Comments on the QMS Project

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Introduction

With the announcement of this project, it was clear from the beginning, that, at 249 units, it was much too large for the public to meaningfully assess and comment on it.

It took a lot of map work just to become knowledgeable of the scope of the project. Only through a lengthy triage process, were we able to narrow down our list of units of most concern. Even at that, we ended up with 173 priority units of concern. We used three criteria:
1. units including or adjacent to streams;
2. units either adjacent to each other or adjacent to private industrial forest lands that, if cut, would have unacceptable cumulative affects;
3. units that impact recreational areas.

From that list, we had to narrow our list to a number that can be field-checked by our team of volunteers. As the only Forest Service public field trip showed, only five units could be visited in one day (one of which wasn't even a QMS unit. It was included to represent other actual QMS units that were too far to reach that day.) And that field trip was organized by people knowledgeable of the area. A great amount of map work, and even Google Earth 3D research didn't inform us of the actual conditions we found on the ground. While our field work revealed much valuable information, we were unable to do the thorough job we could have done if we hadn't had to spend so much time getting to know the lay of the land.

Undaunted, we set out to reach as many of our priority sites as possible during the season. Early in our efforts, we discovered that a number of those units were inaccessible, due to locked gates, roads blocked by landslides, bermed roads, missing roads, impassably rough or brushy roads and other impediments. We were told that FS employees themselves had to hike into such inaccessible units and told, in effect, to "take a hike". Units on inaccessible or no roads make a mockery of soliciting public input. It's not reasonable to expect unpaid volunteers to devote the required time and effort to field-check those inaccessible units.

Than came the pandemic. While it is possible to field check as individuals (social distancIng precludes checkers from traveling together and working together to and in the field), the inefficiency of going individually greatly reduced the number of units that could be checked in the time available.

Then came the fires. Much of the area, particularly most of the LSR portion, was closed entirely to entry for a month or more. Even essential FS employees were re-assigned to work the fires, resulting in vital work on the project being put on hold.

Then came the winter weather. During the race to visit as many units as possible, the rain and snow began. Many previously accessible units became inaccessible.

With a reasonably sized project, we could have coped with these many limitations.

General Comments

We were heartened by the few groves of old growth trees we discovered in the QMS project area that were not included in any units.

We managed to field-check 123 units.

We do not support the logging of *any* native forest either in late-successional or riparian reserves or in matrix lands. We *do* support restoration forestry in the LSR and the matrix.
By restoration forestry, we mean *scientifically sound* ecological restoration thinning in plantation stands to:
• accelerate the onset of late-successional characteristics;
• provide for other native tree species (both conifers and deciduous) that may already be on the site or could be planted with locally adapted stock; and
• mimic more typical conditions of natural forest stands by providing small openings, leaving thick clumps of trees and erasing the even-spacing of the plantation trees.
• facilitate the use of prescribed fire and managed fire.
• decommissioning unnecessary roads to protect water quality and improve habitat for native wildlife.

Not every plantation acre can be thinned, as some are not readily accessible by existing roads, are too steep, are too close to streams or should be left for other habitat and/or watershed values.

Necessary roads should be maintained and improved to minimize negative impacts on water quality and wildlife habitat

As there are so many plantations, the scientifically sound ecological restoration thinning operations can provide a flow of commercially valuable logs for local mills for some decades, providing logging, hauling and milling jobs. Watershed restoration activities, including road decommissioning and improvement will also be a significant source of jobs.

