Data Submitted (UTC 11): 9/18/2025 11:45:13 PM
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Comments: The Hood River Watershed Group appreciates the opportunity to comment on the Mt. Hood National Forest's (MHNF) proposal to amend the Mt. Hood National Forest Land and Resource Management Plan in order to change the management direction and align with management needs of the Lost Lake Recreation Area. The Hood River Watershed Group (HRWG) is the designated watershed council for the Hood River Watershed and longtime partner of the Hood River Ranger District. HRWG has worked to sustain and improve the watershed through community education and cooperative projects in water conservation, habitat restoration, and protection of watershed health. Our work is informed by careful assessment, monitoring, and planning efforts and forged through diverse partnerships.

The preliminary environmental analysis of the proposed action notes several times that "Because no ground disturbance or changes to the existing use of the area are proposed, the preliminary effects analysis found that the proposed action would result in no effect to any of the resource conditions discussed...", such as municipal watersheds, wetlands, and species listed as threatened or endangered under the Endangered Species Act. At the same time, the MHNF notes that "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." Thus, it seems clear that removing Late-successional Reserve (LSR) designation in the proposed area will ultimately lead to tree cutting/vegetation management, and potentially other ground disturbing activities and increased human use of the Lost Lake Recreation Area. It is this eventuality that we direct our comments and concerns.

Lake Branch is one of the most valuable tributaries for steelhead and salmon habitat in the watershed. Unlike many other Hood River tributaries, it is not influenced by glacial runoff and has excellent water quality. It also provides important spawning habitat and juvenile rearing for spring Chinook and an extremely threatened population of summer steelhead. The Forest Service and the Confederated Tribes of the Warm Springs have implemented several fish habitat restoration projects along the creek, and annual spawning surveys have documented strong use by spring Chinook. At the same time, Lake Branch faces increasing human impacts from municipal water demand and a warming climate.

HRWG is concerned that removing the protection afforded by Late-successional Reserve designation around half of Lost Lake's drainage area will make it much easier to increase the human footprint in the headwaters of Lake Branch. If it were allowed, increased development and visitor density would lead to increased impervious surfaces, soil erosion, riparian vegetation damage, and nutrient loading from human waste and camping activities. Substantial tree and shrub removal could reduce the cooling effect of the lake's riparian vegetation, particularly given the western exposure of the proposed area. All of this would influence the water quality of Lake Branch and its fish habitat, particularly water temperature, turbidity, and nutrients.

As members of the community and the Hood River Forest Collaborative, HRWG understands and supports the need for management to reduce wildfire risk and protect human safety. In this regard, questions to consider include:
Could MHNF decide to prioritize a separate management assessment for the portion of LSR #RO-201 that is within the Lost Lake drainage?
Are other fire safety measures being considered that don't require removal of LSR designation?

We appreciate our collaborative relationship with the Forest Service and would welcome any opportunity to help generate ideas that reduce the risk of wildfire and at the same time protect the ecological integrity of Lake Branch's headwaters.