CASCADIA WILDLANDS
We like it wild.

September 29, 2025

Robert Sanchez, Willamette Forest Supervisor
USDA Forest Service
3106 Pierce Parkway Suite D
Springfield, OR 97477

Submitted online via https://cara.fs2c.usda.gov/Public/CommentInput?Project=63148

Re: Objection – Calloway Project (63148), Willamette National Forest, McKenzie River Ranger District

Project Description: The Calloway project area encompasses 45,041 acres and is located on the McKenzie River and Sweet Home Districts of the Willamette National Forest north of Blue River, Oregon. Proposed actions include commercial thinning, fuels reduction, meadow restoration, culvert work, and road construction and maintenance. This project proposal involves:

- Harvest in 5,886 acres of previously managed stands ranging from 30 to 76 years old,
- Thinning in 1,888 acres and fall and leave treatment in 181 acres of Riparian Reserves,
- Non-commercial thinning in 2,149 acres for fuels reduction,
- Construction of 21 miles of temporary roads to be decommissioned when the project is completed,
- Road maintenance on 185 miles of existing roads and culvert replacement or upgrades along harvest and hauling routes, and
- 599 acres of meadow restoration.

Portions of the project area burned by the Lookout and Ore fires (about 18% of the project area combined) have been excluded. The agency is also excluding planned road decommissioning and storage from implementation.

Name and Title of Responsible Official:

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

Lead objector:

Grace Brahler
Cascadia Wildlands
P.O. Box 10455

Eugene, OR 97440
541-434-1463
grace@cascwild.org

This objection is also on behalf of:

Doug Heiken
Oregon Wild
P.O. Box 11648
Eugene, OR 97440
(541) 344-0675
dh@oregonwild.org

Specific Issues Related to the Proposed Action:

Cascadia Wildlands and Oregon Wild ("Objectors") respectfully submit these objections, pursuant to 36 C.F.R. § 218, to the Calloway Project final Environmental Assessment (EA) and draft Decision Notice/Finding of No Significant Impact (DN/FONSI), issued August 12, 2025, by the Willamette National Forest.

1. **Interests and participation of objecting parties:**

Founded in 1998, Eugene-based non-profit Cascadia Wildlands represents approximately 15,000 members and supporters with a mission to defend and restore Cascadia's wild ecosystems in the forests, in the courts, and in the streets. Cascadia Wildlands envisions vast old-growth forests, rivers full of wild salmon, wolves howling in the backcountry, a stable climate, and vibrant communities sustained by the unique landscapes of the Cascadia bioregion. Cascadia Wildlands' staff and members have used and will continue to use the area impacted by the proposed actions for activities such as hiking, camping, bird watching, foraging, and other recreational and professional pursuits.

Oregon Wild is a non-profit organization with approximately 20,000 members and supporters throughout the state of Oregon and the Pacific Northwest. Oregon Wild and its members are dedicated to protecting and restoring Oregon's lands, wildlife, and waters as an enduring legacy. Our goal is to protect areas that remain intact while striving to restore areas that have been degraded. This can be accomplished by moving over-represented ecosystem elements (such as logged and roaded areas) toward characteristics that are currently under-represented (such as roadless areas and complex old forest). Oregon Wild members use the forest areas in and near the Calloway project area for hiking, recreation, wildlife watching, nature appreciation, and other recreational pursuits.

Pursuant to 36 C.F.R. § 218.5(a), these groups have submitted timely, project-specific written comments during scoping and additional designated comment periods for the Calloway Project, which we incorporate by reference.

2. **Issues of the decision to which objections apply:**

Objectors acknowledge and appreciate that the Forest Service has developed a project focusing predominantly on thinning young stands. We are generally supportive of this approach, as it avoids much of the ecological harm and controversy associated with logging older stands and/or more intensive regeneration harvest. That said, thinning still includes concerning trade-offs including: carbon emissions that exacerbate global climate change, soil impacts from heavy equipment, lasting impacts from road construction, impacts to imperiled northern spotted owls and their prey species, long-term impacts to future recruitment of snags and dead wood both in upland and riparian areas, increased weeds, potential for increased fire hazard due to modified microclimate and increased growth of surface & ladder fuels, and more. Commercial thinning and road building also have lasting impacts to surrounding older forests that must be considered and mitigated. Our objections, outlined below, pertain to environmental impacts of road construction and use and impacts to imperiled wildlife, their habitat, and prey base.

