

**HUNTER INTEGRATED RESOURCE PROJECT**  
**Appendix B Response to Comments**

Scoping Summary

<b>Commenter</b>	<b>Comment</b>	<b>Response</b>
<b>Clackamas Stewardship Partners (CSP)</b>	<p>S1. The majority of CSP members support the following:</p> <ul style="list-style-type: none"> <li>• Variable density thinning with skips and gaps in Matrix areas with the understanding that accessing additional information may alter their positions and support.</li> <li>• Logging in fire-originated stands as well as logging in the contiguous 2,135-acre area with no roads.</li> <li>• Shelterwood harvest in lodgepole plantations and replanting with native species to improve wildlife habitat and reduce forest fire risks.</li> <li>• Pruning western white pine trees with risk of blister rust infection.</li> <li>• Efforts to improve critical habitat for northern spotted owls by removing brush and small diameter hemlocks infected with dwarf mistletoe and replanting with native species.</li> <li>• Regeneration harvest in the 98 acres of Matrix to improve wildlife forage opportunities. Seeding with native forage species and guzzler installations.</li> <li>• Efforts in existing forage areas to remove small encroaching conifers and shrubs pruned or cutback. Controlling invasive plant species is a priority and volunteer involvement may be a cost effective approach.</li> <li>• Controlled burning to restore forage opportunities and maintain riparian habitat.</li> <li>• Tree removal under and adjacent to power lines is recognized by CSP members as necessary. The Forest Service is encouraged to work with the Bonneville Power Administration and CSP members to identify compatible wildlife forage development opportunities and potential volunteer participation.</li> </ul>	<p>Thank you for your support.</p>

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	<ul style="list-style-type: none"> <li>• Removal of dangerous trees along Forest Service roads and their use for instream restoration projects and for firewood when appropriate.</li> <li>• Proposed changes to system roads that will contribute towards the goals of “right-sizing” the road system by decommissioning, closing and storm proofing both closed and open roads that have been identified as not needed by the Forest Service.</li> <li>• Culvert replacement projects.</li> <li>• Dispersed recreation rehabilitation.</li> </ul>	
<b>CSP</b>	<p>S2. Roads 4660-140, 4660-170, 4660-120, 5731-120 are all NEPA ready roads for decommissioning with delay. We recommend a closure after Hunter implementation to address the current breached closures and potential increased access after the Hunter project occurs. This would maintain the current closures until after the roads need to be accessed again, after which point they could be decommissioned under their original NEPA.</p>	<p>Roads used by the Hunter project (4660120, 4660140), would have new berms installed afterward. However, road closures on relatively flat ground can be breached by drivers that are determined. These breached road closures are on flat ground or ridgetops and are a low aquatic risk. For these reasons, the roads were specifically closed to reduce road maintenance costs on the Forest. Since the roads are not being maintained, that objective is being met even though some closures are breached by unauthorized users. Although new berms would be installed upon completion of project activities, there is still a chance that an unauthorized user could breach a berm by going around it and it is not likely that a bigger berm would deter all unauthorized users. The Forest intends to prohibit access; however, it is also prudent to acknowledge that unauthorized use may occur. Because these roads pose a low risk to aquatic resources, the berms proposed in this project would be similar to the berms previously constructed on these roads.</p>
<b>CSP</b>	<p>S3. Roads 4680-124, 4680-125, 4640 and 4650-012 are “likely not needed” under TAR. We recommend closing with entrance management after project completion and requests that the Forest Service include in the analysis.</p>	<p>These roads are included in other NEPA decisions for decommissioning or closure. This planning effort is not revisiting the previous decisions.</p>
<b>CSP</b>	<p>S4. 4600-330. This loop road that accesses at least 6 dispersed camping sites has low maintenance costs and should remain open.</p>	<p>This road is 3.6 miles in length and is currently coded as Maintenance Level 2 in the Forest’s database. There is currently minimal erosion occurring and some maintenance</p>

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	<p>CSP members encourage the Forest Service to consider other options to reduce road maintenance costs.</p> <p>Road 4600-350 accesses Bump Lake and needs brushing, grading and water bars. Road 4691 has running water on its surface and needs simple grading and perhaps water bars.</p> <p>There is a side road off 4691 (4691-120) that access Si Lake that is in bad condition and should be evaluated.</p> <p>4670-220 and 4670-031. Access to Mt. Lowe should not be closed off. There is a great multiple peak vista from Mt. Lowe and access to popular the Rho Ridge trail. A dispersed camping spot is located at the end of 4670-031.</p>	<p>would occur with the Hunter project. This road makes sense to leave open even though there is limited long-term funding to maintain it.</p> <p>These roads are included in a retained receipts proposal. This type of road maintenance does not need to be included in the Hunter EA.</p> <p>Thank you for this information; this has been added to the proposed action.</p> <p>These roads are 0.54 miles in length and are currently coded as Objective Maintenance Level 1. This indicates the roads should be closed to reduce road maintenance costs. However, the values present here warrant leaving them open. These would be changed to Objective Maintenance Level 2 and left open even though there is limited funding to maintain them.</p>
<b>CSP</b>	<p>S5. CSP supports the use of <b>stewardship contracting</b> to implement resource management projects included in the Hunter Integrated Resource Project. The exchange of goods for services and the retained receipts generated by stewardship contracting are effective tools for accomplishing resource management projects both on and off forest which improve forest health and support local/regional economies.</p>	<p>Thank you for your support of stewardship contracting.</p>
<b>CSP</b>	<p>S6. Bark submitted a “minority” letter using the CSP letterhead.</p>	<p>The comments in this letter are fully duplicated by Bark’s scoping letter reply below.</p>
<b>Oregon Hunters Association Pioneer Chapter</b>	<p>S7. 4600-330. This loop road that accesses at least 6 dispersed camping sites has low maintenance costs and should remain open. We encourage the Forest Service to consider other options to reduce road maintenance costs.</p> <p>4600-350. The road that accesses Bump Lake needs brushing, grading and water bars.</p>	<p>See response to comment #S4.</p>

