

## Tongass Plan Monitoring Program Administrative Changes Response to Comments

To comply with the monitoring requirements in the 2012 Planning Rule (36 CFR 219.12), administrative changes to the Tongass Plan Monitoring Program were necessary. Administrative changes require notice to the public. Notice was given to the public on March 9, 2016 of the intended changes and given a 30-day public comment period which ended on April 8, 2016. Seven external comment letters were received on the proposed changes as well some internal comments from resource specialists. I considered the comments received before finalizing the administrative changes that take effect on May 9, 2016; the final monitoring plan is posted at <http://www.fs.usda.gov/goto/R10/Tongass/Monitoring>. This document provides an overview of the comments received and a brief response to those.

A previous comment period was held in early 2015 at the same time scoping comments were being requested on the Tongass Forest Plan Amendment. One comment letter was received at that time. No changes were adopted in 2015 and the previous monitoring program (Chapter 6 of the 2008 Forest Plan) remained in effect. Several internal revisions were made to the Draft Plan Monitoring Program (monitoring plan) in the last year and therefore triggered the March 9 – April 8, 2016 public notice and comment.

*Table 1: Response to Comments*

Comment	Response
<p>One commenter felt that logging is damaging the coastal rainforest and should only be done on tree farms, especially in addition to environmental crises from global warming</p>	<p>The monitoring program is not the place to determine when, where, or if logging will be done; those decisions are made through National Environmental Policy Act (NEPA) decisions, including at the Forest Plan and project levels. The monitoring program evaluates the existing Forest Plan implementation and effectiveness, including the use of standards and guidelines designed to reduce negative effects of resource management activities.</p> <p>No changes were made to the Monitoring Program as a result of this comment.</p>

Comment	Response
<p>One commenter was against the proposed Forest Plan Amendment and requested that the Draft Environmental Impact Statement (DEIS) for that project be rescinded</p>	<p>The proposed Forest Plan Amendment is a separate process from the administrative changes to the monitoring program. The Forest Plan Amendment is currently ongoing and has its own NEPA process. That process included a formal scoping period before the DEIS and a recent comment period on the draft Forest Plan and associated DEIS; both of these timeframes included a series of public open houses throughout Southeast Alaska. A website is also maintained with information on that process.</p> <p>The administrative changes to the monitoring program that this comment period pertains to will evaluate the existing 2008 Forest Plan and is separate from the proposed amendment. Any future administrative changes needed to bring the monitoring program into alignment with the amended Forest Plan will have an additional comment period.</p> <p>No changes were made to the Monitoring Program as a result of this comment. The comment was forwarded to the Forest Pan Amendment team.</p>
<p>One comment requested an update to reflect a change in which State agency has regulatory authority for log transfer facilities and storm water discharge permitting</p>	<p>Thank you. The relevant objective associated with the Transportation Systems monitoring questions (Questions 28 and 29) has been corrected to reflect Alaska Department of Environmental Conservation (ADEC) as having regulatory authority for storm water discharge permits.</p>

