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Organization:

Title:

Comments: Public Comments on QMS Timber Sale

To: Sweet Home Ranger District, Willamette National Forest From: Nadene LeCheminant, Salem, Oregon

Subject: Public Comments on Quartzville-Middle Santiam Timber Sale

December 10, 2021

Dear Ms. Schmidgall,

I moved to Oregon 15 years ago, drawn by its physical beauty. The Cascade Mountains and Coast Range are the primary reason I chose to live in Salem. I was dismayed to learn about the proposed Quartzville-Middle Santiam project being planned in the Willamette National Forest. I have hiked many trails in this forest and have always been disheartened at the extent of logging.

I am not opposed to all aspects of the QMS project, such as logging some dense stands of younger trees. What is disturbing is the immense scale of the project, and especially its inclusion of mature and old growth trees. This project is also uncomfortably close to a protected wilderness area and would seriously degrade the values of some of the most scenic locations in the Oregon Cascades.

I urge a modified Alternative 4, and have listed my primary concerns and recommendations below.

RECREATIONAL AND SCENIC VALUES

Recreational and scenic values, vital to our local economies, will be undermined by Alternative 2.

Many Oregon residents have chosen to live here because of the state's exceptional scenic and recreational values, and millions of tourists are drawn here for the same reason. Indeed, these values are a primary driver of the Oregon economy, which is shifting from extraction-based sectors, such as timber, to the recreation sector. According to the U.S. Bureau of Economic Analysis (ORSA - Oregon.pdf), outdoor recreation in Oregon adds \$5.3 billion to the economy and provides 69,624 jobs, giving it greater economic importance than timber production.

The EA's economic analysis undervalues the scenic and recreational values in the QMS project area. If the analysis included the total values of recreation and tourism to local communities, including direct effect jobs, indirect effect jobs and induced effect jobs, the economic benefits may well exceed timber revenues, as they do for the state. These relevant figures have not been included in the EA. Recreational visitors currently generate \$138 million in revenues for Linn County each year, as they dine in restaurants, stay in inns and lodges, make retail purchases from businesses, buy gas, hire outfitters and guides, and enjoy organized outdoor events and entertainment. The towns adjacent to the Willamette National Forest see significant economic benefits, and these will most likely grow in the future. There is increasing interest in recreation and outdoor activities on the Sweet Home Ranger District since this area offers numerous low-elevation sites that have year-round accessibility.

The EA claims that proposed logging and thinning treatments will actually contribute to a "positive recreation experience." As an avid hiker, I can attest that I have never yet seen a logging project that contributed to a positive recreation experience. I hike regularly with individuals and groups, and I have never heard a single hiker express enthusiasm for any kind of forest logging. In fact, I see the opposite. For the EA to say that a timber

project, with its exposed stumps, logging slash, skid trails, new road cuts, barren slopes and moonscape ambience, would increase recreational value is absurd, and to claim that "economic benefits generated by forest visitors [hellip] will not be affected by the QMS project" is simply incorrect. Logging, even so-called "thinning," generally creates scenes of devastation that last for many years.

The EA states that the "QMS project area is a popular destination for both developed and dispersed recreation activities." The Quartzville Back Country Byway, a 50-mile-long route from Highway 20 to Highway 22 that runs through the project area, is especially popular for scenic drives during the summer and autumn. Spectacular wildflower hikes draw visitors from around the region and world. (I have met European tourists at the summit of Iron Mountain.) Hikers enjoy more than 72 miles of trails, and there is growing interest in trail running and mountain biking events. Annual organized recreation events include activities within the proposed project area.

Linn County receives approximately 856,000 recreational visitors each year. These include campers, hikers, mountain bikers, trail runners, picnickers, hunters, anglers, swimmers, horse riders, photographers and families out for a scenic drive. If the QMS project goes forward as planned, its impacts to scenery and recreational values will undermine the outdoor experience of these visitors.

The EA claims that the environmental consequences of Alternative 2 would be minimal, with short-term, minor impacts of noise, increased truck traffic and localized road closures[mdash]in other words, temporary inconvenience for recreational visitors. The EA states, "There will be no long term negative effects. Benefits to the Quartzville Byway and other forest roads include less dense forest stands providing increased depth of view into the surrounding forest [hellip]" As an avid user of the Willamette National Forest, I can attest that I don't know a single user who enjoys looking at logging in any form. Views from both low-elevation trails and mountain summits are scarred by unnatural squares of recent brown clear cuts and monocrop plantations that have replaced natural forests. This degraded experience is of far greater significance than the minor, temporary disruption of truck traffic and road closures.

