

Appendix A - Response to Comments Upper Clack Thin

The proposed action along with a preliminary assessment (which in addition to proposed action included the need for the proposal, the alternatives considered, and the environmental consequences) was made available for public comment, (36 CFR 215, 5/13/03). Letters and e-mails were received during the 30-day comment period, which ended on May 15, 2008.

The responsible official has considered comments received and has developed the Upper Clack Thin Environmental Assessment in response to those comments.

This appendix responds to the substantive comments. Substantive comments are comments that are within the scope of the proposed action, are specific to the proposed action, have a direct relationship to the proposed action and include supporting reasons for the Responsible Official to consider (36 CFR 215.2).

The emails and letters are in the analysis file; the following is a summary. In the responses, section numbers refer to the Environmental Assessment unless otherwise specified.

	Comment	Response
Clackamas Stewardship Partners	1. After collaborating with the Clackamas River Ranger District over the past year on the Upper Clack Thinning Project, the Clackamas Stewardship Partners (CSP) is pleased to support the adoption of Proposed Action (Alternative B). The overall focus of this alternative (namely, the management of second-growth plantations to increase biotic diversity, to speed the development of late-successional forests, to enhance riparian reserves, and to provide forest products to stimulate the local economy) supports CSP's vision of enhancing ecosystem health and economic viability of communities in the Clackamas River Watershed.	
Oregon Wild	2. It is unclear if the FS will provide public notice and comment on the draft EA. By preparing such a detailed 124 page "preliminary assessment", the FS is wasting effort that should go into the draft EA.	A scoping process to request public input for this project was initiated November 13, 2007. The Forest Service began a process of collaboration with the Clackamas Stewardship Partners of which Oregon Wild is a member in the summer of 2007 with

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		several meetings and field trips. The preliminary assessment was available for a 30-day comment period that ended on May 15, 2008, (s. 2.4). A detailed ‘preliminary assessment’ was prepared to afford the public the opportunity to review essentially all of the information that is contained in the EA.
Oregon Wild	3. The PA repeatedly refers to outdated standards & guidelines from the LRMP that should be reconsidered before being applied to current restoration projects. Such as the FW standard that requires “vigorous” stands throughout the forest. The snag and down wood standards based on biological potentials are also outdated and the Forest Service needs to prepare new programmatic EIS to consider and adopt new standards. The DecAID advisor is a useful start, but it is NOT a management standard because it just provides information, it does not prescribe any particular tolerance level for any particular land allocation.	The Mt. Hood Forest Plan as amended is our current management direction (s. 2.2.6). A revision of the Mt. Hood National Forest Land and Resource Management Plan is scheduled for the future.
Oregon Wild	4. Section 3.2.2 discusses the fact that LSRA goals for down wood would not be met because it would require leaving too many trees in the forest instead of being sent to the mill. This is a problem. Down wood is an important feature of late successional habitat including important functions for Threatened spotted owls and their prey. Economic motivations are not supposed to dominate in the reserves. The FS should figure out ways of mitigating this loss by retain larger skips on 15-40% of each unit where the LSRA down wood goals are met within 5-20 years. The FS needs to more fairly disclose the trade-offs between accelerating large trees vs. recruiting dead and down wood.	Economic motivations are not the primary driver for thinning in LSRs. The only way to finance important plantation restorations in the LSR is to use the value of the timber removed to accomplish restoration thinning. The adjustments suggested would result in unviable projects and the units would have to be deleted from the thinning timber sale, defeating the equally important long-term goal of having large live trees in LSRs (s. 3.2.2, s. 4.4.4). The Regional Ecosystem Office LSR working group has reviewed the proposal and agreed that it provides the best mix of benefits to spotted owls and LSRs, (s. 2.2.10). The proposed action was developed in collaboration with the Clackamas Stewardship Partners (CSP) of which Oregon Wild is a member. The CSP has supported this project including the LSR thinning strategy (s. 2.3).
Oregon Wild	5. We are not opposed to thinning in riparian reserves but we want the trade-offs to be accurately disclosed and appropriately considered.	The impacts and benefits of thinning in riparian reserves are discussed in s. 3.7 and s. 4.1.4.
Oregon	6. The PA fails to acknowledge that logging and processing	The analysis does acknowledge that greenhouse gasses would be

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Wild	wood products releases large amounts of greenhouse gases and that wood products tend to be short-lived compared to trees in the forest.	released (s. 4.15). While no attempt was made to quantify carbon emission or sequestration, the latest science on the subject indicates that thinning plantations would likely be beneficial. Variable density thinning would enhance the health of the residual stand and would result in trees that are better able to withstand stresses such as dry summer conditions. Stands would be more resilient and better able to respond to whatever changes come in the future (s. 4.15).
Ferranti	7. Thinning will create unnaturally healthy stands and will further aggravate the dearth of snags/decadence and CWD bringing these areas well outside the range of natural variability. Thinning will “capture” the mortality and these Reserves will have significantly reduced incidence of, and effects from, decadence for many decades following the thinning. Consequently, the current plan outlined in the Upper Clack Thin will significantly retard the attainment of late-seral characteristics within the Reserves.	The analysis found that late-successional characteristics would be achieved sooner with thinning, (s. 4.1.3.2). The Regional Ecosystem Office LSR working group reviewed this project and agreed that the proposed action was better for LSR development than no action or creating the levels of snags and down wood discussed in the LSR assessment, (s. 4.4.4).
Ferranti	8. Where the RR and LSR land designations overlap, the RR would not take the more conservative LSR practice of leaving large trees but would instead follow the Matrix practice of removing the large trees rather than leaving them as CWD. Trees over 24” within LSR and RR should not be cut and when they do need to be cut they should be left on the forest floor as CWD.	Trees over 24” diameter would be retained where riparian reserves and LSRs overlap if there are any, (s. 2.3.5). The plantations contain trees that average 13” diameter (s. 4.1.2.1).
Ferranti	9. Effective management of decadence in the forest has been demonstrated to not be a simple matter of mechanical snag creation as currently planned. “In the LSR units, three to seven trees per acre would be girdled...” (p. 19). Active management of Reserves needs to include fungal infection since these pathogens act to create structural differentiation over time.	The quote from page 19 is from s. 2.3.9.3 that describes coarse woody debris creation. Snags would be created as described in s. 2.3.9.2 using techniques such as tree topping and fungus inoculation.

Oregon Wild

Oregon Wild attached 33 pages of supplemental information that is general in nature and does not seem to contain any comments that are not already addressed above or in the environmental analysis.

Oregon Wild also listed general recommendations for restoration thinning prescriptions. The topics listed that are not already addressed above were considered in the development of the environmental analysis. Oregon Wild was part of the collaboration on this project and is part of the CSP that wrote in support of the proposal.