal land Policy and Management Act, NEPA, ESA, RS2477, Appeal Process etc.)

7. Social-Economic

The majority of the appeals and non-supportive unique letters pointed out that it was inappropriate to combine social issues with economic issues because the social issue related to the customs and culture of the people who live near the WWNF was not adequately or correctly captured or analyzed. Many expressed concern the Forest Service didn't consider the economic effects of the Travel Management Plan.