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Comments: The Friends of Douglas-fir National Monument (FDFNM) hereby files an objection to the Detroit Ranger District's finding of no significant impact to the Divide Environmental Assessment (Project #56803). The finding of no significant impact should be withdrawn, the project modified in accord with the objections set forth here, and a legally valid environmental impact study put in place.

The Decision Notice and finding of no significant impact (DN) is conclusory and internally contradictory rather than being analytic. Instead of giving serious consideration to the comments to the Draft Environmental Assessment from the FDFNM and other groups, the DN merely repeats many of the incorrect or unsubstantiated assertions of the draft EA and reaches conclusions not supported by evidence.

The FDFNM objects because the DN uses inapplicable purposes and flawed reasoning to justify inappropriate actions. The inappropriate activities include

- *Active timber management in naturally regenerating areas of the project
- *Active timber management, including timber removal, in Riparian Reserves
- *Construction of new roads
- *Commercially style thinning rather than scientifically driven variable density retention

The objection is more fully set forth in the attached document.

To: Detroit Ranger District Ranger Michelle King, Willamette National Forest, Detroit District

Re: Draft Decision Notice and Finding of No Significant Impact and Environmental Assessment (EA) for the Divide Project (56803)

From: Milo Mecham, President, on behalf of the Friends of Douglas-fir National Monument

The Friends of Douglas-fir National Monument (FDFNM) hereby files an objection to the Detroit Ranger District's finding of no significant impact to the Divide Environmental Assessment (Project #56803). The finding of no significant impact should be withdrawn, the project modified in accord with the objections set forth here, and a legally valid environmental impact study put in place.

The finding of no significant impact (FONSI) is conclusory and internally contradictory rather than being analytic. Instead of giving serious consideration to the comments to the Draft Environmental Assessment from the FDFNM and other groups, the FONSI merely repeats many of the incorrect or unsubstantiated assertions of the draft EA and reaches conclusions not supported by evidence.

The FDFNM objects because the FONSI uses inapplicable purposes and flawed reasoning to justify inappropriate actions. The inappropriate activities include

- * Active timber management in naturally regenerating areas of the project
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Management of Naturally Regenerating Stands is, at base, solely for Timber

Production

Among the reasons given for the project are to (1) actively manage to promote growth diversity and structural complexity, (2) manage riparian reserves to promote desired vegetative characteristics, and (3) support biodiversity. There are no reasons to carry out any of these management activities in the Naturally Regenerating stands included in the project.

By definition, there is no reason to manage the naturally regenerating areas to have them develop naturally. The Divide FONSI attempts to rationalize including these naturally regenerating areas despite numerous objections by suggesting that these areas are crowded and do not have the characteristics of old-growth forests. FDFNM did not, and probably no other groups commenting during scoping, suggested preservation because these units were already at the old-growth stage or had characteristics equivalent to late seral forests. What comments about old growth forests were intended to convey is that naturally regenerating areas do not need management to move forward toward a late seral stage; like any other forest moving along the natural stages toward late seral development, no intervention management is necessary or appropriate.

These naturally regenerating stands are developing in accord with normal, natural conditions of the area. They have all the biodiversity and structural complexity that can be expected in the area. To the extent that proposed treatment is supposed to encourage the vegetative characteristics of any stand reflecting the naturally occurring vegetative characteristics of the area, these naturally regenerating stands have them already. Being reproductions of the biodiversity of the area, nothing more needs to be done to these stands.

The argument made by the FONSI for including Naturally Regenerating areas is that if these areas are not included in the list of areas to be managed, there will be no need to manage them. This is obviously weak reductionism that covers up the actual negative environmental impact of thinning in the naturally regenerating areas.

Fire, and the natural regeneration after a fire, is, as the FONSI acknowledges, a natural process that the forest has experienced and is capable of naturally managing on its own. Describing these stands as "overcrowded" is an aesthetic rather than a scientific description. In their meta study, Lindenmayer et. al, Ecological trade-offs of mechanical thinning in temperate forests, 2026, <https://www.sciencedirect.com/science/article/abs/pii/S000632072600056X> show that naturally regenerating forests grow through such stages, that it is a natural part of the process, and, because of their characteristics, including "crowding," actually have reduced fire danger, especially tree killing crown fires. The study also documents that there is significant growth in these stands; it is realized in the form of increased height, not increased diameter. Therefore, the best science demonstrates that treatment of these naturally regenerating stands is inappropriate.

The FONSI argument that excluding the Naturally Regenerating units would preclude improving the biodiversity needs for special habitats is inconsistent with the FONSI equivalency of natural and plantation stands. If the Naturally Regenerating areas are similar to the plantation areas, then why cannot plantation areas be treated to create early seral vegetation habitat and sugar pine habitat, or to meet the special needs of large herbivores, cavity nesters or pollinators? Since the characterizations of plantation areas demonstrates that they could be treated to create these environments, it becomes clear that the only reason to confine these treatments to Naturally Regenerating areas is to disguise the real reason: the FONSI insists on including these areas solely to meet the expected harvest numbers and achieve the needed favorable cost ratio.

Thus, it is clear that the proposed commercial thinning in these Naturally Regenerating stands actually

undermines or is contrary to the stated goals of the project, with the exception that these stands will produce much of the timber that the project needs. It is incorrect to conclude that there will be no significant impact to these Naturally Regenerating areas when commercial thinning is preferred over the primary asserted goals of the project. Indeed, inclusion of these areas is detrimental to their natural environmental conditions and will therefore have a significant negative environmental impact.

The only way this project can go forward under current law is to exclude the Naturally Regenerated stands from the Project area subject to any management.

