Dear Senator Wyden and Congressman Blumenauer:

I am in receipt of your letter dated March 7, 2016 expressing concerns about the impact of the Mt. Hood National Forest’s recently proposed Polallie Cooper Hazardous Fuels Reduction Project on the Crystal Springs Watershed Special Resources Management Unit (“Crystal Springs Unit”) established by the Omnibus Public Lands Management Act of 2009 (“the Omnibus Act”). I am aware of and appreciate the many years of collaboration between the communities in Government Camp and Hood River Valley with respect to the establishment of the Crystal Springs Unit.

We at the Mt. Hood National Forest take our responsibility seriously to ensure the protection of the Crystal Springs Unit as a clean drinking water source for the residents of Hood River County, Oregon. By way of this letter, I will respond to the concerns you raised about the Polallie Cooper Hazardous Fuels Reduction Project within the Crystal Springs Unit and the Wild and Scenic East Fork of the Hood River. Lastly, I will address your concerns about the potential Wilderness area.

Forested lands act as a natural water filter and storage system. They keep water clear, regulate streamflow and reduce flooding. When damaged by catastrophic fire, forests lose their ability to absorb and filter rainfall. The consequences can be runoff that fouls streams and rivers with mud, soil, and debris, contaminating the water supply. Almost 64 million Westerners get their clean drinking water supply from surface water that comes from Western forested lands. Simply put, if these forests aren’t protected, our water supply is at risk.

I assure you that the Polallie Cooper project was designed to not only meet the requirements stated in the Omnibus Act, but to also protect the many important ecological and social values associated with the area. 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. A portion of this project planning area is within the wildland urban interface (WUI), as identified by the 2006 Hood River County Community Wildfire Protection Plan, and is the last untreated WUI in Hood River County. Therefore, the primary purpose of this project is to reduce the fire hazard in order to protect life and property and to restore forest conditions that are more resilient to wildfire. I believe that this project ensures the future protection of the many
important resources identified in the Omnibus Act. For your reference, the following website
links to the draft Environmental Assessment (“EA”) for the Polallie Cooper Hazardous Fuels
Reduction Project (http://www.fs.usda.gov/project/?project=40687). Also included is a print out
of the main body of the EA and its appendices for your use.

**Fuel Reduction Treatment in the Crystal Springs Unit**

While the establishment of the Crystal Springs Unit is contingent upon the completion of the
Government Camp – Cooper Spur land exchange, I fully understand that the Forest Service
cannot conduct any management actions that would prevent this land from future designation as
described in the Omnibus Act. As such, we have used the direction proposed for the Crystal
Springs Unit when developing the proposed treatments for Polallie Cooper.

The purposes of the Crystal Springs Unit are:

“(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.”

As previously stated, the purpose of the project is to move the landscape toward more historic
conditions by restoring forest resiliency. By reducing fuel loading and restoring forest structure
to historic conditions, the project would increase the quantity of water available in the watershed,
and reduce the risk of impacts from wildfire on the quality of water as a clean water source for
the residents of Hood River County.

This desire has been reiterated and supported by the Crystal Springs Water District in a letter to
the Forest Service received on February 25, 2016 (attached). The Crystal Springs Water District
explicitly stated,

“The proposed fuel reduction plan is a step in the right direction in reducing the
potential for catastrophic wildfires that could put the quality of our water at risk.
The District supports this plan.”

Additionally, the language in the Omnibus Act outlines that the Secretary may conduct fuel
reduction and forest health management treatments in three areas:

- in any area located not more than 400 feet from structures located on—
  - National Forest System land; or
  - private land adjacent to National Forest System 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 Crystal Springs Unit, with priority given
to activities that restore previously harvested stands, including the removal of logging
slash, smaller diameter material, and ladder fuels.

The proposed action along with the areas proposed for treatment are included in the three areas outlined above. Specifically, the third bullet authorizes fuel reduction treatment on other NFS land in the Crystal Springs Unit outside of the 400 feet from structures and Cooper Spur Road, Cloud Cap Road, or the Cooper Spur Ski Area Loop Road.

For the development of the project planning area, priority was given to those areas outlined in the bullets above. For the recently unmanaged stands proposed for thinning, this accounts for approximately 120 acres (20%) of the treatment within the Crystal Springs Unit. Additionally, roughly 80 of these 120 acres are within 400 feet of private land and have missed at least one fire return interval.

By not treating these areas, not only would the NFS land be at a higher risk of catastrophic wildfire, but any fire on NFS land would put private land at an increased risk of damage from wildfire.

