



October 22, 2012

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USDA Forest Service
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VIA EMAIL: appeals-pacificnorthwest-regional-office@fs.fed.us

RE: Administrative Appeal of Jazz Thinning Project

Appellant:
American Forest Resource Council
5100 S.W. Macadam Avenue, Suite 350
Portland, Oregon 97239
Tel: (503) 222-9505
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www.amforest.org

Appellant's Designated Representative:
Irene Jerome
AFRC Representative, Eastern Oregon/SW Idaho
408 SE Hillcrest Rd
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This is an appeal of the Decision on the Jazz Thinning Project. The date of the Decision Notice and Finding of No Significant Impact is August 30, 2012. The responsible official making the decision is Chris Worth, Forest Supervisor of the Mt. Hood National Forest. The name of the project is the Jazz Thinning hereafter referred to as Jazz.

AFRC provided preliminary assessment comments on Jazz on December 19, 2011.

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APPELLANT’S INTERESTS:

AFRC represents over 60 forest product businesses and forest landowners in five states. Our mission is to create a favorable operating environment for the forest products industry, ensure a reliable timber supply from public and private lands, and promote sustainable management of forests by improving federal laws, regulations, policies and decisions that determine or influence the management of all lands. The forest industry in Oregon, including the sawmilling infrastructure and all the associated support activities, is currently seriously stressed. Many mills are operating at 65% of capacity at this time, with raw materials supply being the major factor limiting operations. The appellant’s interests will be adversely affected by the decision made for this project.

PURPOSE AND NEED

The purpose and need of this project as stated in the Environmental Assessment (EA) is

“ . . .to enhance the productive capacity of mid-aged stands in the Collawash watershed in order to provide for the sustainability of resources and forest uses as prescribed by the Forest Plan as amended. . .

“[1] There is a need to increase health and growth of stands because mid-aged stands within the project area are experiencing a slowing of growth due to overcrowding and some are experiencing suppression caused mortality. . .

“[2] There is a need for greater variability of vertical and horizontal stand structure because mid-aged stands within the project area do not have a mix of tree species that were present in the original stand and they are relatively uniform in terms of tree size and spacing. Also, there is a need for more sunlight on the forest floor to create greater diversity of ground vegetation. . .

“[3] There is a need is to keep forests healthy and productive to sustainably provide forest products now and in the future. (Northwest Forest Plan ROD p. 26, Forest Plan p. Four-26). . .”

EA, section 1.3, pages 17—18.

SPECIFIC APPEAL POINTS

A. SCOPE OF PROJECT IS INSUFFICIENT TO MEET NEEDS 1, 2 and 3

The Mt. Hood National Forest is approximately 1.1 million acres. The Clackamas Ranger District is approximately 414,700 acres. The Collowash watershed is approximately 97,000 acres. The Jazz project area is 2,053 acres. Actual on the ground vegetation management will occur on 1,588 acres. These on the ground projects that will enhance ecological health of this watershed represent 77 percent of the project area. However, on the ground treatments represent

only 1.6 percent of the Collowash watershed, which is 0.3 percent of the Clackamas Ranger District, or 0.1 percent of the Mt. Hood National Forest. Sufficient acreage is not being treated to make any meaningful difference in the ecological enhancement of this watershed as described in needs 1 and 2. Additionally, the amount of wood fiber removed will not be sufficient to adequately meet need 3.

B. SCOPE OF PROJECT IS INSUFFICIENT TO MEET AQUATIC CONSERVATION STRATEGY OBJECTIVES 1, 8 AND 9

The Aquatic Conservation Strategy (ACS) of the Northwest Forest Plan (USDA and USDI 1994) was developed to restore and maintain the health of watersheds and aquatic ecosystems. The ACS objectives are detailed on page B-11 of the Northwest Forest Plan. (EA section 3.3.4.7, p. 79.) The Jazz project will implement resource enhancements in riparian reserve areas. However, the actual number of acres that will be treated in those reserves is so small that effects will be negligible. The EA states that these openings are limited to ¼ acre in size, which will eliminate potential opportunities on the ground to further enhance the diversity of vegetation in these riparian reserves while meeting other objectives such as enhancing forest health. For example, treatment of root rot pockets in the riparian reserves would be limited to the ¼ acre restriction when the most desirable silvicultural treatment to mitigate the spread of root rot into the stand might be to create an opening that is ½ acre in size.

