

Response to Comments
Forest Plan Monitoring Program
May 2016

The 2012 Planning Rule (36 CFR 219) requires the Mt. Hood National Forest to establish a land management plan monitoring program by May 9, 2016, or as soon as practicable, that is consistent with the new Planning Rule’s monitoring requirements. The Forest proposed modifications to the existing Mt. Hood Land and Resource Management Plan monitoring program (found on pages 5-1 to 5-75) to conform to the new monitoring requirements. In the summer of 2015, the Forest invited public comments on a proposed Forest Plan monitoring program. Two letters were received: 1) Freres Lumber; and 2) Bark. The table below is the Forest’s responses to these comments.

Commenter	Comment	Forest Service Response
Freres	<p>I refute that deer and elk populations and habitat are improving. “Hunting licenses for deer and elk are now at 1952 and 1972 levels as a result of your failed forest plan.” Freres states that the proposed Forest Plan monitoring program “does nothing to improve their condition or future.” This is a result of “failure to regen harvest timber for the past 20 years.”</p> <p>Freres’ comment is regarding proposed monitoring question iii.d.</p>	<p>In the letter dated July 6, 2015, the table stating that deer and elk numbers and habitat conditions are improving is taken directly from the Forest Plan on page Two-9. This description was based on data from 1990, which is the date of publication of the Forest Plan, and is not a statement of current conditions. Early seral habitat created by regeneration harvest has been in decline, as was predicted by the Northwest Forest Plan (1994 FEIS p. 3&4-203). The Forest has proposed to continue to monitor deer and elk, as they are good indicators of early seral habitat. Specifically, we plan to monitor the acres of early seral habitat needed for deer and elk persistence (see <u>Monitoring Question iii.d</u>).</p>
Freres	<p>Freres asserts that the Forest is “a gross underperformer regarding timber harvesting and overall land management.” Freres believes that “timber production should be increased at least 5 fold to bring matrix land up to one half of the Mt. Hood land base.” The Forest has emphasized thinning young stands; however, Freres states that there is a need for “older, higher quality, higher volume per acre timber removal.” Freres believes that the harvest level on the Forest is “overstated by 25%” because of the eastside scribner scaling method.</p> <p>Freres’ comment is regarding proposed monitoring questions vii.b-d.</p>	<p>As directed by the Forest Service’s Pacific Northwest Regional Office, the Forest has annually met its timber obligations. While we appreciate Freres’ perspective to increase timber production, this is outside the scope of the Forest Plan monitoring program. Although increased timber production is outside the scope of this effort, the Forest understands the need to monitor this element of land management and, therefore, has proposed to monitor changes in the land base available for producing timber as well as the amount of timber being awarded (see <u>Monitoring Questions vii.c and d</u>).</p>

