HUNTER INTEGRATED RESOURCE PROJECT
Appendix B Response to Comments

Scoping Summary

Commenter	Comment	Response
Clackamas Stewardship Partners (CSP)	S1. The majority of CSP members support the following: • Variable density thinning with skips and gaps in Matrix areas with the understanding that accessing additional information may alter their positions and support. • Logging in fire-originated stands as well as logging in the contiguous 2,135-acre area with no roads. • Shelterwood harvest in lodgepole plantations and replanting with native species to improve wildlife habitat and reduce forest fire risks. • Pruning western white pine trees with risk of blister rust infection. • 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. • Regeneration harvest in the 98 acres of Matrix to improve wildlife forage opportunities. Seeding with native forage species and guzzler installations. • 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. • Controlled burning to restore forage opportunities and maintain riparian habitat. • 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.	Thank you for your support. See response to comment C60.

	• Removal of dangerous trees along Forest Service roads and their use for instream restoration projects and for firewood when appropriate. • 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. • Culvert replacement projects. • Dispersed recreation rehabilitation.	
CSP	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.	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. New berms would be installed upon completion of project activities, and even though they will be robust, based on past experience, there is still a chance that an unauthorized user could breach a berm by pioneering a route going around it. While a bigger berm will deter some, it is not likely to deter all unauthorized users. The Forest intends to prohibit access; however, it is also prudent to acknowledge that unauthorized use may occur. Existing road closures that have been breached are being addressed using the adaptive management process tied to the NEPA documents that authorized the closure. On some, a robust berm will likely be considered adequate and on others more intensive work may occur using techniques such as imported root wads and slash. These will be dealt with using retained receipts funding where appropriate. New NEPA documentation is not needed to deal with closures that were authorized by other decisions.

CSP	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.	These roads are included in other NEPA decisions for decommissioning or closure. This planning effort is not revisiting the previous decisions.
CSP	S4. 4600-330. This loop road that accesses at least 6 dispersed camping sites has low maintenance costs and should remain open. CSP members encourage the Forest Service to consider other options to reduce road maintenance costs. 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. There is a side road off 4691 (4691-120) that access Si Lake that is in bad condition and should be evaluated. 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.	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 would occur with the Hunter project. This road makes sense to leave open even though there is limited long-term funding to maintain it. These roads are included in a retained receipts proposal. This type of road maintenance does not need to be included in the Hunter EA. Thank you for this information; this has been added to the proposed action. 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.
CSP	S5. CSP supports the use of stewardship contracting 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.	Thank you for your support of stewardship contracting.
CSP	S6. Bark submitted a "minority" letter using the CSP letterhead.	The comments in this letter are fully duplicated by Bark's scoping letter reply below.

Oregon Hunters Association Pioneer Chapter	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. 4600-350. The road that accesses Bump Lake needs brushing, grading and water bars. 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. 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.	See response to comment S4.
AFRC	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.	Thank you for your support.
AFRC	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,	There will be a purpose and need statement that addresses this.

	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 this infrastructure is important to ensure that the Forest will continue to have needed tools for forest management.	
AFRC	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.
AFRC	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.

AFRC	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.
AFRC	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.
AFRC	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.
AFRC	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.
AFRC	S16. This project will also provide a good opportunity to conduct some aquatic/riparian improvements including the replacement of	Thank you for your support.

	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.	
AFRC	S17. AFRC supports the Forest Service's use of an Environmental Assessment on this project.	Thank you for your support.
Interfor	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. 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.	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.
Interfor	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.	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.
Interfor	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 Cl 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.	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

	Interfor suggests the application of regeneration harvest and the associated economic and environmental analysis on Cl Timber Emphasis land be far superior to the equivalent associated with variable density thinning. Interfor requests the Forest Service to clarify why prescriptions that generate more harvest volume/acre and correlated revenue aren't being utilized.	vegetation manipulations to achieve the goals of the Forest Plan as amended. See response to comment C60.
Interfor	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.
Interfor	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.
Interfor	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.
Interfor	S24. Interfor recommends the Forest Service re-visit all 16 miles of roads within the project area that have been authorized to be	At this time, the agency has opted to not revisit the 2011 Clackamas Road Decommissioning for Habitat

	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 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.	Restoration, Increment 2 EA. Since many roads were intentionally deferred for 10 years, it seemed premature to re-examine the decision within that period.
Interfor	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. 4600-350. The road that accesses Bump Lake needs brushing, grading and water bars. 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. 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.	See response to comment S4.
Bark	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. 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	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.

	which Bark attended. The following day, Bark submitted a FOIA request for the information (9/24/2014), which still did not result in 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.	
Bark	S27. Consider the following road recommendations. 4660140 - Reconstruct a larger berm with boulders prior to eventual decommissioning. 4660170 - Reconstruct a larger berm with boulders prior to eventual decommissioning. 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. 4651130 - Decommission, this is NEPA ready. 4651140 - Decommission with 130 to avoid motorized access to the wilderness.	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. 4650012 is coded as closed on the map. It was not included for decommissioning in the increment 2 EA. It accesses the power line. 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.

	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. 4660150 was decommissioned but needs larger berm until 4660140 is eventually decommissioned. Rehabilitate two user created roads from 4651. Road closures need to be more secure near Wildernesses. Photos provided.	These roads have never been decommissioned. See response to comment S2. 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.
Bark	S28. Road surface as a vector for sediment. 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.	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.
Bark	S29. Temporary roads. 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 & 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" means, and the timespan in which a re-built, and re-decommissioned, road becomes hydrologically recovered.	Decommissioned roads are not included in an assessment of road density. The Bass and Drum projects are not yet completed, but proper winterizing was conducted during periods of inactivity. 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 includes a definition of the suite of tools available to rehabilitate temporary roads.

Bark	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.
Bark	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)
Bark	S32. Burnt Granite roadless area. 1,000-acre roadless areas have been identified across MHNF 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)
Bark	S33. Bark supports culvert replacement.	Thank you for your support.
Bark	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 management the Forest Service should exclude stands with high snag densities (both native and plantation) from any logging and apply buffers on key snags.	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.