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	<p>4691. The road has running water on its surface and needs simple grading and perhaps water bars. There is a side road off 4691 that access Si Lake that is in bad condition and should be evaluated.</p> <p>4670 220 and 4670-031. Access to Mt. Lowe should not be closed off. There is a great multiple peak vista from Mt. Lowe and access to popular the Rho Ridge trail. A dispersed camping spot is located at the end of 4670-031.</p>	
<b>AFRC</b>	<p>S8. AFRC supports the purpose and need of the project's vegetation management component which is to treat part of the approximately 30,000 acres of plantations of various ages which were created by past regeneration harvests. The stands were subsequently planted with conifers and now need to be thinned to promote stand growth and complexity, enhance forest health, and improve the habitat for the northern spotted owl. In addition, the project area contains about 260 acres of forested land that seeded in following a fire approximately 100 years ago. Those stands are now densely stocked and competing for resources such as soil nutrients, water, and sunlight.</p>	<p>Thank you for your support.</p>
<b>AFRC</b>	<p>S9. Since 48,590 acres in this project are designated as Matrix lands under the Northwest Forest Plan – a land designation intended to provide sustained-yield timber production – AFRC believes that an additional purpose and need for this project should be developed. The modified purpose and need would include explicit language indicating the project's need to support local forest infrastructure and the jobs these companies provide to the rural communities where they are located. AFRC members including Interfor, WKO, RSG, Boise Cascade, Hampton, Columbia Vista and others depend on wood from the Mt. Hood National Forest to keep their doors open. This project should also have a focus of providing the raw materials these operations need. At least 12 jobs are created for every 1 million board feet of timber harvested, and putting a focus on increasing the timber volume from this project would benefit jobs in the local area. Maintaining</p>	<p>There will be a purpose and need statement that addresses this.</p>

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	this infrastructure is important to ensure that the Forest will continue to have needed tools for forest management.	
<b>AFRC</b>	S10. The project area contains approximately 30,000 acres of plantations, yet only 1,880 acres are scheduled for treatment. AFRC suggests that each of the plantations be reexamined to make sure all commercial stands are entered and thinned. The planning area is very large, and most likely this area won't be reentered for a decade or two, and those stands that are of merchantable size should be treated. As pointed out in your scoping letter, many of these stands are stagnated and growth has been slowed due to overcrowding. The plantations are homogeneous so thinning is needed to increase stand complexity.	The Interdisciplinary Team examined all stands in the project area to determine the appropriateness and feasibility of thinning. The stands that were not included were either already thinned recently or were too young to make thinning economically viable. It is likely that many of these young stands will be ready for thinning in 10 years and they will be examined at that time for inclusion in a thinning project.
<b>AFRC</b>	S11. There are 48,590 acres of Matrix in the planning area, and AFRC suggests that all of these acres be reexamined for possible treatment. Matrix as defined in the scoping notice is defined as "where most timber harvest and other silvicultural activities are conducted". Matrix lands also contain a variety of age classes and species mix. The older age classes of timber found on some of these lands produce a product that several of AFRC's members need in their manufacturing. Matrix lands also provide an opportunity to use the regeneration harvest tool which also enhances deer and elk habitat. Currently there are only 260 acres planned for harvest in fire-originated stands. While we support the proposed treatments, AFRC believes hundreds of additional acres of older tree management could and should be included in this project.	The Interdisciplinary Team examined fire-origin stands and older stands in the project area. Many stands have already been thinned.  Examining options for regeneration harvest in older stands would require the agency to restart the planning process at the beginning and would involve survey and manage work, restarting owl consultation, redoing the effects analysis and restarting public scoping. While regeneration harvest is permitted in the matrix, the Forest chose to focus it on a plantation where forage species are present. The District developed a proposed action that seemed prudent and feasible to achieve the goals of the Forest Plan as amended. While other opportunities may exist, the impacts to resources can be minimized by spreading actions out over time.
<b>AFRC</b>	S12. AFRC recommends regeneration harvests or heavily thinning the plantations adjacent to the utility corridors (BPA Powerline). During last fall's field review, a variety of treatments were discussed including regeneration harvests to lighter thinnings. AFRC supports using regeneration harvests along the corridor. At a minimum, if thinning is the tool to be used, harvesting to a low basal area retention would be preferred.	All of the larger trees will be removed in a prescription that is not similar to thinning or regeneration harvest because the goals are dramatically different.

