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October 30, 2025

Robert Sanchez, Willamette Forest Supervisor
Willamette National Forest Headquarters
3106 Pierce Parkway Suite D
Springfield, OR 97477

Submitted online via: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=66445>

Subject: 36 C.F.R. § 218 objection of the South Fork Delta Restoration Expansion Project

Dear Supervisor Sanchez:

In accordance with 36 C.F.R. § 218, Oregon Wild and Cascadia Wildlands (Objectors) hereby submit these objections (Objection) to the South Fork Delta Restoration Expansion Project as described below.

DOCUMENT TITLE: South Fork Delta Restoration Finding of No Significant Impact (DN/FONSI), issued September 11, 2025, and South Fork Delta Restoration Expansion Environmental Assessment (EA).

PROJECT DESCRIPTION: This project proposes to restore 118 acres of floodplain adjacent to 672 acres of ongoing restoration in the lower South Fork McKenzie River analyzed in the SF EA. In part, this project proposes to place approximately 2,500 pieces of large wood, ranging from 8 to 32 inches diameter at breast height (DBH), in constructed log jams throughout the floodplain and within multiple stream channels. The upland wood source stands cover approximately 692 acres in total, or approximately 318 acres of potential wood source treatment areas after accounting for skips within stands. Wood source units are located approximately 20 miles east of the floodplain restoration areas. The upland wood source logging units are located in the Flat Country Project boundary, and include many of the same units previously proposed for logging in the Flat Country Project.

PROJECT LOCATION (Forest/District): Willamette National Forest, McKenzie River Ranger District, Lane County, Oregon.

NAME AND TITLE OF RESPONSIBLE OFFICIAL:

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LEAD OBJECTOR:

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REQUEST FOR MEETING TO DISCUSS RESOLUTION: Objectors hereby request a meeting to discuss potential resolution of the issues raised in this objection.

OBJECTION

1. Interests and participation of Objectors.

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. Oregon Wild's 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 South Fork Delta Restoration Expansion project area for hiking, recreation, wildlife watching, nature appreciation, and other recreational pursuits.

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.

Pursuant to 36 C.F.R. § 218.5(a), Objectors submitted timely, project-specific written comments during the comment period for the South Fork Delta Restoration Expansion Project. Such comments, dated July 7, 2025, are incorporated into this Objection by reference (Comments).

2. Issues of the decision to which the Objection applies.

Objectors are generally supportive of the Forest Service's proposal to restore the floodplain in the project area. Restoration of the floodplain will result in a myriad of benefits to the environment including creating a hydrologically connected, well-functioning ecosystem; increasing habitat availability, variety, and quality for species listed as threatened or endangered under the Endangered Species Act; and creating a resilient floodplain that maintains biodiversity in the face of future threats to the climate and environment. However, Objectors strongly oppose the use of trees from the Flat Country project area. The Flat Country timber sale was cancelled due to its controversial nature stemming from its location in stands that are older, complex, and fully capable of developing high quality habitat without human intervention. Utilizing the Flat Country project area as the wood source units is not justified for the South Fork Delta restoration because the negative trade-offs outweigh the positive effects and because the project area holds serious significance for members of both Oregon Wild and Cascadia Wildlands. Overall, Objectors' objections to this project all stem from the decision to source wood from the proposed upland wood source units that were previously part of the Flat Country project.

3. Objectors identify to the following parts of the DN/FONSI/EA for objection.

Objectors believe that the Forest Service's decision, and the analysis in the EA, violate both the National Environmental Policy Act (NEPA) and the National Forest Management Act (NFMA) for several reasons, including but not limited to:

- a. Failure to consider an adequate range of alternatives under NEPA;
- b. Failure to take a "hard look" at direct, indirect, and cumulative impacts of the project.
- c. Failure of the proposed alternative to fulfill the purpose and need of the EA.

Objectors also believe that as a matter of policy, the Forest Service should not conduct any treatment in the Flat Country project area due to the area's significance and importance as a mature and old-growth forest.

a. Failure to consider an adequate range of alternatives under NEPA;

Objectors find that the Forest Service failed to consider an adequate range of alternatives as required by NEPA. The EA for the project was prepared according to the Forest Service NEPA regulations found at 36 CFR part 218, the USDA NEPA regulations found at 7 CFR part 1b, and the now rescinded CEQ NEPA regulations. EA at 28. Under 7 CFR § 1b.5(c)(2)(ii), “[a]lternatives may be included to the extent required by NEPA section 102(2)(H), 42 U.S.C. 4332(2)(H).” In turn, 42 U.S.C. § 4332(2)(H) requires agencies to “study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources.” *See also*, 40 CFR § 1501.5(c)(2) (An environmental assessment shall briefly discuss the (ii) alternatives as required by section 102(2)(H) of NEPA; and (iii) environmental effects of the proposed action and alternatives.

