Dear Supervisor Northrop,

Thank you for your March 21 letter clarifying the 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.

**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 far less likely to catch fire 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 our legislative intent with the 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 prioritizes 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 states that 20% of the 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 supports this statement, including unit boundaries with the 400-foot buffer included, fire regime condition class, management prescription, and stand age? Could you please provide us with a map showing the areas that will be protected after the completion of the land trade overlapped with the proposed areas for logging and roadbuilding?*

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

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. T 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. Please also explain why you believe temporary roads are not at any point real roads and thus prohibited by the 2009 Omnibus Public Lands bill.*

**Impact to Recreation Trails**

The Polallie Cooper Fuels Reduction project, as proposed, would affect the 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 buffer, rather than the 100 ft. buffer requested by local recreation groups.

*Why did the Forest Service choose trail buffers smaller than the local hiking and biking community requested?*

**Potential/Proposed Wilderness Areas**

While we understand that there is not currently Wilderness protection afforded the Tamanawas Falls area we are concerned that you are too quickly dismissing this public concern. This area has a number of roads proposed as well as logging and has served to significantly increase the level of controversy in this project. We encourage you to focus this project on areas of agreement and consensus rather than areas with high levels of controversy.

Your most recent letter on this topic to our offices states that “Currently, there is a portion of an addition to the Mt. Hood Wilderness that will be included in the National Wilderness Preservation System upon the completion of the Government Camp – Cooper Spur land exchange. No fuel reduction treatments or temporary roads are proposed in this wilderness addition.” By our read this statement is incorrect. Your maps show very clearly that part of the “Potential Wilderness” in section 7 (township 2S, range 10E), directly east of the Cooper Spur Ski Area is indeed proposed for logging.

**East Fork Wild and Scenic River**

As with other elements of this proposal, we are concerned that the proposed logging is located in areas we intended to protect in the 2009 Public Lands Omnibus Bill. To claim that significant logging and some road building in the protected river corridor will have no impact on the hydrology of the area misses the mark. Again, this is another significant example of advancing controversial projects instead of advancing consensus based projects.

**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 the Mt. Hood National Forest, yet many of the key stakeholders who created that agreement are opposed to this project, 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 several other portions of the Omnibus Bill legally unenforceable.

We encourage citizens and communities to come together on all sides of the mountain to collaborate, and are encouraged to see a history of progress in this arena. Thus we are disappointed to learn of the lack of collaborative agreement reached on this project. We understand consensus was not achieved with the stakeholders involved and that the process was rushed and broke down as recommendations were being finalized, resulting in at best a questionable end product that has eroded trust.

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 completing the Land Exchange and ensure all parts of the 2009 Omnibus Bill are fully enacted. Only then, when the land management structure intended by the legislation is in place, should the Forest Service move forward with a revised Polallie Cooper Fuels Reduction Project that builds upon the previously created consensus, and addresses the concerns raised by local residents, recreationalists, conservation groups and others invested in this special area.