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First name: Madeline

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Organization: Cascadia Wildlands

Title: Grassroots Organizer

Comments: Dear Public Land Manager:??

Please consider my comments as you review plans for the proposed Quartzville-Middle Santiam timber project on the Sweet Home Ranger District of the Willamette National Forest.

My name is Madeline Cowen, and I am the current Grassroots Organizer with the environmental non-profit organization, Cascadia Wildlands. Prior to starting this position, I was a volunteer with the organization and participated in field trips in which myself and others visited many of the units proposed in this project. Like many Oregonians, I highly value the recreation opportunities that can be found in the Willamette National Forest, spending much of my free time foraging for edible plants and mushrooms, hiking, bird watching, and camping in the forest. As a young person who will disproportionately experience the impacts of the climate crisis, I also deeply appreciate the carbon-sequestration and climate change mitigation potential of the intact native ecosystems in the Willamette National Forest.

As such, I strongly believe that this very special area encompassing the headwaters of Quartzville Creek and the Middle Santiam River should be managed for its ability to provide carbon storage, clean water, and recreation opportunities. In this era of accelerating environmental crises including climate change and biodiversity loss, the Forest Service must take seriously its role as steward of our public lands. 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 agency must shift your 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.

I am concerned with a number of aspects about this massive project. An overarching concern that I have is the size and scope of this project, as it is much too large to adequately be reviewed under the NEPA process. Nonetheless, I have read through the Draft EA and accompanying documents, and surveyed units in the proposed sale over the past two years. In this process, I found innumerable inconsistencies in the documents compared to what I witnessed on the ground, a poorly developed economic analysis heavily weighted towards the interests of the timber industry, an overreliance on harvesting mature and old growth native forests, and a lack of regard for emerging research which clearly shows the invaluable role that the forests of the Pacific Northwest can play in mitigating the climate crisis if left unlogged.

I 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 "regeneration" 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, the Forest Service should identify units to be dropped from Alternative 4 that contain special features or values as identified in the extensive field checking efforts undertaken by concerned local residents and communicated to the agency in comment letters at each stage of the NEPA process. And, the Forest Service should go further in analyzing the impacts of this alternative to Northern spotted owls and their habitat, taking into particular consideration how much key habitat was lost in recent wildfires, as well as the complete carbon life cycle analysis for this project. Finally, I ask the Forest Service to refrain from building more roads into these heavily roaded watersheds and focus its efforts on thinning previously managed, young plantation stands that are

accessible from the current road system.

I also want to urge you to make additional changes to address the following concerns I have about the project: Using the EA analysis of timber-related revenue, Alternative 4 would provide significant socio economic benefits to both Lane and Linn counties, contribute to the National Forest Fund, and support roads and schools in Linn County. If the EA's economic analysis were to include the value of carbon storage and even a small portion of what Linn County receives annually from recreational visitors, the proposed socio-economic benefit of the National Forest would exceed all projected timber values.

A more complete economic analysis should be conducted, focused on 21st century realities. How has the local timber supply increased following recent fires and subsequent salvage logging? What are the projected needs of the local economies, both timber and non-timber? What is the contribution of forest recreation to the local economy? What new, sustainable, and non-extractive forest-based industries are being considered for the future?

All units with stands over 80 years old should be excluded from the project, even if they are in the Matrix. These older stands have long-term ecological value that far exceeds their short term monetary value.

'Shelterwood with Reserves' treatment should be excluded from the project. Early seral habitat should not be carved from mature stands. Emerging climate science specific to Region 6 should be a critical part of this environmental assessment. Planning for future reintroduction of salmon and steelhead should be included in this assessment.

Exclude Units 166, 172, 240, 241, 243 from planned harvest. These are units that have older forest characteristics, considerable stand diversity, and high potential for habitat for sensitive species. Exclude other units with similar older forest characteristics. In the southern section of Unit 243, Cascadia Wildlands volunteers found a significant number of trees with a diameter at breast height (DBH) of well over 70 inches.

Exclude Units 26 and 29 from planned harvest. These units have diverse understories (> 25 species when quickly surveyed in October) with large amounts of downed wood and snags. Unit 29 has 3 riparian areas with well-developed hardwoods (3.5' diameter cottonwood, alders) and downed wood in the stream. These two units also provide a travel corridor for wildlife from the old growth west of Unit 26 (bordered on the west by private clearcuts) to the main forest to the east. Exclude other units with similar forest habitat characteristics.

Exclude Unit 43 from planned harvest. It was recently extensively thinned and remains extremely open. Understory is developing. The proposed treatment calls for 10 acres with 6 acres in Riparian Reserves. This contradicts the EA Chapter 2, which states: "Stands that have previously been thinned or are proposed for shelterwood with reserve treatments would have no treatment in the Riparian Reserves."

Exclude Unit 189 from planned harvest. The road has completely washed out leading to Unit 189 and covered by a landslide at the Unit. This unit has some of the steepest slopes in the entire project area with large old-growth trees just uphill of rock slides. It would be extremely difficult to develop a landing for the proposed skyline logging. Exclude other units with similar slope characteristics.

Address inconsistencies, errors, and omitted information within the EA

Unit 177 is in the Wilderness Area. Why is this treatment necessary in a Wilderness Area?

