Bark’s mission is to transform Mt. Hood National Forest into a place where natural processes prevail, where wildlife thrives and where local communities have a social, cultural, and economic investment in its restoration and preservation.

Since 1999, Bark has organized people from communities around Mt. Hood National Forest to keep watch over the ecological conditions of the forest and the actions of the federal agency tasked with managing these public lands, the Forest Service.
The National Environmental Policy Act (NEPA) was passed by Congress in 1969 and signed into law on January 1, 1970. It became the first law to establish a national framework for environmental protection.
NEPA is intended to support environmental protection.

- Requires agency and public participation in planning process
- Requires disclosure about the action, alternatives, environmental effects, and mitigation
- Brings out environmental concerns of the affected public
- Requires environmental impacts to be considered during planning and decision making
- Results in informed and better decision-making (we hope)
NEPA Process Timeline

- **Scoping**
  - Submit your comments
  - 30 days

- **Preliminary Environmental Assessment (PA/ EA)**
  - Submit your comments
  - 30 days

- **Draft Decision / Proposed Action**
  - Submit your formal objection
  - 45 days

- **Objection / Resolution**
  - Agency must publish Objection Response Letter and hold a meeting (upon request) with Objectors to resolve objections, or explain why not
What is needed for effective NEPA comments?

Different things are needed for each purpose, and at each stage of the process.

1) Facts from the ground
2) Agency documents
3) Other scientific studies
4) The LAW
5) Other people’s comments!
### Why participate in a NEPA process?

1. To **change** the project
2. To **preserve** the ability to sue
3. To **gather** information about the project
4. As a focus-point for **organizing** the public
What is a Public Comment?

A written statement of official participation in the NEPA process, submitted by a member of the public, organization or other non-agency entity. The comment becomes part of the Public Record.

Not a general comment stating an opinion or asking a question to the Forest Service (or any Federal agency). It’s a formal legal comment regarding a specific document that is going through the NEPA process. It gains the commenter legal standing. (Does not guarantee that the commenter’s issues will be adequately addressed.)

**Substantive comments** can have significant impact, as opposed to opinions, which generally do not.
Substantive Comments
Do one or more of the following:

► Question, with reasonable basis, the accuracy of information in the EA
► Question, with reasonable basis, the adequacy of methodology for, or assumptions used for the environmental analysis
► Identify a different way to meet the stated need of the PA
► Present reasonable alternatives other than those analyzed in the EA
► Present new information relevant to the PA, an alternative, or the analysis
► Point out specific flaws in the analysis
► Make factual corrections, or identify a different source of credible research
► Cause changes or revisions in one or more of the alternatives.
Where am I?
Zig Zag Integrative Timber Sale

