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Comments: The Station Butte EA proposes commercial thinning on roughly 4,000 acres-including 1,058 acres of Riparian Reserves-based on a Finding of No Significant Impact. The agency's own analysis undercuts that finding.

Most critically, its IFTDSS modeling (Table 8) shows active crown-fire potential at the high end of fire behavior *increases* slightly after treatment (3% to 4%). This directly contradicts the EA's claim that thinning reduces fire risk and the project's reliance on that claim in its purpose and need.

Other gaps compound the problem. The riparian analysis concedes a ~30% drop in instream wood recruitment for decades in watersheds already "functioning at risk," yet calls the impact insignificant. The economic case rests on a thin 1.17 benefit-cost ratio (Table 7) with no sensitivity analysis. The carbon analysis uses a method the agency itself admits "likely overestimates carbon loss" and reflects a more intensive harvest than proposed.

I hike the Willamette National Forest often. This land is beloved to me and many others.

Before finalizing the decision, the agency should:

1. Reconcile the modeled increase in active crown-fire potential with its fire-risk claims, or state that fire-behavior improvement is not a core justification for this scale of harvest;
2. Provide sensitivity analysis on the log prices and costs behind the 1.17 ratio;
3. Recalculate carbon removal using a method matched to actual thinning intensity; and
4. Explain why treating only 8% of Riparian Reserves while reducing large-wood recruitment near fish-bearing streams adequately advances Aquatic Conservation Strategy objectives-or expand analysis and mitigation first.