



VIA email: objections-pnw-mthood@usda.gov

October 29, 2020

Forest Supervisor, Objecting Reviewing Officer
Mt Hood National Forest
16400 Champion Way
Sandy, OR 97055

RE: Zigzag Environmental Assessment Statement Objection

Pursuant to 36 C.F.R. Part 218.8, the American Forest Resource Council files this objection to the proposed draft decision for the Zigzag Environmental Assessment. Zigzag District Ranger Bill Westbrook is the responsible official. The Zigzag Project occurs on the Zigzag Ranger District on the Mt Hood National Forest.

Objector

American Forest Resource Council
700 NE Multnomah, Suite 320
Portland, Oregon 97232
(503) 222-9505

AFRC is an Oregon nonprofit corporation that represents the forest products industry throughout Oregon, Washington, Idaho, Montana, and California. AFRC represents over 50 forest product businesses and forest landowners. AFRC's mission is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies and decisions regarding access to and management of public forest lands and protection of all forest lands. The Zigzag Project will, if properly implemented, benefit AFRC's members and help ensure a reliable supply of public timber in an area where the commodity is greatly needed.

Objector's Designated Representative

Andy Geissler, Federal Timber Program Director
2300 Oakmont Way; Suite 205
Eugene, OR 97401
541-342-1892
ageissler@amforest.org

Reasons for the Objection

The content of this objection below is based upon the prior specific written comments submitted by AFRC in response to the Draft EA which are hereby incorporated by reference.

1) Deferral of new/temporary road construction to access certain treatment units with conventional logging systems does not meet the Purpose & Need element related to Transportation System Management.

The Purpose & Need as it appears in the Final EA includes, among other things, the following under the heading “Transportation System Management”:

“Have a landscape accessed by an appropriate network of roads that provide for management access and visitor safety while minimizing risk to aquatic resources”

During AFRC’s site visits to the project area, we focused on assessing the economic viability of the project. Specifically, we reviewed those units proposed for helicopter yarding to explore alternate access options that would be in line with the Purpose & Need element stated above related to the transportation system management while facilitating conventional yarding systems.

One such field visit was to unit 8 in the Horseshoe Area of the project. Unit 8 is identified for helicopter yarding. During that visit we identified a potential alternative access route to use conventional yarding systems. We outlined that alternative route in our written EA comments, which are copied below:

“During on our field visits we identified an opportunity to build a short spur road off the 1800 road across the powerline right-of-way and cable yard the entire unit. The first segment of the road across the ROW already exists as a previous road. Extending this road into the unit would locate a tower landing approximately 175-feet away from the power lines—a distance that should facilitate safe cable yarding. Please see the map below that approximates the road and landing location and consider amending the EA and logging plan to accommodate this option.”

We also included a map in our written comments to fully illustrate the proposed road location. Based on its location on a ridgetop feature we believe that its construction and use would align with the Purpose & Need as it relates to a road network that “minimizes risk to aquatic resources” while “providing for management access.”

This request was not directly addressed in the “consideration of comments” document posted on the project web page. The only reference made in the document regarding the transportation system included: “Comments received about the transportation system were considered, and the road repairs, maintenance, closures and decommissioning were found to be appropriate to provide safe access to the forest while minimizing resource impacts and cost.” This response does not address our request for road *construction*, and instead only focused on road repair, maintenance, closures and decommissioning. Further down in the document the Forest Service

addresses public comment on specific road recommendations. However, once again, only public requests for additional road decommissioning were noted.

Resolution Requested

AFRC requests that the Deciding Official consider and address our proposed modification to the transportation network.

- 2) Because the inaction described in Alternative 1 (No Action) of the Final EA does not meet numerous components of the Purpose & Need of the project, incorporation of any of its elements would retard the attainment of the resource objectives that are identified in the Purpose & Need.**

The Purpose & Need as it appears in the EA includes the following:

“Have live productive forest stands that can provide wood products now and in the future.”

