



January 28, 2026

Objections Reviewing Officer

Molly Juillerat  
Forest Supervisor  
Rogue River-Siskiyou National Forest  
Attn: 1570 Appeals and Objections  
3040 Biddle Road  
Medford, OR 97504

**RE: SNOWY BUTTE LANDSCAPE RESTORATION PROJECT OBJECTION AS PER 36 C.F.R. 218**

**Project Name:** Snowy Butte Landscape Restoration Project

**Responsible Official:** District Ranger Lana Cruz

**Pertinent Ranger District:** High Cascades Ranger District

Thank you for accepting this objection pursuant to 36 C.F.R. 218 from the Klamath-Siskiyou Wildlands Center (KS Wild) regarding portions of the Snowy Butte Landscape Restoration Project.

While KS Wild supports many elements and objectives of the Snowy Butte project including addressing shade-tolerant white fir encroachment and meadow restoration. We offer this Administrative Objection in the hopes of providing feedback that will assist the Forest Service in achieving the purpose and need for the project.

We appreciate the agency's incorporation of suggestions originating from a wide spectrum of organizations and entities during project planning. We believe that the Snowy Butte planning process has been collaborative and that the Forest Service has benefited from robust public and stakeholder involvement.

This Objection is timely as it was submitted prior to the close of the 45-day time period, pursuant to 36 C.F.R. 218.9(a). KS Wild has submitted the required timely, specific written comments during opportunity for public comment, pursuant to 36 C.F.R. 218.5, and issues raised in this objection were previously raised in public comments, pursuant to 36 C.F.R. 218.8(c).

## Scope of this Objection

As per 36 C.F.R. 218, this Objection applies to the following activities authorized in this project:

1. Failure to Implement Seasonal Protections for Western Pond Turtles
2. Utilization of Tethered Logging on Steep Slopes
3. The Dramatic Increase in Timber Volume That Occurred After Project Scoping
4. Logging Treatments Followed by Speculative or Uncertain Application of Prescribed Fire
5. Larger/Older Tree Removal from the LSR Land Use Allocation

KS Wild's November 7, 2025, comments regarding the Snowy Butte project Draft Environmental Assessment (DEA) raised the issues that are the basis of this Administrative Objection and are part of the Administrative Record for this project.

**Objection Point #1: The agency failed to incorporate seasonal restrictions for the benefit of the Northwestern Pond Turtle, a species proposed for federal listing under the ESA, a species designated as “sensitive” by the Regional Forester, and a species likely to be adversely affected by the Snowy Butte project.**

Page 88 of the final EA for Snowy Butte indicates that Northwestern Pond Turtles (NWPT) have a high probability of occurrence throughout the project area and will likely be adversely affected by the project, particularly turtles reliant upon overwintering habitat that will be impacted by project activities.

While overwintering NWPT enter a state of dormancy known as brumation to slow metabolism and survive winter conditions including cold temperatures and limited food availability. During this period, turtles will bury themselves in mud, leaf litter, or forest duff often up to 500 meters away from aquatic habitat and emerge the following spring. This is a period of significant vulnerability for turtles.

The Forest Service is correct in asserting that the overwintering period may occupy a substantial portion of the year. However, it is largely incorrect in its conclusion that implementing protective measures this period would preclude fuels and forest management activities. On page 206 of the EA, the Forest Service states that seasonal protections cannot be applied because the overwintering period (August through mid-June) overlaps with allowed fuels treatment windows. This overstates the obstacles to effective turtle mitigation measures.

For turtles in southwest Oregon, the overwintering timeframe referenced by the Forest Service substantially inflates the typical overwintering period. Turtles generally do not

begin migrating away from aquatic habitats until temperatures cool in late September to November. In a study which radio-tracked 12 NWPT in the Trinity River of northern California, all 12 turtles commenced overwintering between September and December (Reese & Welsh 1997). Emergence from brumation and overwintering sites typically begins in spring as temperatures warm, most commonly starting as early as March. This overwintering timeframe, while it does vary, is more accurate and provides a substantial window during which fuels and forest management activities could be implemented while avoiding impacts to overwintering turtles.

An effective seasonal restriction for the NWPT need not consist of complete avoidance of ground-disturbing activities from August to mid-June. Protective measures could be implemented primarily from October through February, when turtles are most likely fully brumating, immobile, and at their most vulnerable. Fuels treatments could occur in early fall and late spring, when turtles are still active or beginning to emerge and are capable of moving away from disturbance. Pre-disturbance surveys could be conducted prior to ground-disturbing activity in overwintering habitat or phased implementation of activities could be planned such that undisturbed refuge may be retained and available.

