


11/09/2020

Mia Pisano


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 visit and use this part of the forest for recreation, I depend on the forests of Mt Hood for clean drinking water, and I depend on the forest for sequestration and storage of atmospheric carbon dioxide. I submitted comments on the Preliminary EA. I visited and made extensive observation and data collection in the following units of the project: 62, 178, 176, 175, 174, 148, 146, 330, 332, 190, 192, 194, 196, 130, 132, 129, 306, 128.

Requested Relief:

- Complete and disclose a full analysis of impacts, as is required by NEPA, related to climate change, including conducting a quantitative carbon analysis
- Increase the percentage area to be retained in skips, in all units proposed for VDT
- Modify the Vegetation Management Actions to preserve all important areas and features that have been identified by IDT specialists
- Further develop PDCs to address all the risks identified in the Botany Specialist Report regarding invasive species spread
- Modify the Vegetation Management Actions to eliminate VDT in Riparian Reserves

I submit this Objection for the following reasons:

In my comments, I raised concerns and submitted evidence in the following areas.

- Vegetation Management Actions:
 - VDT in plantation-origin Matrix with 5% skips
 - Need to Buffer Important Areas and Features
 - VDT in Riparian Reserve upslope areas above listed fish habitat
- Carbon/Climate Impact Considerations
- Absence of Alternatives
- Integrity of Process

For each area of concern, I provided specific data, cited recent scientific research, and identified inconsistencies within the Forest Service’s own documentation. The Forest Service has not

shown in the EA that any of the public comments submitted have resulted in any modification in the project. The Forest Service has also repeated, in response to public comments, the sentence, "*The science that was cited by some commenters as well as other literature on the subject was considered,*" numerous times, without providing any evidence of engagement with this science.

From my comments:

Of the science cited in the Preliminary Assessment Climate Change Report, none is more current than 2014. Despite commenters providing numerous sources of current scientific evidence, the Preliminary Assessment addressed none of these sources of current evidence. Specifically, the Preliminary Assessment failed to address, consider, engage, any of the science contained in the Oregon Global Warming Commission – 2018 Forest Carbon Accounting Project Report.

"The cited science has been considered along with that science cited in this report. That consideration is documented in the administrative record." (Climate Report, p. 4, Consideration of Scoping Comments, p. 3)

At no point in the Preliminary Assessment or the Consideration of Scoping Comments is that consideration presented. **I request documentation of the details of the agency's consideration of the cited science, which is not currently evident in the administrative record.**

The agency concludes the Consideration of Comments with this statement (italics mine):

"Although the exact particulars of each recommendation are not responded to individually, the *interdisciplinary team has considered the current science* and made a valid proposal that moves the landscape in an appropriate direction, consistent with the Forest Plan, law, regulation and policy."

However, at no point in the EA, or in the Consideration of Comments, is this consideration of current science present. The agency continues to state that current science has been considered, without any evidence of that consideration.

At this time the administrative record continues to show no evidence that the agency has engaged with any recent climate science. The response in the EA is not satisfactory.

In my comments I raised concerns regarding proposed Vegetation Management Actions, specifically: percentage of skips in Matrix VDT, buffering all important areas and features, VDT in Riparian Reserves, and spread of invasive plant species. The response in the EA is not satisfactory.

In my comments I raised concerns regarding the absence of alternative actions. The EA only considers action/no action, with no response to the alternatives suggested by commenters. This response in the EA is not satisfactory.

In my comments I raised concerns regarding the failure of the agency to conduct this Environmental Assessment in integrity and good faith. The response in the EA is not satisfactory.

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.
- Fails to meet its Purpose and Need regarding increasing diversity and gaining greater variability of vertical and horizontal stand structure.
- Fails to meet its purpose and need of improving Aquatic/Riparian Habitat.
- Fails to consider reasonable alternative actions presented by the public.

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,

/s/ Mia Pisano