



**ROCKY MOUNTAIN  
ELK FOUNDATION**

December 16, 2025

Detroit Ranger Station  
Attn: Divide Project  
Willamette National Forest  
44125 N Santiam Hwy  
Detroit, OR 97360

Re: Divide Project Draft Environmental Assessment (EA)

The Rocky Mountain Elk Foundation (RMEF) appreciates the opportunity to comment on the Divide Project Draft Environmental Assessment (EA) and supports the active forest management proposed for the Project area.

U.S. Forest Service (USFS) lands within the Project area require a focus upon active forest management to restore and enhance early seral vegetation, meadows, and riparian habitats essential for supporting elk and other big game.

RMEF requests the USFS consider the following:

- The Draft EA indicates ~2000 acres of the 2020 Lionshead wildfire lies within the Divide Project area and is providing new quality early seral habitat. RMEF suggests including information about restoration efforts within the fire perimeter and how, specifically, it is providing early seral habitat.
- There is a discrepancy in the acres of 'Gap' areas to be created: 20 acres (p. 19) and 38 acres (p. 34). Please clarify.
- RMEF supports the Draft EA in decommissioning and seeding the Project's 8.6 miles of temporary road. Please consider inclusion of right-of-way seeding.
- RMEF supports the proposed pre and post treatments for invasive vegetation management.
- The Draft EA and Wildlife report identify mule deer and Rocky Mountain elk as Management Indicator Species (MIS) on the Willamette National Forest. However, the Willamette National Forest Plan identifies blacktail deer and Roosevelt elk as MIS. Please clarify.
- The Divide Project lays within the Oregon Department of Fish and Wildlife's (ODFW) Santiam Wildlife Management Unit and both deer and elk are below Management Objective within the unit. Lack of forage in both quantity and quality is thought to contribute to the low deer and elk populations. RMEF requests that the USFS coordinate with ODFW to include commentary on big game management goals in the Draft EA.

- In the Agencies and Persons Consulted section of the Draft EA, ODFW is not included as an agency consulted. Please clarify if this is accurate as consultation with ODFW is a Willamette National Forest Plan Standard.
- RMEF appreciates the use of the Westside Elk Nutrition and Habitat Utilization model to analyze the impact of the Project for forage production and habitat utilization.
- RMEF appreciates consideration of road density in the Divide Project and encourages the use of best available science in road density decisions.
- Suggested map improvements:
  - Reduce the scale of the Vicinity Map to show landmarks allowing viewers to locate the project area in relation to nearby geographic features.
  - Include Township, Range, and Section (and latitude and longitude) on all maps in the Draft EA.
  - The Draft EA states that the Dry Beard Project overlays the Divide Project. Please include the treatment units from the Dry Beard Project on the Divide Project map to assess overall impacts.
  - The Draft EA indicates that a portion of the 2020 Lionshead wildfire is contained within the Divide Project area. Please include a map of the wildfire perimeter in relation to the Divide Project area.

RMEF appreciates the opportunity to engage in the Divide Project planning process.

Sincerely,



Karie Decker  
Director of Wildlife & Habitat