January 23, 2020

Joanie Schmidgall
Sweet Home District Planner
4431 Highway 20
Sweet Home, OR 97386

Re: Friends of Douglas-fir National Monument response to the December 18, 2019 Sweet Home Ranger District QMS Scoping Comments Request File 1950

The Friends of Douglas-fir National Monument must begin their response to the QMS scoping statement by objecting to unstated and unexamined elements of the letter. The Scoping Letter reflects numerous decisions that have been implicitly made prior to the invitation for involvement in the scoping of the project. The decisions preclude an objective analysis of whether the proposed project will actually achieve the listed purposes of the project.

A key element of this first level of concern is whether the first stated goal; to "contribute to a predictable, sustainable supply of forest products to help maintain the stability of local and regional economies and markets," is consistent with the existing designation and purpose of the LSR areas. This suggests that any project that includes both the Matrix areas and the LSR areas cannot adequately deal with the natural contradictions of the attempt to integrate contradictory designations and contradictory purposes, such as set forth in the stated purposes 1) and 2). The natural conclusion is that this project cannot succeed in its stated purposes. It should be cancelled and reformulated as two different projects – one to restore the LSR forests and another to produce a sustainable level of timber production. If the project is not cancelled then one of the alternatives that must be considered is a separation of the two components of the project with a completely separate detailed analysis of each component.

A second area of concern in the assumptions that go into this initial announcement of scoping is whether the proposed method of logging in the Matrix areas is actually going to achieve the stated goal: contribute to a predictable, sustainable supply of forest products to help maintain the stability of local and regional economies and markets. The local and regional economies have changed a great deal in recent years. Mills capable of handling large logs are rare. Introducing a few more large trees to the local and regional area will provide a temporary burst to those few mills and will create an unsustainable situation, harming the local and regional economy in the long run.

It is heartening that the District has recognized that traditional clearcutting is not sustainable and is contrary to the Multiple-Use Sustained Yield Act and the National Forest Management Act of 1976. Evidence concerning what is actually sustainable level of timber harvesting has also revealed omissions in the earlier definitions of sustainability. Rather than an unanalyzed assumption that the proposed method of logging, including shelterwood harvesting, is actually the best way to contribute to stable local and regional economies, the District needs to analyze the questions of 1) whether the proposed methods of logging will actually be sustainable and 2) whether the proposed project is actually the most efficacious way of contributing to a stable local and regional economy and complying with the multiple uses mandated for the District.

This gap in the basis for the assumptions that went into the development of this project is a major reason why the District's decision to do an EA, rather than an EIS is a serious error. The scope and diversity of the areas to be affected is another reason arguing for an EIS. Such a large project, with so many impacts and so many unjustified and unexamined assumptions demands the more extensive and thorough analysis of an EIS. The District will not be in compliance with applicable law if it attempts to short-cut the necessary analysis of the project.

Within the flawed decision to proceed with an EA under the existing project, the District needs to consider an alternative that includes a redefinition of the logging methods within the LSR and Matrix area to eliminate defacto (regeneration)

clear cutting. Commercial thinning where only 25 percent of the canopy cover, or even worse Shelterwood treatment where only 15% of the canopy is left undisturbed may maximize young tree growth, but does not support practices scientifically determined to be actually sustainable that will most effectively and actually contribute to a stable local and regional economy. This extreme thinning is not consistent with the latest scientific discoveries concerning nitrogen and carbon release from more heavily logged areas.

Past timber cutting practices have actually been unsustainable even though labeled as being sustainable. This has contributed to a boom and bust economy, where dependency on timber harvesting has been the source of long-term economic and social instability. An appropriate analysis – such as can best be done in an EIS – will consider the social and economic situation and the most appropriate way to incorporate the sustainable processing of timber into the local economy.

An appropriate analysis will consider the economic advantages of treating the Matrix area in a manner more closely aligned with the proposed treatment of the LSR area, that is, preservation of the older growth trees, and minimization of the unsightly heavy thinning or near-clearcutting, so as to preserve the other economic values of the area, especially for recreational use of the areas such as those around the popular Iron Mountain, the Middle Santiam and Menagerie Wildernesses and the Pyramids.