3. **Objectors identify the following parts of the EA/DN/FONSI for objection.**
    a. **The Forest Service failed to take a hard look at adverse environmental impacts of roads.**

Commentors submitted numerous comments urging the agency to limit treatments to units that utilize the existing road network and to avoid wet weather hauling.

> "We urge the FS to carefully consider the need for road construction. Even so-called temporary roads have long-term effects on soil, water, and vegetation. Road construction will add to the cumulative effects of recent fires on soil, water, and vegetation. The FS should develop an alternative that avoids new road construction and focuses on portions of stands that are accessible from existing roads." Scoping Comments at 2.
>
> "Hauling logs on wet roads is inconsistent with the Aquatic Conservation Strategy, especially where roads cross streams or are located in riparian reserves, or where road drainage may be connected to streams." Scoping Comments at 3.

The Forest Service's road network is already massive and there is a significant backlog of road maintenance costs. We are concerned about the district's ability to maintain existing roads given current resources and capacity. Roads fragment landscapes and modify wildlife behaviors, increase likelihood of erosion and risk of landslides, introduce sediment to waterways, spread invasive weeds, increase risk of fire starts, and introduce trash. Even temporary roads carry these environmental harms.

The agency analyzed decommissioning and storing existing roads in the EA:

> "Results of the forest level Travel Analysis Process (TAP), also known as the Willamette National Forest Road Investment Strategy (RIS; USDA 2015) were analyzed at the project scale using field assessment and district roads analysis. The district IDT went road by road looking at roads labeled "likely not needed for future use" and "analyze for closure" to determine whether the forest level recommendations were appropriate at the project scale. The road by road analysis table (available in the project file) lists all the system roads that were reviewed within the project area, comments from the various IDT resources, and recommendations. The conclusions of the road by road analysis are as follows:
>
> - As recommended by the RIS, approximately 44 miles of road were analyzed for decommissioning; approximately 10 miles would be recommended for decommissioning
> - As recommended by the RIS, approximately 27 miles of road were analyzed for storage; approximately 27 miles would be recommended for storage."

EA at 23–24.

The EA also acknowledges that the recent fires will increase sediment loads in streams within the project area.

> "Wildfire also affects sediment delivery to streams. The 2023 Lookout Fire and 2024 Ore Fire collectively burned approximately 8,294 acres within the analysis area and likely resulted in increased sedimentation to streams due to both the fire itself (e.g. burned vegetation decreasing surface roughness and increasing runoff from bare soils) and the fire suppression efforts (e.g. constructing fire line on steep slopes, widespread heavy equipment traffic on native surface and aggregate roads). Increased risk of sedimentation delivery would continue until vegetation recovers, as discussed in Riparian Reserve Existing Conditions."

EA at 63.

While the agency intends to decommission temporary roads post-implementation, the agency ultimately decided not to decommission and store existing roads. Draft FONSI at 1. This means excluding ten miles of road decommissioning and 27 miles of road storage. EA at 1. The agency has provided no explanation for this decision. Why did the agency decide not to follow the recommendations to decommission and store roads?

To remedy this concern, please include road decommissioning and storage in the final decision as analyzed and recommended. The Forest Service should remove the allowance for wet weather hauling.

b. The Forest Service failed to exclude older forest units from the project, inconsistent with the project's stated purpose and need.

Cascadia Wildlands staff and volunteers conducted field visits to much of the proposed treatments units in summer and fall of 2023 and submitted a detailed list of location information, photos, and observations to the agency. We flagged units that included older, diverse forests, which did not align with the agency's intent to treat young, previously managed stands younger than 80 years. We requested that these areas be removed from the final project. While a few of the units we flagged in our supplemental comments are no longer included in the project, the following remain. Unit numbers and the field observations and photos we submitted to the agency are below.