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<b>AFRC</b>	S13. AFRC recommends using the roadside hazard management tool as a way of dealing with both removal of hazard trees, and providing maintenance to system roads. The Mt. Hood National Forest receives thousands of visitors each year and removing roadside hazard trees benefits public safety, provides a method for maintain system roads, and provides timber for the local timber industry infrastructure. The Forest can include a large roadside management component to this project or possibly use available roadside categorical exclusions to get this work done. To expedite roadside hazard work, a categorical exclusion can be designated separately from the main project.	The project will include danger tree removal.
<b>AFRC</b>	S14. Deer and Elk habitat enhancement is one of the purposes of this project. AFRC suggests expanding the nearly 20 small forest openings to increase forage for these species. Meadow expansion and enhancement is a tool now being used on several national forests, and thinning out or removing surrounding conifer trees has shown to provide many benefits to wildlife, hardwood species and diversification.	Each forage opening has a different prescription based on site-specific need.
<b>AFRC</b>	S15. AFRC supports the plan to conduct road maintenance on 127 miles of Forest Service System Roads in the Hunter Project. The Mt. Hood National Forest receives thousands of visitors each year, and having an adequate road system in place for recreation as well as access for timber harvest is needed. Since road budgets have been reduced in recent years, it only makes sense to get the needed road maintenance accomplished with this vegetation management project. Road maintenance will reduce the risks of sediment delivery.	Thank you for your support.
<b>AFRC</b>	S16. This project will also provide a good opportunity to conduct some aquatic/riparian improvements including the replacement of two undersized culverts found within the Hunter project and placement of large woody debris in creeks where it is needed. AFRC supports these efforts in conjunction with the project since the timber to be removed should help fund this work.	Thank you for your support.
<b>AFRC</b>	S17. AFRC supports the Forest Service's use of an Environmental Assessment on this project.	Thank you for your support.

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<b>Interfor</b>	<p>S18. There are 30,000 acres of plantations in the planning area with only 1,880 acres receiving variable density thinning restoration. Interfor fully supports the acres proposed for treatment, however believes the Forest is missing opportunities to harvest more acres in this planning phase than what is being proposed.</p> <p>Please find attached map of stands Interfor has identified on the ground the Forest should reconsider applying treatment. We did not have the time or resources to cover the entire project area, so there is potentially more acres to add not yet identified.</p>	<p>See response to comment #S10. The Interdisciplinary Team examined the map provided and visited the sites in the field. The team's field reconnaissance and stand exams determine which of the plantations are silviculturally and economically appropriate at this time. Occasionally some stands may seem close to being ready for thinning but a judgement call is made that the optimal timing of thinning would be better after several more years of growth; these stands are deferred until the next planning effort in 8 years or so.</p>
<b>Interfor</b>	<p>S19. The planning area is comprised of 6,100 acres between the ages of 40 and 65 in the Matrix land designation which have not yet been commercially thinned. Interior recommends the acres in this category, which can provide commercial forest products, receive commercial harvest treatment within the scope of this project.</p>	<p>Our analysis, which has been borne out by field reconnaissance, shows that many stands, particularly in the higher elevations, are not ready for thinning by age 40. Every stand is different due to the many variables of its history and site quality. Many stands are not likely to be appropriate for thinning until about age 60. There are many factors that account for this including a short growing season at high elevations, lower than normal seedling survival due to dry growing conditions and heavy brush competition.</p>
<b>Interfor</b>	<p>S20. Interfor supports the regeneration harvest prescription on 98 acres and would encourage the Forest Service to utilize this tool to treat more acres. Interfor would like to remind the Forest Service the goal for CI Timber Emphasis Matrix land designation is to "Provide lumber, wood fiber, and other forest products on a fully regulated basis, based on the capability and suitability of the land" (Land and Resource Management Plan page Four-289). Interfor suggests the land is capable of producing more than what the Forest Service is proposing and the primary barrier is the "management practices" chosen to apply to this land designation. Interfor suggests the application of regeneration harvest and the associated economic and environmental analysis on CI Timber Emphasis land be far superior to the equivalent associated with variable density thinning. Interfor requests the Forest Service</p>	<p>See response to comment #S11. Regeneration harvest in plantations is limited in the Forest Plan to areas that have exceeded 95% of mean annual increment except where necessary to meet other resource objectives. The Matrix land allocations are also overlaid by critical northern spotted owl habitat that carries with it some other objectives for owl recovery. The District is examining other opportunities to achieve timber quantity goals. At this time, the proposed action represents an integrated resource approach and includes a mix of thinning and other vegetation manipulations to achieve the goals of the Forest Plan as amended.</p>

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	to clarify why prescriptions that generate more harvest volume/acre and correlated revenue aren't being utilized.	
<b>Interfor</b>	S21. Interfor would like to remind the Forest Service of line FW-188 on Four-71 of the Forest Plan: "Management population objectives for each project planning area shall be coordinated with Oregon Department of Fish and Wildlife." Interfor supports the habitat enhancement proposals in the scoping letter. However, the lack of early seral habitat creation in the past 25 years has reached a critical level, and more impactful management prescriptions should be implemented than what are being proposed. Increasing the use of Gaps both in quantity and size, and increasing regeneration harvest acres are ways of promulgating early seral habitat.	The project area has a limited ability to provide early-seral habitat. The primary purpose of the project is to enhance health and growth while providing forest products. In many stands, the palatable browse plants are not present. When the Northwest Forest Plan was developed to provide for late-successional species, it was recognized that early-seral dependent species would likely decline. The project area is overlaid by critical northern spotted owl habitat that carries with it some other objectives for owl recovery.
<b>Interfor</b>	S22. The USFS 's proposing to treat 1480 acres Of Matrix and 400 acres of LSR and Riparian Reserve with the same prescription - Variable Density Thinning. Each land designation has primary objectives to achieving desired results. Interfor does recognize that a forest can be multiple-use, however questions that the primary objectives for each land designation can truly be achieved by proposing the same treatment? While multiple land designations can "benefit" from the same prescription, it is not to say the primary objective was achieved. Interfor recommends the Forest Service to apply prescriptions that meet the primary objectives of the land designations.	The District has chosen to use the variable density thinning prescription with skips and gaps that was developed for thinning in Riparian Reserves and Late-Successional Reserves, in Matrix areas as well. This is considered appropriate because there are other objectives in Matrix besides timber production including scenery management and wildlife management. The prescriptions will vary somewhat from unit to unit based on land allocation; for example, there will be greater quantity of skips in LSRs.
<b>Interfor</b>	S23. Interfor supports the following: Shelterwood removal of the lodgepole pine to reestablish a healthy, productive forest stands on 116 acres; treating the mistletoe infected hemlock stands to reestablish a healthy, productive forest on 81 acres in Matrix; proper road maintenance; and culvert replacement and other aquatic/riparian efforts.	Thank you for your support.
<b>Interfor</b>	S24. Interfor recommends the Forest Service re-visit all 16 miles of roads within the project area that have been authorized to be decommissioned, but the work has not been completed, and confirm the road segments will not be needed in the future. Any road system that accesses Matrix or LSR with timber under the age	At this time, the agency has opted to not revisit the 2011 Clackamas Road Decommissioning for Habitat Restoration, Increment 2 EA. Since many roads were intentionally deferred for 10 years, it seemed premature to re-examine the decision within that period.

