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

Via: https://cara.fs2c.usda.gov/Public/CommentInput?Project=68829

Subject: Tie Project Scoping Comments

Dear District Ranger Cross,

Please accept the following comments from Oregon Wild concerning the Tie Project (Project) being planned in the McKenzie River Ranger District on the Willamette National Forest and as described in the letter dated November 21, 2025 (Scoping Letter). Oregon Wild represents 20,000 members and supporters who share the organization's mission to protect and restore Oregon's wildlands, wildlife, and water 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 appreciates the opportunity to provide scoping comments at this stage in the Project development process.

The purpose of this Project is multifold and includes (1) providing a sustainable timber supply to support local economies; (2) reducing wildfire risk through strategic thinning and shaded fuel breaks; (3) improving forest health and resilience by enhancing forest structure, species diversity, and stand density; and (4) maintaining and improving road systems for management, recreation, and wildfire response. The Project area encompasses 36,982 acres and the proposed action would treat up to 7,898 acres through variable density thinning (6,108 acres) and roadside shaded fuel breaks (1,790 acres). 772 acres of roadside fuel breaks will overlap with thinning units.

Please consider the following in planning the Project and conducting the NEPA analysis:

1. Good Neighbor Authority.

Oregon Wild understands that the Forest Service will be entering into an agreement with the Oregon Department of Forestry (ODF) to carry out the Project pursuant to the Good Neighbor Authority (GNA). In turn, ODF will contract with Sundance to perform the NEPA analysis,

conduct surveys, and write consultation documents for the Project. NEPA allows the public to be involved in the federal decision-making process as it relates to federal forest management, and the law is an invaluable tool for both the public and the Forest Service to consider information that is relevant when planning projects on public lands.

Oregon Wild urges the Forest Service to ensure that public involvement and transparency is maintained for the Project, considering that the NEPA analysis is two steps removed from the Forest Service. Such involvement and transparency includes providing updates on the progress of the NEPA analysis, providing the opportunity for public comment and ensuring that comments received by the Forest Service are conveyed to and considered by both ODF and Sundance, and facilitating the exchange of information between ODF/Sundance, the Forest Service and the public. Please disclose the level of oversight that the Forest Service will have over the NEPA process for this Project, and how much direction will be provided by both the Forest Service and ODF to Sundance

Oregon Wild urges involvement and transparency during the implementation phase of the Project as well. Doing so will help the public better understand how GNA projects are carried out and evaluate their efficacy in helping with federal land management, especially as more projects of larger scales are being planned and implemented under the GNA.

Please note that in these comments, Oregon Wild intends that recommendations of what the Forest Service should do or evaluate in this Project and the environmental analysis are applicable to ODF and Sundance as well as those entities perform and otherwise carry out the environmental analysis and implementation for the Project.

2. Variable Density Thinning.

The Project proposes 6,108 acres of variable density thinning within the project area. Oregon Wild understands that the majority of the proposed units are young plantations under 80 years old, but there may also be some stands proposed for treatment that are older than 80 years old. In general, Oregon Wild supports carefully planned and implemented thinning in young plantations, but Oregon Wild does not generally support any treatment in mature and old-growth stands. The Scoping Letter states that the skips and gaps method will be implemented. Please disclose how many acres of skips and how many acres of gaps will be included in the treatment prescription, and the sizes of individual skips and gaps. Additionally, please disclose the extent of thinning that will be prescribed for those portions of units not included in skips and gaps, including the remaining canopy cover percentage, remaining basal area, and other usual parameters tracked in silvicultural prescriptions.

a. Young plantation thinning.