Bark	S35. Impacts to northern flying squirrels in fire-originated stands. 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.
Bark	S36. Effects to northern spotted owls. 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.
Bark	S37. Early-seral habitat. 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 forage opportunities these conditions provide, including identifying additional locations for prescribed burning.	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.
Bark	S38. Bark has visited some of the frost pockets proposed for "forage maintenance and enhancement", and found them to lack a	Each forage opening has different site-specific needs and a different prescription. It may be desired to cut or burn

	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).	some trees greater than 8 inches diameter to achieve the desired results.
Bark	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 found the proposal to be appropriate to provide needed forage and to move the landscape in a desired direction.
Bark	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.
Bark	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.
Bark	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.
Bark	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)
Bark	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).
Oregon Wild	S45. We do not support logging in natural stands, especially those more than 80 years old. These stands have all the building blocks 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.	The stands are treated to enhance owl habitat. The suggestion of deleting these is considered and disclosed.

Oregon Wild	S46. Mistletoe 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).
Oregon Wild	S47. Logging lodgepole 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).
Oregon Wild	S48. Unroaded areas: 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).
Oregon Wild	S49. The road density 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.
Oregon Wild	S50. Road 4651-120 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 S27.
Oregon Wild	S51. Any logging in unit 466 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.
Oregon Wild	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?	See response to comment C60.
Oregon Wild	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.
Oregon Wild	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.
Oregon Wild	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.
High Cascades	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 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	Thank you for your support.

	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.	
High Cascades	S57. We support operating seasons 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.	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.
High Cascades	S58. We support road closures. 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.	The proposed road decommissioning involves roads that are not likely to be need for vegetation management in the future.
Bark	Summary of Bark's form email.	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.
Bark	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 scenic and recreational places like Austin Hot Springs, the Big Bottom wilderness area, and Rhododendron Ridge. Also within the watershed are several successful native bull trout reintroduction projects, over 180 miles of road decommissioning efforts, and designated Critical Habitat for threatened northern spotted owls.	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 bull trout. The project is designed to enhance critical habitat for northern spotted owls.
Bark	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.
Bark	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.
Bark	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.
Bark	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.
Oregon Wild	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.
Oregon Wild	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 plantations on our national forests. There is no common ground in 98-acre clear cuts.	See responses to comments S60, S62 & C60
Oregon Wild	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

Beelart	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 delimbs 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.
Beelart	S67. It would be best to stop the Hunter Sale.	The benefits and impacts of the No-Action Alternative are disclosed.
Beelart	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.
Lindley	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.

30-day Comment Period Summary

Commenter	Comment	Response
Clackamas Stewardship Partners (CSP)	C1. We support carefully pursuing management activities that focus on retaining existing structural complexity, habitat for fish and wildlife, and soil integrity, with an emphasis on riparian areas and pockets of minor tree species and plants.	Thank you for your support.
CSP	C2. We support addressing illegal user-created trails and road closure breaches within the Hunter project area through obliteration of illegal trails, and reinforcement of existing closures to prohibit additional entries by motorized vehicles during and after project implementation. We would like the USFS to discourage unauthorized motorized access and use via project design criteria and/or the timber sale contract.	See responses to comments S2 & S3. Reinforcing existing road closures does not require new NEPA analysis. The District, in cooperation with CSP, will continue to pursue an allocation of retained receipts funding to reinforce existing closures. The user created OHV trail was identified during project planning. It occurs on an existing skid trail. If the trail is used during logging operations, it will be rehabilitated as other skid trails. If that work is not sufficient to block OHV use, KV funds would be used to create sufficient blockage.
CSP	C3. Fire-originated Stands: Most CSP members are comfortable logging in fire-originated stands as well as logging in the unroaded area at Burnt Granite. Bark is concerned about this action negatively impacting structural diversity and habitat within these stands as well as new temporary road construction in the Burnt Granite area.	See response to S32 & S34.
CSP	C4. Forage Opening and Early Seral Habitat (Unit 102): Most CSP members support the proposed regeneration harvest in unit 102 to improve wildlife forage and provide early seral habitat. Bark is concerned about the size and prescription for unit 102.	See response to S39.
AFRC	C5. Thank you for adding the support of local infrastructure to your purpose and need statement.	See section 1.3.1.4.
AFRC	C6. Over the past several years many Forest Service projects have been scaled back in scope to a reduced level of acres treated due to perceived effects to the northern spotted owl, including thinning treatments designed to improve owl habitat. We encourage the Mt. Hood to consider a recently published study conducted by NCASI when assessing treatment areas and their potential affects to owls.	See response to comment S11. All of the stands identified as appropriate for thinning are included and none were eliminated or scaled back based on canopy cover. The project has some treatments such as forage creation and power line treatments that are included regardless of the density of the canopy before or after treatment.