The Matrix area was originally designated as such because of the intersection of Forest Service land with private timber areas, and apparently an assumption that these areas would not provide as much recreational and cultural value as the LSR areas, because of the interstitial areas of private timber use. But actually this area is some of the most accessible areas within the QMS project area, and therefore can provide better access to the general public. These areas also provide some of the most attractive areas, from a multi-use perspective, in the QMS project area. The project areas in close proximity to the administratively withdrawn areas especially areas 250-290 are prime examples of areas where commercial logging, even commercial thinning will have a negative impact on the administratively withdrawn areas and harm the area's potential to contribute to the area's local economy in a positive, more sustainable way than commercial logging. Sustainable thinning, instead of maximizing the board feet production in these areas will preserve the multiple use value of the area, and more than mitigate for the clear cutting that has been the persistent treatment of the private areas within the Matrix area. Any analysis should carefully consider the other viable and more sustainable alternatives for use of this National Forest land.

In your transmittal letter you requested a list of other alternatives that should be considered. Even if the alternative approach of an EIS is (wrongfully) rejected, the analysis should consider the below listed alternatives:

1. Separate project consideration of Matrix area and LSR areas, thus avoiding the inherent contradiction between the first two listed purposes of the project.

2. Careful consideration of truly sustainable treatment of logging in LSR and Matrix areas, recognizing the greater value of limited logging treatment of the area to preserve the viability of other uses of the areas.

3. Specifying and clearly defining thinning so as to eliminate the possibility of logging with the essential effects of clear cutting in certain areas, including by limiting thinning to younger trees which are more easily processed by the remaining mills in the local area, and eliminating shelterwood and other types of commercial thinning that focus on dominant species regeneration through excessive canopy removal.

The following alternatives are related to the second and third bullets of the transmittal letter (additional information and specific potential effects). They are discussed more below.

4. Leaving roadbeds intact for use as trails is not decommissioning and will not address the problem of erosion. True decommissioning ends with the complete removal of the road, re-contouring the roadbed and re-planting with

appropriate naive plants. A more aggressive road policy should be instituted in the entire QMS area, with more than the currently proposed 14 miles of to roads being slated for decommissioned.

A plan for roads that are only to be closed must identify each road and a rationale stated for NOT decommissioning such roads. Such roads must be actually closed, unlike roads on the MVU map "closed" with inadequate gates, broken or simply left open. New units that require new, even temporary roads must be dropped.

5. The cumulative impact on streams and resident fish and wildlife of cutting adjacent units must be analyzed. The plan must be modified by timing the cutting over decades or dropping adjacent units so terrestrial wildlife populations have a reasonable amount of time to move to nearby suitable undisturbed habitat; and erosion from cutting and road construction and use does not overwhelm fish habitat with excessive, harmful sediment. Otherwise, such adjacent units must be dropped.
Important Information

Specific Process Comments:

At 200+ units, the QMS Project is much too large to be conducted within the timelines the NEPA process provides.

- Even under the relatively longer comment periods required by an EIS compared to comment periods for an EA, it is impossible for the public to meaningfully assess the impact of this project.

- The public field trip covered only four of the 200+ units (reduced, due to inclement weather, from the original five planned). It occurred on a cold, rainy, wintery day, making even basic understanding of a very small portion of the project problematic. The small area covered could not represent the variety of sites across the 7,900 acres proposed for treatment, much less the entire watershed. At this rate, many more field trips during more mild weather are required for the public to grasp the scope and impact of this project.

- Unit–by–unit study should wait until the end of the scoping period to account for scoping comments.

The QMS Project needs an EIS, not an EA, due to its large size

- This is a huge project with a huge impact. Even if it weren't a "catch-up" project and only a normally sized timber sale on a usual time line, its impact would be significant and would warrant an EIS.

- Even if an EA were to look as closely at the project as an EIS, the shorter comment periods are too short for such a large project. (We spent three months just evaluating the "pre"-scoping map and data).

- Even if many units are similar in character and warrant similar treatments, it takes longer than a 45 day comment period for the public to look over all 200+ units to come to that conclusion.

On the ground concerns:

Units of concern (see map on p.10 and table on p.11.)

