

## **How does the proposed Polallie Cooper Timber Sale interact with the Crystal Springs Watershed Special Resource Management Unit?**

According to the Omnibus Bill of 2009, the purposes of the Management Unit are:

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

Active management can occur to “protect the water quality, water quantity, and scenic, cultural, natural, and wildlife values of the Management Unit,” with treatments to **maintain and restore fire-resilient forest structures containing late successional forest structure characterized by large trees and multistoried canopies**, as ecologically appropriate, on land:

- in any area located not more than 400 feet *from structures* located on National Forest System land or adjacent private land;
- in any area located not more than 400 feet from the Cooper Spur Road, the Cloud Cap Road, or the Cooper Spur Ski Area Loop Road; and
- on any other National Forest System land in the Management Unit, with **priority given to activities that restore previously harvested stands**, including the removal of logging slash, smaller diameter material, and ladder fuels.

Prohibited activities in the Management Unit include:

- New road construction or renovation of existing non-System roads, except as necessary to protect public health and safety;
- Projects undertaken for the purpose of harvesting commercial timber (other than activities relating to the harvest of merchantable products that are byproducts of activities conducted to further the purposes of the Management Unit).

Despite the prohibition on road building, the proposed Polallie Cooper Timber Sale would **construct 1.4 miles of new road and renovate 3.26 miles of existing non-system (temporary) roads** in the Crystal Springs Management Unit.<sup>1</sup> *EA at 50.*

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<sup>1</sup> In direct contradiction of its own plans, the Environmental Assessment makes the following statement: “For prohibited activities, the Proposed Action *does not include any plans to construct new roads or renovate existing non-System roads*. The agency does not consider temporary roads to be new road construction since the roads would not be included in the road

In addition, Polallie Cooper **would log 782 acres of commercial timber in the management unit.** Is this logging a byproduct of activities conducted to *further the purposes* of the management unit?

According to the Environmental Assessment, of the 782 acres, approximately 595 are outside of the 400-foot buffer<sup>2</sup>; 119 acres are older, never logged forest, 274 acres are in plantations and 202 are in “sapling management”. Most of the Crystal Springs Management Unit is in Fire Condition Class 1 or 2, which means that it is either within its current fire regime or is moderately altered from its historic regime. *EA at 83.*

The Forest Service proposes to use ground-based methods of fuels reduction, including machine piling, burning of activity fuels, construction and increased use of roads and landings, all which are known to increase soil erosion, compact soils and elevate surface runoff. Elevated sediment delivery to streams contributes to water quality degradation that impairs aquatic ecosystems.<sup>3</sup>

The Forest Service suggests these impacts are justified because they will reduce the severity of a fire in the watershed. However, study results indicate fuel reduction treatments, on average, would **not** have the potential to reduce fire impacts on aquatic systems in 83.5%-92.8% of the areas treated.<sup>4</sup>

Thus, by logging and road building in Crystal Springs Management Unit, the Polallie Cooper Timber Sale will trade adverse impacts to water, wildlife and the natural value of the watershed, for the very slim likelihood of reducing fire impacts on aquatic systems.

**The Polallie Cooper Timber Sale does not comply with the management directions of the 2009 Omnibus Bill.**

However, for the past five years, the Forest Service has unreasonably delayed implementation of another portion of the Bill, the Mt. Hood Meadows Land Exchange, making the Crystal Springs Management Unit Protections *not legally enforceable*. Thus, the Forest Service has created the conditions that give it impunity to violate these important protective standards.

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system, and the impacts from temporary road use are minimized through the use of project design criteria and best management practices. *EA at 19.*

<sup>2</sup> The EA misinterprets the standard “land within 400 feet of existing structures on public or private land” as “within 400 feet of the property boundary.” *EA at 50.* The EA does not include any maps of this work, so it is unclear whether this misinterpretation affects the project design.

<sup>3</sup> 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, 1.

<sup>4</sup>*Id* at 5.