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Organization:

Title:

Comments: March 20, 2022

Dear NEPA Planner Ashley Popham and District Ranger Kameron Sam:

Please accept this public comment, respectfully submitted under NEPA, on the Draft Environmental Assessment (Draft EA) for the Grasshopper project.

I am a frequent user of Mt Hood National Forest for fresh air, recreation and spiritual renewal. I rely on the forest as a source of clean drinking water, air quality and carbon sequestration. I have spent many hours in the project area, both for the purposes above and also as a citizen scientist trained in forest ecology, climate science and fire ecology. I have surveyed 12 units of the project and submitted comments during scoping.

In addition to concerns I shared in my scoping comments, I have great concern about several aspects of the EA.

#### 1. Shelterwood alternative

##### A. Fire

On page 6, Section 2.1.2, Fuels Reduction states:

"Both action alternatives aim to reduce risks associated with high intensity wildfire at the project level, while also supporting strategic fuels reduction at the landscape scale..."

Section 2.0, Alternatives (page 5) states:

"The other difference between the alternatives is that Alternative 1 would reduce surface fuels to 20-25 tons per acre on these 289 acres. Alternative 2 would reduce surface fuels to 15-20 tons per acre on these same acres."

This language referring to tree biomass as "surface fuels" may imply that because the shelterwood treatment leaves less total wood, that it reduces the risk of fire in those sites. However, the opposite is true, based on general principles of ecology and physics as well as my personal observations. I have visited many sites of MHNH and other forests post burn. Greater total biomass of wood present does not translate to greater ignition, spread or intensity of fire. A log cannot be lit with a match, but a handful of needles can. Large, mature trees are less likely to ignite and more likely to survive fire. Small trees and shrubs burn more readily and spread fire faster. Small trees and shrubs outside but near the path of a fire are also more likely to die from intense heat, potentially leaving more dead fine fuel for the next fire.

The shelterwood alternative leaves only 15% canopy cover, similar to the forest treatment known as "heavy thinning".

I have observed the medium-term effects of heavy thinning in MHNH and other forests. The large areas of sunny, disturbed ground are ideal conditions for the germination and growth of seedlings. Ten to twenty years post treatment these sites typically contain dense thickets of young conifer seedlings and saplings, as well as understory shrub species. This is the opposite of the desired conditions stated. These thickets of fine fuels are the ideal conditions for ignition and spread of fire.

In the interest of reducing the intensity and spread of fire, variable density thinning from below, leaving more large mature and old trees, is far preferable.

## B. Forest health and wildlife habitat

Section 1.3, Purpose and Need for Action (page 4) states:

"[T]his project aims to:

- enhance and restore forest diversity, structure, and species composition.....
- enhance, restore, and protect wildlife habitat;"

The shelterwood treatment is more likely to reduce both biodiversity and stand structure. In addition, all 289 acres designated for shelterwood treatment are currently suitable habitat for northern spotted owl. The treatment will reduce or eliminate the suitability of these stands for NSO.

I request that the shelterwood alternative be dropped due to the impacts described above.

## 2. New Road Construction

For NEPA to be properly applied, members of the public like myself receive information about proposed actions, study the proposed action and its potential impacts, and submit comments. Accurate and detailed information is essential to public engagement in this process.

New roads typically have significant impact on adjacent ecosystems. Hydrology, wildlife travel and microclimate are a few of the aspects of forest ecology affected by the construction and ongoing presence of roads. In this project's planning process, the public has received information that new "temporary" roads will be built. The draft EA states that there will most likely be 17 miles of new "temporary" roads but gives no indication of where they will be. Members of the public cannot usefully comment on the impact of roads without having information on their location.

I request that the Forest Service release a map showing all available information on the planned or potential locations of new "temporary" roads, and open an additional 30 day comment period for proposed road building.

Support for Prescribed burning:

As I stated in my comment on Scoping, I support and applaud the inclusion of prescribed burning in this project. I encourage forest planners to prioritize pile burning, which brings far less collateral damage to the forest than techniques using heavy equipment.

Thank you for considering this comment.

Rachel Freifelder  
Portland, OR