Objectors find that the Forest Service did not develop an adequate range of alternatives for the sourcing of wood for the project. Objectors previously urged the Forest Service to consider alternative wood source units for the project. Objectors stated in their Comments:

We strongly object to the Forest Service refusing to consider alternative sources of large wood that would be less controversial and have fewer trade-offs. This is a clear NEPA violation. NEPA requires the Forest Service to consider alternatives that mitigate adverse effects. We urge the agency to minimize the trade-offs and impacts associated with sourcing large wood.

Comments at 2. Objectors maintain that the upland wood source units are highly controversial, and thus pose an unresolved conflict concerning alternative uses of available resources. Controversy exists because the proposed wood source units compose some of the same units proposed for logging in the Flat Country project that was previously cancelled. While the Forest Service responded to Objectors’ concerns regarding overlap with the Flat Country project, the Forest Service failed to grasp the issue underlying the controversy: logging in stands that are older, complex, and fully capable of developing high quality habitat without human intervention. In the EA, the Forest Service states that comments regarding Flat Country are outside the scope of this project and its proposed action because the treatments planned for the South Fork Delta Restoration Expansion project are not the same or for the same purpose. EA at 84. Even so, the proposed action in this project will still involve treatment in some of the same units and pose environmental consequences. As such, controversy still exists.

The proposed units are a significant place for members of both Oregon Wild and Cascadia Wildlands. Oregon Wild staff and members hike, bike, photograph scenery and wildlife, use, and engage in other vocational, scientific and recreational activities in and around the Flat Country project area. They derive recreational, inspiration, and aesthetic benefit from their activities in the project area. Oregon Wild staff and members intend to continue to use and enjoy the Flat Country project area that is proposed for treatment in this project. Likewise, Cascadia Wildlands’ staff and members hike, camp, forage, find solace, enjoy artistic pursuits, and other interests in and near the mature and old-growth forests that were targeted for logging by the Flat Country project and intend to continue enjoying these older forests for recreational,

professional, and spiritual reasons. Cascadia Wildlands' volunteers, called the WildCATs, field checked virtually every unit of the massive Flat Country timber sale, finding large swaths of mature forests with massive legacy trees and diverse, healthy wildlife habitat throughout the project area. Cascadia Wildlands previously communicated these findings and serious concerns to the Forest Service. Considering the controversy, Objectors suggested to the Forest Service that:

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. With the massive roadside danger tree removal effort that took place after the Holiday Farm fire we are shocked the FS can't find wood locally.

Comments at 2. In response to Objectors' suggestions, that Forest Service states in the EA that:

Upland wood source units closer in proximity to the lower South Fork McKenzie River restoration project area near Cougar Dam were initially considered. However, after internal scoping and preliminary analysis, it was determined the units would be infeasible due to mixed land ownership, land management areas, level of project surveys needed, and stand age and complexity not warranting treatment.

EA at 12. While the Forest Service did mention that wood source units near Cougar Dam were considered, the EA does not adequately provide analysis of the considerations and reasons such units were considered infeasible. What is the land ownership, land management areas, and level of project surveys needed that make such units infeasible? What is the stand age and complexity that does not warrant treatment? What corresponding details for the proposed upland wood source units make the proposed units feasible? What is the level of analysis that was conducted for other suggested sourcing areas, including Blue River Reservoir, roadside hazard trees from recent fires, or other young stand thinning projects?

Additionally, Objectors question the narrow scope of wood sources seriously considered to fulfill the purpose and need of this project. If the Flat Country project had been implemented, the Forest Service would need to source wood from a different location for the South Fork Delta restoration. The EA also states that wood sourcing from upland units would only be completed as needed to supplement other sources, such as roadside hazard tree treatment. EA at 84. It's clear that alternative wood source locations exist, but the Forest Service chose not to seriously consider them in the EA. Objectors recommend the nearby Calloway Project as a possible wood source location for the South Fork Delta restoration. From Objectors' objection to the Calloway Project, submitted September 29, 2025, and incorporated here in full by reference:

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.

Calloway Project Objection at 10–11.

Suggested resolution: The Forest Service should drop the upland wood source units that were also part of the Flat Country project area and instead source wood from other locations. In the alternative, the Forest Service must at the very least consider an adequate range of alternatives in the EA that analyzes alternative wood source units.

b. Failure to take a “hard look” at direct, indirect, and cumulative impacts of the project.

