

## Appendix "C" All Concern Statements

The following is a list of all public concern statements generated during the content analysis process for the appeals and letters received between March 16, 2012 and June 14, 2012 for the Wallowa-Whitman National Forest Travel Management Plan project. The title above each concern statement is the main area of concern category that the concern statement was grouped under in the Content Analysis Report. For a complete listing of the actual public comments associated with each of these concern statements, refer to Appendix D.

### **PLANNING PROCESS/PUBLIC INVOLVEMENT**

#### **001: The Forest Service should leave the following roads and trails open for motor vehicle use.**

- Because the Forest Service acted in an arbitrary and capricious way

### **GENERAL NON-SUPPORT**

#### **002: The Forest Service should review the decision to close roads.**

- To be consistent with the original mission of the Forest Service
- To avoid the appearance of the Forest Service serving an extreme agenda
- Because closing the roads to motor vehicles will essentially close the area to most users

### **RECREATION MANAGEMENT**

#### **003: The Forest Service should avoid closing roads.**

- To ensure the preservation of recreational opportunities consistent with state-wide goals
- To preserve freedom and public access to public lands
- Because enough land is already non-motorized and unavailable to motorized recreation
- To preserve access for senior and disabled citizens and veterans
- To preserve access to recreation, forest products, and hunting

### **RECREATION MANAGEMENT**

#### **004: The Forest Service should leave the following roads and trails open to motorized vehicle use for**

- Hunting, fishing, berry picking, mushrooming
- Firewood gathering
- Camping
- Viewing scenery and history
- Fire suppression
- Motorcycle riding
- Maintaining the quality of the human environment
- Social, economic, and recreational purposes which are a part of the local culture, businesses, and economies
- Access for the elderly and disabled citizens
- Future generations and to preserve educational opportunities
- Mining
- Access to private inholdings

#### **005: The Forest Service should move forward with the Travel Management Plan.**

##### **A. Planning Process/Public Involvement**

- To ensure that the travel planning process is respected throughout the region
- Because the process has been fair and open

## Appendix "C" All Concern Statements

- Because science rather than politics should drive the decision
- Because it protects tribal rights

### **B. General Support**

- Because the illegal removal of road closure signs should not be rewarded
- Rather than being unduly influenced by a political minority
- Because the majority of the public prefers to limit motorized access

### **C. Natural Resource Protection**

- To protect valuable habitat
- To protect the forest from impacts of motorized vehicles
- Because the road closures are needed to protect listed anadromous fish species
- Because it would reduce road densities

### **D. Recreation Management**

- Because the plan balances the needs of motorized and non-motorized users
- Because sufficient open roads remain
- To promote cleaner air and quiet recreation

### **PLANNING PROCESS/PUBLIC INVOLVEMENT**

**006: The Forest Service should improve their decision-making process.**

### **PERMITTED/ADMINISTRATIVE/MINING**

**008: The Forest Service should acknowledge that the Travel Management Plan process limits their authority.**

- To control woodcutting, livestock herding, fence maintenance, and mining

### **PLANNING PROCESS/PUBLIC INVOLVEMENT**

**009: The Forest Service should ensure that the plan reflects the nature of the local forest and the local stakeholders.**

- Rather than a minority of users
- Rather than Forest Service staff who are not long-term state residents
- Rather than people from the east coast

### **PLANNING PROCESS/PUBLIC INVOLVEMENT**

**12: The Forest Service should ensure that the Travel Management Plan reflects the input of the public.**

- To ensure that cultural and personal impacts of road closures are adequately considered
- To ensure that the needs of the OHV community are considered and addressed
- To prove the public was heard
- Because a significant number of people participated and commented on the plan; these comments need to be considered
- To preserve cultural and historical traditions
- Including public-provided maps and information which was not taken seriously
- As well as city and county governmental agencies

### **GENERAL NON-SUPPORT**

**13: The Forest Service should revise the Travel Management Plan to close fewer roads.**

- To better reflect the public's preference
- Because the USFS did not listen to the public and what they want
- To preserve our Constitutional rights

## Appendix "C" All Concern Statements

- Because public roads should be available to the public
- To reduce the severity of the decision
- Because the roads were financed with public money and should remain accessible to the public
- To be consistent with American values and to preserve freedom
- To preserve access for taxpayers

