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First name: Beth
Last name: Dayton
Organization: Salem Area Trail Alliance
Title: President
Comments: December 19, 2019
Dear Joanie,
Thank you for the opportunity to comment on the Quartzville-Middle Santiam (QMS) Project. As you know, this is an area where I have done a considerable amount of hiking and volunteer trail maintenance, as well as attended several meetings and a field trip with the Sweet Home Ranger District regarding the QMS. I am the President of Salem Area Trail Alliance and lead The Salamander Volunteer Trail Crew under an agreement with the US Forest Service, and I have also volunteered in this area with work parties run by Oregon Timber Trail Alliance and Trans-Cascadia.
The project description states that the purpose and needs of the project are to contribute a sustainable supply of timber, improve stand health in the LSR and manage the road network needed for timber harvest. On page 2 it is noted that the NFMA requires a management program based on multiple use. My concern is that the three stated purposes of the QMS address only one use of the public forest, which is timber harvest. I feel that the QMS should add two additional important purposes, which truly address the issue of multiple use:
1. The QMS should maintain and enhance recreational use of the forest. The long-term stability of local and regional economies is strongly affected by outdoor recreation, including use of public lands for hiking, picnicking, horseback riding, fishing, hunting and mountain biking. Recreational access could be potentially improved through the QMS by actions such as improving or maintaining road access to important sites such as trailheads and campsites. The quality of the recreational experience could also be degraded by the QMS project through increased road traffic, noise, viewshed destruction, impingement on trails and decreased water quality and wildlife density. For full transparency, all maps indicating the potential harvest units should prominently include important recreational facilities such as trails, trailheads, campgrounds and commonly used areas of dispersed camping.
2. The QMS should protect and enhance the natural ecosystem, including plants, animals, water quality and air quality. The QMS could have positive effects such as decreasing stream siltation from eroded roadbeds and failed stream crossings. However, even considering that all the units that are harvested will undergo a standard NEPA evaluation, there can still be very significant detrimental effects on ecosystems and some areas should be left undisturbed. In particular I am concerned that the QMS allows harvest of trees in the 100-150 year age range in fire regenerated stands. These stands may be very close to the quality of old growth and cannot be replenished in a time period that is meaningful to humans or many of the species that reside there. I feel that the age of stands that can be harvested should be the same in fire regenerated stands as in plantations.
I have specific concerns with several of the proposed harvest units (see attached map).
Unit 176: This unit is directly adjacent to the Middle Santiam Wilderness and to an important trail system as well as the main stem of Pyramid Creek. Work in this area would require re-establishment of a road bed and a significant bridge. The forest in this area has a quality very close to Wilderness old growth and is important for continuity for species living within the Wilderness. I am also very concerned about water quality as it drains into the Wilderness, and the detrimental effect on the recreational experience on the nearby trail. I would like to see unit 176 withdrawn from consideration.
Units 177 and 189: These units are also directly adjacent to the Middle Santiam Wilderness and I feel should be withdrawn based on similar principles to unit 176.
Unit 147: This unit lies directly in the watershed of multiple important waterways that ultimately drain into the Wilderness. I feel that this unit should be withdrawn to protect water quality and riparian habitat.
Unit 137: This unit lies directly adjacent to a long segment of a tributary of Swamp Creek, which is an important waterway that drains into the Wilderness. The forest directly south of this unit and along the same waterway is some of the most spectacular preserved old growth in this entire region, some of which is inside the Wilderness boundary and some of which is outside. I feel that timber harvest should not be done on the southern two-thirds of unit 137, or on any area west of FR 648 to avoid harm to this ecosystem. I would argue that the entire strip

just east of the Wilderness boundary extending to the Chimney Peak Trail should be under permanent protection. Thank you very much for your consideration. I look forward to our continued communication regarding this very important area.
Sincerely,

Beth Dayton M.D.