

**CRGNSA CONSISTENCY DETERMINATION**  
**FOREST PRACTICE, CD-14-08-S**  
**GIRL SCOUTS OF OREGON AND SW WASHINGTON, INC.**  
**CAMP ARROWHEAD**  
**COLUMBIA RIVER GORGE NATIONAL SCENIC AREA**  
**SKAMANIA COUNTY, WA**

**BACKGROUND**

The proposed forest practice by Girl Scouts of Oregon and SW Washington is required to be consistent with the purposes of the Columbia River Gorge National Scenic Area Act as determined by the Forest Service pursuant to Section 14(d) of the Columbia River Gorge National Scenic Area Act. A complete consistency review application was received by my office in October 2014.

**DECISION**

I find that the above proposal is consistent with the Columbia River Gorge National Scenic Area (CRGNSA) Management Plan provided that it is implemented as described in the application materials, the CRGNSA Consistency Determination Findings of Fact, referenced as CD-14-08-S, and provided the following conditions are applied:

1. Should any historic or prehistoric cultural resources be uncovered during project activities, the applicant shall cease work and immediately notify the CRGNSA office and the Washington Office of Archeology and Historical Preservation. The applicant will also notify the Indian Tribal governments within 24 hours if the resources are prehistoric or otherwise associated with Native American Indians.
2. Work shall not occur within the 200' buffer of the pond in the northeast corner of the central unit.
3. If any new wet areas are identified during implementation, the applicant shall contact the Forest Service to identify ways to avoid or mitigate work within the riparian area and its buffer.
4. In the North and Central Units: no chainsaw or heavy equipment work shall occur between March 1 and July 15, which is the critical northern spotted owl nesting period.
5. In the South Unit: no chainsaw or heavy equipment work shall occur between April 1 and July 15.
6. Impacts to Oregon white oak trees shall be avoided to maximum extent practicable.
7. As many of the dead trees as possible shall be left in place as snags, when they do not conflict with the intent to control Laminated root rot and provide a safe environment.
8. All disturbed soil shall be vegetated by seed or planting to achieve 80% native ground cover within 1 year of project implementation.

9. Trees removed as part of the thinning project shall be felled, de-limbed, and bucked with a chainsaw, then pre-bunched to designated skid trails by a small, track mounted excavator and skidded out with a rubber-tired skidder or a dozer. Logs shall be loaded onto log trucks at designated landings and sent to the appropriate mill or log yard via Girl Scout Road/Bergen Road and WA State Highway 14.

Other Requirements

10. It is the responsibility of the landowner to ensure activities do not trespass on other landownerships.

### ADMINISTRATIVE REVIEW OPPORTUNITIES

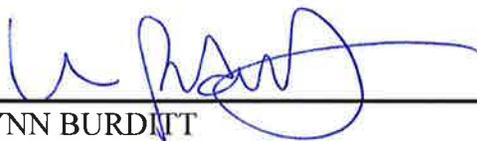
A written request for review of the Consistency Determination, with reasons to support the request, must be received within 20 days of the date shown with the Area Manager signature below. Requests for review should be addressed to: Request for Review, Regional Forester, P.O. Box 3623, Portland, OR 97208.

### IMPLEMENTATION DATE

This project may begin immediately as long as it complies with the conditions as described in items (1-10) above. This decision expires two years after the date on this determination. If implementation has not commenced before that date, a new consistency review or extension shall be required.

### CONTACT

The Columbia River Gorge National Scenic Area staff prepared an analysis file in conjunction with this project. For further information, contact Christine Plourde at the Columbia River Gorge National Scenic Area, phone: (541) 308-1713, e-mail: [cplourde@fs.fed.us](mailto:cplourde@fs.fed.us).