### PLANNING PROCESS/PUBLIC INVOLVEMENT

#### 14: The Forest Service should improve their public outreach.

- To better communicate the intent and content of the Travel Management Plan
- To ensure that the public is appropriately engaged in the process
- To ensure that the public's comments are responded to and accounted for
- And provide public notice of meetings and document availability
- To include people who live outside of the area but use the WWNF
- To appropriately include the opinions of taxpayers
- To explain how the public can comment on the plan

### PLANNING PROCESS & PUBLIC INVOLVEMENT

#### 15: The Forest Service should avoid closing roads.

- Because they don't have the legal right to close the roads
- To comply with local, state, and federal law

### PERMITTED/ADMINISTRATIVE/MINING

#### 16: The Forest Service should avoid closing roads

- To support the timber industry
- To provide for access to Private lands, mining claims, grazing lands, and water right access for private and municipal watersheds
- To preserve access for emergency services
- To allow for forest management activities to occur

### SOCIO-ECONOMIC

#### 17: The Forest Service should avoid closing roads

- To retain them for future generations
- To preserve educational opportunities for children
- So we can continue to enjoy the forests with our families for the rest of our lives
- To maintain our traditional uses

### RECREATION MANAGEMENT

#### 18: Seasonal limitations for snowmobile routes should have been evaluated in relation to the year round uses on other roads in the area.

### PERMITTED/ADMINISTRATIVE/MINING

#### 19: The Forest Service must realize that the motor vehicle access to the following roads is needed during the summer so they can be logged out for grooming snowmobile trails in the winter.

### NATURAL RESOURCE PROTECTION

#### 21: The Forest Service should proceed with the plan to close roads.

- To improve water quality and wildlife habitat

## Appendix "C" All Concern Statements

- To protect old-growth forests, riparian areas, wildlife habitat, and quiet recreation opportunities
- To protect the natural environment
- Because it is fiscally prudent
- To prevent noxious weed spread
- To comply with Executive Order 13443

### RECREATION MANAGEMENT

#### 22: The Forest Service should ensure that roads are open to the public.

- Not just ranchers, private land owners, and timber companies

#### 23: The Forest Service should remand the Travel Management Plan, reconsider the need to close roads, and conduct additional NEPA analysis.

##### A. Planning Process – Laws/Rules/Policy

- To appropriately address the impact and significance of the action
- To address the direct and cumulative effects of the action
- Because they did not consider a sufficient range of alternatives
- To be consistent with the U.S. Constitution
- To ensure the plan is consistent with the 1990 Forest Plan
- To ensure that road inventories are complete and accurate
- To comply with NEPA and other laws and policies
- To avoid the appearance of being arbitrary and capricious
- Because closing roads is unconstitutional
- To avoid overstepping their authority and the poor use of tax dollars

##### B. Transportation Management

- Because scarce tax dollars should be spent elsewhere

##### C. Permitted/Administrative/Mining

- To preserve access for timber sales
- Because scarce tax dollars should be spent elsewhere
- To ensure public safety and forest health

##### D. Planning Process and Public Involvement

- Because insufficient public notice was provided
- Because the plan did not incorporate public opinion
- To ensure that the process is fair and open, and appropriate coordination occurred

##### E. Socio-Economic – Custom and Culture

- To preserve access for taxpayers and ensure healthy forests
- To preserve access for the local public
- To better reflect the will of the public
- Because many motorized users are good stewards
- Because sufficient roads are already closed
- To ensure that effects on the human environment are addressed
- To consider the effects on citizens who depend on the forest for food, fuel, and income

### RECREATION MANAGEMENT – USER CONFLICTS

#### 24: The Forest Service should address the problem of enforcement.

- Especially the illegal use of non-motorized trails by motorized vehicles

Appendix "C"  
All Concern Statements

**GENERAL NON-SUPPORT/SUPPORT AND OPTIONS**

**25: The Forest Service should consider other or additional management options.**

- Such as hiring managers for trouble areas or use a permit system
- Such as promoting this as an opportunity to support special uses to provide access into areas with closed roads such as outfitters
- Such as providing some ORV scramble areas in non-sensitive resource areas
- Such as developing a fee-based license for ATV users to pay for enforcement
- Such as create a reporting system to allow the public to report violations
- Such as working with the State to license ORVs to improve identifying law breakers
- Such as partnering with local groups to improve road and sign maintenance and public education
- Remove roads and fences in elk habitat
- Close some hunting units for a period of time to repopulate elk herds
- Issue permits or passes for big game retrieval
- Adjust closure periods or use green dot system
- Establish more seasonal closures instead of year round closures during hunting season
- Remove all livestock from public lands

