

January 26, 2020

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Re: Response to the December 18, 2019 Sweet Home Ranger District QMS Scoping
Comments Request File 1950

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.

The stated first goal of the proposed project is to “contribute to a predictable, sustainable supply of forest products to help maintain the stability of local and regional economies and markets.” The second goal is to “[i]mprove stand growth, diversity and structure in young, dense plantations within Late Successional Reserves in order to promote late-successional conditions.”

There are several problems with combining both of these goals. I fully support the appropriate level of thinning in LSR areas. But it is not at all clear that the appropriate level of thinning can take place within the stated primary goal of a project that seeks to contribute to a predictable, sustainable supply of forest products. Thinning should be scientifically based, not market based, and the thinning should be designed to improve the viability and diversity of late successional forests, not to develop a forest products market. Practices such as “shelterwood with reserve treatments” and “dominant tree release” are not consistent with allowing a true late successional forest to develop.

The proposed project is tremendously large. The combination of so many acres spread across such a large area, and across two different types of management areas suggests that the project cannot be properly analyzed in a single Environmental Analysis. The combination of two management areas clearly indicates that the project should be divided into two projects, each with a separate analysis. The massive scope of the project, along with the limited opportunity to provide meaningful responses to the scoping or to a single EA, meansthat the proposed project starts in a manner that fails to comply with the purpose and intent of several laws, including the Endangered Species Act, and the National Environmental Protection Act.

The broad scope of the project and the very limited opportunity to review and comment on the decisions that determine the nature of the project, let alone the project as it has been developed, let alone the plan to spread the actual contracting and harvesting across a span of years also indicates that a single EA will be inadequate; conditions swill change significantly during the interim between even the first EA an the first contract. To suggest that the initial analysis will be adequate for a contract that is not offered until years later is simply not credible.

The first stated goal of the request for comments contains a number of unsupported and questionable assumptions. The letter describes the goal as one of using logging to “contribute to a predictable, sustainable supply of forest products to help maintain the stability of local and regional economies and markets.” This assumes that the short term interests of a few logging

companies, many of whom may well be from outside the area, is the best means to maintain a stable economy. This also assumes an unsustainable influx of logging (to boost the local market for logs) is the best way to create a sustainable and stable local economy. The unit by unit analysis shows that there will be a range of ages of timber to be harvested. Some of the last large trees of the district will be harvested, along with many smaller trees. Is such a mixed harvest, one that will likely never be available again truly the greatest possible contribution to the local and regional economy or even the local and regional lumber market?

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 markets, 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 market while also complying with the multiple uses mandated for this and other National Forests. The unsustainable timber harvest practices of the past shows that returning to such practices, or partially modified but still unsustainable practices, will not really benefit the local and regional economy or the timber market. Instead of starting the analysis of the project with an unsustainable assumption that precludes a truly appropriate analysis, the project should begin with an analysis of what would actually most benefit the local and regional economy by looking at what would actually create a sustainable and stable local and regional economy.

This look at the mistaken or unexamined assumptions of the scoping letter leads to the conclusion that any EA that comes out of this project will be inadequate and full of errors. The District must instead conduct an Environmental Impact Analysis leading to a proper EIS that fully considers, without prejudice at least the following matters:

- What the actual local and regional market is in the twenty-first century, and how management of the district as a whole, the LSR and the Matrix areas can truly best contribute to a sustainable and stable situation.
- How to best integrate competing or contradictory purposes in a large project such as this, or whether alternative purposes that are not contradictory should be developed prior to initiating analysis.
- Whether a project covering so many acres, in different management areas, and across so many years can be certain of maintaining the protections of all applicable laws and policies and achieving the stated goals of the project.

Suggestion of Alternatives

Your letter asks “if there are alternative ways to better meet the purpose of the project.” As discussed above, it is difficult to suggest alternatives because the purpose of the project is internally inconsistent. The suggestions of alternatives to consider here is an attempt to advance your analysis, not a concession that there are not these contradictions. The alternatives proposed here are, in part, suggestions of ways to remove the contradictions. They may also be considered as attempts to operate within the stated purposes, setting aside the apparent contradictions.

Within these parameters, I urge that you consider the following alternatives:

1. that the multiple uses of the Forest be given more careful consideration. This would include more limited road building, application of thinning practices that are scientifically based to promote old growth forest replication rather than market based practices, and preservation of a balanced multiple use forest by limiting harvesting where other uses, by other species and by

humans for non-logging purposes are preserved. This last would protect viewsheds by limiting road building and any thinning greater than 30 percent removal.