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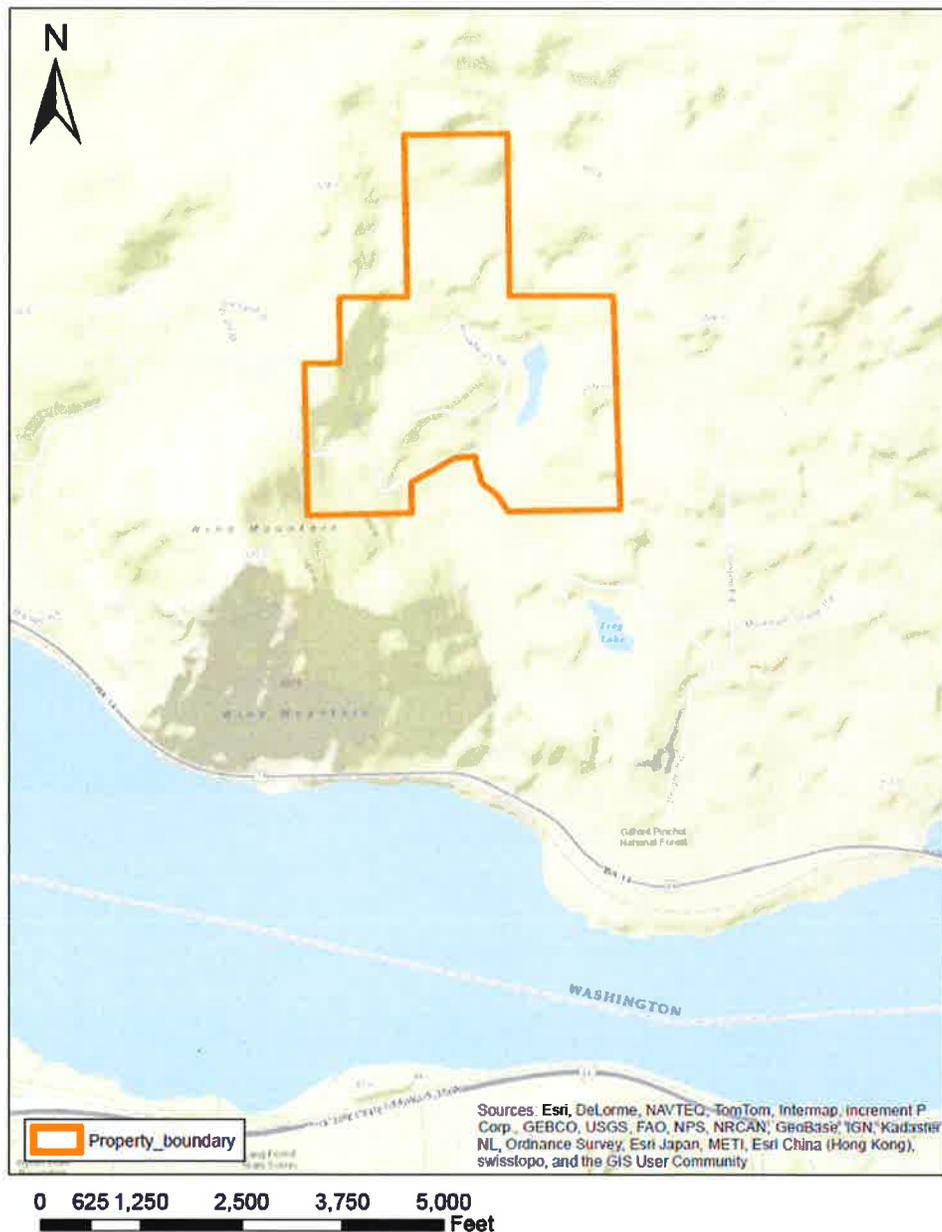
Area Manager

January 8, 2015  
Date

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## FINDINGS OF FACT

<b>LANDOWNER:</b>	Girl Scouts of Oregon and SW Washington Inc.
<b>PROPOSED ACTION:</b>	Forest Practice
<b>LOCATION:</b>	Township 3 North, Range 8 East, Section 25 Tax lot ID: 4000
<b>NATIONAL SCENIC AREA DESIGNATION:</b>	Special Management Area
<b>LAND USE DESIGNATION:</b>	Forest
<b>LANDSCAPE SETTING</b>	Coniferous Woodland



## FINDINGS OF FACT:

The following findings of fact contain the applicable standards and guidelines from the CRGNSA Management Plan. The Management Plan, as adopted in 2004 and updated in 2011, is in effect. The CRGNSA Management Plan standards and guidelines are displayed in regular type. The findings are displayed in **bold type**.