- Stream-involved units must be protected with science-based buffers, without consideration of cost.
- Adjacent units must not end up, over time, as large single "units" with associated cumulative effects.
- Units within viewsheds of recreation areas, such as the Pyramids, must be dropped or appropriately modified.
- Units with trails (such as the Riggs Lake trail in Unit 142) must be dropped. A simple buffer (known as a "beauty strip") will not mitigate the effect of nearby thinning.
- Units in unroaded areas should be dropped.

Roads:
Closing and de-commissioning roads:

- The small number of road miles (14) proposed for de-commissioning is inadequate for protection of streams from erosion.
- The small number of road miles (18) proposed for closing is inadequate for protection of streams from erosion.
- How many miles of roads (both open and closed) exist within the project area?
- How many miles of roads (both open and closed) were evaluated on the ground for closure and/or de-commissioning?
- What criteria were used to determine recommendation of closure and/or de-commissioning?
- What is the timetable for proposed closure and/or de-commissioning?
- A short winter scoping period makes it un-realistic for the public to do a meaningful assessment of potential road closures and de-commissioning on such a widespread project area.
- Even our abbreviated ground survey in a small portion the project during the summer discovered that a number of roads closed on the MVU map were "closed" by gates that were not, in fact closed effectively, due to broken, missing and otherwise open gates. These roads need either sturdier (vandal-resistant) gates or need to be de-commissioned:

Keeping roads intact for fire fighting is a legitimate concern, especially in the matrix area where private inholders fear the spread of fire from public lands. Such roads are vulnerable to vandals who "open" closed roads with bolt cutters, winches and vehicle bumpers and need sturdy, vandal-resistant gates:

- What is the timetable to replace these inadequate gates?

- Roads in the LSR area are far from private inholdings and thus, escaped fire from a prescribed burn is not a threat to private properties and should be de-commissioned (removed, not just closed).

- De-commissioning many of these roads is especially important and appropriate because erosion from these un-maintained roads washes into tributaries of the currently pristine Quartzville Creek and other fish-bearing streams.

- Many unnecessary roads are not being maintained due to lack of funds. They should be de-commissioned (removed, not just closed).

- A thorough, on-the-ground survey of roads in the entire project is needed and would likely find many more miles of roads that can and need to be de-commissioned, without compromising fire fighting capabilities. Roads permanently closed by boulders should be decommissioned (removed, not just closed).

- Again, the huge project size makes assessment by the public of roads that need to be closed and/or de-commissioned impossible in the time available.

- From the scoping announcement: "*...Roads to be decommissioned are not currently drivable and would remain open to foot traffic ...*" These roads must be completely removed to prevent erosion into down slope streams.

- From the scoping announcement: " *... An additional 18 miles of road would be proposed for closing ...*" How will these decisions be made?

- Cost of de-commissioning can be paid for by K2 funds from the matrix sales.

- From the scoping announcement: " *... post-harvest activity-generated slash would be reduced using a variety of treatments such as grapple piling and burning on flatter ground, roadside grapple piling and burning, underburning, burning landing piles, chipping/mastication, firewood removal, and biomass utilization* …" Biomass should not be removed; it must remain to form new soil. Transportation for removal of biomass and subsequent burning generates unnecessarily greenhouse gasses and, thus, contributes to climate change.

Temporary roads:

- From the scoping announcement: " … *Constructing approximately 32 miles of temporary road access consisting of about 5 miles of new temporary roads and re-opening about 27 miles previously used, low standard, spur roads. Following this harvest entry, proposed temporary roads would be closed by berms, scarified and seeded with native seed …*" These temporary roads need to be de-commissioned (not just closed by berms, but completely removed to prevent erosion into down slope streams) after they are no longer needed.

- What is the timetable for de-commissioning these roads (ie. how long will they remain open after they are no longer needed?)

- From the scoping announcement: "*Proposed road work would include approximately 275 miles of forest road maintenance and reconstruction*" Please be more specific. Will these become newly open roads? Will they continue to be maintained? How will they be maintained to prevent erosion into down slope streams?

Fire

- Over 100 years of naïve, ill-conceived fire suppression has significantly contributed to the over-stocked, fire-prone, unhealthy forests we have today. The restoration goals of the QMS project are an attempt to correct this situation. As seen in the Whitewater fire, active fire fighting had only a (costly) minimal effect. It took (free) heavy rain and snow to put it out for good.

