

**From:** [Felice K](#)  
**To:** [FS-objections-pnw-mthood](#)  
**Subject:** Waucoma Huckleberry Enhancement  
**Date:** Thursday, July 16, 2020 2:44:25 PM

---

To Whom It May Concern:

I would like to file an objection to the draft decision notice and Finding of No Significant Impact for the Waucoma Huckleberry Enhancement Project. I appreciate the alterations to the project design criteria that were made in response to public comment, especially the alteration that "Contiguous shelterwood treatments would be limited to no more than 60 acres and would be separated by blocks of land not classified as created openings as defined in the Forest Plan", which would help ameliorate some of the habitat fragmentation.

One of my initial comments was that I am concerned about habitat fragmentation due to road building, even if those roads are ostensibly temporary. In the Finding of No Significant Impact the locations of the roads are still not specified, and the "likely" or "unlikely" area designations don't seem to provide enough information to assess whether there will be a significant impact or not, especially since many of the areas "likely" to contain temporary roads are adjacent to the Mark O. Hatfield Wilderness, and could result in degradation of the wilderness characteristics of that area. In the modification to the PDC it is stated that, "Within treatment units 2, 3, 4, 7, 9, 28, and 43, late-seral characteristics would be preserved within the stands where they exist to meet the standards established in the Region 6 Interim Old Growth Definition (Hopkins 1993). Treatments in these units would be focused around existing huckleberry patches and along roads." I interpreted that to mean that treatments would be focused around already existing roads to limit disturbance in these units, but then units 4, 7, and 43 are all marked as "likely" to have temporary roads, which would obviously degrade the forest in these units. The areas marked "likely" are also so large that specifying them doesn't really supply useful information.

I also object to the analysis that there is no significant impact because this is a small percentage of the total Mt Hood National Forest. As a percentage of the total this is true, but in absolute terms this is a large project, and these forests, especially the older forests, remain an important reservoir for carbon and old-growth dependent species.

I respectfully request a resolution of these objections.

Sincerely,  
Felice Kelly