



**BlueRibbon Coalition**  
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**Ben Burr, Executive Director**  
BlueRibbon Coalition  
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September 4, 2025

Robert Sanchez, Forest Supervisor  
McKenzie River Ranger District  
57600 McKenzie Highway  
McKenzie Bridge, OR 97413  
dean.schlichting@usda.gov

**RE: Objection of BlueRibbon Coalition to the Calloway Project**

**Willamette National Forest – McKenzie River Ranger District**

**Project ID: 63148**

Dear Objection Reviewing Officer, Robert Sanchez, Willamette National Forest Supervisor:

Please accept these objections to the Final EA (EA), Draft Decision Notice (DN), and Finding of No Significant Impact (FONSI) for the Calloway Project. The Responsible Official is Darren Cross, District Ranger. These objections are submitted on behalf of BlueRibbon Coalition (BRC), including BRC's individual and organizational members who have enjoyed, and plan in the future to enjoy, access to the Carbon River Landscape Analysis Project Area.

These objections are submitted in accordance with 36 C.F.R. part 218. BRC filed scoping comments on the Calloway Project raising the stated issues or otherwise providing a basis for these objections. The point of contact for this objection is Simone Griffin, please direct all communication regarding these objections to Simone Griffin at 800 W Main St Suite 1460, Boise, ID 83702. We formally request a resolution meeting in accordance with 36 C.F.R. § 218.11.

## **I. Interest of the Objector**

BRC has a unique perspective and longstanding interest in motorized vehicle use in the Project Area. BRC is a nonprofit corporation that champions responsible recreation and encourages individual environmental stewardship. BRC members use various motorized and nonmotorized means to access public lands and waters, specifically including use of the MBSNF. BRC has a long-standing interest in the protection of the values and natural resources addressed in this process, and regularly works with land managers to provide recreation opportunities, preserve resources, and promote cooperation between public land visitors.

## **II. Objection Issues**

We note at the outset that the agency has conducted a lengthy process, and addressed many of our concerns. We want to express our appreciation for the agency's thoughtful effort, support of stakeholder involvement and collaboration, and patience in this lengthy process. Still, there remain concerns with the current approach, and we raise the following objections, which provide a legal basis for our requested changes to the Draft ROD.

The objection process necessarily anticipates the possibility and potential likelihood of success in subsequent litigation brought by an objector. In such a challenge the Administrative Procedure Act (APA) waives the United States' sovereign immunity for those aggrieved by "final agency action." 5 U.S.C. §§ 702, 704; *Lujan v. National Wildlife Federation*, 497 U.S. 871, 882 (1990). APA section 706(2) provides the relevant standard of review: a reviewing court shall "hold unlawful and set aside agency action, findings, and conclusions found to be—(A) arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law; [or] (C) short of statutory right; [or] (E) unsupported by substantial evidence...." This standard of review is "narrow" but the agency:

must examine the relevant data and articulate a satisfactory explanation for its action including a rational connection between the facts found and the choice made....Normally, an agency rule would be arbitrary and capricious if the agency has relied on factors which Congress has not intended it to consider, entirely failed to consider an important aspect of the problem, offered an explanation for its decision that runs counter to the evidence before the agency, or is so implausible that it could not be ascribed to a difference in view or the product of agency expertise.

*Motor Vehicle Mfrs. Ass'n. v. State Farm Mutual Automobile Ins. Co.*, 463 U.S. 29, 43 (1983) (citations omitted). This is considered a deferential standard of review. Still, there always exists some level of litigation risk, and we believe the decision can be improved.

### **Objection Points**

#### **1. Road decommissioning conflicts with current federal policy and administration direction**

The proposed action's plan to decommission, close, or store up to 44.6 miles of existing roads is inconsistent with recent federal policy and executive objectives that emphasize maintaining access, reducing deferred maintenance, and expanding recreation infrastructure. The EXPLORE Act, passed in 2025, promotes expanded access opportunities on public lands, modernizing recreation infrastructure, and streamlining permitting to facilitate recreation and outdoor use.

