EXECUTIVE SUMMARY OF BARK'S COMMENTS ON THE MT. HOOD NATIONAL FOREST'S PROPOSED POLALLIE COOPER TIMBER SALE.

"Treatments cannot reduce fire severity and consequent impacts, if fire does not affect treated areas while fuels are reduced." *- Rhodes & Baker*[1]

The Forest Service proposes to log 2,830 acres and build 12 miles of roads (8 new and 4 rebuilt) in the East Fork Hood River watershed for the purpose of "reducing the fire hazard in order to protect life and property and to restore forest to conditions that are more resilient to wildfire on National Forest Lands."

1) The project includes logging and road building in the Wild & Scenic River Corridor, the Crystal Springs Watershed Management Unit, Northern Spotted Owl Critical Habitat and the proposed Tamanawas Falls Wilderness. These areas are not appropriate for a large scale commercial logging operation.

2) Approximately 1,800 acres proposed for commercial logging includes mature, old growth or never-logged forest, and 50% of project is in Fire Regime Condition Class (FRCC) #1, where fire regimes are within or near their historical range.

3) Fuels reduction cannot guarantee less severe fires:

- Because weather is often the greatest driving factor of a forest fire, and because the strength and direction of the wildfire is often determined by topography, fuels reduction projects cannot guarantee fires of less severity. [2] [3]
- Research suggests that fuel reduction may actually increase fire severity, as such projects leave behind combustible slash, open the forest canopy to create more ground-level biomass, and increase solar radiation which dries out the understory, and increases wind speed.

4) Road density is known to increase fire ignition:

[1] Rhodes, J. and Baker, W. 2008. Fire Probability, Fuel Treatment Effectiveness and Ecological Tradeoffs in Western U.S. Public Forests. The Open Forest Science Journal, 2008.

[2] Carey, H. and M. Schumann. 2003. Modifying Wildfire Behavior–the Effectiveness of Fuel Treatments: the Status of our Knowledge. National Community Forestry Center.

[3] Rhodes, J. and W. Baker. 2007. The Watershed Impacts of Forest Treatments to Reduce Fuels and Modify Fire Behavior. Pacific Rivers Council, Portland Or.

- Roadless areas generally have lower potential for high-intensity fires than roaded areas, in large part because they are less prone to human caused ignitions[4] [5] [6].
- Wildland fire ignition is *almost twice as likely to occur in a roaded area* as in a roadless area, and the median size of large fires on national forests is greater outside of roadless areas.

5) Fuel treatments only have a mean probability of 2-8% of encountering moderate- or high- severity fire during the assumed 20-year period of reduced fuels.[7] Even if fuel treatments were very effective when encountering fire of any severity, treatments will rarely encounter fire, and thus are unlikely to substantially reduce effects of high-severity fire.[8]

6) There are seven spotted owl home ranges that would be adversely affected by the project:

- The sale would degrade 687 acres of nesting, roosting, or foraging habitat in order protect it from loss in a hypothetical future fire.
- The strategy of trying to maintain more dense, late-successional forest habitat by reducing fire does not work because the method for reducing fire adversely affects far more of this forest habitat than would high-severity fire.[9]
- Reducing the canopy creates new habitat for the very competitive Barred Owl, who are known to be in the area.

7) The Polallie Cooper timber sale does not comply with the management directions of the 2009 Omnibus Bill:

- While allowing active management in the service of restoration, the act specifically prohibits constructing new roads, or renovating of existing non-System roads, and projects undertaken for the purpose of harvesting commercial timber.

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[4] DellaSala, D.A.; Olson, D.M.; Barth, S.E.; Crane, S.L.; Primm, S.A. 1995. Forest health: Moving beyond the rhetoric to restore healthy landscapes in the inland Northwest. Wildlife Society Bulletin 23(3): 346−356.

[5] USDA Forest Service. 2000. Forest Service roadless area conservation. Draft environmental impact statement. Vol. 1. Washington, DC: USDA Forest Service.

[6]Weatherspoon, C.P.; Skinner, C.N. 1996. Landscape-level strategies for forest fuel management. Pages 1471−1492, in: Status of the Sierra Nevada: Sierra Nevada Ecosystem Project, final report to Congress. Vol. II. Assessments and Scientific Basis for Management Options. Wildl. Res. Ctr. Rep. No. 37. Davis, CA: University of California− Davis, Center for Water and Wildland Resources.

[7] *Id.*

[8] *Id.*

[9] Odion, D., Hanson, C., DellaSala, D., Baker, W, & Bond, M., 2014, Effects of Fire and Commercial Thinning on Future Habitat of the Northern Spotted Owl,The Open Ecology Journal, 7, 37-51.

- Despite these prohibitions, the proposed Polallie Cooper Timber Sale would **construct 1.4 miles of new road and renovate 3.26 miles of existing temporary roads** and commercially log 782 acres in the Crystal Springs Management Unit

8) The Forest Service attempts to minimize the impact of roads by deeming them "temporary":

- Even temporary road construction can cause resource damage including erosion and sedimentation, exotic species spread and disruption of wildlife for many years after decommissioning [10] [11]
- Bark's post-logging monitoring in Mt. Hood National Forest found numerous instances of temporary roads left open, with no erosion control measures, many seasons after logging had been completed.

9) The project includes logging, road building and helicopter landings in Riparian Reserves, which does not complying with the Aquatic Conservation Strategy objectives to manage the riparian dependent resources to *maintain* the existing condition or implement actions to *restore* conditions.

10) The project affects many popular trails and recreation areas, which are inadequately protected:

- Logging would affect the Tamanawas Falls, Dog River, and Tilly Jane trails, which are some of the most popular trials in the Hood River Ranger District.
- Trails only have a 55-foot buffers, rather than the 100 ft. buffer requested by local recreation groups.
- Closures for logging operations will also affect access to rock climbing, rafting & kayaking, hiking and mountain biking in the project area.

11) The Pollalie Cooper Timber Sale is significant and should be analyzed in an EIS. Forest Service must prepare an EIS if "the agency's action *may* have a significant impact upon the environment." Significance factors include:

- Unique characteristics of the geographic area such as proximity to historic or cultural resources, wild and scenic rivers, and ecologically critical areas
- adverse impacts to an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act

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[10] Trombulak, S.C. and C.A. Frissell. 2000. Review of ecological effects of roads on terrestrial and aquatic communities. Conservation Biology 14:18-30.

[11] Beschta, R.L., Rhodes, J.J., Kauffman, J.B., Gresswell, R.E, Minshall, G.W., Karr, J.R, Perry, D.A., Hauer, F.R., and Frissell, C.A., 2004. Postfire Management on Forested Public Lands of the Western USA. Cons. Bio., 18: 957-967.

- Significant cumulative impacts when assessed with the Red Hill & Lava Timber Sales, as there is 6,400 nearly contiguous acres of logging across the West, Middle and East Forks of Hood River.

In light of all the significance factors present, it is hard to imagine what type of project does have a significant impact on the environment if the proposed Polallie Cooper Timber Sale does not.

For all the reasons described above, the Polallie Cooper project is simply not the right project to meet the Forest Service's stated Purpose and Need. Bark believes the best course of action is to follow you're the Forest Service's actions in 2005 and cancel the project in its entirety.