

Jody Behr
1509 Taylor Ave Hood River, OR 97031

RE: Public Comment on Lost Lake Late-Successional Reserve Acreage Swap
File Code 1950
Submitted to Mt. Hood National Forest September 16, 2025

Dear Acting Forest Supervisor Abbas,

I am writing to provide comments on the Lost Lake Successional Reserve Acreage Swap, which proposes to amend the Mt. Hood National Forest Land and Resource Management Plan (Forest Plan), as amended by the Northwest Forest Plan (NFP). After reviewing the Notice of Proposed Action (dated August 13, 2025), I submit the following concerns and request that Lost Lake remain within the LSR #RO-201.

The proposal would change the allowable land use of the Lost Lake Successional Reserve. This is significant and needs a much more detailed environmental analysis, most likely an Environmental Impact Statement (EIS), to be considered instead of the proposed Categorical Exclusion (CatEx).

The 299 acres trade-out area in the proposal is at the headwaters of Lake Branch and is one of the most productive spring Chinook tributaries in the watershed. The potential for increased development for human recreation is extremely high should the proposed swap occur. Land use restrictions in riparian areas are typically not adequate to protect the endangered animals that live there. Salmon do not relocate to a new home when their habitat is degraded. The salmon remembers where they were born and return to these places to procreate. It is our responsibility to protect these habitats.

Chinook salmon are considered a key bioindicator species in the Columbia River because their health reflects the overall health of the ecosystem. As a keystone species, chinook salmon are a vital part of the food web for both wildlife and humans, and their sensitivity to environmental factors like water temperature and flow makes them a "canary in the coal mine" for the river's well-being.

The fact that the headwaters of Lake Branch is excellent habitat is fabulous news and needs to be disseminated. We need to study this area, determine what is working and implement these practices in our other tributaries. This is a reason for hope in a world filled with fear.

To consider any modification to the existing zoning at this location, a detailed environmental impact study that addresses all potential impacts to the following is mandatory:

- Impacts to all endangered animals that rely on this habitat including but not limited to chinook salmon, northern spotted owl, and the gray wolf.
- Impacts to the surrounding old growth forest.
- Results of fragmentation to the reserve network by removing the LSR designation.
- Alternatives to manage the fire hazard concern without modifying the allowable land use at Lost Lake including but not limited to performing the LSR management assessment referenced in the 8-13-25 proposal.
- Concern for precedent-setting possibility to change every LSR designation that may have a recreational development potential. (Note: LSRs function because they connect large swaths of land required for habitat.)

Please retain the Lost Lake recreation area within the LSR #RO-201. The management challenges cited can be addressed through preparation of the LSR management assessment and existing NFP flexibility, without reducing the reserve system.

Thank you,

Jody Behr