April 18, 2025

Darren Cross, District Ranger
McKenzie River Ranger District
Willamette National Forest
57600 McKenzie Highway
McKenzie Bridge, OR 97413

**In Reply To:** Calloway Project Draft EA

Dear Mr. Cross:

American Forest Resource Council (AFRC) is a regional trade association whose purpose is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies and decisions regarding access to and management of public forest lands and protection of all forest lands. AFRC represents over 50 forest product businesses and forest landowners throughout the West. Many of our members have their operations in communities adjacent to the Willamette National Forest, and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. The state of Oregon's forest sector employs approximately 61,000 Oregonians, with AFRC's membership directly and indirectly constituting a large percentage of those jobs. Rural communities, such as the ones affected by this project, are particularly sensitive to the forest product sector in that more than 50% of all manufacturing jobs are in wood manufacturing.

AFRC is pleased to see the McKenzie River Ranger District proposing vegetation management on lands designated as Adaptive Management Area, Late Successional Reserve, and Riparian Reserve that will likely provide useful timber products to our membership. Our members depend on a predictable and economical supply of timber products off Forest Service land to run their businesses and to provide useful wood products to the American public.

**STANDS DEFERRED FROM MANAGEMENT**

We are disappointed with the RD's decision to defer from management those stands which were initially identified for treatment during this project's scoping period but subsequently impacted by the Ore and Lookout Fires. Generally speaking, none of the stands impacted by these two fires resulted in meaningful tree mortality. In fact, during a recent field visit, virtually no fire-induced mortality was observed in any of the stands impacted by the Ore Fire. Photos 1-3 show stands which were impacted by the Ore Fire, and dropped from the draft EA. They are representative of most stands impacted by the 2024 incident.

There remains a need to manage these stands to improve stand conditions, density, diversity, and structure. We urge the RD to reconsider their decision to remove these stands from this project's final analysis. If the RD is unwilling to include stands impacted by the Ore and Lookout Fires in this project's final analysis, we urge the RD to utilize this project's analysis performed to-date in these areas for preparation into a separate analysis – possibly via categorical exclusion, or Determination of NEPA Adequacy (DNA). The timely treatment of these deferred stands should remain a priority for the RD.

**ROAD DECOMMISSIONING**

We are concerned with your Draft EA's proposal to decommission and remove 10 miles of existing road within the Calloway project area. Several roads slated for removal include haul routes which will be needed for near and long-term management of the Forest's land base. The following roads identified for decommissioning are particularly concerning to us:

- **Road 1508424**: Your Draft EA identifies 0.42 miles of Road 1508424 slated for decommissioning. Road 1508424 reaches 4-6 units within the Calloway project area. The removal of this road ensues that future management of these stands cannot occur.
- **Road 1509826**: Your Draft EA identifies one mile of Road 1509826 slated for decommissioning. Road 1509826 is a critical haul route for multiple stands which were originally proposed for management during the Calloway scoping period, but subsequently dropped following the 2024 Ore Fire (See Figure 1). As we urged in the above discussion, we are hopeful that these units can be included for management in a future project. Removal of this road would ensure that future management of these stands cannot occur.
- **Road 1506680**: is critical for hauling in and out of Calloway Unit 83. There is another unit directly west of Unit 83, however, which is not proposed for management in the Calloway EA, but where stand conditions are identical to Unit 83 (see Figure 2). In fact, they were clearcut and planted during the same timber sale. Exhibiting identical stand conditions as Unit 83, this deferred unit will eventually require the same management as Unit 83. If Road 1506680 is fully decommissioned, then future management of this stand will be operationally and economically unfeasible.

An intact road system is critical to the management of Forest Service land, particularly for the provision of timber products. Without an adequate road system, the RD will be unable to offer and sell timber products to the local industry in an economical manner. The road decommissioning proposed in the Calloway EA represents a permanent removal of these roads and likely the deferral of management of those forest stands that they provide access to. As your draft EA points out, the intent of Adaptive Management Areas (AMA) is to, among other objectives, provide "a stable timber supply." Removal of adequate access to these lands compromises the agency's ability to achieve this objective, and is very concerning to AFRC. We recommend that any road identified as a potential "haul route" for future timber sales should be deferred from decommissioning in the Calloway EA. Further, we urge the RD to consider for decommissioning only those sections of new road construction proposed in this draft EA.

