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I would like to comment on the QMS Draft EA.

I worked for the Bureau of Land Management in Botany and weed management. I was one of the only east side scientists on the West side spotted owl plan (FEMAT). I am all too familiar with the negative impacts from roads, and logging.

I taught Forest health all over the US and eastern Europe. Logging is rarely healthy.

1. The draft EA was released in the winter, with an inadequate description of road plans. The project in the few areas that were accessible found we found limited road access and many omissions and errors in the information provided, such as missing streams, incorrect characterization of some unit densities, presence of

older trees, snags, etc.

2. After all the delays and postponements of the release of the draft EA, it was released at beginning of the Thanksgiving-Christmas holiday when many people were busy with holiday activities and unavailable to do a thorough study and response to the draft EA.

3. The comment deadline came on Dec 10. How many and which FS staff will be working at that time to

review comments? The rushed public comments will likely be sitting on the desks of absent staff, unreviewed until well into the New Year.

4. We were told that the comment period could not, by law, be extended. Had the draft EA, or preferably, a draft EIS been released in January, the legally immovable comment period would have occurred after the busy holiday season. After the previous year of delays, six more weeks of delay, especially in the winter, would

have made little difference to the Forest Service.

5. Because this is such a large project, an EIS is warranted. This would have allowed a 45 day comment period.

Along with a release date of, say, January 1, a small improvement in the ability of the public to respond would

have been possible. Better yet, a draft EIS should have been written and released in late spring, when the

project area would be accessible for public field checking.

These comment restrictions violate the requirements of the law to provide for meaningful public input. These and other problems, mentioned above, demonstrates that, even given numerous extensions in release of the draft, that the QMS project is too large for even the Forest Service, with all of its resources, to produce a complete and credible EA.

On November 24, one interested party received a map of the temporary roads, not included in the draft EA, released on November 10. This information is vital to all interested parties as we prepare our comments. Does this late release of such information constitute an amendment of the draft EA and thus, extends the comment deadline? Is the deadline extended until all interested parties receive this information?

Had the project been done in smaller pieces rather than one project over many years, separate EAs or EISs would have been done over time. As it stands, later phases will be done under an (outdated) EA, not reflecting the conditions at the later times, such as wildfires, climate change, economic conditions etc. The Forest Service promised to implement this project in stages. Where is this promise in the draft EA? Also, 5-10 years from now when later phases of this project are implemented, population growth in the area will bring new people with different expectations. The old EA will prevent those views from influencing implementation of the project.

Fourteen days after the draft EA was released, an article about the project appeared in the local newspaper. A Forest Service official stated "I hope people look themselves and not just respond to calls to action they get in their email." With only sixteen days left to comment, his doesn't invite thoughtful public comments, especially with much of the area under snow during the holiday season. How are people supposed to "look for themselves" and provide thoughtful response under such circumstances? Does this also imply that responses to email "calls for action" won't be taken seriously?

I generally supports scientifically sound variable density thinning with constraining safeguards to accelerate the onset of late-successional forest characteristics in the monoculture plantations.

I oppose the logging of any kind in forest stands that have not been logged or only lightly so. This includes older (mature and old-growth) stands in any land allocation or management. In the QMS project area this opposition includes all units characterized as "fire regenerated" and any unit identified as

more than 100 years old.

The proposed project would have such a significant impact on the human environment that a full environmental impact statement is necessary. An EIS is required when a proposed project is controversial. The logging of older (mature and old-growth) forests is very controversial, especially on federal public forestlands. The QMS project draft EA attempts to tie its justification to the Willamette National Forest Land and Resource Management Plan of 1990, as amended primarily by the Northwest Forest Plan in 1994. The ages of the LRMPs that the Willamette National Forest is operating under are approximately a quarter century old. Since that time, there has been significant new information that has not been considered in the Willamette LRMP. This raises significant questions including, but not limited to:

1. Barred Owl. The invasion of the barred owl into northern spotted owl habitat. Does the proposed logging exacerbate the problem of invasive barred owls displacing native spotted owls?

2. Carbon. The importance of retaining carbon in forest stands to minimize the worst of climate change. The carbon analysis in the draft EA is inadequate, contradictory, and misleading. For example, the draft EA says:

In addition, because the direct and indirect effects would be negligible, the proposed action's contribution to cumulative effects on global GHGs and climate change would also be negligible

By this "reasoning," any one timber sale, any one feedlot, any one oil or gas pipeline, any one coal-fired electric plant is "negligible." The cumulative total of a large number of negligibles is significant. The EA must either consider effects of this project cumulatively or tier to an environmental impact statement that does.

We have a few questions we would like answered/addressed/explained in the final environmental assessment or replacement EA. These questions are discussed in greater detail in these comments.

1. Why are the "net" timber volumes in MMBF listed in Table 48 for each alternative significantly higher than the "gross" timber volumes in MMBF listed in Tables 2, 3, and 4 and why are the calculations of Table 48 so erroneous?

2. Why are Figures 4 and 5, though described as two maps of two, not consistent? One features land allocation while the other management allocations? Under law, the Forest Service is required to administer the lands consistent with the land allocation and/or management allocation that is the most restrictive.

It has been 2 1/2 years since the QMS project was announced. Much has changed in our public forests since then, particularly due to last year's and this year's fires.

One of the original purposes: "Contribute to a predictable, sustainable supply of forest products to help maintain the stability of local and regional economies and markets" is no longer valid: supplying local mills with timber is being abundantly accomplished as trees salvaged from the fire are delivered to the mills.

Furthermore, the decline in local timber jobs has been going on for a number of years, due to automation in the mills and mechanization in the woods.

Public trees should not be used to supply profits to distant corporations and their stockholders who have an insatiable demand for short-term profits. Record high lumber prices driven by the demands of the housing replacement market are already providing record profits " Large corporations and lumber manufacturers are thriving, said Brooks Mendell, president of the forest investment consultancy Forisk. "You can see it's showing up in their financial statements, and the publicly traded guys and the private guys are doing really well," Mendell said. "They're investing in their mills and they're just doing extremely well."

The purpose of restoring the degraded public forests remains. The loss of so much public forest lands in the recent years' fires makes this purpose even more compelling. The wildlife displaced by the fires need natural forests more than ever.

Fish have lost miles of functioning streams due to erosion from fire devastated lands. Remaining streams in the QMS project area must be protected to take up the slack.

Clean drinking water needed by downstream cities such as Salem must be supplied by the restored remaining unburned forests in their watersheds.

Please redo this and break it up into several different EIS's.

thank you for the opportunity to comment.

Sincerely,

Roger Rosentreter PhD