

APPENDIX 2 – ISSUES GENERATED THROUGH SCOPING

Issue	Public Issue Statement	Response
Healthy Forest Restoration Action	Why is this area a priority for HFRA? It is technically within the Hood River County CWPP’s defined WUI, but it is far from any homes or communities and it is outside of The Dalles Municipal Watershed. Perhaps a traditional EA, with multiple alternatives and a standard notice-comment-appeal process . . . would be more appropriate.	This project would reinforce fuel reduction efforts occurring with The Dalles Watershed Fuel Break. Also, the Hood River County CWPP identified this as a project needed to reduce hazardous fuels within the county (Hood River County, CWPP, page 120). In addition, this project fits under the National Fire Plan goals and objectives for hazardous fuels reduction projects: “Hazardous fuels reduction treatments are designed to reduce the risks of catastrophic wildland fire to people, communities, and natural resources while restoring forest and rangeland ecosystems to closely match their historical structure, function, diversity, and dynamics.”
	As an HFRA project, we’d like to see a more direct correlation, in the EA, between the proposed prescriptions and the intended outcome of fuels reduction.	The intended outcome of the project is to develop an uneven-aged stand with canopy closure that would allow fire behavior to change from crown fire to surface fire, and to have stand species composition reflecting Condition Class 1 (ponderosa pine, western larch, white oak, and dry-climate Douglas-fir). The Fire/Fuels Management and Vegetation sections (Chapter 3) describe the relationship between the proposed prescriptions and intended outcome of fuels reduction in more detail.
NEPA Process	We hope you not plan on using the 6-page “Proposed Action” we recently received as a replacement for public comment on environmental documents prepared pursuant to NEPA. The notice-comment-appeal regulations are not a license to ignore the CEQ reg. These two sets of regulations must be harmonized by combining the “proposed action” with either the scoping or the EA/EIS process. The Forest	This Environmental Assessment was prepared under the HFRA authority. All of the procedural requirements of that law have been followed. This project is subject to the objection period described in Pre-decisional Administrative
	Service should not rely on “proposed actions” which are not defined anywhere in the FS regs or the CEQ	Review Process (36 CFR 218), rather than the notice and comment and appeal periods described in 36

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<p>NEPA Process continued . . .</p>	<p>regs. The CEQ regs require that the FS provide public comment on “environmental documents” defined as EAs and EISs, NOT proposed actions.</p>	<p>CFR 215. In the objection period, the Environmental Assessment will be made available to the public for review at: http://www.fs.fed.us/r6/mthood/projects/index.shtml#hoodriver</p>
	<p>Though not required under HFRA, you should consider more than one action alternative for this project. There is enough active involvement through the collaborative group that a second alternative could be easily developed by using group concerns over the cutting of large trees and new roads.</p>	<p>Based on scoping comments, Alternative 2 was fully analyzed in this environmental assessment. In Alternative 2, vegetation management treatments would occur in existing plantations and no treatments would occur in naturally appearing stands. Alternative 2 reduces the proposed restoration thinning treatments to 594 acres, compared to 2131 acres in Alternative 1. Alternatives 1 and 2 both include approximately 1 mile of temporary road construction. Neither alternative proposes building new permanent roads. Both alternatives proposed to decommission 8 miles of roads and close another 16 miles of road. See Chapter 2 for full descriptions of the two alternatives.</p>
<p>Community Wildfire Protection Plan (CWPP)</p>	<p>Explain how this project is consistent with the CWPP. Establish the boundary of the communities at risk and measure the WUI (for this project) from the homes, buildings and community infrastructure that forms the community, not from the remotest fencepost on the remotest parcels of private land in the area.</p>	<p>A Wildland-Urban Interface (WUI) is defined as: “an area within or adjacent to an at-risk community that is identified in recommendations to the Secretary in a community wildfire protection plan” [HR 1904, Section 101.16(A)]. This project lies within an identified WUI, as outlined in the Hood River County CWPP and Wasco County CWPP. Additionally, Wasco County CWPP identified the Mill Creek Watershed, which is adjacent to the project area, as an at-risk community. The planning area is within the wildland-urban interface (WUI) as identified in the Hood River County CWPP (see Figure 28, page 87)</p>
	<p>As directed by the National Fire Plan, and given limited resources, agencies must prioritize treatment of fuels in areas that will have the greatest gain in terms of protecting homes and communities, specifically “high-risk” rural communities with more</p>	<p>The Wasco County CWPP identifies the watershed as a community at risk and high priority for treatment. “Mill Creek Municipal Watershed is the source of water for the City of The Dalles. It is unpopulated but has high values because of the importance of the</p>