2. That the LSR and Matrix areas be separated into two projects, and that each timber sale be subject to an individual EA as a part of the development of each sale.

3. That contemporary scientific understanding of the carbon sequestration of mature forests be incorporated into the planned logging contracts, so that the management of the Forest as a whole can contribute to a sustainable and stable local and regional economy.

4. Treatment of roads so as to minimize the immediate and long term negative impact of roads on watersheds and fish populations. This would include not building roads, road closures that are effective and long lasting, and actual decommissioning of roads.

5. Instituting a policy, especially in the Matrix area, of removing from the project, not simply delaying harvesting, of any unit that is adjacent to a pending sale or recent (within the last ten years) harvest on public or private lands.

6. The QMS project should be considered as an opportunity to turn the National Forests into the most productive form of carbon sequestration as a way to ameliorate the effects of climate change. To do this the actual effects of logging and slash burning must be analyzed, and the positive impact that appropriate forest management with the intent of using the forests as a means to protect against climate change should be incorporated into the analysis and given appropriate weight.

Information about the project area

Your letter of December 18 asks for information about the project that I would like the Forest Service to consider. I have included some of those things in the above discussion, such as contemporary scientific understanding about the contribution that mature forests make to carbon sequestration, and the detrimental effects of logging on that carbon sequestration contribution.

Here again, it is difficult to provide details about some aspects of concern in the description of the project, because the details about planning and development of the project are absent. For example I am very concerned about the roads. In the past my experience with roads in the Forest Service lands is that roads that are supposedly closed or decommissioned are not actually closed in a way that prevents later use, and that roads that are closed or that are decommissioned are actually left to erode and damage the adjacent environment. I am not clear on a number of questions:

- 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?

I am limited in my ability to make a contribution elucidating my concerns as you ask because I lack an answer to these questions. Within that limit, however, I can offer the following concerns:

- 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.
- Roads that are marked as closed on the current District maps are not actually closed, because the gates or barriers that have been used to "close" the roads are inadequate and easily broken or evaded.
- The number of temporary roads must be limited, and temporary roads must be actually decommissioned, not just "closed" and allowed to erode.

I am also concerned about the negative impact of the proposed logging on streams and other uses of the Forest. Inappropriate logging, with improper or limited buffers, such as are commonly used in other logged areas and on what are called "seasonal" or intermittent feeder streams have a negative impact on fish. Other species, including threatened or endangered species are impacted by logging in the forest, and not just in areas where they have been found, because none of these species limit themselves to one area or one tree. Human use is negatively impacted by logging as well, even if cosmetic protections are offered.

- 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.
- Simple buffers or "beauty strips" will not mitigate the effect of nearby thinning in any unit with an existing or planned trail. Units with trails should be dropped, or modified to eliminate areas around the trails.
- Units in areas that currently are not accessible by existing roads should be dropped.

I am concerned about fire before, during and after the project, and about how improper use of the biomass may contribute to deterioration of the forest.

- 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.
- 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.

Unit analysis

There are multiple units in the project area that should be removed from the scope before any announcement of a sale. These units pose special problems because they will be adjacent to other units that are scheduled to be logged during the same time frame, or because they are inseparable from important fish bearing watersheds, or because they contain important endangered species, or because any logging in that unit will adversely affect the established recreational use of the Forest. The most important examples of the troublesome units would include: Units 66, 137, 147, 166, 176, 177, 189, 250, 251, 257, 258, 259, 263, 264, 266, 267, 268, 269, 271, 272, 273, 274, 275, 276, 277, 278, 280, 281, 282, 286, 287, 288, and 290.

Examples of the limitations of these units, and why they should be excluded from consideration would be:

- 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.

Thank you for the opportunity to comment on the proposed project at this early level. Please do not assume that I am opposed to any or all logging in the District. We need logs to sustain our economy and lifestyle. We need proper forest management to correct the abuses of improper forest management in the past and to help deal with the human misuse of the environment. The QMS project has the potential to do all this. Unfortunately the QMS project also has the potential to make problems worse: to weaken the long-term stability of the economy and exacerbate environmental deterioration. As proposed it seems more likely that the QMS project will be adverse to the potential good that it could further, and harmful to environment. The District should move more slowly. It should open the process to more public comment, with greater opportunity for interested parties on all sides to participate and shape the project before it is defined and opportunities are lost.

Very Truly Yours,

Milo Mecham

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