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Organization:

Title:

Comments:

I have had the privilege of exploring many areas of the QMS timber sale this past year and have several observations and questions regarding this project. This QMS project is a very large timber project and I hope the additional eyes from citizens like me is appreciated.

I have hiked the following units of the Quartzville-Middle Santiam (QMS) timber sale.

Matrix

Units 272, 273,274, 275

241, 242, 243

LSR

Units 108, 114, 116, 117, 126 and points in-between.

My biggest concern involves unit 243 in the Matrix.

The complexity of this unit was a delight to experience, knowing that with diversity comes a healthy forest . This unit has a variety of tree ages with a forest floor of downed wood, deep hummus and a variety of understory plants (Nootka rose, sword fern, snowberry, rhododendron, vine maple , huckleberry ,coral root orchid, to name a few). The tress were primarily Douglas fir with some Silver fir many 34" to 42" dbh and one tree along the western boundary was 55" dbh .

Wildlife sightings were elk and deer, and pileated woodpecker holes in mature trees were found throughout this unit.

Water features were abundant, with active flowing streams in late July, boggy pools and abundant water vegetation.

Even though I couldn't find it referenced in the EU, I found a QMS Riparian buffer map (Forest Service map) indicating that a very large section of the unit 243 will be or should be buffered because of the Tommy Creek tributaries. My concern is,

according to the EA QMS Drainage map fig 1 pg 2 there is no recognition that there is any water at all in unit 243. But I have been hiking there twice and there is multiple water sources and a large part of this unit is or should be in riparian reserve (see attachment #1,2,3).

Map #3 is difficult to interrupt because the legend doesn't describe the bright pink or brown. The lighter pink may be a no cut zone, but it is not clear.

Project Purpose and Need #3 states that our forests have less variety in forest structure and lower ecological diversity than the past because of the management style of the past 30 years. Unit 243 (age 152 yo based on Appendix B Year of Origin) has age class variation, diversity, understory plants, water, and observed animal habitat. Unit 243 is also part of an older forest connectivity that connects with forest land outside of the QMS boundary. This should not be disturbed per the purpose of the QMS project is "designed to preserve connectivity between older forest stands". Unit 243 does this! Unit 243 is a rare parcel because it borders a dispersed recreation primitive, non motorized area (see attachment #4)

Questions

1) None of the roads in the 243 unit area are planned for decommission which leads me to believe that this beautiful and water rich area is still being considered for more logging in future sales. Is this possible?

2) When I look at the Story map I question why units 32 and 33 in the LSR are so small, yet connected to intermediate forest areas and are probably overstocked like most everything else in the LSR. There are roads to it but very far off the beaten path and these roads are not being decommissioned. So FS has some plan for this area. Why not harvest more timber in these remote areas and leave unit 243 alone given its uniqueness?

3) According to EA Northwest Forest Plan (fig 6, pg 9) unit 243 is allocated for shelterwood with reserves but no indication of riparian reserves on the map.

Why? The riparian reserves areas was very difficult to parse out. I am requesting better maps in the final EA.

4) Per EA the forest service is being less aggressive with units 32 and 33 , leaving 55% and 48% CC and more TPA in a light green shaded area than an old growth unit like 243 with only 36 % CC and 39% TPA. Please explain.

5) According to the QMS Drainage map fig 1 pg 2 there is no recognition that there is any water at all in unit 243, So why isn't water features represented on this map?

6) "Production of timber is an important objective for Matrix land, but these lands also provide habitat for a variety of organisms associated with both late successional and younger forests (NWFP B-1)." In recognition of this EU statement, Unit 243 should be valued for its habitat, water features, pleated woodpecker, flora and fauna and climate mitigation. Why isn't it?

7) I am concerned that under Alternative 2 that 115 acres is going to provide a whopping 6,750. mbf which means that the plan is to take lots of large trees.

Do the skip acres represent the acreage for riparian reserves?

Explain, why such a severe treatment under Alternative #2?

8) Chapter 3 pg 62 regarding unit 243 "Those residual trees not used for snag and downed wood creation would be retained throughout the rotation. Retaining these trees "...over the long term will create more structurally and compositionally diverse forest ecosystems that will offer society a broader array of ecosystem services and management options" (Gustafsson et al., 2012)."

There is already a lot of downed wood, the complex structures are there.!!!

Please explain why the forest service is trying to do a better job of creating a forest than the forest itself (attachment # 5)

Conclusion

I am asking the forest service to convert to Alternative #4 for the whole project but especially unit 243. This unit is well on its way to becoming an old growth stand with complex multiple water ways (that should be in Riparian reserve), wildlife habitat corridors, large trees, and snags.

Treatment acres for Alternative #4 is only 450 less than the other 2 Alternatives, which is a small price for the big benefit of leaving unit 243 alone.

I can support thinning younger, overstocked plantations on previously logged forests to address Purpose and Needs #1.

There is no justification of logging older trees in this unit on public lands.

I fear that unit 243 has irresistible characteristics for mills that cater to bigger trees but eventually the last of the big trees will disappear and mill adaption will have to take place . So let's start now! Private lands can supply that need, don't let public lands be the source of big tress. They benefit the greater community by staying in forest, and contributing to a stable climate for our local and regional communities. There is plenty of trees in the overstocked LSR for the mills and timber markets. According to the Oregon Forest Resource Group, Linn County accounts for 7% of the jobs in the Forest sector. Whereas 93% of the Linn County is relying on smart sustainable forest practices to contribute to a stable climate pattern which in turn will stabilize our economy.

I plan to return to this unit with friends for photography, and flora observations.

I have a friend who is knowable of aquatic species and we are planning an exploration trip next summer. It is large enough to make for great day trips, with new explorations each visit.

Maps as attachments:

QMS Riparian Reserve Map featuring Tommy Creeks

Story map of unit 243 showing areas of known flowing streams.

Boggy area in 243 with vegetation

Story map of connectivity of unit 243 to other mature forest areas

Downed logs in unit 243

This map shows all of 243 in shelterwood (makes for confusion when showing whole unit in shelterwood)

I am looking forward to your response to my questions.