**PCLs**

We are disappointed that the entire 56 miles (2,149 acres) of proposed PCL treatments in the Calloway EA will be restricted to non-commercial hand-thinning only. We understand the RD's hesitancy to propose commercial treatment in stands identified as RA32 that intersect with proposed PCL's. However, for the majority of proposed PCLs, that intersect plantations in the General Forest Management Allocation within the AMA, this decision is concerning to us for a number of reasons.

First, it is not clear to us what rationale the RD used to determine what intensity of management was necessary along these PCL's to create a resilient and fire-resistant stand condition. There is no discussion on desired relative density, crown continuity, inter-tree competition, or any other metric which would illustrate the effectiveness of proposed treatments. Instead, there is only a sweeping diameter cap of 7 inches in stands under 80 years old, and 9 inches in stands greater than 80 years old, with no stated reasoning. It's true that understory thinning will reduce the horizontal fuel profile within these PCLs. For fires originating from the PCL, this may help to minimize the likelihood of a fire quickly spreading into the crowns of adjacent overstory trees. But PCLs are not only meant to be effective at reducing the likelihood of conflagration at the point of ignition. Their effectiveness should also be measured in their ability to give firefighters an opportunity to control or suppress the volatility of an approaching crown fire.

Second, we worry that if a severe fire were to occur in this project area, and quickly overcame one of these PCL's, then that may undermine the perceived effectiveness of fuels reduction and tree thinning as a means of preventative forest maintenance. The public may view PCL's as ineffective when, in fact, the control lines were never adequately treated to begin with.

Finally, we are concerned with any project proposal which increases logging costs while also delivering less timber volume to local purchasers. As your Draft EA identifies, the majority of proposed PCL's will intersect with previously managed plantations. There should be little, if

any, concern for proposing treatments in stands that exhibit similar stocking and structure as stands proposed for commercial treatment elsewhere in the Calloway project area. Also, the requirement for hand thinning in these units will make treatment considerably more expensive when compared to mechanical thinning.

To further illustrate this point, please look at the appendix for Photos 4 and 5. Photo 4 shows a stand adjacent to a proposed PCL along Bear Pass Road (FS Rd. 1509000). The stand pictured is predominantly second-growth Douglas-fir with an approximate average stand diameter of 12 inches. If the RD were to implement the PCL treatments described in the Draft EA, very little removal will be permitted. The resulting stand will remain in the stem exclusion phase of succession with high crown competition and natural thinning will persist. Defending this road during a wildfire would likely present a challenge for firefighters. Contrast that with Photo 5, which shows a stand that was recently treated in the Blue Timber Sale. This stand, which was a plantation with similar stocking and composition as the previous stand pictured, now resembles a stand where firefighters would be able to reasonably defend the road as a control line. Additionally, the remaining trees will see increased diameter growth more quickly, improving stand resilience.

Again, we agree that some form of fuels treatment is necessary along these proposed PCL's to prepare the landscape for the inevitable future wildfire. We also understand that many of these PCL's will intersect with stands that require only pre-commercial treatment in order to be meet desired stand condition. We only contend that, when determining management intensity along these PCL's, there should be more consideration than a single, arbitrary, one-size-fits-all diameter limit. **We urge the RD to reconsider this approach and allow commercial removal within proposed PCL's, wherever appropriate. Further, we urge the RD to permit mechanical removal within PCL's where resource impacts can be mitigated as described in your PDF's for ground-based machinery.**

**ECONOMICS AND OPERATION**

We are pleased that the RD has analyzed the use of tethered assist (TA) logging as an acceptable method of yarding in the Calloway EA for slopes up to 70% within the Upper Blue River Watershed. TA is quickly becoming an industry-standard in Western Oregon. In the right circumstances, the practice is safer, more economical, and can even deliver greater resource protection than conventional logging operations.