**TRANSPORTATION MANAGEMENT**

**26: The Forest Service should grant enforcement responsibility to local law enforcement agencies.**

- To address the costs of enforcement

**PERMITTED/ADMINISTRATIVE/MINING**

**27: The Forest Service should ensure that access to the municipal water sources of Halfway, La Grande, and Sumpter are preserved.**

- To allow access for maintenance and operations

**NATURAL RESOURCE PROTECTION**

**29: The Forest Service should examine needed levels of coarse wood for long-term soil productivity.**

- While balancing the needs of mixed fire severity ecosystems

**PLANNING PROCESS**

**30: The Forest Service should evaluate the effect of closing roads on wildfire suppression.**

- To ensure that the plan won't increase the potential for increasing wildfire size and severity

**PERMITTED/ADMINISTRATIVE/MINING**

**32: The Forest Service should analyze the effects of closing roads that are needed for fire suppression.**

**GENERAL NON-SUPPORT/SUPPORT**

**34: The Forest Service should acknowledge that roads have not been the cause of recent forest fires.**

**PLANNING PROCESS/PUBLIC INVOLVEMENT**

**35: The Forest Service made incorrect assumptions, used inaccurate scientific findings, or provided inadequate information for big game effects**

- Hikers are more disruptive to wildlife than motor vehicles.
- Predation is a larger issue than the effect of motor vehicles to big game
- Vehicle travel does not impact wildlife or game

## Appendix "C" All Concern Statements

- Starkey big game studies are skewed and do not accurately depict how free ranging animals react
- Because logging and roads do not decrease big game populations
- Closing roads will lead to increases in wolf populations

### PLANNING PROCESS/PUBLIC INVOLVEMENT

#### **36: The Forest Service made incorrect assumptions, used inaccurate scientific findings, or provided inadequate information for effects to recreation and natural resources**

- Because roads are not the primary cause of the spreading of invasive plants
- Should provide evidence that specific roads and trails are a problem for fish or wildlife
- ATV's cause only minor damage
- Poor timber management and road decommissioning create more damage than an ATV
- No scientific data exists to define excessive noise levels; therefore, noise levels should not be used for road closure decisions
- Because rocked roads do not cause damage and erosion
- Record steelhead runs have been experienced which contradicts the need to close roads to protect fish
- Cattle grazing does more damage than roads

### PERMITTED/ADMINISTRATIVE/MINING

#### **40: The Forest Service should avoid restricting access to the collection of wood for personal firewood, commercial firewood, and posts and poles.**

- Because such limitations are outside the authority of the Forest Service
- To avoid creating unreasonable hardships and expense
- To avoid increased erosion, the taking of green trees, and increasing fuel loads
- Because most of the firewood near the main roads is already gone
- Because use of firewood reduces the carbon footprint of local residents
- Because firewood collection reduces fuel loads on the forest

### PLANNING PROCESS/PUBLIC INVOLVEMENT

#### **41: The Forest Service should avoid reopening the NEPA process for the Travel Management Plan.**

- Because the process has been consistent with NEPA, the Travel Management Rule, the ESA, and federal trust responsibilities to tribes while providing reasonable public access

### PLANNING PROCESS/PUBLIC INVOLVEMENT

#### **44: The Forest Service should reissue the Record of Decision and provide improved communication about the process and how public comments were used.**

- To comply with NEPA and reduce public outcry

### GENERAL NON-SUPPORT/SUPPORT

#### **48: Out of Scope, no clear comment, or other issue.**

### PLANNING PROCESS/PUBLIC INVOLVEMENT

#### **49: The Forest Service should acknowledge that the Travel Management Plan constitutes a significant amendment to the Forest Plan.**

- As defined by the NEPA Handbook
- Because closing a large portion of the forest to vehicular traffic is a significant change

## Appendix "C" All Concern Statements

- Because problems with road densities in the 1990 Forest Plan are not a sufficient reason for avoiding a significant amendment
- Because closing large areas of the forest to cross-country travel is a significant change
- Because the changes would create inconsistencies in the Forest Plan