The Forest Service should provide details regarding the stand ages of each unit proposed for treatment. As previously stated, Oregon Wild generally supports thinning in young plantations under 80 years' old that are accessible from existing roads. While all logging, including thinning in young stands, includes some adverse impacts and trade-offs, it is generally accepted that the

benefits of thinning in very young stands outweighs the adverse impacts of logging by creating some beneficial effects. The Northwest Forest Plan recognizes 80 years old as a useful place to draw the line between forests that are likely to benefit from silvicultural treatments and forests that are likely to experience net negative consequences. Negative consequences from logging include but are not limited to soil compaction and disturbance, habitat disturbance and wildlife displacement, release of carbon emissions into the atmosphere, introduction and spread of weeds, removal and reduced recruitment of snags and large wood, road-related erosion and hydrological modification, movement of flammable small fuels from the canopy to the ground, and creation of hotter and dryer microclimates that are conducive to increased fire risk. Some of these negative effects are fundamentally unavoidable, but they can be partially compensated for by beneficial effects that include reduced competition between trees so that some can grow larger faster, increased resistance to drought stress and insects, and increased species diversity In thinning young stands, the Forest Service should use treatments that will help move plantations towards forests with late-successional characteristics. Oregon Wild recommends that the Forest Service incorporate the following in young stand thinning prescriptions:

- Consider proximity to adjacent mature and old-growth habitat that may provide habitat for northern spotted owls as spotted owls may use younger stands for dispersal, foraging and security from predators.
- Generally retain all of the largest trees found in the units, and retain some of the smaller trees in all age-size classes.
- Retain all legacy trees found in young plantations.
- Retain and protect any under-represented conifers and broadleaf trees found in the units.
- Strive for variable density outcome to create diversity and complexity within and between stands.
- Retain abundant snags and dead wood in a pattern that mimics natural disturbance.
- Retain wildlife trees that include hollows, forked tops, broken tops, and leans.
- Retain sufficient canopy coverage to minimize effects of increased fire risk caused by thinning. Increased sunlight will lead to drier, hotter and windier conditions in the forest and stimulate the growth of surface and ladder fuels.
- Focus treatment on areas that are accessible from existing roads to avoid the negative impacts of road construction.

b. Mature and old-growth stands.

The Forest Service should provide information regarding which units proposed for treatment are over 80 years old, and which stands contain characteristics of mature or old-growth forests. The Northwest Forest Plan explained that 80 years is the age when many forest stands begin to develop late-successional characteristics, such as the formation of heavy limbs and an accumulation of coarse woody debris on the forest floor. Mature forests are also more resistant to fire compared to younger forests, provide wildlife habitat, create cool micro-climates, and help mitigate against the effects of climate change. Accordingly, Oregon Wild does not generally

support commercial treatment in mature and old-growth stands as the negative effects of treatment generally outweigh the benefits.

Using LIDAR data, Oregon Wild identified the following units that contain large, tall trees and are therefore may represent older stands greater than 80 years old within the project area:

- 140
- 590
- 640
- 1130
- 1150
- 1380
- 1800
- 2160
- 2510
- 2560
- 2700
- 2720
- 2860
- 3000
- 3020
- 3270
- 3330
- 3350
- 3410

The Forest Service should evaluate whether these stands, and any others not mentioned here, are older stands for which the adverse effects of logging will likely outweigh the benefits. In addition, some of the stands listed here likely serve as important corridors for wildlife connectivity and form parts of larger swaths of older stands. The Forest Service should evaluate whether some or all of the units listed above should be dropped from the proposed treatment in order to preserve older trees and stands and the ecological benefits that such trees and stands provide. In any event, the Forest Service should avoid cutting any single large tree and should implement a diameter limit to do so. Oregon Wild would appreciate the opportunity to conduct field visits with the Forest Service to evaluate some of the above-listed units to determine which may be candidates for dropping from the proposed action.

3. Wildlife Impacts.

Oregon Wild is concerned about the impact of the Project on northern spotted owl. The Project area contains critical habitat, and some of the units proposed for logging appear to fall completely within critical habitat designations. The Forest Service must analyze how the Project will affect northern spotted owl and align with Revised Recovery Plan for the Northern Spotted Owl. Specifically, the Forest Service should analyze the impacts of the Project as they relate to loss of suitable habitat for northern spotted owl, effects of competition with barred owls, and effects on important prey species of northern spotted owl including red tree vole and flying squirrels.