- Planning area is 16,000 acres
- One piece of the proposal is known as Horseshoe and is around Lolo Pass, Ramona Falls and Top Spur. The other is Mud Creek, with units all around Trillium Lake.
- Plans to log 2700 acres, in both young and old forests. That is 4 square miles of forest lost!
- Area contains habitat for threatened coho, chinook and steelhead
- There has been no logging in the heavily recreated Zig Zag district for over 20 years!
- Adds over 10 miles of Road
I remember when I first started gardening, and we moved onto what seemed like a pretty good size lot, about a ¼ acre. I was thinking I would never go to the grocery store again! Well, I am sad to say I was way off. BUT I found that it was ample space to grow all my family's medicine! I fact after living there for a few years I started offering a series of classes out of the space and found another 10 people could get their medicinal needs met too. I'll add growing medicine is like one million times easier than growing food. That is if you choose the right plants! A great place to start is with the story of the plants already in a space, cause we all have a story to tell. Chickweed for example, with those shallow roots tells you there are lots of nutrients and minerals close to the surface. In other words, might be a good place to start a veggie plot! Inversely plants like Yellow Dock or burdock will show up where the soils are heavy, clay and nutrient poor. These taprooted plants can mine deep into the soil seeking nutrients at a much greater depth. So a yard with a lot of these plants means a lot of digging and compost to loosen up these soils. Or if a garden has a community of plants like Teasel, Poison Hemlock and Wild Carrot! This is the community you will see growing along the railway tracks! Not a place you wanna gather food or medicine, and quite possibly a place where a lot of pesticides were used. Anyways before you start a garden, I strongly encourage you to research the plants that are already there! This community will tell you so much about what is going on there. I know once we have the space we are excited to get going, but if we have a better understanding of place we will have better ideas where to plant our babies. Designing Often when we buy a new plant, we ask ourselves does this plant want sun or shade, does it like its feet wet or dry. This should then prompt us to look around our space and see what a suitable location for our plant might best be. And remember to look at different times of year and day! The sun is much higher in the summer, you won't know where water is concentrated until we get a torrential rain. Some simple tricks if you know your plant likes it kinda shady, place it where it gets the morning sun and not the hot afternoon sun. This will also make life easier on plants that like their feet wet too. As hot afternoon sun will dry a place out much faster. Inversely those tropical plants will do much better on the west side where they do get that hot afternoon sun. I think it makes more sense and honors the life of the plant if we can ask ourselves where did this plant come from? What kind of ecosystem? And then can we mimic that kind of situation in our yard? Often with a few tweaks we can create some situations where our plants will thrive. And this is so much easier than trying to throw everyone together and then micromanaging their existence. Or planting two plants together that want radically different things and treating them the same so that they are both not getting their needs met. And if you learn that a plant grows say on a tropical island, well 99% of the time you can find another plant that does the same thing that's so much easier to grow. Cause if you are gonna grow a bunch of pain in the ass plants gardening might not be that much fun for you! Mediterranean Mints Raingardens Choose your weeds! \**Plant propagation**\ Layering can be accomplished by bending a low growing, flexible stem to the ground. Dig a shallow trench or use a landscaping pin to ease a section of the stem underground. Leave the remaining 6 to 12 inches above the soil. Bend the tip into a vertical position. Simple layering can be done on most plants. Willows are easy to do in early spring using a dormant branch, or in late summer using a mature branch. This works great for those culinary mints like Rosemary, Sage, Lavender and Thyme. Cuttings...
Zigzag Field
Horseshoe Potential Units, 12/10/2019

Legend

System Roads
Temporary Roads
<all other values>

Temp_Type
Existing Temp Rd
Existing Skid Trail
New Temp Rd Proposed

Stand
Fire Origin, 492.1 Ac
Plantation, 608.4 Ac

To Zigzag, OR

Sandy Fl

Lost Cr

CLEA K FORK

0 0.5 1 2
Miles
Zigzag Timber Sale Timeline

- **Public Scoping:** 30-day comment period
    - Comment Writing Workshop Jan. 31 3-6pm @ Hoodland Library, Welches.
    - Comment Writing Workshop Feb. 5th 6-8pm @ Bark office, Portland.
    - Bark About Hike April 12, 9-5pm Zigzag project area.

- **Preliminary Environmental Assessment (PA):** 30-day comment period
  - July 2020 (comments due August 12th)

- **Decision expected:** October 2020

- **Objection/Resolution**

- **Implementation in Spring 2021**
The Problem of Roads
**Degraded water quality:** Rainfall onto roads exacerbates runoff into the streams and rivers that provide drinking water, as well as five salmon species listed under the Endangered Species Act (ESA) that make their home in Mt. Hood National Forest.

**Less habitat:** In addition to degrading water quality in salmon bearing streams, roads fragment habitat for wildlife.

- Roads often act as corridors where vehicle help spread invasive plant species.

**Public safety concerns:** The sheer size of Mt. Hood’s road network creates public safety concerns. People can access isolated areas of the forest that are less accessible to emergency vehicles, and remote roads invite illegal dumping.

**Less access:** Although some people worry road closures will make it hard to get to their favorite spots, the reality is that the Forest Service’s budget is already spread too thin and can’t maintain all of its roads. That can leave culvert blow outs, slides, and other problems unaddressed and thereby restrict access to popular recreation destinations. By decommissioning unneeded roads, the Forest Service can focus its limited resources on maintaining the roads we use most to hike, swim, fish, gather mushrooms and more.

**Less wild:** Simply put, the more roads that remain on the landscape, the less wild the forest! Removing old roads can help the forest reclaim its wild character as well as help restore the creatures that rely on these landscapes.
Over 3000 miles of roads in Mt Hood!