Commenter	Comment	Forest Service Response
Bark	<p>Since there are no northern spotted owl study areas on the Forest, Bark believes that the proposal to remove the owl from the list of focal species may lead to no monitoring of populations on the Forest. Bark states, “Given that most of the NSO populations are in decline, shouldn’t MHNF do a population survey of NSO on the Forest, or at the very least, in designated Critical Habitat?” Bark asserts that this change in the Forest Plan monitoring program is a “regression” from the current Forest Plan’s monitoring questions.</p> <p>Bark states that the Forest should complete an assessment of northern spotted owl populations across the Forest, compare it to historic numbers, and assess whether the species is stable or in decline.</p> <p>Bark’s comment is regarding proposed monitoring questions iv.b.</p>	<p>Although the Forest has proposed to remove the spotted owl from the focal species list, it is still an Endangered Species Act-listed species and therefore will continue to be monitored as such. More specifically, the Forest will monitor the trend for mature and late successional habitat needed for owl’s persistence (see Monitoring Question iv.b).</p> <p>Since owl population is monitored at the range-wide level, the Forest is not proposing to monitor the population. Thus, the monitoring question about northern spotted owl population included in the “draft” Forest Plan monitoring program dated June 2015 has now been removed. Further, a “population” survey would require years of survey data and banding of individual owls. Since the Forest has not had a historic study, there would be nothing to compare a new one too in order to determine a stable or declining population. The species has been extensively assessed in Demographic Study Areas located across the entire range of the species, which has clearly indicated that the species continues to decline range-wide. Assumptions were made that the data from this study could be applied to the entire range, including the Mt. Hood population. Also, the Forest surveys all project areas that propose to treat within or remove suitable habitat so we can avoid core areas and place treatments and habitat corridors accordingly.</p>
Bark	<p>Bark asks the question, “How does monitoring salmonids duplicate the efforts of the ACS?” They also ask the following: “What are the reporting requirements to the regulatory agencies? How often does post-project monitoring actually happen as prescribed in the consultation letters? Will there be aggressive monitoring of salmonid populations by the MHNF under the proposed Plan?”</p> <p>Bark’s comment is regarding proposed monitoring question ii.a.</p>	<p>The ACS objectives are best achieved through planning, project design criteria, and implementation. To evaluate effectiveness of ACS implementation, one type of effectiveness monitoring is to evaluate whether the stream/riparian habitat is functioning in a way that supports the appropriate distribution of fish species on the Forest. Reporting requirements that originate from a Biological Opinion issued to the Forest Service from one of the regulatory agencies is project specific, but the information reported can/is used to document effects that may impact riparian function or riparian dependent species. If post-project monitoring is prescribed in consultation letters, the monitoring is completed to fulfill agency obligations under the ESA. The stream inventory program produces data that is entered into cooperate data systems to document physical habitat attributes and aquatic biota. This information is combined with other agency data (usually ODFW) to obtain more complete fish population data.</p>

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Bark	<p>Bark would like more explicit information about the change to the Forest Plan’s Appendix H. They state, “The rationale MHNH gives is that removing the reference to Appendix H ‘allows the Forest to utilize the current management direction on BMPs provided in 2012 as well as to use any updates that may happen prior to the completion of Forest Plan revision.’ The rationale excludes any specific reference to the 2012 Planning Rule – making it very difficult to know what is replacing Appendix H.”</p> <p>Bark’s comment is regarding proposed monitoring question i.a.</p>	<p>Only the <i>reference</i> to Appendix H in the text of the Forest Plan Standards and Guidelines FW-055 and FW-056 is intended to be removed because it cites an out dated Regional FEIS and BMP Program that has been replaced by a National BMP Program. Appendix H itself is not being proposed for removal. However, the intent is to replace the outdated 1988 Regional BMP Program with the 2012 National BMP Program. Language in Forest Plan Standards and Guidelines FW-057 and FW-058 will also be administratively changed to strike the reference to the 1988 Regional BMP Program in order to adhere to the most recent guidance regarding BMPs. The Forest Plan Standards and Guidelines referred to in Monitoring Question i.a have been revised to only include FW-055 to FW-058 since these Standards and Guidelines direct the Forest to conduct BMP monitoring, which is now performed using protocols outlined in the 2012 National BMP Program.</p>
Bark	<p>Bark believes that the proposed monitoring program lacks the basic components of the Forest Plan. They state, “why does the Mt. Hood National Forest’s proposed Monitoring Plan have so little substance, compared to both its existing plan, and other similarly situated National Forests that are also updating their Monitoring Plans based on the 2012 NFMA Regulations?”</p>	<p>The 2012 Planning Rule requires that each Forest Plan monitoring program must contain one or more monitoring questions and associated indicators as outlined in 36 CFR Part 219.12(5). Therefore, the proposed Forest Plan monitoring program meets the requirements stated in the 2012 Planning Rule. Further, the 2012 Planning Rule provides discretion for the Responsible Official to set the scope and scale of the Forest Plan monitoring program (36 CFR Part 219.12(4)). That being said, we anticipate the biennial monitoring report to include most of the information that Bark is requesting, such as, methodology, unit of measure, and thresholds. Also, we expect that each monitoring question included in the monitoring report will discuss relevant changes and/or progress toward achieving or maintaining the Forest Plan’s desired conditions.</p>