AFRC has expressed its concern regarding not only the current short-term provision of timber products but also the long-term provision of those products. We articulated this concern in our written comments in response to the EA:

“Matrix lands are the only designated lands on the Mt Hood where sustainable timber management may occur. This sustainability is crucially important to AFRC’s members and we continuously advocate for forest management that addresses it. The “thinning-only” management paradigm adopted by the Mt. Hood National Forest since the NWFP was signed has provided a short-term supply of timber products, but unfortunately cannot fulfill the sustained long-term supply that we believe the Forest Service is mandated to provide; in other words, the stands suitable for thinning will eventually be depleted. Douglas-fir forests require regeneration harvest at some point in their life cycle to regenerate. Although the Zigzag project does not propose such treatments, the small amount of gap creation proposed will at least create some level of early seral habitat and we urge the District to implement those openings to the fullest extent analyzed.”

Those gap creations that create a minor, but important, amount of early seral habitat and young forests are critical to attaining the Purpose & Need of the project and the Forest’s directives to manage its Matrix land allocation for sustainable timber products. Deferral of those treatments, or modification of those treatments that omit the early seral creation, would retard the attainment of the Purpose & Need and retard the ability of the Forest Service to attain its long-term sustainable timber objectives on Matrix land.

The Purpose & Need as it appears in the EA includes the following:

“Have stands that are healthy with growth rates commensurate with site capability”

In AFRC's opinion, the goal of any Forest Service vegetation management project should be to meet the stated project objectives to the maximum extent across as many acres of the project area as possible. The scope, measured in acres treated for this project, should be the metric that indicates how well the Forest Service is meeting its stated objectives on any given project. In other words, meeting the stated Purpose & Need on 500 acres is inferior to meeting the stated Purpose & Need on 600 acres.

In our Draft EA comments, we expressed concern regarding the scope of the project relative to the project area. The Draft Decision Notice considers the treatment of 1,989 acres, which constitutes only 12% of the entire project area managed by the Forest Service. Our Draft EA comments stated that: *the consideration of every stand where treatment is appropriate, regardless of its land allocation, is important to our membership as each year's timber sale program is a function of the treatment of aggregate forested stands across the landscape.* This concern over maximizing treatment acres applies not just to our membership's needs but also to the full attainment of the stated Purpose & Need as referenced above. Any reduction in acres will inhibit the attainment of the project objectives.

Fewer acres treated with group selection and variable thinning including gap creation will result in fewer acres with improved diversity, density, and structure. In particular, the gaps and group selections that provide early seral habitat, which is deficient on Forest Service land in the project area, are critical to attaining and maximizing stand diversity. Any reduction in the already meager level of early seral creation would further diminish the improvements to landscape level diversity.

Resolution Requested

AFRC requests that the Deciding Official not incorporate any elements of the No Action alternative into the selected alternative. As the current decision is a draft decision, potential exists for both the reduction of the level of acres treated and the intensity of those treatments that would compromise the forest health and diversity objectives stated.

Request for Resolution Meeting

Pursuant to 36 C.F.R. § 218.11, the objectors request to meet with the reviewing officer to discuss the issues raised in this objection and potential resolution. In the event multiple objections are filed on this decision, AFRC respectfully requests that the resolution meeting be held with all objectors present. AFRC believes that having all objectors together at one time, though perhaps making for a longer meeting, in the long run will be a more expeditious process to either resolve appeal issues or move the process along. As you know, 36 C.F.R. § 218.11 gives the Reviewing Officer considerable discretion as to the form of resolution meetings. With that in mind, AFRC requests to participate to the maximum extent practicable, and specifically requests to be able to comment on points made by other objectors in the course of the objection resolution meeting.

Thank you for your efforts on this project and your consideration of this objection. AFRC looks forward to our initial resolution meeting. Please contact our representative, Andy Geissler, at the address and phone number shown above, to arrange a date for the resolution meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "Travis Joseph". The signature is written in a cursive, flowing style with a prominent initial "T".

Travis Joseph
President