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Organization:

Title:

Comments: My name is Dave Barta. I have lived in Oregon most of my life and came here largely because of the access to the verdant outdoors. I'm a backpacker, mushroom forager and even occasionally a fisherman. I believe in the fundamental importance of wild places and the plants and animals that exist there. I find peace and tranquility, particularly in these difficult times, by going to the forest and have some places in the Middle Santiam region that are special to me.

I have spent literally weeks reviewing and inspecting the QMS Project. While I have been a volunteer field checker for Cascadia Wildlands for a number of years, these comments represent only my views.

I'm submitting comments of both a general and specific nature, though all are related one way or another to this project. I appreciate the opportunity to submit these comments and hope they will be taken seriously. You will find, embedded in them, some specific questions. I hope to receive answers to those questions.

First the general thoughts and suggestions:

Commercialization of the LSR improvement process:

Whenever the word "commercial", as in "commercial thinning", comes up in documents related to treatments for LSR forests it makes me cringe. That's because it is inappropriate for projects in LSR to have commercial aspects. They should only be intended to improve the development of the forest toward maturing wilderness. While improving the landscape and making a few bucks are not necessarily mutually exclusive, once a project has a commercial aspect it inherently alters the incentives in the wrong way.

But I also understand that much of this recovering second growth does need treatment to assist diverse growth and the BLM and FS try to make these projects commercial in order to fund the work. Ideally this work would be paid for by revenue from HLB sales or tax dollars, but for reasons political and bureaucratic they apparently are not, hence the perversion of your plans by the need for commercialization.

So, here is a suggestion and the first question that deserves a real answer: Has the Forest Service considered selling carbon offsets to fund this work and leave all of the carbon in the forest? If not, why?

If there was no need for LSR projects to be commercial, thinning could be done by single people on foot with chainsaws who walked the forest, dropping and bucking the trees that need to be thinned and leaving them there to rot and enhance the forest floor. Because this would not tear up the forest floor or require new roads, this could be done in a more gradual and more maintenance like way and not create the disturbance and destruction of the understory and undergrowth that comes from ground or cable logging, especially where you design for multiple entries. And this would significantly reduce the carbon footprint of these projects, turning them back into carbon sinks instead of being carbon neutral at best. That difference in carbon release is why these projects could be eligible for carbon offset funding.

Even if this idea has flaws, as I'm sure it does, it's an example of the out of the box thinking that needs to be taking hold within the Forest Service. In this time of climate change and wildfires, "same old, same old" and make sure there's timber for the mills doesn't work anymore and needs to be replaced by real innovation. Come on! You can do it!

Labor Day, 2020, fires changed the game:

The Labor Day, 2020, fires dramatically changed the landscape of the Middle Santiam region and the lumber market as well. The frantic salvage logging of private land as well as the tremendous amount of hazard trees taken from along roads created a glut of logs at mills at the same time as they had cut back on shifts, driving up the price of lumber even though there was tremendous supply of saw logs.

Maybe more importantly, the fires changed the composition of the forest on both public and private land. When managed properly, the timber plantations and Harvest Land Base create an orderly and sustainable succession for mills in the area. The fires changed that order in ways that may or may not be understood but have not been taken into account in Forest Service planning. Additionally, the fires significantly changed the amount of habitat available for endangered and threatened species in the region.

Because of the market and forest changes the QMS project should have been withdrawn and reconsidered with new goals in mind. Why has that not taken place?

The Devil is in the Details:

This is a massive project - too massive. In order to create a project this big you have, by necessity, had to omit the real details of what is going to happen. Locations and sizes of created openings, locations of skips, and intensity of thinning proposed are important details that need to be considered in the NEPA process and are completely omitted here. The Forest Service should take the information learned from the planning and public

comments thus far, withdraw this project completely as proposed, and resubmit it as multiple much smaller projects that actually include details. This is not as absurd as it sounds since much of the detail work on your end has already been done and you should be rethinking it because of the changes wrought by the fires anyway.

Sequestering Carbon:

There is a popular misconception I have heard repeated by government foresters and people with a vested interest in the timber industry. That is, that the best way to sequester carbon is to harvest forests, turn the wood into products that will last, and then create more sequestration by planting new trees. That notion has been fully scientifically debunked. The best way to sequester carbon is to let trees grow to old age.

Specific Comments:

The overarching specific comments is that Alternate 4 should be selected, dropping the 140 acres of shelterwood treatment and taking no trees over 80 years old. And units 166, 241, 242, and 243 should be dropped.

Additionally, I have the following comments on specific units:

Unit 106 - This is a mature multispecies forest with 50" Douglas Fir, Hemlock and true Fir. It is a little thick and might benefit from a very light thin with no dragging, but it would be better to leave it alone.

Unit 125 - Part of this unit is younger and could benefit from a final entry thin and snag creation. The rest of the unit is a steep grove of habitat trees that should be excluded from the sale and buffered.

Units 145, 154, 157 - This is thick, multispecies forest with maximum dbh 18". Thinning is appropriate.

Unit 160 - This is a second growth Douglas Fir plantation on a steep slope that shows signs of small slides and has two active streams. Because of the steepness and active streams, the most gentle logging techniques possible should be used here.

Unit 161 - This unit is super steep slope above a stream. It is 2nd Growth Douglas Fir to 12" dbh and could benefit from a very gentle thin, but not disturb the hillside and be sure to properly buffer the stream.

Unit 166 - This is such a lovely, diverse, wet forest. Some truly grand legacy trees as well as incredible diversity in the stand. A bit thick in spots but thinning itself. Leave it alone and drop it from the sale. Anything less is inappropriate.

Unit 173 - This is a diverse grove of Douglas Fir, Hemlock and Cedar with a stream and a bog. Lots of old wood on the ground. Leave this unit alone.

Units 273 and 275 - This is a big diverse unit and is on the edge of a big heavily logged matrix bowl so has cumulative impact issues and also has at least one riparian area that has not been excluded. The unit is steep, with mixed aged trees, including native forest along the riparian area. A simple riparian buffer might not exclude all of the larger trees from logging. I found Douglas Fir with dbh of 70" and Cedar with an average dbh of 40-50". Part of the unit is tree plantation and could be thinned, but drop the riparian area and the older section of the unit.

Unit 285 - Part of this unit is old growth and should be dropped. It includes an unbuffered riparian area and is quite steep. The unit should either be resurveyed carefully to drop the older section and riparian area, or dropped altogether.

Unit 288 - This unit is right on the road to the popular Iron Mountain hiking trail so visual aspects are important. It's young and thick and can use some thinning, but there is a stream through it that has some trees in the 30" dbh range next to it so buffer that carefully.

Thank you for the opportunity to comment on this project. I hope they will be taken seriously, as they are intended.

David Barta