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September 7, 2018
Via electronic comments on the project webpage
Michael Rassbach, District Ranger
1415 West Rose Street
Walla Walla, WA 99362

Re: Glass Restoration Project: Comments on the Draft Environmental Assessment

Dear Ranger Rassbach,

I am writing on behalf of the Greater Hells Canyon Council (GHCC) to provide comments about the proposed Glass Project. GHCC is a non-profit conservation organization based in La Grande, OR with approximately 1,000 members. GHCC's 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 within the Umatilla National Forest. GHCC has an interest in the potential impacts of commercial timber sales, livestock grazing, road building, thinning for fuels reduction, restoration initiatives, and other proposed projects undertaken by the Forest Service within these ecosystems. GHCC also actively advocates on behalf of beneficial ecological restoration projects to restore ecosystems that were degraded by the impacts of previous management activities.

Additionally, GHCC is a founding member of the Umatilla Forest Collaborative Group (UFCG) and regularly participates in collaborative meetings and field trips. Through this collaborative participation, GHCC has a good understanding about the development of the Glass Project.

Project Location
The project is located within Union County and Umatilla County, Oregon within the Upper Lookingglass, Little Lookingglas and Jarboe Creek subwatersheds. These areas drain into the Grande Ronde River system. The project area is located about 16 miles north of Elgin, OR and about 30 miles northeast of Mission, OR.

Proposed Actions
Proposed activities include commercial logging and non-commercial thinning within previously clear-cut areas. Connected actions include erosion control, log hauling, road-maintenance, use of temporary roads, "danger tree" removal, and fuels treatments.

The Forest Service has developed and will evaluate two "proposed action" Alternatives. The "no action" alternative may also be selected.

Umatilla Forest Collaborative Group

As noted above, GHCC is a founding member of the Umatilla Forest Collaborative Group (UFCG) and regularly participates in collaborative meetings and field trips. The UFCG is a group with defined operating principles, rules of conduct, decision-making process, membership and third-party facilitation.

As described in the Draft Environmental Assessment for the Glass Project, "Public involvement began in 2015 when the Walla Walla Ranger District hosted the Umatilla Forest Collaborative Group (UFCG) on a field trip to the Glass project area. The Glass project is based, in part, on recommendations from the UFCG. The UFCG formed in 2011 to provide a platform for individuals and organizations to unite diverse interests toward common goals. The mission of the group is "to develop and promote balanced solutions from a diverse group of stakeholders to improve and sustain ecological resiliency and local community socioeconomic health in and near the Umatilla National Forest". Members represent stakeholders from a broad range of interests, including state and Federal agencies, the environmental community, timber industry, recreational groups, and state and county government. Many of the UFCG recommendations have been adopted in this EA, although final agreements are not yet available."

GHCC is grateful that the Forest Service has adopted many of the UFCG recommendations.

Additionally, and as stated in the Scoping document for the Glass project, "The objectives of the Glass Project have been developed within the context (of) the collaborative processes. Glass Project planning area was identified to highlight restoration opportunities in moist forest and build on agreements established within the Thomas Creek Restoration Project (2016)."

Greater Hells Canyon Council appreciates and supports these objectives. We appreciate that the Forest Service is building on the agreements of the Thomas Creek project. We encourage the Forest Service to adopt applicable aspects of the Thomas Creek agreements reached by the Umatilla Forest Collaborative Group and incorporate them into the Glass Project as it is developed forward.

We very much appreciate the efforts of the Umatilla National Forest and the Walla Walla Ranger District to successfully communicate with the Collaborative and to incorporate collaborative agreements into project development.

The Glass Restoration Project is Limited to Old Clear-Cuts

GHCC supports the Umatilla National Forest's approach on this project to limit commercial logging activities to within the footprint of previously clear-cut acreage.

The lands that were subjected to clear-cut logging in the past are in a very unnatural condition. The forests that have grown in after logging and planting would benefit from well-designed and thoughtful ecological restoration prescriptions.

The forests that surround these old clear-cuts appear to be mesic cool/ moist or cool/ wet forests. The majority of these intact forests appear to be old growth forests that were not previously logged in the past. These forests are extremely valuable for the habitat and carbon-sequestration that they provide.

Additionally, logging in the surrounding 'untouched' cool/ moist-wet forests has a high likelihood of increasing fire risk because logging allows increased solar radiation to penetrate into the otherwise shaded forest understory environment. Logging also increases fine fuels both though felling large trees and by subsequent growth of the understory.

GHCC highly appreciates that all logging/ mechanical treatments will be limited to the areas within the old clear-

cuts. Plans for commercial logging/ mechanical treatments should not be developed for areas outside of the boundaries of these old clear-cut units.

No Activity Proposed in IRAs, PWAs, or OULs

GHCC supports that no activity is proposed within the Jassud Corral, Lookingglass, Grande Ronde, or Walla Walla River Inventoried Roadless Areas (IRAs). The Draft EA also states that no activities are planned within Potential Wilderness Areas (PWAs) or Other Undeveloped Lands (OULs). GHCC appreciates the Umatilla National Forest is taking this approach on the Glass project. We encourage the Forest to continue to protect these categories of wild lands in future vegetation projects.

These wild lands are incredibly valuable for a wide variety of benefits including clean water, wildlife habitat, clean air, carbon sequestration, intact forest and grassland ecosystems, backcountry recreation, and the last remnants of natural landscapes for human solitude in an increasingly crowded planet. Their soils are the least disturbed by mechanized equipment and compaction and are refuge for an intact and complex web of life.

Thank you for not logging in these areas.

Large and Old Trees

We very much appreciate and support the protection of trees over 21 inches diameter at breast height. These large trees would not be removed in the Glass project with the exception of any that pose occupational danger. We would also support specific protections for trees that are 150 years or older. However, we understand that any residual trees in these old clear-cut areas are highly likely to be at least 21" dbh and therefore will be retained and protected.

Roads

Alternative A proposes approximately 1.2 miles of new temporary road construction as well as 7.3 miles of temporary road on existing templates. Alternative B does not propose new temporary road construction.

We appreciate Forest Service efforts to minimize disturbance to previously undisturbed soils. And we also understand that some older road beds from the past logging era cannot be utilized for the Glass project.

We very much appreciate that existing road bed footprints will be utilized. However, Alternative A would authorize about 1.2 miles of temporary roads to apparently be constructed on soils without evidence of an existing or historic road bed. We are concerned about environmental impacts to these previously undisturbed soils. These concerns include both damage to soil structure and biology and also the potential for illegal motorized use that may result from creation of these new routes on the landscape.

We understand that temporary roads are typically ripped and otherwise blocked after use. However, ripping does not fully restore the impacted soils to their previous biological and structural condition. Also, unfortunately, we have repeatedly observed illegal motorized use of roadbeds after their treatments to block them after the end of a timber project.

We request that the Forest Service continue to take a close look at the need for the temporary roads-especially those proposed to be constructed on soils without evidence of an existing or historic road bed.

Summary

We feel that the Glass project is on the right track. We appreciate its emphasis on the restoration of forests that were heavily impacted by past clear-cutting and plantation practices. We very much appreciate the Forest Service efforts to constructively engage with GHCC and the Umatilla Forest Collaborative Group as this project

has developed.

Thank you for the opportunity to participate in this planning process and for your review of these comments. We look forward to continuing to engage in the planning process within both the Umatilla Forest Collaborative Group and the NEPA process.

Sincerely,

Brian Kelly

Brian Kelly
Restoration Director
Greater Hells Canyon Council