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Organization:

Title:

Comments: Lynn Medley, District Planner

Willamette National Forest

Detroit Ranger District

HC 73 Box 320

Mill City, OR 97360

Re: Divide

Dear Lynn,

The following are my scoping comments on the above referenced project:

1. The project proposes to commercially harvest 16% of the Project Area, or 1661 acres out of 10,362. This is quite reasonable in terms of environmental impact, since only 15 acres or so will be regeneration harvested. The regen harvest acres should be those that will not benefit from thinning. On the map, the [ldquo]Commercial Treatment[rdquo] (purple areas) appear to occupy more than 16% of the Project Area. Please explain.
2. I am a big fan of sugar pine and I[rsquo]m pleased that it will be part of this project (100 acres). In the EA, please discuss the progress made in other areas for restoring this species so the reader will know that it is worthwhile here. What can be learned from earlier efforts in designing this aspect of the project here?
3. Dominant tree release should obviously favor the healthiest large trees, preferable in locations where this treatment will benefit wildlife, especially birds.
4. The patch or gap cuts should generally be outside of Riparian Reserves, especially the larger ones (i.e. acres or more). The 301 acres of unharvested skips should consist of prime forests of healthy trees which are not overcrowded, such that failing to thin will not result in fire prone forests with skinny, unusable snags.
5. Besides sugar pine, what other under-represented or climate change resistant conifers will be planted?
6. Girdling trees kills them. How will doing so on 15 acres increase forest health and vigor?
7. With respect to harvest systems, there appears to be a good balance between the three types available. Obviously, ground based methods should only be used on fairly flat terrain, and already disturbed areas should be used for skid trails and landings. Helicopter logging should only be done outside nesting periods for birds and be sensitive to recreational use of this area.
8. The [ldquo]fall and leave[rdquo] treatment of 42 acres in Riparian Reserves should not be at the expense of riparian reserves. In other words, a tree should not be felled to create stream structure or habitat if it is providing that benefit to terrestrial species, especially nesting habitat.
9. With respect to meadow restoration, the conifer removal/snag creation is fine but I don[rsquo]t like the removal of *Rosa pisocarpa*, which is a native species that benefits wildlife and has aesthetic qualities. What will take its place in providing similar positive features on the forest landscape?
10. The map does not show the 4 miles of new temporary roads or which 5 miles of temporary roads will be reconstructed. Are these the same roads that will later be closed/stored (7 miles) or decommissioned (3 miles)? The EA map should show all segments that will be created, reconstructed, closed and/or decommissioned. The attached map only shows roads to be decommissioned (always a positive feature in these projects, as the road

density needs to be reduced in these important watersheds).

11. With respect to road maintenance, I'm a big fan of culvert replacement. Don't overdo it in terms of removing "hazard trees" especially on roads used by the public. They often provide needed scenery.

12. With respect to hazard fuels treatments, which will occur on 954 acres, I much prefer machine piling to underburning. I am also pretty much against prescribed fire as described in the last bulleted item, although I recognize the need to meet the goals described here. I favor mechanical means of reducing fuel loads. I have been following efforts at Baskett Slough (a wildlife refuge) to restore the original oak savannah landscape, which has included the use of herbicides, cutting down trees/blackberry bushes, and prescribed fire. The latest round of prescribed fire has badly scorched the oak trees, even the larger ones. Time will tell whether or not they have survived.

13. Yes, please manage new and existing noxious weed populations, first and foremost by introducing them in the first place. Minimize the use of herbicides, especially in sensitive/riparian areas.

14. Please protect the quality recreational uses in the area in the design and implementation of this project.

This concludes my scoping comments on the "Divide" Project. I look forward to reading the EA.

Sincerely,

Karen Sjogren

[Address Redacted]