

February 12, 2020

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Bill Westbrook Attention: Zigzag Integrated Resource Project Zigzag Ranger District
70220 E. Highway 26 Zigzag, OR 97049

RE: Zigzag Integrated Resource Project Scoping

Dear Bill,

I am writing with comments specific to the scoping process for the Zigzag Integrated Resource Project. I 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. Specific to this project area, I frequently hike from the Top Spur trailhead, around Ramona Falls, the Burnt Lake trail and areas around Trillium Lake. Because of this, I am concerned about many of the proposals contained in this project that could adversely affect the forest and the services it provides.

Steep Slopes, Unmapped Streams, and Legacy Snags

This past Fall, I've spent time visiting several of the proposed units in the Horseshoe and Mud Creek areas. One feature of many of the units I walked in the Horseshoe area is how steep the slopes are and the amount of water flowing through the forest. I am concerned that logging activities would destroy habitat, have high levels of erosion and increase sediment levels in the water. Of particular concern is that many of the units have legacy snags that are important naturally appearing landscape features. What documentation do you have of the snags throughout the Mud Creek and Horseshoe units? How will you ensure these snags are preserved?

In looking at the layers on the story map, I am also concerned that not all of the streams are included. The picture below was taken from just outside Horseshoe Unit 24, showing a stream that appears to be unmapped.

10/31/2019 45.392, -121.838



The picture is looking upstream, into Unit 24. The stream is flowing WSW. Elsewhere in Unit 24, there is a clearing with an intermittent stream feature that doesn't appear to be mapped. This example is just one unit, and with steep slopes and the potential for many unmapped streams, I am concerned about the ecological harm from logging in the area. More studies of the area should be conducted, particularly in the Spring and Fall months, and adequate buffers should be in place for any disturbances, or the units dropped altogether.

Desired Characteristics Already Present

In both Mud Creek and Horseshoe, I found a great diversity of species and several areas with older trees. These areas display ideal conditions for the forest and do not appear to need active management to reach their desired state. Some units I visited that are under this category are Mud Creek 181, Horseshoe 86, Horseshoe 6 and Horseshoe 18.

9/19/2019 45.392, -121.847 Unit 18



These units have a healthy mix of age, size, canopy, downed trees, snags, and there is a demonstrated complexity in the fungi community. In places where desired characteristics are already present, how is disrupting the area conducive to forest health? What studies are you relying on to indicate that any action is needed?

Impact on Recreation Areas and Local Economies

Many of the units are adjacent to recreational areas and the impact to trail users and local economies should be carefully considered. The recreation opportunities are essential for the well-being of Oregonians and provide significant income to local communities. As part of your analysis, what are the economic impacts to the local communities from anticipated lost visits to the affected areas? What are the underlying assumptions used in your modeling for how this figure is quantified?

Riparian Reserves and Wild and Scenic Rivers

The Zigzag Ranger district has done a commendable job investing in projects to enhance the rivers and streams in the area. My concern is that building roads, reopening decommissioned roads, logging on steep slopes, and erosion from the project will damage the streams and hurt the conservation legacy that the Zigzag Ranger District has been building. You should scrutinize the impacts this proposal has on the watershed, which is critical habitat for listed species, and remove logging and road building that could be detrimental to these areas. For logging within Riparian Reserves, what kinds of machinery will be in the area and how close will it get to streams and rivers? How will you quantify the potential damage? What science are you relying on that indicates the variable density thinning with skips will lead to the desired characteristics? What information are you relying on to show that this logging is necessary to improve habitat and water quality?

Forest Productivity to Store Carbon

Many sections of the units display characteristics of late-successional and old growth forests ideal for carbon sequestration. A hard look should be taken at the role of Mt Hood National Forest in fighting climate change. While the current Mt Hood National Forest Land and Resource Management Plan (Mt Hood Forest Plan) and Northwest Forest Plan (NW Forest Plan) may not specifically call for an analysis or prescribe how to quantify the climate change impacts, these plans are over 20 years old. How are you quantifying the carbon emissions of this project and its contribution to climate change? What kind of productive value are you placing on these units and their existing ability to sequester carbon? How are you incorporating current science into your planning that wasn't around when the Forest Plan and NW Forest Plan were implemented?

I look forward to your responses and your continued research and surveys on the ground to better understand the current conditions of these project areas.

Sincerely,

Tom R. [REDACTED]