The Friends of Douglas-Fir National Monument (Friends) submit the following comments concerning the Detroit Ranger District's Environmental Assessment (EA) of the Divide Project (Project #56803). The Friends generally support the concept, even the need for, scientifically based ecological restoration thinning of almost all plantation stands of the national forest. To the extent that this Project proposes that activity, and associated activities, such as the careful rehabilitation of existing roads in a way that reduces or minimizes ongoing erosion from such roads, the rehabilitation of eligible streams through the reintroduction of streamside diversity and the placement of large logs in streams, and similar actions designed to restore the forest to its natural environment and progress toward more mature and natural seral stages, the Friends would be in support of the Project without amendment.

There are, however, several errors or contradictions in the EA that make the EA as it stands unsupportable. There are two options to address these problems. One resolution would be to develop an Environmental Impact Statement (EIS) which gives full consideration to alternative approaches and selects the alternative that resolves the contradictions. The second option would be to make adjustments to the Project, by removing any mechanical treatment of natural (naturally regenerated) stands. This latter alternative would address the problems in a way that would remove the need for an EIS and remove the possibility of further challenges to the EA.

The changes that need to be addresses include:
1. Eliminate any thinning of naturally regenerated stands, regardless of their current age;
2. Avoid treatments that emphasize development of early seral areas in naturally regenerating stands in proximity to vast amounts of early seral habitats that have been created due to the Lionshead and other fires.

Discussion

The Divide EA provides an examination of the environmental impacts of the Project. In parts the EA is thorough and provides support for the Project and demonstrates why no further analysis is needed. There are, however a few places where the analysis is improperly truncated, or contains internal contradictions between the proposals for treatment and the evidence or rationale, or asserts unsupported conclusions. These analytical failures need to be addressed, either through modification of the project, or a more thorough analysis through an EIA.

Treatment of Naturally Regenerating Stands

The EA justifies inclusion of stands that arose naturally after fires or other natural disturbance and are now are progressing along a natural regeneration path by stating a circular rationalization for the intent to include these stands. The EA provides two reasons for inclusion of these older stands, which make up forty percent of the total project area: first, the EA states that, "*outside tree age* the stand conditions and characteristics described by commenters" (of what would be late seral or mature) stands are not present, then the EA concludes that limiting treatment of these would not meet the overall purpose and need of the project.

The age of a stand should be no indicator in determining how the stand is treated. Stand origination, more than age, should be the determining factor. If a stand has or is naturally regenerating after a fire, or other natural disturbance, the stand will reflect the natural internal diversity and density appropriate to the forest at that age of seral development. Not having reached mature seral

characteristics does not mean that stands in the middle seral stage are not moving toward a mature seral forest. Without any justification or analysis, the EA concludes that these stands have some sort of unnatural density that must be treated. Growth maximization of certain trees is inconsistent with the stated goal of developing the equivalent of naturally occurring late seral or mature forests. It is not surprising that stands that are at a relatively early stage of mid-seral development do not have the characteristics of a late seral forest, thus the EA dismissal of any alternative except no action is illogical and unsupported by any appropriate analysis.

In the same way, it is not a supportable rationalization for including these naturally regenerating stands in the proposed areas for commercial thinning, by saying that excluding them would not meet the overall purpose and need when there is no in-depth consideration of an alternative that evaluates how much modification of the Project would result from excluding or limiting treatment of these stands. When the purposes of the Project are defined in such a way as to rationalize and justify the treatment of naturally regenerating stands of timber, it is not a legally supportable conclusion to justify the inclusion of these stands by suggesting that exclusion would not meet the Project purposes.

The EA rationalizes treatment of the plantation stands as a way to reintroduce natural species diversity lost when artificial monoculture planting occurred. But the EA recognizes that the naturally regenerating units already include a naturally occurring diversity of species. "Natural stands in the project area are generally the result of stand replacing fires roughly 120, 240, and 300 years ago. These natural stands have a variety of structures based on the intensity at which they burned. Lighter intensity fires underburned portions of some of the older stands, removing the younger trees, snags, and large downed logs. In other areas they burned more intensely, creating new stands in a variety of sizes and structures." There is already species diversity in the naturally regenerating units included in the Project: "Douglas-fir is the dominant overstory species in many stands with a broader mix of species in most of the natural stands and some plantations. These other species include western redcedar, western hemlock, noble fir, and pacific silver fir." Later in the analysis the EA argues that without including the older stands and units, the Project will not meet its goal of species diversity. If the older units are to be included in the project, the project must do a more detailed EIS to explain this clear contradiction in findings and rationale.

