Data Submitted (UTC 11): 10/17/2022 11:49:13 PM
First name: Rachel
Last name: Freifelder
Organization:
Title:
Comments: RE: In accordance with 36 CFR §218, I object to the Environmental Assessment ("EA") and draft Decision for the Grasshopper Restoration Project, located in the Barlow Ranger District of the Mt. Hood National Forest.
Objector's Interests: I visit and use this part of the forest for recreation, I depend on the forests of Mt. Hood for clean drinking water, and I depend on the forest for sequestration and storage of atmospheric carbon dioxide. I submitted comments during the scoping period, and on the Preliminary EA. I visited and made extensive observations and data collection in numerous units of the project, including (but not limited to) units 62, 65, 66, 201, 203, 208, 217, 223, 227 and 260.

Part 1: Fire Mitigation

Requested Relief: Change the planned treatment protocol of all LSR units currently planned for Commercial Thin to either: Variable Density Thinning from below; seedling/sapling thin; or drop. This includes units 54, 55, 56, 67, 79, 97, 260 (but see part 2), 262, and 264.

Reasons for objection: In my comments under scoping and the EA, and in prior comments on other projects, I have noted that commercial thinning as recently and currently practiced leads to conditions that promote the spread of fire. These conditions include drier microclimate; increased temperatures; increased wind speed from reduced tree canopy; and an increase in slash, needles, litter and other dry surface fuels. Furthermore, the increase in space and sunlight fosters thick growth of young tree seedlings and understory species, which in turn increase the availability and continuity of fine fuels to feed fire. This contradicts the stated project goal of reducing the danger and spread of fire.

The EA Vegetation report, sections 3.2.2 and 3.2.3, all figures but especially Figures 5, 6, and 9, accurately portray what I and other commenters have observed on the ground in commercially thinned sites, years after treatment: an abundance of fine fuels and ladder fuels provide by thick growth of conifer seedlings and saplings. (In these figures the understory is portrayed as exclusively conifer seedlings and saplings, whereas in a typical stand this regrowth will also include fine fuels in the form of shrubs and forbs. The figures also do not show the increase in small litter surface fuels.) Compare this to Figure 4, which shows a schematic of a mature forest, well understood by the best science to be more fire resistant than an early seral forest. Ladder fuels are absent in this figure. This is similar to what is typically observed on the ground, though the figure does not show other old-growth characteristics such as large moisture-holding down wood, or deep moisture-holding soils, which also serve to retard fire.

Appendix G of the FONSI, in response to my EA comment on increased fire risks, states that "With a shelterwood treatment (Fuels Report section 4.2.3), regeneration is to be expected". This regeneration is that regrowth of seedlings. The same paragraph incorrectly asserts that "a "combination of further reducing surface fuels, and less natural recruitment after a shelterwood, provide for sustained effectiveness of the fuels reduction treatment"." There cannot be simultaneously "regeneration" and "less natural recruitment."

LSR units are the most fire resistant, and maintaining their fire resistance is critical to protecting the forest as a whole, and adjacent communities, from increased risk and spread of fire. This it is necessary to reduce harvest treatments in all units and especially LSR units to sustainable levels that maintain shade and moisture and do not encourage the recruitment of ladder fuels. Lighter and more sustainable harvests can still provide wood products and income for communities near the forest.

This information has been provided to the agency since 2019 with regard to this project, and previously with regard to other projects that state fire management as a goal, by myself and other commenters. These concerns have been raised, and have not been addressed.
I raised these concerns in my scoping comments and in my comments on the EA on the incorrect predictions of regrowth and of fire behavior that NFS has used to plan commercial thinning operations.

Part 2: Wet meadow protection

Requested Relief: Drop Unit 260.

Reason for objection:
This unit is designated LSR and Riparian Reserve, and is within the NRA. It is entirely comprised of wet meadow and contains extensive wet soils and surface water, both year-round and seasonal.

The EA excludes this unit from the PDCs developed for treatment within Riparian Reserves, and designates it for Intermediate Commercial Thinning/Plantation treatment, without explanation or rationale for this change in designation.
Furthermore, the following PDCs should apply to this unit, regardless of its exclusion from Riparian Reserve treatment.
From the EA, Appendix A, PDCs, page 3, Soils, #8: Meadows identified on pre-sale maps would be protected by not allowing new temporary roads, landings or ground based equipment to operate within the delineated area.
From the EA, Appendix A, PDCs, page 7, Hydrology, #6: No ground-based equipment would operate, and no new temporary road construction or new landings would occur within 100-feet of streams, seeps, springs, or wetlands. However, where pre-existing temporary road alignments or landings exist they may be utilized as long as they do not intersect any perennial stream, spring or wetland and are not hydrologically connected to these features. If water is present at intermittent or ephemeral streams, watershed personnel will work with the timber sale administrator to facilitate crossing solutions.
These PDCs would exclude the entirety of Unit 260 from treatment with ground-based equipment. If these PDCs are applied, as they must be, then Intermediate Commercial Thinning/Plantation treatment is excluded from Unit 260.

This information has been provided to the agency since 2019, by myself and other commenters. These concerns have been raised, and have not been addressed.
I raised these concerns in my scoping comments on the conditions within this unit.

I would welcome a productive pre-decisional objection resolution meeting with agency staff. If you have any clarifying questions about this objection, please don't hesitate to contact me.

Thank you,
Rachel Freifelder