Moreover, the President's Executive Order "Establishing the President's Make America Beautiful Again Commission" (signed July 3, 2025) directs agencies, including USDA, to address the deferred maintenance backlog, improve infrastructure, expand recreation access, and review policies to enhance domestic use of public lands.

The timing of this executive direction strongly supports maintaining and investing in existing roads rather than removing them. Decommissioning roads would reduce access for recreation, emergency operations, forest

management, law enforcement, grazing, and other legitimate multiple uses.

2. **Proposed road decommissioning is inconsistent with the project's stated purpose and need**

The project's purpose includes sustaining and managing the road system in the project area. Road decommissioning undermines that goal by permanently removing infrastructure that supports forest operations, wildfire suppression, recreation, and public access. A consistent approach would emphasize road maintenance, upgrades, drainage improvements, culvert replacement, fuelbreaks adjacent to roads, and selective road improvements rather than elimination.

3. **Need to consider treatments within Inventoried Roadless Areas**

The project as currently described appears to omit treatment alternatives in Inventoried Roadless Areas (IRAs). That exclusion is unwarranted because the Roadless Rule does not categorically prohibit all management, and the administration is actively reconsidering the Roadless Rule itself.

For example, in 2025, USDA Secretary Rollins announced steps to rescind the 2001 Roadless Rule, thereby removing some restrictions on road construction, timber harvest, and management in roadless areas. The rescission effort underscores that treatment in formerly roadless areas is now under active consideration, and project alternatives should reflect that evolving policy context.

Excluding IRAs from treatment prematurely would leave those landscapes more vulnerable to unaddressed fuel accumulation and severe wildfire. A more balanced alternative should evaluate fuel reduction, thinning, and restoration treatments in roadless-designated lands consistent with evolving policy.

4. **Legal and statutory consistency**

The National Forest Management Act (NFMA) requires multiple-use management, and decommissioning roads eliminates infrastructure required to support multiple uses. The "roadless" framework, as it exists or is being revised, does not necessarily preclude access or treatment, especially under new direction to rescind or amend the rule.

Because current executive direction emphasizes public access and infrastructure investment, the proposed road removals would conflict with that direction and may be vulnerable to legal challenge under the Administrative Procedure Act if not properly justified.

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## **Requested Remedies**

To address these objections, BRC requests that the Calloway Project be revised to:

1. Remove all proposals for road decommissioning, long-term abandonment, or closures, and instead prioritize maintenance, repair, and improvements of existing roads to ensure safe and durable access. BRC previously requested all decommissioned routes be fully analyzed. The economic and socioeconomic impact analysis is greatly lacking in the EA.
  2. Include alternatives that allow for treatments (fuels reduction, thinning, vegetation management) within Inventoried Roadless Areas, consistent with evolving national policy direction.
  3. Fully analyze and disclose the adverse impacts of road decommissioning on recreation, access, emergency response, forest management, and multiple-use objectives.
  4. Support the purpose and need by retaining functional roads while applying fuels treatments adjacent to and accessible from the road network.
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## Conclusion

While BRC supports many of the Calloway Project's treatment and fuel-reduction objectives, the inclusion of road decommissioning is inconsistent with current federal policy, executive direction, and the project's stated purpose. The project should be revised to eliminate road removals and incorporate treatment alternatives in roadless areas.

Ben Burr  
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[brmedia@sharetrails.org](mailto:brmedia@sharetrails.org)

Sincerely,

A handwritten signature in black ink, appearing to be 'B Burr', followed by a long horizontal line extending to the right.

Ben Burr  
Executive Director  
BlueRibbon Coalition

A handwritten signature in black ink, appearing to be 'Simone Griffin'.

Simone Griffin  
Policy Director  
BlueRibbon Coalition