Comment	Response
<p>A comment recommended adding at least one monitoring question to address young growth treatment and wildlife, species response, including focal species. This comment also included a recommendation to continue field validation on the Forest Resource Evaluation System for Habitat (FRESH) model as a data source for this question.</p>	<p>At this time, Questions 3 and 4 do look at some aspects of young growth treatment results, including use of the Tongass-Wide Young Growth Study (TWYGS) data. A monitoring question specifically focusing on young growth treatment effects on focal species can be considered in the future, once focal species are identified and a decision has been made on the ongoing Forest Plan Amendment. Funding for the FRESH work is considered with other monitoring project proposals and other wildlife projects annually. At this time there is a contract in place to work on finishing the model.</p> <p>No changes were made to the Monitoring Program as a result of this comment.</p>
<p>One comment encouraged the Forest Service to continue to develop a Wolf Habitat Management Program and recommended the wolf be included in Questions 14 and 15.</p>	<p>The Forest Service participates in an interagency Wolf Technical Committee. The wolf is included in Question 14.</p> <p>No changes were made to the Monitoring Program as a result of this comment.</p>
<p>A recommendation to have a rotating sampling schedule for wildlife monitoring (Questions 14 and 15), with focal species and species of conservation concern (SCC) monitored annually and other species at various frequencies appropriate to detect population and habitat changes. Included in this comment was a recommendation to have sufficient feedback mechanisms to allow concerns to be addressed if they arise outside the usual 2-year reporting cycle.</p>	<p>The monitoring schedule for focal species and SCC will be determined once those species are determined and a question(s) is added to address those species. For the current monitoring plan, clarification was added to the "Sampling / Reporting Period" column for Questions 14 and 15 to reflect that all species may not be monitored every year. At this time, no changes were made to the feedback listed for these questions; this change could be considered in the future or possibly as an normal operational / administrative process outside the monitoring program.</p>
<p>One comment recommended that Transportation Question 28 be expanded to ask if standards and guidelines for roads and log transfer facilities limit environmental effects and human use effects on wildlife. This also asked to include Access and Travel Management Plans as a data source.</p>	<p>Question 14 references the wolf road density standard and guideline (WILD 1. XIV A.1) as an indicator; this is similar to what was requested. If an additional question or monitoring indicators are needed, future administrative changes may be considered. The Access and Travel Management Plans were added as a data source to Question 28.</p>

Comment	Response
<p>One comment recommended deferring the Monitoring Program changes until release of the Forest Plan Amendment. If the agency moves ahead with changes at this time, the comment suggests leaving the description under the heading “Deferred and Future Actions” in the document and allowing for a future public comment period when such deferred actions are undertaken.</p>	<p>Forest Service Handbook 1909.12 Chapter 30, Section 32.3 states that the monitoring program must meet the requirements of 36 CFR 219.12 by My 9, 2016, or as soon as practicable. This direction also states that if a Forest Plan is undergoing revision this requirement may be deferred until the plan revision is completed and that forests which have not initiated a plan revision must complete the monitoring program transition. Since the Tongass is amending the Forest Plan instead of revising, the transition is to be complete by May 9, 2016.</p> <p>No changes were made to the Monitoring Program as a result of this comment. Future substantive administrative changes to the Tongass Monitoring Program will have public notice and comment as required in 36 CFR 219.13 (c)(1).</p>
<p>One comment encouraged continued and enhanced coordination and collaboration with other entities and requested the “Roles and Responsibilities” section be strengthened with specific references and examples. It also felt that such efforts could be added to the indicators, data sources, and feedback mechanisms associated with particular monitoring questions. The comment wanted the Monitoring Program to clearly state that National Forest management and control does not extend to other ownerships.</p>	<p>The monitoring program needs to remain flexible enough to respond to new information and emerging issues in the future. Since partnerships continually evolve, specifics were not added. However, the following statements were added:</p> <p>Under the “Roles and Responsibilities” section: “Use of relevant data from a collaborative group or from individual agencies, partners, and volunteers would benefit Tongass National Forest monitoring as well as other land owners in Southeast Alaska.”</p> <p>Under “Relationship to Other Information Needs and Monitoring Activities” section of the monitoring plan: “The activities described in this document refer to monitoring and evaluation of National Forest System lands and do not include any such activities on adjacent non-NFS lands; similar actions may be undertaken by individuals or agencies with the proper authority and jurisdiction for those lands.”</p>