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	<p>of 80 should be not be decommissioned. If there is even a slight chance of future use then we recommend you return the road to the Forest Service System, just as you are planning with road 5731015.</p>	
<b>Interfor</b>	<p>S25. 4600-330. This loop road that accesses at least 6 dispersed camping sites has low maintenance costs and should remain open. We encourage the Forest Service to consider other options to reduce road maintenance costs.</p> <p>4600-350. The road that accesses Bump Lake needs brushing, grading and water bars.</p> <p>4691. The road has running water on its surface and needs simple grading and perhaps water bars. There is a side road off 4691 that access Si Lake that is in bad condition and should be evaluated.</p> <p>4670 220 and 4670-031. Access to Mt. Lowe should not be closed off. There is a great multiple peak vista from Mt. Lowe and access to popular the Rho Ridge trail. A dispersed camping spot is located at the end of 4670-031.</p>	<p>See response to comment #S4.</p>
<b>Bark</b>	<p>S26. Much of The Hunter project area was inaccessible during the first half of the public scoping period due fluctuating snow levels. Bark volunteers noted their inability to access virtually any of the proposed treatment areas during the first week of this comment period. As with several other past projects proposed on the CRRD, Bark again points out that the ability of the public to observe this proposal and provide feedback to the Forest Service was impeded by both the size of the project and the timing of the comment period.</p> <p>Bark requested copies of draft treatment area maps early in the Hunter planning process (9/23/2014) and received no direct response. During this time, the Forest Service had proposed treatment areas which they had mapped for the CSP field trips which Bark attended. The following day, Bark submitted a FOIA request for the information (9/24/2014), which still did not result in</p>	<p>Maps were provided when the proposed action was finalized. Any map prior to that point was a draft version and would have had tentative units and roads that were eventually deleted and would not have had units or roads that were identified later in the process. There will be other opportunities to provide input.</p>

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	<p>a map being shared. If we had access to the information being used by the agency at this early date, we could have field-checked the more area and provided more valuable site-specific comments during this important stage in planning. In the future, please share maps at the earliest possible date, so we can better understand where proposed actions are being planned, and how actions would affect those areas.</p>	
<p><b>Bark</b></p>	<p>S27. Consider the following <b>road recommendations</b>.</p> <p>4660140 - Reconstruct a larger berm with boulders prior to eventual decommissioning.</p> <p>4660170 - Reconstruct a larger berm with boulders prior to eventual decommissioning.</p> <p>Roads 4680124 and 4680125 are coded as likely not needed in the TAR. 4640 was meant to be decommissioned as part of the Increment 2 EA. 4650012 was meant to be decommissioned as part of the Increment 2 EA, but is coded as open on the map and likely not needed in TAR.</p> <p>4651130 - Decommission, this is NEPA ready.</p> <p>4651140 - Decommission with 130 to avoid motorized access to the wilderness.</p>	<p>See response to comment S2. Many of these roads already have NEPA decisions for decommissioning. This planning effort is not revisiting previous decisions nor is it making decisions about the timing or funding of projects with previous decisions.</p> <p>4650012 is coded as closed on the map. It was not included for decommissioning in the increment 2 EA. It accesses the power line.</p> <p>Bark has misidentified this road. 4651140 is fully within the wilderness and has been decommissioned. The road in question is 4651120. This section of road 4651120 is not already approved for decommissioning. This road will be rebermed after project completion. There has been no observed motorized incursion into the wilderness; the old roads that go into the wilderness are overgrown and blocked with large down logs. Road 4651120 is likely to be needed for future vegetation management and will be retained as a closed system road.</p>