### **SOCIO-ECONOMICS**

#### **50: The Forest Service should consider the economic effects of the Travel Management Plan.**

- On the local communities
- On local businesses
- On local home prices
- On small local communities
- On Union County from loss of tourism
- On Baker, Union, and Wallowa Counties' tourism
- On northeastern Oregon
- Including the cumulative effects on businesses
- To comply with the law
- On tax revenue
- On recreation-based businesses
- Including growth-inducing effects

### **PLANNING PROCESS/PUBLIC INVOLVEMENT**

#### **51: The Forest Service failed to take a hard look at the cumulative effects of the Travel Management Plan.**

- To comply with the law
- Including the effects on traditional uses
- Including the effects from concentrating use in smaller areas
- Including the effects of pushing users out of one area and into another area
- Including the increases in fire hazard from lack of firewood cutting

### **PLANNING PROCESS/PUBLIC INVOLVEMENT**

#### **52: The Forest Service failed to take a hard look at the direct and indirect effects of closing roads and trails**

- On the human and physical environment
- On families
- On disabled veterans
- On recreation opportunities
- On local communities
- On fish habitat in concentrated use areas

### **PLANNING PROCESS/PUBLIC INVOLVEMENT**

#### **56: The Forest Service should inform respondents about project progress and add them to the mailing list.**

### **PLANNING PROCESS/PUBLIC INVOLVEMENT**

#### **57: The Forest Service should provide additional information about the appeal process to the public.**

- Including a list of respondents who are eligible to appeal

## Appendix "C" All Concern Statements

- Including how to gain standing for an appeal
- Including the dates of the comment period/appeal period

### PLANNING PROCESS/PUBLIC INVOLVEMENT

**58: The Forest Service should provide additional information and improve the Forest website so the travel management information is easier to find.**

- Including the location of maps
- Including a complete map and road closure list
- Including the dates of the comment period
- Including a copy of the Travel Management Plan

### GENERAL SUPPORT

**61: The Forest Service should publish the number of people who supported the Travel Management Plan.**

- To provide a more balanced view of the public's position

### SOCIO-ECONOMIC

**62: The Forest Service should consider the effects of the plan on people on fixed or limited incomes.**

- Because the forest is a source of fuel, food, and low-cost recreation
- Because road closures will reduce access to low-cost recreation opportunities

### NATURAL RESOURCE PROTECTION

**67: The Forest Service should close more roads.**

- To protect habitat and natural resources
- To protect riparian areas
- To protect important unroaded areas

### PLANNING PROCESS/PUBLIC INVOLVEMENT

**68: The Forest Service did not solicit public feedback on the gates and water bars which have been installed on roads over the years.**

### PLANNING PROCESS/PUBLIC INVOLVEMENT

**71: The Forest Service should clarify that confusion about the plan does not reside with the public.**

- Rather the confusion exists within the Forest Service

### PLANNING PROCESS/PUBLIC INVOLVEMENT

**74: The Forest Service should replace the local forest officers.**

- Because they failed to appropriately consider public input
- Because they were out of touch with what is important to the local communities

### TRANSPORTATION MANAGEMENT

**75: The Forest Service should provide for sufficient enforcement of the plan.**

- Because increasing enforcement might allow for more roads to remain open
- Because there are currently too few law enforcement officers

Appendix "C"  
All Concern Statements

**GENERAL SUPPORT/NON-SUPPORT**

**78: The Forest Service should reveal the number and type of recent citations.**

- To demonstrate that there is a need for increased control of motorized use

**PLANNING PROCESS**

**80: The Forest Service should analyze the effect of insufficient past enforcement efforts.**

- On natural resources

**TRANSPORTATION MANAGEMENT**

**81: The Forest Service should reconsider the plans to limit road signage.**

- Because it's unreasonable to expect users to be aware of which roads are closed

**PERMITTED/ADMINISTRATIVE/MINING**

**82: The Forest Service should make sure that water rights holders are notified of road closures and have access to their facilities.**

- Because they need to be able to maintain ditches and water conveyance systems
- Because access is needed for operations and maintenance of facilities
- And analyze the effects of this plan on their ability to maintain, service, and access water conveyance systems
- To comply with applicable laws

**PLANNING PROCESS**

**83: The Forest Service should analyze the current sediment rates in fish-bearing streams in affected drainages.**

**PLANNING PROCESS/PUBLIC INVOLVEMENT**

**85: The Forest Service should produce an atlas of roads that are designated as open.**

- To comply with NEPA, the Forest Service Manual, and the policy for multiple use
- To comply with the Travel Management Rule

