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July 9, 2018

Via Aquatic Restoration Project webpage:
https://cara.ecosystem-management.org/Public//CommentInput?Project=47428

Mr. Eric Watrud, Forest Supervisor
Umatilla National Forest
72510 Coyote Road
Pendleton, OR 97801

RE: Comments for the Forest-wide Aquatic Restoration Project Draft Environmental Assessment (DEA)

Dear Mr. Watrud:

I am writing on behalf of the Greater Hells Canyon Council (GHCC) to comment on the Forest-wide Aquatic Restoration Project Draft Environmental Assessment (DEA). A variety of aquatic restoration activities are proposed throughout the Umatilla National Forest in the Blue Mountains of northeast Oregon. GHCC submitted scoping comments on this project to the Umatilla National Forest during August, 2016.

Greater Hells Canyon Council is a grassroots conservation organization founded in 1967 (as Hells Canyon Preservation Council) to stop Hells Canyon and the Snake River from being dammed. Not only did we stop the dam, our advocacy led to the creation of the Hells Canyon National Recreation Area. Our work now focuses on public lands management in the entire Greater Hells Canyon Region. We cover such diverse issues as logging, grazing, recreation, mining, species protection, wildlife connectivity, and more.

Our mission is to connect, protect, and restore the wild lands, waters, native species and habitats of the Greater Hells Canyon Region, ensuring a legacy of healthy ecosystems for future generations.

GHCC actively participates in Forest Service proceedings and decisions concerning the management of public lands and is an interested public with regards to forest management activities within the Umatilla National Forest. Along with other diverse interested parties, we are a founding member of the Umatilla Forest Collaborative Group.

Proposed Action
The Umatilla National Forest proposes aquatic restoration activities on national forest system lands and on private lands (with cooperating landowners) within and adjacent to the Umatilla National Forest. The proposed action includes multiple categories of projects to address aquatic restoration. Up to fifteen restoration actions

would occur annually.

Comments
Greater Hells Canyon Council is very pleased to support this initiative to restore native fish, their habitats, clean waters, and riparian areas. We actively advocate for these types of protection and restoration activities. We have done so since our organization was formed over fifty years ago. We are really grateful to see the Umatilla National Forest take an active role toward protecting and restoring the basic element of all life on earth-water. We appreciate the initiative the Umatilla National Forest is taking to address the vitally important issues of water, fish, and riparian ecosystems.

As described in our scoping comments of 2016, we are concerned about the negative impacts that livestock grazing has on riparian areas, and we are also concerned about the negative impacts that livestock fencing has upon native wildlife. While livestock fencing can produce immediate benefits for aquatics, fencing also creates problems for wildlife. Since riparian areas are vital for wildlife, riparian fencing is of particular concern. The financial costs of building fences on public lands are also considerable concern for the tax-paying public.

We understand that range management activities are authorized under other authorities and have been considered to be outside the scope of this environmental assessment. However, we continue to encourage the Umatilla National Forest to implement the best possible range management practices in order to protect riparian areas and prevent damage to these sensitive plant communities and aquatic systems. We also encourage the National Forest to consider potential negative impacts to wildlife when designing livestock fencing systems. We appreciate your on-going consideration of these concerns.

As we also described in our scoping comments of 2016, it is important that any tree-cutting that may be associated with aquatic restoration will be based on achieving valid and important aquatic restoration objectives. We are encouraged that, as stated in the DEA, "Many proposed vegetation treatments would not be implemented for commercial value. Instead, the composition and productivity of key riparian vegetation would be managed to improve or protect riparian-dependent and/ or ground-water dependent resources". (Draft EA, page 103).

We continue to encourage the Umatilla National Forest to protect old trees and standing-dead trees (snags), retain any trees that may be cut to be used on-site for aquatic and wildlife benefits, retain down logs for the benefit of the terrestrial and aquatic riparian ecosystems, and create snags through the judicious use of prescribed fire. We appreciate your on-going consideration of these concerns.

Umatilla Forest Collaborative Group
We would like to be informed about projects as they are developed after the Forest-wide Aquatic Restoration Project is finalized. As described above, we support aquatic restoration and we're excited to see these projects come to fruition. As a member of the Umatilla Forest Collaborative Group, we would appreciate periodic updates to the collaborative group and we imagine that other members of the collaborative group would be interested as well.

Conclusion
Greater Hells Canyon Council very much appreciates this effort that the Umatilla National Forest is giving to aquatic restoration. Thank you.

Thank you for considering our comments. Please do not hesitate to contact me with any questions. We look forward to working with you as this project develops.

Sincerely,

Brian Kelly

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