The Forest Service should strive to conserve the maximum extent of suitable spotted owl habitat as possible to help ensure survival of the species, and thinning of stands that are suitable spotted owl habitat should be minimized to conserve sufficient canopy cover. Suitable stands for nesting and roosting are generally characterized by moderate to high canopy cover of 60 to 80 percent.[1] Additionally, foraging habitat for northern spotted owl in the West Cascades/Coast Ranges of Oregon and Washington are also characterized by moderate to high canopy cover of 60 to 80 percent.[2]

[1] Endangered and Threatened Wildlife and Plants; Designation of Revised Critical Habitat for the Northern Spotted Owl, 77 Fed Reg. 71876, 71906-7 (Dec. 4, 2012).
[2] *Id.* At 71, 907.

Additionally, the Forest Service should analyze the cumulative impact of the Project when considered along with other projects close in space and time. These projects include but are not limited to Calloway, Divide, Fish Lake Fire Resilience, and South Fork Delta Restoration Expansion. Cumulatively, removal of habitat within the Willamette National Forest has the potential to affect the species' survival, especially considering competition with the barred owl.

The Forest Service should also disclose what other species listed as threatened or endangered under the Endangered Species Act are present in the Project area, and whether any habitat for listed species is present. Additionally, please describe how the Forest Service will comply with forest standard FW-121 requiring cooperative management between federal and state agencies to maintain viable populations of all existing native and desired non-native plant and animal species in the Project area, and how the Forest Service will adhere to ORS 496.012 as also required by FW-121.

4. Fuel Breaks

The Project proposes to treat 1,790 acres of roadside shaded fuel breaks, including 772 acres that overlap with the proposed thinning units. Treatment of roadside shaded fuel breaks is intended to provide firefighters with opportunities to improve their effectiveness and safety, prevent further wildfire spread, and protect resource values at risk from wildfire. Shaded fuel breaks have the potential to increase or decrease fire risk, depending on how they are designed and implemented. If used correctly, fuel breaks can be a useful tool for fire management, but done incorrectly, they can make fire risk worse and cause a lot of unintended adverse trade-offs. Adverse trade-offs include but are not limited to spread of weeds, habitat fragmentation and edge effects, exacerbating barriers to wildlife movement, impaired wildlife connectivity, loss of snag and dead wood habitat, facilitation of unauthorized OHV use, and increased carbon emissions.

The Forest Service should implement fuel breaks non-commercially to meet the purpose and need of reducing wildfire risk. Doing so non-commercially may help prevent some of the adverse trade-offs associated with commercial logging and heavy equipment use. The Forest Service should also ensure that sufficient canopy cover is maintained in the shaded fuel breaks. If the canopy is too open, the fuel breaks will receive significantly more sunlight leading to hotter, drier and windier conditions and increased growth of surface and ladder fuels. These conditions will lead to increased fire risk if the shaded fuel breaks are not maintained over time and fuels are allowed to develop. The Forest Service should disclose its plan for short-term and long-term maintenance of shaded fuel breaks to meet the purpose and need of reducing wildfire risk, including whether the Forest Service will have sufficient personnel and funding to implement maintenance. If the Forest Service is unable to maintain the fuel breaks, then the purpose and need would be better served by leaving significantly more canopy cover in shaded fuel breaks to provide cool and moist microclimates that reduce fire risk. Additionally, the Forest Service should leave older, larger trees that are naturally more resistant to fire and instead focus thinning on smaller-diameter trees of less than 9" dbh within the fuel breaks. The width of the fuel break should also be limited to 150 feet from the road on either direction. A wider fuel break

may be ineffective in meeting the purpose and need while also requiring more resources in maintenance to maintain efficacy.