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Bark	<p>Bark asserts that the standards in the Forest Plan and Northwest Forest Plan are “more specific and restrictive” than the general non-point source provisions of the Clean Water Act. They believe that “the proposed monitoring question, have BMPs been implemented and are they effective at managing water quality <i>consistent with the CWA</i>, does not actually provide the information necessary to tell if the projects are complying with the underlying substantive guidelines of the NFP and LRMP.”</p> <p>Bark’s comment is regarding proposed monitoring question i.a.</p>	<p>Monitoring Question i.a is intended to link to the ACS General Objectives of monitoring, specifically objective (1) on page B-32, paragraph 3 of the Northwest Forest Plan Record of Decision and Standards and Guidelines. Additional text has been added to the Forest Plan Component for Monitoring Question i.a so that it reads: “NWFP Standards and Guidelines: Aquatic Conservation Strategy, General Monitoring Objective (1).” The goal is to use the results of the annual monitoring of BMPs to evaluate those that were prescribed as a means to achieve specified ACS objectives at a site-specific scale.</p>
Bark	<p>Bark states that the monitoring question proposed, “Are the Standards and Guidelines effective in maintaining or enhancing fish habitat capability?” leads to the following questions:</p> <ul style="list-style-type: none"> - Which Standards and Guidelines is the Monitoring Question referring to? - How is this habitat improvement tracked? - Does “occupy” mean one fish? A few fish? A healthy population of fish? - How is this tracked? By stream population surveys annually to see if the number of fish is increasing or decreasing? - What if factors unrelated to habitat and fish passage, such as water temperature, are the primary limitations of fish population? <p>Bark’s comment is regarding proposed monitoring question ii.a.</p>	<p>There are many Standards and Guidelines applicable to aquatic resources in the Forest Plan that relate to riparian/stream condition and riparian dependent species, or are designed to protect aquatic resources. Forest specific data is tracked through the stream monitoring program and fish distribution mapping. Occupancy for the purposes of fish distribution is defined by protocols used by fisheries biologists and include verified and documented occurrences. Single specimens or antidotal information is not the basis for concluding occupancy. The Forest Service is not the responsible agency for determining species specific population abundance (census data), but rather will monitor fish distribution as an indicator of properly functioning aquatic habitats under Forest Service jurisdiction. Population status (number of individuals) is influenced by a number of factors outside the control of the Forest Service (e.g., hatcheries, ocean conditions, hydropower operations, etc.). Changes in distribution are tracked over time and are an indicator of cumulative riparian/stream conditions. While subsets of data are obtained annually, longer time horizons are most appropriate for evaluating trend. Trend information is a valuable metric for making conclusions addressing whether aquatic specific Standards and Guidelines are being implemented and effective. If effective, upon taking into account anthropomorphic and natural disturbances, fish should be distributed in the stream network that historically supported the species or no less distributed than current occupancy.</p>

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Bark	<p>Although Bark believes that the monitoring question, “Are projects contributing to the persistence of Survey & Mange Species?” is a good question, they assert that the “monitoring question should be designed to test that assumption by tracking the response of Survey & Mange species to ‘habitat improvement’ projects.”</p> <p>Bark’s comment is regarding proposed monitoring question ii.b.</p>	<p>We have changed this monitoring question to reflect Bark’s suggestion. The question now asks, “Are habitat improvement projects contributing to the persistence of Survey and Manage species?” We have also changed the indicator to state the following: “Acres of habitat enhanced for Survey and Manage species.”</p>
Bark	<p>Bark stated that the “weakest part” of the proposed monitoring elements is the question regarding earthflows. Bark states, “I’m particularly upset about it because I know that every single management project the Forest Service planned in the past five years in Earthflows has exempted itself from compliance with these standards.”</p> <p>Bark’s comment is regarding proposed monitoring question ii.d.</p>	<p>We have clarified this monitoring question to: “Are projects designed to prevent reactivation or acceleration of landslides, debris slides, debris flows, and earthflow areas?” Also, we have changed the indicator to be: “Description of projects that are near landslides, debris slides, debris flows, and earthflow areas and how the projects affect stability.”</p>
Bark	<p>Bark states that the draft monitoring plan abandons numerous specific monitoring questions regarding viability of multiple species with the very broad single query: “trend of habitat needed for persistence?”</p> <p>Bark’s comment is regarding proposed monitoring questions iii.a-d.</p>	<p>The 2012 Planning Rule at 36 CFR 219.9 states that the Forest “is intended to provide ecological conditions to maintain diversity of plant and animal communities and support the persistence of most native species in the plan area.” Therefore, the Forest has decided to measure ecological conditions as described by the 2012 Planning Rule.</p>

