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Organization:

Title:

Comments:

Ranger King, you should be ashamed! A real, professional USFS line-officer would never have released the November 2025 pre-decisional EA to the public. It contains too many statements that are meant to deceive the public and are untrue. You fuel the public's lack of trust in the USFS.

The boys and girls who wrote the incomplete Divide EA call it a "draft" EA. It's not. It is a pre-decisional EA.

I strongly suggest you hire an unbiased fish biologist and hydrologist before you deal with so-called temporary roads again. I am still suprized that there are line-officers that still believe the agency's attempts to portray so-called temp roads as having less adverse environmental effects than system roads.

Ranger King, you will notice these comments include more information than usual because USFS employees at the Regional level will also be reading them.

Here is the undated Email letter I received.

"Dear Friends and Neighbors of the Detroit Ranger District,

The Detroit Ranger District of the Willamette National Forest has prepared a draft Environmental Assessment for the Divide project. It is now available for a 30-day public review and comment period.

The draft EA and supporting documents can be found on the Willamette National Forest's project website at <https://www.fs.usda.gov/r06/willamette/projects/56803>.

Please see the linked letter, signed by Michelle King, Detroit District Ranger, for information on the comment period and directions for submitting comments at <https://usfs-public.box.com/s/d0dae2mi8kput3aqbfmu75x7por13mn>.

Thank you for your interest in the management of the Willamette National Forest, Detroit Ranger District."

The pre-decisional EA at page4 states:

"Desired Condition: Maintain conditions in properly functioning portions of Riparian Reserves. In overstocked, conifer-dominant portions lacking structural and species diversity, proposed silvicultural tools would help accelerate desired vegetation characteristics needed to attain Aquatic Conservation Strategy Objectives (ACSOs) of the Northwest Forest Plan."

Comment: Perhaps a tree might be felled into the stream to introduce large wood. Silvicultural goals must never be applied to riparian areas. Logging equipment usually generates sediment which finds its way into the stream. This turbidity kills some aquatic life. Logging equipment must stay at least 100 feet away from the stream.

The pre-decisional EA at page 5 states:

"Wetland Habitat: At the landscape scale, wet and mesic habitats have been degraded over time due to conifer encroachment, and historic management actions such as road building, soil compaction from heavy equipment use, and suppression of historic American beaver populations. Consequently, the native plant and animal communities that depend on wet and mesic habitats, namely beavers, have become rare in the project area."

Comment: Solving a problem using the same actions that created the problem makes no sense. Keep away from these areas with heavy equipment.

The pre-decisional EA at page 8 states:

"Approximately 488 acres of Riparian Reserves would be commercially thinned to accelerate the attainment of ACSOs, in alignment with the FP (detailed description of the proposed actions are provided in Appendix E)."

#### Non-Commercial Treatments

Comment: A healthy ecosystem is much more important than volume isn't it? See comments for page4 text.

The pre-decisional EA at page 6 states:

"Agencies and Persons Consulted

The Forest Service consulted the following individuals, Federal, State, tribal, and local agencies during the development of this environmental assessment:

- \* Confederated Tribes of the Grand Ronde Community of Oregon
- \* Confederated Tribes of Siletz Indians
- \* Confederated Tribes of Warm Springs Reservation of Oregon
- \* National Marine Fisheries Service
- \* U.S. Fish and Wildlife Service
- \* Oregon State Historic Preservation Office
- \* Marion County
- \* Linn County
- \* City of Detroit

Comment: Several environmental groups should have been notified ... unless you chose groups that would support the Divide timber sale.

The pre-decisional EA at page 9 states:

"here are miscellaneous segments of low standard road identified as potential haul routes throughout the project area that would require reconstruction and road surface rehabilitation to support commercial haul. Timber harvest is expected to require the reconstruction of about 5.1 miles of existing temporary roads, and construction of about 3.5 miles of new temporary roads. Pre-haul maintenance on these existing temporary roads may include brushing, spot rock, ditch cleanout, culvert replacement, blading, hazard tree removal, and surface rock replacement."

Comment: All (emphasis added) temporary roads must be obliterated after use before winter. Ranger King, the fact that you plan to reconstruct 5.1 miles of existing temporary roads and close, rehabilitate, and seed with native seed shows me you don't understand what a temporary road is. Either obliterate it as you should have done years ago or construct a system road in the same location.

I expect you to obliterate the 3.5 miles of new temporary road after it is no longer needed. Your pre-decisional EA does not contain the words obliterate and obliteration. Please add them to the pre-decisional EA and state when they should be used.

The pre-decisional EA at page 9 states:

"Restoration treatments may include allowing fire from piles to creep into Rosa pisocarpa patches to manage their size."

Comment: Commercial logging does not restore the forest. See attachment #31.

"Road work would maintain user and public safety while meeting FP objectives. Further work will ensure proper

drainage, such as ditch and culvert drainage maintenance, and culvert replacement of approximately 30 culverts, or installation of drainage dips and water bars."

Comment: Ranger King, the fact you plan to waterbar a temporary road indicates you have no intention of obliterating your new so-called temporary roads as you should.

Please do not construct any so-called temporary roads for the proposed Divide timber sale. Use existing system roads or drop the timber sale.