

Lava Restoration Concerns

For Oregonians and visitors alike, Mt. Hood embodies the essence of Northwest Oregon's outdoor spirit. As long-time Oregonian and hiking enthusiast, I feel we must work hard to protect the Mt. Hood ecosystem from damage to fish, wildlife, and recreational value.

The 13,800 acre Lava project represents a threat to four Mt. Hood watersheds and land that Oregonians hold dear. The Preliminary Assessment states that "*The overarching purpose of the project is to improve the forest conditions within the West, Middle and East Fork Hood River Watersheds.*"

Although characterized as a restoration project, the majority of "vegetative treatments," involve mechanized, commercial logging in sensitive areas. The introduction of temporary roads, landings and heavy equipment will damage and disrupt the watersheds. Although there are extensive BMP's and mitigating actions, the Forest Service has not yet demonstrated that such measures will be implemented consistently. In fact, the sheer volume of these provisions is such that full and complete monitoring will likely overwhelm available staffing resources.

My concerns are that the project area is matrix, but is surrounded by and contains sensitive areas including:

- Wild and Scenic River and LSR on the East
- Wilderness, Inventoried Roadless Areas, Riparian Reserves and LSR on the South
- Riparian Reserves on West
- LSR in the North and Central part of the project area

Potential conflicts and risks to soil, watersheds, wildlife, and recreation are inherent in the following:

- Units 1 and 48 are within Wild and Scenic, Recreational River Corridor
- Huckleberry Enhancement Unit 52 bordering and Unit 53 adjacent to Mt. Hood Wilderness
- Commercial Firewood Unit 51 borders on Mt. Hood Wilderness
- Units 32, 33, 27 and 55 are adjacent to LSR
- Use of Vista Ridge Trailhead as a landing; users of this, and other trails will be exposed to noise, smoke, and altered stand appearance
- Unit 54 contains 100 year old trees and has not been previously logged

- Units 32, 33 and 43 are within Pileated Woodpecker/Pine Marten habitat; Units 20, 25, 26 and 27 are adjacent with potential for further fragmenting these areas
- Bull trout habitat in Red Hill Creek, which will be crossed by proposed log haul route
- Skidders, dozers and feller-bunches will be allowed in Riparian Reserves

Ecosystem damage can be expected as a result of construction of temporary roads, landings and skid trails. Operation of vehicles and machinery will contribute to soil compaction, air pollution, water contamination, and spread of invasive plants.

Who can assure 24/7 that all vehicles and equipment remain free of oil or fuel leaks, have adequate absorbent materials and are parked 150 feet away from water courses?

The proposed treatments, i.e. five-acre gaps have not been proven to be effective in restoring forests. In addition, the logging companies evidently have broad discretion regarding how to apply the skips and gaps; and which trees to leave. Without resource-intensive monitoring, we cannot expect that companies will comply with BMP's or other actions that increase costs and/or reduce profits.

As described above, there are unacceptable risks of damage to watersheds, fish, wildlife and recreation. If the objective is truly "improve forest conditions", this project should be cancelled or limited. Thank you for your consideration of these concerns.

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