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Ashley Popham
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RE: Grasshopper Restoration Project Draft Environmental Assessment

Dear Ashley,

I am writing with comments specific to the Draft Environmental Assessment (EA) for the Grasshopper Restoration Project (the Project). I rely on Mt Hood National Forest for clean air, clean water, recreation for physical and mental health, and as a vital asset for mitigating climate change impacts through carbon storage.

Specifically for the EA, I am concerned about the impact of the Project on Northern Spotted Owl habitat, the impact of temporary roads, and the analysis about climate change.

Northern Spotted Owl Habitat

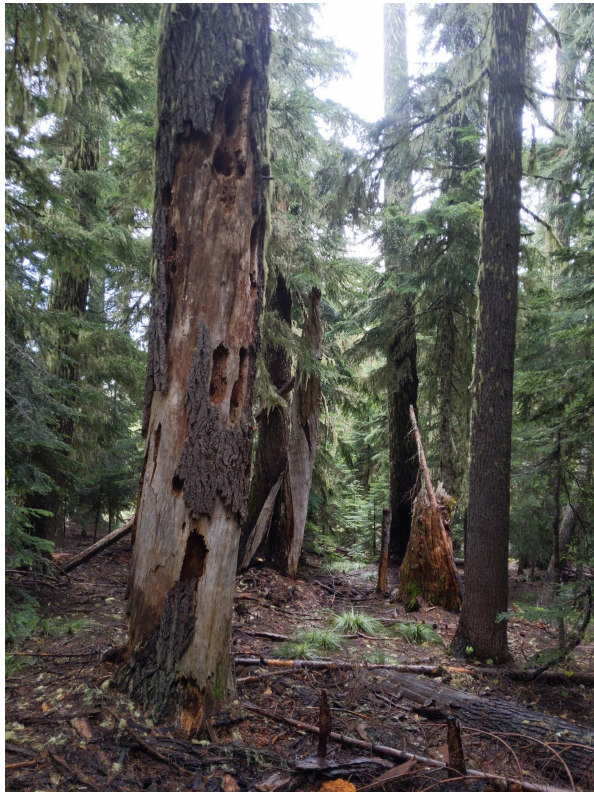
The project area along Road 4860 is especially concerning as it affects suitable habitat for Northern Spotted Owl (NSO). Given that the purpose and need is driven by dense stands caused by over management, degrading this NSO suitable habitat does not meet the purpose and need stated in the EA "to enhance, restore and protect wildlife habitat."

I understand that these units are included as Shelterwood within Alternative 2 as a proposed firebreak, and it is likely argued they are specifically addressing the stated purpose and need in the EA "to reduce risks associated with high-intensity wildfires." The premise that creating this fuel break will create the ability to control a high intensity fire should be re-examined. These high intensity fires will largely be wind driven and the fuel break will not impede a high-intensity fire; The White River Watershed Analysis (WRWA) discusses that when fires are pushed by a strong westerly wind even the White River will not provide a significant fuel break with the main method of fire spread is long-range fire spotting. *WRWA at 5-34*

This is mature, moist forest that is better able to withstand fire left unmanaged, and no action should be taken to preserve the suitable NSO habitat.

This is not to say that the community concerns of Wamic, Pine Hollow and Sportsman's Park surrounding fire are not warranted. Some prescribed burning in the eastern Grasshopper units and devoting resources to making these communities more resilient to fire should be a priority. However, logging in these western, mature forests will not improve fire outcomes and only serves to degrade NSO habitat and reduce the carbon storage of the area. Therefore at minimum Units 151, 163, 173, 191, 201, 219, 223, 272 should be dropped.

Mature Forest in Unit 223



Temporary Roads

The Draft EA estimates that there will be 17 miles of temporary roads but does not indicate where, even approximately, and does not indicate how many miles will utilize pre-existing alignments. Given the stage of project planning, it is highly unlikely that the Forest Service cannot give approximate locations and where pre-existing alignments will be used. The map indicating likely/unlikelihood of temporary roads is not helpful to assess the impacts of temporary roads.

Failure to include this information deprives the public the opportunity to meaningfully participate in this aspect and potentially improve the project. For instance, walking the area where temporary roads are proposed may uncover seasonal or unmapped streams or seeps, which may alter the project. If it is seasonal or underground, this may not be factored during implementation of the road building.

Additionally, if pre-existing alignments are used and it is found that these were previously temporary roads that had never been fully rehabilitated, it significantly calls into question just how temporary these roads will be. This is especially concerning given the network of OHV trails in the area. The first photo below documents OHV use off official trails near an unmapped stream in Unit 184, the next photo shows OHV use further east in Unit 184 where there are large boulders, were these set down to decommission a road? Is this an area where temporary roads will go through? Was this a prior alignment that should have been rehabilitated? We cannot comment and gather this information without knowing where temporary roads are expected.

OHV Use With Seasonal Stream- Unit 184





The EA indicates at 2.1.4 that temporary roads would be “rehabilitated as soon as practicable.” Can the Forest Service provide a commitment on what timescale that would be and what condition the alignments should be found? This should be a measurable result that someone could verify the rehabilitation was finished within the committed timeline.

Project Impact on Climate Change

The Climate Change report offers a neutral vision for the Project’s impacts on Climate Change; however, this is not definitively the case. There is much ongoing study about the importance of mature and old growth forest in storing carbon long-term. While there is no defined old growth within the project area, the best way to obtain and preserve any existing old growth characteristics is to let the mature forests we have grow undisturbed. If there is doubt and you are aware of science that indicates mature forests should be left standing, the best practice is to leave these forests alone, because we cannot repair them once they are disturbed (regrowth would not be the same moist mixed conifer).

Just North of Badger Creek wilderness, the Barlow Ranger District just put forth the South Five Mile Insect and Disease CE that was predicated on the need to treat forest based on past management activities. If you proceed with logging mature, moist forests, especially with Shelterwood under Alternative 2, you will dry them out, create conditions for dense regrowth, and where insects and disease could negatively affect the forest. Thus, you enter a cycle of

continual management, continual carbon release, and never meet are left with a forest that isn't healthy.

Conclusion

The proposed Grasshopper project is within a large planning area, with diverse types of forest and topography. While there are likely some benefits of the project to treat overly dense stands and use prescribed burning especially in the drier east portion, limiting the Alternative Actions to two is limiting. Accordingly, since this type of option is not offered, if Alternative 1 is chosen the high elevation mature forest units within Sutable NSO habitat should all be dropped (which by definition would remove Alternative 2 from consideration). This would also help address the concerns on the inadequacies of the Climate Change report to consider science citing the importance of leaving mature forests intact.

Thank you for considering these comments to the Draft EA for the Grasshopper Restoration Project.

Sincerely,

Thomas Russell