Comment	Response
<p>One comment ask to consider consolidating, shortening, or simplifying the questions to reduce the number and complexity of monitoring elements in order to increase the likelihood of successful and sustainable monitoring. Similar to this was a request to consider rearranging the order of the monitoring questions to be alphabetical. Also suggested was to clarify and broaden feedback mechanism statements.</p>	<p>We agree that the monitoring program as written includes a large number of questions and has an opportunity to simplify. Due to the requirement to complete transition to the 2012 Planning Rule requirements by May 9, 2016, and the priority to complete the Forest Plan Amendment, the Tongass kept much of the previous (2008) monitoring program as. Future administrative changes to the monitoring program will likely consider reducing the number of questions because the 2012 Planning Rule states that</p> <p>“Subject to the requirements of paragraph(a)(5) of this section, the responsible official has the discretion to set the scope and scale of the plan monitoring program, after considering: (i) information needs identified through the planning process as most critical for informed management of resources on the plan area; and (ii) the financial and technical capabilities of the Agency.” (36 CFR 219.12 (a)(4))</p> <p>Some questions were combined or reworded as part of the proposed administrative changes presented in the Draft Plan Monitoring Program that was released for public comment. By delaying further consolidation of questions, the Forest will have time to set an appropriate scope and scale for the monitoring program and consider the priorities(critical needs) and anticipated financial capabilities.</p> <p>No changes were made to the Monitoring Program as a result of this comment.</p>
<p>A few editorial comments were received</p>	<p>Thank you. Numerous corrections were made, including correcting inconsistent page footers, correcting terminology related to Alaska Native Corporation and tribal officials, clarifying wording, and correcting table headers.</p>

Comment	Response
<p>A request was received to include a statement in the introduction and on the website to show deferred actions</p>	<p>The “Introduction” section now includes a reference to the “Deferred and Future Actions” section. The Tongass’ monitoring and evaluation website will be updated in the near future to include the adopted administrative changes, the response to comments (this document), and a statement disclosing the deferred actions.</p>
<p>A request to include the definition of “productivity of the land” was received.</p>	<p>This phrase is defined in the 2012 Planning Rule; a hyperlink to 36 CFR 219 (Planning Rule) has been inserted in the final document for those who wish to obtain further information.</p>
<p>One comment wished to see more concrete information on the processes used for monitoring (“how” certain things will be accomplished).</p>	<p>The Monitoring Program needs to be flexible enough to respond to new information and emerging issues in the future. The protocols used for monitoring are updated as needed; this document lists possible indicators and data sources for monitoring but does not describe in detail how the monitoring is to occur.</p> <p>No changes were made to the Monitoring Program as a result of this comment.</p>
<p>Information on policies and directives as well as on the PNW research station was requested.</p>	<p>For efficiency, Forest Service documents try to limit repeating direction contained elsewhere. Hyperlinks to our directives, the Regional Office, the Tongass National Forest, and the Pacific Northwest Research Station were added.</p>
<p>A comment wanted to see information on road condition monitoring, particularly culverts and sedimentation, and progress on deferred maintenance.</p>	<p>Data sources for Questions 19-21 (Soil and Water) includes “field collected data” and “Best Management Practices (BMP) soil and water monitoring.” These questions look at soil erosion and water quality. Fish passage (for example, “red culverts”) is analyzed as part of Question 12 (Streams – Fish Habitat).</p> <p>Watershed analysis has been added as a potential data source for Questions 19-21.</p>

Comment	Response
<p>One comment asked for additional indicators in the Climate section to address effects on focal species and species of conservation concern, and cross-references to Invasive Species and Insects and Disease sections.</p>	<p>Focal species and species of conservation concern have not been identified for the Tongass; questions related to these are deferred until such time as the Regional Forester designates these species.</p> <p>The cross-reference was added.</p>
<p>A request to add indicators to Biodiversity Questions 3 and 4, including slash effects and canopy structure.</p>	<p>The questions refer to key habitat components and improved habitat; if treatments being monitored are found to reduce habitat conditions instead of improve habitat, that determination would be discussed in the relevant monitoring and evaluation report. The Tongass-Wide Young Growth Study is referenced as a data source for these questions; various young growth treatments are being studied as part of that effort and are planned to continue to obtain long-term data on these sites.</p> <p>No changes were made to the Monitoring Program as a result of this comment.</p>

