



VIA online submission:

<https://cara.fs2c.usda.gov/Public/CommentInput?Project=56803>

April 27, 2026

Duane Bishop, Forest Supervisor (Acting)
Willamette National Forest
3106 Pierce Parkway, Suite D
Springfield OR, 97477

RE: Divide Environmental Assessment Objection

Pursuant to 36 C.F.R. Part 218.8, the American Forest Resource Council (AFRC) files this objection to the proposed draft decision for the Divide Environmental Assessment (EA). Detroit District Ranger Michelle D. King is the responsible official. The Divide Project occurs on the Detroit Ranger District on the Willamette National Forest.

Objector

American Forest Resource Council
700 NE Multnomah, Suite 320
Portland, Oregon 97232
503-222-9505

AFRC is an Oregon nonprofit corporation that represents the forest products industry throughout Oregon, Washington, Idaho, Montana, California, and Nevada. AFRC represents over 50 forest product businesses and forest landowners. AFRC's mission 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. The Divide Project will, if properly implemented, benefit AFRC's members and help ensure a reliable supply of public timber in an area where the commodity is greatly needed.

AFRC has been closely involved in the Divide Project since its inception in 2020 when we submitted substantive written comments during the scoping period. We also closely reviewed the Draft EA and submitted written comments following its publication in 2025. Throughout this period of public engagement, we have attended informational meetings hosted by the Ranger

District, and made several field visits to various portions of the project area to review forest stand conditions, road infrastructure, and logging feasibility.

Objector's Designated Representative

Corey Bingaman, Oregon State Manager
2300 Oakmont Way, Suite 205
Eugene, OR 97401
541-521-9143
cbingaman@amforest.org

Reason for Objection

The content of this objection below is based on AFRC's prior specific written comments submitted in response to both the scoping notice and the Draft EA, which are hereby incorporated by reference.

Our primary point of concern throughout the Project's NEPA process was a general lack of diversity of treatment intensities throughout the proposed treatment area. This is especially true in those areas of Matrix LUA where we believe that the principles of sustained yield forestry should be applied in order to guarantee the long-term viability of the Agency's timber program. While we are pleased that gap creation, dominant tree release, shelterwood, and regeneration harvest were included in the Project's proposed actions, these prescriptions, taken together, represent only 307 acres, or approximately 16%, of the proposed treatment area. Considering the fact that the Forest is proposing skips across 324 acres of the proposed treatment area, we are generally disappointed that such a small portion of the Project will receive a treatment intensity greater than understory thinning.

Another point of concern raised during the Draft EA comment period was the issue of including tethered assist (TA) as a potential harvest system for timber sales resulting from this analysis. We noted in our written comments the growing importance of TA as a harvest system in Western Oregon. TA harvest systems are safer, more cost effective, and less impactful to forest resources when compared to conventional cable harvest systems. Unfortunately, for reasons explained in the Final EA, the Forest did not analyze the use of TA in the Divide Project.

Resolution Requested

We request that the Forest Service include analysis of the potential impacts of tethered-assist logging equipment into the EA. Omission of this analysis could significantly hamper the economic viability of future sales generated from this EA and limit the contractor pool able to operate on those sales.

We also request that the Forest Service reconsider expanding regeneration, gap creation, and dominant tree release opportunities on suitable stands in the project area.

Request for Resolution Meeting

36 C.F.R. § 219.57 outlines objection resolution meetings and states that “the reviewing officer must allow other interested persons to participate in such meetings.” We request notification be provided to AFRC of any such meetings to permit our participation.

Pursuant to 36 C.F.R. § 218.11, the Objector requests to meet with the reviewing officer to discuss the issues raised in this objection and potential resolutions. In the event multiple objections are filed to this decision, AFRC respectfully requests that the resolution meeting be held with all objectors present. AFRC believes that having all objectors together at one time, though perhaps making for a longer meeting, in the long run, will be a more expeditious process to either resolve appeal issues or move the process along. As you know, 36 C.F.R. § 218.11 gives the reviewing officer considerable discretion as to the form of resolution meetings. With that in mind, AFRC requests to participate to the maximum extent practicable and specifically requests to be able to comment on points made by other objectors in the course of the objection resolution meeting.

Thank you for your efforts on this Project and your consideration of this objection. AFRC looks forward to our initial resolution meeting. Please contact our representative, Corey Bingaman, at the address and phone number provided above, to arrange a date for the resolution meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "Travis Joseph". The signature is written in a cursive, flowing style.

Travis Joseph
President