Objectors find that the Forest Service failed to take a “hard look” at the impacts of the project as it relates to the upland wood source units. NEPA requires the Forest Service to disclose and analyze environmental information and the consequences of federal action. *Ctr. For Biological Diversity v. Salazar*, 695 F.3d 893, 916 (9th Cir. 2012). Under the now rescinded CEQ NEPA regulations that the Forest Service continues to rely on for this project, NEPA requires that the Forest Service discuss the environmental effects of the proposed action and alternatives. 40 C.F.R. § 1501.5(c)(2)(iii). “Effects” are defined to include direct effects which are caused by the action and occur at the same time and place; indirect effects which are caused by the action and are later in time or farther removed in distance, but still reasonably foreseeable; and cumulative effects which are effects that result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions. 40 C.F.R. § 1508.1(i)(1)-(3). The Forest Service did not take the requisite “hard look” at the following direct, indirect, and cumulative effects of the project.

(i) Northern spotted owl

Objectors previously noted that logging in the proposed upland wood source units will occur within two occupied and two unoccupied northern spotted owl activity centers. Comments at 2. Objectors also stated that logging will degrade habitat conditions for spotted owl; that the Forest Service's logging prescriptions must address both canopy cover and structural conditions important to spotted owls and their prey; and that the Forest Service should strive to maintain existing or better conditions, not just maintain an arbitrary minimum condition. Comments at 5.

The Forest Service acknowledges that logging will degrade habitat conditions for spotted owls in the proposed upland wood source units. Of the 318 acres proposed for upland wood sourcing, only 135 acres would maintain suitable habitat after treatment. 110 acres would have nesting/roosting habitat downgraded to foraging. 72 acres would be downgraded to dispersal habitat. One acre would have suitable habitat removed. EA at 21. Removal of suitable owl habitat may affect and is Likely to Adversely Affect (directly and indirectly) spotted owls because treatment would remove and downgrade suitable habitat and therefore decrease the amount of nesting, roosting, and foraging habitat for an owl pair. EA at 21.

Objectors find the current state of the northern spotted owl is a major cause for concern, and that the Forest Service should not be downgrading or degrading suitable spotted owl habitat which will contribute towards further decline of the species. The Forest Service must further analyze the direct, indirect, and cumulative impacts that will result from the proposed treatment in the upland wood source units. Sites occupied by spotted owls tend to have higher densities of trees both large and small compared to sites that are not occupied by spotted owls.¹ Proposed treatment will thin the stands and remove both large and small trees that make suitable northern spotted owl habitat. Additionally, northern spotted owl prey, specifically flying squirrels, require abundant mid-level visual occlusion provided by mid-canopy vegetation layers and abundant tree boles to avoid predation during gliding.² How will proposed treatment affect flying squirrel populations, and thus affect northern spotted owl? Snags and dead wood are also important to northern spotted owl.³ While the EA does have some project design features

¹ Everett, Richard; Schellhaas, D.; Spurbeck, D.; [and others]. 1997. Structure of northern spotted owl nest stands and their historical conditions on the eastern slope of the Pacific Northwest Cascades, USA. *Forest Ecology and Management*. 94: 1-14.

² Wilson, T. 2008. Limiting Factors For Northern Flying Squirrels (*Glaucomys Sabrinus*) In The Pacific Northwest: A Spatio-Temporal Analysis. PhD Dissertation. Union Institute & University, Cincinnati, Ohio. https://www.fsl.orst.edu/rna/Documents/publications/Quinault_Limiting%20factors%20for%20northern%20flying%20squirrels%20etc.pdf

³ Appendix A of the 2010 Draft Recovery Plan for the Northern Spotted Owl (page 92) describes owl habitat as including "large snags; large accumulations of fallen trees and other woody debris on the ground." This is widely supported: "[H]abitat elements that support prey [include] (mistletoe, snags, down wood, forage lichens, truffles abundance)" 2008 NSO FRP p 114. North et al. (1999) noted in a study of foraging habitat selection by northern spotted owls, "In our study area, stands with high use by owls typically included many 'legacies' (large trees and snags) that survived a fire or windstorm that destroyed much of the previous stand. They found that "stands with 142 m³/ha of intact snags and a high diversity of tree heights had medium or high foraging use by spotted owls. In these old-growth stands, biological legacies (e.g., large trees and snags) produced by past disturbance provide important forest structures

intended to protect snags and provide down wood, the EA also admits that the proposed treatment would reduce the number of snags created through suppression mortality. EA at 20. How does reduced future snag and dead wood recruitment affect the northern spotted owl? The Forest Service should provide a more detailed analysis of the effects that may occur to northern spotted owl. The Forest Service should also analyze the impact caused by barred owl competition and the cumulative impact of downgrading and removing habitat in the upland wood source units in light of additional projects conducted by both the Forest Service and Bureau of Land Management that also downgrade and/or remove habitat for the species in the region.

