

Mt. Hood National Forest  
Michelle Lombardo  
16400 Champion Way  
Sandy, OR 97055

Re. Lost Lake Late-successional Reserve Acreage Swap

Dear Ms. Lombardo,

We are residents of the Hood River Watershed and beneficiaries of the many resources available from the Mount Hood National Forest. We have several concerns regarding the Forest's proposal to amend the Mt. Hood National Forest Land and Resource Management Plan to change the management direction and align with management needs of the Lost Lake Recreation Area.

The Forest states that tree cutting is currently limited in the area surrounding Lost Lake Resort since a late-successional reserve assessment has not been completed for LSR #RO-201, despite having had thirty years to do so. We suggest that the Forest undertake and complete the missing LSR assessment before abandoning the LSR status of the Lost Lake shore. The Forest should take actions based on knowledge developed from such a report rather than acting blindly without it.

The proposed LSR replacement areas, while larger in size, are not of the same quality in terms of late-successional development or potential. For example, much of the northwest area (above Lake Branch Road) is characterized by talus slopes and debris flows that are unlikely to ever support stable late-successional stands.

By proposing to remove the acreage along the east shore of Lost Lake from the LSR the Forest will create a hole in the now contiguous LSR #RO-201 thus impacting the larger integrity of the reserve and the habitats within it. While the Forest suggests that recreational activities are incompatible with some LSR objectives, the proposed action will only exacerbate the effect of recreation on the forest ecosystem and the larger LSR. Creating a hole in the larger LSR to remove vegetation and expand those recreational activities will further impact not only the resulting hole but the surrounding LSR over time. While conditions within the area proposed for removal may be imperfect for wildlife habitat, it will be far less damaging to retain the integrity of the existing LSR and work to mitigate the impacts of recreational activities within it.

The Forest notes some incompatibilities between the LSR designation and the recreational footprint of Lost Lake Resort. Rather than abandoning the Late Successional objectives the Forest should consider mitigating some of these inconsistencies. For example, sound-proofing the “loud generator building” will reduce wildlife impacts and have the added benefit of a better recreational experience.

While the Forest states that the proposed action does not include any ground disturbance, new development or other changes to the existing use of the area, it makes clear that the entire reason behind the proposed change is to allow for actions that will include ground disturbance and additional development in the future. These inevitable second-order actions have the potential to impact fish and wildlife habitat, water quality, fire risk and the quality of recreational experiences.

Tree removal, increased development and greater visitor density will lead to soil erosion and an influx of pollutants into the Lost Lake and Lake Branch. Reduced tree and vegetation cover will risk warming the Lake water and subsequently the waters of Lake Branch, impacting steelhead critical habitat (noted in Table 2). Reduced forest canopy density can also lead to warmer and drier conditions on the ground, thereby decreasing the quality of recreational experiences and increasing fire risk.

The Forest states that a primary purpose for the proposed action is to implement fire mitigation, primarily through tree removal, to protect facilities, visitors and staff. Fire safety is a critical concern, but there are many measures the Forest could take—and should already have taken—without the proposed action and without impacting the development of late-successional stands.

- Human safety should be the first concern regarding wildfire. Currently there is only one exit out of the Lost Lake resort area via Lost Lake Road, which is insufficient in an emergency evacuation. One alternative exit via Lake Branch Road is closed due to a failed bridge and areas of road collapse resulting from poor culvert management and slumping. This declining asset should be repaired and made passible even if just for emergency use.
- Existing cabins and other structures should be fire-hardened with metal roofs, fire-resistant siding, fire-resistant ventilation and sprinkler systems.
- Highly flammable yurts should be removed from the area.

The Forest indicates that the current LSR designation limits their ability to meet “increasing public demand for recreation in this area.” The supply of a quality recreational experience here is ultimately finite, and the Forest cannot and should not base its actions on an

unmitigated demand trajectory. Rather than paving the way to continually expand Lost Lake resort area to meet ever increasing demand the Forest should examine alternatives:

- Has the area already reached or exceeded its logical capacity?
- Should the number of visitors to the area be moderated or better regulated?
- Should the development footprint be capped or reduced?
- Is the quality of recreational experiences at risk of declining due to overuse?
- Should effort be put into expanding other nearby recreational opportunities in the Forest?

We take exception to the statement in Table 2 claiming that since the proposed action lies within the Hood River Watershed it “would have no effect on municipal watersheds.” This is incorrect. Over 20,000 people derive their drinking water from the Hood River Watershed including residents of the City of Hood River.

While the Forest claims that the proposed action is simply an administrative adjustment in designations it will clearly pave the way for alterations that will have impacts on late-successional stand development, fish and wildlife habitat, recreation quality and fire risk within but also well beyond the Lost Lake shore. We urge the Forest to abandon the proposed action.

Respectfully,

Ann Dow and Sam Doak