Response to Public Comments – Ochoco National Forest and Crooked River National Grassland Transition Monitoring Plan

The Ochoco National Forest (Forest) and Crooked River National Grassland (Grassland) transition monitoring plans were developed following guidance in the 2012 Planning Rule, as codified in the 36 CFR 219 regulations, with further direction provided in Forest Service Manual 1920 and Forest Service Handbook 1909.12, Chapter 30. An interdisciplinary team of resource specialists met over the course of several months, beginning in May of 2015, to identify important monitoring elements, questions, and indicators that are responsive to the 2012 planning rule requirements. The Deschutes and Ochoco National Forests leadership team then reviewed the draft transition monitoring plans at two meetings (October 21, 2015, and November 18, 2015) and approved the draft transition plans for the Deschutes and Ochoco National Forests and the Crooked River National Grassland for release for public review and comment.

On January 28, 2016, the Ochoco National Forest/Crooked River National Grassland send letters to the Tribal Chairs and Natural Resource staff of the Confederated Tribes of Warm Springs, Klamath Tribes and Burns Paiute Tribe to initiate government-to-government conversation and invite review and comment on the draft transition monitoring plans. On February 16, 2016, letters were sent to over 200 individuals, federal and state agencies, and organizations to request comments on the draft plans. The Forest and Grassland received comments from four individuals or organizations; comment letters have been placed in the planning record at the Ochoco National Forest headquarters in Prineville, Oregon. The interdisciplinary team reviewed and prepared responses to the comments; comments and responses are captured in the following table. None of the comments resulted in any substantial changes to the plans because the focus of the transitional monitoring plan, as indicated by the 2012 Planning Rule, is on forest plan components, while most comments were related to research, population monitoring, or monitoring of project-specific effects.

Commenter	Comment	Response
Steve and Lori Ontko, Prineville, OR.	Commenters made several handwritten comments on the cover pages of the draft plans; comments related to suggestions about management activities and were not directly associated with the Monitoring Plans themselves. No changes to the plans were recommended.	Thank you for your comments; no response is necessary.
Paula Hood, Blue Mountains Biodiversity Project	The Monitoring Plan's stated questions and elements/indicators will not adequately allow for adaptive management with regard to logging, roading, or (in the Ochoco National Forest) grazing activities. For both the Deschutes and Ochoco Forests, the Forest Service has not shown that the outlined BMP monitoring	The questions that the elements in the transitional monitoring plans respond to are included in the 2012 Planning Rule and are outside the jurisdiction of the Ochoco National Forest/Crooked River National Grassland.

	will be adequate to detect whether or not BMPs in logging projects sufficiently protect water quality. Currently, BMP monitoring criteria only require a handful of sites to be monitored annually. Of these sites, only a small subset of this handful is required to be related to timber sales.	Monitoring of livestock grazing allotments on the Ochoco NF and Crooked River National Grassland is accomplished annually as described in each authorized Allotment Management Plan and is therefore not included as a specific monitoring element. Generally, project-level monitoring is included in the decision documents for vegetation management projects as well. FSH 1909.12, Chapter 30, Section 30.5, discusses the relationship of project monitoring to the Monitoring program. Project monitoring contributes to our understanding of the effects of projects and activities, and can provide useful information to improve resource protection and restoration in the future. Project and activity monitoring can be used to gather information to contribute to these Forest/Grassland Plan monitoring programs, and Plan monitoring may inform the development of specific projects and activities. The Best Management Practices (BMPs) monitoring element reflects the monitoring program as described by the national initiative; this is compliant with the direction at 36 CFR 219.12(c)(3), which indicates that to the extent practicable the monitoring program should take into account existing national monitoring programs.
Paula Hood, Blue Mountains Biodiversity Project	In addition, there is a lack of guidance concerning BMP monitoring. The FS does not have an appropriate or standardized approach to monitoring that includes the necessary statistical robustness (or even close to it), nor are there are monitoring design criteria, that would be capable of detecting potential changes in stream temperature or sediment in relation to timber sales.	Guidance related to Best Management Practices is included in the National BMP Program (April 30, 2012) and is described in the National Core BMP Technical Guide. The National BMP Program is intended to improve agency performance, accountability, consistency, and efficiency in protecting water quality; monitoring, recording and reporting are standardized nationally.