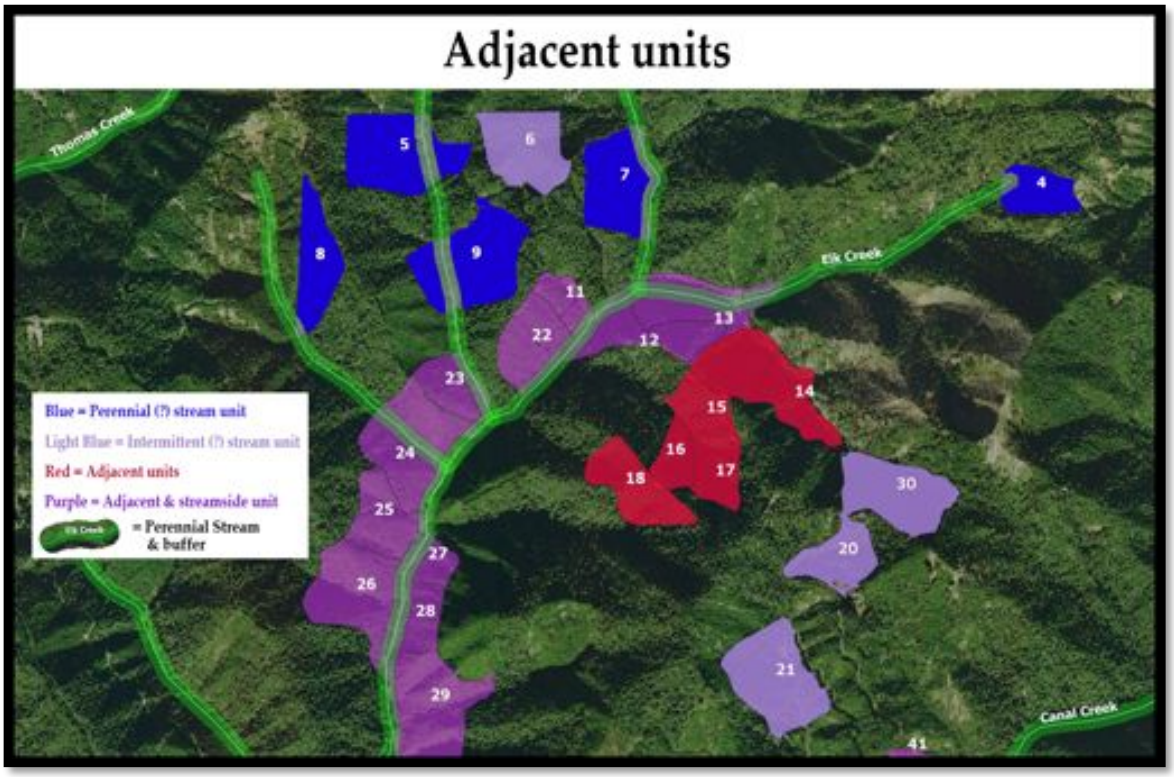
What follows are our responses to the draft EA given all of the limits described above.

We believe an EA is not adequate for a project of such size and impact.
A full EIS is required for the QMS project.

• Because of the large number of units in the project, it must be divided into at least ten projects of no more than 20 units each, separated by at least one year. This is necessary to allow wildlife to adjust and move out of the affected units into nearby undisturbed areas. It is also necessary for the public to have enough time to field check and comment meaningfully on the smaller, manageable projects.

General Unit Comments

• 88 Units adjacent to each other must be assigned to separate time-spaced projects to reduce the cumulative effect of cutting: Units (*11,12,13,14,15,16,17,18,22),* (23,24,25,26,27,28,29), (39,40), (42,43), (44,45), (50,51,52), (55,56,57), (58,59,60,62,63,64,65,66), (68,70,71,72), (75,76,77), (78,79), (100,101), (107,108), (116,117), (118,119), (122,123), (124,125), (133,134,135), (150,151,153,154), (185,186), (201,202), (213,214), (234,235), (243,244,246), (263,264), (266,267), (272,273,274,275), (280,281,282), (285,286).



We found 49 inaccessible units that should be dropped:

Reason	Unit #
Locked Gate	7.
Landslide	14, 15, 16, 17, 18, 101.
Bermed road	23,101, 182.
Missing/removed road	5, 6, 9, 64, 65, 109, 182,183, 185, 186, 189, 278.
Fallen trees across the road	67, 69, 72, 104, 105, 107, 109, 110, 120,125,129, 130, 134, 144, 145,147, 148, 149, 159, 162.
Too brushy	083, 084, 097, 098, 110, 117, 128.

