



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

September 19, 2025

RE: Lost Lake Late-successional Reserve Acreage Swap

Dear Ms. Lombardo,

The Hood River Forest Collaborative represents a diverse group of stakeholders interested in healthy forest ecosystems, economic vitality, and quality of life in Hood River County. The collaborative has worked with the Hood River Ranger District since 2011 to provide input to the Forest Service in the planning of forest restoration and management projects.

The collaborative offers the following comments regarding the proposal:

- The 299 acres of Late-successional Reserve (LSR) includes old growth forest and the headwaters of Lake Branch Creek, an important clear water stream that supports numerous anadromous fish species. The area is a high use recreation site that provides exceptional access to a unique high-elevation lake that is accessible to limited mobility visitors, a rare combination on the Hood River Ranger District. Due to the significant human use and existing recreational infrastructure, the Lost Lake area is likely not fully functioning as a Late-successional Reserve. The overarching intent of the proposal to better align existing uses with a more appropriate land use allocation represents a reasonable attempt to address a long-standing issue on the Hood River Ranger District.
- **The identified matrix lands are not of equal habitat quality and the reduction in matrix lands is not addressed.** The collaborative is concerned about the ratio of matrix lands being moved into Late-successional Reserve status (1535 acres). Matrix lands were identified in the Northwest Forest Plan to support long-term sustainable timber production. The collaborative is concerned about the amount of matrix being moved into

LSR without replacement lands. Further, the quality of habitat in the identified replacement matrix lands is not currently late-successional habitat.

- **Changing the land use allocation at Lost Lake Resort would enable further development of the resort.** Forest Service proposals should be transparent with the public about plans for future expansion at the resort.
- **The Lost Lake LSR swap process has not been transparent or collaborative.** As part of this process, the Forest Service should publish a copy of the relevant special use permit and operating agreement. If the Forest Service pursues this proposal, the Hood River Forest Collaborative would welcome the opportunity to work with relevant partners to develop solutions that can work for affected parties.

There are alternatives and related actions that should be considered as part of this analysis:

- **Ingress and egress should be considered a high priority action to support public safety and evacuation planning.** Lost Lake Resort can only be accessed via Lost Lake Road. The Forest Service should consider fuels treatments along Lost Lake Road. Establishing a second egress route using Lake Branch Road would increase opportunities to safely evacuate the area in a wildfire or another emergency situation.
- **Defensible space, structure hardening, and hazard tree removal are high priority actions to reduce wildfire risk.** These actions are permissible and should be the highest priority actions to mitigate wildfire risk and promote public safety at Lost Lake Resort. The Forest Service should utilize the USFS Late Successional Reserve Work Group (<https://www.fs.usda.gov/r6/reo/landuse/lsr/>) to ensure any wildfire risk reduction projects at Lost Lake Resort are consistent with the Northwest Forest Plan.
- **The Forest Service should consider conducting an LSR Assessment for the Bull Run Watershed and Lost Lake.** As the Mt. Hood continues to experience hotter, dryer weather and longer fire seasons the Forest Service should maintain management flexibility to adapt to changing climatic conditions and promote watershed health and resilience. Conducting an LSR Assessment would provide for future management options and flexibility.

The *Northwest Forest Plan Standards and Guidelines for management of Habitat for Late-successional and Old Growth Dependent Species Within the Range of the Northern Spotted Owl* provide flexibility to address wildfire hazards at Lost Lake Resort. Specifically, the relevant sections of the document include:

“In some Late-Successional Reserves in these provinces, management that goes beyond these guidelines may be considered. Levels of risk in those Late-Successional Reserves are particularly high and may require additional measures. Consequently, management activities designed to reduce risk levels are encouraged in those Late-Successional Reserves even if a portion of the activities must take place in currently late-successional habitat. While risk-reduction efforts should generally be focused on young stands, activities in older stands may be appropriate if: (1) the proposed management activities will clearly result in greater

assurance of long-term maintenance of habitat, (2) the activities are clearly needed to reduce risks, and (3) the activities will not prevent the Late-Successional Reserves from playing an effective role in the objectives for which they were established.”

“Existing developments in Late-Successional Reserves such as campgrounds, recreation residences, ski areas, utility corridors, and electronic sites are considered existing uses with respect to Late-Successional Reserve objectives, and may remain, consistent with other standards and guidelines. Routine maintenance of existing facilities is expected to have less effect on current old-growth conditions than development of new facilities. Maintenance activities may include felling hazard trees along utility rights-of-way, trails, and other developed areas.”

The collaborative strongly encourages the Forest Service to consult with relevant tribes as part of this process.

Collaborative Membership

The following individuals are voting members of the Hood River Forest Collaborative. The collaborative operates on a consensus decision-making model.

Andrew Meyers, Oregon Department of Fish and Wildlife
Andy Dwyer, Oregon State Fire Marshal
Carrie Thomas, Thrive Hood River
Cindy Thiemann, Hood River Watershed Group
Gary Asbridge, Local Resident
Jim Denton, Local Resident
Jon Paul Anderson, WKO/High Cascade Inc.
Jordan Latter, Bark
Kayla Bordelon, Oregon State University Extension
Kristin Dodd, Oregon Department of Forestry
Mia Pisano, Bark
Rick Ragan, Local Resident

Thank you for the opportunity to provide input. The collaborative appreciates our partnership with the Hood River Ranger District and Mt Hood National Forest.

Sincerely,



Andrew Spaeth
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