		Monitoring of Best Management Practices (BMPs) is accomplished according to its own specific direction; this direction is not related to the Forest and Grassland Plan monitoring that is addressed by the transitional monitoring plans. However, data from BMP monitoring may be used to answer the monitoring questions for each bi-annual monitoring report.
Paula Hood, Blue Mountains Biodiversity Project	The Oregon Department of Forestry has developed a relatively simple riparian and water quality monitoring design (the RipStream monitoring design) that includes, for example, before and after as well as an upstream and downstream stream temperature monitoring design that are much more effective at determining compliance with water quality standards such as stream temperature. This design could easily be adopted into monitoring plans on the Ochoco and Deschutes National Forests.	Compliance with water quality standards is generally accomplished at the project level through project design, and is therefore monitored at the project level when appropriate. The results of that monitoring may be used to answer the monitoring questions for each bi-annual monitoring report. Forest/Grassland Plan monitoring will be accomplished on specific streams important to fish populations and/or contributing to downstream habitat; this monitoring may not track project-specific effects. FHS 1909.12, Chapter 30, indicates that the scope and intent of the Monitoring Program is to test assumptions, track changes and measure management effectiveness and progress toward achieving or maintaining the Plan's desired conditions or objectives.
Paula Hood, Blue Mountains Biodiversity Project	The Plan also lacks the ability to detect how most MIS and T & E species are responding to management activities such as logging. The USFS's underlying assumptions that fuels reduction is good and that bark beetles are bad is reflected in the plan. The plan proposes to monitor, for example, how well management has achieved fuels reduction goals— goals which are defined by the USFS but that lack sufficient analysis of the full range of scientific opinion about natural fuel loading levels. There is a large body of science that shows that these assumptions are controversial. The plan does not, unfortunately, include monitoring of species that depend	Research regarding the effects of management activities on particular species is outside the scope of Forest Plan monitoring. Forest Plan implementation at the project-level is subject to standards, guidelines and regulation intended to provide habitat for a variety of species. Project-level monitoring may be used to answer the monitoring questions for each bi-annual monitoring report. These monitoring plans do have elements that address focal species that represent important ecological conditions associated with current Management Indicator Species (MIS), threatened species and sensitive species (there are currently

	on: higher forest density, post-fire habitat created by mixed and high-severity fires, snags, mixed-conifer habitats, and bark beetles—or how are these species are responding to the widespread and ubiquitous logging projects that reduce fuels, further fire suppression, open forest canopy, and alter fire and vegetation regimes further from historic norms. At the very least, the Forest Service needs to recognize that there is a large body of legitimate scientific controversy regarding these issues, and that their monitoring plans need to address and include how management activities are affecting MIS, T&E species, water quality, snags and downed wood, and soil condition with regard to these issues and their potential impacts and risks. It is not clear that the monitoring plan, as outlined, will accomplish this, or that monitoring will be sufficient to indicate whether changes in management strategies are needed in order to protect these resources. It is clear that many of these relevant questions regarding ecological functions and species viability in response to management activities have been left out of the monitoring plan.	no listed endangered species on the Ochoco National Forest or Crooked River National Grassland). These monitoring programs include aquatic habitat and snag habitat, where appropriate.
Paula Hood, Blue Mountains Biodiversity Project	Stream temperature violations are the most widespread water quality issue on National Forests in Eastern Oregon. The Forest Service does not have an adequate understanding of how their logging projects and other land management activities affect stream temperature. Stream temperature probes (dataloggers/hobo probes) are comparatively cheap, easy, and not labor intensive to deploy. They give large amounts of high quality data, including diurnal stream temperature fluctuations (which are also very important to look at and have been shown to have significant effects on salmonids). Stream	The monitoring element that will evaluate stream temperatures will be done on specific streams important to fish populations or contributing to downstream habitat. Monitoring of project-specific impacts to stream temperature is not a specific component of the Transition Monitoring Plans. FSH 1909.12, Chapter 30, indicates that the scope and intent of the monitoring program under the 2012 Planning Rule is to test assumptions, track changes and measure management effectiveness and progress towards achieving or maintaining the Forest/Grassland Plans' desired conditions or objectives.