The actual acreage of treatment in the riparian reserves is not defined in the EA. However, the Jazz watershed map shows the units in the Jazz project including the areas that will be in riparian reserves. In order for the project to “accelerate the restoration of late-successional conditions and reduce fragmentation” and to “create diversity and complexity” as described under ACS1, sufficient acres must be treated to actually make a difference in the watershed. The EA estimates that approximately 24,600 acres of the Collowash watershed were harvested during the last century and are now in plantations of various ages. The Jazz project has actual resources treatments on 1,588 acres and much less in riparian reserves. This is too little to make a significant difference.

Further, although the riparian reserve areas are moist environments and fire frequency ranges from 50 to 200 years, when fires do burn through these areas overstocked even-aged plantations are extremely vulnerable to complete destruction due to the touching crowns and the abundance of needles and other fine fuels. Insufficient thinning to riparian plantations may lead to total destruction of entire streams and watersheds resulting in far more detrimental and long term effects to these riparian areas than the short-term impacts of vegetation management.

C. INSUFFICIENT EARLY SERAL HABITAT IS BEING CREATED FOR ELK AND DEER

“Deer and elk were selected as management indicator species because they are economically important game animals. Deer and elk utilize early-successional forest habitat for foraging along with their use of forest stands for cover.” (EA section 3.8.3.4, p. 137). “With the reduction in timber harvest on the Forest in the past two decades and continued tree growth, cover habitats now

far exceed the desired levels for optimal and thermal cover but openings for forage are becoming scarce. Currently 13% of the Collawash watershed in early-seral habitat and that figure is declining each year. As the change in forest management has moved from widespread regeneration harvest to selective thinning, past harvest units have grown a thick stand of young trees that shade out the grasses and forbs used as forage for deer and elk.” (EA section 3.8.3.4, p. 138)

Once again the small scope of the Jazz thinning project limits significant opportunity for creating early seral habitat. With only 13% of the watershed currently providing early seral habitat and that habitat declining every year, deer and elk forage habitat will continue to decline. This further emphasizes the need to increase the acres treated on the Jazz project as a whole and to increase the size of the gaps implemented, both within and outside of the riparian areas. Vegetation is increasing and early seral habitat declining faster than openings are being created through insects, disease, and vegetation management combined.

SUMMARY

AFRC finds that the Forest Service has not met the purpose and need of the Jazz Thinning project for the following reasons:

- **PURPOSE AND NEED IS NOT MET**
 - The number of acres being treated on the Jazz project is not sufficient to meet the purpose and need.

- **PROJECT DOES NOT MEET ACS OBJECTIVES 1, 8, AND 9**
 - The number of acres being treated in riparian areas on the Jazz project is not sufficient to meet Aquatic Conservation Strategy objectives 1, 8, and 9.

- **PROJECT DOES NOT ADEQUATELY INCREASE EARLY SERAL SPECIES FOR Management Indicator SPECIES DEER AND ELK**
 - The number of acres treated, including gaps created, is insufficient to reverse the trend of declining early seral species in the Collowash watershed.

AFRC contends that the Forest Service was arbitrary and capricious in the development of the preferred alternative by not treating enough acres in the planning area to meet the purpose and need of the Jazz Thinning project. The 2,053 acres on the Jazz project are spread over 5 townships and 36 sections and ample opportunity exists to increase the size of the project without significantly impacting the watershed.

REQUESTED RELIEF

AFRC requests that additional acres, equivalent to approximately 50% of the early and mid-aged stands in the Collowash watershed, be treated with the Jazz Thinning Project.

RESOLUTION MEETING REQUESTED

AFRC requests a dispute resolution meeting pursuant to 36 CFR 215.17.

Jazz Thinning Appeal

October 22, 2012

Page 5

In the event multiple appeals are filed on this decision, AFRC respectfully requests that the resolution meeting be held as soon as possible with all appellants present. AFRC believes that having all appellants 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.

Thank you for your efforts on this project and your consideration of this appeal. AFRC looks forward to our initial resolution meeting within the next two weeks. Please contact our representative, Irene Jerome, at the address and phone number shown above, to arrange a date of the resolution meeting.

Very truly yours,

A handwritten signature in cursive script that reads "Tom Partin". The signature is written in dark ink and is positioned below the closing "Very truly yours,".

Tom Partin
President

cc: Chris Worth, Mt. Hood National Forest Supervisor, Responsible Official
Irene Jerome, Appellant's Designated Representative