It is also important to note that hatchling turtles tend to overwinter in their nesting site and emerge in spring (Holte 1998). Hatchlings are at their most vulnerable lifestage and it is vital they are taken into consideration for long-term success of populations.

As mentioned in our DEA comments and acknowledged in the EA, there is a robust and ***regionally important population of NWPT at Willow Lake*** where upland terrestrial habitat may be impacted by timber sale activities. This represents a crucial turtle population that could greatly benefit from implementation of seasonal restrictions on ground-disturbing activities or pre-disturbance surveys.

**Proposed Objection Resolution Item #1:** Consider implementing more tailored seasonal restrictions or pre-disturbance surveys prior to impacting upland habitat near Willow Lake for the benefit of NWPT conservation.

**Objection Point #2: The draft decision document authorizes ground-based tethered logging on steep slopes up to 70% with limited peer-reviewed or site-specific analysis.**

Page 135 of the EA indicates that the Forest Service intends to utilize tethered-assisted ground-based logging systems on slopes up to 70% despite acknowledging that these are “relatively new systems” with few peer-reviewed studies disclosing the impacts to soil resources. Little site-specific information regarding the location, impacts and extent of this yarding mechanism is provided in the EA.

The impacts of tethered yarding on steep slopes vary significantly depending on terrain, soil type, slope stability, and watershed conditions. Without sufficient site-specific

environmental review the agency risks implementation of a little-understood ground-disturbing activity that may lead to irreversible consequences for watershed and soil resources.

As disclosed by the Forest Service on page 214 of the EA, the Northwest Forest Plan and land management plan for the Rogue River-Siskiyou National Forest did not analysis, anticipate or authorize tethered logging “since they developed after these Plans were signed.”

The video provided by the Forest Service provides a visual depiction of tethered yarding practices but is not a surrogate for substantive analysis or site-specific data and information.

The agency references a 2017 study by John Sessions et al. in which the authors conclude that “[t]ethered machines are likely to be able to negotiate steeper terrain, potentially increasing soil disturbance in comparison with conventional falling methods,” and “[o]ne particular note is that extreme variability exists in soil conditions, not only from site to site but also within a given site.” Further, this analysis was limited to linearly elastic soils. These determinations underscore the need for site-specific, rigorous environmental review prior to the authorization of tethered yarding on steep slopes in the Snowy Butte project area.

The Forest Service EA also relies upon the 2018 study by F. Belart et al. but fails to acknowledge that “[s]oil properties are highly variable between and even within a given site, a complexity that makes generalization of results difficult” (Belart 2018, p. 308).

KS Wild’s EA comments included a peer-reviewed 2019 study by C.W. Chase finding that “despite the rapid growth of tethered harvesting systems, little is known about the environmental performance of operating these systems on steep slopes,” and that “further research could contribute to evolving best management practices and aligning forest practice regulations with current technologies.” These conclusions highlight the fact that the research, particularly for long-term impacts, is so limited on this practice that it is hard to conclude the best management practices and project design criteria proposed by the agency will be sufficient to keep detrimental soil disturbance below 10% as anticipated. The authorization of tethered yarding on steep slopes without site-specific analysis and meaningful data is an action that may result in significant impacts to soils and hydrological resources necessitating completion of an EIS.

The agency’s reliance upon the 2019 study by A. M. Garren et al. is erroneous given findings about how important site-specific soil conditions are when analyzing the environmental impacts of tethered yarding. Soils in Brazilian eucalyptus plantations are likely not comparable to the soils found in the Snowy Butte project area, and results from those plantations cannot be generalized to discount negative soil impacts in this project area.

The Forest Service also references the 2022 study by K. M. Fagundes in which the author notes that “[r]elatively few studies have attempted to quantify soil disturbance with this

new practice.” Again, the author indicates that site-specific environmental conditions are crucial in quantifying long-term impacts regarding how “susceptible a site is to soil compaction and the extent to which soils are visually disturbed.” The Forest Services uses this study to assert an alleged lack of detrimental soil disturbance; however, the author explicitly notes that “[t]he initial site conditions [i.e. high rock content, south-facing aspect] could have also led to the low observed disturbance,” and that “[t]he study has many limitations.” It is crucial that the Forest Service disclose where it proposes utilization of tethered logging operations as these site-specific conditions are directly indicative of resulting soil disturbance.

The results of these studies are sufficient neither in number nor substance to conclude that the agency will prevent detrimental soil disturbance from exceeding 10% during tethered-assisted logging operations. The analysis relied on in the EA is inadequate to support the authorization of such activity. The Forest Service must disclose the exact sites and locations, including aspect and soil types, where the agency proposes to utilize such operation.

