



December 17, 2025

Michelle King
District Ranger, Detroit Ranger District
Willamette National Forest
44125 North Santiam Highway SE
Detroit, OR 97342

In Reply To: Divide

Dear Ms. King,

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.

We are pleased to see the Detroit Ranger District (DRD) list "Provide a Sustainable Supply of Timber Products" as a *need* for the Divide project. We are similarly pleased that the District will accomplish this through vegetation management on lands designated as Matrix and Riparian Reserve LUA. AFRC 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. It is refreshing to see the District pursue active

management across numerous land allocations throughout the planning area. The consideration of active management on every acre of appropriate land, regardless of its land allocation, is important to our membership as each year's timber sale program for the Willamette National Forest is a function of the treatment of aggregate forested stands analyzed in individual projects.

In our scoping comments, we urged the DRD to consider treating the Divide landscape with harvest intensities beyond simply thinning. AFRC expressed concern that a strict thinning paradigm is not sustainable and creates a landscape where the Willamette will eventually run out of stands to thin. The only way to mitigate this concern and manage sustainably is to alter treatments in a way that creates openings for early seral habitat and remove a portion of larger trees while permitting smaller trees to grow.

With the above discussion in mind, we are generally pleased to see the DRD include "heavier thinning" and shelterwood regeneration harvest for some sugar pine stands for the Divide project. In addition to improving stand conditions, implementing a broader range of silvicultural prescriptions will also help you meet your stated purposes and needs to (1) provide timber products, (2) promote forest complexity, and (3) support biodiversity.

ROAD DECOMMISSIONING

Your scoping notice indicates that the forest is proposing to decommission only temporary non-system roads within the Divide project. **If additional road decommissioning is proposed in the EA, AFRC recommends that the DRD limit their selection to roads that are no longer needed for resource management and are at risk of failure or are contributing sediment to streams, consistent with valid existing rights.** The land base covered in the project area is to be managed for a variety of forest management objectives. Removal of adequate access to these lands would compromise the agency's ability to achieve these objectives.

QUARRY DEVELOPMENT

We are pleased to see the DRD include allowance for contractors to utilize existing Forest Service-owned rock pits to source suitable materials for road construction within the project area. Maintaining a nearby rock source will help the economic viability of future timber sales resulting from the project.

TETHERED ASSIST (TA) YARDING

We noticed that the draft EA did not analyze the potential use of tethered-assist (TA) equipment to log on steep terrain with harvesters and forwarders. The technology associated with this equipment, and the availability of contractors who employ this technology, has grown significantly over the past several years. New machines are being built lighter with less impact on the ground that they operate on. A track-mounted loader, for example, would be tethered at the landing. This displaces the weight to the source of the tethering and reduces the psi generated by the tracked equipment. Other Forests in the Region have permitted this equipment to be used on Forest Service thinning stands on slopes up to 70%. **We urge the DRD to consider allowing TA equipment to be used where appropriate in the Divide Project to mitigate potential implementation obstacles.** We believe modifications can be made to the EA to permit TA equipment, including harvesters and forwarders, without modifying the effects on the ground.

WET SEASON OPERATIONS

We appreciate the language in PDF Aquatics49 and Aquatics51, which allows for haul during the wet season, provided roads are rocked to sufficient depth and strength to avoid rutting, runoff and pooling. Similarly, we appreciate the language in PDF Soils 1, which prohibits ground-based operations during “wet conditions” without explicitly prohibiting ground-based operations during the “wet season” (typically occurring October 16 – May 14th) when ground conditions are favorable. Proper road design and layout should pose little to no negative impacts on water quality or slope stability. 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.

AFRC is happy to be involved in the planning, environmental assessment (EA), and decision-making process for Calloway Project. Should you have any questions regarding the above comments, please contact me at 541-521-9143 or cbingaman@amforest.org.

Sincerely,



Corey Bingaman

Western Oregon Field Coordinator

American Forest Resource Council