Unit 41:

The forest in this unit contains a wide range and abundance of native flora and fauna. Common names of plant species found here: Oregon grape, beargrass, rhododendron, twin flower, brambleberry, manzanita, bracken fern, snowberry, prince's pine, wintergreen violet, wild ginger, coltsfoot, sword fern, candy stripe fungus, evergreen huckleberry, aralia, vanilla leaf, trillium, serviceberry, kinnikinnick, ocean spray, deer vetch, galium aparine/cleaver, false solomon's seal, saxifrage, pathfinder, rattlesnake plantain, hazelnut, thimbleberry, and boxwood.

Wildlife noted in this area includes deer, elk, pileated woodpecker and sapsucker forage, and mountain beaver dwellings.

The forest in the stand consists of both old growth and mature trees with predominantly Douglas firs, and western hemlocks. There are also pacific yews, incense cedar, red alder, and dogwood trees. Typical overstory trees range from 30-36 inch DBH with some old growth trees including at least one Douglas fir that is 58.5 inch DBH. A tree core sample of a 36 inch DBH Douglas fir was estimated to be around 250 years old. This stand contains distinct layers and biodiversity and would not benefit from any type of logging.

Recommendation: Thinning, if any, should only be along the road. The USFS should take into account the impacts of rebuilding FS road 1516669. This unit should not be included in this project as it contains forests older than 80 years and therefore does not align with the proposed action listed under purpose and need of project within project's scoping letter (signed December 9th, 2022) to "Treat up to 8,213 acres of timber less than 80 years old in previously managed stands."

Unit photos https://drive.google.com/drive/folders/1pBR7zWJCk-nrIwYMx_UN7RHuvBxNXoDn?usp=sharing

^Unit 41, photo by Cascadia Wildlands.

Unit 47:

This unit surrounds the end of decommissioned/overgrown FS Road 1516669, which leads onto a ridge that surrounds forest that has been previously logged and currently contains younger, more densely growing trees with a maximum DBH of 22 inches, and most trees under 18 inches DBH. Once the old road ends, the unit continues into a steep valley with loose soils and more mature forest with varied understory and native plants.

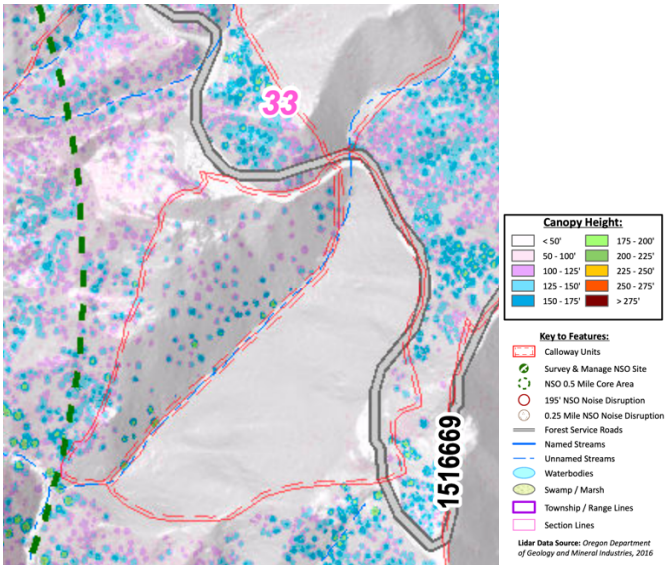
Recommendation: Selective thinning should only occur via helicopter or other methods that minimize the need to rebuild road ways on steep terrain. The portion of the unit further into the valley and closer to Trapper Creek should be removed from the project.

Unit photos
https://drive.google.com/drive/folders/1Fg_kwsPWspp8E84hQQZzSSlqS0A5ahY6?usp=sharing

Unit 51:

There are a number of visibly large and mature trees looking down into the stream valley below. The ridge's slope is very steep; easily 45 degrees and very difficult to traverse. Lidar data shows consistent scattering of multiple tall, large trees.

Recommendation: The USFS should remove this unit from the project as it does not align with the proposed action listed under purpose and need of project within project's scoping letter (signed December 9th, 2022) to "Treat up to 8,213 acres of timber less than 80 years old in previously managed stands."



Unit 218:

This stand is along a very steep slope and contains large old growth trees including a 35 inch DBH hemlock, 37 inch DBH western red cedar, and 55 inch DBH Douglas fir. There are multiple large trees and snags with ample wildlife evidence and appears to be excellent habitat for the northern spotted owl.