	temperature is directly tied to stream health, listed fish, and stream ecosystem resilience. Stream temperature is an important water quality component that is crucial to species and ecosystem health, and is potentially affected by logging (and grazing in the Ochoco) and is therefore very important for the USFS to directly monitor in a more widespread and thorough manner that allows for adaptive management.	Devices to monitor stream temperature include those listed by the commenter.
Paula Hood, Blue Mountains Biodiversity Project	**Habitat quality as a surrogate for species viability is insufficient to ensure viability of native species, or recovery of sensitive and T&E species.** Monitoring habitat as a surrogate for monitoring species trends and viability is a risky strategy, and may yield unintended/unexpected results. For example, in the Draft Blue Mountains Forest Plan Revision (2014) the tables showing habitat quality and fish populations reflect that many streams and watersheds that the USFS categorizes as having "good" and "fair" habitat quality contain fish populations that are declining and/or at imminent risk of extinction. Such issues with inaccuracy and mismatched trends make it clear that the USFS does not have sufficient understanding of habitat parameters or modeling criteria to accurately predict how landscape conditions and management activities will affect habitat quality and, in turn, species viability. Monitoring protocols need to include much more robust direct monitoring of specific species and their population trends.	The identification of focal species is not meant to be a surrogate for species viability. Focal species are selected because they are believed to be indicative of key characteristics of ecological integrity and are responsive to ecological conditions in a way that can inform plan decisions. A focal species could be a keystone species, an ecological engineer, an umbrella species, a link species, or a species of conservation concern, but it need not be in any of these species categories. Monitoring questions should relate the species to the ecological condition and reason for its selection, and indicators may include affected attributes of the species, such as presence or occupancy, habitat use, reproductive rate, and population trends. (FSH 1909.12, Chapter 30, Section 32.13c).
Paula Hood, Blue Mountains Biodiversity Project	Species monitoring should include full population studies over a period of years (and should include status, repro success, and viability thresholds). Species that need high forest density, mixed and high-severity post-fire areas,	See previous response related focal species monitoring. Research regarding the effects of management activities on particular species is outside the scope of Forest Plan

	and mixed-conifer forests should be specifically monitored. This includes American marten, Pacific fisher, Northern goshawk, Pileated woodpeckers, and Black-backed woodpeckers.	monitoring. However, in some cases monitoring of reproductive success and/or population monitoring is an important part of the monitoring protocol and will be included in the monitoring report.
Paula Hood, Blue Mountains Biodiversity Project	The Forest Service needs to examine actual species' response to mixed and high-intensity fires in post-fire habitats. There are accumulating scientific studies and evidence showing that mixed and high-intensity fires are not unnatural or catastrophic, and that species (including Northern spotted owls and Pacific fisher) are more successful in these habitats than the USFS has assumed. Monitoring of post-fire areas that have not been degraded by salvage logging or replanting needs to be conducted.	Research regarding the effects of wildfire on particular species is outside the scope of these transition monitoring plans.
Paula Hood, Blue Mountains Biodiversity Project	Deer and elk populations should be monitored in response to forest density reductions, including reductions to hiding and thermal cover as a result of logging projects and other fuels reduction activities. Particularly in the Deschutes National Forest, where large areas of cover have been lost due to logging, many monitoring opportunities are available to examine the response of deer and elk populations in these areas.	The monitoring plans are not intended to provide research on or evaluate the response of species populations to management activities. Deer and elk monitoring is under the jurisdiction of Oregon Department of Fish and Wildlife (ODFW); the Forest Service uses ODFW's data as necessary. These plans include monitoring elements related to deer and elk habitat.
Paula Hood, Blue Mountains Biodiversity Project	Road monitoring should include looking at road density calculations that include "temporary" and closed roads, as well as the miles of "temporary" road constructed vs. actually obliterated. The USFS needs a more honest accounting of road impacts on the ground, and monitoring of how the real road densities affect watershed hydrology, water quality, and species sensitive to road-related issues. The Forest Service also needs a more accurate and honest monitoring of real road density trends. Timber sales often claim to use only old	Closed roads are a part of the transition monitoring plans' element for transportation. Closed roads, also known as maintenance level 1 roads, are defined as those roads needed for future administrative use but are generally closed to motorized traffic until future administrative access is needed. Closed roads are not temporary roads. Temporary road management, including densities and obliteration, is reflected in the implementation of timber sale

