

Appendix 3– Response to Scoping Comments

Issue	Public Issue Statement	Response
Planning: National Environmental Policy Act (NEPA) and National Forest Management Act (NFMA)	<p>Our initial review suggests that the project may: 1) exceed the level of activities that could be appropriately documented in a categorical exclusion. We are particularly interested in the use of this CE for an incredible large project, the kind of equipment that will be used in the riparian areas, the removal and reduction of the road network and the agency’s plans for the activity fuels that are left after the project is completed.</p>	<p>The proposed action was analyzed under Category 31.2-6 which states: “Timber stand and/or wildlife habitat improvement activities which do not include the use of herbicides or do not require more than one mile of low standard road construction.” There are no acreage limitations for this category; rather the appropriateness for using this CE is determined by the presence and analysis of extraordinary circumstances. No extraordinary circumstances were identified by the interdisciplinary team of resource specialists that analyzed this proposal.</p>
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	<p>I have concerns for using a Categorical Exclusion (CE) for thinning almost six thousand acres in a variety of sites in the sensitive, super-important Mt. Hood area.</p>	<p>This project was not analyzed under Category 10, which addresses hazardous fuels reduction.</p>
	<p>This project extends across multiple subwatersheds and covers acreage that is four times the amount of acreage allowed by Category 10 projects (1,000 acres or less of mechanical fuels treatments). The authorization to run heavy equipment to perform mechanical thinning on over 5,000 acres of forest, with 1,000 of those acres designated as Riparian Reserves, is highly likely to encounter extraordinary circumstances (steep slopes, presence of endangered species, cultural resources, wilderness eligible areas, etc.).</p>	<p>The project does not include use of heavy equipment or mechanical thinning. Pre-commercial thinning is traditionally implemented with individual workers walking through a stand with a chainsaw. There is no commercial product removed, and the cut biomass remains on site. Further, implementation would occur from 2008 to 2015. The acres treated any given year have historically ranged from 400 to 700, and the implementation of this proposal is expected to have the same intensity.</p>
	<p>The interpretation of Category 6 as used for riparian restoration is not acceptable.</p>	<p>The primary concerns for aquatic resource from the proposed action are potential increases to water</p>

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	<p>The Forest Service must do more than simply claim that the project is improving wildlife, the Forest Service must cite and provide scientific studies to support its stated purposes.</p>	<p>A Wildlife Biological Evaluation (BE) was prepared for this project, which analyzes a summary of the impacts to wildlife, including beneficial effects. The Wildlife BE contains summary of scientific studies and references.</p>
	<p>The agency must consider and disclose cumulative impacts even when using Categorical Exclusions.</p>	<p>Fisheries, wildlife and botany biological evaluations, and fuels, water quality, heritage, and silviculture specialist reports were completed for this project. All these reports include analysis of the direct, indirect and cumulative effects from the proposed action. All these reports are available in the project record, located at the Hood River Ranger District located in Parkdale, Oregon.</p>
	<p>Include the cumulative impacts of the proposed off-highway vehicle areas in any environmental analysis that will be done around this proposal.</p>	
	<p>The Forest Service must consider the direct, indirect and cumulative effects of all past, present and reasonably foreseeable future projects.</p>	
<p>The authorization to run heavy equipment to perform mechanical thinning on over 5,000 acres of forest, with 1,000 of those acres designated as Riparian Reserves, is highly likely to encounter extraordinary circumstances (steep slopes, presence of endangered species, cultural resources, wilderness eligible areas,</p>	<p>No heavy equipment is being proposed in this project. Precommercial thinning involves an individual with a chainsaw cutting down trees less than 6-inches in diameter at breast height that have poor form, small crowns, small diameter and lesser height when compared to their neighbor tree. Species composition</p>	