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Bark	<p>Because the Planning Rule requires the agency to “contribute to the recovery” of ESA-listed species, Bark recommends that the monitoring questions be changed to recognize the recovery standard rather than “persistence.” They also believe that the monitoring question is too vague and ask the following questions:</p> <ul style="list-style-type: none"> - Does this refer to the trend over time? What time period? Annually? Each decade? - What of the other influences on NSO recovery such as barred owls? - With the indicator only being number of acres of late successional and old growth habitat tracked over time, how will the Forest Service determine if that acreage is seriously fragmented (that is, a high number of acres, in small disconnected pockets) or a series of connected habitats? <p>Bark’s comment is regarding proposed monitoring question iv.b.</p>	<p>We have changed the monitoring question regarding the northern spotted owl to read, “What is the trend for mature and late successional habitat needed for northern spotted owl recovery?”</p> <p>Also, please see the response above regarding the northern spotted owl.</p>

Commenter	Comment	Forest Service Response
Bark	<p>Bark asks the following questions are the Oregon spotted frog:</p> <ul style="list-style-type: none"> - What is the trend for the Oregon spotted frog populations at Camas Prairie? - Is there baseline data of the current population numbers? - Is the population currently stable and/or in recovery? - How often will the visual surveys be conducted, and how accurate are they in determining presence of the spotted frogs? - How will the information gained through these surveys be used to assess compliance with FW-175? <p>Bark's comment is regarding proposed monitoring question iv.c.</p>	<p>The Oregon spotted frog has been surveyed at Camas Prairie every year for the past nine years. The survey protocol used is meant to provide surveyors with a general background and methods to detect presence of spotted frogs; however, it is not intended for monitoring trends in frog populations. Therefore, there is no trend or baseline data for this population. Also, there are very few quantitative comparisons of survey methods for the Oregon spotted frogs. Additional studies are needed to refine survey techniques before it can be determined how accurate these surveys are in determining presence.</p> <p>Compliance with FW-175 (Habitat for threatened, endangered, and sensitive plants and animals shall be protected and/or improved) would be addressed at the project-level and through ESA consultation. At this point, surveys only provide presence information which would not determine compliance with FW-175.</p>
Bark	<p>Bark requests more clear information about which ten elements of the Wilderness Performance Program Score Card will be selected, and how they will actually be monitored.</p> <p>Bark's comment is regarding proposed monitoring question v.b.</p>	<p>The elements were selected to capitalize on existing and past monitoring work; and elements that are compatible with the uses and needs of each wilderness area. For example, air quality monitoring is currently occurring, so that element was selected. Outfitter guide use was selected for wilderness where the use occurs, and not selected for areas where there is no outfitter guide use. Monitoring will be done through stewardship groups, volunteers, and existing efforts.</p>
Bark	<p>Bark does not believe that the following is a monitoring question: "Has the OHV ROD of 2010 been implemented?"</p> <p>Bark's comment is regarding proposed monitoring question v.c.</p>	<p>Implementation of the 2010 OHV Record of Decision is directly tied to the 2005 Travel Management Rule, in which we are required provide annual updates to the Motor Vehicle Use Map based on changes to the transportation system. Further, implementation of the Travel Management Rule is required by the Forest Service's Pacific Northwest Regional Office.</p>