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	<p>4660120 was decommissioned as part of increment 2 but needs a larger berm. 5731120 was decommissioned as part of increment 2 but needs a larger berm.</p> <p>4660150 was decommissioned but needs larger berm until 4660140 is eventually decommissioned.</p> <p>Rehabilitate two user created roads from 4651. Road closures need to be more secure near Wildernesses. Photos provided.</p>	<p>These roads have never been decommissioned.</p> <p>See response to comment S2.</p> <p>These two roads go to dispersed camping areas and go away from the Wilderness. The proposed action has addressed some similar issues related to unauthorized recreation use in other areas. The proposed action has been adjusted to add these two roads to the list of similar restorations that would be accomplished where funding is available.</p>
<b>Bark</b>	<p>S28. <b>Road surface as a vector for sediment.</b> The Hunter PA should include data regarding the projected increase of sediment from log haul on all roads used. If it is likely that sediment would increase from wet-weather hauling (an action which has occurred in recent projects on the CRRD) the FS should also include these projections in the PA.</p>	<p>The analysis of sediment includes road usage and haul. Depending on road surface type and proximity to streams and listed fish, hauling may or may not be restricted during rainy periods.</p>
<b>Bark</b>	<p>S29. <b>Temporary roads.</b> As in past projects, the Forest Service is planning to re-use previously decommissioned roads, and since many of these roads have been passively decommissioned, the agency will likely claim it will be achieving a net reduction in road density after the project when these roads are “rehabilitated”. Bark has long suggested that, while this approach sounds good on paper, it is not what always happens on the ground. For example, as Bark has been monitoring the implementation of the Bass &amp; Drum timber sales, we have found many roads that were not properly winterized and/or closed after the work had been complete. We request that the Hunter PA including a frank assessment of the Forest Service’s ability to ensure that “existing” roads are rehabilitated in a way that improves actual conditions on the ground. In addition, please define exactly what “rehabilitated”</p>	<p>Decommissioned roads are not included in an assessment of road density.</p> <p>The Bass and Drum projects are not yet completed, but proper winterizing was conducted during periods of inactivity.</p> <p>There is no project goal or Forest Plan requirement to change roads so that they are “improved” or are fully hydrologically recovered. Road alignments are treated to minimize erosion until they are needed again. The analysis</p>

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	means, and the timespan in which a re-built, and re-decommissioned, road becomes hydrologically recovered.	includes a definition of the suite of tools available to rehabilitate temporary roads.
<b>Bark</b>	S30. On the Hunter scoping map, there appears to be no distinction between roads that will be “rehabilitated” and will only receive “entrance management”. We request that the FS identify which roads will receive which treatment in the PA.	S. 1.2.3.2, s. 2.2.8.3, & s. 2.2.9P have the requested information.
<b>Bark</b>	S31. We feel it is important to differentiate between the scientific studies evaluating the effectiveness of road decommissioning in restoring hydrologic functions, and the Forest Service’s proposed treatments which can be more akin to road closure than decommissioning or obliteration. Decommissioning will not instantaneously eliminate the persistent impacts of roads on erosion and sediment delivery, building these roads will likely have adverse impacts to the aquatic and terrestrial environment.	The analysis includes the sediment contribution of rebuilt roads. It also accounts for the appropriate level of sediment production when various techniques are used. The effects were found to be minimal. (s. 3.3)
<b>Bark</b>	S32. Burnt Granite roadless area. 1,000-acre roadless areas have been identified across MHNH and should receive the same protections as 5,000 acre roadless areas to maximize the amount of landscape not contributing sedimentation to watersheds. Bark requests that due to the imminent and obvious change in access, forest structure, habitat, and character, this new roadbuilding be dropped from the Hunter proposal.	The analysis includes a discussion of the effects on unroaded and undeveloped areas and consideration of the option of deleting the relevant actions. (s. 3.10)
<b>Bark</b>	S33. Bark supports culvert replacement.	Thank you for your support.
<b>Bark</b>	S34. The fire-origin stands are already complex and transitioning towards natural self-thinning.  There would be unnecessary loss of snags and effects of wildlife in fire-originated stands. Although the agency admits that timber harvest has undisputed negative effects on standing dead trees, it often claims that thinning will produce more structural diversity in the future. Since large snags are required for the habitat requirements of Westside indicator species like flying squirrels and spotted owls, but are in short supply due to past and present	The Biologist has identified needs to accelerate development of key habitat features while protecting legacy trees. Most dense stands will have a phase of self-thinning. However, these stands have other objectives including the production of wood products.  The analysis includes a detailed assessment of snags (s. 3.8.7). A cooperative study with Bark and the Forest has shown the retention of most legacy snags while thinning. This showed that buffers were not needed and that many snags are not hazardous.

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	management the Forest Service should exclude stands with high snag densities (both native and plantation) from any logging and apply buffers on key snags.	
<b>Bark</b>	S35. <b>Impacts to northern flying squirrels in fire-originated stands.</b> Northern flying squirrel (principal spotted-owl prey) populations in second growth forests decline after the stands are thinned and remain at low levels. With the prescription of variable density thinning, Bark does not support this type of active management in native stands, and requests the Forest Service fully analyze an alternative that does not include logging in native forest stands.	The analysis includes a discussion of the effects of treating fire-originated stands and consideration of the option of deleting them.
<b>Bark</b>	S36. <b>Effects to northern spotted owls.</b> The ESA prohibits the Forest Service from going forward with the proposed sale without ensuring that the project will not result in jeopardy to the species. The failure to make a population-based analysis, combined with the failure to complete current surveys for listed species, creates a significant level of uncertainty regarding the level of impact that this project will have on listed species in the planning area. NEPA requires that when data is not available, an agency should recognize the lack of data and explain why obtaining it was not feasible.	The northern spotted owl recovery plan encourages active management in critical habitat to restore the species. The Forest has consulted with the U.S. Fish and Wildlife Service on this project and the levels of uncertainty are considered when devising recommendations for stand management or seasonal restrictions.
<b>Bark</b>	S37. <b>Early-seral habitat.</b> The Forest Plan does not appear to contain any deer and elk forage standards that the agency has to meet. What data does the Forest Service use that shows that deer and elk are in decline on the Forest? Or that lack of forage is harming these populations in the Clackamas drainage? There is plenty of early-seral habitat in adjacent areas that will meet the needs of these species. The Cloak EA included “big game enhancement areas”, some of which are directly adjacent to proposed Hunter Units. These areas are much smaller in size (1-5 acres) than the regeneration treatment proposed here. A more appropriate way to address the forage issue could be to reintroduce more fire back into the landscape (as the agency is with the meadow burning prescriptions in this project), which would improve deer & elk forage while also benefiting a host of other species. We encourage the agency to look to existing openings to take advantage of what	The Forest Plan addresses forage on pages Three-4, Four-3, Four-71, Four-277 and Four-278.  Recent monitoring has shown high levels of use in areas treated for forage enhancement. Wildlife specialists, including those and the Oregon Department of Fish and Wildlife have asserted that forage enhancement is important.  Meadows are relatively rare in this area. It is expected that other enhancements are needed to supplement the current early-seral habitat.

