



THE WILDERNESS SOCIETY

**Statement of Robert Freimark, Senior Policy Analyst for
The Wilderness Society**

For the U.S. Senate Public Lands and Forests Subcommittee

Regarding S. 647 (Lewis and Clark Mount Hood Wilderness Act of 2007)

May 2, 2007

On behalf of The Wilderness Society and our 204,000 members, I wish to convey The Society's views regarding S. 647, the Lewis and Clark Mount Hood Wilderness Act of 2007.

The Wilderness Society greatly appreciates the efforts by Senators Ron Wyden and Gordon Smith to develop legislation that preserves an outstanding part of Oregon's wilderness heritage. Oregon is fortunate to have two Senators who work in bipartisan effort to protect such an important part of Oregon's landscape.

The Wilderness Society takes pride in our nation having a network of public lands that can be enjoyed by all Americans. Mount Hood and the Columbia River Gorge are recognized nationally as two of the crown jewels of this public lands network, as well as revered in the Pacific Northwest as regional icons. The National Wilderness Preservation System helps provide the strong safeguards necessary to ensure these special places are protected now and for our great-grandchildren. Congress has previously designated wilderness on Mount Hood, first in 1964 with passage of the Wilderness Act, and again in 1978 through the Endangered American Wilderness Act. Additional areas on the Mount Hood National Forest were protected as wilderness in 1968 with the creation of the Mount Jefferson Wilderness and also in the Oregon Wilderness Act of 1984.

Roaring River, Bull of the Woods, Tilly Jane, Big Bottom, Bonney Butte, Clackamas Canyon, Gorge Ridgeline are names of special places in the hearts of Oregonians and Americans that would receive wilderness designation by S. 647. They all deserve the strongest protection now and for future generations. The Wilderness Society strongly supports the 128,600 acres of wilderness and 81 miles of wild and scenic river designations in S.647. In addition, we believe Boulder Lake and Fifteenmile Creek are two areas that should be upgraded to a wilderness designation from the National Recreation Area designation directed in the legislation.

Based on our initial review of this legislation we have concerns and recommendations about the following provisions of S. 647.

Protecting the North Side of Mount Hood is Essential: Perhaps the greatest threat facing the Mount Hood region is from inappropriate and expansive developments proposed on the north side of the mountain. We support the efforts in the legislation to protect this area through wilderness and a special watershed protection area. We also support the effort to exchange private land at Cooper Spur for land at Government Camp, where development is more appropriate. We support the preservation of trails and wetlands in the 120 acres of Government Camp land as directed by the legislation.

However, The Wilderness Society has concerns about the appraisal portion of the land exchange provision. While the bill appropriately calls for uniform federal appraisal standards, it then alters those standards by fixing the date of valuation to the spring of 2005 and providing potentially interested parties with the shared authority to approve the appraisal.

Under accepted professional appraisal standards, land should always be valued as close to the date of transaction as is feasible. Otherwise, it fails to consider inflating land values. To date, we see no compelling rationale for disregarding this well-established appraisal and valuation principle.

Approval of appraisals for government land exchanges is normally solely at the discretion of the Secretary. We believe that mandating that parties other than the Secretary (here Mount Hood Meadows and the County) must share approval authority with the Secretary is inappropriate. Here, there is a particular concern because the additional parties involved have a potential interest in the outcome of the appraisal. Outside parties should – and do – have the opportunity to provide appraisers with market information relevant to the appraisal. But we believe it is important that appraisal authority for federal lands remain solely within the Secretary’s discretion.

Thus, we recommend that section 503(d)(2)(B) be deleted. We also recommend that section 503(d)(2)(C) be modified to only require the appraisal to be approved by the Secretary (deleting required approval by the County and Mt. Hood Meadows).

BLM Land Reclassification is Unnecessary and Inappropriate: Section 109 requires a process for eventually reclassifying BLM land in Oregon as comparable replacement acreage for a perceived loss of Oregon and California (O&C) Railroad Grant lands in portions of the Clackamas Wilderness designated by S.647. This reclassification is not necessary since wilderness designation does not change the fact that the land is still classified as O&C Railroad Grant lands. Congress has previously designated wilderness within O&C lands but to the best of our knowledge has never reclassified “replacement” O&C land in wilderness legislation (see, for example, the Table Rock Wilderness and the Wild Rogue Wilderness designations). We believe such reclassification is neither necessary nor appropriate in the context of wilderness designation.

We recommend that section 109 be deleted.

Community Support for Fire Safe Zones is Important: Section 106 mandates vegetation management activities around the communities of Cascade Locks and Government Camp. We believe this forest management should be planned in close collaboration with the affected communities. The Forest Service should be directed to work with these communities, and should not be legally obligated to undertake forest management activities without solid local support. We believe this section should also clarify that forest management activities adjacent to Cascade Locks must be consistent with the Columbia River Gorge National Scenic Area Act.

The Wilderness Society commends Senators Smith and Wyden for their public outreach efforts and for advocating for legislation to protect the values that Mount Hood and Mount Hood National Forest provide to Oregonians and all Americans. We are committed to working with both Senators to make the legislation as strong as possible, and to insure swift passage through the Senate.

Thank you for this opportunity to provide The Wilderness Society's views on protecting the special place that is Mount Hood.