

Comments Received on Revised Forest Plan Monitoring Program March 2016

Commenter	Comment	How addressed
Gifford Pinchot Accountability Group (GPAG)	All monitoring should be done at a minimum of watershed or preferable on Forest wide or species wide scale. Past monitoring has been focused on a small site scale, resulting in every square foot of the Forest being identified as critical by one specialist or another.	The Forest has developed the most appropriate scale for each monitoring. Indicator. For many indicators the scale is Forest-wide.
GPAG	We question if the monitoring plan is realistic and supported by the public. We question if the Forest will commit funding or personnel to accomplishing the monitoring plan.	One main objective of the revision is to ensure that Forest staff can accomplish what is set out in the plan. Many indicators were removed or scaled back to ensure that funding can cover the required monitoring laid out in the new monitoring program.
GPAG	Too often monitoring on this Forest is used as an excuse for not providing a complete planning effort, resulting in project plans with less than a true picture of effects. Lack of monitoring has been used repeatedly on this Forest as an excuse to not seek direction or support to move forward on recovery or evaluation of the real effects on or status of resources being monitored.	The intent of the Forest Plan Monitoring Program is to ensure that the Forest Plan is being implemented as set out in the original plan from 1990. While project planning may tie to the monitoring data, the monitoring program itself would not hold up project efforts.
GPAG	Any Monitoring plan must include the Forest mission of providing products, access and economic stability of local rural communities. Any negative effects resulting from monitoring should require the Forest to offset the economic or access loss to the rural public. Any monitoring must include effects on human uses. The Gifford Pinchot is designated as multiple-use and is not a National Park, Reserve or Refuge area.	There are indicators related to resource outputs and economics under the sub-category "VII. Progress toward meeting the desired conditions and objectives in the plan, including for providing multiple use opportunities" (GP Monitoring Program, page 35). These indicators were in the original 1990 Forest Plan and have been carried over.

GPAG	Any monitoring must include long-term management effect. A long term Forest objective (no less than 30 years) must be established identifying a management plan to an end desired condition.	Forest staff strove to develop the most appropriate time period for each monitoring indicator. While data collected for some indicators may be annual, most analysis and reports will be focused on long-term trends.
GPAG	Key resource, species or products need to be identified for monitoring. Not every species, resource or product needs to be monitored.	The monitoring program is not exhaustive and narrows its focus on key species, habitats or other appropriate indicators.
GPAG	Management plans need to be developed and upgraded for any resource or species monitored.	The intent of the Forest Plan Monitoring Program is to ensure that the 1990 Forest Plan is being implemented as designed. The Forest will use monitoring data to evaluate trends that may indicate the need to amend or revise the Forest Plan.
GPAG	Monitoring and reporting frequency need to be established. Management plans need to be developed and upgraded on a regular schedule for any monitored resource, species or product	The monitoring plan does include both data collection and reporting frequency.
GPAG	Monitoring should be done on all plantations under 100 years of age to ensure management is being conducted to maintain forest health and habitat development.	Several monitoring issues included in the revised monitoring plan may address this suggestion, including: Habitat Function/ Forest Structure, Silvicultural Practices and Resource Outputs. While the revised Forest Plan Monitoring Plan focuses on Forest Plan implementation, project monitoring is also occurring on the Forest and may also address habitat in plantations.

<p>GPAG</p>	<p>GPAG is skeptical of the purpose of this monitoring plan and see it as being used by the Forest for locking up and restricting more land from human uses and by specialist to slow down and make projects economically restrictive.</p>	<p>Monitoring Forest Plan implementation and effectiveness is nothing new and was required under the original planning rule when the Gifford Pinchot Forest Plan was developed in 1990. The 2012 Planning Rule (36 CFR 219.12(c)(1)) requires that all land management plan monitoring programs be updated to meet the requirements of the new rule.</p>
<p>WA Dept of Ecology</p>	<p>It is not clear if you are monitoring only riparian wetlands or if you have plans to monitor other hydrogeomorphic wetlands. Your document mentions: The main purpose of the riparian reserves is to protect the health of the aquatic system and its dependent species (NWFP ROD, p. 7). The 9 ACS Objectives, specifically objective #4 Maintain and restore water quality necessary to support healthy riparian, aquatic, and wetland ecosystems” (NWFP ROD, p. B-11). Beyond water quality, wetlands perform flood storage and habitat functions among other things which should be preserved and could be monitored.</p>	<p>One entire monitoring issue is devoted to addressing monitoring questions related to riparian reserves. Wetlands (wet or dry) greater than one acre in size are given a riparian reserve.</p>