



May 22, 2026

Nikki Swanson  
District Ranger  
Sweet Home Ranger District  
Willamette National Forest  
4431 Highway 20  
Sweet Home, OR 97386

**In Reply To:** Cala-Wiley Draft EA

Dear Ms. Swanson:

American Forest Resource Council (AFRC) is a regional trade association whose purpose is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies, and decisions regarding access to and management of public forest lands and protection of all forest lands. AFRC represents over 50 forest product businesses and forest landowners throughout the West. Many of our members have their operations in communities adjacent to the Willamette National Forest, and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. The state of Oregon's forest sector employs approximately 61,000 Oregonians, with AFRC's membership directly and indirectly constituting a large percentage of those jobs. Rural communities, such as the ones affected by this project, are particularly sensitive to the forest product sector in that more than 50% of all manufacturing jobs are in wood manufacturing.

AFRC is pleased to see the Sweet Home Ranger District (SHRD) proposing vegetation management on lands designated as Matrix, LSR, AMA, and Riparian Reserve Land Use Allocations that will likely provide useful timber products to our membership. Our members depend on a predictable and economical supply of timber products off Forest Service land to run their businesses and to provide useful wood products to the American public. We are also glad to see that the SHRD has recognized the importance of supporting local economies with forest

products off Forest Service land by including the provision of that support in the Purpose & Need for the Cala-Wiley project.

AFRC believes that the provision of useful raw material off National Forest Service land is an integral component of the agency's multiple-use mission. In recent years, many Forest Service Districts have opted to omit the provision of useful raw material from the purpose & need statements of vegetation management projects. AFRC has warned against this practice as it marginalizes the appropriateness of this provision to the agency's mission. Most all Forest Service vegetation management projects achieve an array of positive outcomes. One of these positive outcomes is a sustainable supply of wood products, and we thank the SHRD for recognizing this in the Cala-Wiley project.

## **RIPARIAN RESERVES**

We are pleased to see the SHRD incorporate commercial thinning in some Riparian Reserves within the Cala-Wiley project. Often, stands proposed for thinning treatment in the uplands have the same undesired forest conditions (overly dense and uniform stands) in riparian areas. The forest health benefits that you expect to attain through upland thinning treatments can also be achieved in riparian areas with similar active management prescriptions. Allowing some commercial harvest will not only produce usable forest products, but it will also improve structure and promote greater resiliency in the Riparian Reserves.

## **ROAD DECOMMISSIONING**

We are pleased to see that only those temporary roads needed to facilitate this project's proposed actions will be considered for decommissioning in the Cala-Wiley EA. The land base covered in the Cala-Wiley project area is to be managed for a variety of forest management objectives. Removal of adequate access to these lands compromises the agency's ability to achieve these objectives and is very concerning to us.

## **WET SEASON OPERATIONS**

We appreciate your language in PDF Aquatics 19 (EA Page 53), which permits operators to haul during the wet season when conditions are unseasonably dry, or along roads which are properly designed to limit sedimentation during wet conditions. We are similarly pleased with your language in PDF Aquatics 12 (EA Page 51), permitting road maintenance and reconstruction during the wet season along road segments which are hydrologically disconnected from streams. Constructing forest roads is essential if active management is desired, and we are glad that the SHRD is proposing the roads that are needed to access and treat as much of the project area as possible in an economically feasible way.

Likewise, we appreciate your language in PDF Soils 1 (EA pg. 45) which prohibits ground-based operations “during wet conditions”, without imposing strict seasonal restrictions. Consistent and steady operation time throughout the year is important for our members not only to supply a steady source of timber for their mills, but also to keep their employees working. These two values are intangible and hard to quantify as dollar figures in a graph or table, but they are important factors to consider. The ability to yard and haul timber in the winter months will often make the difference between a sale selling and not.

## HELICOPTER LOGGING

In our scoping comments for this project, we urged the SHRD to take a hard look at using temporary roads to facilitate yarding in areas identified for helicopter yarding. Unfortunately, the District does not appear to have performed such an analysis. This is, obviously, very disappointing from AFRC’s perspective for several reasons.

First, AFRC worries about the economic impact that this decision will have on sales resulting from the Cala-Wiley analysis. As we noted in our scoping comments, helicopter yarding is, by far, the most expensive yarding system available to local purchasers. For this reason, we also noted that helicopter yarding should only be used as a last resort for any logging project.

Second, we are also concerned with the District’s proposal to require helicopter logging without disclosing those areas in your Draft EA. This makes it very difficult for AFRC to assess the District’s decision. Presumably, since every unit proposed for commercial thinning in your Draft EA was previously managed, this area was most recently logging via conventional logging methods (i.e. ground and/or skyline yarding). We are left to assume that the District is deferring the decision to open decommissioned roads in favor of a niche logging system that can only be completed by a narrow pool of operators. To avoid confusion, **we urge the District to disclose the exact areas in the Cala-Wiley project where helicopter yarding is proposed.**

For any Forest Service project with a commercial component, particularly those areas within the Matrix or AMA LUAs, the Forest should strive to make those sales as financially viable as possible without compromising those other resources that the forest provides. Constructing forest roads is essential where active management is desired and proper road design and layout should pose little, if any, negative impacts to water or soil resources. Again, we urge the SHRD to take a hard look at accessing those proposed helicopter units via temporary roads to facilitate conventional yarding systems. **We urge the District to perform a financial analysis comparing the costs associated with helicopter yarding when compared to conventional ground-based or skyline systems.**

For those sales in which helicopter yarding is required, it will be critical for purchasers to be able to operate in the winter months. Securing helicopters in the summer months is extremely difficult for our membership, primarily due to competing needs for fire suppression. **Ensuring**

**that roads that access helicopter units are available for wet season hauling is critical to the successful implementation of those units.**

## **TETHERED ASSIST LOGGING**

In our scoping comments for this project, we urged the SHRD to include in your analysis a discussion on utilizing tethered assist (TA) for sales resulting from this project. Unfortunately, the SHRD did not include TA as a potential harvest system in the Cala-Wiley Draft EA. As we noted in our scoping comments, TA is becoming a more economical, safe, and available method of steep slope logging in Western Oregon. **Again, we urge the SHRD to reconsider their decision to exclude the use of TA for sales resulting from this analysis. Please include a discussion on the use of TA as a possible harvest system for steep slopes in the Final Cala-Wiley EA.**

AFRC is happy to be involved in the planning, Environmental Assessment, and decision-making process for the Cala-Wiley Project. Should you have any questions regarding the above comments, please contact me any time at 541-521-9143 or [cbingaman@amforest.org](mailto:cbingaman@amforest.org).

Sincerely,



Corey Bingaman  
Oregon State Manager  
American Forest Resource Council