**RIPARIAN RESERVES**

We are pleased to see the RD incorporate commercial thinning in some Riparian Reserves within the Calloway project. Often, stands proposed for thinning treatment in the uplands have the same undesired forest conditions (overly dense and uniform stands) in riparian areas. The forest health benefits that you expect to attain through upland thinning treatments can also be achieved in riparian areas with similar active management prescriptions. Allowing some commercial harvest

will not only produce usable forest products, but it will also promote greater resiliency in the Riparian Reserves.

**QUARRY DEVELOPMENT**

We are pleased to see the RD incorporate rock source development for existing quarries within the Calloway Planning Area. Maintaining a nearby rock source will help the economic viability of future timber sales resulting from the project. Similarly, we are also pleased to see the RD list mitigations necessary to reduce or eliminate weed spread as a result of hauling and applying rock. AFRC membership is aligned with the Forest Service's goal of minimizing the spread of noxious weeds resulting from harvest activities on federal land. It is in the best interest of the agency and contractors to make sure that forestry operations do not contribute to this growing issue on federal lands.

**WET SEASON OPERATIONS**

We appreciate your allowance in PDF Soils 1 for timber felling, skidding, and yarding during the wet season (October 15 - May 15) where "unusually dry conditions allow without soil compaction." And PDF Aquatics 27, which allows wet season haul where specific conditions are met. Constructing forest roads is essential if active management is desired, and we are glad that the RD is proposing the roads that are needed to access and treat as much of the project area as possible in an economically feasible way. Proper road design and layout should pose little to no negative impacts on water quality or slope stability. Consistent and steady operation time throughout the year is important for our members not only to supply a steady source of timber for their mills, but also to keep their employees working. These two values are intangible and hard to quantify as dollar figures in a graph or table, but they are important factors to consider. The ability to yard and haul timber in the winter months will often make the difference between a sale selling and not.

AFRC is happy to be involved in the planning, environmental assessment (EA), and decision-making process for Calloway Project. Should you have any questions regarding the above comments, please contact me at 541-521-9143 or cbingaman@amforest.org.

Sincerely,

Corey Bingaman
Western Oregon Field Coordinator
American Forest Resource Council

## APPENDIX

Photo 1: Calloway Unit 178. Dropped from final analysis

Photo 2: Calloway Unit 347. Dropped from final analysis

Photo 3: Calloway Unit 349. Dropped from final analysis

Photo 4: Proposed PCL treatment area along Bear Pass Road.

Photo 5: Blue Timber Sale along Bear Pass Rd. Completed in 2017.