- If the QMS project is intended to restore the LSR forest to natural conditions, a new approach to fire as a natural component of the forest ecosystem is required, based on current science. Focusing on the wildland-urban interface should be a priority on the Sweet Home District. Such an interface does not exist on the QMS Project.

- There is no mention, much less discussion of, use of prescribed burning as part of restoration of any of the units. The only discussion relates to treatment of slash resulting from thinning.

- Burn plans for prescribed fires must be planned to effectively reduce over-stocking and excess slash and brush build-up without harming the soil. Such burns must be conducted by the USFS, not by a contractor.

Larger Consideration:

Climate Change

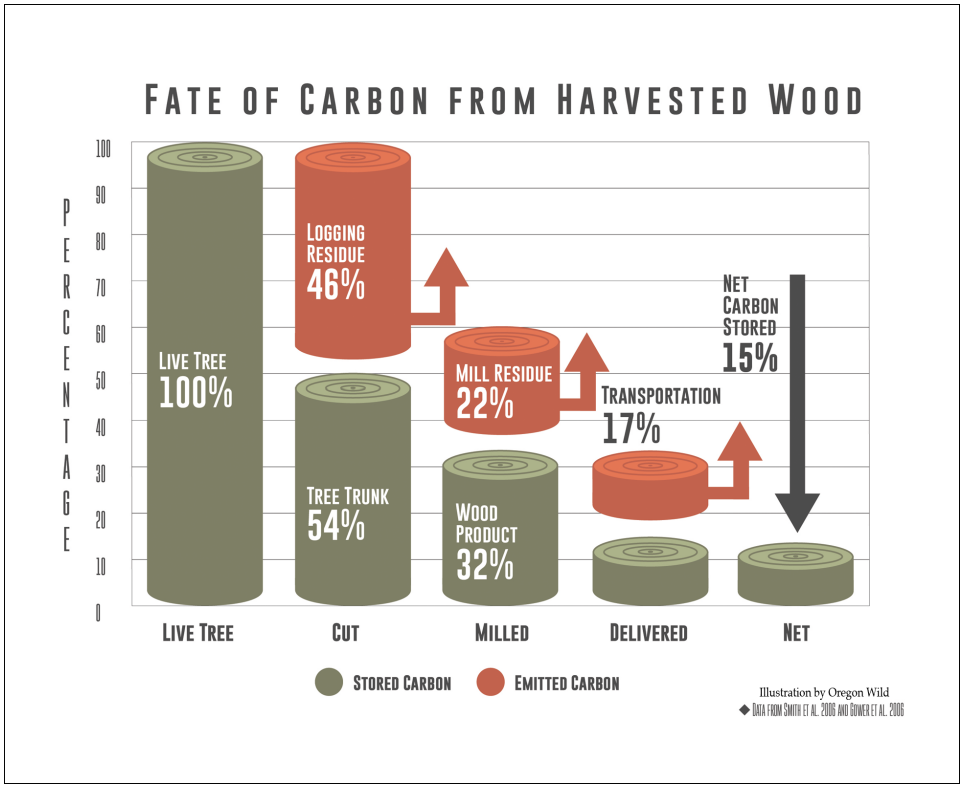
- Climate change is real, is human-caused and we can fix it.

- Natural Northwest forests can play a major role in mitigating climate change.
  See:
  https://www.spokanepublicradio.org/post/not-logging-some-northwest-forests-could-offset-climate-change-study-finds
  and:
  http://opb-imgserve-production.s3-website-us-west-2.amazonaws.com/original/buotte_eap.2039_accepted_1576697573797.pdf

- The QMS Project is large enough to make a meaningful contribution to climate change mitigation.

- Simply "plugging in" data from these units into a regional template will not result in useful information for on-the-ground planning. Unit plans need to describe the contribution each unit will make to carbon sequestration or add to atmospheric carbon.

- Claims that carbon can be significantly sequestered in timber products (houses, etc.) are incorrect. See this illustration:



Specific unit recommendations

- Unit 66 contains Minniece Point and numerous other unique outcroppings visible from FS 1155. It should be dropped for viewshed reasons. Cutting the unit as shown on the map would result in Minniece Point looking like an un-natural island in the sky.

