

October 16, 2022

Tom Russell
Portland, OR

Meta Loftsgaarden, Forest Supervisor, Objection Reviewing Officer
Mt Hood National Forest
16400 Champion Way
Sandy, OR 97055

RE: In accordance with 36 CFR §218, I object to the Environmental Assessment (“EA”) and draft Decision Notice for the Grasshopper Restoration Project.

Location: Barlow Ranger District of the Mt. Hood National Forest in Hood River County and Wasco County, Oregon.

Objector's Interest: I am an Oregon resident and rely on Mt Hood National Forest for clean air, clean water, recreation for physical and mental health, and as a vital asset for carbon sequestration.

In my comments submitted March 19, 2022, I highlighted concerns particular to Northern Spotted Owl (NSO) habitat, climate change and temporary roads.

I am objecting to the draft Decision Notice and FONSI on the basis of the mature forests and NSO critical habitat.

1. The EA indicates that this project is only affecting 0.5% of the Forest (Mt. Hood National Forest). This fails to take a hard look at the cumulative impacts of all the other projects in the Forest that are also impacting NSO habitat and mature/old growth trees.
 - a. A quick review of the other approved projects I am familiar with from the past few years, Zigzag, North Clack, Waucoma, various CEs. That impacted percentage of the forest grows quickly.
 - b. This also does not consider the impacts of logging on private, BLM, county and state lands.
2. Executive Order 14072 (4/22/2022) requires an inventory of mature and old growth forests, followed by public input on plans to “institutionalize climate-smart management and conservation strategies that address the threats facing mature and old-growth forests on federal lands.”

At a minimum, no action should be taken on mature or old growth units until the inventory required by this order is complete and a plan of action is in place.

Temporary Roads

I appreciate that a map indicating the likely positions of temporary roads was released to the public at the end of August 2022. I am disappointed that there was not more time to assess the locations. I understand there is a reliance on PDCs to mitigate impacts, but past projects have shown that the impacts of temporary roads persist in the Forest.

My comment on the draft EA included pictures of damage from OHV on old alignments. This indicates that the mitigation measures on the old roads were not adequate. I suggest for the temporary roads that there is some kind of performance bond in place to ensure that the roads are rehabilitated as required, within the designated time period. This would include Forest personnel surveying after the work is complete. Removing these access points to the Forest is critical to limit sources of disturbance and human ignition of fires.

Thank you for reviewing this objection and consideration of the proposed remedies as an option to improve the EA and the Grasshopper Restoration Project.

Sincerely,

A handwritten signature in black ink, appearing to read 'Th Russell', enclosed within a large, hand-drawn oval.

Thomas Russell