Recommendation: The USFS should remove this unit from the project as it does not align with the proposed action listed under purpose and need of project within project's scoping letter (signed December 9th, 2022) to "Treat up to 8,213 acres of timber less than 80 years old in previously managed stands."

Unit 279 (along FS Road 618):

Mixed aged stand including mature and old growth forest, including at least 3 live old growth Douglas fir trees at 40, 50 and 60 inch DBH and multiple snags over 40 inch DBH.

Recommendation: The USFS should remove this unit from the project as it does not align with the proposed action listed under purpose and need of project within project's scoping letter (signed December 9th, 2022) to "Treat up to 8,213 acres of timber less than 80 years old in previously managed stands."

Unit photos https://drive.google.com/drive/folders/1HK-bm9YXp_4g1G6CgacsiMHZShionVbl?usp=sharing

^Unit 279, photo by Cascadia Wildlands.

The EA lists these forest stands as younger than 80 years old, but field observations showed older forest characteristics. They contain older legacy trees and habitat features that will be negatively impacted by logging. We ask that conditions be field verified and that these units be removed from the project.

Recovery action 32 habitat in the project area, which would be degraded by proposed fuels treatments, has not yet been field verified by the agency prior to the final decision:

> Treatment areas would be field reviewed for presence of RA32 habitat by the wildlife biologist prior to implementation. Any RA32 habitat along the Goldhill-Quentin trail and Tidbits ridgeline that is not within 150 feet of a road would be skipped to reduce the effects and meet the design criteria in the Biological Assessment. Treatments in older forest stands over 80 years old that may contain suitable but not RA32 owl habitat would cut and remove conifers up to 9 inches in diameter from the understory, leaving the overstory intact. While the treatments of cutting, piling and removing conifers up to 9 inches in diameter and below the forest canopy would not modify the spotted owl habitat type, understory stand diversity would be reduced which could have negative effects to spotted owl prey habitat. Nest patches would be excluded from treatment.

EA at 41.

We are concerned about the inclusion of these stands because forest stands that are older in age or that are exhibiting characteristics of older forests are more effective at storing carbon, retain higher moisture levels, provide wildlife habitat and cooler climate refugia, offer recreation opportunities, filter drinking water, and are more resilient to wildfire. These areas should be removed from the project, as treating them is inconsistent with the stated purpose and need to treat timber less than 80 years old in previously managed stands. Very little mature and old-growth forests remain on public lands, and the risks of logging or building roads in or adjacent to areas with old forest characteristics far outweigh purported benefits.

To remedy this issue, the agency should verify RA32 habitat conditions in the project area and exclude the units exhibiting older forest characteristics from treatment.

c. The project will negatively impact northern spotted owls.

We are concerned about the project's impacts to imperiled species and their habitat, including northern spotted owls. There are twenty-four historic northern spotted owl activity centers inside the project area. EA at 45. Variable density thinning is proposed in 2,213 acres of suitable habitat, including 808 acres of critical habitat. EA at 40, 44. Fuels treatments are proposed in 852 acres of suitable and 500 acres of dispersal habitat, including 981 acres of critical habitat. EA at 41, 44. Rock quarry expansion would permanently remove approximately three acres of dispersal habitat. EA at 42. The agency relies on project design criteria to mitigate impacts.

Commentors submitted extensive comments outlining concerns about and studies showing the impacts of thinning on spotted owl prey. For example:

> "Given the importance of flying squirrels to the diet of the spotted owl, managers must ensure that thinning does not significantly reduce the flying squirrel population, but recent evidence shows that thinning does in fact lead to a multi-decade decline in the number of flying squirrels. The agencies must leave significant untreated skips in order to mitigate for this significant adverse effect." Comment on Draft EA at 16.
>
> "The finding that thinning reduces, for a couple decades at least, populations of flying squirrels, an important prey for spotted owls throughout their range, reinforces the importance of finding the optimal mix of thinned and unthinned areas within stands and across the landscape (not just for flying squirrels but also for dead wood recruitment and other ecological values). The agencies' current approach does provide a mix, but NEPA analyses fail to seek or find the optimum mix." *Id.*

And, the agency failed to take a hard look at impacts of thinning to prey or consider pressure from the barred owl despite commentors raising this issue:

> "Evidence that barred owls impose adverse effects on both flying squirrels and spotted owls should be considered in the analysis of cumulative effects." *Id.* at 23.