- Unit 137: This unit lies directly adjacent to a long segment of a tributary of Swamp Creek, which is an important waterway that drains into the Wilderness. The forest directly south of this unit and along the same waterway is some of the most spectacular preserved old growth in this entire region, some of which is inside the Wilderness boundary and some of which is outside. Timber harvest should not be done on the southern two-thirds of unit 137, or on any area west of FR 648 to avoid harm to this ecosystem. The entire strip just east of the Wilderness boundary extending to the Chimney Peak Trail should be under permanent protection.

- Unit 166: Has documented red tree vole nests and should have been designated LSR. Buffering the nest will not provide adequate protection. The unit should be dropped.

- Unit 176, Units 177 and 189: These units are directly adjacent to the Middle Santiam Wilderness and to an important trail system as well as the main stem of Pyramid Creek. It would have significant impact on recreation in his area and should be dropped.

- Unit 147: This unit lies directly in the watershed of multiple important waterways that ultimately drain into the Wilderness. This unit should be withdrawn to protect water quality and riparian habitat.

- Unit 285: Has at least one documented red tree vole nest. Buffering the nest will not provide adequate protection. The unit should be dropped.

Summary

- The goal of restoration of the LSR portion of the QMS Project is laudable.

- Thinning plans in the LSR cannot "…contribute to a predictable, sustainable supply of forest products … ". The project must be separated into two projects, an LSR project whose purpose is restore the forest to an old growth forest capable of supporting old growth species and Matrix areas to provide a sustainable supply of timber. Plans for the Matrix areas must achieve real sustainability over the long term.

- Both projects must be broken up into much more manageable sizes. It is even questionable whether dividing the projects into the proposed seven sales (of numerous units) would make it small enough for the public to reasonably evaluate and comment on those sized sales.

- The huge size of the project demands much more thorough planning than can be done by a simple Environmental Assessment with its associated short comment periods.

- The standard NEPA process does not allow enough comment time for the public to meaningfully assess a large project such as the QMS Project, especially since much of the area is inaccessible during the winter.

- The impact of converting old clearcuts and current plantations to a natural forest is clearly significant and requires a complete Environmental Impact Statement. This should be a long-term project with a goal of recovery from decades of converting the forest from a natural forest to a crop of timber. We are only beginning to understand what has been lost in the process, not only plant and animal species, but entire ecological processes. It needs to be done right for the long term.

- The need to "catch up" from years of failing to generate desired timber volume cannot come at the cost of a quick-fix aiming to recover the forest from decades of applying outdated, harmful, traditional forest practices, originally implemented to liquidate "decadent" old growth forests.

- Stream buffers on each and every stream-associated unit need to be individually specified and clearly marked on the ground.

- All roads must be examined on the ground for closure and de-commissioning (removal of the roadbed, re-contouring the land to the original slope and planting with appropriate native plant species). Leaving the road closed for use as a trail is not "de-commissioning".

- Burn plans for prescribed fires must be planned and implemented to effectively reduce over-stocking and excess slash and brush build-up without harming the soil.
- Canopy cover on LSR units must be retained at 70%.

- Thinning must provide for natural species diversity and spacing, and work with each unit's aspect, slope, wind potential, and edge effect and must include adequate stream buffering.