**PLANNING PROCESS/PUBLIC INVOLVEMENT**

**86: The Forest Service should confirm that federal, state, and local officials were appropriately notified.**

- And were provided with copies of the draft document

**GENERAL NON-SUPPORT**

**87: The Forest Service should reduce staffing significantly.**

- Because the reduction in access should reduce management needs

**PLANNING PROCESS**

**88: The Forest Service should include Wilderness Areas and National Recreation Areas within the plan.**

- To give a more accurate picture of the effects of the plan

**SOCIO-ECONOMICS**

**93: The Forest Service should ensure access to forest products.**

- To preserve the way of life in eastern Oregon
- To preserve opportunities for future generations

## Appendix "C" All Concern Statements

- To preserve access for senior citizens with limited income
- Because the forest is a source of fuel, food, and recreation
- To avoid causing economic hardships to local citizens dependent on these products
- To preserve access for senior citizens with limited mobility

### RECREATION MANAGEMENT

#### **94: The Forest Service should reconsider the 300-foot restriction.**

- Because it will limit access to firewood and game animals
- Because it will result in greater disturbances
- Because it will be difficult to enforce
- Because the distance is arbitrary and lacking rationale to support it
- Because it will limit dispersed camping

### PLANNING PROCESS

#### **96: The Forest Service should analyze the effects of restricting access to forest products.**

- Including the effect on historical and cultural heritage
- Including cumulative effects to edible forest products and fuel loads and resulting fires
- Including economic effects
- To comply with NEPA

### PLANNING PROCESS

#### **100: The Forest Service should analyze the aesthetic, historic, cultural, economic, social, and health effects of road closures.**

- On the residents of the communities and counties within the plan area
- Including collection of forest products
- Including mineral prospecting
- To comply with NEPA

### PLANNING PROCESS

#### **102: The Forest Service should analyze the effects of road closures on the handicapped, people with special needs, and the elderly.**

- To comply with the Americans with Disabilities Act
- To preserve access for taxpayers
- Including the economic effects

### RECREATION MANAGEMENT

#### **104: The Forest Service should preserve forest access for senior citizens and the disabled.**

- To preserve their quality of life
- To preserve access for taxpayers
- And for disabled veterans
- For their safety
- To comply with the Americans with Disabilities Act

### PLANNING PROCESS/PUBLIC INVOLVEMENT

#### **106: The Forest Service failed to take input from local, state, and other federal officials**

- To ensure that the plan is consistent with state and local plans

## Appendix "C" All Concern Statements

- To comply with NEPA
- To reduce duplication of requirements

### PLANNING PROCESS

**107: The Forest Service should analyze the environmental justice effects on minority and low-income populations.**

- To comply with Executive Order 12898
- Because the plan will disproportionately affect low-income communities

### RECREATION MANAGEMENT

**109: The Forest Service should acknowledge that closing roads will reduce public safety and increase the potential for road and resource damage.**

- By exposing the public to greater risk from predators
- By exposing the public to increased violence from people
- By closing emergency routes
- By reducing reports of hazards and reducing access for missing person searches
- By increasing the presence of drug traffickers
- By increasing the number of accidents
- Because concentrating motorized use into small areas will cause more environmental problems and require more enforcement
- By putting full sized and smaller vehicles on the same roads
- By concentrating hunters into smaller areas which cause accidental shootings

### SOCIO-ECONOMIC

**110: The Forest Service should preserve access to historical sites.**

- Including old mines and mining towns
- To comply with the mining law
- For future generations

### PLANNING PROCESS

**111: The Forest Service should analyze the effects of closing historic roads.**

- Because it will have an economic effect in Baker County

### SOCIO-ECONOMIC

**114: The Forest Service should acknowledge the mental and physical health impacts of closing roads.**

- On local citizens
- On senior citizens in communities near the forest

### RECREATION MANAGEMENT

**115: The Forest Service should maintain access to the forests for veterans.**

- To avoid discriminating against them

### PLANNING PROCESS

**119: The Forest Service should engage in arbitration.**

- Because the negotiations were unfair and didn't comply with NEPA

## Appendix "C" All Concern Statements

### PLANNING PROCESS

**121: The Forest Service should ensure that the Travel Management Plan is consistent with the current Forest Plan.**

- To protect wildlife habitat and threatened and endangered species
- To comply with NFMA
- To protect soil productivity

