FROM: Doug Heiken, Oregon Wild | PO Box 11648, Eugene, OR 97440 | 541-344-0675 | dh@oregonwild.org

TO: LaGrande District Ranger, Wallowa-Whitman National Forest

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

CC; Sarah Brandy, [sarah.brandy@usda.gov](https://mail.google.com/mail/?view=cm&fs=1&tf=1&to=sarah.brandy@usda.gov&su=Upper%20Grande%20Ronde%20River%20Mine%20Tailings%20Restoration%20Inquiry%20(Project%2064101))

DATE: 28 May 2025

**RE: 2022 Upper Grande Ronde River Mine Tailings Restoration EA - comments**

Please accept the following comments from Oregon Wild regarding 2022 Upper Grande Ronde River Mine Tailings Restoration EA, <https://www.fs.usda.gov/r06/wallowa-whitman/projects/64101>. Oregon Wild represents approximately 20,000 supporters who share our mission to protect and restore Oregon’s wildlands, wildlife, and waters as an enduring legacy.

This project is intended to improve habitat conditions for ESA-listed fish species in the Upper Grande Ronde River and tributaries. Affected evolutionarily significant units include Snake River Basin spring/summer Chinook, Snake River Basin Summer Steelhead, and Columbia River Basin bull trout. Restoration activities include:

* Relocating roads currently located in riparian areas
* Cutting, moving, and placing large wood instream
* Culvert replacement in several locations to meet current standards for fish passage
* Channel and floodplain restoration along the Grande Ronde River and Clear Creek
* Placement of mine tailings in incised channels of the East Fork Grande Ronde River

Oregon Wild supports the intent of all these projects.

We support moving roads out of riparian areas, but recognize that mid-slope roads are not without trade-offs, such as: adversely modifying the flow of water, sediment, and wood from hill-slopes to the stream.

We support adding wood instream, but we recognize that this is a short-term mitigation, that removes valuable habitat trees from uplands and transports that woody structure to riparian areas. Importantly, real restoration of instream wood requires restoring healthy populations of large trees along streams so there is a supply of green trees from which to continuously recruit large wood instream. How will this project advance that goal?

As a general rule, large wood is better than small wood, but in small streams small wood can serve the biophysical processes of dissipating energy and forming pools, etc. And multiple pieces of smaller wood can collectively meet the goals of larger wood. Will the trees to be cut be larger than 21” dbh? Are there issues with Eastside Screens compliance? To mitigate the loss of large tree habitat in uplands, the Forest Service may be able to calibrate the number and size of trees to be removed based on the stream size, stream gradient, and intended functional goals for the wood. Maybe the trees to be removed can be less than 21” dbh and still get the job done.

We support culvert replacement to meet current standards for fish passage, but ideally passage would be provided both upstream and downstream of all life stages of all organisms.

We support “Stage 0” restoration to reconnect the streams with their floodplains, and adding large wood to dissipate energy and make habitat more complex, but we understand that this kind of restoration is new and we likely have a lot to learn along the way toward establishing self-organizing, self-sustaining fluvial systems.

We support raising the base level of incised streams, but we have concerns about using mine tailings for this, due to the altered substrate size composition and altered chemistry of these tailing materials.

We urge the Forest Service to strive to restore the ecosystem processes, not just ecosystem structures. The structures are ephemeral and require continuous maintenance via ecosystem processes, such as vegetation growth and succession, wildfire, floods, beaver activity, etc.

We urge the Forest Service to manage for biodiversity, not just for ESA-listed fish, but also the predators of fish, the species that fish prey upon, as well as redband trout, lamprey, beavers, frogs, mussels, mollusks, invertebrates, birds, etc.

It is important to design these projects with global climate change in mind. That means an amplified hydrological cycle, with more intense periods of wet and dry. Think about larger culverts, larger floods with the capacity to move more sediment and wood.

We urge the Forest Service to move forward with these restoration projects while keeping our concerns in mind and striving to find ways to mitigate them.

Sincerely,

/s/

Doug Heiken