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Nicola Swanson, District Ranger
Sweet Home Ranger District
4432 Highway 20
Sweet Home, OR 97386



By CARA: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=57351>
By email: joan.schmidgall@usda.gov

Re: Quartzville-Middle Santiam (QMS) Project

Please consider the following comments submitted on behalf of Cascadia Wildlands, Oregon Wild, and Willamette Riverkeeper regarding the Final Environmental Assessment and Draft Decision Notice/Finding of No Significant Impact (FONSI) for the Quartzville-Middle Santiam (QMS) Project, available at <https://www.fs.usda.gov/project/?project=57351&exp=overview>.

Project Description

The QMS project area consists of 89,000 acres within the Quartzville Creek-Green Peter Lake and Headwaters Middle Santiam River watersheds. Per the Forest Service's selection of Alternative 4, the QMS project will harvest 50 to 60 million board feet of timber from 7,320 acres of previously-managed plantation stands ranging from 30 to 60 years in age by commercial treatment, including thinning, gap creation, dominant tree release and skips. Alternative 4 eliminates treatment in stands greater than 80 years old and all shelterwood with reserve treatments. Alternative 4 also excludes eight units (43, 166, 172, 232, 240, 241, 242 and 243) from the project entirely.

To access project units, the agency will construct 4 miles of new temporary roads and re-open 27 miles of previously used, existing non-system roads. Additionally, road reconstruction or maintenance will take place on approximately 287 miles of forest roads and include the replacement of approximately 1,200 culverts. About 14 miles of Forest Service roads will be decommissioned and removed from the system while an additional 19 miles of roads are proposed for closure and will be placed in storage.

Collaborative Process and Support for Chosen Alternative 4

The Forest Service's decision to implement Alternative 4 effectively responds to an outpouring of public input. A wide range of informed and engaged members of the public, including those representing our organizations, heavily engaged with the Forest Service throughout the development of this project. We were both baffled and quite disappointed with the agency's original draft proposal, which included regeneration logging in stands up to 150 years old. It is widely understood that logging older stands negatively impacts soil, water, weeds, carbon, and dead wood recruitment. Through written comments and numerous field-checking reports, which we incorporate here by reference, we expressed our concerns to agency staff and identified which aspects of project were particularly problematic from an ecological, conservation or recreation perspective. Our groups urged the Forest Service to exclude trees over 80 years of age, eliminate 'Shelterwood with Reserves' treatment, and remove several specific units

with old forest characteristics from the project. While our groups have long supported careful restoration work on the Willamette National Forest, the impacts of logging in older stands far outweigh the benefits.

We are thus very pleased that the Forest Service duly considered the input of our groups and numerous others and ultimately chose to move forward with Alternative 4. This alternative will be significantly less impactful on the surrounding environment and its inhabitants than other alternatives considered by the agency. Alternative 4 preserves important wildlife habitat and reduces impacts to imperiled species including owls, bats, and butterflies. It supports forest values such as water quality protection, carbon sequestration and storage, resilience to wildfire, cultural significance, and public enjoyment. This alternative also aligns with President Biden's executive order declaring a policy to conserve mature and old-growth forests on federal land and to manage forests to retain and enhance carbon storage. Issued in April 2022, agencies can and should implement policies advanced by the executive order immediately.¹ Further, it is in line with our strong support for reducing roads in use and performing maintenance on existing roads to reduce their ongoing impacts to the environment. We strongly encourage all agency actions that result in a reduction of road miles in these already-impacted watersheds.

The development of the QMS project exemplifies a collaborative approach that fulfills NEPA requirements, prioritizes ecological values, and meaningfully incorporates public input, all while meeting the Forest Service's economic needs. The Forest Service should continue to utilize this collaborative approach in the development of other projects moving forward.

Our groups request that the Forest Service notify us of any objections to this proposal and provide us with an opportunity to participate in discussions to resolve said objections.

Sincerely,

Grace Brahler
Cascadia Wildlands
grace@casewild.org

Doug Heiken
Oregon Wild
dh@oregonwild.org

Lindsey Hutchison
Willamette Riverkeeper
lindsey@willametteriverkeeper.org

¹ Biden, Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies. Presidential Actions, April 22, 2022. Available at <https://www.whitehouse.gov/briefing-room/presidential-actions/2022/04/22/executive-order-on-strengthening-the-nations-forests-communities-and-local-economies/>.