### GENERAL NON-SUPPORT/SUPPORT

**123: The Forest Service should reconsider closing some roads and trails.**

- Because they have no impact on fisheries

### PLANNING PROCESS

**125: The Forest Service should ensure that proper consultation with the National Marine Fisheries Service is undertaken.**

- To comply with the Endangered Species Act

### PLANNING PROCESS/PUBLIC INVOLVEMENT

**126: The Forest Service should conduct a site-specific analysis of every forest road.**

- To comply with NEPA for designating all non-system and user-created routes
- To ensure that sites meet PACFISH/INFISH or Forest Plan standards and guidelines
- To identify mitigation measures to protect fisheries habitat
- To comply with the direction in the Forest Plan
- To prove a negative impact from a road before closing it
- To allow for more focused public involvement and ensure that public comments are considered
- Which is tiered to the Forest Plan
- Particularly the elk and mule deer studies

### TRANSPORTATION MANAGEMENT

**133: The Forest Service should acknowledge that insufficient funds and staff are available for enforcement.**

### SOCIO-ECONOMIC

**134: The Forest Service should analyze the social and cultural effects of the Travel Management Plan.**

- Including the effects on family recreation
- Including the effects on quiet recreation
- On future generations
- On traditional cultural properties and activities
- On senior citizens
- To comply with NEPA
- On access to family history sites
- On veterans

### NATURAL RESOURCE PROTECTION

**139: The Forest Service should address protection of roadless areas, old-growth forests, water quality, and wildlife habitat.**

- During this pause in the travel management process

Appendix "C"  
All Concern Statements

**PLANNING PROCESS/PUBLIC INVOLVEMENT**

**140: The Forest Service should provide color maps showing proposed road closures.**

- To ensure that sufficient analysis of the closures has been conducted
- To facilitate the public's ability to comment and provide feedback
- Because a lot of people do not have computers to access the colored maps on the web or on the CD

**PLANNING PROCESS/PUBLIC INVOLVEMENT**

**143: The Forest Service should provide sufficient notice to affected landowners.**

- To comply with the law

**PLANNING PROCESS/PUBLIC INVOLVEMENT**

**144: The Forest Service should improve the water quality analysis.**

- To comply with NEPA, the Endangered Species Act, and NFMA

**PLANNING PROCESS**

**146: The Forest Service should revisit their analysis of snags.**

- Because the information they used is out of date

**RECREATION MANAGEMENT**

**151: The Forest Service should value non-motorized users equally to motorized users.**

- Because the land belongs to all Oregonians, not just horses, hikers, and bikers

**PLANNING PROCESS**

**159: The Forest Service should consider the effects of fuel loads on the plan.**

**GENERAL NON-SUPPORT**

**167: The Forest Service should admit that they are closing roads to hide the results of logging.**

**PLANNING PROCESS**

**169: The Forest Service should list the species that need snags to survive.**

**PLANNING PROCESS**

**175: The Forest Service should consider the best available scientific research to support the protection of roadless areas.**

- To comply with NEPA and other laws
- To display the effects of designating roads and trails within roadless areas

**GENERAL NON-SUPPORT/SUPPORT - OPTIONS**

**179: The Forest Service should ensure that the public is informed of road closures and fines.**

- And ensure that roads are clearly marked
- Because such severe fines will disproportionately affect accidental trespassers

**PERMITTED/ADMINISTRATIVE/MINING**

**183: The Forest Service should explain how roads will be closed.**

- And describe what methods will be used
- And what the impact to emergency services will be from those closures

**TRANSPORTATION MANAGEMENT**

**185: The Forest Service should avoid funding the closing of routes.**

- To save money

**PLANNING PROCESS**

**186: The Forest Service should analyze the cumulative effect on salmon recovery caused by restricting firewood collection and increasing the need for hydroelectric power.**

**PLANNING PROCESS**

**195: The Forest Service should analyze the effects of each road in each drainage.**

- To establish a benchmark condition for fish and water impacts to justify the need to close roads

**PLANNING PROCESS**

**203: The Forest Service should do a complete analysis the effects of the plan on soil erosion.**

- Including the impacts of motorized and non-motorized uses on erosion rates
- Including the potential for increased erosion in areas where dispersed camping is concentrated
- And consider other options for decreasing erosion rather than just closing roads

