



9th November

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: French’s Dome in the Horseshoe Area, Zigzag Ranger District, Mt. Hood National Forest

Objector’s Interests: I represent a charity that is focussed on protecting climbing resources in the portland area.

Requested Relief:

- Disclose the details on the visual impact analysis that was performed for location H3.1
- Disclose further information as to the timing and scale of impact to access at French’s Dome

Portland Area Climbers Coalition

The Portland Area Climbers Coalition (PACC) is a registered 501(c)(3) non-profit that is donation-based and member-driven whose mission it is to secure and maintain long-term access to climbing crags within two hours of Portland, Oregon.

Viewshed Impact

In our letter submitted in the most recent round of comments we raised specific concerns over how the viewshed impact analysis was performed at site H3.1, better known as French's Dome. We were concerned over the location and direction of the analysis and that it did not represent the typical viewpoint for users of the site. We requested that the analysis was reconsidered and the support data such as photographs were disclosed. This information has not been published in either the DN or EA. The only comments as to the impact of variable thinning was:

*"The thinning that would occur in viewsheds was carefully designed to be consistent with visual quality objectives. I believe that the minor alterations to scenery would not likely cause anyone to stay home or recreate elsewhere outside the mountain zone."*¹

While it may be true that people will continue to use the area if the views are impacted it does not negate the fact that it may have a significant impact to the quality of the recreational activities available. Once again we ask for further detail on the analysis performed at Site H3.1 to verify that it truly reflects the common viewpoint at the top of the dome. Finally we ask for examples of what a partial retention visual quality objective will look like. I find it hard to believe that logging in unit 4 can be performed while maintaining the required VQO/SIO.

Recreational Impact to French's Dome

No detail has been provided as to the planned timing of impacts to the developed recreational site at French's Dome. Once again we ask for further detail regarding the timing and scale of closures in the unit 4 region.

* * *

Thank you for your consideration of these objections to the Environmental Assessment and Decision Notice on the proposed Zigzag Integrated Resource Project. I look forward to continuing to work with you.

Sincerely,

A handwritten signature in black ink, appearing to read 'MA', is written on a light blue background.

Michael Ardron- Portland Area Climbers Coalition

¹ https://www.fs.usda.gov/nfs/11558/www/nepa/112557_FSPLT3_5357910.pdf Page 7