(ii) Mature and old-growth forests

Objectors noted concerns in comments regarding logging of mature and old-growth forests for this project. See Comments at 3, 4, and 6. Specifically, Objectors commented that the Forest Service's analysis on the benefits of thinning in these stands

fails to recognize that these mature and old-growth stands have all the building blocks (and natural processes) for the development of high-quality habitat through the action of natural processes like photosynthesis, succession, disturbance, competition, wind, snow, fire, insects, etc. which cause all of the benefits of thinning without the negative-trade-offs on soil, carbon storage, and snag habitat.

Comments at 4. The Forest Service responded that there is evidence that suggests active management in older stands (>80 years) may be beneficial in fostering continued structural development by promoting the rapid formation of late seral forest structure and maintaining development of understory cohorts. EA at 90. What is the evidence that the Forest Service mentions? The Forest Service's answer, and the analysis in the EA, did not fully consider the impacts of logging in the proposed units. While it is generally accepted that the benefits outweigh the adverse impacts of thinning in young stands, the same is not true for older stands. Thinning in older stands tends to have greater impacts on soil, water, weeds, carbon and dead wood recruitment, so the impacts often outweigh the benefits. Conversely, retention of larger trees and intact mature and old growth forests provides numerous benefits including: providing habitat for wildlife that depend on relatively dense forests and/or abundant snags and dead wood; storage of carbon that helps moderate global climate change; enhancement of recreational and scenic values; suppression of growth of weed and hazardous ladder fuels, and reduction of future maintenance costs associated with removal of non-commercial in-growth; and providing cool/moist microclimate buffering that benefits wildlife, recreation, and moderates fire hazard.

The Forest Service should provide a more detailed analysis of the impacts that will occur from the proposed action by evaluating trade-offs among competing uses of the upland wood sources.

associated with spotted owl foraging." North, Franklin, Carey, Forsman, Hamer. 1999. Forest Stand Structure of the Northern Spotted Owl's Foraging Habitat. For. Sci. 45(4):520-527.
[<https://andrewsforest.oregonstate.edu/sites/default/files/lter/pubs/pdf/pub3549.pdf>]

The Forest Service should also evaluate the cumulative impacts of this project when considered with recent wildfires and other past, present, and future projects undertaken by the Forest Service, Bureau of Land Management, and other actors that also impact stands of mature and old-growth forest in the McKenzie River watershed.

(iii) Effects on fire and fuel

Objectors raised concerns over the EA's characterization that thinning would reduce risk of fire spreading through the understory by increasing the growth of moist understory vegetation and that treatments would reduce the risk of fire spreading through the canopy by increasing spacing between crowns. Objectors commented that

Stimulating the understory actually increases surface and ladder fuels which are NOT "moist" during hot, dry weather. And managing canopy fuels is a *fools errand*, because canopy fire is rare, and when it does occur, it is driven by wind, not fuels. Maintaining a dense canopy with a suppressed understory is actually a low hazard condition.

Comments at 5. The Forest Service agreed that wind driven fires are challenging to manage for, and the Forest Service explained that having treated stands helps support firefighters by allowing more opportunities to engage. EA at 90. While that may be true, ability of firefighters to engage does not constitute a hard look at the effects of treatment on fuels and wildfire risk in the proposed upland wood source units.

Logging can make fire hazard worse for many reasons. Logging removes fire resistant trees with thick bark and high canopies that help maintain a cool, moist microclimate and suppress growth of surface and ladder fuels. Logging opens the stand and makes the forest hotter, drier, and windier which exacerbates fire behavior. Logging also moves significant amounts of fine canopy fuels from the canopy to the ground where they are more available for combustion as surface fuel. Opening up of the canopy through logging allows light, water, and nutrients to stimulate growth of future surface and ladder fuels. The Forest Service should provide a more detailed analysis of the effects of the proposed treatment in the upland wood source units on fuel loading and fire risk. The Forest Service should also consider the cumulative impacts on fuel loading and fire risk that this project would have in conjunction with other past, present, or future treatments that will occur in nearby stands.