Commenter	Comment	Response
	Larry L. Irwin, Dennis F. Rock, Suzanne C. Rock, Craig Loehle, Paul Van Deusen. 2015. Forest ecosystem restoration: Initial response of spotted owls to partial harvesting Among other findings, this study concluded that partial-harvest forestry, primarily commercial thinning, has the potential to improve foraging habitats for spotted owls. The treatments being proposed will likely affect northern spotted owl (NSO) habitat to some degree. Often this level of effect is quantified by the amount of forest canopy that remains following thinning treatments. AFRC has general concerns with how the Forest has been measuring these effects to NSO habitat, specifically regarding canopy cover/closure. AFRC included an attachment outlining the difference between these measures that advocates for the use of canopy closure.	The Irwin paper confirms the Hunter analysis that the proposed variable density thinning would be beneficial to spotted owls. The confusion in some of the literature about canopy cover and canopy closure is outside the scope of this analysis. The Hunter EA, the Letter of Concurrence with the U.S. Fish and Wildlife Service, and the Critical Habitat rule use the concept of canopy cover as one metric for analysis. Many other factors and site-specific conditions are considered by the local biologist including down wood, prey base, aspect and slope. In thinning units, it was estimated that the average canopy cover would be approximately 40% over all, with some areas such as gaps and heavy thins being below that while other areas including skips and riparian protection buffers would be greater.
AFRC	C7. We find little change in your proposed acreage treatments from scoping to the preliminary assessment. With over 95,000 acres analyzed, AFRC is concerned that you have chosen to only mechanically treat 2,304 acres or 2.6% of the project area. AFRC believes there are significantly more acres that you could treat during this entry.	See responses to comments S10 and S18. The assembly of plantations into a project for thinning is sometimes subjective. The timing of when it is silviculturally and economically appropriate to thin a plantation is a fairly wide window of opportunity. The stands that are not included now will not be deferred forever but for several years until they can be packaged in a subsequent proposal when their stage of development makes thinning appropriate.
AFRC	C8. We are disappointed that you plan to only harvest 260 acres in the fire originated stands, choosing instead to do thinnings and leave all of the larger trees. As pointed out by some of AFRC's members, the older trees provide a product that their mills can utilize that are not provided by trees that are only of commercial thinning size. AFRC believes that you completely ignored those comments and needs put forth by our members.	See response to comment S11. The fire-origin stands are in critical habitat for spotted owls. The retention of scattered legacy trees while thinning is an important element of their transition to better, more diverse owl habitat. The purpose and need for this project at s. 1.3 focuses on thinning and other stand management that involve removing relatively small trees. Logging in mature stands is not proposed at this time.

Commenter	Comment	Response
AFRC	C9. We appreciate that the Forest decided to do a complete removal of merchantable timber within the utility line corridor. This was the best option for safety and economics in treating these stands.	Thank you for your support.
AFRC	C10. We appreciate the Forest taking our suggestion of removing danger trees from a total of 296 acres. This will make the roads with the project area safer, and will also provide a product for our manufacturers.	Thank you for your support.
AFRC	C11. There are 6,799 acres of combined deer and elk summer and winter range, however, your preferred alternative is only treating 224 acres specifically for creating early seral habitat, maintaining forage openings for deer and elk, and enhancing forage for deer and elk. With populations of black tail deer and Roosevelt elk on a steep decline, AFRC believes that the Forest should be doing many more acres of regeneration harvests with the specific goal of improving early seral habitat for deer and elk.	See responses to comments S14 and S21. The agency recognizes the need for forage. However, there are limited places where the appropriate palatable plant indicators are present and that limits our ability to create quality forage.
AFRC	C12. A number of streams and drainages are present in the planning area and AFRC strongly encourages the Forest to enter into the riparian areas to remove some of the fuel loading and cover. Recent large wildfires have shown that some of the most severe burns and resource damage have occurred in the riparian areas where the fuel loads are the highest. Creating openings in the riparian areas also allows more sunlight to enter which can enhance other vegetation and insect production for a variety of species that depend on them for food. AFRC also referenced some recent research that should be considered to support active riparian management.	The proposed treatments in Riparian Reserves were guided by recent science and the desire to have cool stream temperatures, adequate wood recruitment, and the development of diverse stand structures. The proposed riparian treatments were included when consulting with the National Marine Fisheries Service and they concurred with us that the project would not likely adversely affect listed fish.
Interfor	C13. The Forest Service is proposing treatment on only 1,480 acres of Matrix Cl Timber Emphasis, while there are 48,590 acres of Matrix in the planning area (25,334 classified as Cl Timber Emphasis). Similarly treating only 400 of the 24,759 acres of LSR. Interfor believes the Forest is missing opportunities to harvest more acres in this planning phase than what is being proposed.	See responses to comments S10, S11 & S18.
Interfor	C14. Section 1.2.2 describes the planning area to contain 30,533 (32%) acres of previously converted plantations with only 6%	The C1 standards and guidelines including C1-031 only apply to the C1 Timber Emphasis land allocation, not the

Commenter	Comment	Response
	having been thinned in the past 20 years. Only 8% of the plantations are included for treatment in the proposed action. Interfor recommends The Forest Service refer to the Land and Resource Management Plan page Four-293 line Cl-031 which states:" Vegetation in plantations should be managed for optimum return on investment." Interfor recommends the Forest Service ensure that regeneration harvest is applied in plantations in order to achieve the optimum return on investment.	entire 30,533 acres of plantations described. There are also dozens of other standards and guidelines for the C1 land allocation, and hundreds of others that apply Forest-wide that must be considered and balanced when planning a project. Most of the C1 land allocation in the project area is also overlapped by spotted owl Critical Habitat that has a bearing on the prescription options for plantations.
Interfor	C15. Forage is a limiting factor on the Forest. The plan proposes to create one 98 acre regeneration harvest, repair/maintain 115 acres of existing openings, and prescribe burn 11 acres, for a total of 224 acres across entire planning area (0.2%). Interfor believes the Forest is missing opportunities to provide additional early seral stage habitat. With the elk and deer being indicator species for early seral habitat, Interfor recommends increasing the pace and scale of creating early seral habitat through harvest.	Thank you for your support of forage creation. See responses to comments S14, S21, C11 & C60.
Interfor	C16. Interfor encourages the Forest Service to consider regeneration harvest, and deep soil tillage on units with greater than 15% compaction. The PA describes many of the units as over the 15% threshold without any action. Regeneration harvest and deep soil tillage would restore the productive capacity of the soil. Deep soil tillage cannot be used thinning prescriptions because of potential root damage of residual trees.	While a number of plantations exceed 15% detrimental soil condition, stand exams show that they continue to grow well. These stands are not near culmination of mean annual increment and are not at a point where regeneration would be contemplated solely for the purposes of timber productivity. Compaction is not the only soil impact: many units are above 15% due to soil displacement or intense burning and these factors would not be changed by tillage.
Interfor	C17. Interfor recommends the Forest Service treat all LSR designated stands between the ages of 50-80 years of age in addition to the already identified acreage in the PA. LSR designated stands cannot have timber harvest beyond 80 years of age. It has been scientifically proven that thinning accelerates the stand characteristics associated with late seral habitat. The planning window for re-entry is not stated in the PA. It would be prudent to treat the LSR acres closest to reaching 80 years of age in order to implement the mandate of the Northwest Forest Plan.	All of the LSR plantations that are viable and appropriate for thinning have been included.

