



September 18, 2025

Mt. Hood National Forest
16400 Champion Way
Sandy, OR 97055
ATTN: Michelle Lombardo, NEPA Planner

In Reply To: Lost Lake Late Successional Reserve Acreage Swap

Dear Ms. Lombardo:

American Forest Resource Council (AFRC) is a regional trade association whose purpose is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies and decisions regarding access to and management of public forest lands and protection of all forest lands. AFRC represents over 50 forest product businesses and forest landowners throughout the West. Many of our members have their operations in communities adjacent to the Mt Hood National Forest, and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. The state of Oregon's forest sector employs approximately 61,000 Oregonians, with AFRC's membership directly and indirectly constituting a large percentage of those jobs. Rural communities, such as the ones affected by this project, are particularly sensitive to the forest product sector in that more than 50% of all manufacturing jobs are in wood manufacturing.

In 1994, the Northwest Forest Plan (NWFP) set aside the vast majority of National Forest System (NFS) land in reserves where sustainable timber management is prohibited. Currently, only about 15% of the NFS lands governed by the NWFP are allocated as "Matrix" where sustainable timber management is an objective. Even on that small segment of land, the Mt Hood National Forest has never come close to attaining the Probable Sale Quantity of 65 million board feet calculated to be provided from it.

The Lost Lake LSR Acreage Swap proposes to diminish this Matrix land base further. The rationale for this decrease is not clear in the Proposed Action.

We understand the concerns about effective management in and around the Lost Lake recreation area. It is unfortunate that, as the Proposed Action states: *the LSR allocation limits the ability of the Forest to establish defensible space and manage fire hazards*. We fully support the Forest's desire to remove restrictive Management Plan components that constrain your ability to effectively manage hazardous fuels and advance forest health. The standards and guidelines that govern the LSR system have proven to be an obstacle to such objectives.

However, we are confused with the rationale to "replace" the 299 acres of LSR with 1,535 acres of Matrix. Why has the Mt Hood determined the need to replace these LSR acres with *five times* as many Matrix acres? Wouldn't the sensible approach be to seek a 1:1 replacement ratio? Surely the Forest Service could identify 299 acres of Matrix among the 1,535 acres proposed for removal.

The location, accessibility, and stand conditions of these 1,535 acres are irrelevant. There are currently millions of acres of LSR that do not contain late-successional forest habitat. Similar conditions also existed when the NWFP was adopted in 1994. However, if the Forest Service has some other strong reason for wanting these 1,535 acres to be redesignated as LSR, we strongly urge you to ***identify an additional 1,236 acres of LSR that could be redesignated as Matrix***; this would maintain the current ratio of LSR:Matrix.

Ultimately, we're not supportive of any proposal that diminishes the existing Matrix land base any further than its current proportion of 15% of NWFP NFS lands. We urge the Mt Hood to either decrease the proposed Matrix "trade in" acres or identify other LSR acres to transfer to the Matrix land base.

AFRC is happy to be involved in the planning and decision-making process for the Lost Lake LSR Acreage Swap project. Should you have any questions regarding the above comments, please contact me at 541-525-6113 or ageissler@amforest.org.

Sincerely,



Andy Geissler
Federal Timber Program Director
American Forest Resource Council