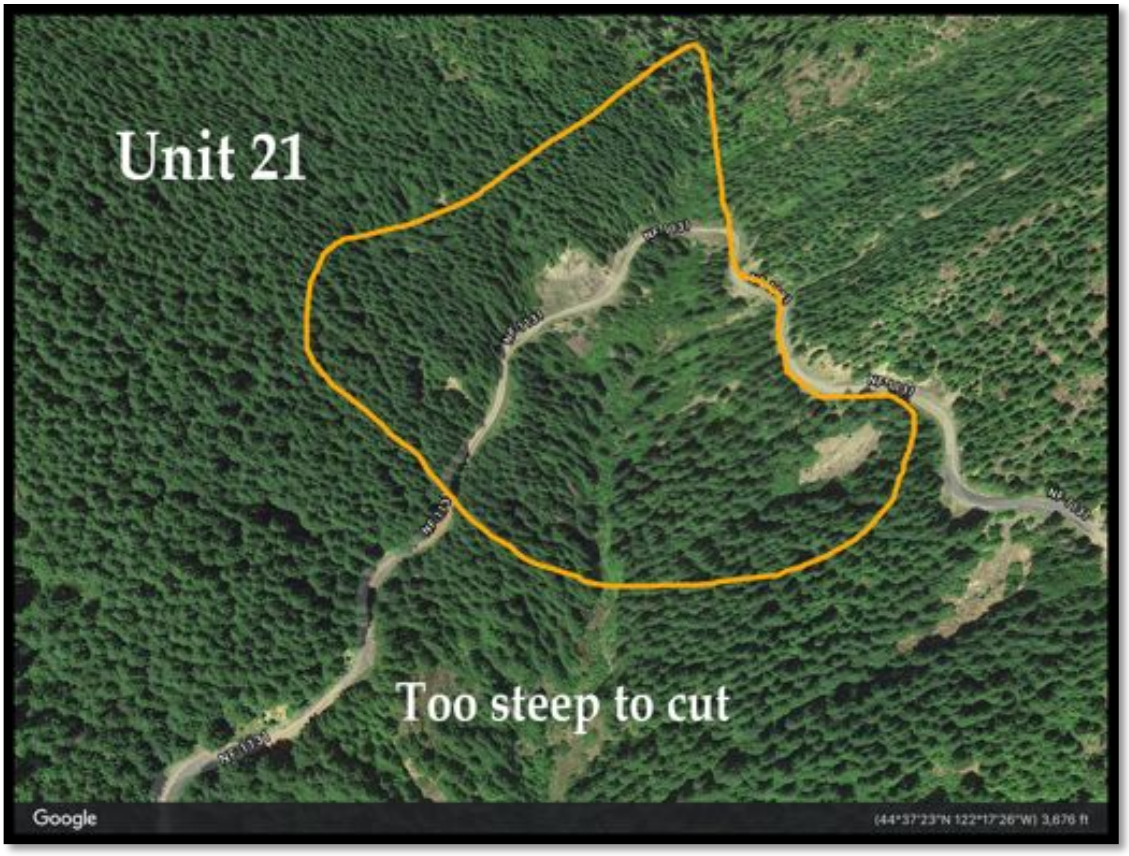
• 24 Units in the matrix adjacent to private property, either already clearcut or inevitably to be clearcut, must be dropped to prevent treatment from extending broadly across the landscape:

Units 45, 47, 48, 53, 56, 88, 213, 233, 234,235,247,249,263,264,266,267,269,280,285,287,288.280,281,282

• Many of the units we checked were so steep, they will require expensive helicopter logging. To cover that expense, contract buyers will pay for it from the receipts they earn from selling the logs. In effect, the trees will pay the expense of cutting them down.

All such steep units must be dropped.

Steep units we found:
11,13,21,22,23,24,25,26,32,33,34,41,42,47,53,56,57,59,60,61,87,88,90,91,99,109,111,112,118,119,126, 132,133,135,137,140,141,143,146,161,163,164,187,189,275.



• To meet the purpose and need in the LSR portion, restoration is prescribed to "release" the older, larger trees so that they can attain old growth characteristics. In many units, these such larger trees already exist. These trees must be marked and monitored by the on-site sale administrator so that they aren't inadvertently cut. Such restrictions must be noted in the bidding contract so that bidders can accurately assess the true value of the sale. All units must be so marked, monitored and described.

These units were found to have such trees:
7,11,21,22,28,29,34,41,57,58,59,60,61,62,63,68,71,91,106,112,116,126,131,135,137,142,145,166,173,200,240,247,264,272,273,275,285,288,291.

