



**Re: Polallie Cooper Hazardous Fuels Reduction Project
Comments on February 13, 2015 Scoping Notice**

Dear Ranger Tervo,

I write on behalf of the Cooper Spur Wild & Free Coalition and its member groups (Oregon Wild, Oregon Chapter of the Sierra Club, Friends of Mt. Hood, Mazamas, Lower Columbia Canoe Club, Oregon Kayak and Canoe Club, Friends of Mount Hood, BARK, Audubon Society of Portland, Northwest Environmental Defense Center, Ptarmigans, Oregon Nordic Club, Friends of Tilly Jane) to ask the Forest Service to significantly scale back its plans to log the public lands located on the North side of Mt. Hood. The scoping notice states that the project will be consistent with the Crystal Springs Watershed Special Resources Management Unit, but based on a review of the proposed actions it is far from it.

Your scoping notice states that the purpose and need of the Polallie Cooper Hazardous Fuels Reduction Project is to:

- Reduce or maintain levels of hazardous fuels, including surface, ladder, and crown fuels to reduce the risk of unwanted effects of wildfire on NFS lands and adjacent privately owned land;
- Create defensible space in the communities throughout the WUI to meet the objectives and goals of the CWPP;
- Move the landscape toward more historic conditions to reduce fuel loading and restore forest resiliency;
- Reduce the risk of large stand replacing events using management strategies such as thinning overstory and understory trees (thinning from below), prescribed burning, piling and burning, masticating of underbrush, reducing down woody fuels, and swamper burning; and,
- Move tree species composition to a higher proportion of fire tolerant ponderosa pine, western larch and Douglas-fir.

A copy of the Crystal Springs Watershed Special Resources Management Unit (Management Unit) is attached as Exhibit A to this letter. The express purposes of the Management Unit is:

(A) to ensure the protection of the quality and quantity of the Crystal Springs watershed as a clean drinking water source for the residents of Hood River County, Oregon; and

(B) to allow visitors to enjoy the special scenic, natural, cultural and wildlife values of the Crystal Springs watershed.

The focus of activities in the CSWSR Management Unit is to occur on:

- A. Land within 400 feet of existing structures on public or private land, and
- B. Land within 400 feet of the Cloud Cap Road.

For land that is not within 400 feet of structures the work is to be prioritized by focusing on activities that restore previously harvested stands, including the removal of logging slash, smaller diameter material and ladder fuels.

The legislative direction for the Management Unit specifically prohibits:

“(A) New road construction or renovation of existing non-system roads, except as necessary to protect public health and safety” and

“(B) Projects undertaken for the purpose of harvesting commercial timber...”

The scoping notice states that a “suite of activities” are proposed to “treat approximately 2,960 acres of the planning area or approximately 40% of the landbase.” Contrary to the express legislative direction, the scoping notice states that tree thinning would be pursued including the commercial sale of vegetative material. The scoping notice states that there would be 1,900 acres of logging on “recently unmanaged” stands. The Forest Service’s use of this term to describe largely undisturbed native forests is troubling. What is even more troubling is that the scoping notice says that the average canopy closure in native forests will be reduced to between 35 to 60 percent – essentially logging half to 2/3rds of native forests and converting them into forests that will require continued maintenance. The impact of this heavy handed logging proposal on scenic values, wildlife values, etc. will be immense. The scoping notice admits that the project will take large overstory trees, not just focus on removing logging slash, smaller diameter material and ladder fuels.

The specific purpose of the legislation was to protect larger, older trees because it is these larger older trees that are best able to withstand fires. Yet the scoping notice admits that the Forest Service is proposing to log merchantable timber from native forests in contravention of the direction in the CSWSR Management Unit. The scoping notice says nothing about how the actions will retain older, larger forest structure. There are no diameter limits on the logging activities in the euphemistically named “recently unmanaged” stands or in the

“plantations.” There are no maps or descriptions of which stands are within 400 feet of structures or the Cloud Cap Road.

The Forest Service also proposes to build 8 new miles of roads in the project area and rebuild another 4 miles on existing roadbeds despite the clear prohibition in the CSWSR Management Unit against the construction of new roads. While these roads may be temporary as to their use by the logging equipment that is employed for the project, they will not be temporary as to their impacts on the landscape and they will provide vectors for the introduction of fire, off-road vehicle use in the Crystal Springs Watershed.

The purpose of all activities in the watershed must be to protect water quality and quantity and to preserve the area for the special natural, scenic and wildlife values that are found there. Congress has directed that the purpose of this land is not to provide merchantable timber.

The Forest Service should halt work on this project right now, and sit down with leaders from the conservation community who worked for so many years to protect the North side for present and future generations to provide a framework for moving forward with work to create defensible space and work to restore ecological resilience to plantations. The conservation community is prepared to support non-commercial work to create defensible space around structures on public and private lands, and near the heavily traveled Cloud Cap Road. The conservation community cannot, and will not sit by as the Forest Service proposes to engage in heavy commercial logging that will remove up to 70% of the overstory in native forests on the North side of Mt. Hood.

The Cooper Spur Wild & Free Coalition also joins in the comments submitted by its member groups, including, but not limited to, the comments submitted by the Hood River Valley Residents Committee, Oregon Wild, BARK, and others. We hope that you will take the time to carefully consider these comments and, in so doing, that you will reconsider the scope of this project before investing more taxpayer money into it. Thank you for incorporating this input in your planning.

Regards,
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