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May 29, 2025

Stephaney Kerley, La Grande District Ranger
Brianna Carollo, Environmental Coordinator
Megan Hederman, Hydrologist
Wallowa-Whitman National Forest
3502 Hwy 30, La Grande, OR 97850

Submitted electronically <https://www.fs.usda.gov/project/wallowa-whitman/?project=64101>

RE: Upper Grande Ronde River Mine Tailings Restoration Project
Preliminary Environmental Assessment and Finding of No Significant Impact

Dear Ranger Kerley, Ms. Carollo, and Ms. Hederman,

We are writing on behalf of the Greater Hells Canyon Council (GHCC) regarding the 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 Upper Grande Ronde River Mine Tailings Restoration project.

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 Basin 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.

We appreciate that the Forest Service is undertaking an Environmental Assessment process for this project. The project proposes relocating about one mile of road, replacing culverts, and other associated aquatic restoration activities. While projects like this will have long term benefits, they also come with some intense (though often temporary) effects. A NEPA analysis through an Environmental Analysis (EA) process seems appropriate.



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The project is 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 appreciate that the Forest Service has considered travel management considerations as part of this project.

We appreciate the attention to beaver activity in the project area. Please continue to accommodate beavers as an important part of the restoration of aquatic systems of the region.

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,

Brian Kelly

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