	road beds which are already disturbed but also fail to show up on the road network or in any road density calculation. At the same time, the USFS says that road-related impacts and new roads will not exceed the duration of a given project, at least not for more than a few years. The Forest Service can't have it both ways—either road-related impacts are more widespread than previously disclosed or understood by the public, or new projects are actually creating more widespread impacts than the USFS admits. Monitoring needs to include "temporary" and closed roads in a thorough and accurate accounting.	contracts and sale administration documentation but will not be part of the transition monitoring plan.
Paula Hood, Blue Mountains Biodiversity Project	Invasive plants should not only be monitored in "treated" sites but also in high-risk areas for invasive plant introduction and spread including logging projects (especially slash piles), roads, and livestock areas (for the Ochoco).	The monitoring of high-risk areas for potential invasive plant introduction and spread, in particular for logging and roading projects, is conducted during project specific analysis. It is normal practice to include an evaluation of the risk of invasive plant introduction as part of the NEPA analysis for a ground disturbing project. Additionally, consistent with Forest Plan direction, it is required to include prevention mitigation measures in the project's design. An important monitoring element for invasive plant treatment is reporting on the results and the effectiveness of treatment, especially treatment with chemicals and that the objective is to reduce the amount of chemicals in treated sites. Project monitoring is tracking the use of prevention practices and surveying high-risk areas after management actions. Project-specific monitoring may inform the transition monitoring report.
Paula Hood, Blue Mountains	Climate change monitoring should include potential cumulative and synergistic effects in combination with	Research on climate change is outside the scope of Forest Plan monitoring; however, a variety of ongoing monitoring efforts

Biodiversity Project	land management activities such as logging and (for the Ochoco) grazing in relation to environmental impacts such as water quality, sensitive/at-risk species population trends. Stream flows and temperature, as well as effects on at-risk aquatic species should be monitored for possible synergistic effects from logging projects and climate change. Monitoring should include how climate change is affecting baseflows and stream connectivity. Climate change monitoring should also include carbon storage accounting. Carbon storage and emissions should be tracked and disclosed in managed vs. unmanaged forests.	on the Forest and Grassland may be used to answer the monitoring questions for each monitoring report. Stream temperatures and flows on select streams will be monitored as part of these transition monitoring plans.
Paula Hood, Blue Mountains Biodiversity Project	**Dead wood (snags, downed wood) density and trends should be monitored in relation to logging projects including thinning, prescribed burning, and other fuels reduction/fire suppression, and "restoration" activities.** The effects of logging and fuels reduction activities should monitor effects on forest structure and complexity. Microclimate should also be included in monitoring of logging projects, as it is not clear whether fuels reduction efforts are simply drying out forests and potentially increasing fire risk.	Snag monitoring for several plant association groups is an element in the Ochoco NF's transition monitoring plan and will be evaluated at the forest level. This monitoring will reflect the changes in snag density and composition across the forest and will incorporate changes as a result of prescribed burning, vegetation management and wildfire impacts. The Forest and Grassland plans to not include components related to microclimates; therefore, monitoring of microclimates is not included in the transition monitoring plans.
Paula Hood, Blue Mountains Biodiversity Project	The potential effects from logging projects on bats are not sufficiently understood or accounted for in the monitoring plan. For example, how is the continued loss of snags from logging affecting Pallid bats or Townsend's big-eared bats. Bat species populations and the effects of logging on population trends should be monitored.	The Forest's monitoring plan includes monitoring of snags. The request to monitor specific populations of bats and their trends as a result of logging is more appropriately addressed by research and is not associated with a Forest Plan component.
Micah Wilson, Ranch Manager, IZ Ranch	Under the current monitoring protocol that the Ochoco National Forest uses, you are monitoring dry creek beds. The IZ Ranch runs on the Sunflower Allotment and there	These comments relate to allotment-specific monitoring as described in Allotment Management Plan analyses and authorized by associated decision documents. The Forest Plan