Commenter	Comment	Response
Interfor	C18. Interfor would like to remind the Forest Service of the variable costs associated with different logging prescriptions. The costs increase dramatically starting with ground based, then skyline, and finally helicopter harvest methods. Unnecessarily high cost logging prescriptions could jeopardize the economic viability of the project. Additionally, production is a direct influence on cost. Removing harvest units and/or reducing volume per acre removal targets drastically increases harvest cost.	Thank you for this reminder. We believe the mix of logging systems and other costs would result in viable contracts.
Interfor	C19. Interfor strongly recommends the deletion of temperature reference in K3 (page 58). As written, no haul would occur when temperatures are between 28 and 38 degrees Fahrenheit. If the USFS cannot exclude this language, we recommend it is modified to clarify language regarding freeze/thaw and utilization of on-the-ground monitoring measures. Interfor reminds the Forest Service that increased restrictions on timber harvest and haul create more constraints directly increasing harvest cost and lowering the return to the government or retained receipts.	K3 has been edited to add clarification. The temperatures are one way to know when freeze-thaw issues are likely to occur but other field observations are important to protect roads. There have been many studies on the negative effects of road use during freeze-thaw conditions on road surfaces, bases and subgrades.
Interfor	C20. Interfor commends the Forest Service for thinning in the upland portion of Riparian Reserves. Considering the lack of horizontal and vertical diversity in many of the plantations, mimicking natural disturbance via thinning and log placement in streams and the inner zone is a positive step that has been overlooked in previous assessments.	Thank you for your support.
Interfor	C21. Interfor commends the Forest Service in addressing the challenges associated with illegal OHV use in the planning area. The PA discusses aspects of managing OHV use, but leaves the on-the-ground implementation to the contract language.	Thank you for your support.
Oregon Wild	C22. The PA (p 149) says "Three of the stands have a large number of live and dead legacy trees." The Forest Service needs to disclose which units these are and give them more scrutiny. Even if those legacy trees are not targeted for logging, there is a significant risk that they will be felled as hazard trees. These trees will be safest if the FS just keeps worker out of the stands. Where legacy trees are scattered in other stands, the FS should keep workers out of the hazard zone around those trees.	See response to comment S34. Legacies will be protected to the extent possible while achieving the goals of enhancing spotted owl habitat and providing wood products. The three units referenced by the biologist include units 203, 204 and 206.

Commenter	Comment	Response
Oregon Wild	C23. The Forest should delete units in unroaded areas.	See responses to comments S32 & S48. The analysis of impacts to unroaded and undeveloped blocks is included at s. 3.10. The consideration of this option is discussed at s. 2.3.1.3.
Oregon Wild	C24. Logging will make a bad situation worse for snag habitat.	See response to comment S34. Section 3.8.7 discloses impacts to snags. The Forest is managed for many resource goals, objectives and uses. The analysis found that the proposed action was appropriate to move the landscape in desired directions while providing sufficient snags.
Oregon Wild	C25. The project will degrade spotted owl habitat, exacerbate competitive interactions between spotted owls and barred owls, and the there is significant new information about spotted owls.	The analysis considered the current science related to spotted owls. After consulting with the U.S. Fish and Wildlife Service, they concurred that the project would not likely adversely affect spotted owls. The prescription for thinning units would retain dispersal habitat characteristics.
Oregon Wild	C26. There is significant new information that undermines the agencies LRMP land allocations that emphasize logging. Several significant new developments indicate a need to increase emphasis on conservation and restoration of more mature & old-growth forests, and reduced emphasis on Matrix objectives such as timber production from logging of mature & old-growth forests.	The Mt. Hood Land and Resource Management Plan was amended by the Northwest Forest Plan. The Forest now has land allocations including Late-Successional Reserves and Riparian Reserves, which have the goal of maintaining and restoring late-successional characteristics. The Hunter project does not contain an emphasis on timber production from mature and old-growth stands. Fire-origin stands are being treated to enhance spotted owl habitat characteristics.
Oregon Wild	C27. The agency must carefully explain why they think it's OK to thin stands over 80 years old in riparian reserves but not in LSRs when the goals are similar.	See responses to comments S43 & S54. LSR standards and guidelines expressly prohibit logging in stands over 80 years of age, while Riparian Reserves standards and guidelines have no similar age limit. The Riparian Reserve stands do not have late-successional characteristics and the proposed action is designed to move stands toward desired conditions.
Oregon Wild	C28. Thinning in the Matrix must be restorative and variable.	The proposed action includes variable-density thinning in the Matrix, (section 2.2.1).

