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First name: CHRISTOPHER
Last name: KORWIN
Organization:
Title:
Comments: Re: Comments on Proposed Lost Lake Late-Successional Reserve Acreage Swap
File Code: 1950

Hello Mr. Abbas,
I am writing to provide comments on the proposed amendment to the Mt. Hood National Forest Plan regarding the Lost Lake Late-Successional Reserve (LSR) Acreage Swap. After reviewing the Notice of Proposed Action (August 13, 2025), I respectfully submit the following concerns and request that Lost Lake remain within LSR #RO-201.

1. The LSR Objectives Still Apply at Lost Lake
The Northwest Forest Plan explicitly recognizes that dispersed and developed recreation can occur within LSRs, provided such use does not prevent or significantly retard attainment of late-successional conditions (NFP, p. C-18). The forests surrounding Lost Lake continue to provide important connectivity and structural habitat for species such as the northern spotted owl and potentially the gray wolf. Removing the LSR designation fragments the reserve network and undermines its long-term ecological integrity.

2. Fire and Hazard Tree Management Can Occur Within an LSR
The Notice of Proposed Action states that LSR rules constrain defensible space and hazard tree management. However, the Northwest Forest Plan allows for fuel treatments and hazard tree removal when necessary for public safety. The real issue is the absence of a management assessment for LSR #RO-201, as required under the NFP (p. C-11). Preparing such an assessment would enable the Forest to carry out needed fire mitigation without sacrificing LSR protections.

3. Precedent and Cumulative Impacts
The proposal cites Lost Lake as "poor quality habitat" due to heavy recreation use. Accepting this rationale for removal sets a concerning precedent. If each developed site within an LSR is excluded on these grounds, the reserve network will be incrementally eroded, diminishing its intended function as a cohesive system for late-successional species.

4. Unique Riparian and Lakeshore Values
The Lost Lake LSR includes approximately 98 acres of Riparian Reserves. Although the Riparian allocation would remain, the overlapping LSR designation provides stronger ecological protection. Lakeshore forests are particularly valuable as climate refugia, amphibian habitat, and sources of structural complexity (snags, downed wood). Removing the LSR increases the risk of intensified recreation development, degrading this sensitive interface.

5. Cultural and Historic Resource Protection
Lost Lake Resort's historic district has been deemed eligible for the National Register of Historic Places. Retaining the LSR designation would provide an additional layer of protection by reducing development pressure and ensuring that historic and cultural resources remain embedded within an intact forest setting.

6. "Trade-In" Parcels Are Not Ecologically Equivalent
The proposed trade-in lands are primarily steep, remote, higher-elevation forests that already face limited development pressure. While the swap results in a 5:1 acreage gain, these areas are not functionally equivalent to the accessible, low-elevation, mixed-conifer and riparian habitats of Lost Lake. The value of Lost Lake to the

LSR network cannot be replaced by acreage alone.

7. Climate and Long-Term Conservation Goals
The LSR system was designed to ensure long-term biodiversity conservation under changing conditions. Retaining unique lake-shore old-growth and mid-elevation forest within the LSR enhances climate resilience and provides vital habitat continuity. Removing it weakens the Forest's ability to meet long-term commitments under the Northwest Forest Plan.

Conclusion
For these reasons, I urge the Forest Service to retain the Lost Lake recreation area within LSR #RO-201. The management challenges identified can be addressed through existing LSR mechanisms, including preparation of a management assessment, without removing critical lands from the reserve network.

Thank you for considering these comments.

Sincerely, Christopher Korwin