**PERMITTED/ADMINISTRATIVE/MINING**

**204: The Forest Service should analyze the economic effects on mineral exploration from the plan.**

- Because it will increase the costs of new mining activities
- Because jobs will be lost

**PERMITTED/ADMINISTRATIVE/MINING**

**205: The Forest Service should ensure that normal coordination requirements are met for mining exploration.**

- To comply with mining law

**PERMITTED/ADMINISTRATIVE/MINING**

**206: The Forest Service should leave open all roads in mineralized areas, as long as they are not causing resource damage.**

- To comply with mineral law

**PERMITTED/ADMINISTRATIVE/MINING**

**207: The Forest Service should preserve access to traditional mining areas.**

- For future generations

**PLANNING PROCESS**

**212: The Forest Service should analyze effects on threatened and endangered species for each road and trail.**

**NATURAL RESOURCE PROTECTION**

**216: The Forest Service should recognize that wildlife benefits from less motorized use of roads.**

Appendix "C"  
All Concern Statements

**NATURAL RESOURCE PROTECTION**

**218: The Forest Service should prohibit fords across fish-bearing streams.**

- To avoid creating degraded habitat for steelhead and salmon

**PERMITTED/ADMINISTRATIVE/MINING**

**239: The Forest Service should allow motorized access to grazing allotments.**

- To allow for management of livestock

**PERMITTED/ADMINISTRATIVE/MINING**

**240: The Forest Service should avoid requiring permits to access roads for already permitted activities.**

- Also because such a change constitutes a taking that must be compensated

**PLANNING PROCESS**

**242: The Forest Service should reconsider requiring permits of Native Americans exercising their tribal treaty rights.**

- To avoid violating treaties

**PERMITTED/ADMINISTRATIVE/MINING**

**243: The Forest Service should protect access to valid existing mining rights.**

**TRANSPORTATION MANAGEMENT**

**246: The Forest Service should provide for sufficient maintenance.**

- To avoid additional environmental damage
- To avoid closing roads unnecessarily
- Or downsize the road system to fit within the maintenance budget

**GENERAL SUPPORT - OPTIONS**

**247: The Forest Service should prohibit all cross-country travel.**

- Until a final plan is adopted

**TRANSPORTATION MANAGEMENT AND PLANNING**

**249: The Forest Service should complete an accurate inventory of roads.**

- To comply with the national protocol
- To ensure that road designations are properly considered
- To clarify which roads will be open and which closed
- To facilitate the travel management planning process

**TRANSPORTATION MANAGEMENT AND PLANNING**

**250: The Forest Service should provide clear definitions of forest roads.**

**TRANSPORTATION MANAGEMENT**

**253: The Forest Service should provide an accurate assessment of maintenance costs.**

- That takes into account the work done by citizens
- To ensure an honest accounting

**NATURAL RESOURCE PROTECTION**

**256: The Forest Service should move forward with their proposed road rehabilitation measures.**

- To protect resources

**GENERAL NON-SUPPORT/SUPPORT - OPTIONS**

**257: The Forest Service should reconsider the "closed unless marked open" policy for roads.**

- Because it places undue stress and hardship on the public

**PLANNING PROCESS**

**259: The Forest Service should disclose the potential effects from specific roads before determining whether to close them.**

- To determine the impact on people, the remaining roads, and natural resources

**RECREATION MANAGEMENT**

**266: The Forest Service should consider the loss of access to visual resources.**

**PLANNING PROCESS/PUBLIC INVOLVEMENT**

**267: The Forest Service should analyze the effects of limiting motorized recreation.**

- On the potential for increasing trespassing on adjacent private lands

**PLANNING PROCESS**

**271: The Forest Service should include public input in the amended Forest Plan direction for the recreation standard.**

**RECREATION MANAGEMENT**

**276: The Forest Service should provide for RV camping.**

**RECREATION MANAGEMENT**

**279: The Forest Service should provide opportunities for quiet recreation for motorized users.**

**RECREATION MANAGEMENT**

**282: The Forest Service should reconsider limiting motorized roads and trails by vehicle type.**

- To allow for multi-generational recreation

**RECREATION MANAGEMENT**

**284: The Forest Service should provide for 4WD Jeep use in the plan.**

**PLANNING PROCESS**

**285: The Forest Service must show that the travel management plan minimized the effects of ORVs on natural resources and conflicts with motor vehicle uses and users.**

