Dear Supervisor Northrop,

Thank you for your March 21 letter, which clarifies Mt. Hood National Forest’s position concerning the proposed Polallie Cooper Hazardous Fuels Reduction Project. While we appreciate the timely response, your response did not address many of our, and our constituents, concerns about the project and raises some new questions.

**Hazardous Fuels Reduction**

Your letter states that “Current conditions in the project planning area have resulted in a very real threat of a large scale fire that is likely to be outside the range that historically occurred on the landscape.” While we recognize that fire suppression has altered the landscape on Mt. Hood National Forest, and appreciate the work your agency is doing to address this issue, we are also aware that over half of the proposed project area is in Fire Regime Condition Class #1, in which the forest is within or near its historical fire regime.

In addition,  approximately 1,800 acres proposed for commercial logging includes mature, old growth or never-logged forest, which is known to be more fire resilient than young, densely planted second growth plantations. Much of this older forest is in roadless areas, which are half as likely to burn from human ignition than roaded forests.

*Why has the Forest Service planned a fuels reduction project in areas that are within their natural fire regime? Why does the fuels reduction project include almost 2,000 acres of older, more fire-resilient, native forest? How are you accounting for the increased risk of ignition from new access roads?*

**Crystal Springs Management Area**

Thank you for clarifying the Forest Service’s understanding of the intentions and limitations in the 2009 Omnibus Bill as regards the Crystal Springs Watershed Special Resources Management Unit. However, your understanding and interpretation of this legislation differs from the intent of the lawmakers that crafted and passed this bill.

The purpose of the bill was to protect the drinking watershed and allow visitors to enjoy the special scenic, natural, cultural, and wildlife values of the Crystal Springs watershed. The bill prioritize fuels treatments within 400 feet of existing developments, and – outside of that buffer– prioritizes removing slash piles, ladder fuels and small diameter trees. Your letter mentions that 20% of treatment within the Crystal Springs Unit is in recently unmanaged stands, and that roughly 80 of these 120 acres are within 400 feet of private land and have missed at least one fire return interval.

*Could you please provide our offices with a map of the Crystal Springs Unit that includes unit boundaries with the 400-foot buffer included, fire regime condition class, management prescription, and stand age?*

**Road Building in the Crystal Springs Management Unit**

As you know, the 2009 Omnibus Bill intended to prohibit road building in the Crystal Springs Unit, except under very limited circumstances. In your letter, you explain the Forest Service’s position that unless a road is included in the Forest Service Road System or Travel Atlas, you do not consider it a road. However, the Travel Management Rule defines a Road not by whether it is included in a specific database, but by its function: a road is “a motor vehicle travelway over 50 inches wide, unless designated and managed as a trail.” 36 CFR §212.1.

While you are correct that Temporary Roads defined by whether or not they are included in a forest transportation atlas, this does not change the fact that they are, first and foremost, roads. The 2009 Omnibus Bill prohibits new road building in the Crystal Springs Management unit, period.  It does not specify that the road building need be a system road, or be permanent, simply that it be a road.

In addition, your response does not address that the Omnibus Bill also prohibits renovating existing non-system roads.  “Existing non-system roads” is not defined by the Travel Management Rule, but it seems to mean a road that exists on the landscape and is not part of the Forest Service Road System.  This would include the 3.3 miles of existing temporary roads that the Forest Service plans to renovate in the Crystal Springs Management Unit.

*Please explain your understanding of the prohibition on renovating existing non-system roads, and how the proposed project complies with this prohibition.*

**Impact to Recreation**

The Polallie Coooper Fuels Reduction project, as proposed, 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. While your letter states that the trails will have visual buffers, we have heard that the trails will only have a 55-foot buffers, rather than the 100 ft. buffer requested by local recreation groups.

*Why did the Forest Service chose trail buffers smaller than the local hiking community requested?*

Erik – do you want to write the response to their complete disregard of the proposed wilderness area?

**Collaborative Solutions**

We appreciate the Forest Service’s acknowledging the importance of creating collaborative solutions for public land management. We believe that the 2009 Omnibus Bill is one of the best examples of such collaboration in the history of land management on Mt. Hood National Forest, yet many of the key stakeholders who created that agreement have strong concerns about this project as proposed, and its impacts on the landscape protected by the Bill. Not least of these is the fact that the Government Camp/Cooper Spur Land Trade is not yet complete, which renders the other portions of the Omnibus Bill legally unenforceable.

While we commend the Forest Service for committing to adhere to the protections of the entire Bill, we believe that the public interest would be better served by the Forest Service first completing the Land Exchange, and then moving forward with a revised Polallie Cooper Fuels Reduction Project that addresses the many concerns raised by local residents, recreationalists, conservation groups and others who are invested in this area.