



July 17, 2023

Stephaney Kerley, La Grande District Ranger
Attn: Brianna Carollo
Wallowa-Whitman National Forest
3502 Hwy 30, La Grande, OR 97850

Submitted electronically <https://cara.fs2c.usda.gov/Public//CommentInput?Project=64101>

RE: 2022 Upper Grande Ronde River Mine Tailings Restoration

Dear Ranger Kerley,

I am writing on behalf of the Greater Hells Canyon Council (GHCC) regarding the 2022 Upper Grande Ronde River Mine Tailings Restoration project. GHCC is a non-profit conservation organization based in Northeast Oregon with over 2,000 members and supporters. We were founded in 1967 (as Hells Canyon Preservation Council), and our mission is to connect, protect, and restore the wild lands, waters, native species and habitats of the Greater Hells Canyon Region, ensuring a legacy of healthy ecosystems for future generations.

We appreciate the La Grande District's efforts in pursuit of this true restoration project. Please accept this letter in support of the 2022 Upper Grande Ronde River Mine Tailings Restoration project, with a few caveats.

We support the agency's stated need to improve natural riverine processes such as "sediment retention, transport and erosion processes, ground and surface water connection, water storage, habitat complexity, riparian vegetation vigor and recruitment, and nutrient cycling that is the foundation for a healthy food web" as well as the purpose of the project "to modify the river's channel in a way that promotes the return of these natural processes and restores healthy, productive aquatic habitat."

We appreciate the numerous aquatic restoration projects that have been ongoing in the Grande Ronde River and are grateful to the La Grande Ranger District and the other partners involved in these restoration efforts. We appreciate the positive benefits these projects contribute to the local economy as well as the ecological benefits to ecosystems of the river and adjacent uplands. We agree that the Upper Grande Ronde River was significantly impacted by historic mining and is in need of restoration. We are hopeful that these projects will benefit steelhead, salmon, bull trout, and a variety of other species dependent on quality habitat.

However, we notice that the Forest Service document describing the project appears to be silent regarding the NEPA analysis for this project. The project proposes relocating about one mile of road, replacing culverts, changing entry points to dispersed recreation sites, and potentially converting access to a dispersed recreation site to an OHV route. While projects like this will have long term benefits, they also come with some intense (though often temporary) effects. Has the Forest Service team analyzed this? A NEPA analysis through an Environmental Analysis (EA) process seems appropriate. Some discussion regarding this would be helpful and appreciated.





The project appears to be adjacent to (but just outside of) the Dry Beaver/ Ladd Canyon Elk Habitat Enhancement Area. The Elk Habitat Enhancement Area has been reported to have positive improvements for elk habitat and management including shifting elk use away from nearby private lands and onto the National Forest. These positive results have been achieved through travel management as well as habitat improvements.

We agree that maintaining public access to the dispersed recreation camp sites will be an important aspect of the Upper Grande Ronde River Mine Tailings Restoration project. However, it will be important that habitat considerations for elk and other wildlife will be protected from impacts of cross-country motorized travel and other potential negative impacts of motorized use. The Wallowa-Whitman National Forest is one of only a very few national forests that has not completed a Forest-wide Travel Management Plan.

We are concerned that access to one dispersed recreation site may be modified to accommodate OHV use because culvert removal on road 5138 would make the East Fork Grande Ronde River impassable to full size vehicles. Without a culvert, OHVs would be allowed to drive across the river by a ford. This would seem contrary to the purpose and need of the project to enhance natural riverine processes. Additionally, we are concerned about the potential for increased impacts from OHV use in the area that could result. Please address these concerns in the upcoming analysis. Thank you.

We would welcome any opportunities to further engage on this project, including a field trip to the area with staff. Please let us know if we can help find volunteers for planting or other projects during or after implementation.

We are very supportive of your efforts for quality aquatic restoration, improving connectivity of fish habitat, reestablishment of floodplain connectivity, and restoring wet meadows. Thank you for your work.

Sincerely,

Jamie Dawson

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