



January 18, 2019

Nikki Swanson,
Sweet Home District Ranger
Willamette National Forest

VIA: <https://cara.ecosystem-management.org/Public//CommentInput?Project=53520>

RE: Calapooia Draft EA

Please consider the following comments of Cascadia Wildlands regarding the Calapooia Draft EA.

Cascadia Wildlands is a public interest nonprofit organization dedicated to defending the land, waters and wildlife of the Cascadia Bioregion in the forest, in the courts, and in the streets. *See* www.cascwild.org. We have been involved in NEPA processes on the Willamette National Forest since our inception over twenty years ago, and remain keenly interested in these forests.

The proposed action would log 1,132 acres of forest stands with a commercial thinning prescription. 283 of these acres are located in riparian reserves, with the remainder in general matrix. The project also includes designation of the minimum road system, with 51 miles of road reconstruction, a mile of new temporary road construction, five miles of road decommissioning, establishment of a day-use area along the Calapooia River, and some 843 acres of weed treatments.

As a general comment, Cascadia Wildlands greatly appreciates the fact that logging is commercial thinning targeted on previously logged, densely stocked plantations, and that serious attention is being paid to the transportation network in terms of the minimum road system. These are great priorities and the Forest Service deserves commendation for pursuing them. We also appreciate the generally high quality of the analysis included in the EA. These comments are relatively brief, but we reviewed the EA and attachments in detail with great interest. Visualizations and photographs were especially helpful, and the care taken to cite specific scientific work with regard to silvicultural objectives and assumptions was appreciated. That harvest prescriptions in riparian areas were developed unit-by-unit in the field is also significant. We hope this approach yields positive economic and environmental benefits.

There are of course many areas of possible improvement, which we will highlight in a few brief comments. We also reviewed and support the comments of Oregon Wild on this project, which draw out a number of areas for improvement.

There are also some procedural devices being used here that, in another circumstance, could remain problematic. Most glaringly, we strongly feel that projects of this size are “significant” within the meaning of NEPA, and so an EIS ought have been prepared. The riparian thinning does not strike us as being adequately warranted under the ACS. The reasonable scale of this project, and the lack of regeneration harvest, is a major reason why we feel this project can, on balance, work.

We are concerned with effects of wet weather haul, particularly given the inherent difficulty and past failures to implement BMPs effectively. *See* EA @ 39 (listing wet weather criteria). We urge the Forest Service to avoid wet weather haul wherever possible. Where roads are hydrologically connected to streams the risk to fish habitat is substantial. Please ensure that adequate resources are available to support the needed monitoring and mitigation measures, and error on the side of caution in wet weather work.

We are similarly a bit uneasy with the precautions for slope stability. The EA indicates several soil/geology concern areas within units, including some in unit 52 that appear to flow right in to the river. EA @ 68. The EA relies on the sale layout process to eliminate unstable areas, which is not ideal.

It will continue to be important as the sale moves forward that wildlife and botanical surveys be accomplished and that legacy trees, wildlife trees, rare plants and the like are marked and buffered. The ability to account for this sort of highly site-specific value is a strength of a robust Forest Service presence in the field, and that legacy can be well-represented here.

Thank you for including the analysis of depleted summer streamflow caused by cumulative effects of clearcut logging. EA @ 78. That is a highly significant factor in regards to cumulative effects, and provides additional justification for the limited thinning and proposed road decommissioning.

Thank you also for recognizing the high value of aquatic resources, including clean water and fisheries. Cascadia members value these and other waters of the forest very highly for these resources, and are enthusiastic about efforts to restore what has been lost.

The EA analysis of the climate issue is not very high quality, which is a missed opportunity. The citation to Anderson & Palik, 2011 is helpful in understanding the Forest Service thinking in regards to resilience. And we appreciate that resilience to a changing climate is being considered in treatments. But as the cited studies indicate our understanding of how silviculture interacts with these factors is in its relative infancy. So, a precautionary approach is warranted, and monitoring of treatment effects is particularly valuable.

This project is located in northern spotted owl critical habitat, so we hope those concerns are taken seriously throughout implementation. There is a risk that thinning will be too heavy, and remove too much dead wood, to the ultimate detriment of the owl. Skips and other leave areas will be important, as will be retention of structural diversity. Please adopt some mechanism to ensure that untreated skips are retained in an untreated (or non-commercially treated condition) long enough to ensure they serve their intended purposes, such as recruitment of dead wood which can take a long time, maybe even indefinite.

With regard to the day-use area, the newly installed gate, and the road decommissioning, the EA does a good job of justifying these restrictions to public access and we support them. In the long run it makes sense that this more appropriately-scaled system will provide more and better public access to public lands. We would prefer that the Forest Service increase its presence in the field and

conduct more regular litter patrols, rather than banning overnight camping outright or installing gates, but the compromise here is a reasonable one. We hope with adaptive management that quality access will be provided.

Please continue to keep us apprised as this project moves forward.

Best,

A handwritten signature in black ink, appearing to read 'Gabriel Scott', is positioned above a thin vertical line.

Gabriel Scott, In-House Counsel

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