In fact, many hikers and campers I know travel long distances to recreate in other forests, where scenic values have been more protected. They spend tourist dollars elsewhere, reveling in the majesty of mature and old growth forests.

The balance between extractive industries and the recreation sector is difficult to achieve, I know, but Oregon's future does not lie in continuing to designate our forests as economic sacrifice zones devoted to timber production. Recreational values will become increasingly important as we move into the future, and those values must be protected in order to protect our economy. Tourism and recreational values are degraded when forests are thinned and clear cut on the massive scale that is occurring in the Cascade Mountains right now, and especially when mature and old growth forests are logged. Older forests form the iconic heart of the outdoor experience for Oregonians and recreational visitors.

The EA fails to describe how natural forests contribute to the stability and economic health of local and regional economies. It fails to describe the economic disadvantages of degrading Oregon's scenic values. Timber sales have short-term advantages and long-term negative consequences. A balanced economic analysis in the EA would likely show that the economic value of the local recreation sector exceeds the economic value of local timber production, and that this trend is likely to increase in the future[mdash]if forest habitat and scenery are protected.

In addition, we have already seen extensive post-fire salvage logging in our area. A project of this immense size cannot be ecologically justified in the aftermath of such heavy recent logging.

Alternative 4, which is less environmentally damaging, would still provide 50-60 million board feet of timber, supporting the economy in Linn County. This alternative would also provide a steady supply of wood, and should

be the preferred alternative.

OTHER ECONOMIC CONCERNS

The local timber supply has been greatly increased by post-fire salvage logging. The EA's economic analysis should document economic benefits already received from recent salvage logging. One timber company executive recently announced record profits. His profits have reached levels never experienced in his company's history, which traces its roots to the early 1900s. He also mentioned that the glut of post-fire salvage logs is so immense that he is finding it difficult to secure enough employees to process the supply. The EA has not demonstrated why local economies require yet more wood production in the face of the massive logging that has recently been conducted.

The EA fails to demonstrate how the proposed project will contribute to the "stability of local and regional economies," not specifying a breakdown in how revenues will be distributed. The EA should document how much revenue the local community will receive. How much will go to investors from out of the area? From out of state?

Recent award-winning news stories by respected news organizations reported that timber harvesting as it is currently being conducted in Oregon does not benefit local communities and economies, but actually undermines them and causes financial harm.

Big money bought Oregon's forests. Small timber communities are paying the price. - OPB

Timber Tax Cuts Cost Oregon Towns Billions. Then Polluted Water Drove Up the Price. [mdash] ProPublica

How We Analyzed Data From Oregon's Timber Industry [mdash] ProPublica

INADEQUACIES OF THE ENVIRONMENTAL ASSESSMENT

On repeated forest visits over the span of 16 months, a number of groups have scouted 40 of more than 200+ units, along with 7 proposed road projects. What they found is troubling. The facts on the ground do not align with the facts put forward in the EA, which contains errors, omissions and inconsistencies. The EA also fails to provide site-specific details about the

condition and characteristics of each stand proposed for treatment. These should be addressed before the project moves forward.

For example, on-site field checking revealed units proposed for treatment that are not overstocked as indicated by the EA. These units feature diverse understories, downed wood and ample snags, and should not be logged under the guise of "forest health." They contain mature stands well on their way to developing late-successional conditions.

Other stands are mischaracterized. They are not "overstocked" because they were never stocked to begin with. They are mature, natural stands, in place long before industrial plantations were established in the Willamette National Forest.

The EA stipulates that previously thinned units will not see riparian reserve thinning. Unit 43 has been previously thinned yet is slated for riparian reserve thinning. How many other similar units are mis-prescribed?

Unit 243 is depicted on the QMS Riparian buffer map as containing a significantly large section that will be buffered because of the Tommy Creek tributaries. In the EA document, the GMS Drainage map does not show water sources for Unit 243, even though field checkers have found multiple water sources on multiple visits.

The term "Commercial Thinning" is misleading. The text defines it as removing mostly small trees yet Figure 19 shows that all large trees are slated to be cut or converted to snags.

Units with older forest characteristics, healthy stand diversity and critical importance to wildlife do not meet project objectives and should not be included. These units include 26, 29, 166, 172, 240, 241 and 243.

Unit 43 should be eliminated from the project. According to field checkers, it was recently thinned and remains extremely open. The EA document specifies that this type of area will not be treated.