Commenter	Comment	Response
Oregon Wild	C29. We urge the agency to recognize that road density is already too high and that road construction, even if we call the roads "temporary," has long-term impacts.	Temporary roads and the use of existing road alignments are discussed at s. 1.6.1.4 and 2.2.8.2. Road density in the project area has been dramatically reduced in recent years due to the decommissioning of system roads.
Rocky Mountain Elk Foundation (RMEF)	C30. We would like to take this opportunity to support the Proposed Action. It is clear the Forest Service recognizes the effect that the decline of early seral vegetation is having on deer and elk habitat in the project area. The Hunter Integrated Resource project was developed in part to address this lack of early seral habitat as well as the lack of quality forage in the area.	Thank you for your support.
RMEF	C31. Deer and elk are but two species of more than 150 native wildlife species habituated to the early seral vegetation type. If deer and elk populations are declining in the planning area it is highly likely that the other early seral obligates are also in serious decline. It stands to reason that restoring the early seral vegetation type will improve the situation for many more species than deer and elk.	We concur. A discussion of deer and elk as Management Indicator Species is at section 3.8.2.
RMEF	C32. We support the use of variable-density thinning with skips and gaps and suggest thinning down to a 35% crown closure to allow more light to reach the forest floor to establish early seral vegetative species.	The project will include gaps and heavy thins dispersed within the thinning units. The average canopy cover would be approximately 40% over all, with some areas such as gaps and heavy thins being below that while other areas including skips and riparian protection buffers would be greater.
RMEF	C33. The gaps that are created in this project area should be at least two acres in size. Gaps closer to five acres in size would be better in providing for quality forage for the most number of years as possible. The height of trees adjacent to gaps must be considered when creating these gaps. When taller trees are found adjacent to gaps it is important to have larger gaps to allow adequate sun light to get to the ground.	While some created forage areas are larger, gaps in thinning units are limited to three acres for this project because that is what is specified in the spotted owl letter of concurrence to retain the units in as dispersal habitat.
RMEF	C34. We support the regeneration harvest in the 98 acres B11-Deer and Elk Summer Range. This will go a long way in providing forage for deer and elk in an area where it has been declining for close to 20 years. We support your planned maintenance of 18 forage openings for deer and elk totaling 115 acres of early seral	Thank you for your support. See response to comment C60.

Commenter	Comment	Response
	habitat. We support the burning of the 11-acre Rhododendron Meadow to rejuvenate forage found in the meadow.	
RMEF	C35. We note the project plans to maintain and repair 148 miles of roads. This maintenance work will reduce the risk of sedimentation getting into streams in the area as well as providing better access for fishing, hunting and other recreation activities. We would suggest seeding a mix of grasses and forbs preferred by deer and elk on roads proposed for decommissioning or closure. This action will turn these roads into linear wildlife meadows. We suggest that all disturbed soil, lands, skid tails, yarding corridors, be seeded with a mix of grasses and forbs preferred by deer and elk. This will also increase the wildlife forage base.	The project requires the use of native species for forage and erosion control. Efforts are underway to propagate a sufficient supply of seed of the most palatable native varieties including Idaho fescue and California brome.
WildEarth Guardians	C36. We are very encouraged to see Mt. Hood National Forest taking efforts to improve the forest health in the project area, enhance forage for deer and elk, and reduce resource risks and maintenance costs while providing appropriate and safe access to the forest.	Thank you for your support.
WildEarth Guardians	C37. The Forest Service should consider efforts to create a resilient future road system. We urge the agency to adopt a thoughtful, strategic approach to improving public access to the forest, reducing negative impacts from forest roads to water quality and aquatic habitats, and improving watersheds and forest resiliency that is in line with Mt. Hood's long-term funding expectations.	Section 1.3.8.2 describes the Transportation Analysis Report (TAR) and how the current project plan works with that plan. The analysis incorporates site-specific project level information.
WildEarth Guardians	C38. As part of its analysis of this project under NEPA, the Forest Service must consider Mt. Hood's travel analysis report, identify the minimum road system, and identify unneeded roads to prioritize for decommissioning or other uses. The PA references Mt. Hood's 2015 travel analysis report, which is a great start to assessing the road system within the project area. Even more important, however, is the next step under subpart A: The Forest Service must consider the recommendations from the travel analysis report to identify the minimum road system and identify unneeded roads for decommissioning.	The Hunter project included a detailed analysis of every road in the project area. Tables showing this information are in the analysis file. Unneeded roads have been proposed for decommissioning.
WildEarth Guardians	C39. The current analysis fails to discuss the need for a minimum road system, much less assess what the minimum road system for	The project does move the area toward a minimum road system. The roads that were retained on the system were

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	the project area might look like or whether the proposed road related actions work towards that minimum road system. To the extent that the final decision in this project differs from what is recommended in the travel analysis report, the Forest Service must explain that inconsistency.	found to be needed for forest management. Based on site-specific analysis and public involvement, some roads that were identified as not likely needed in the TAR were found to be needed, and some roads that were identified as likely needed were found to not be needed. These are summarized at section 3.11.3.3.
WildEarth Guardians	C40. The Forest Service provides various tables related to road actions within the project area. But the agency lists road decommissioning, road closures, and repairs not related to haul at a different section. This information should be provided in one location to allow for meaningful public comment. The table should include the factors that define a minimum road system.	The tables were stratified that way to show the roads needed for Hunter haul separate from road changes for roads not needed for Hunter haul. Many more roads with no treatment or change do not show on either table. The analysis file contains tables that show all of the roads.
WildEarth Guardians	C41. The Forest Service should explain how many of the 189 miles were actually physically decommissioned. And it should make clear that the prior decisions establish the baseline for this project. But the way the Forest Service presents its previous work on roads in the PA, it appears to claim credit for prior, unrelated decisions. This presents a false starting point and is likely to confuse the public, precluding meaningful comment. Ultimately the current road system is the existing condition within the project area: 300 miles of system roads on the landscape.	There is no intention to take credit for previous decisions. The intention was to disclose the existing condition, which includes existing system roads and decommissioned roads. Within the project area, 189 miles have been decommissioned using a suite of practices site-specifically designed for each road. The transportation system database does not include the details for each road.
WildEarth Guardians	C42. Based on current natural resource conditions, assessed risks from the existing road network, the agency's limited resources, and long-term funding expectations, and the stated purpose of providing an appropriate road system that is safe, affordable, and minimizes impacts to resources, additional road decommissioning is warranted.	The analysis found 1.6 miles of roads to decommission. The highest risk roads have already been decommissioned and lower risk roads have been closed. Long-term sustained forest management in the project area is expected to provide sufficient value to repair and maintain roads.
WildEarth Guardians	C43. The Forest Service should clearly articulate the statement of purpose to include its duty to identify the minimum road system and unneeded roads for decommissioning, and provide support for the claimed need.	The purpose and need is articulated at s. 1.3.8.
WildEarth Guardians	C44. The best available science shows that roads cause significant adverse impacts to National Forest resources.	A similar disclosure can be found at section 3.3.3.3. The analysis describes a trend of stable and improving watershed conditions (s. 3.3.4).

