Data Submitted (UTC 11): 9/30/2019 11:00:00 AM
First name: Mia
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Organization:
Title:
Comments: 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 [sect]218, I object to the Environmental

Assessment ("EA") and draft Decision for the North Clack Timber Sale.

Location: North Fork Clackamas River Watershed, Clackamas River Ranger

District of the Mt. Hood National Forest in Clackamas County, Oregon.

Objector's Interests: I visit and use the forests of Mt. Hood frequently, and

depend on these forests for drinking water, air quality, and climate stabilization

via carbon sequestration. I have extensively examined many units of this

proposed timber sale, and submitted comments on the Proposed Action.

Requested Relief: I request the following relief:

[bull] Modification of proposed variable-density on 4,219 acres

[bull] Elimination of proposed regeneration harvest on 314 acres

I submit this Objection for the following reasons:

In my PA comments, I addressed the known impact of variable-density thinning

and regeneration harvest on atmospheric carbon dioxide, and provided citation

from The Oregon Global Warming Commission 2018 Forest Carbon Accounting

Project Report. This report relies heavily on data provided by the USFS. In

summary, this report concludes that: "Based on credible evidence today, forest

harvest does not appear to result in net carbon conservation when compared to

carbon retention in unharvested forests[hellip]Current analysis suggests that treatments which include medium to heavy thinning result in reduced carbon stores that do not recover in any meaningful time periods."

The author of the Draft Decision states the following, in response to PA comments:

"I have decided that a quantitative carbon analysis is not appropriate at the project scale. Carbon sequestration is only one of the many important values and uses of the Forest[hellip]. I have reviewed the science and I believe there are far too many disagreements regarding the assumptions and unknowns about the factors that would go into a quantitative analysis that would render the results speculative." (p. 11)

Other commenters may have requested a project-wide quantitative carbon analysis, but I did not. The evidence presented in the OGWC report cited above, based on data supplied by the UFSF, among other sources, is sufficient. The author of the Draft Decision refers to "disagreements and unknowns," in regard to carbon sequestration. Climate science reports available to the general public are unanimous and unequivocal: urgent and immediate action is necessary at every scale, worldwide.

Far from addressing this urgent need, the selection of Alternative 2 actually accelerates the global climate crisis by increasing the acres of regeneration harvest. Responsible forest management precludes actions that directly contribute to rising levels of atmospheric carbon dioxide.

I believe that the real reason for the selection of Alternative 2 is stated in the PA, at the end of section 3.1.3.2 (Action Alternatives): "The proposed action would generate up to 45 million board feet of viable commercial timber products while Alternative 2 would generate approximately 5 million board feet more."

If the author of the Draft Decision really believes that there is any scientific

debate regarding the importance of proforestation for climate stabilization, I request that the author of the Draft Decision present data in support of timber harvest as a carbon sequestration strategy. Lacking such data, the response to the concerns I stated in my PA comments is inadequate and unsatisfactory.

For these reasons, I believe this project is inconsistent with its own Purpose and Need and would cause significant harm to the environment if it proceeds as planned.

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

Thank you,

/s/ Mia T. Pisano