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Bark	<p>Bark asks how the monitoring question about visitor satisfaction assesses the desired condition which refers to the <i>amount</i> of use, not the <i>quality</i> of use. Further, they ask:</p> <ul style="list-style-type: none"> - How is this information going to be gathered? - Will the MHNF conduct surveys of forest users at different locations? - Who will implement these surveys, and with what budget? - How will visitor satisfaction be determined and how will this information be used to assess whether the desired conditions of plentiful, typical and less plentiful use are being met? <p>Bark's comment is regarding proposed monitoring question v.d.</p>	<p>The National Visitor Use Monitoring program is a national program with standardized questions and protocols. It is done every five years on each National Forest. The data is both qualitative and quantitative. Since this is a national program, the Forest is unable to change the protocol. There is specialized funding associated with the survey work and the monitoring has been accomplished through an agreement with universities for field survey work.</p>
Bark	<p>Bark suggests that rather than just the Bull Run Watershed, that the desired condition could be expanded to include all the watersheds on the Forest that provide municipal drinking water. They state, "At the least, the municipal water supplies that are not specifically protected and managed for production of pure, clear, raw potable water, and are dependent on every shrinking glaciers and snow pack, should be the ones that receive the closest monitoring."</p> <p>Bark's comment is regarding proposed monitoring question vi.a.</p>	<p>This monitoring element aims to use a sample watershed for measuring changes, and is not intended for comprehensive sampling. The Bull Run watershed was selected because it has a long history of data collection. Of any surface source of municipal water on the Forest it has the longest period of record and continues to have an operational and well distributed number of gaging sites where water has been sampled and measured for many years. Instrumentation and gaging of source waters that supply other municipal watersheds on the Forest is either absent or discontinuous and not sufficient for strong trend and correlation analysis. Also, the forested landscape of the Bull Run watershed is no longer intentionally managed or manipulated. Its mix of previously managed stands and unmanaged stands could provide comparisons of the forest cover's response to climate change and any correlation to water quality and supply. It also has a contiguous ownership pattern and consistent land use so that findings should not be confounded by multiple uses.</p>

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Bark	<p>Bark asserts that the following monitoring question is too broad: How are any uncharacteristic ecosystem stressors changing natural forest landscape disturbance regimes?</p> <p>Bark’s comment is regarding proposed monitoring question vi.b.</p>	<p>This question was changed to “What are the current tree mortality rates and patterns across the forest?” The indicator is detectable levels of tree mortality. Also, this monitoring question is intentionally worded broadly in order to allow the monitoring efforts to discuss future changes resulting from climate change.</p>
Bark	<p>Bark asks, “Is this still the MHNF’s desired condition for mature forests in the Matrix or Timber Emphasis areas?” Further, Bark does not believe that the questions about how much timber is being harvested and awarded answer whether the desired condition is being met. They state, “It seems like the MHNF is simply trying to ensure that it logs enough forest to meet its PSQ, which doesn’t comfortably fit into the monitoring framework.”</p> <p>Bark’s comment is regarding proposed monitoring question vii.b</p>	<p>The desired condition stated in the Forest Plan on page Four-9 has not changed. However, we have replaced the Forest Plan component to address the timber management objections stated in the Forest Plan on page Four-26. The monitoring question is now, “What is the rate of harvest of stands available for timber management?” The indicator is changed to the acres of timber harvested by land allocation.</p>
Bark	<p>In regards to roads suitable for use, Bark states that the question should be: “What about asking how many miles of road are not suitable for use but are still open?”</p> <p>Bark’s comment is regarding proposed monitoring question vii.f</p>	<p>This monitoring element is aimed at the rate of progress to achieve Road Management Objectives. As an element of Section (vii) regarding multiple uses, roads are proposed as an indicator of how well those opportunities are provided for a variety of users who access the Forest via its system roads. We have changed the Forest Plan component to reflect this management objective by including the Forest Plan’s goal stated on page Four-3.</p>