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Organization: Audubon Society of Corvallis

Title: Conservation Chair

Comments: Quartzville-Middle Santiam Project NEPA comment

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Dear Deciding Official

Audubon Society of Corvallis and Salem Audubon Society represent over 600 members from across Linn, Benton, Polk and Marion Counties. Our members regularly travel, recreate, and study birds, wildlife and their habitats throughout the western Cascades. Please consider our comments as you review plans for the proposed Quartzville-Middle Santiam Project on the Sweet Home Ranger District of the Willamette National Forest.

Given the accelerating environmental crises including climate change and biodiversity loss, your District and its Forest must take seriously your role as caretaker of our public lands in the Western Cascades of Oregon. Encompassing the headwaters of Quartzville Creek and the Middle Santiam River, this unique area is well known by, proximate to, and upstream of the largest population centers of Oregon. It should be managed for its ability to provide carbon storage, clean water, and recreation opportunities. If we are to achieve resilient public lands, timber volume can no longer be the primary driver of management decisions in our Pacific Northwest forests. The Willamette National Forest must adjust its priorities to preserve our remaining mature and old-growth forests as the priceless carbon stores they are, as well as for their ever-increasing potential to sequester more carbon as they age.

We are concerned that your agency, USDA, in partnership with NOAA and the USFS PNW Research Station has published drought forecasts relevant to the future landscape conditions of the QMS Project. These are likely to fundamentally alter the trajectory of Project area vegetative cover types, soils, precipitation forms and amounts, and streamflow patterns sufficient to require additional administrative review if these projected conditions are not already fully incorporated into Project planning.

Under this Environmental Assessment decision, we urge the Forest Supervisor to choose a modified Alternative 4, which would log only stands under 80 years of age and would not employ harmful [ldquo]regeneration[rldquo] logging methods. This alternative would still produce 50-60 million board feet of timber but would refrain from any logging activity in the mature forests over 80 years of age that are so crucial to our climate future. Please consider ways to reduce the mileage and impacts of roads in this plan, which can damage watersheds and wildlife habitat, as well as increase fire risk by allowing vehicle access to formerly inaccessible places.

Additionally, your Forest should identify units to be dropped from Alternative 4 that contain special features or values as identified in the extensive ground-truthing efforts undertaken by concerned residents and communicated to the agency in comment letters at each stage of the NEPA process. The Forest should go further in analyzing the impacts of this alternative to Northern Spotted Owls and their habitat, considering how much key habitat now remains after recent wildfires and post-wildfire logging, as well as further analyzing a complete carbon lifecycle impact of this project.

We are additionally very concerned in the scale of this project, which considers taking significant actions over the 89,000 acre analysis area under a single Environmental Assessment, instead of being developed under 3 or more analysis areas that could be more thoroughly addressed. Finally, we ask your Forest to refrain from building

more roads into these watersheds with already current high-density road networks and focus its efforts on restoratively thinning young plantation stands that are accessible from the current road system.

Thank you for your consideration.

Jim Fairchild, Conservation Chair

Audubon Society of Corvallis

David Harrison, Conservation Chair

Salem Audubon Society