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	<p>The use of categorical exclusions specifies that the agency must determine that no extraordinary circumstances exist. (FSH 1909.15-2007-1, 31.2) This proposed project takes liberties with this definition, assuming that logging over 1,000 acres of forest designated as Riparian Reserve is not extraordinary.</p>	<p>Felling a proportion of overstocked trees less than 6-inch in diameter and leaving them lay on the ground is not generally considered “logging”, within or without a Riparian Reserve. An environmental analysis was conducted, but not documented in an Environmental Assessment. The environmental analysis did not reveal any significant effects or extraordinary circumstances. The environmental analysis is documented in the project record and summarized in the Decision Memo.</p>
	<p>Over 1000 acres of riparian reserves are involved. The extent of the riparian reserve, should, in itself, be enough to rule out using a categorical exclusion.</p>	<p>An Aquatic Conservation Strategy objective analysis was completed for this project (see Appendix 4) and the project is found to be consistent with all nine objectives.</p>
	<p>Our initial review suggests that the project may . . . 3) not comply with the National Forest Management Act.</p>	<p>The interdisciplinary team reviewed the applicable Standards and Guidelines of this proposal. The analysis demonstrated that this decision is consistent the Mt. Hood Land and Resource Management Plan (Forest Plan), as amended by the Northwest Forest Plan, as required by the National Forest Management Act. This information is contained in the biological evaluations and specialists reports located in the project record.</p>
<p>Planning</p>	<p>We request that the pre-commercial thinning proposed for Riparian Reserves (the restoration component cited in the proposal) be removed from the 2008 Precommercial Thinning proposal and analyzed as part of the “Restoration EA” process.</p> <p>Separate the components of the proposal that are restoration-based and those that are intended for future silvicultural treatments.</p>	<p>As of today, it is possible that future silvicultural treatments could occur on matrix lands, though many aspects of the thinning also would be restoration-based, such as improving species diversity and encouraging early seral species that may have been more common with normal visits from fire. Late-Successional Reserve and riparian reserves would be treated with an eye toward restoration, but the</p>

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continued		<p>accelerated growth of the trees is a goal on all acres.</p> <p>The proposed action is outside the scope of the “Road Decommissioning for Aquatic Restoration EA” process. The EA focuses on reducing adverse impacts to aquatic habitat caused by unneeded roads.</p>
Proposed Action: Pre-commercial Thinning	The project description does not describe the proposed prescription for thinning these stands. . . . We support variable density thinning which allow young stands to develop into more complex and resilient forests.	Upon review of the literature referenced, the Eastside Silviculturist found that the Carey paper applied to stands that were 80 years old, not 15 to 20 year old stands as proposed for treatment. In addition, the paper applied to stands that were 11 inches dbh and commercially thinned. This proposed treatment is on trees that are 6-inches and less in dbh. Further, insect, disease, gophers and drought on the drier eastside of Mt Hood National Forest are anticipated to contribute to variable density after thinning at this young age.
	The use of variable density thinning with targeted use of “skips” to protect and buffer legacy decadence (snags and down wood larger than 21” dbh at the large end), in addition to the minor tree species retention will move these plantations towards a healthier forest ecosystem.	Gaps and dense patches would develop relatively quickly as root disease spread is accelerated in some areas, and as the gaps seed in with reproduction. Current incipient levels of dwarf mistletoe would be encouraged by increased sunlight and begin to manifest brooms and create misshapen trees. (Bruce Holmson, personal communication). There is innate heterogeneity in most Eastside stands, and they function a bit differently than west cascade stands.
	Pre-commercial thinning provides an excellent opportunity to transform the current plantations homogenous vertical structure into a more diverse vertical structure.	
	Looking to the future, implementing a VDT with “skips” located around legacy features will result in a forest that maintains an element of horizontal complex over the years.	Legacy in these stands is primarily provided by overstory trees left at the time of the regeneration harvest; therefore, they range from about 1 to 15 per acre. Some of these have become snags in the intervening years, and some have fallen over to become downed woody debris. The legacy overstory would continue to die and fall over. Our approach is to