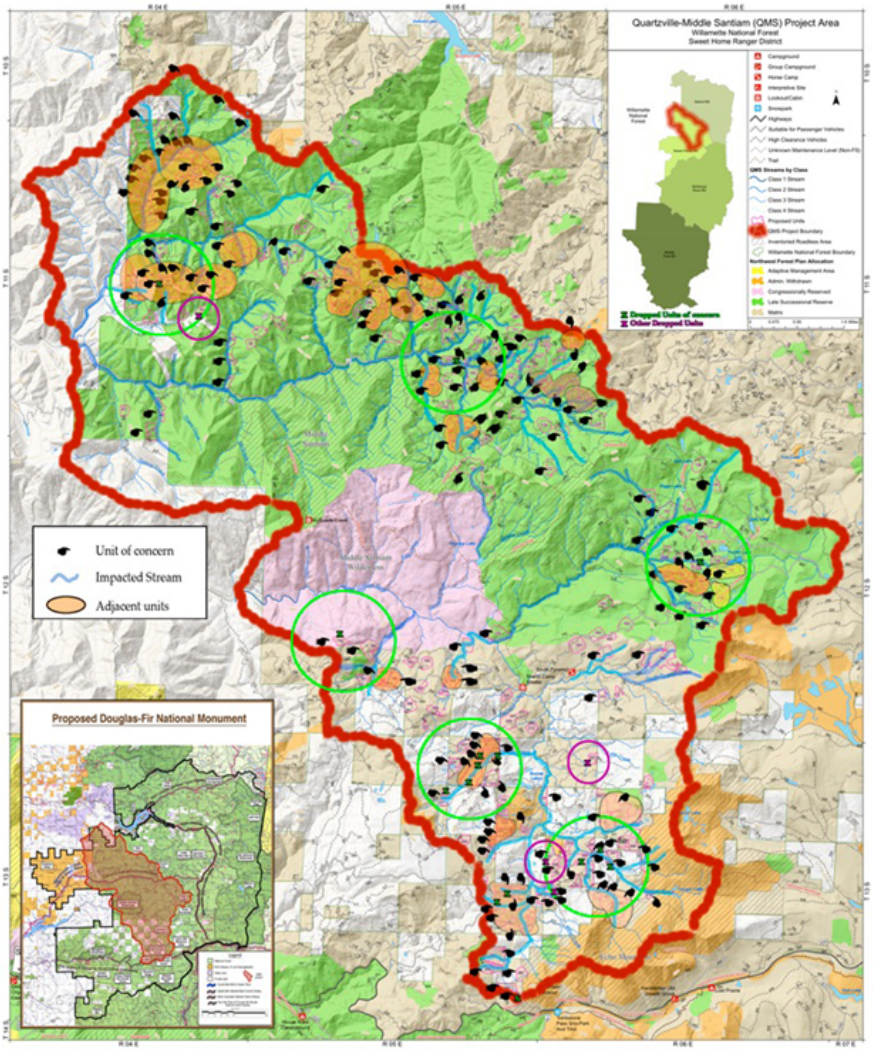
- Thinning must focus on releasing the trees with the most growth potential; it must not target the largest trees with the highest monetary value.
- Thinned trees and brush should not be removed, but should remain on the ground to decompose into new soil with all the original soil microbes.

- "Leave trees" must be unambiguously marked on the ground.

- Dropped or reduced acreage and associated board feet must not be made up elsewhere, on or beyond the QMS Project area.

- Where the cost of implementing our recommendations is prohibitive, units with such proposed actions and treatments should be dropped.

- Native forest stands must not be entered or treated. They know how to be a forest much more than we do and should be trusted to function naturally as they have done for millennia.



Key:	Unit #	Unit #	Unit #	Unit #	Unit #	Unit #	Unit #	Unit #	Unit #	Unit #
R & R	20	39	62	91	121	141	185	235	268	286
Stream	21	39	63	93	122	144	185	237	268	286
Adjacent	22	40	64	97	122	147	186	239	269	287
MULTIPLE CONCERNS	23	40	65	98	123	150	186	243	271	288
Drop these units	23	41	66	100	123	150	189	243	271	288
1	24	42	66	100	124	151	192	244	272	288
3	24	43	67	101	124	153	201	244	272	290
4	25	45	68	101	125	154	201	248	273	290
4	25	46	70	103	125	155	202	249	273	290
5	26	48	71	104	127	156	202	250	274	
7	26	49	72	105	128	157	213	250	274	
9	27	50	73	106	130	158	214	257	275	
11	27	51	75	107	131	159	214	258	275	
11	28	52	76	107	132	160	215	259	276	
12	28	55	77	108	133	161	215	263	277	
12	29	55	78	108	133	166	216	263	278	
13	29	56	79	110	134	166	218	264	280	
13	30	57	81	112	134	168	218	264	281	
14	32	58	83	114	135	173	220	266	281	
15	34	59	84	115	135	176	224	266	282	
16	36	59	85	116	137	177	225	267	282	
17	37	60	86	118	139	177	231	267	285	
18	38	61	88	119	140		234		285	