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Comments: The Station Butte EA proposes commercial thinning across roughly 4,000 acres, including 1,058 acres of Riparian Reserves, based on a Finding of No Significant Impact, but the agency's own analysis contains gaps that undercut this conclusion. The most damaging is in the fire behavior section: the agency's own IFTDSS modeling (Table 8) shows that at the higher, most dangerous end of fire behavior, active crown fire potential in the project area actually increases slightly after treatment (from 3% to 4%), directly at odds with the EA's framing that thinning reduces fire risk and its reliance on this rationale as part of the stated purpose and need.

Other unresolved issues compound this. The riparian large-wood analysis concedes instream wood recruitment near thinned reaches will drop by about 30% for decades in watersheds already rated 'functioning at risk' for wood deficiency, yet concludes this is not significant (issue question 'Would thinning in Riparian Reserves be harmful to fish...'). The economic justification rests on a thin benefit-cost ratio of 1.17 (Table 7) with no sensitivity analysis disclosed for log price or cost assumptions. And the carbon analysis (issue question on biogenic carbon stores) is built on a methodology the agency itself admits 'likely overestimates carbon loss' and is 'more representative of a more intensive harvest' than what is proposed, undermining confidence in the no-significant-impact carbon finding.

The Willamette National Forest matters to me. I wildlife engagement, their habitat and personal recreation. What matters most: old growth and habitat for wildlife and watershed for clean water. If this goes through, pristine wildlife habitat and complex forest systems.

The agency should be asked to: (1) reconcile the modeled increase in active crown fire potential with its purpose-and-need claims about fire risk reduction, or clarify that fire behavior improvement is not a load-bearing justification for the scale of harvest; (2) provide a sensitivity analysis on log prices and costs underlying the 1.17 benefit-cost ratio before relying on economic benefit as justification; (3) recalculate the carbon removal estimate using a methodology proportional to the actual thinning intensity rather than the admittedly overstated upper-bound approach; and (4) explain why treating only 8% of total Riparian Reserve acreage while continuing to reduce large wood recruitment near fish-bearing streams is adequate to further Aquatic Conservation Strategy objectives, or expand the analysis and mitigation before finalizing the decision.