Oregon Wild also recommends that the Forest Service incorporate the following into shaded fuel break treatments:

- Focus fuel breaks in plantations and previously logged stands while minimizing treatment in mature and old-growth stands, riparian areas, and roadless/unroaded areas.
- Maintain diverse vegetation including hardwoods that are naturally more resistant to fire than softwoods.
- Use manual treatments such as hand felling, lop-and-scatter and burning small piles instead of heavy equipment to help protect soil, water quality, and fire resilient native plants.
- Retain mid to high canopy to help maintain cool, moist microclimates and provide more cover for wildlife.
- Adjust prescriptions in response to different forest and stands types to retain more density in moist forest types and a bit less density in dry forest types.

The NEPA analysis should evaluate the impacts based on different alternatives for thinning intensity and the impacts to wildlife habitat and connectivity. Please also disclose whether the Forest Service intends log shaded fuel breaks to meet timber volume quotas.

5. Effects of Roads

The Project provides for maintenance of existing roads for safe access and construction of temporary roads to support harvest operations. The Forest Service plans to decommission temporary roads after use to reduce environmental impacts. Oregon Wild appreciates that the Forest Service will maintain existing roads for safe access, and Oregon Wild encourages the Forest Service to focus treatments in stands that are accessible from already existing roads. Temporary roads should be limited to only short spurs that access young plantations where the benefits of treatment outweigh the negative effects of road construction. Even though "temporary" in name, the effects of temporary roads are long-lasting and may persist even after the roads are decommissioned. The effects of new roads include increased landscape fragmentation, modification of wildfire behaviors, increased likelihood of erosion and risk of landslides, introduction of sediment into waterways, spread of invasive weeds, increased risk of fire starts, and introduction of trash and litter.

The Forest Service should analyze the impacts that road construction within the project area will have on soil, water, vegetation, wildlife, and fire risk. Additionally, the Forest Service should analyze whether any roads within the project area can be decommissioned or stored. Reducing the road network will avoid environmental impacts of road use while also decreasing the backlog of road work that is needed in the Willamette National Forest to repair degraded roads for environmental protection and safe access.

6. Effects to wilderness and roadless areas.

The Project area is adjacent to both wilderness and roadless areas. The Mount Washington Wilderness lies to the east of the Project area, and several inventoried roadless areas and citizen-inventoried roadless areas are found in the eastern and southeastern portions of the Project area. The Forest Service should analyze how the proposed treatment units and shaded fuel breaks found nearby or adjacent to both the wilderness area and roadless areas affect the characteristics of those designations.

7. Meadow Restoration.

In the Flat Country Project occupying the same project area, the Forest Service included 150 acres of meadow restoration in the Bunchgrass Meadow complex in the Forest Service's preferred alternative. The goal of this meadow restoration was to maintain one of the largest meadows in the Upper McKenzie Watershed. Restoration activities within the meadow would have been completed without road construction, and harvest of encroaching trees would have been conducted over snow or by helicopter. The Forest Service should consider including the same or similar meadow restoration in the Tie Project using stewardship contracting to apply logging revenue towards ecosystem restoration.

8. NEPA analysis

The Project has the potential to have significant impacts on the environment, so the Forest Service should consider preparing an EIS, or at the very least, should prepare multiple alternatives in the EA to evaluate different treatment options and weigh differing environmental impacts. Significant impacts include those to mature and old-growth stands, impacts to northern spotted owl and its habitat, impacts to other wildlife species, impacts on fire risk, and impacts from road maintenance and construction. In its analysis, the Forest Service should be sure to weigh the trade-offs of the proposed thinning against the negative impacts described in these comments. The Forest Service should also be clear in the purpose and need section of its environmental analysis that variable density thinning and shaded fuel breaks accomplish two different purposes and therefore have different treatments.

Oregon Wild is concerned that the Forest Service may target some of the same older units proposed for treatment in the Flat Country project due to the overlap of the project area between this Project and the Flat Country project. The Flat Country project was highly controversial, and if some of the units are the same, the Forest Service should disclose the overlapping units in its environmental analysis.

Oregon Wild appreciates the Forest Service engaging with the public during the scoping phase of this Project and for considering the input provided in these comments. We look forward to continued involvement and collaboration with the Forest Service, ODF, and Sundance in the development of the Tie Project.

Sincerely,

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