

Data Submitted (UTC 11): 10/14/2022 10:55:19 PM

First name: Mia

Last name: Pisano

Organization:

Title:

Comments: 10/14/2022

RE: In accordance with 36 CFR §218, I object to the Environmental Assessment ("EA") and draft Decision for the Grasshopper Restoration Project, located in the Barlow Ranger District of the Mt. Hood National Forest.

Objector's Interests: I visit and use this part of the forest for recreation, I depend on the forests of Mt Hood for clean drinking water, and I depend on the forest for sequestration and storage of atmospheric carbon dioxide. I submitted comments during the scoping period, and on the Preliminary EA. I visited and made extensive observations and data collection in numerous units of the project, including (but not limited to) units 56 and 260. I have also participated in discussion of this project as an attendee of the Wasco County Forest Collaborative, which I have attended since April, 2020.

Requested Relief:

*Drop Unit 260 in its entirety, and modify Unit 56 to exclude the north half of the unit.

I submit this Objection for the following reasons:

These units are both designated LSR, and are within the NRA. Unit 260 is also designated Riparian Reserve. Both units contain extensive wet soils and surface water, both year-round and seasonal. Unit 260 is entirely comprised of wet meadow. The north half of Unit 56 is also comprised entirely of wet meadow.

Inexplicably, despite the land allocation and the observable and well-documented conditions, the EA excludes both of these units from the PDCs developed for treatment within Riparian Reserves, and designates both of these units for Intermediate Commercial Thinning/Plantation treatment, without explanation or rationale for this change in designation.

Furthermore, the following PDCs should apply to these units, regardless of their exclusion from RR treatment. From the EA, Appendix A, PDCs, page 3, Soils, #8: Meadows identified on pre-sale maps would be protected by not allowing new temporary roads, landings or ground based equipment to operate within the delineated area. From the EA, Appendix A, PDCs, page 7, Hydrology, #6: No ground-based equipment would operate, and no new temporary road construction or new landings would occur within 100-feet of streams, seeps, springs, or wetlands. However, where pre-existing temporary road alignments or landings exist they may be utilized as long as they do not intersect any perennial stream, spring or wetland and are not hydrologically connected to these features. If water is present at intermittent or ephemeral streams, watershed personnel will work with the timber sale administrator to facilitate crossing solutions.

These PDCs would exclude the entirety of Unit 260, and the north half of Unit 56, from treatment with ground-based equipment. If these PDCs are applied, as they must be, then Intermediate Commercial Thinning/Plantation treatment is excluded from Unit 260, and from the north half of Unit 56. The total area of Unit 56 is 27 acres. If the north half is excluded from the use of ground-based equipment, as it must be, then 13 acres will remain. Is it commercially feasible to conduct the road upgrades necessary to conduct commercial thinning on 13 acres of Unit 56?

This information has been provided to the agency since 2019, by myself and other commenters. These concerns have been raised, and have not been addressed.

In my scoping comments, and in my EA comments, I raised these concerns and submitted evidence on the conditions within these units. Additional evidence is included in files attached to this objection.

I would welcome a productive pre-decisional objection resolution meeting with agency staff. If you have any clarifying questions about this objection, please don't hesitate to contact me.

Respectfully,

/s/ Mia Pisano