

From: [Lloyd Vivola](#)
To: [FS-objections-pnw-mthood](#)
Subject: RE: In accordance with 36 CFR §218, I object to the Environmental Assessment ("EA") and Draft Decision for the Zigzag Integrated Resource Project.
Date: Monday, November 9, 2020 8:21:37 PM

November 8 2020

Lloyd Vivola


To: Richard Perlman
Forest Supervisor & Objection Reviewing Officer
Mt. Hood National Forest
16400 Champion Way
Sandy Oregon 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: As a resident of Portland OR I visit the Zigzag Ranger District regularly for nature-appreciation hiking and wildlife-tracking surveys with Cascadia Wild not least of all in the upper Sandy River watershed and Trillium Lake area. I also serve as a watershed restoration volunteer and Outreach Committee member in Portland with the Johnson Creek Watershed Council.

Requested Relief: Complete and disclose a full analysis of impacts as is required by NEPA related to climate change

I submit this Objection for the following reasons:

I am troubled that the Draft Decision for the Zigzag Integrated Ranger District fails to address climate change in a way that is consistent with NEPA and in ways that are current with a growing number of court decisions regarding cases filed against United States federal agencies. Accordingly I am troubled that the Forest Service did not offer any substantial analysis of climate change issues that I raised as a commenter during the PA process.

Specifically with the project at hand I think the Forest Service is ignoring a science-based analysis of what could be foreseeable cumulative impacts by and potential consequences of climate change 1) in the upper Sandy River watershed or Horseshoe section of the Zigzag project where thinning of trees in riparian terrain – like the steep slopes around Clear Creek – could cause increased erosion and hamper aquatic wildlife enhancement as changes in flooding precipitation and snow melt become more problematic with warming seasonal temperatures in the future and 2) regarding plans for huckleberry enhancement in the Mud Creek section of the ZigZag project where the Draft Decision fails to address the emerging science that shows how warming temperatures due to climate change can impact pollination of huckleberry plants.

It also seems clear to me that a failure to address cumulative causes or impacts of climate change in these or any project would limit the alternative actions devised by the Forest Service. For instance might a cumulative climate analysis of the Clear Creek units consider a thinning project that is specifically designed to a long-term old growth restoration project - as has been done in Siuslaw National Forest – or one which would better guarantee aquatic wildlife and habitat enhancement.

Finally the Forest Service fails to address a point I raised in my comments during the PA process: By what scientific metric does the Service assign the conclusion that a prescribed action's "contribution to cumulative effects on global greenhouse gasses and climate change would be negligible" or of "no significance" when that general reasoning is applied over the years to Mt. Hood National Forest projects again and again? If this is simply seen as consistent with a 30-year-old Mt. Hood Forest Plan that fails to recognize or address climate change I am forced to contemplate whether a Draft Decision of any project in MHNH is valid by the letter and spirit of NEPA as currently required.

Sources that I have researched and referenced:

12 Climate Wins From the National Environmental Policy

Act<https://www.americanprogress.org/issues/green/news/2019/05/29/470374/12-climate-wins-national-environmental-policy-act/>

Northwest Forest Plan – Aquatic Conservation Strategy<https://www.fs.fed.us/r6/reo/acs/>

Consideration Of Cumulative Impacts In EPA Review of NEPA Documents

<https://www.epa.gov/sites/production/files/2014-08/documents/cumulative.pdf>

Climate Change Considerations in Land Management Plan Revisions January 20, 2010

https://www.fs.fed.us/emc/nepa/climate_change/includes/cc_land_mgmt_plan_rev_012010.pdf

The Legal Framework of the National Environmental Policy Act

<https://crsreports.congress.gov/product/pdf/IF/IF11549>

Climate Change Considerations in Project Level NEPA Analysis January 13, 2009

<https://www.fs.fed.us/climatechange/documents/nepa-guidance.pdf>

Oregon Global Warming Commission - 2018 Biennial Report to the Legislature

<https://static1.squarespace.com/static/59c554e0f09ca40655ea6eb0/t/5c2e415d0ebbe8aa6284fdef/1546535266189/2018-OGWC-Biennial-Report.pdf>

Cumulative Effects and Climate Change – USDA/USFS

<https://www.fs.usda.gov/ccrc/topics/cumulative-effects>

Huckleberry Enhancement - Clackamas River Ranger District, Zigzag Ranger District, Mt. Hood National Forest, Clackamas County, Oregon

https://ecoshare.info/uploads/ccamp/synthesis_paper_tools/huckleberry/USDA_USFS_2010_Huckleberry_Enhancement_EA.pdf

What We Know About Climate Change and Northwest Huckleberries – Northwest Climate

Hub <https://www.climatehubs.usda.gov/hubs/northwest/topic/what-we-know-about-climate-change-and-northwest-huckleberries>