Data Submitted (UTC 11): 3/20/2022 4:40:44 PM
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Title:
Comments: Grasshopper Restoration Project Draft Environmental Assessment
Mia Pisano

March 19, 2022

Dear NEPA Planner Ashley Popham and District Ranger Kameron Sam:

I am writing to submit public comment on the Grasshopper Restoration Project. I am a recreational user of the project area. I depend on the forest of the project area for air quality. I depend on the forest of the project area for carbon sequestration and carbon storage, for climate stabilization, the most urgent need of humanity worldwide.

I submitted public comment on this project during the scoping period, in August 2019. I have made numerous visits to the project area and extensive observations of numerous units within the project and also in the surrounding area. I have studied the planning materials and supporting documentation in great detail. 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.

I recognize and affirm that the area under consideration, now referred to as Mt. Hood National Forest, is the rightful homeland of the indigenous people who have always lived with this land, and that the process of forcible displacement of native people, and the displacement of native authority by the US federal government, has not been rectified.

Within that context, I respectfully submit these comments for your consideration. I have concerns regarding several aspects of the proposed action. I also have support for several aspects of the proposed action.

Areas of concern:
*Carbon accounting
*Shelterwood Alternative
*Impact on Northern Spotted Owl habitat
*Temporary roads potential locations
*Unmapped wet meadow
*R6 listed species

Areas of support:
*Qualitative analysis of carbon and climate issues
*Units dropped/treatment areas reduced after scoping
*Detailed PDCs re: treatments in Riparian Reserves
*Prescribed burning
*Buffer talus

Concerns:

Carbon accounting

Although this project draft EA does include an extensive Climate Change Report, to date Mt. Hood National Forest has not yet begun quantitative analysis of the carbon impacts of proposed vegetation management projects. The introduction to the Climate Change Report states, "A project of this size would make an extremely small contribution to overall emissions." However, without quantitative analysis, the cumulative impacts of vegetation management projects forest-wide cannot be measured.
Therefore, I urge Mt. Hood National Forest to implement quantitative analysis of the carbon impacts of all proposed vegetation management projects.
Shelterwood Alternative

The Shelterwood Alternative proposes to remove the majority of trees, reducing canopy cover to 15%, on 289 acres. The area in which this treatment is proposed is high-elevation cold forest, dominated by mountain hemlock with many areas having no history of previous logging. These units are suitable habitat for Northern Spotted Owl.

While this alternative would fulfill one aspect of the Purpose and Need by generating more timber, it would also have significant negative impacts:
*Downgrading 289 acres of suitable habitat for Northern Spotted Owl.
*Elimination of 289 acres of high-elevation cold forest.
Within the vicinity of the proposed shelterwood treatment, nearby areas show the effects of past treatments. Unit 62, on either side of the 4860 road and surrounded by proposed shelterwood units, has had recent heavy logging, and has regrown as a dense stand of mixed conifers including lodgepole pine. Unit 95, to the east of the 4860 road and the shelterwood units, experienced fire and post-fire salvage logging, and has also regrown as a dense stand of mixed conifers, thick with lodgepole pine. These units demonstrate the conditions that would result within 10-20 years after the proposed shelterwood treatment.

By contrast, unit 272, a shelterwood unit on the 4860 road, experienced a thinning (approx. 1980's) that left an intact overstory of mountain hemlock. This unit, although much more open than the unlogged units higher up the 4860 road, still retains the characteristics of the cold forest. This unit illustrates how the goals of addressing fuels and allowing for firefighter operations to take place on the 4860 road could be accomplished while retaining the existing forest type and NSO habitat.

The FRCC map shows these high-elevation cold forest units as within low to moderate departure from their historic fire regime.

The Fuels Specialist Report includes the following statement in support of heavy treatment of this area:
Proposed fuels treatments in the more western portion of the planning area, characterized by higher elevation mixed conifer, are designed to provide for public and firefighter safety in the event of a wildfire, as well as reduce wildfire threats to communities and resources. This area includes a National Recreation Area, areas accessing Wilderness, and Inventoried Roadless Areas, all values that members of the public would consider socially unacceptable to lose (USDA 1995).
Within this area, stand-replacing fire is part of the natural disturbance process. Members of the public would not lose these values; rather, members of the public would experience the natural disturbance process of these valued areas. Heavy logging, such as the proposed shelterwood treatment, however, would constitute a loss of the values of 289 acres of high-elevation, cold forest Northern Spotted Owl suitable habitat.

Part of the rationale for the proposed shelterwood treatment is to address the risk from fire to nearby communities. A recently published study of cross-boundary fires finds that the primary risk is for human-caused ignitions on private land to spread onto Forest Service land:

Results show that cross-boundary fires were primarily caused by humans on private lands. Cross-boundary ignitions, area burned, and structure losses were concentrated in California. Public lands managed by the US Forest Service were not the primary source of fires that destroyed the most structures.

