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First name: GRADEY

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Organization:

Title:

Comments: To whom it may concern,

I am writing today to express concerns with the Grasshopper project. The Purpose and Need states that, [ldquo]The goal of the Grasshopper Project is to implement vegetation treatments through a variety of methods across approximately 7,660 acres of the Mt. Hood National Forest, restoring the landscape to conditions more consistent with natural disturbance regimes and species compositions. Treatment types could be, but would not be limited to, sapling thinning; commercial plantation thinning; variable density thinning from above and below; and shelterwood cutting. Treatment would occur across a variety of stand types and stand ages to meet stated objectives.[rdquo]

I have had the chance to walk many of these units I have found much of the area I explored difficult to imagine meeting these said needs. For example Units 141 and 151 leading into the Wilderness area being designated as Shelterwood cuts? Being implemented for a fire break? Many of these stands are Mountain Hemlock and Engelmann Spruce, an old growth higher altitude community where regeneration growths would be slow and where fires are less of a risk. Plus many of these stands are unlogged old growth communities that show no sign of previous fire damage.

I was also about to explore previous sales in the area like 3 Conifer which was a thinning project designed for fire reduction. I see no mention of this in the analysis. I would be curious to see if this former project achieved any of these fire reduction goals and how this project will be any different.

There was also a fire in 1994 that went through the area so there should be ample opportunities to have a more detailed conversation around these objectives and the cumulative impacts.

The Grasshopper area also includes significant acres of Critical Habitat for the northern spotted owl, and at least three owl nests have been previously located. The pileated woodpecker and pine marten are two management indicator species under the Mt. Hood Forest Plan. The Grasshopper timber sale includes 541 acres of their important habitat.

This project is also a great opportunity to evaluate the current roads system and impacts to assess future needs for access in this project area, while actively looking at how to reduce the oversized road network forest-wide. More could definitely be done here.

I am concerned that the Grasshopper project currently includes 213 acres within what the Mt. Hood Forest Plan designated as [ldquo]Unroaded Areas[rdquo], in addition to 272 acres of logging within a National Inventoried Roadless Area. Both land use allocations were designed to retain their roadless condition and should not be entered for logging using [ldquo]temporary[rdquo] roadbuilding as part of this project. Especially not seventeen miles of [ldquo]temporary roads[rdquo] We know there is nothing temporary about these roads. Even when these roads are decompacted they persist on the landscape for decades. And we know that most of the time the funding is not available from the project to properly do the work.

Further, the 2019 Scoping document suggests that [ldquo]past management activities have created highly dense, closed-canopy conditions[hellip] contributed to the mortality of trees[hellip][and] slowed the development of new age classes and structural variety that would have occurred with natural disturbance in the past[rdquo] howeveralmost 70% of the planning area includes Riparian Reserves, unroaded, previously unlogged or designated wildlife habitat, while less than a third of the area is described as previously or recently logged.

Sincerely,

Gradey Proctor