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February 11, 2020

To: Bill Westbrook, District Ranger, Zigzag Ranger District
James Roden, Timber Sale Planner
70220 E. Highway 26
Zigzag, OR 97049
(541) 383-4770

Re: Zigzag Integrated Resource Project

Dear Ranger Westbrook,

I am writing to express concerns and raise questions about the proposed Zigzag Integrated Resource Project. I am a Portlander who loves visiting and learning from the forests on Mt Hood, and appreciates the vital role they could play in climate and fire resilience. I am an avid student of ecology and history of the area, and appreciate all the forest dynamics I've been able to witness firsthand in the Mt. Hood National Forest.

I see the forest as an unparalleled resource for learning, as well as for clean water, habitat for countless species, medicine, food and other traditional cultural resources, recreation, and carbon sequestration in the face of climate change. I have visited areas within the Zigzag project, specifically the Horseshoe area. I could only interpret the stands I saw there as functioning ecosystems which would be harmed, not helped, by industrial logging as proposed in the Zigzag Integrated Resource Project. From my visits, and from my understanding of the project in general, I have a number of concerns and questions.

Habitat degradation:

I have surveyed units in late fall and winter and found riparian areas and streams not on project maps. If Forest Service surveys were done in the summer, how will they account for larger riparian areas existing in winter? And both in riparian areas and in the greater forest, I have seen evidence of rare and sensitive species. Especially for Survey and Manage species, I'd like to know what the Forest Service's method of surveying is, and what your cutoff is for calling it complete. How will you make sure logging is not harming sensitive habitat?

I am also concerned about habitat degradation downstream from logging, including areas which have been restored on the lower Sandy. In the Sandy and Salmon rivers, how will downstream effects of logging be assessed? Similarly, are you accounting for erosion and stream degradation from the 10.6 miles of planned road construction? How will you address degradation from these and other sources associated with logging?

Thinning:

As an Oregonian concerned with the effects both of wildfires on people, and fire suppression on forest health, I am concerned with the amount of thinning proposed in this project. Based on recent studies (such as Bradley, C, CT Hanson, and DA DellaSala, 2016; Barnett, Kevin, Sean A. Parks, Carol Miller, Helen T. Naughton, 2016) logging forests does not help mitigate fire intensity, and could instead exacerbate it. This will only be compounded by the effects of climate change, creating less capacity for water storage capacity and drier forests. I would ask you to reconsider thinning prescriptions, or at the very least provide documentation of your reasoning, in line with the latest science.

Huckleberry enhancement:

I am concerned about the acres designated for “huckleberry enhancement”: I can find no reference to conference with any tribe about this treatment. Who, if anyone, have you contacted, and are there plans to make it feasible to harvest huckleberries in the enhancement? Since fire, not logging, was the traditional method of huckleberry management (and especially because fire has been overly-suppressed in the past century) why did you choose to manage by logging now?

Climate Change:

Recent studies by both OSU and the Oregon Global Warming Commission have found Oregon forests hold significantly large carbon stores, with the potential to store much more with changes in forest practices. Forests also have the potential to release enormous amounts of carbon through industrial logging. Based on these findings highlighting the central importance of Oregon's forests to carbon sequestration and therefore climate trajectories, why are you not considering climate change in the NEPA process? I'd like to see both carbon emissions and the loss of carbon sequestration capacity assessed for this project. Overall, going forward I hope that the forest's function in carbon sequestration and protecting against the effects of climate change is valued and prioritized.

I am also concerned about this project as part of a larger reality in which logging projects take place every year on Mt Hood. How will you account for the compounding effects of this project? Since this project is one of many on the mountain, it doesn't make sense to measure its impact outside the context of the whole forest/region/globe. For instance, I want to know the overall acreage of mature forest in MHNF (which has the potential to transition to old growth ideal for both carbon sequestration and climate refugia), how much throughout the forest could be under threat in the next 50 years, and how individual projects take that into account when deciding where to log. How is this project being considered in the context of all logging in the national forest?

Overall, I encourage the Forest Service to take the latest fire and climate science into consideration, and pursue a plan to accomplish project goals with the least environmental effect. There is a great opportunity to manage this forest to restore equilibrium and add resilience to the land, and I hope the Forest Service takes it.

Thank you for hearing my concerns,
Llewyn W [REDACTED]