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<p>Community Wildfire Protection Plan continued . . .</p>	<p>than 250 people per square mile (USDI/USDA 2001).</p>	<p>water supply for the city. . . . (Wasco County, CWPP, page 50)” Based on this distinction, the North Fork Mill Creek Restoration Opportunities Project is a high priority project for the Barlow and Hood River Ranger District because it is designed to reinforce fuel reduction efforts occurring with The Dalles Watershed Fuel Break.</p>
	<p>Cooperation with local landowners is an important step in ensuring effective fuels reduction for this area. Please explain how local landowners were involved in the development of CWPP priorities and recommendations, and what steps they are taking to reduce fuels on private land in this area.</p>	<p>The cooperation with local landowners and fuels reduction activities on private lands are described in the Hood River County CWPP (http://www.co.hood-river.or.us/documents/CWPP.pdf) and the Wasco County CWPP (http://co.wasco.or.us/emergsvcs/CWPP.pdf). These documents served as the basis for this project. Management of fuels on private lands is the responsibility of Oregon Department of Forestry, and there were a key played in the development of the CWPPs.</p>
<p>Fuels Reduction Activities</p>	<p>Removing canopy fuels can reduce crown-to-crown fire spread, but the science clearly shows that removing canopy cover can also increase fire hazard by increasing solar insolation which causes fuels to warm and dry and increases wind speeds. Removing shade trees also frees site resources (light, water, nutrients) that can stimulate the growth of future ladder fuels and increase the cost of maintaining fuel treatments. HFRA only grants authority to remove “hazardous fuels.” Do not remove any tree that provides useful shade to keep fuels cool and moist or that helps suppress the growth of future ladder fuels.</p>	<p>Opening crown spacing to reduce the probability of a wildland fire transition from a surface fire to a crown fire has some trade offs. Although opening the crown spacing could increase surface rates of spread, it also makes the fire easier to control and under severe weather conditions an open stand is less likely to support a crown fire. These trade-offs are described more fully in the Fire/Fuels Management section of Chapter 3.</p>
	<p>We commend you on your plan to use prescribed fire to try to restore a more natural fuel level and fire regime. Please take steps to use prescribed fire at the ecologically appropriate times of year, and take steps to protect critical resources that could be adversely</p>	<p>The timing for prescribed fire (underburning) is described in the Fire/Fuels Management section of Chapter 3. The design criteria/mitigation measures in Chapter 2 described the steps taken to protect critical resources. The adverse effects of underburning are</p>