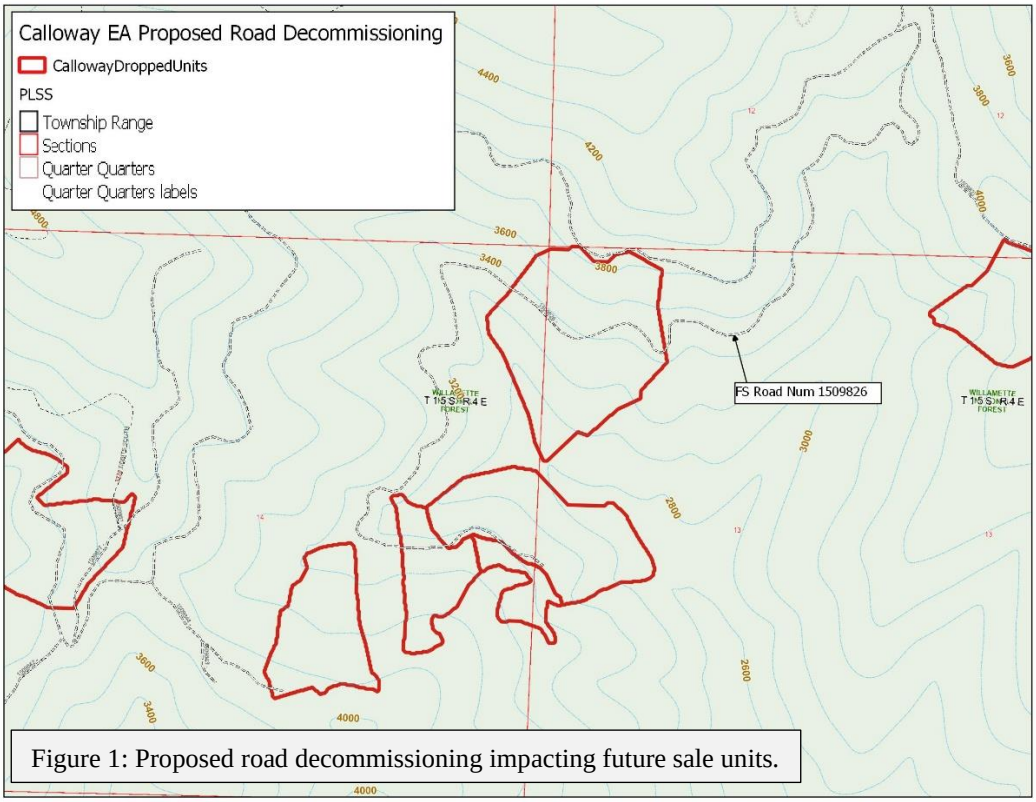


Figure 1: Proposed road decommissioning impacting future sale units.

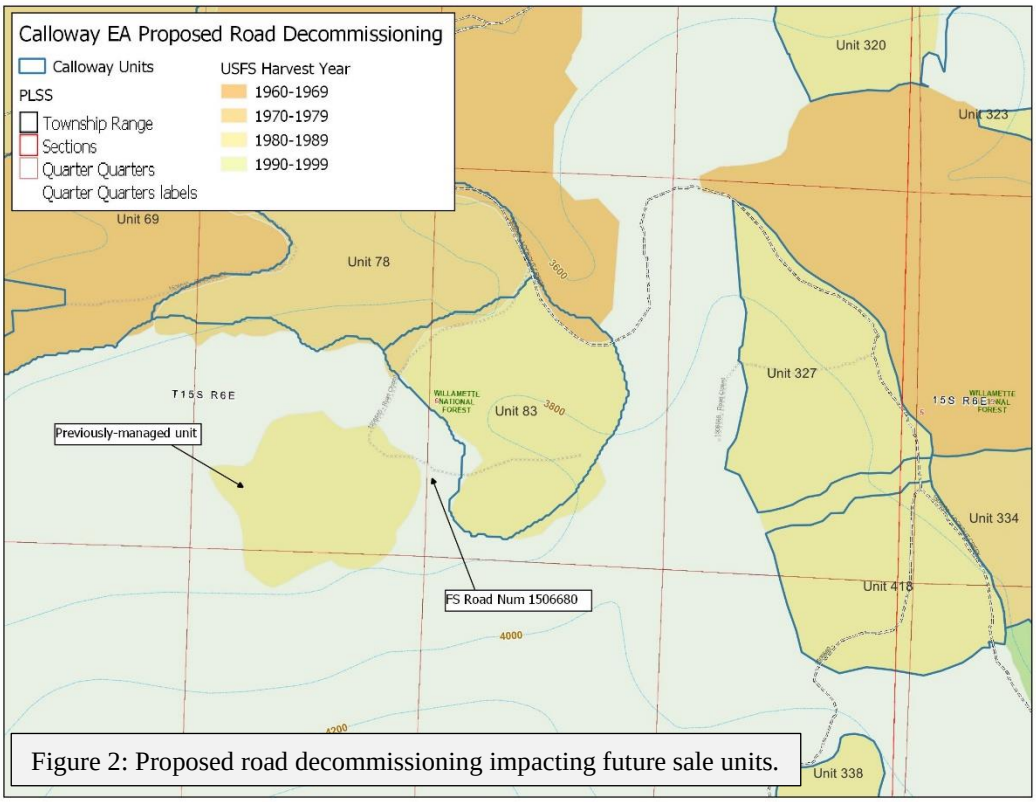


Figure 2: Proposed road decommissioning impacting future sale units.