Unit 137 - the new boundaries are not in the EA.

Unit 43 has proposed riparian reserve thinning, even though the EA states that previously thinned units will not have riparian reserve thinning. Our concern is that other units are also mis prescribed.

The characterization of 'Commercial Thinning' is misleading. The text defines it as removing mostly small trees, Figure 19 illustrates all big trees are removed or turned into snags.

Unit 243 is shown on the QMS Riparian buffer map to have a very large section that will be buffered because of the Tommy Creek tributaries. Visiting there multiple times, we witnessed multiple water sources. However, there are no maps in the EA that show any water in Unit 243.

These errors, omissions, and contradictions are troubling and they raise concerns over the credibility of the EA.

This project is too big and too rushed to be scientifically sound and socially responsible. While we urge you to choose Alternative 4 for the reasons we have stated, we also insist that you address these other concerns in any final decision.

Appendix: Research references and citations

Re forest carbon stores

Buotte et al. Forest carbon and biodiversity co-benefits of preserving forests in the western US. *Ecol Applic Mar* 2020. doi.org/10.1002/eap.2039

"Preservation of high carbon density Pacific Northwest forests that are also economically valuable for timber production will have costs and benefits to consider, including socioenvironmental benefits, the feasibility of preservation, and opportunity costs harvest. There is tremendous potential for proforestation, growing existing forests intact to their ecological potential, which is an effective, immediate, and low-cost approach to removing carbon dioxide from the atmosphere. Proforestation serves the greatest public good by maximizing co-benefits such as biological carbon sequestration and unparalleled ecosystem services including biodiversity enhancement, water and air quality, flood and erosion control, and low impact recreation. The development of governance programs to promote forest preservation will be critical."

"The high-carbon-priority forests are primarily along the Pacific coast and the Cascade Mountains.

These high-productivity, low-vulnerability forests have the potential to sequester up to 5,450 Tg CO₂ equivalent (1,485 Tg C) by 2099, which is up to 20% of the global mitigation potential previously identified for all temperate and boreal forests, or up to ~6 yr of current regional fossil fuel emissions. Additionally, these forests currently have high above- and belowground carbon density, high tree species richness, and a high proportion of critical habitat for endangered vertebrate species, indicating a strong potential to support biodiversity into the future and promote ecosystem resilience to climate change."

"We found that these high-carbon-priority forests exhibit features of older, intact forests with high structural diversity, including carbon density and tree species richness. Forest resilience and adaptive capacity increase with increasing plant species richness, suggesting that preserving the high-carbon-priority forests would provide an added buffer against potential ecosystem transformation to future climate change."

William R Moomaw et al. Forests & soils meeting climate mitigation goals. *Environ. Res. Lett* April 2020. 15 045009 doi.org/10.1088/1748-9326/ab6b38

"Forests could store substantially more carbon if allowed to grow and reach their ecological potential. Preserving our current primary forests and allowing secondary forests to grow for carbon storage would increase carbon sinks in the near and intermediate future."

Dominick A. Delasalla, et al. Primary Forests Are Undervalued in the Climate Emergency. May 2020, *BioScience* 70(6). DOI:10.1093/biosci/biaa030

"The climate change mitigation benefit of forests in general is to store large amounts of carbon in a stable, self-regenerating and long-term reservoir. Therefore, even if we eliminate fossil fuels, continued forest degradation will generate severe climate disruptions."

William J. Ripple, et al. The Climate Emergency, Forests, and Transformative Change. June 2020 *BioScience* 70(6):446-447. DOI:10.1093/biosci/biaa032

"Scientists, teachers, and citizens must boldly address climate change by taking the actions necessary to avoid the otherwise inevitable consequences. We need genuine transformative change in how we mitigate and adapt to the climate crisis. This will entail massive personal, societal, and global political adjustments in how we function on our finite and now damaged planet in terms of energy, pollution, nature, food, economy, and human population issues."

Re salmon and steelhead reintroductions

Dept of Commerce, Final Biological Opinion on the Willamette Basin Review Feasibility Study, Willamette River Basin, Oregon. June 2019.

https://legacy-assets.eenews.net/open_files/assets/2020/10/27/document_gw_03.pdf

Oregon Department of Fish and Wildlife Willamette River Biological Opinion

<http://withinourreach.net/downloads/Friesen.pdf>

National Oceanic and Atmospheric Administration Willamette River Biological Opinion

<https://www.fisheries.noaa.gov/west-coast/endangered-species-conservation/willamette-river-biological-opinion>

Northwest Environmental Defense Center, WildEarth Guardians, and Native Fish Opinion & Society,

Plaintiffs, V. United States Army Corps of Engineers and National Marine Fisheries Service. 18-cv-00437-HZ

09-01-2021

<https://casetext.com/case/nw-envtl-def-ctr-v-united-states-army-corps-of-engrs>

Ruling forces Corps to make immediate changes to dams in Willamette Valley to save salmon. By Bill Poehler. Salem Statesman Journal, July 20, 2021.

<https://www.statesmanjournal.com/story/news/2021/07/20/willamette-valley-dams-ruling-forces-corps-make-changes-salmon/8030512002/>