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<p>Fuels Reduction Activities continued . . .</p>	<p>affected by fire such as water courses, pockets of large snags, etc.</p>	<p>described and analyzed by each resource area in Chapter 3.</p>
	<p>The Forest Service should anticipate some mortality from prescribed burning. Mortality is certainly a natural possibility, and it is important that “salvage” logging of any of these burned trees is NOT allowed as a subsequent project without careful and full analysis.</p>	<p>This project does not involve any salvage logging. As described in Chapter 2, treatment units with both proposed thinning and underburning activities would only be underburned following the completion of the logging operations. For treatment units with only underburning as the proposed treatments, no logging would occur. Any additional logging proposed in these treatment units would be subject to a full NEPA analysis: no additional analysis is planned.</p>
	<p>Oregon Wild provided 23 recommendations for developing fuels reduction activities. The specific recommendations are contained in the scoping letter found in the project record.</p>	<p>These recommendations were reviewed by the interdisciplinary team and used to develop/refine the analysis contained in Chapter 3.</p>
<p>Large Diameter Trees / Legacy Trees</p>	<p>The science on fuels reduction is very clear; the smaller, densely packed trees are significantly more flammable and risk fueling a high intensity fire. The larger mature trees are more fire resistant. The North Fork Mill Creek collaborative group was very specific in not supporting the logging of larger diameter trees.</p>	<p>The collaboration group recommendations (Appendix 1) state: “We recommend thinning the young, small diameter in-growth that is a result of fire suppression. All of the largest diameter class trees shall be retained, and any thinning shall leave variable tree density and meet forest requirements for snags. There was agreement that the largest diameter classes would not be cut within the stands proposed for restoration.” The collaborative group recommendations, including retention of large trees, were used to develop the stand objective table (Table 2-2). This table was shared with the collaborative group and specific suggestions were incorporated, as appropriate.</p>
	<p>The HFRA says that the structure and composition of old growth shall be fully maintained and restored by implementing the LRMP or RMP.</p>	<p>This project would retain the structure and composition of pre-fire suppression old growth by promoting fire-adapted species where their health condition does not threaten the overall health of the stand. Also, the treatments would not impact the Special Old Growth Area (A7) in the planning area.</p>

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<p>Large Diameter Trees / Legacy Trees continued . . .</p>		<p>Further, HFRA provides that old growth direction in the Northwest Forest Plan Record of Decision is sufficient to meet the requirements of the Act. The requirements of HFRA and a description of how the project meets the requirements are contained in the Regulatory Framework section of Chapter 2.</p>
	<p>The Mill Creek watershed has a severe shortage of large diameter old-growth trees. Due to this shortage there is no room to further log any large diameter trees.</p>	<p>Field visits and GIS data layers do not indicate a shortage of large diameter old-growth trees within the watershed. Within the planning area, large trees would be retained where appropriate as indicated in the stand objective table. Leaving all large trees would not meet the purpose and need for this project due to the infestations of dwarf mistletoe.</p>
	<p>The diameter classes in the current proposal include a class of 24"-30", and mentions that in</p>	<p>The stand objective table, including the diameter sizes, was developed based on the forest health</p>
	<p>some instances there are too many of these trees. After extensive field checking we have not been able to verify that there are "too many" trees in this large diameter class. Therefore we recommend not thinning trees in this diameter class. The diameter class should be modified to be 21"-30" to reflect the signs of forest and ecosystem complexity that are developing when trees reach the 21" diameter. In this situation it might make sense in some instances to use a different diameter limit for grand fir than other species.</p>	<p>issues within the project area. The forest health issues are summarized in memo entitled "Insect and Disease Implications for North Fork Mill Creek Restoration." This memo summarizes the field observations by an entomologist, plant pathologist, and silviculturalist. In addition, each treatment unit was visited to determine the forest health issue and potential treatment. These documents are available in the project record and analyzed in the Vegetative Resources section of Chapter 3.</p>
	<p>The trees that are over 30" in diameter should not be logged or girdled under any circumstances regardless of species unless they are a very direct hazard threat to the public.</p>	<p>All trees over 30-inch in diameter would be retained unless there is a compelling forest health, fuels reduction or safety reason to treatment the trees. If possible, other treatment measures (e.g., pruning limbs or girdling) would be used. If the trees are girdled, they would remain on-site. The intention is to leave as many trees over 30-inch as possible. See the Stand Objective table (Table 2-2) provides more details for each tree species.</p>