Suggested resolution: The Forest Service should drop the upland wood source units that were also part of the Flat County project area and instead source wood from other locations. In the alternative, the Forest Service should undertake a "hard look" at the environmental impacts of the proposed action by providing a more meaningful discussion of the effects on the resources noted above. As a note, when the Forest Service considered logging these same stands in the Flat Country project, the Forest Service prepared an EIS recognizing that impacts may be significant. Targeting some of those same stands in this project may also be significant, thus requiring a more thorough analysis than presented in the EA.

c. Failure of the proposed alternative to fulfill the purpose and need of the EA.

Objectors find that the Forest Service's proposed action concerning the upland wood source units under the EA does not fulfill the purpose and need of the project. Under 42 U.S.C. § 4332(2)(C)(iii), federal agencies are required to include in every recommendation or report on major federal actions significantly affecting the quality of the human environment, a detailed statement on a reasonable range of alternatives that meet the purpose and need of the proposal. In essence, the purpose of the project is to restore a hydrologically connected and well-functioning floodplain ecosystem and to increase habitat availability and quality for Endangered Species Act species and other native aquatic and riparian species. EA at 3. The project is needed because existing conditions are severely degraded due to a multitude of factors, and the project area presents a unique potential to restore high value floodplain. *Id.* Overall, the purpose and need of the project focuses on restoring the floodplain in the project area. To accomplish this goal, wood is needed for in-stream placement.

However, the proposed action concerning wood source units does not clearly fulfill the purpose and need because the proposed action is not clearly defined nor sufficiently constrained. Objectors previously raised concerns about the extent of logging proposed in the upland wood source units:

We are also concerned that the FS is approving more logging than necessary, in effect attempting to "bank" untreated wood source areas for future restoration projects that have not even been identified yet. This is not part of the purpose and need. The Forest Service has not even identified those projects.

Comments at 4. The EA proposes to source wood from up to 318 acres across 12 upland wood source units as depicted in Figure 4 of the EA. EA at 9. This sourcing would be used in the floodplain restoration which is part of the purpose and need of the project. However, the EA also states that "[a]ny untreated acres and wood from upland wood source units analyzed in the proposed action may be used to provide large woody material for future instream and floodplain restoration action in the Upper McKenzie valley." EA at 10. Any future project that proposes treatment in this project's proposed upland wood source units should analyze the environmental impacts of the proposed treatment in order to comply with the requirements of NEPA. The Forest Service cannot decide in this project to fulfill an unspecified purpose and need of an unspecified future project. In response to Objectors' concern, the Forest Service states that:

Wood source units are proposed with specific projects in mind, such as the Lower South Fork McKenzie River Floodplain Enhancement Project (2018) that is still ongoing and requires wood for future phases 3 and 4. Upland wood source units would only be used where and when needed for floodplain restoration in combination with other available wood sources as they arise, such as post-fire roadside hazard tree removal.

EA at 89. Even if the upland wood source units would only be used for future floodplain restoration, Objectors maintain that the proposed upland wood source units for *this project*

cannot also be used for future projects that remain at least partially undefined, including in scope of wood needed. Such future need does not go to the purpose and need of this project, and any future project would require an environmental analysis of the proposed action, including sourcing wood from these same proposed wood source units. Additionally, the Forest Service cannot belatedly provide that wood sourcing from the upland units in *this project* is required to fulfill the purpose and need of the Lower South Fork McKenzie River Floodplain Enhancement Project from 2018. The 2018 project analyzed wood sourcing from a different location to fulfill its purpose and need, and arguing that wood from the proposed units for the current project is needed to fulfill the 2018 project is inappropriate and not part of the purpose and need of the current project.

To add more uncertainty into the proposed action's fulfillment of the purpose and need, the EA is unclear as to how the proposed upland wood source units will actually be utilized. On the one hand, the EA specifies that wood will be sourced from up to 318 acres as shown in Figure 4. The upland wood sources were identified for wood sourcing as they were not included in any current planning projects and could provide a range of wood sizes needed in the floodplain restoration. EA at 85. However, the EA also states that wood sourcing from upland units would only be completed as needed to supplement other sources, such as roadside hazard tree treatment. EA at 84. The EA therefore appears to indicate that other wood source units are available for the project, despite also stating that the upland wood source units were the only units identified as feasible for this project.

Suggested resolution: The Forest Service should drop the upland wood source units that constitute the Flat Country project area and instead source wood from other locations. In the alternative, the Forest Service should at the very least more definitively define the extent of wood that is proposed to be obtained from the upland wood source units, and how the Forest Service will fund and/or contract for wood sourcing since no commercial treatment is proposed. The Forest Service should only cut the amount of wood needed for this project, and should not also utilize the upland wood source units for future projects that remain undefined in scope and time.

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



Pablo San Emeterio
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Oregon Wild