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	forage opportunities these conditions provide, including identifying additional locations for prescribed burning.	
<b>Bark</b>	S38. Bark has visited some of the frost pockets proposed for “forage maintenance and enhancement”, and found them to lack a viable conifer mix. As in other managed openings on the Forest, some of these openings have non-native plants present such as scotch broom, which the agency is presumably planning on removing. Since one of the proposed actions is to remove encroaching conifers from these areas, would this include a diameter limit? We have seen some of these meadows that include larger live conifers within them, which could provide habitat for native species for several decades if left on site. Therefore we recommend only removing small encroaching conifers (<8 in diameter).	Each forage opening has different site-specific needs and a different prescription. It may be desired to cut or burn some trees greater than 8 inches diameter to achieve the desired results.
<b>Bark</b>	S39. Bark has worked over the years to leverage public support in ending the destructive practice of clearcutting on Mt. Hood’s forests, and interprets this proposed action as a relapse to the type of traditional forestry that has led to the majority of human-caused, long-term impacts on the Forest today. We do not endorse the use of large-scale “regeneration harvest” as part of this project, and do not believe it meets the goals of enhancing deer & elk habitat.	The proposed regeneration harvest would retain 15% of the trees in skips and scattered individuals with the goal of providing early-seral habitat in the B11 – Deer and Elk Summer Range land allocation. The analysis did not find this treatment to be “destructive” or “traditional forestry” or “large-scale”.
<b>Bark</b>	S40. Mistletoe. We acknowledge and appreciate the agency’s direction to actively promote forest structure which benefits owls. However, Bark also values - and must draw attention to - the variety of ecological benefits of mistletoe such as food, cover, and nesting platforms birds and other small animals. Mistletoe has been a natural component of a healthy forest ecosystem for thousands, if not millions, of years.	The landscape will still have vast areas with light to severe mistletoe.
<b>Bark</b>	S41. In other stands Bark has seen a masticator used the treatment has required follow-up treatments in subsequent years to keep native shrubs low. The goal of this treatment is to remove sufficient hemlock and brush to reforest the stand with other species. Does the FS foresee multiple entries to the stands in order to successfully complete their work? What impact will this have on soil productivity and health?	The brush treatment is prescribed to allow the planting of non-susceptible conifer species. The trees will likely be tall enough and free to grow before the rhododendron shrub component comes back. Years ago, adjacent stands were clearcut and planted successfully that had a similar rhododendron component.

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<b>Bark</b>	S42. Unit 240 overlaps with a portion of the Burnt Granite trail #595. Bark values quiet recreation in the CRRD, and the contribution that this and other hiking trails offer the local recreation economy. How would the treatments in these stands affect this trail?	This section of trail is no longer a system trail but has been partially maintained by volunteers. In the Forest Plan, the trail was identified as ‘sensitivity level 3’, which does not require any special treatment for scenery. Volunteers may choose to clear the chips and woody debris from the trail tread.
<b>Bark</b>	S43. Because of the scientific controversy surrounding Riparian Reserve logging, and the fact that the FS has not affirmatively demonstrated the need for commercial thinning to attain ACS objectives in this project, Bark requests that the agency remove all commercial logging from Riparian Reserves unless it is demonstrated to be needed to achieve these objectives in the areas proposed.	Variable density thinning with appropriately sized stream protection buffers would protect water temperature and water quality, would provide sufficient levels of dead wood to streams and would enhance the vertical and horizontal diversity (s. 3.4.4.1). The project is consistent with the Aquatic Conservation Strategy (s. 3.4.8.1)
<b>Bark</b>	S44. Bark has several suggestions for improving the Hunter Project, and requests that the agency review these suggestions and create alternatives that meaningfully incorporate these suggestions – singly or together – to assess their economic feasibility and ecological benefit: 1. Add additional miles of road closures and decommissioning to the Hunter project listed under “System Roads In The Hunter Project Area”; 2. Rehabilitate and close unauthorized “ghost roads” referenced in these comments as part of the Hunter project; 3. Remove new roadbuilding proposed into the currently un-roaded Burnt Granite area; 4. Exclude stands with high snag densities (both native and plantation) from any logging and apply protective buffers to key snags; 5. Remove units which contain native, never-before-logged forest; 6. Remove regeneration harvest; and 7. Remove commercial logging from Riparian Reserves unless it is demonstrated to be needed to achieve ACS objectives in the areas proposed.	These suggestions are discussed in the assessment in detail both singly and together (s. 2.3).
<b>Oregon Wild</b>	S45. We do not support logging in natural stands, especially those more than 80 years old. These stands have all the building blocks	The stands are treated to enhance owl habitat. The suggestion of deleting these is considered and disclosed.