- To comply with the minimization criteria from the Travel Management Rule at 36 CFR Section 212.55
- And Executive Order 11644

**RECREATION MANAGEMENT**

**286: The Forest Service should restrict ATVs to the same roads that full-size vehicles are limited to.**

- And not be allowed to go off road except for big game retrieval

Appendix "C"  
All Concern Statements

**PERMITTED/ADMINISTRATIVE/MINING**

**287: The Forest Service should analyze the effects of road closures on groomed snowmobile trails.**

- Because they need to be logged out in the summer before they are covered with snow

**PERMITTED/ADMINISTRATIVE/MINING**

**293: The Forest Service should clearly define the process for obtaining permits for managing grazing allotments.**

**SOCIO-ECONOMIC**

**298: The Forest Service should analyze the effects of limiting motorized hunting access.**

- Including economic effects from reduced hunting
- To ensure that Wildlife Want and Waste rules can be complied with

**RECREATION MANAGEMENT**

**300: The Forest Service should maintain access to dispersed camping sites.**

- Because they have been used for generations
- To preserve opportunities for solitude
- To avoid over concentration of camping
- To avoid user conflicts that result from overcrowding
- To prevent overuse and resource damage

**RECREATION MANAGEMENT**

**302: The Forest Service should restrict motorized vehicle use for hunting.**

- To improve big game habitat
- To improve the hunting experience

**NATURAL RESOURCE PROTECTION**

**305: The Forest Service should protect all roadless areas including the Twin Mountain, Boulder Park, Joseph Canyon, Reservoir, Castle Ridge, Mount Emily, and Squaw Inventoried Roadless Areas from motorized use.**

- Because they serve important ecological needs

**PLANNING PROCESS**

**310: The Forest Service should preserve access to RS 2477 roads.**

- To comply with the mining law
- Because they are owned by the County who should be the ones to control usage
- Because the Forest Service has no right to manage/close these routes

**SOCIO-ECONOMIC**

**312: The Forest Service should analyze the effects on funding to both the Forest Service and Oregon Fish and Game Commission.**

- From the loss of permit revenue

**PERMITTED/ADMINISTRATIVE/MINING**

**320: The Forest Service should leave roads and trails open to motorized vehicle use**

- To provide access to private inholdings in the national forest.

## Appendix "C" All Concern Statements

- And respect valid existing rights to access those inholdings.
- To facilitate communication between landowners in remote areas
- To be consistent with multiple use requirements for National Forests and the law
- To comply with mining laws

### PERMITTED/ADMINISTRATIVE/MINING

#### **321: The Forest Service needs to provide access and opportunities for firewood gathering and collecting forest products**

- Such as creating firewood areas
- Through the use of permits
- By matching seasonal closures to periods of firewood cutting
- To provide access for harvesting Christmas trees
- And develop a process to allow controlled firewood gathering to continue

### PLANNING PROCESS/PUBLIC INVOLVEMENT

#### **324: The Forest Service should provide clarification to the public about the following specific roads, trails, maps, and information provided.**

- Improve the maps to make them more understandable
- Add road number for roads not designated on the map
- To facilitate public involvement
- To correct errors and omissions on the map
- To provide for careful review
- To include historic roads and trails
- To clarify map legends
- To tell when areas will be open or closed for hunting
- On how to acquire a handicapped permit for hunting

### PLANNING PROCESS

#### **325: The Forest Service should revisit aspects of the FEIS**

- By considering the No Action alternative
- And select Alternative 1 because it would be less costly, protects access for motorized recreation, and has less effects on the human environment than the preferred alternative
- And clarify why the preferred alternative was not selected
- And select an alternative other than the preferred alternative since there are insufficient funds to implement that alternative, which violates the Forest Plan.
- And select Alternative 6, which protects resources and complies with the Travel Management Rule and Executive Order 11644.
- And select Alternative W, the Wallowa County-preferred alternative
- And select the Union County alternative
- Provide rationale for why certain alternatives were not considered or selected in the decision

### PLANNING PROCESS

#### **326: The Forest Service has illegally closed roads in the past without public input**

### NATURAL RESOURCE PROTECTION

#### **327: The Forest Service should close roads and trails in the following area to motor vehicle use.**

- To protect natural resources