**Proposed Objection Resolution Item #2:** Prior to authorizing tethered- or winch-assisted logging operations, please disclose to the decisionmaker the public the location and site-specific soil types and conditions where this activity will occur. Alternatively, please restrict ground-based yarding on steep slopes >35% as envisioned by the NW Forest Plan and as has been successfully implemented by the agency for decades.

**Objection Point #3: Uncertainty regarding the significant projected timber volume increase that occurred after project scoping.**

When the Snowy Butte timber sale scoping notice was released for public commenting the agency anticipated that the project would produce 18 mmbf. The Forest Service now indicates that the project is expected to produce 54 mmbf yet the environmental review is silent as to the reasons for the significant increase in timber volume and the effects of the additional logging, yarding and hauling on terrestrial and aquatic values of concern. The planning area footprint and acreage do not appear to have meaningfully changed between scoping and the DEA, so what accounts for the large increase in projected timber volume and why was this increase not discussed and analyzed in the DEA? How will the dramatic increase in timber volume affect the number of new log landings? How much additional acreage will be impacted by yarding activities? How will significantly increased timber haul impact roads and aquatic resources?

**Proposed Objection Resolution Item #3:** Please disclose the location and impacts of new log landings and additional yarding locations related to the significant increase in timber volume associated with the Snowy Butte project.

#### **Objection Point #4: Ensuring timely prescribed fire treatments**

Successful implementation of the Snowy Butte project necessitates follow-up fire treatments that are essential to ensuring that the fuels treatment and forest thinning efforts are effective over time. This is generally going to require a broadcast burn in the units after any pile burning or mechanical thinning. The effects of this type of surface fire are needed to reduce the ground and ladder fuels and emulate natural and cultural fire that were common prior to the era of fire exclusion.

***We are very concerned with the ongoing glacial pace and scale of prescribed fire on the Rogue River-Siskiyou National Forest.*** From our perspective outside of the Forest Service, it can appear that while logging implementation is inevitable and timely, that follow-up prescribed fire maintenance treatments are spotty, delayed, speculative and uncertain to occur. We understand that there are limitations on the utilization of prescribed fire. Burn windows, smoke regulation, and agency fear of unintended consequences are all legitimate concerns. However, the USFS needs to increase prescribed fire by orders of magnitude if it has any chance of maintaining fuel reduction goals. If the agency can ensure that logging occurs then it must also ensure that it actually implements prescribed fire in a timely and thorough manner.

**Proposed Objection Resolution Item #4: Provide assurances to the objecting party regarding the scale and timing of prescribed fire treatments.**

#### **Objection Point #5: REO Authorization to exceed LSR size and age standards and guidelines during logging activities**

The Snowy Butte Draft Decision Notice and FONSI indicates that the Forest Service has obtained REO permission to exceed standards and guidelines designed to retain older and larger trees on 3,987-acres within the LSR land use allocation. The logging of large trees and older forest stands on 3,987-acres within the LSR seems like a significant action impacting the forest character and wildlife habitat within the reserves. The Forest Service rationale for these logging prescriptions are extremely broad and vague and include the objectives of lowering stand density, increasing structural diversity, shifting trees species, treating insects and disease and protecting the Fish Lake developed infrastructure. These objectives are so broad, and the proposed acreage is so large, that it is impossible for the

public or the decision maker to know where and why larger/older trees will be removed from LSRs in contravention of the NWFP standards and guidelines for that land use allocation.

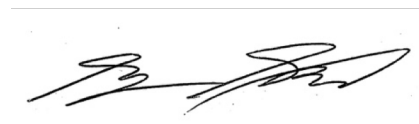
**Proposed Objection Resolution Item #5: Provide site specific information regarding the location, number, species and rationale for tree removal in the LSRs that exceeds the standards and guidelines for management within that land use allocation.**

## **Conclusion**

***KS Wild supports the forest resilience and restoration objectives of the Snowy Butte project and appreciate the proposed white fir removal, meadow restoration, prescribed fire, and plantation thinning.*** We ask that the Forest Service take meaningful steps to ensure conservation of the threatened Northwestern Pond Turtle near Willow Lake. We ask that the Forest Service reconsider implementation of tethered yarding on extremely steep slopes, or at the least, disclose the locations, aspects, and site-specific soil conditions where this activity will occur. We seek clarity in the reasons for the dramatic increase in projected timber sale volume from this project. We hope to achieve certainty regarding the extent and timing of prescribed fire fuels treatments. Lastly, we want to know the location and rationale for large tree removal within the LSR land use allocation.

Thank you for considering the suggestions and concerns that are raised in this Administrative Objection. We look forward to discussing resolution of these items with the Forest Service and believe that the process will aid the agency in achieving the purpose and need for the Snowy Butte project.

Sincerely,



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