

From: [Melanie Farnsworth](#)
To: [FS-objections-pnw-mthood](#)
Subject: objection
Date: Monday, November 9, 2020 11:15:41 AM

Melanie Farnsworth



To: Richard Periman, Forest Supervisor & Objection Reviewing Officer

Mt. Hood National Forest

16400 Champion Way

Sandy, OR 97055

Submitted via email to: objections-pnw-mthood@fs.fed.us

RE: In accordance with 36 CFR §218, I object to the Environmental Assessment (“EA”) and draft Decision for the Zigzag Integrated Resource Project.

Location: Salmon and Sandy River watersheds, Zigzag Ranger District, Mt. Hood National Forest

Objector’s Interests: I live n Rhododendron, Oregon and recreate in the area. There have been several crucial developments since the evaluation was undertaken. We’ve had a catastrophhic wildfire season destroying the carbon sequestration potential of the Mt. Hood National Forest. We now have a wildlife sequestration issue. In our area we now have a sow bear with 2 cubs in addition to a new larger bear. In the past we have had a couple of smaller bears. ALSO, there has been a presidential election that will bring us a science-based administration.

Requested Relief: Complete and disclose a full analysis of impacts, as is required by NEPA, related to climate change to the Biden administration and immediately cease any and all planning and/or new timber harvesting related activities on the Mt. Hood National Forest.

I submit this Objection for the following reasons: Drastic changes have changed the resources and forest “volume” in the area affecting the ability to sequester carbon and wildlife fleeing from the fire stricken areas. There has also been a presidential election which will enlighten the process of forest management. This was a 20thy century plan but we are clearly in the 21st century and 21st century logic must be applied.

I am writing today to voice the above concerns about the Preliminary Assessment.

Before I reiterate previously submitted comments, I want to thank the United States Forest Service for all the work you do to maintain our public lands and for making some adjustments in the Zigzag PA. I am also aware that the Service is being asked to meet increased timber sale quotas by the current federal administration. But as a Portland, Oregon resident and watershed restoration volunteer who appreciates the Mt. Hood National Forest for many reasons – hiking, camping, wildlife tracking – I must add that I am disappointed that a 20-year nexus of restoration, recreation, and natural forest regeneration will be disrupted by the reintroduction of timber sales in the Zigzag Ranger District.

Accordingly, I feel compelled to ask the Service to address a number of issues raised by the Zigzag PA. I do this keeping in mind the recent ruling by the 9th Circuit Court which found that a Forest Service EA for the Crystal Clear Timber Sale in Mt. Hood National Forest was inadequate in part for failing to engage with scientific evidence that was contrary to that of the Service or otherwise less than adequate by standards of NEPA.

Northern Spotted Owl

To begin, I want to address the regeneration harvest of Unit 129 relative to science regarding the Northern Spotted Owl.

From “Zigzag Wildlife Report”: Section 1.0 Endangered Species Act Compliance; Northern Spotted Owl:

*The project area does not contain Critical Habitat for spotted owls. There are no proposed habitat removing or degrading treatments within suitable owl habitat. There are four historic owl home ranges present but none would be substantially affected. Treatments include the **removal of approximately 13 acres of current dispersal habitat through regeneration harvest** and the maintenance of over 1,872 acres of current dispersal habitat with variable-density thinning. Dispersal habitat is not a limiting factor in the project area. There would likely be some short-term impact to prey species including flying squirrels.*

From Section 3.1.3.2 Stand Productivity, Health and Diversity:

A regeneration harvest (shelterwood with reserve silvicultural system) would be used in Unit 129 to reduce the spread of dwarf mistletoe (*Arceuthobium tsugense*), a parasite that depends entirely on its host for food. Major hosts include western hemlock, Pacific silver fir, noble fir, and mountain hemlock.

This unit is 13 acres in size, is 117 years old, and has an average diameter of 11.5 inches.

While dwarf mistletoe is scientifically cited as problematic for certain species in silviculture stands, it is also cited as playing an integral role in forest ecology by 1) providing home or habitat for many birds and insects, and 2) contributing to natural forest regeneration cycles. Northern spotted owls are also known to favor large trees infested with dwarf mistletoe.

From "Northern Spotted Owl"; Washington Fish and Wildlife:

<https://www.fws.gov/wafwo/articles.cfm?id=149489593>

Northern spotted owls live in forests characterized by dense canopy of mature and old-growth trees, abundant logs, standing snags, and live trees with broken tops. **Although they are known to nest, roost, and feed in a wide variety of habitat types**, spotted owls prefer older forest stands with variety: multi-layered canopies of several tree species of varying size and age, both standing and fallen dead trees, and open space among the lower branches to allow flight under the canopy. **Typically, forests do not attain these characteristics until they are at least 150 to 200 years old.**

From: "Nest trees of northern spotted owls (*Strix occidentalis caurina*) in Washington and Oregon, USA". Published: May 31, 2018:

Nests of NSOs have been described in many areas of their range, including Oregon [8, 15], Washington [15–18], and northern California [19, 20]. **Nesting by NSOs primarily occurs in hollow cavities or in external platforms in conifer trees infected by dwarf mistletoe (*Arceuthobium* spp.).** Nesting on cliffs has been documented, but is rare [8, 21]. Nest site selection appears to depend primarily on availability of large, old trees and protective cover from predators and cold, wet weather during the early nesting season [8, 17, 18].

According to this science, the Forest Service needs to address adequately whether the ecology of Unit 129, **if left to its own natural designs**, has the potential for growing a forest that could in a long-term future accommodate northern spotted owl nests, habitat, and food source prey.