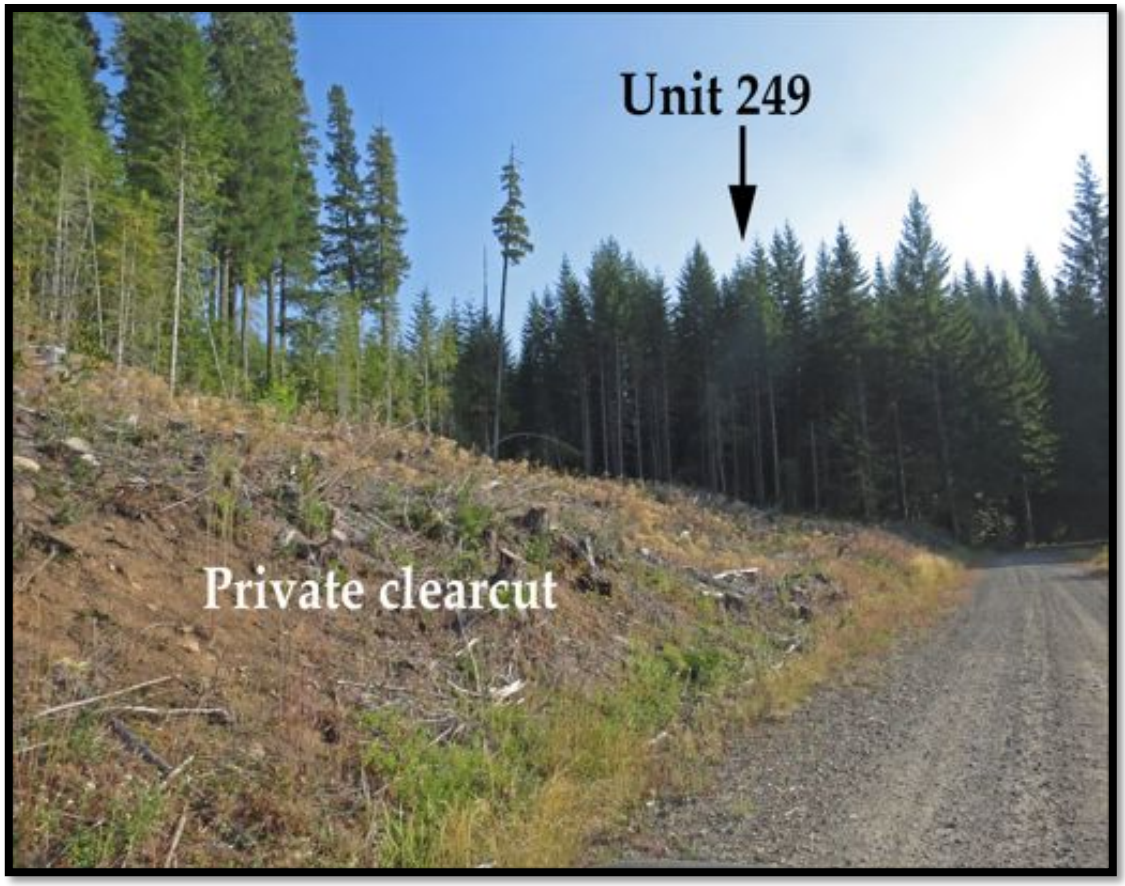
• Stream buffers are especially important as climate change gives us longer and more severe droughts. While field checking, we found a number of small streams still flowing in October. All units with streams of any size must be fully protected under the aquatic conservation strategy of the Northwest Forest Plan.

• Units affecting the recreation sites must be dropped because such sites are so uncommon in the area. Narrow corridors ("beauty strips") along trails are not acceptable. Units 142, 158.

• Units 176,177,189 and the west half of unit 137 are roadless and should remain uncut for eventual inclusion into the Middle Santiam Wilderness.

• Matrix units: Commercial logging, even commercial thinning will have a negative impact on the nearby administratively withdrawn areas and harm the area's potential to contribute to the area's local recreation economy in a positive, more sustainable way than commercial logging.

Units 147,258,259,263,264,266,267,269,272,273,274,275,276,278,280,281,282,285, 286,288. These units must be dropped.



Specific Unit Comments

- Unit 166: This large unit is full of old growth, contains two streams and is a known site for red tree voles, food source of the threatened Northern Spotted Owl. It must be dropped.

- Units 243,244,246 are adjacent and should all be dropped as a contiguous block of intact habitat.

Summary

- The QMS project is much too large to be addressed by a simple EA. An EIS is required because of its large impact.
- The QMS project is much too large for meaningful public comment.
- The QMS project must be separated into smaller projects of no more than 20 units each, each with their own EIS.
- The adjacent LSR units must be offered in separate projects, time-spaced to allow local wildlife move on.
- Existing large trees in LSR units are already on their way to old growth characteristics and must not be cut in the thinning process.
- Units that are inaccessible to the public due to landslides, locked gates, and impassible and no roads must be dropped.
- The Matrix units adjacent to private clearcuts must be dropped to minimize the cumulative affect across the broad landscape.
- All steep units that need helicopter logging must be dropped.

- All streams must be buffered