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<p>Insects and Disease</p>	<p>Mistletoe is a natural part of forest diversity. Mistletoe-infected trees provide some of the best habitat for nesting species like the Northern Spotted Owl. Girdling is better than taking the trees down, but leaving the trees or just pruning them is even better.</p>	<p>The degree of mistletoe infection in the younger Douglas-fir trees (<120 years) varies from very low levels in some stands to very high levels in others. Generally, where heavily infected Douglas-fir overstory exists, the infection level in the adjacent and understory trees is also high and would be expected to continue to increase as long as the source of infection exists. As described in Table 2-2, pruning and girdling are the first option, except when the hazardous fuels reduction objectives cannot be met without removing the tree. The impacts of mistletoe are described in the Vegetation Resources, Existing Conditions section of Chapter 3.</p>
	<p>The current plan appears to prescribe 1-2 acre clear cuts to deal with root rot pockets. This treatment will result in significant negative ecosystem and hydrologic impacts. To mitigate these impacts in the densest pockets of root rot you should still "leave the best of what's left" of the trees in the stand, preferably a minimum of 10 of the best remaining trees per acre in these situations.</p>	<p>The impacts to ecosystem and hydrologic impacts of treating the root rot pockets are described by each resource area in Chapter 3. No significant effects were identified through the analysis process.</p> <p>The Vegetation Resource section in Chapter 3 describes the impacts of root rot pockets Thinning and small patch openings would reduce root-to-root contact and promote the growth of species in the stands that are resistant or have an increased tolerance to root disease. Trees with improved vigor would be more resistant to root disease, as well as the commonly associated insects. In order to achieve this goal, the marking guides will "leave the best of what's left," but this may not meet 10 trees per acre.</p>
<p>Snags and Downed Woody Debris</p>	<p>There is a shortage of large down wood and snags across the landscape due to extensive logging over the past century. For this reason, we do not support the proposed forest plan amendment to allow the Forest Service to not meet down wood and snag standards in the project area.</p>	<p>This project does not include a Forest Plan amendment. This project does proposed a Forest Plan exception for Standard FW-215, related to snags. Exceptions to these standards are needed to meet the purpose and need of effective fuel reduction. Exceptions are allowed under the Forest Plan, if they are identified during the interdisciplinary process.</p>

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<p>Snags and Downed Woody Debris continued . . .</p>		<p>Currently, the proposed project area is between 30 and 80 percent snag and down wood levels as outlined in the DecAID Advisor. The proposed project would retain snags and down wood at the 30 to 50 percent level in the planning area, which does not meet the FW-215. The project does not impact any designated pine marten or pileated woodpecker habitat areas (B5). Snags would be retained to meet habitat requirements for the northern spotted owl. Mitigation measures are incorporated into the proposed action to ensure that there is no major impact because adequate snags and down wood would be retained within the watershed. For a complete analysis, see the Wildlife Resources section of Chapter 3.</p>
<p>Road Management</p>	<p>The current road obliteration plan is a good step in the right direction. We encourage the USFS to include more of this type of management, as there are still significantly more roads that need to be obliterated to restore the aquatic integrity of this watershed.</p> <p>The proposed action mentions that there will be "some temporary road construction". These temp roads need to be identified, justified and their impacts analyzed. (Please provide a map of proposed road management associated with this project.)</p> <p>The EA must also clearly state whether any roads are proposed for construction or reconstruction within Riparian Reserves, and which of these if any will require stream crossing(s).</p>	<p>All the roads within the planning area (6,600 acres) were considered for potential road decommissioning and road closure. Considering management and recreation needs, approximately 9 miles were identified for decommissioning and 16 miles were identified for closure. In addition to the road proposals, 12 culverts were identified for replacement/removal in order to improve the aquatic integrity of the watershed.</p> <p>A map of the temporary roads is contained in Chapter 2 (Figure 2-2). Approximately 1-mile of temporary roads would be constructed to complete the project. These roads would be immediately decommissioned after use. The impacts from the temporary roads are analyzed by resource area in Chapter 3.</p> <p>Proposed road maintenance, including reconstruction, is detailed in Table 2-4. No road construction is proposed as part of this project. The impact of the proposed road maintenance to riparian reserves and stream crossings is analyzed in the Watershed</p>