Comment	Response
<p>Questions 5, 6, and 7 (old growth): Comments felt that the questions fell short on species-specific information, monitoring indicators, and the scale used to analyze the data. Another thought Question 5 should be asking if the reserves are sufficient in supporting populations rather than asking if the reserves are being maintained, and that Question 7 should compare matrix and non-matrix lands to determine if the remaining old growth in the matrix is “representative.”</p>	<p>These questions work together to monitor changes to the conservation strategy. Question 5 is intended to monitor the Old-Growth Reserves while Question 7 is intended to monitor implementation of standards and guidelines that leave old-growth within the matrix (development LUDs). Question 6 looks more at changes to components of old-growth such as high volume strata. Species-specific effects are monitored in other questions (for example, Questions 14 and 15); these questions are used to look at old-growth habitat.</p> <p>Connectivity, deer habitat capability, and patch size (examples used in the comment) are typically analyzed at the project-level to determine possible site specific effects. Within the monitoring and evaluation report, such project-level analyses are often used as a data source for any changes that have occurred. The resource specialist can discuss effects to habitat at various scales. For example, the evaluation may report annual timber harvest by WAA – typical scale analyzed for deer habitat capability in relation to wolves - but report legacy standard retention by VCU since cumulative harvest at that scale “triggers” implementation of that standard.</p> <p>The Monitoring Program is based on the Forest Plan which uses the conservation strategy (a system of large, medium, and small reserves with additional standards and guidelines to follow within the matrix – development lands). A complete review of the effectiveness of the current conservation strategy approach would be a topic for the next Forest Plan Revision.</p> <p>No changes were made to the Monitoring Program as a result of this comment.</p>

Comment	Response
<p>Comments requested Question 14 include additional species or data sources that better show population effects associated with management activities.</p>	<p>Queen Charlotte goshawk is a sensitive species and therefore is included in Question 17. Endemic species are included in Question 15. Question 14 was based on draft recommendations from a 2011 interagency review of Management Indicator Species; black bears are currently included. Inclusion of cavity nesting birds and bats could be considered in the future during the process to determine focal species and species of conservation concern.</p> <p>One example given for additional data is the wolf-focused ADF&amp;G research on Prince of Wales Island. The Forest Service participates in an interagency Wolf Technical Committee that is looking at this topic, outside the monitoring program at this time but recommendations from that committee could be incorporated into monitoring reports when they are available. Another example was use of the ALMS surveys for land birds; we are working with USGS on survey design to improve the use of this protocol in a managed stand compared to a nearby natural stand.</p> <p>No changes were made to the Monitoring Program as a result of this comment.</p>

Comment	Response
<p>Species composition changes or a particular species or habitat for certain islands should have been included.</p>	<p>One example used in the comment included changes in deer, wolf, black bear, and marten on Kuiu Island. All of these species are included in Question 14. The resource specialist can note relevant changes / interactions while evaluating those species. Other examples include deer winter habitat on NE Chichagof, Kupreanof, and Mitkof Islands. This is a Forest-wide monitoring program; it does not include all monitoring and research occurring across the Forest (see “Relationship to Other Information Needs and Monitoring Activities” section of the Monitoring Program document). In addition, project analysis would be looking at interactions at a smaller scale such as island or biogeographic province.</p> <p>Another example is stabilizing and recovering of the GMU2 wolf population. An interagency Wolf Technical Committee is reviewing this situation, outside of the monitoring program.</p> <p>No changes were made to the Monitoring Program as a result of this comment.</p>
<p>A question about actions taken that may restrict subsistence was requested.</p>	<p>An indicator was added to Question 16 (Subsistence) regarding the number of projects determined to have a significant possibility of a significant restriction on subsistence.</p>