Commercial Thinning in Riparian Reserves is not necessary to meet the Aquatic Conservation Strategy Objectives; it is Solely for Timber Production purposes

The FONSI dances its way around the determination to ignore the mandated size of Riparian Reserves by saying that a commercial thinning of the Riparian Reserves outside a variable riparian buffer will not adversely affect the Riparian Reserve and, besides, the non-commercial activities within the buffer may improve the stream conditions. This effectively replaces the Riparian Reserve with a much smaller buffer area. There is no discussion of the environmental effects of such an arbitrary and capricious modification of established rules. The District is simply saying that established Riparian Reserves are, in its new-found opinion, unnecessary.

The FONSI does, however, make it clear why it is including the no longer viable riparian reserves within the areas to be commercially thinned: it needs to get the timber out of these areas in order to meet its stated goals and to make the project economically viable. Page 7 of the FONSI admits: "Substituting non-commercial treatments (like girdling) in place of proposed commercial treatments would * * * be inconsistent with FP objectives to produce an economical yield of timber that is compatible with multiple use objectives**."

Included as an additional treatment within the Riparian Reserves are the activities, especially within the riparian buffers, that will actually assist in moving toward the aquatic conservation strategy objectives. These activities, such as falling into the streams, girdling, and similar activities are the only activities that should be done in the Riparian Reserves. Commercial thinning is not necessary to the Riparian Reserve treatments that will preserve or enhance the natural characters of the streams.

The project is not viable without violating established rules concerning protecting environmentally significant areas including rules concerning the protection of riparian areas, therefore the project is not viable and should not proceed. It is not appropriate to modify certain established rules and procedures, and develop an inappropriate finding of no significant impact to create an artificial viability when such viability does not actually exist.

Creating New Roads and Upgrading Existing Roads is Environmentally Harmful and should be Excluded from the Project

The FONSI discussion suggests that the project intends to create new gravel extraction locations within the project area in order to reduce costs during the construction, upgrading and repair of roads within the project area. The activities of generating road materials and then using this material on the roads in the project area, in and outside the actual harvest areas, is not discussed in terms of its environmental impact, except to conclude that it will have no long-term negative impact within the treated units. This is a serious omission, invalidating the findings of no significant impact.

In addition to the inadequate treatment of the environmental impact of the proposed road work, the FONSI makes directly contradictory statements concerning the treatment of the roads. On page 118 of

the FONSI it says: "The 2.0 miles of temporary roads constructed within Riparian Reserves for project activities will be effectively obliterated following harvest activities, and therefore will not impact the physical integrity of stream channels in the long-term." On page 142 it says: "Temporary roads will not be obliterated upon project completion. Obliteration involves re-contouring. Temporary roads are located in areas that require minimal disturbance, have minimal resource impacts, and decommissioning (ripping, subsoiling, seeding and blocking) will be sufficient to protect resources."

The Divide FONSI acknowledges that roads in the Forest have a negative environmental impact. Not only does the presence of roads increase the likelihood of fires in the Forest, but roads are the largest source of invasive species, and roads in general, and especially the construction of roads in riparian areas, are harmful to stream health and wetlands development. The only rationale for the finding of no significant impact is that these admittedly negative impacts will be minimal when considered in terms of the overall project area. It is illegitimate to dilute the extreme local effects of road work, especially the construction of new roads, by measuring it against larger areas that will not see any road work. Of course, in the overall perspective of the thousands of acres of the project area, an additional loss of forest for half a mile of roads is insignificant, but it will take hundreds of years for that half mile to return to its original conditions, perhaps it can never return if an invasive species gains entrance thanks to the road.

Road construction is environmentally harmful. The answer is simple; do not include any areas that are not reachable with existing roads and there is no need for new roads. Since road building is a major expense of any project, eliminating the new or rebuilt roads and eliminating the timber production to be generated in the areas to be reached by the new roads should not change the overall economic ratio, which needs to be recalculated in any event.

Variable Density Retention is Scientifically and Ecologically more Sound than Commercial Thinning

The FONSI acknowledges that naturally generating forests, especially stands where fire has played a role, develop in an ecologically diverse way. Different ages exist and different densities develop. If left alone, any stand, even a plantation, will evolve in that direction, see Lindenmayer et. al.

The FONSI justifies commercial thinning by suggesting that it is a shortcut toward the development of late seral stands, but this has no scientific support. Commercial thinning ignores the scientific findings about how to best achieve the goal of late seral development. No one can sustainably harvest a forest's development of its late seral stage. Any necessary thinning should be structured to reproduce the variable density of naturally evolving forests. The initial listed primary purpose of the Project is to promote diversity and natural development of the forest. Commercial thinning is an inappropriate substitute for the variable density retention treatment mirroring the natural processes.

Conclusions

The Friends of Douglas-fir National Monument support treatment of plantation stands through variable density retention (scientifically based thinning) as a means to overcome the ecologically damaging clearcutting and single species replanting characteristic of past Forest Service mismanagement. For that reason, the Friends did not simply oppose the Divide Project during the earlier request for comments prior to the FONSI. Instead, the Friends suggested reasonable modifications to the Project that would allow the Project to proceed in an environmentally sound manner.

Instead of giving serious consideration to the suggestions made by the Friends and other commentators, the District has developed a conclusory, rather than analytically sound, FONSI that makes it clear that,

under all the pseudo-analysis, the sole and driving rationale for the Project is timber production. No matter how well argued, any suggested change to the Project was rejected without legitimate analysis because any change would invalidate the alleged economic viability of the project.

It is the Friends' conclusion that this project is unsound and, for the reasons set forth here, and as set forth in earlier comments by the Friends and others, such as Oregon Wild. The Friends of Douglas-fir National Monument object to the Divide Project Findings of no Significant Impact.