**Temporary Roads in the Crystal Springs Unit**

In order to achieve the objectives of the Polallie Cooper project, access is necessary. The project has proposed to re-open approximately 3.3 miles of existing temporary or decommissioned roads and would construct approximately 1.6 miles of new temporary roads. Where feasible, proposed temporary roads would re-trace the alignment of older roads and could be reopened with minimal earth movement. All access areas would be rehabilitated after project completion. Temporary roads would pose an overall low risk of introducing sediment to streams because almost all of these roads would be outside of the Riparian Reserves and away from streams. For prohibited activities, the project does not include any plans to construct new roads or renovate existing non-National Forest System roads and return them to the system. Temporary roads are defined in 36 CFR 212.1:

*Temporary road or trail. A road or trail necessary for emergency operations or authorized by contract, permit, lease, or other written authorization that is not a forest road or trail and that is not included in a forest transportation atlas.*

The Agency does not consider temporary roads to be new road construction since these access routes would not be considered part of the National Forest System roads or included in the Agency’s transportation atlas. Additionally, any impacts from temporary road use are minimized through the use of project design criteria and best management practices and a full effects analysis was completed for all temporary road construction. The hydrologist on the interdisciplinary team found that:

*“Re-opening these roads and the construction of new temporary roads would pose an overall low risk of introducing sediment to streams...” (EA at 142)*

Furthermore, the Omnibus Act explicitly states for the Mt. Hood National Recreation Area that “no new or temporary roads shall be constructed or reconstructed” (Sec. 1204). However, the language is different for the Crystal Springs Unit. Section 1205 of the Omnibus Act prohibits “new road construction or renovation of existing non-System roads, except as necessary to
As stated above, the use of temporary roads, which are not considered National Forest System roads and are not included in the Forest’s transportation atlas, are not a prohibited activity within the Crystal Springs Unit.

An alternative was considered in the EA that would not build any temporary roads in order to avoid impacts to the water quality and aquatic habitat (see EA, Section 1.7.2, Use of Temporary Roads). Not using temporary roads, however, would reduce the proposed action from 2,830 acres to 1,762 acres and would directly limit our ability to treat 60%, nearly two miles, of the NFS/private ownership boundary. This boundary is also designated within the WUI identified in the 2006 Hood River County Community Wildfire Protection Plan.

**Wild, Scenic and Recreational Rivers: East Fork of the Hood River**

East Fork Hood River is a designated Recreational River Area (Public Law 90 542; 16 USC 1271), which flows through the project planning area. The Omnibus Act designated 13.5 miles of the river from State Highway 35 to the Mt. Hood National Forest boundary. The Forest Plan’s goal for this area is to protect and enhance the resource values and outstanding and remarkable values for which a river was designated into the Wild and Scenic River System, to provide opportunities for recreation activities, and to maintain the visual quality of river corridors.

The proposed treatment activities would have no direct effect on the outstandingly remarkable values (lava flow and debris flows) identified for the East Fork Hood River. The geology and hydrology of the river would not be impacted by treatments, and there would be no negative impact to recreational opportunities within the Wild and Scenic River Corridor (see Polallie Cooper EA at 289).

There is no new road, or temporary road construction, designated in areas that are visible from the river or would impact the outstandingly remarkable values for which the river was designated. Any temporary road construction within the Wild and Scenic River Corridor is outside of the view of recreational users along the river or adjacent highway and would be screened by vegetation or topography.

Along the designated scenic portion of Highway 35, all proposed treatment activities have been designed to meet the Forest Plan’s prescribed visual quality objectives. To minimize short-term effects on scenic views, the majority of treatments visible from Highway 35 would utilize helicopters to ensure that corridors and piles would not be visible from the highway. Any units utilizing skyline and ground-based techniques would create narrow corridors perpendicular to the roadway so they would not be visible to viewers from the road. Additionally, trails within the project planning area would be buffered to minimize visual impacts of management activities. Adjacent to trail buffers, a feathering of treatment would be applied to reduce impacts to the viewshed from the trails.

**Wilderness**

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. Therefore, there will be no effect to the Wilderness characteristics of
this area from the proposed action, as outlined in the EA in Section 3.18.2.

The land that Oregon Wild has proposed as their “unfinished business” includes 343 acres of recently unmanaged stand thinning, 22 acres of plantation thinning and 3.4 miles of new temporary road use. Since these lands have not been recommended for Wilderness, as set forth in the recommendation criteria stated in the Forest Service Handbook 1909.12, Chapter 70, there is not a change in the land use designation, and, thus, the lands continue to be managed as directed by the Forest Plan.

In closing, the Interdisciplinary Team of resource specialists and the Hood River District Ranger have worked together with the Hood River County Collaborative Stewardship Group to build a proposal weaving together stakeholder interests and those of our local community. We have received letters of support for this project including, but not limited to the Crystal Springs Water District (referenced above). The employees working on this project are part of the fabric of the local community and have fostered healthy relationships with their community. They work and recreate in the Polallie Cooper project planning area and care for and enjoy the public land entrusted to them on the Mt. Hood National Forest. The intent of the Polallie Cooper project with respect to the Omnibus Act is to be in alignment with this legislation, while at the same time providing for the resilience of this landscape.

Sincerely,

/s/ Lisa A. Northrop

LISA A. NORTHROP
Forest Supervisor

Enclosures