**From the PA:** There would be no substantive cumulative effects to the road system because all projects that use roads also provide maintenance and repair commensurate with their use.
In 2010 through Increment 2 Bark worked to get 50 miles of road closed in the area! We even helped secure congressional funding and had volunteers planting Alder in some of these roadways!
Closed Road??
Culverts
Existing
Temporary Road

This project will create 3.9 miles of new temporary roads & reopen 2.7 miles of temporary roads from previous projects.
1828-125. This road was supposed to be decommissioned within the last 5 years. If it is not getting done through the Increment 2 proposal how are we supposed to believe it will happen this time? And in the meantime.....
Purpose and Need

1. to provide access to other proposed projects
2. to reduce resource risks
3. to reduce maintenance costs
4. providing appropriate and safe access to the Forest.
Check out chart from the PA
Other Resources to check out

Zigzag Integrated Resource Project Roads Table
Preliminary Assessment for the Zig Zag Integrated Resource Project
National Forest System Roads, Maintenance and Reconstruction
Forest Roads: A Synthesis of Scientific Information
Bark’s Scoping Letter
Bark’s Flickr Page
Substantive Comments do one or more of the following:

<table>
<thead>
<tr>
<th>Action</th>
<th>Description</th>
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<tbody>
<tr>
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Question, with reasonable basis, the accuracy of information in the EA

In section 1.3.2 the PA states there are 57 miles of road in the planning area while Section 3.2.2 notes there are 70 miles of roads in the Project area. Which number is accurate and which is being used to determine the road density, the ecological effects?

Question, with reasonable basis, the adequacy of, methodology for, the assumptions used for the analysis

The PA assumes that the contractor will follow through with their obligations for closing roads after the sale. We have seen time and time again, see Bark’s work on BMP monitoring here, that the contractor does not meet their obligations after the sale and that Forest Service does very little enforcement.
Identify a different way to meet the stated need of the PA.

It is stated in numerous places that we need to log to generate funding for roadwork. If instead we did not privatize all the campgrounds on the forest and used the trail fee monies might there be adequate funding for maintaining roads? Also if the road to Top Spur is closed for a season how is that “providing safe access”

Present reasonable alternatives other than those analyzed in the EA.

Given that this area is within listed fish critical habitat, and that presumably these roads were decommissioned to reduce impacts to aquatic species, we ask the FS to thoroughly develop an alternative that does not require building temporary roads in the Horseshoe area. (Bark Zigzag Scoping Comments, p. 51)
Point out specific flaws in the analysis
The PA states that the analysis continues to tier to the Travel Analysis Review (TAR) which was completed in 2015 as a guiding document. As one example, Road 1825-043 was deemed to remain closed in the TAR. This project would not only reopen but maintain the road in an open state after the sale. Again increasing Road density and a greater ecological and financial burden for the forest. This is not meeting the Purpose and Need for the project nor following the guiding document you created for a sensible road system.

Cause changes or revisions in one or more of the alternatives.
While I appreciate the effort of redefining what a Temporary Road is and the acknowledgement that the effects of such a road are NOT temporary, there was not the logical next step then that these roads should then be assessed when looking at the cumulative effects of All the roads in the area. Why are these roads not considered part of the system?
Organizing your Comment

- Use Descriptive HEADINGS: Structure your comment in thematic sections.
- Focus on Cause and Effect: If you allege that the NEPA document does or does not do something, clearly connect the dots.
- Provide as Much Factual Support as Possible: Include photos, maps, GPS coordinates, historical documents, scientific citations, studies, reports, etc.
- Point out Inadequacies: Failure to address some issue or failure to give high quality information.
- Focus on Environmental and Economic Impacts Separately
- Do not rant. Resist the urge! It weakens your argument and does not influence the proposed project in any way.
- Be Efficient. Make your points direct and succinct.

You don’t need to read the entire document. Focus on the discussion of effects for the issue you want to comment on, and utilize any maps or other appendices provided which clarify the information. Work in groups and share your findings so you don’t duplicate effort.
There has been some confusion over the use of the term ‘temporary road.’ In previous assessments, roads that were not system roads were referred to as temporary roads even though the road may have been constructed many years ago or the road was once a system road but had been decommissioned. The term ‘temporary road’ is contractual terminology and is used to describe non-system roads that are used by operators and have no planned need for public use. In today’s contracts, they are rehabilitated when project use is completed. There is no implication that the effects of these roads are temporary or that they would never be used again for future management. It is likely that road alignments built in appropriate locations on the landscape would someday be used again. The road locations are shown on the Zigzag Story Map. **Approximately 3.9 miles of new temporary roads would be constructed and approximately 2.7 miles of existing alignments would be reused.**