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WildEarth Guardians	C45. The Forest Service admits that berms put in place to close certain roads within the project area have been breached. Because the closures have proven ineffective, the Forest Service must address those impacts as well as the likely ineffectiveness of using these same measures to close the 24 miles of roads proposed under this project.	Past road closures on flat ground have been breached. New road closure proposals considered the side slope of the berm or gate location and where ground was determined to be flat and breachable, the entrance management technique was proposed to block the first 1/8 mile, (s. 2.2.8.6). This technique has proven successful in the past. Existing road closures that have been breached are being addressed using the adaptive management process tied to the NEPA documents that authorized the closure. On some, a robust berm will likely be considered adequate and on others more intensive work may occur using techniques such as imported root wads and slash. These will be dealt with using retained receipts funding where appropriate. New NEPA is not needed to deal with closures that were authorized by other decisions.
WildEarth Guardians	C46. Climate change is expected to lead to more extreme weather events, resulting in increased flood severity, more frequent landslides, altered hydrographs, and changes in erosion and sedimentation rates and delivery processes. Many National Forest roads are poorly located and designed to be temporarily on the landscape, making them particularly vulnerable to these climate alterations.	Previous road decommissioning EAs have already taken care of the roads that had highest aquatic risk. The proposed action will include road repairs and upgrades of culverts to meet current standards for passage of floodwaters.
WildEarth Guardians	C47. Bark suggested seven possible alternatives to review separately or together. The Forest Service should have considered these alternatives in depth separately, or provided reasoning for not considering them in depth. In particular, the Forest Service should consider the suggested alternative to add more road decommissioning and closures.	Bark's suggested alternatives were considered (s. 2.3.1). The roads discussed by Bark were already authorized for decommissioning in previous EAs. Those decisions remain valid and previous decisions are not being revisited.
WildEarth Guardians	C48. The Forest Service should also consider an alternative that removes new roadbuilding into the unroaded Burnt Granite area. It is very important that roadless area characteristics be maintained.	See responses to comments S32, S48, S60 & C23. That alternative was considered.
WildEarth Guardians	C49. Ensure compliance with the Clean Water Act.	Compliance with the Clean Water Act is discussed at s. 3.3.3
WildEarth Guardians	C50. Ensure compliance with the Endangered Species Act.	Northern spotted owls are addressed at s. 3.7. Impacts have been disclosed, the project would not likely adversely

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		affect owls. Listed fish are addressed at s. 3.4. Impacts have been disclosed, the project would not likely adversely affect listed fish.
Bark	C51. "Fire-originated" stands - Logging in previously "unmanaged" forest stands is being proposed. Bark has visited these native stands and found that tree species, as well as ages and sizes, vary and that legacy trees are common. This differs significantly from what the PA described as "trees of mostly the same age class and with a single canopy layer." Bark believes that the best way for the FS to ensure that there is an overall increase of high quality old growth forest habitat in the future is to let mature native forests grow unmanaged. We have visited the Fire Origin units and can find no immediate "forest health" crisis that requires active and heavy-handed managing these ecosystems in order to create less-ecologically valuable thinned stands which resemble stands largely surrounding these units. Bark recommends that the agency pursue an action alternative that excludes commercial logging within native forests.	See responses to comments S34 & S35. The Forest has consulted with the U.S. Fish and Wildlife Service on this project and they concurred that the project was appropriate and would not likely adversely affect spotted owls.
Bark	C52. Effects to northern spotted owls - Several of the proposed units have a multi-storied structure, large diameter trees and are close to having appropriate levels of snags and down wood required for NSO habitat. The proposed project would adversely modify this future owl habitat by reducing the forest canopy well below 60% and remove down wood, shrubs and snags, which provide habitat for important prey species. In addition to the ESA's prohibition on destruction or adverse modification of Critical Habitat, the rule that designated this section of the forest as Critical Habitat determined that all of the unoccupied and likely occupied areas in this subunit are essential for the conservation of the species to meet the recovery criterion that calls for the continued maintenance and recruitment of northern spotted owl habitat. Increasing and enhancing northern spotted owl habitat is necessary to provide for viable populations of northern spotted owls over the long term by providing for population growth, successful dispersal, and buffering from competition with the barred owl.	See response to comment C51. During initial project planning, the biologist eliminated units that provided suitable owl habitat and developed prescriptions for fire-origin stands in Critical Habitat that would move the stands toward desired conditions. The northern spotted owl recovery plan encourages active management in critical habitat to restore the species.

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Bark	C53. The Watershed Analysis includes the key recommendation of "Harvest outside of owl home range." WA at 61. The document goes on to predict that "(w)ithin 10 to 20 years conceivably at least seventeen of the Matrix owls could be subject to take. This could potentially affect 37% of the current owl population in the watershed." WA at 48. We asked the question in scoping: where are we at now in terms of owls already taken in the Hunter project area?	Bark is misrepresenting this recommendation. The list on page 61 is intended to prioritize potential harvest, and "thinning in natural second-growth stands" is the second priority after thinning in plantations. Only the removal of suitable habitat within owl home ranges would result in take, and the current Hunter proposal does not include any actions in suitable habitat. The recommendation of the Watershed Analysis to do regeneration harvest in mature and old-growth stands has not occurred to the extent estimated at that time and none has occurred in more than 15 years.
Bark	C54. Impacts to northern flying squirrels - According to agency cited research, thinning stands within Hunter could reduce the suitability of the site for the northern flying squirrels for 30 to as much as 100 years. Northern flying squirrel (a principle spotted-owl prey) populations in mature and second growth forests decline after the stands are thinned and remain at low levels. Research has found that squirrel populations in un-thinned patches are larger than the thinned, and even those decline after adjacent areas are thinned.	See response to S35. The EA discusses flying squirrels at s. 3.7.3.2.
Bark	C55. Increased interactions with barred owls - The owl's Revised Recovery Plan identifies competition from the barred owl as an important threat to the spotted owl. Recent project analyses have made no or little mention of combined impacts of logging with the known effects of competition and trophic cascades associated with the barred owl.	See response to comment C25. Barred owls are discussed in the EA at s. 3.7.2 & s. 3.7.3.2.
Bark	C56. Impacts of road construction - Northern spotted owls on average create an avoidance buffer of 1,312 feet from forest roads. If the owls have a more than 1,000 foot avoidance buffer from roads, how will the logging operations affect their use of the area? And, while Bark knows the FS deems these roads temporary, they will have, at the least, an impact during operations and likely longer. The full impact of these roads, and their use, on owls must be assessed.	Disturbance to owls is discussed in the EA at s. 3.7.2 & s. 3.7.3.2.