If the District relies on the creation of stand diversity as a part of the rationale for the Project, then it must recognize the differences between complex (naturally regenerating) and simple (artificially regenerated) early seral forest (conifer canopy has not yet closed) or young forest (conifer canopy has closed) of either type. As the EA acknowledges, there is a shortage of mature (generally having reached the culmination of mean annual increment) and old-growth stands, which are characterized as having a naturally high level of species diversity. Naturally regenerated forests, of any age, which already have a naturally high level of species diversity, are on their way to achieving mature forest character without the need for any level of thinning or other treatment. There is a conflict between timber production and the goal of having a natural regenerated stand move toward maturity, which, in the current EA, can only be resolved by eliminating timber production on naturally regenerated stands. If the Project's goals for timber production and improving natural diversity are to be reconciled, the Project must include thinning of more plantation stands.

The EA creates an artificially limited and self-rationalizing analysis to justify inclusion of treatment of naturally regenerating stands by creating only one alternative (the No Action alternative), which was more of a straw man than a realistic alternative. The EA sets a goal of achieving an old-growth type forest. "Many of the aquatic and riparian-dependent species need complex stand

structures like those found in old-growth stands in order to thrive." To justify thinning plantations and naturally regenerating stands, the EA overlooks its own description of naturally regenerating stands as having naturally occurring species diversity, when it says that, without treatment, "several hundred acres of Riparian Reserves would remain in dense homogenous stand conditions until natural processes created openings in which hardwoods and understory species could thrive. This could take several decades. Meanwhile aquatic habitats would continue to experience low volumes of downed wood and a lack of hardwood leaf litter. Deciduous trees provide leaf matter to streams that is of higher nutritional quality than conifer needles, and provide greater shade cover in the summer months to keep stream temperatures cooler."

Naturally regenerating stands are closer to achieving the characteristics of a mature forest, and do not need treatment to continue towards that stage. Such treatments are not only ecologically harmful, but come at the expense of treatments in plantation stands that could benefit ecologically from treatment. It is no justification to say that it will take several decades to achieve this state. It will take more than several decades for any of these units, whether plantation or naturally regenerating stands to achieve the characteristics of mature forests which are, by definition, at least several hundred years old.

Creating early seral areas from Naturally Regenerating stands

The Project proposes to create early seral areas and new sugar-pine stands apparently by clearcutting naturally regenerating areas rather than from plantation areas. The EA acknowledges that more than nine percent of the Project area has been burned during the Lionshead fires, which also extends for miles to the north. There is no analysis in the EA as to why clearcuts are necessary on naturally regenerating units so close to a major burn area and adjacent to plantation stands. This analytical omission can only be addressed by better analysis in an EIS, or by removing the units targeted for clearcutting that are also naturally regenerating units from the Project.

Riparian Area Protections

The Riparian areas within the naturally regenerating stands should be eliminated from the project for the same reasons that the rest of the naturally regenerating units should be excluded.

Conclusion

The rationale for the project is that it is necessary to actively manage all the selected units in order to promote growth, diversity and structural complexity. Without consideration of any alternatives that would assess less aggressive or less extensive management, the EA includes 777 acres (40% or the total Project) naturally regenerating stands that are characterized by natural growth patterns and exhibit the natural diversity and structural complexity of Cascade forests. There is no consideration of an alternative that would apply all the desired treatments to only plantation stands. There is no justification, indeed there cannot be any rational argument, for treating naturally regenerated and artificially regenerated stands as ecologically equivalent. The District must develop an EIS to consider these issues. If it does not the District must drop the naturally regenerating units from the Project. If it chooses this second option, the EA is adequate to justify moving forward. The alternative which would maintain the level of timber production would be to include more plantation stands.