While we support the agency's decision to exclude fire-impacted portions of the project area, we are concerned by the anticipated adverse effects to spotted owl habitat and prey because of this project, especially in light of recent wildfires that impacted habitat in the project area.

> "The Calloway Project Area has also been modified by large wildfires in the past five years which include the 2020 Holiday Farm (325 acres), 2021 Knoll Fire (178 acres), 2023 Lookout Fire (4,809 acres), and 2024 Ore Fire (3,479 acres). In total, about 8,791 acres, or about 20%, of the Calloway Project Area burned at variable levels of fire severity. The main effect of these fires on spotted owls is a reduction in the quantity of suitable and dispersal habitat where fire caused high levels of tree mortality, and stand development of unsuitable habitat was also set back. Some areas only had low fire severity and tree mortality was patchy, creating small gaps on the landscape which could potentially improve habitat for spotted owl prey species."

EA at 42.

Further, recent literature outline that there is a high likelihood of under-identifying occupied sites and pairs associated with using protocol surveys and current practices in coding that data. *See* Appel, Cara L., Damon B. Lesmeister, Adam Duarte, Raymond J. Davis, Matthew J. Weldy, and Taal Levi. 2023. "Using Passive Acoustic Monitoring to Estimate Northern Spotted Owl Landscape Use and Pair Occupancy." *Ecosphere* 14(2): e4421. https://doi.org/10.1002/ecs2.4421. The agency should follow recommendations in this study to ensure owls are adequately detected.

Given the continuous decline of the northern spotted owl due largely to habitat loss from logging, road building, and wildfires in recent years, proceeding with project actions that will further degrade or remove habitat and likely to adversely affect the species needs in depth, site-specific analysis. We remain concerned about project actions resulting in take of spotted owls due to loss of nesting structures from the removal of snags, reductions in prey populations, and disturbance from noise.

To remedy these concerns, the agency should prepare an environmental impact statement to analyze potential impacts to northern spotted owls, their habitat, and their prey base.

4. **Issue based on new information that arose after opportunities for comment:**

The McKenzie River District released a draft environmental assessment for the South Fork Delta Restoration Expansion Project in June 2025. The South Fork Delta EA indicated the agency intends to implement 252 acres of logging in units that were originally targeted for

logging in the Flat Country Project to source wood for floodplain rehabilitation. Flat Country received significant backlash from the public, elected officials, and scientists in response to the agency's proposal to log stands that were older, complex, and fully capable of developing high quality habitat without intervention. That project was cancelled in 2022. Now, as part of the South Fork Delta Restoration Expansion Project, the district is proposing to source wood for restoration purposes by logging in Flat Country stands, including taking 2500 trees up to 32" DBH and banking untreated wood for unspecified future restoration projects. These source wood stands, which range from 107 to 159 years old, are located 20 miles from the intended restoration sites.

As expressed to the district in comments on the draft EA, which we incorporate by reference, we find the South Fork Delta Restoration Project to be highly objectionable, NOT because of its purpose or intent, but because the Forest Service is using the project to sneak in a large portion of the Flat Country timber sale which was CANCELLED because it was controversial. In our comments on the South Fork Delta EA, we suggested alternative options for wood sourcing:

> "It would be best to consider wood sourcing alternatives such as: large wood salvaged from Cougar Reservoir or Blue River Reservoir, or roadside hazard trees (which are abundant after recent fires), or trees from young stand thinning projects."

Comments on South Fork Delta EA at 2. We did not have the opportunity to raise this suggestion in comments on the Calloway Project, as the comment period for this project ended prior to the release of the South Fork Delta Restoration Project EA.

Utilizing logs from the Calloway Project would align with this suggestion and advance the purpose and need of the South Fork Delta Restoration Expansion Project with far less conflict and controversy than sourcing from mature Flat Country units. Please consider sourcing wood from the Calloway Project for floodplain rehabilitation actions proposed in the South Fork Delta Restoration Expansion Project instead of Flat Country units.

Thank you for considering this objection. We look forward to the objection resolution process.

Grace Brahler
Cascadia Wildlands
P.O. Box 10455,
Eugene, OR 97440
541-434-1463