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Bark	C57. We have visited several of the frost pockets proposed for "forage maintenance and enhancement" and found they vary in size, plant mix and structure. Some of these units overlap land allocations Wild and Scenic River, Late Successional Reserve, and Riparian Reserve. Please make clear in your analysis how maintaining these openings using the methods described is consistent with the desired conditions of these land allocations.	See response to comment S38. No logging is proposed for these forage units (units 414 to 466). These land allocations allow for management of existing forage. For example, in LSRs, activities that are neutral or beneficial are allowed (Northwest Forest Plan p. C16). In Riparian Reserves, wildlife habitat restoration and enhancement activates are allowed where consistent with the Aquatic Conservation Strategy (Northwest Forest Plan p. C-37). The analysis found that these forage treatments would protect the outstandingly remarkable values associated with the Wild and Scenic River (EA s. 3.9.11).
Bark	C58. Some of these openings already have non-native plants present such as scotch broom, oxeye-daisy, and tansy ragwort. When we asked the FS during scoping whether these prescriptions would include use of herbicides to remove these plants, the reply we received was that herbicide use was "not included in the proposed action" at that time. Now herbicide spraying of oxeye daisy in forage unit 416a is "likely to occur". Please specify in the Decision which herbicides would be used.	There is no record that Bark raised this issue during scoping. The use of herbicide is discussed as a foreseeable project in the EA at s. 3.13.4. It was included for the purpose of cumulative effects analysis. The herbicide use is not part of the proposed action for this project but is project covered by the 2008 Record of Decision and FEIS for Site-Specific Invasive Plant Treatments. One of the approved herbicides will be used.
Bark	C59. In some of the frost pocket units we visited (such as Unit 462), we saw large Doug firs that are still alive, mostly residual trees from the time that the unit was originally cut. These trees could provide habitat for native species for several decades if left alive on site, and would unlikely successfully reseed the units (sapling trees, especially the hemlocks, found in these units consistently had signs of yearly die-back typical with hard frosts). Since one of the proposed actions is to remove encroaching conifers from these areas, in scoping we recommended only removing small encroaching conifers (<8 in diameter). We also recommend retaining the large down woody debris that currently exists within these units, as it will add to the diversity of wildlife able to utilize these areas.	The forage enhancements in units 414 to 466 do not involve any logging. Large trees and down logs would be retained.
Bark	C60. After not planning regeneration harvests in the District in over a decade, it is troubling that you are bringing them back with a controversial 98-acre unit. The Forest Plan states that forest	A change has been made to the proposed action to reduce Unit 102 from 98 acres to 60 acres. Our original proposal was to have an exception for the 60-acre guideline due to

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	openings created by the application of even-age harvest methods should not exceed 60 acres in the westside-Cascade Douglas- fir forest type.	the urgency of creating quality forage. However, in response to comments such as this, and after carefully reviewing the analysis, an incremental change to the proposed action has been made. Reducing this treatment area from 98 acres to 60 acres would still meet the project's need to provide more early-seral habitat for deer and elk. Also, changing the size to 60 acres eliminates the need to make a Forest Plan exception for guideline FW-349. While this location is currently not meeting the Forest Plan goal to provide forage habitat on 10-15% of the land allocation (B11-009), treating 60 acres would result in a 2% increase in foraging habitat, rather than the 3% increase if 98 acres were treated. Because reducing the size of this unit by 38 acres only represents a 1% change, the effects and benefits described in Chapter 3, would be very similar. Also, the option of deleting this unit was considered as described at s. 2.3.1.6 and 2.3.1.8.
Bark	C61. There is a lot of variability within unit 102.	We have also recognized variability.
Bark	C62. The "Danger Trees" Unit 303 adjacent to the road re-building associated with Unit 102 is disconcerting given that most of the mature standing trees within this unit are large trees (some live, some broken tops and some snags) which are adding diversity and wildlife habitat. We recommend pursuing future management at this intersection in a way that does not require removing old and ecologically valuable trees for the sole purpose of rebuilding roads that are stated to only be temporarily utilized.	Danger trees are those that are likely to fall in the near future. Unit 303 would not remove trees that have sufficient stability to have lasting ecological value.
Bark	C63. "Regeneration harvest" tends to leave few or no snags, and even when logging retains snags, the usual prescription is to have a minimum per acre which can be considerably fewer than needed for cavity-nesting animals. As snags decay, they provide a long-term nutrient and water supply, and their removal obstructs nutrient cycling on the site. As such, this practice can reduce the species richness and key ecological processes associated with early-successional ecosystems. Please drop unit 102.	Some snags would be retained in skips and other would be created.