Comment	Response
<p>A comment that the scale of analysis for Question 11 (fish) does not show impacts and that Questions 12 and 13 (aquatic habitat and riparian vegetation) are not being answered except for focused restoration projects.</p>	<p>Question 11 looks at population trends for dolly varden char, cutthroat trout, and coho salmon; this analysis is completed by an experienced fish biologist who evaluates survey data and determines the scale / context of the analysis.</p> <p>Questions 12 and 13 are being evaluated for purposes other than restoration projects. Question 12 uses data from reference (natural) streams as the baseline for which to compare streams near management activities; additional reference streams have been recently added to have a more complete dataset. This question also looks at fish passage at road crossings. Question 13 evaluates windthrow within riparian management areas shortly after harvest and then again in subsequent years to determine effectiveness of the buffers.</p> <p>No changes were made to the Monitoring Program as a result of this comment.</p>
<p>Special attention should be given to monitoring BMPs for logging roads</p>	<p>Much monitoring occurs in relation to BMPs. Question 12 looks at fish passage, Questions 19-21 look at soil productivity and water quality standards, Question 22 at wetlands, and Questions 28 – 29 at roads and trails.</p> <p>No changes were made to the Monitoring Program as a result of this comment.</p>
<p>Request to add a question that looks at actions affecting rare plants.</p>	<p>Question 18 monitors rare plants and is similar to what the comment requests. It includes an indicator about mitigation measures that were implemented and number of populations found; the data sources include a review of NEPA documents where mitigation measures were requested.</p> <p>No changes were made to the Monitoring Program as a result of this comment.</p>

Comment	Response
<p>Need to identify “critical thresholds”</p>	<p>Most of the monitoring questions evaluate against standards and guidelines in the Forest Plan and/or research. This information is included in the monitoring and evaluation reports. The resource specialist who writes the report also includes a “recommendations” section in which they can identify information gaps or recommend changes to the responsible official.</p> <p>No changes were made to the Monitoring Program as a result of this comment.</p>
<p>One letter contained a list of suggested species for use as focal species and species of conservation concern, and encouraged scientific and public input when the list is developed.</p>	<p>As stated in the Monitoring Program, developing questions for focal species and species of conservation concern is being deferred until the Regional Forester designates these species. The suggested list and suggested sources for other species that may warrant being considered for the list is appreciated.</p> <p>No changes were made to the Monitoring Program as a result of this comment.</p>

Comment	Response
<p>A suggestion to monitor the Forest Service “footprint” in relation to climate change and use of additional indicators such as temperature/precipitation/air composition/snowpack/stream flow/stream temperature</p>	<p>We agree that the monitoring program as written includes a large number of questions and has an opportunity to simplify and better define indicators and feedback mechanisms for some of the questions. The responsible official has the discretion to set the scope and scale of the plan monitoring program after considering information needs and the financial and technical capabilities of the Agency (36 CFR 219.12 (a)(4)).</p> <p>Future administrative changes to the monitoring program will likely look at the climate change question as one of opportunities to clarify and better define the monitoring needs. At this time, the indicator to use Forest Inventory Analysis (FIA) data will remain for this question. Tree species composition is likely to shift as a result of changing climate and the FIA program is likely to last long enough to observe changes that may occur.</p> <p>Monitoring the Forest Service carbon footprint would be better suited to a broad-scale monitoring program for the Region rather than each individual Forest; this broad-scale monitoring strategy is not yet complete for the Alaska Region. In addition, a “climate scorecard” is used nationally (each National Forest completes it), outside the monitoring program, to create a balanced approach to climate change in four dimensions – organizational capacity, engagement, adaptation, and mitigation (<a href="http://www.fs.fed.us/climatechange/advisor/scorecard.html">http://www.fs.fed.us/climatechange/advisor/scorecard.html</a>).</p> <p>No changes were made to the Monitoring Program as a result of this comment.</p>
<p>Comments were received to modify language in Question 35 (Heritage) to better align it with Forest Plan standards and guidelines and current terminology.</p>	<p>The sub-questions were reworded as requested, along with changing the title to “Heritage Program” from “Heritage Resources” and “heritage resources” to “cultural resources” in the goals/objectives.</p>