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<p>Road Management continued . . .</p>		Resources and Aquatic Species and Associated Habitat sections of Chapter 3.
	<p>New roads should only be considered as a last resort for access to treatment areas. One of your evaluation criteria of whether to build new road should be whether any degradation of soil is offset by long-term benefits brought about by the proposed action.</p>	<p>No new roads are being proposed as part of this project. Only 1-mile of temporary roads is being proposed. The impacts of the temporary road construction and decommissioning are analyzed by each resource area in Chapter 3, including the Soil Productivity section.</p>
	<p>The agency should do an analysis that illuminates how many acres of thinning are reached by each road segment so that we can distinguish between short segments of spur that allow access to large areas (big benefit, small cost) and long spurs that access small areas (small benefit, big cost).</p>	<p>Figure 2-2 provides a map of the proposed logging system for the project.</p>
	<p>In the EA, please provide a stand by stand description of the road spur lengths and the acres each spur accesses for thinning.</p>	<p>The Transportation section of Chapter 3 provides an analysis of the proposed log haul route. Details on how the sales would be accessed are determined during implementation, using the information provided in the environmental assessment and decision notice.</p>
	<p>I can't see why we want to close good gravel roads that cost taxpayers thousands of dollars to build.</p>	<p>One of the underlying needs for this project is to restore wildlife security and aquatic integrity within the planning area while integrating the public's need for access. In order to meet this purpose and need, the project proposed to decommission or close approximately 25 miles of road. The remaining roads in the planning area would remain open for public access.</p>
	<p>1700662 is a good gravel road, lets leave SOME access for recreation.</p>	
	<p>Do some repair work on 1711000 which has been neglected for many years.</p>	<p>As part of this project, the 1711000 road is proposed to have brushing, drainage, surface, and blading maintenance work complete.</p>
	<p>Are these roads [roads proposed for year-round closures] retained for management purposes and project implementation? Or why?</p>	<p>The roads are being retained to provide management/administrative access by permission. One example is to access a water quality monitoring station.</p>
<p>Will you be using the Mill Creek RD, out of The Dalles, as a haul route this summer? If so, will you be</p>	<p>The Mill Creek Road is not being proposed as a haul route for this project.</p>	

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Road Management continued . . .	constructing the road that moves west of the cement bridge (past the new fish culvert)? Or will you be using the road that goes directly uphill and past the watershed?	
Logging Systems	And ground-based logging that allows heavy equipment off of roads may cause significant soil disturbance that will not be offset by any intended benefits to the vegetation.	The impacts of ground-based logging on soil resources are analyzed in the Soils Productivity section of Chapter 3. In addition, specific project design criteria/mitigation measures protect soil resources. These are listed in the Roads and Soils Resources sections of the Design Criteria/Mitigation Measures in Chapter 2.
Wildlife Species	Impacts on old-growth species should be discussed in detail in the EA. This should include an analysis of effects on such species as the Northern spotted owl, goshawk, bats, woodpeckers, Pine Marten, California Wolverine, Great Gray Owl, Pygmy Nuthatch or Bald Eagle, and other special status species listed in applicable management plans.	A full analysis of wildlife species can be found in the Wildlife Resources section of Chapter 3.
Water Quality	Project analysis should separately discuss each of the Aquatic Conservation Strategy objectives (under the Northwest Forest Plan).	An Aquatic Conservation Strategy analysis is included in Chapter 3. The analysis discussed each of the nine ACS objectives.
	Any commercial harvest activities or road construction in key watersheds or municipal watersheds should be avoided in order to protect water quality.	No activities are proposed in municipal watersheds. Proposed activities and the associated impacts to key watersheds are analyzed in the Watershed Resources section of Chapter 3.
Trails	Where do the funds come from and how much is needed for the new non-motorized trails? Is this recreation capitol investment money or does the project itself carry this cost?	Funding for these projects will be determined during the implementation phases of this project.