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Bark	C64. Unauthorized access - Bark found a user-created OHV trail starting at the intersection of FSR 4660 and 4661. The trail goes through the Unit 88 then connects with 5731-120, which is closed with a berm that has been circumvented from the side. If this illegal trail and road closure breach are not addressed, we are concerned that this activity may increase within this area.	Our team was aware of this trail. See response to comment C2.
Bark	C65. We have noticed a pattern of temporary road closures not being implemented by contractors in a timely fashion, leaving access open to forests in units otherwise unreachable by the public. If and when Hunter is under contract, roads reopened for the project could provide unregulated motorized access over the course of multiple years if the roads will be needed for more than one season and there are not effective barriers placed on the entrances.	See responses to comments S2, S3 & S27. Contracts require temporary roads to be closed over the winter.
Bark	C66. Road restoration actions have included boulders and slash being placed along the road, berms, obliteration, re-contouring/de-compacting, re-vegetating, and the removal of trash. We believe these actions where implemented have been effective and encourage the FS to employ these types of strategies within the Hunter project.	The EA discusses a similar suite of actions to close temporary roads at s. 2.2.8.2.
Bark	C67. While Hunter is under contract, roads constructed for the project could provide unregulated motorized access over the course of multiple years, as roads may be needed for more than one season. Bark requests a commitment from the agency to enforce effective barricades on roads built or rebuilt for this project when operations are not occurring. This includes time when the area is still under contract but outside the normal operating season.	See responses to comments S2, S3 & S27. Contracts require temporary roads to be closed over this winter.
Bark	C68. We ask that the FS clarify the method to close the 4200-389, which is not visible from road 42. We raised a concern that simply cutting back the trees and constructing a berm may invite more harm than good if not done thoughtfully (the road being on flat ground, which usually creates situation where berms are easily circumvented).	This road is shown as being open in our transportation database. However, it is closed and has been for a while. There is an effective berm with lots of trees growing on the road making it undrivable. The database will be corrected.
Bark	C69. Bark recommends dropping unit 108a/108b. It is already diverse and the access road should not be built.	While some elements of diversity may be present in parts of the unit, the purpose and need statements are broader (s. 1.3.1). The analysis found that the thinning prescription in

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		this plantation would move the area toward desired conditions.
Bark	C70. Bark recommends dropping unit 124b. It has cherry and is already diverse.	The prescription for unit 124b involves retaining some of the bitter cherry while cutting some of it back to allow it to resprout.
Bark	C71. Bark found a wet area in 136, it should be removed from the unit.	During project layout, the field crew applies the appropriate buffer to wet areas and streams.
Bark	C72. Bark recommends dropping unit 52. It is already diverse.	The appropriate stream protection buffer will be applied. The prescriptions for both the Riparian Reserve and Matrix portions were found to be appropriate to move the area toward desired conditions.
Bark	C73. The Hunter analysis fails to discuss the need for a minimum road system, much less assess what the minimum road system for the project area might look like or whether the proposed road related actions work towards that minimum road system.	See response to comment C39. The project would move the area toward the minimum road system.
Bark	C74. The FS states that some roads identified in the travel analysis report as "not likely needed" were found to be needed in the near future. The FS should explain the timeframe it considered when analyzing whether a road is needed or unneeded within the project area, and it should explain the need. Bark requests the FS reconsider decommissioning in this project for these roads.	When a road was found to be need for vegetation management, it is likely to be need long into the future. Some roads that were found to be needed would be closed and stormproofed to minimize resource impact until the road is needed again. The consideration of additional decommissioning was considered at s. 2.3.1.1.
Bark	C75. The FS notes that past decisions approved decommissioning of roads within the Hunter Project area, and that the Hunter Proposed Action will not include roads with existing NEPA decisions to either close or decommission. These prior decisions set up the baseline for this project. Knowing that, the FS should explain how many of those miles were actually physically decommissioned to date. The way the FS presents its previous work on roads, it appears to claim credit for prior, unrelated decisions which may or may not have been acted upon. This presents a false starting point and is likely to confuse the public, precluding meaningful comment.	See response to comment C41.
Bark	C76. We brought up several site specific road issues in our scoping comments. The FS mostly responded by saying that they are not interested in revisiting past NEPA which authorized	See responses to comments S2, C2 & C45.

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	decommissioning roads that are currently not yet decommissioned. We recommended reinforcing existing closures so the roads would not be illegally accessed before the roads are actually decommissioned. This was not a request to revisit old NEPA on decommissioning roads, however it was a request that the FS address illegal activity that it knows to be occurring within the Hunter project area (doing this may require the berms proposed in this to not simply be "similar to the berms previously constructed on these roads").	
Bark	C77. Erosion is occurring on road 6311-130.	This road is outside the Hunter planning area. The Bass contract has addressed the issues with this road.
Bark	C78. Mistletoe units - The eastern portion of Unit 230 currently has some areas suitable for use by owls and other late-successional wildlife. We acknowledge and appreciate the agency's direction to actively promote forest structure which benefits owls. However, Bark also values - and must again 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 proposed treatment in dwarf mistletoe units would not remove any large trees. All of the larger infected hemlock trees would remain and dwarf mistletoe would not be eliminated from the stands.
Bark	C79. Unit 240 of the hemlock dwarf mistletoe treatment overlaps with a portion of the Burnt Granite trail #595. Please take steps to ensure that this trail is clear of logging debris so it can be enjoyed by forest users post-project implementation.	This is not a system trail and receives no maintenance. There is no logging associated with this unit.
Bark	C80. Climate change - The FS must continue to carefully consider the effects of greenhouse gas emissions and climate change in all of its decisions.	Climate change is addressed at s. 3.17.
Bark	C81. Summary of Bark's form card.	Bark delivered a box of paper forms that contain the exact same text as described in comments S59 to S63.
Jones	C82. I do not believe that logging within units that contain native trees and have never been previously logged is necessary to achieve the stated aims of this project (unless you count the aim to log these areas). The scope of the Hunter Project is so wide that including logging in these areas is simply not necessary. The role of native forests in sustaining everything on this planet is unique	See responses to comments S34, S35 & C51.

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	and crucial. There are plenty of areas that are already being "managed." Please let these native areas be.	
Jones	Please reconsider the severity of the proposed "regeneration harvest." Cutting that leaves only "scattered, individual trees" is too aggressive. Foraging animals need shade, too, and projection from poachers.	See responses to comments S39, S52, S62, S64 & C60. Skips will be included to provide shade and break up the sight lines.