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<p>Proposed Action: Pre-commercial Thinning continued</p>	<p>By using the layout features one finds in a variable density thin, “skips” can be located around legacy CWD and snags which will act as a safeguard for these features in the decades ahead when another thin might be contemplated. Further, the trees left in these skips would act to buffer the local microclimate around the legacy feature – promoting habitat diversity in the monoculture – and these trees would also provide protective cover for the animals using those features.</p>	<p>reduce fuels directly under legacy trees, especially live ones, in order to keep them around as long as possible.</p> <p>At this stage, any room created by pre-commercial thinning around a standing tree would shortly fill in with seedlings unless on a very dry site. By the time a second entry is contemplated, any currently existing downed wood would have decomposed into the soil. As legacy snags and trees fall over randomly in the future, some would have protective microclimates and some would not. Given that many of the overstory trees are about 100-feet tall, it is highly probable that most of that tree would land with an adequate density of young trees around it to create microclimates.</p>
	<p>Nor does such a management approach act in a way that recognizes the importance of any legacy features (snags and large downed wood) that the site may still have.</p>	
<p>Proposed Action: Riparian Thinning</p>	<p>We request that the Forest Service specifically analyze how this project meets the Aquatic Conservation Strategy Objectives at the site-specific scale within the Riparian Reserves.</p>	<p>An Aquatic Conservation Strategy objectives analysis was completed for this project and is contained in Appendix 5 of the Decision memo. In summary, The proposed project would treat vegetation in Riparian Reserves to restore them to a more natural vegetation state. This would improve the natural function of the riparian area and accelerate the development of future potential large woody material adjacent to streams. In addition, thinning would accelerate tree growth rates which would speed up hydrologic recovery of the treated watersheds.</p> <p>If the stands were to be followed by commercial harvest, it would be 50 to 70 years hence. Due to changing societal wants and needs, future harvest cannot be accurately speculated. If future timber</p>
	<p>Our initial review suggests that the project may . . .2) violate the aquatic conservation strategy by entering into riparian areas and</p>	
	<p>Assuming Category 6 was chosen for section b. – "thinning or brush control to improve growth or to reduce fire hazard including the opening of an existing road to a dense timber stand" – we ask that the Forest Service seriously consider if this could truly achieve the Aquatic Conservation Strategy Objectives as stated in the Northwest Forest Plan.</p>	
	<p>However, it is clear that this proposal if followed by continued commercial harvest in these stands throughout the district may pose significant risks to drinking water systems and aquatic life in the Hood River drainage.</p>	

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<p>Proposed Action: Riparian Thinning continued</p>	<p>It is clear that this proposal, followed by continued commercial harvest in these stands throughout the district and will pose risks to water systems in the Hood River drainage and disturb recreation areas.</p>	<p>harvest is determined to be appropriate, a complete environmental analysis would be required. The environmental analysis would contain an assessment of the potential impacts to drinking water systems and aquatic life.</p>
	<p>The “no cut” buffer allowed for riparian areas in the scoping letter are much less than prescribed in the Northwest Forest Land and certainly appears inadequate and illegal to me for not meeting the plans’ standards and guidelines.</p>	<p>The use of old legacy roads is not planned for this project, and there is no expectation of disturbance to recreation areas.</p>
	<p>This proposal may also disturb recovering hydrologic regimes by using old legacy roads, disturbing recreation areas and negatively affecting landscape recovery through the use of extremely small no-cut buffers.</p>	<p>The impacts to riparian areas are analyzed in the Fisheries Biological Evaluation and Water Quality Specialists Report contained in the project record. Neither report found significant impacts to the aquatic organisms, their habitat, or water quality from this project. Also, neither report found that these buffers were inadequate to meet the Northwest Forest Plan for this type of project.</p>
<p>Proposed Action: Fuel Loading</p>	<p>Reducing fine fuel loads in areas with disproportionally high ignition sources (along roads, trails and ridges) will be important as well. Some fine fuel loading will be unavoidable, but targeting those areas with highest ignition risk will dramatically reduce fire risk.</p>	<p>Fuel loading post-thinning would vary for each unit treated. Conditions normally found on these units would be typically 1.6 tons per acre prior to thinning. After proposed thinning would occur units historically would fall into these two ranges: 7.7 tons per acre or 11 tons per acre. All of these ranges are within the Mt. Hood National Forest Management Plan Standards and Guides (FW-033) at least 15 tons per acre of dead and down woody material in the east side vegetation communities and 25 tons per acre in west side communities.</p> <p>As such, the fuel loading usually does not warrant any treatment other than pulling some of the cut trees away from roadsides to reduce the proximity to potential ignition sources. The small diameter of the material left on the ground decomposes fairly rapidly, with the fine fuels (needles and small branches) are</p>
	<p>Based on past field trips with Hood River and Barlow District staff, there is already a high fuel loading on the ground in much of the district, and it is highly likely that the treatment will surpass standards. If so, and a plan to deal with fuel loading is drafted, we request more clarification as to whether mechanical equipment will be used for felling, masticating or removing the trees.</p>	

