9/18/2025



Bark  
PO Box 12065  
Portland, OR 97212  
www.bark-out.org  
503-331-0374

Michelle Lombardo, NEPA Planner

Mt. Hood National Forest

16400 Champion Way

Sandy, OR 97055

RE: Lost Lake LSR Acreage Swap

Dear Michelle,

As you are aware, Bark's mission is to transform the lands now known as Mt. Hood National Forest into a place where natural processes prevail, where wildlife thrives, and where local communities have a social, cultural, and economic investment in its restoration and stewardship. Our supporters live in the many communities surrounding Mt Hood National Forest. They rely on the Forest for drinking water, economic opportunities, recreation, forest products, spiritual renewal, connection to the land, and more. We submit these comments on behalf of our supporters.

**TRIBAL INCLUSION**

After further research, Bark determined that Lost Lake and the surrounding area contained important berry fields that were managed by families and Tribes connected to today’s Confederated Tribes of Warm Springs and Confederated Tribes and Bands of the Yakama Nation.

The Notice of Proposed Action (NOPA) does not mention whether Tribal consultation took place during the development of the proposal. Has the Mt Hood NF consulted with relevant Tribes?

**LACK OF TRANSPARENCY AND COLLABORATION**

The Lost Lake Resort & Campground is owned and managed by private owners under a special use permit with the Mt Hood National Forest. Indeed, the public cannot even reach the lake (located on public land) by car without paying a $15 access fee. The proposed LSR swap stands to benefit the private interests of these owners. Further, a change to the “Administratively Withdrawn” designation could enable future expansion of the resort and campground infrastructure.

**Before moving forward with a proposed land use swap, the Mt Hood must release the special use permit between the Lost Lake owners and the Forest.** Without releasing this permit, the public cannot understand the potential implications of removing the LSR designation and what might be allowed by the permit.

Why does this matter? Look to the second bullet point on page 3 of the NOPA:

* *“With increasing public demand for recreation in this area, future planning for the Lost Lake Resort, Campground, Day Use Area, and Sentinel Spur is constrained by the LSR allocation, which limits tree cutting.”*

Though vague, this reasoning for why an LSR allocation limits management of the lake seems to indicate the potential for future expansion of the resort and campground to meet increasing public demand. Again, any expansion of the Lost Lake Resort and Campground stands to benefit the interests of the private owners. Because the resort relies on public land to operate, the Mt Hood National Forest must clearly describe what the Administratively Withdrawn allocation allows, what the special use permit allows, and be transparent about the Resort’s future development plans.

**MANAGEMENT WITHOUT AN LSR ASSESSMENT**

Bark is not convinced that the Mt Hood cannot do active management in LSR #RO-201 without an assessment. While we recognize that the absence of an assessment creates complexities, active management within an LSR without an assessment is still possible if the proposed actions meet the relevant Standards and Guidelines and are reviewed by the Regional Ecosystem Office (REO).

Has the Mt Hood pursued other alternatives besides removing the LSR designation? Has the Mt Hood contacted the REO to describe the need and discuss possible paths forward?

**LSR “TRADE-IN” PARCELS**

Information regarding how Mt Hood staff evaluated the habitat quality and suitability of the proposed trade-in parcels is lacking. The NOPA states that northern spotted owl habitat was used to determine whether areas were suitable. It also states that onsite evaluations were conducted.

While identifying NSO habitat is a good place to start, it should not be the only factor considered when determining a parcel’s ability to meet habitat requirements for LSR. What other geospatial data was used in determining habitat suitability within the trade in parcels? What field surveys or on-the-ground assessments were completed? What did the “onsite evaluation” entail?

During a survey by Bark staff, the parcel on Lost Lake Butte seemed marginal in terms of suitability. Small sections of the parcel are beginning to develop the structural complexity typical of mid to late seral forests, but much of the rest of the parcel contains young, dense, single-story forest with a thick understory of rhododendron.

A forest with trees and grass

AI-generated content may be incorrect.

Parts of Lost Lake Butte trade-in Parcel have already had large old-growth trees felled/removed.

A group of trees in a forest

AI-generated content may be incorrect.A group of trees in a forest

AI-generated content may be incorrect.

Dense, young, single-story forest is prevalent throughout the Lost Lake Butte trade-in Parcel

**CONCLUSION**

There is clearly a need for a long-term solution that balances visitor safety, recreation impacts, and ecological conservation and stewardship in the Lost Lake area. However, the NOPA falls short. At a time where public lands across the country are under increasing threat of privatization, any solution for the Lost Lake area must come from a process that is transparent and include meaningful outreach to the public, Tribes, and relevant stakeholder groups.

This NOPA lacks transparency and meaningful public input. For that reason, **Bark does not support the LSR swap, and we strongly recommend the Mt Hood withdraw the current proposal.**

Thank you,

*A picture containing hanger, lamp, necklet, insect

Description automatically generated*

*Jordan Latter*

Forest Watch Program Manager, Bark