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	necessary for development into desired habitat conditions. Natural processes remain in operation to thin and diversify these stands. They do not need to be logged.	
<b>Oregon Wild</b>	S46. <b>Mistletoe</b> treatments: We do not know what the FS means by “site preparation” in the context of dwarf mistletoe treatments. Does this involve cutting large and old trees? Oregon Wild is also concerned about logging to address perceived threats from “pests” such as dwarf mistletoe, which is more appropriately considered natural species performing ecological work on the forest at no cost to the Forest Service. Mistletoe is thinning the forest, creating small canopy gaps that help diversify the understory, and helping to creating heterogeneity at both the stand and landscape scales.	The mistletoe treatments do not involve logging. They include the removal of brush and small trees to prepare the site for planting (s. 2.2.3).
<b>Oregon Wild</b>	S47. Logging <b>lodgepole</b> for “forest health” does not make sense. Lodgepole forests have their own natural cycle of growth and decline, and lodgepole forests provide different types of habitat for different types of wildlife at each stage of its lifecycle.	Lodgepole pine is not natural at this site. It was planted to provide shelter for the eventual regrowth of tree species native to the site (s. 1.3.2 & s. 2.2.2).
<b>Oregon Wild</b>	S48. <b>Unroaded areas</b> : Oregon Wild strongly opposes logging in large (>1,000 acre) unroaded areas. Carefully evaluate the ecological significance of unroaded areas.	The assessment contains an in-depth and site-specific discussion of the resources present in the unroaded blocks (s. 3.10).
<b>Oregon Wild</b>	S49. The <b>road density</b> in this landscape is too high and is unsustainable from a hydrologic perspective, from a budget perspective, and from a terrestrial wildlife corridor perspective. We strongly encourage you to incorporate significant road decommissioning into this project.	Many roads have been decommissioned and closed in the project area to reduce costs and to reduce the impacts associated with roads. The proposed action includes additional decommissioning and closure.
<b>Oregon Wild</b>	S50. Road <b>4651-120</b> is near the border of the Big Bottom Wilderness area. This road has been closed for many years. It is imperative that this road be effectively closed to any and all motorized use after thinning is completed given the sensitive habitats and past erosion on this road. This road should be decommissioned after thinning.	The end portion of road 4651120 goes into the Wilderness. It has been closed and is overgrown. The first section of the road is not in the Wilderness and is closed with a berm. See response to comment #27.
<b>Oregon Wild</b>	S51. Any logging in <b>unit 466</b> should utilize existing roads and be very light touch consistent with the protected status this area received in the 2009 Public Lands Omnibus Bill.	There is no logging associated with the enhancement of forage in unit 466.

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<b>Oregon Wild</b>	S52. Unit 102 is 98 acres and treated for “forage creation” (implying significant canopy removal). This large unit raises major concerns. What is the specific prescription for this unit?	The proposed action is a regeneration harvest with retention of 15% in skips and scattered trees (s. 2.2.5.1).
<b>Oregon Wild</b>	S53. Thinning opens the forest and creates potential access points for illegal OHV routes. Please consider this and be strategic about not helping facilitate easier access for illegal OHV routes.	Vegetation management is appropriate in these land allocations. OHV use is not authorized in this area. Berms and the use of slash to block road alignments are techniques used to minimize OHV use.
<b>Oregon Wild</b>	S54. Weigh the trade-offs associated with logging in riparian reserves. Logging does NOT increase the recruitment of functional wood, and the minor increase in very large live trees comes at great cost in terms of a significant reduction in recruitment of functional wood in medium and large size classes.	The tradeoffs associated with riparian thinning including the modeling of snags is disclosed in the analysis.
<b>Oregon Wild</b>	S55. Many science citations and recommendations were included with Oregon Wild’s comments. See Oregon Wild’s comment letter, which is available in the project record located at the Clackamas River Ranger District in Estacada, Oregon.	Those statements that relate to scientific research that are relevant to this project have been examined. The proposed action was developed with an understanding of the relevant science. The science behind thinning and forage creation is sufficiently understood and is not highly controversial based on a review of the record that shows a thorough review of relevant scientific information including that cited by Oregon Wild. These citations and recommendations were considered and incorporated where appropriate.
<b>High Cascades</b>	S56. I would like to reiterate our support for the entire project. I believe that the team of specialists on the Mt Hood National Forests did an extraordinary job of meeting the objectives of Forest Management in this project. We support active forest management to restore ecological function in both upland and riparian areas. Timber harvesting (Without diameter limits) should be used to create a mosaic of age classes and enhance stand structure to a more natural condition and create fuel breaks for fire control. We support thinning of Riparian Areas to prevent strips of heavy fuel loading. Thinning the riparian zones will enhance tree growth as well as create resiliency against Wildfires, insects and disease. Large snags can be felled as needed to create down wood while still leaving enough for shade and wildlife needs. We support	Thank you for your support.