News report summary of published research: https://today.oregonstate.edu/news/osu-research-suggests-forest-service-lands-not-main-source-wildfires-affecting-communities

Research publication: https://www.nature.com/articles/s41598-022-06002-3

Implementation of the shelterwood alternative would not address the purpose and need to improve the health and vigor of these forested stands; rather it would convert them from slow-growing mountain hemlock-dominated cold forest to a dense, highly flammable mixed-conifer forest. This change in forest composition would also fail to meet the purpose and need of reducing risks associated with high-intensity wildfires. Implementation of the shelterwood alternative would also downgrade 289 acres of Northern Spotted Owl suitable habitat, which does not meet the purpose and need to enhance, restore, and protect wildlife habitat.

For these reasons, I urge the Forest Service to not implement the shelterwood alternative.

Impact on Northern Spotted Owl habitat

Both alternatives will result in downgrading and loss of more than 1200 acres of suitable habitat for Northern Spotted Owl. The shelterwood alternative will result in the loss of 267 more acres of suitable habitat than Alternative #1. This is inconsistent with the purpose and need goal to enhance, restore, and protect wildlife habitat.

For these reasons, I urge the Forest Service to develop an alternative action that maintains current levels of suitable habitat for Northern Spotted Owl, including rejecting the shelterwood alternative, and modifying proposed vegetation treatments within remaining suitable habitat, specifically the proposal to apply VDT to stands older than 80 years within critical and suitable NSO habitat.

Temporary roads potential locations

At the time that the Grasshopper project scoping letter was released on 7/15/2019, no information was made available to the public in regard to potential locations of temporary roads. During the next two and a half years of planning, members of the public made repeated requests for this information. The Draft EA, released on 2/18/2022, anticipated the construction of approximately 17 miles of temporary roads, but still, no location information was made available. On 3/16/2022, four days before the end of the public comment period, a project map was made available showing "Areas Where Temporary Roads Are Likely or Unlikely." Four days is inadequate time for any member of the public to consider the potential impacts of 17 miles of temporary roads spread over thousands of acres.

As a member of the public who participates in the NEPA process, I understand that proposed temporary road locations mapped during the planning process are subject to revision and final placement during project implementation. It is also true that engaged members of the public provide the Forest Service with relevant on-the-ground information that we gather during our own voluntary information-gathering visits to project planning areas. Without timely access to general information regarding potential locations of temporary roads, members of the public cannot successfully engage with this aspect of the proposed actions.

For this reason, I request that the Forest Service:
*Promptly release more detailed project maps showing possible locations of temporary roads, and,
*Accept additional public comments on proposed temporary roads past the end of the comment period, and,
*In planning future projects, release this information during the earliest possible timeframe, and sooner than four

days before the end of the comment period.

Unmapped wet meadows

During the Scoping period, myself and other commenters, including Bark, provided the Forest Service with information, including photographic evidence, regarding Units 56 and 260, which are wet meadows. There is evidence of previous logging, however at this time these units are nearly entirely comprised of delicate, sensitive wet soils, flowing with year-sound surface water, with sparse conifer growth and abundant wildflowers. The entirety of unit 260 is within Riparian Reserves, and is entirely crisscrossed with surface water. Refer to Project PDC, Hydrology: no treatment would occur within 30-foot buffer of intermittent or ephemeral streams. This information and evidence was made available to the Forest Service in 2019. These units still appear on current planning maps.

I request that the Forest Service acknowledge this information that has been provided, and drop these units from the project.

R6 sensitive species

The Wildlife Report, Table 1: Status of Species, lists the R6 species Cope's Giant Salamander (Dicamptodon copei) as having no habitat and no presence within the planning area. This species was found, identified, and location data provided to the Forest Service during the scoping period by Bark. (Photographs and location data found in Bark Scoping Comments.)

I request that the Forest Service acknowledge the presence of this R6 species, conduct additional surveys for this species, and apply buffers as required for this species.

Support:

Qualitative analysis of carbon and climate issues

I support the Forest Service including a detailed qualitative analysis of carbon and climate issues, including engaging with current research, and acknowledging the complexity of these issues in these forests. This is a necessary first step toward the Forest Service moving proactively to address the role of forest management in climate change.

Units dropped/treatment areas reduced after scoping

I support the Forest Service receiving the information provided by members of the public during scoping, and responding by modifying certain areas and aspects of the proposal.

Detailed PDCs re: treatments in Riparian Reserves

I support the Forest Service developing detailed PDCs regarding treatments in Riparian Reserves.

Prescribed burning

I support the inclusion of prescribed burning in this proposal. Fire is a necessary component of the life cycles of the forests of this planning area. This is acknowledged in the Fuels Specialist Report: "There is no intent to

create conditions that remove fire from the landscape." A recent research survey published by the US Forest Service concludes that thinning alone, without the use of fire, is not sufficient to address the situation created by over a century of fire suppression.
https://www.fs.fed.us/pnw/pubs/journals/pnw_2021_prichard001.pdf

Buffer talus
I support the protection of talus areas, through the PDC specifying a 60' buffer of no mechanical treatment. Talus areas are fragile, awesome, special, and pikas need them.

Respectfully,

Mia Pisano