Unit 189 should be eliminated. According to field checkers, the road has washed out and extremely steep slopes covered with massive older trees are uphill of the slides. The proposed skyline logging would be destructive to this stand.

The new boundaries for Unit 137 have not been included in the EA.

Unit 177 is part of the Wilderness Area. No treatments should be allowed in these protected areas.

These errors are problematic and raise concerns about the significant swaths of land that field checkers have not been able to reach. In some important instances, relevant information has been omitted or not provided. The inconsistencies and omissions raise concerns about the legitimacy and reliability of the EA as a guiding document for the project.

PROJECT RECOMMENDATIONS

Alternative 2, the preferred alternative of forest managers, relies too heavily on harvesting mature trees. All stands more than 80 years old should be excluded from the project, without exception. Older stands should be excluded even if they are in the Matrix. The long-term ecological values of older trees far exceed the short-term monetary benefits of converting them to board feet of lumber. No scientific justification exists for logging or thinning our rapidly declining mature and old growth forests. These trees should be given our highest protection. The Forest Service should undertake a lighter-touch thinning regime only in those stands under 80 years old that have resulted from overstocked plantations.

In general, "creating diversity in structure and age class" should not be used as a justification for intensive logging.

Alternative 2 proposes to clear cut 140 acres of trees between 100-150 years of age by 85%. These trees are a rare category in the Willamette National Forest and should not be included in the project.

As mentioned earlier, Units 26, 29, 166, 172, 240, 241 and 243 should be withdrawn from the project. Field checkers documented older forest characteristics, stand diversity and critical importance to wildlife.

As mentioned earlier, Unit 43 was recently thinned and should be eliminated from the project, as it doesn't meet project objectives.

As mentioned before, Unit 189 should be withdrawn because a road washout with steep slopes will put older trees at significant risk during harvesting.

Recent wildfires in the area, and subsequent logging, have already provided a significant number of forest openings and a significant amount of younger forest structure and habitat. Additional artificially created openings should be eliminated.

Early seral habitat should not be carved from older stands.

"Shelterwood with Reserves" treatment should be excluded from the project.

The Forest Service should reduce the mileage and impacts of roads in the project in order to avoid damage to watersheds, fisheries and wildlife habitat.

A plan for reintroducing steelhead and salmon should be included in the EA. The Middle Santiam drainage, including Quartzville Creek, was historically the largest producer of salmon and steelhead within the Santiam watershed. How will these species be reintroduced?

Alternative 2, with its logging of old forest stands, should be eliminated from consideration by project managers. These forests should be protected for their important recreational, scenic, economic, wildlife habitat, water quality and carbon storage values.

I urge the Forest Supervisor to choose Alternative 4, with modifications.

CONCLUSIONS

The EA should offer a balanced and thorough economic analysis that compares the total economic revenues of the recreation sector versus the timber sector in Linn and Lane Counties. This analysis should explore the significance of older forests in relation to tourism. The EA should document economic benefits already received from recent post-fire salvage logging, and justify additional timber production at this time. Additionally, the EA should specify how timber revenues will be distributed. How much will remain in the local economies? In light of recent news stories, the EA should document how local communities will be helped, not harmed.

Alternative 2 relies too heavily on harvesting mature natural stands. Cutting older legacy trees should never be allowed in the Willamette National Forest. All stands more than 80 years old should be excluded from the project, even if they are in the Matrix. Early seral habitat should not be carved from older stands. "Shelterwood with Reserves" treatment should be excluded from the project. Units with older forest characteristics, stand diversity and critical importance to wildlife should not be included in the project.

The Willamette National Forest is loved by tens of thousands of residents, and the public should have a voice in how this forest is managed. Our greatest planetary emergency, in addition to climate change, is the loss of biodiversity. I urge the Forest Service to shift priorities toward greater protection of endangered older forests and adopt a plan that will provide adequate protections for biodiversity. New 21st-century economic realities dictate that timber output should no longer be the primary driver of management decisions.

Alternative 2, with its logging of older forest stands, should be eliminated from consideration. Alternative 4 eliminates logging in 140 acres of old growth stands and focuses solely on thinning previously logged, younger forests. This alternative will still produce 50 to 60 million board feet of timber over the next several years, meeting the identified purpose and need for the project.

I urge the Forest Service to choose a modified Alternative 4, and exclude Units 26, 29, 43, 137, 166, 172, 177, 189, 240, 241 and 243.

I look forward to your response to these comments, and request that you notify me when a decision is made.

Sincerely,

Nadene LeCheminant