	are several non-perennial streams that are monitored. The monitoring of the streams seems to be excessive since there is no water in many of the creeks, but what seems more excessive, is the stubble height requirement in these dry creek beds. Many require us to leave 6 inch stubble height. Many of these streams to not grow to 6 inches. That coupled with the wild horses that take up residence on these areas, make this an often times unattainable goal. One answer would be to eliminate monitoring in these sights altogether, but another would be to lower the standard to 3 inches. 3 inches provides enough grass cover for stream bank stability. It will still be difficult to meet this in some areas with the horses grazing the creeks to the ground, but it would help in areas that are not destroyed by horses. In order to offset the problems caused by the horses, we also suggest that the monitoring be done immediately after the cattle leave the pasture in order to determine end-of-season monitoring requirements. This would give a closer representation of what we are accomplishing with our herding practices and show the damage done by the horses without the effect of cattle.	monitoring plan is not a tool with which a Forest can change range monitoring that is authorized under current Allotment Management Plans, and nor is it a tool with which to change standards in the existing Forest or Grassland Plan. The results of range monitoring may be used to answer the monitoring questions for each bi-annual monitoring report, and may be used to inform Forest/Grassland Plan revision when that process is started.
Chris Richard, Operations Forester, Interfor, Gilchrist, OR	Interfor supports the Forest in the Transitional Monitoring Plan. In addition, Interfor feels that unnaturally large and hot wildfires, as well as insects and disease are having the biggest impacts on the Forest at this time. We all need to do what we can to increase the pace and scale of fuels reduction and treatment, increase	Thank you for your comment.

	forest resiliency to insects and disease, and bring the forest back to Historic Range of Variation.	
Chris Richard, Operations Forester, Interfor, Gilchrist, OR	In regards to watersheds: Thinning in watersheds not only increases the volume of water released, but compared to watershed that has been devastated by wildfire, it has a cooler temperature and a slower pace by which that water is released. Wildfires on important watersheds degrade stream habitat from increased sedimentation, higher temperatures, and higher flow rates. By making our forest more fire resilient, we help everyone downstream including fish and wildlife. Closely monitoring streams and watersheds following wildfire will help illustrate this point.	The effects of wildfire on habitats and water quality is not a Forest Plan component that can be monitored. However, post-fire monitoring and management does occur on the Ochoco National Forest to the extent that funding and staffing levels permit. The results of post-fire monitoring may be used to answer the monitoring questions for each monitoring report.
Chris Richard, Operations Forester, Interfor, Gilchrist, OR	In regards to ecological conditions of aquatic and terrestrial ecosystems and wildlife: Thinning watersheds to prevent catastrophic wildfires, helps prevent erosion, provides cooler water temperatures, and provides more steady and predictable flow rates. Thinning also helps reduce the competition for scarce resources, and reduces mortality from insects and disease. In terms of terrestrial habitat, Interfor noticed there was no mention of the lack of/need for early seral forest forage in this monitoring plan. With another season of dismal hunting behind us, let's look for ways to improve habitat and forage opportunities for mule deer and Rocky Mountain elk, as well other non-game species. Hunters are often multi-generation, life-long sportsman, who like their mothers and fathers before them; enjoy spending time in the outdoors. By ensuring hunter access and suitable game habitat, we ensure future generations of outdoorsman and women. By monitoring hunter success,	Monitoring of game and non-game species, as well as management of hunting opportunity, is under the jurisdiction of Oregon Department of Fish and Wildlife. The ONF/CRNG Plans include standards and guidelines for the protection of habitat for game and non-game species. Project-level planning generally includes design criteria intended to insure that standards and guidelines are met, and project-level monitoring often addresses these standards and guidelines. The results of project-level monitoring may be used to answer the monitoring questions for each monitoring report.

	along with bird, reptile, non-game wildlife counts, and inventory critical habitat areas, we can keep a closer watch on wildlife populations.	
Chris Richard, Operations Forester, Interfor, Gilchrist, OR	In regards to the socio-economic impact of the forest on local communities: The forest has a large impact on local, rural communities. Sawmill and logging jobs are some of the best paying, stable, and respected professions in rural Oregon. The forest is directly tied to the economic health of these communities. By harvesting timber at a sustainable level, thinning and fuels reduction we ensure the health of such communities as well as the forest itself. Interior's mill in Gilchrist recently cut our production from two shifts to one in response to the tack of affordable sawlogs. It has been hard on the local communities, and we fear what may happen if this trend continues. Monitoring available affordable sawlog volume and rural economic stability would hopefully reinforce to the Forest what small rural communities already know.	Current monitoring efforts address levels of production of multiple uses including timber, special forest products, mineral materials and recreational visits. The effects of this monitoring may be used to answer the monitoring questions for each monitoring report.