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	<p>creating gaps for forage openings. Gaps create longer term forage for species dependent on early seral conditions, These gaps could be planted back at a wider spacing with a variety of tree species to maintain the early seral conditions for an extended time. We believe in and support actions to help improve both summer and winter range for deer and elk, including the use of regeneration harvest, especially in the Matrix lands and where appropriate in the LSR. We support management of "older" stands including the fire-originated stands, and increased harvest levels from Matrix classified lands. The harvest on matrix lands should be as high as possible per acre and also should treat as many acres as possible in order to maximize the economic benefit of the entry. This is a win/win for the forest, the mills and its employees and the counties which could potentially begin to see the benefits of having Forest Service land again.</p>	
<b>High Cascades</b>	<p>S57. We support <b>operating seasons</b> lengthened from May 1st to February 28th to provide maximum flexibility for harvest and stewardship operations. NEPA should be written for conditions based activities, instead of date based activities as the date based is inaccurate at best.</p>	<p>Project PDCs include provisions for work outside the normal operating season when conditions are sufficiently dry. They also contain some field conditions that would be indicators of sufficient dryness.</p>
<b>High Cascades</b>	<p>S58. We support <b>road closures</b>. We are not supportive of road decommissioning. Roads not needed in the near future should be closed, hydrologically stabilized, and maintained as a level 1 road. These road grades can provide access for fire control, hunting, hiking, animal foraging and future unexpected salvage opportunities.</p>	<p>The proposed road decommissioning involves roads that are not likely to be need for vegetation management in the future.</p>
<b>Bark</b>	<p>Summary of Bark's form email.</p>	<p>The following paragraphs were received a few hundred times from individuals that visited Bark's web site. The content of the Bark web page is in the analysis file with photos.</p>
<b>Bark</b>	<p>S59. I am writing about the "Hunter Integrated Resource Project", proposed in the Upper Clackamas watershed in Mt. Hood National Forest. This drainage is home to valuable <b>scenic and recreational</b> places like Austin Hot Springs, the Big Bottom wilderness area, and Rhododendron Ridge. Also within the watershed are several</p>	<p>Austin Hot Springs is on private land and would not be impacted by the proposed action. The analysis has not shown substantive impacts to scenery or recreational resources in Wilderness or at Rhododendron Ridge or to</p>

Commenter	Comment	Response
	successful native bull trout reintroduction projects, over 180 miles of road decommissioning efforts, and designated Critical Habitat for threatened northern spotted owls.	bull trout. The project is designed to enhance critical habitat for northern spotted owls.
<b>Bark</b>	S60. Do not approve commercial logging and roadbuilding in uncut and roadless forests, especially in areas in which logging would have long-term effects on wildlife like northern flying squirrels.	The project does not include any actions in roadless areas identified in the Forest Plan. The analysis shows that impacts to flying squirrels are minimal and that treatments have been designed to enhance habitat for northern spotted owls. A discussion of effects to unroaded and undeveloped areas is included in the analysis.
<b>Bark</b>	S61. I am troubled to see another timber sale that requires rebuilding previously decommissioned roads to facilitate controversial logging.	The analysis of effects from rebuilding old road alignments was found to be minimal in terms of sediment and wildlife habitats. These roads would be rehabilitated and reclosed after use.
<b>Bark</b>	S62. Furthermore, I am especially concerned to hear that the agency is planning on including “regeneration harvest” as part of this project. This term for clearcuts has never changed public opinion for an ecologically destructive practice that Oregonians have voiced their disapproval loud and clear about for decades.	The regeneration harvest is in a plantation and has the objective of providing palatable forage in a land allocation that was specifically created to provide for deer and elk. The action would retain 15% of the trees in skips and scattered individual trees. The effects analysis found the negative effects to be minimal while the benefits to early-seral dependent species are substantial.
<b>Bark</b>	S63. Please prioritize clean water, sensitive wildlife habitat, and quiet recreation in the Upper Clackamas through decommissioning roads, approving salmon restoration work, and letting natural processes and disturbance restore the landscape.	The purpose and need for this project is guided by the Forest Plan as amended. While we share some goals such as clean water, some of your other positions do not fully align with Forest goals.
<b>Oregon Wild</b>	Summary of Oregon Wild’s form email	The following paragraphs were received a few hundred times from individuals that visited Oregon Wild’s web site. The content of the Oregon Wild web page with photos is in the analysis file.
<b>Oregon Wild</b>	S64. I am writing you today to ask for your help and support in moving the Mount Hood National Forest away from controversial logging projects. I am very concerned about the massive clear cut being planned for the Clackamas River watershed in the Hunter project. I am also concerned about other parts of this project that would log in natural unroaded forests. The Forest Service has found tentative common ground with many Oregonians in thinning	See response to comments #S60 & 62

<b>Commenter</b>	<b>Comment</b>	<b>Response</b>
	plantations on our national forests. There is no common ground in 98-acre clear cuts.	
<b>Oregon Wild</b>	S65. The Clackamas River watershed should be prioritized for clean water protection, sustainable recreational opportunities, carbon storage, and wildlife – especially threatened, endangered, and rare species. Our national forests should not be prioritized for clear cuts.	See response to comment #S63
<b>Beelart</b>	S66. Thinning is worse than clearcutting. Thinning the Forest Service way leaves a jumble of waste wood that deer and elk will not enter. Except for small animals, thinning produces large deserts in the Forest. The waste wood mazes last for a decade or longer.	In most thinning treatments, a harvester machine delimits trees and crushes the limbs and tops under the equipment as it advances so that it is concentrated in paths and crushed low to the ground. While there may be some slash related impediments, deer and elk are often seen traversing through and feeding in recently thinned units.
<b>Beelart</b>	S67. It would be best to stop the Hunter Sale.	The benefits and impacts of the No-Action Alternative are disclosed.
<b>Beelart</b>	S68. A better long-term solution would be to stop logging, turn the whole District into a National Recreation Area, build two or three tourist centers, and profit from tourist dollars. Tourism will bring in more money than logging. The National Parks are full. Tourists will come to Timberline Lodge style hotels.	This action is outside the scope of this analysis; it would require Congressional action.
<b>Lindley</b>	S69. I have heard a rumor that service road NF4600-330 is to be decommissioned or closed. This is a road that has many camp sites for those who don't want to camp in camp grounds. In the last several years the roads have been closed that lots of people used for recreational purposes. If the forest service cannot maintain them, let the users take care of it. I and many of my friends and many others camp on the road throughout the summer and hunting season. This is a way of stopping people from using the forest for recreational purposes. This is cleaned up by those who care, we try to carry out more then we bring in.	See response to S4.