Huckleberry Enhancement

Moving on, I first want to commend the Forest Service for including the participation and cooperation of the Confederated Tribes of Warm Springs in decision-making and actions that concern cultural resources on what are traditional tribal lands in the Mt. Hood National Forest. That said, I also want to draw attention to Section 1.3.4 Other Opportunities of the PA Zigzag Integrated Resource Project:

*Certain areas have **huckleberry plants that are being shaded out by overstory conifers**. There is an opportunity to enhance huckleberry productivity by removing some of the trees along the Sheerer Burn Road (Road 2613). Huckleberries are an important 'First Food' for local Tribes, they are prized by recreational users, and they are an important food source for wildlife. The proposed action is to treat approximately 50 acres.*

I also want to reference the extensive "Preliminary Assessment: Huckleberry Enhancement"; Clackamas River Ranger District, Zigzag Ranger District, Mt. Hood National Forest, Clackamas County, Oregon; 2010.

This document's Section 4.13 Climate Change includes a five-point action plan on climate change – namely, Section 4.13.3 Direct, Indirect, and Cumulative Effects – with something of a lukewarm disclaimer thereof. The assessment does however clearly relegate any suggested impact of climate change to the science of carbon emissions and sequestration as selectively cited by the Service.

By contrast, "What We Know About Climate Change and Northwest Huckleberries": Northwest Climate Hub, USDA, features new evidence on climate change and its direct impact on huckleberries:

<https://www.climatehubs.usda.gov/hubs/northwest/topic/what-we-know-about-climate-change-and-northwest-huckleberries>

Among the Key Concepts of this Northwest Climate Hub page:

Higher seasonal temperatures could impact pollination and fruit production of huckleberry when flowering happens before pollinators (bees) are abundant...

*Forest managers can maintain huckleberry habitat with brush clearing and low-intensity burning that creates forest gaps, **while retaining overstory shade** and improving soil conditions. Techniques for managing evergreen huckleberry with fire have been developed by the Karuk Tribe....*

Among resources cited in the above-mentioned Northwest Climate Hub page:

“Bears, Berries, and Bees: The Implications of Changing Phenology; National Park Service;

<https://www.nps.gov/articles/bears-berries-bees.htm#9/48.4802/-113.7126>

Agricultural and Forest Meteorology; Volume 280; January 15, 2020

<https://www.sciencedirect.com/science/article/pii/S0168192319304198?via=ihub#!>

In the name of consistency, it would seem to be nothing less than valid protocol for the Forest Service to address this USDA science in its proposed action for Huckleberry Enhancement in the Zigzag Integrated Resource Project.

Climate Change

Concerning climate change: While the USDA Huckleberry Enhancement document, 2010, mentioned above, does present a limited perspective on carbon emissions and sequestration, it's interesting that the Climate Change Report for the Zigzag Integrated Resource Project, written a decade later, includes the exact same statement and 5-point plan of action. This seems negligent when considering 1) how much new science on carbon emissions and sequestration has been made available over the last decade, and 2) how current science on climate change typically addresses many other areas of impact.

Consider the USDA Forest Service document, Northwest Regional Climate Hub Assessment of Climate Change Vulnerability and Adaptation and Mitigation Strategies (2015).

Or since the Forest Service sometimes co-manages with certain state agencies and institutions, consider the *2018 Report of the Oregon Global Warming Commission*.

Once again, the Zigzag Climate Change Report concerns me for the way it fails to address fully available science on a full range of climate change impacts, including changes in precipitation, snow melt in transient snow zones, and flooding events. Such changes could have profound and long-term effects on erosion, the sediment levels in streams, and subsequent impact on the health of aquatic life and habitat, not least of as regards the steep slope topography and water quality conditions of the Clear Fork, a stream that is listed as critical habitat for steelhead and other aquatic species. Since proposed riparian thinning will not significantly improve desired aquatic habitat, as the Zigzag PA states, it is clear that this thinning action is being done first and foremost to enhance future silviculture development and harvest but without adequately addressing available science on the future impacts of global warming.

Subsequently in brief, one is forced to ask by what scientific metric does the Service assign the conclusion that a prescribed action's "contribution to cumulative effects on global greenhouse gasses and climate change would be negligible" when that general reasoning is applied over the years to USFS projects again and again.

Recreation Culture and Economy

While the Zigzag PA includes many measures to maintain and enhance Visual Quality Objectives and Scenic Integrity Objectives, I must question whether the Forest Service has adequately researched and profiled the broader ecological concerns of contemporary recreation-seekers. While the Zigzag PA has calculated the small economic contribution the prescribed action makes to the local timber industry, I must question whether the Forest Service has adequately researched and profiled the broader economic impact of a high-visitation recreation area that is being re-opened to logging after a 20-year hiatus.

Finally, it is my sincere hope that the Zigzag PA process will answer all questions and concerns raised by public comments in a manner that directs Forest Service funding toward the best effective stewardship of our national forest. I am also hoping that all activities including planning for the Zigzag or any other Mt Hood National Forest sales be resubmitted to the Biden administration before exercising any timber harvest activities or contracts.

For these reasons, I believe this project fails to take “hard look” at its potential impacts as required by NEPA and would cause significant harm to the environment if it proceeds as planned.

I would welcome a productive pre-decisional objection resolution meeting with MHNF staff. If you have any clarifying questions about this objection, please don't hesitate to contact me.

Thank you,

Melanie Farnsworth

Rhododendron, OR