

July 15, 2020

Tom Russell



Richard Periman Forest Supervisor, Objection Reviewing Officer
Mt Hood National Forest
16400 Champion Way
Sandy, OR 97055

RE: In accordance with 36 CFR §218, I object to the Environmental Assessment (“EA”) and draft Decision Notice for the Waucoma Huckleberry Enhancement Project.

Location: West Fork Hood River Watershed, Hood River Ranger District of the Mt. Hood National Forest in Hood River County, Oregon.

Objectors Interest: I am an Oregon resident and rely on Mt Hood National Forest for clean air, clean water, recreation for physical and mental health, and as a vital asset for carbon sequestration.

In my comments submitted March 18, 2020, I highlighted concerns about the efficacy of Shelterwood treatments for the Purpose and Need of Huckleberry Enhancement. In reviewing the EA, the accompanying Botany Report and the Consideration of Comments for the EA, my concern has not been resolved. The Shelterwood treatments will reduce the canopy below ideal levels for huckleberries, and the EA and accompanying reports do not sufficiently justify how a Shelterwood approach meets the Purpose and Need.

These Shelterwood units are also high contributors to the climate change impact of this project which was also a main focus of my Draft EA comments. No substantive analysis of the impact of this project has been done, nor has the cumulative impact been properly examined. The Climate Change Report references the global nature of climate change and that its contribution to cumulative effects is negligible (p. 3). While climate change is a global problem, the issue is that we are extracting resources at an unsustainable rate, on a cumulative basis. Any one project isn't causing climate change and its negative effects, it is all of the extraction added together, persistently over the years.

This analysis doesn't examine all the other projects in Mount Hood National Forest, on adjacent private and county lands, other national forests and BLM lands in Oregon. The consensus is clear that climate change is an urgent problem and we need to use all the tools possible to combat its negative effects.

This Climate Change Report also states that: *"A quantitative carbon analysis was not conducted for this project because it would not likely lead to changes to the proposed actions or to the creation of other alternatives that achieve the purpose and need"* (p. 1).

This specific section is concerning since it indicates an unwillingness to take a hard look at science that might change the proposed action. Comments have specifically pointed to undisputed research on the advanced role that forests in the Pacific Northwest have in the fight against climate change. It is imperative that when a forest management action is taken, it considers all information to make a wise decision.

As my comment from March suggested, the quantitative carbon analysis is necessary to ensure that we know the full impact of the Proposed Action, so that we can balance that against the Purpose and Need. We should know the extent of the negative impacts going into the decision, so that we can be fully informed of what we are giving up to achieve the Purpose and Need.

My proposed remedy for the Waucoma Huckleberry Enhancement Project is to drop the Shelterwood units from the Proposed Action. I would also urge that a carbon analysis is conducted, and a measured review of the results will be weighed against the desired benefits from the project to see if further modifications should be made.

I appreciate your review of this objection and consideration of the proposed remedies as an option to improve the EA and the Waucoma Huckleberry Enhancement Project.

Sincerely,

A handwritten signature in black ink, appearing to read 'Th Russell', enclosed within a hand-drawn oval.

Thomas Russell