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	<p>First, the Forest Service should explicitly state how it will measure this fuel loading for the 5,000 acres proposed for treatment.</p>	<p>Fuel loading determination for the proposed precommercial thinning for the 5774 acres would be done using Photo Series for quantifying forest residues in the coastal Douglas – fir - hemlock type USDA Forest Service General Technical Report PNW – 51 1976. The manual provides a fast and easy to use means for quantifying and describing existing and expected residues. To aid in determining of any of the treated units exceeded Standards and Guide (FW-033).</p>
	<p>With regards to this project, we request more information on the plans for dealing with fuel loading and complying with the Northwest Forest Plan, including specifics on where different treatments will be applied, and map(s) that are less than 3 MB so that it can be viewed without access to a powerful computer.</p>	<p>Fuels treatment would potentially occur on any of the treatment units, as identified in the project maps. The methods used are described in the preceding response to comments.</p> <p>Any member of the public may request a hard copy of the maps at larger scales by contacting the point of contact for the project. For this project, please contact Jennie O’Connor at 541-352-6002 x634 or jmoconnor@fs.fed.us.</p>
<p>Roads</p>	<p>The project proposal does not mention if much or any road work will be done in association with the pre-commercial thinning. . . . The NEPA document must clearly state whether any roads are proposed for construction or reconstruction within Riparian Reserves, and which of these if any will require stream crossing(s). Please provide a map of proposed road management associated with this project.</p>	<p>The project does not include any road work.</p>
<p>Recreation (OHVs)</p>	<p>This will increase the potential that any roads that will experience temporary use for pre-commercial thinning will face increased use from OHVs.</p>	<p>No new temporary roads or road construction is proposed as part of this project. The contractors would be using the existing road system that is open</p>

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Recreation (OHVs) continued		to the public, or temporarily using closed Level 1 roads that are open for use for administrative purposes. Previous experience has not demonstrated that the administrative use of roads by contractors has influenced OHV access on the Forest.
	Increased access into the forest is often accompanied by increased OHV use (legal or illegal). The Forest Service must explicitly look at the potential that this kind of restoration project which would open the stand up could open up the same forest for easier access by OHV groups and invasive weed colonization.	Since the trees over 6-inches diameter at breast height would not be impacted by this project, the Forest Service does not expect increased access into the Forest to be problematic. If this is determined to be a risk, contract specifications could easily be included to leave a denser line of trees adjacent to roads near common OHV use areas to discourage access.
	In the coming years, should the OHV areas as proposed progresses, these areas will be heavily advertised within the OHV community and the Forest Service must be prepared for a more rapid growth period and an increased intensity to the consequences of this activity.	OHV use across the Forest is outside the scope of this project. The Off-highway Vehicle (OHV) Travel Management Environmental Impact Statement is analyzing the effects of changing OHV use on the Forest. More information on this project can be found at: http://www.fs.fed.us/r6/mthood/projects/ .
Noxious Weeds	Please be sure your objectives include controlling the spread of invasive weeds and reducing the populations to these weeds, which serve as seed sources in disturbed areas.	A noxious weed risk assessment was prepared for this project and included as Appendix 5. There is a moderate risk for spreading or introducing noxious weeds due to the presence of known noxious weed sites, project operations are not able to avoid all noxious weed sites, and the potential to spread noxious weeds through the movement of people and vehicles. To minimize the potential spread of noxious weeds, project design features/mitigation measures and standard contract specifications regarding noxious weeds are included.