### A. PUBLIC COMMENT

A notice describing the project was sent to a mailing list of known interested parties and adjacent landowners on October 20, 2014. A period of 30 days was allowed for public comment.

The following is a summary of the comments that were received:

The Gifford Pinchot Accountability Group submitted comments stating they were supportive of the project and encouraged it to move forward as quickly as possible to protect and improve forest health. The group encouraged the applicant to do what is needed to ensure a healthy forest and safe environment.

*The Forest Service recognizes the interest in managing the camp for a healthy forest and safe environment. The proposed activities require evaluation for consistency with the CRGNSA Management Plan and associated resource protection guidelines. The finding disclosed in this document address these requirements.*

The Friends of the Columbia Gorge submitted comments stating that the proposed forest practice must meet requirements for SMA Forest Practices as required by the CRGNSA Management Plan and National Environmental Policy Act. The comments emphasized resource protection guidelines and stated that the project should meet the higher scenic standard of Not Visually Evident.

*Guidelines for SMA Forest Practices are addressed in the following Findings of Fact. The proposal has been evaluated by Forest Service resource specialists for consistency with the required guidelines. The proposed activity is required to meet the scenic standard of Visually Subordinate based on the Land Use Designation and Landscape Setting.*

### B. PROJECT PROPOSAL

Given its purpose as a youth camp for the Girl Scouts of Oregon and Southwest Washington, Laminated Root Rot and associated bark beetle mortality has become a major safety issue and a threat to the overall health of the forest at Camp Arrowhead. The purpose of this forest practice is to mitigate the spread of Laminated Root Rot in affected areas and to improve the overall vigor of the un-affected trees (and thus resistance to bark beetles). Approximately 34 acres of forest would be treated to improve forest vigor. Details of the proposal are available in the application signed October 7, 2014.

## C. LAND USE DESIGNATIONS

*The Management Plan, Part II, Chapter 2 Forest Land, SMA guidelines, states:*

X. Forest practices in accordance with an approved forest practices application (see application requirements) and subject to the additional guidelines in this chapter.

**Findings: The proposed forest practice qualifies as a review use. Additional guidelines are addressed under appropriate resource areas.**

**Forest practice guidelines 1, 2 and 3 (MP Part II, Chapter 2 (Forest Land)) have been met in the application and stewardship plan.**

## D. SCENIC RESOURCES

*The Management Plan, Part I, Chapter 1 (Scenic Resources), SMA guidelines, states:*

### SMA Design Guidelines Based on Landscape Settings

1. The following guidelines apply to all lands within SMA landscape settings regardless of visibility from KVAs (includes areas seen from KVAs as well as areas not seen from KVAs):
  - B. Coniferous Woodland and Oak-Pine Woodland: Woodland areas shall retain the overall appearance of a woodland landscape. New developments and land uses shall retain the overall visual character of the natural appearance of the Coniferous Woodland and Oak-Pine Woodland landscape.
    - (1) Buildings shall be encouraged to have a vertical overall appearance in the Coniferous Woodland landscape setting and a horizontal overall appearance in the Oak-Pine Woodland landscape setting.
    - (2) Use of plant species native to the landscape setting shall be encouraged. Where non-native plants are used, they shall have native-appearing characteristics.

**Findings: The proposed forest practice is within the Coniferous Woodland landscape setting and does not include structural development. Only native plant species would be used for reforestation, including western red cedar and ponderosa pine. The proposed native species would retain the overall visual character of the Coniferous Woodland landscape setting at Camp Arrowhead.**

### SMA Guidelines for Development and Uses Visible from KVAs (Guidelines 8-14 are not applicable)

1. The guidelines in this section shall apply to proposed developments on sites topographically visible from key viewing areas.
2. New developments and land uses shall be evaluated to ensure that the required scenic standard is met and that scenic resources are not adversely affected, including cumulative effects, based on the degree of visibility from key viewing areas.

3. The required SMA scenic standards for all development and uses are summarized in the following table:

<b>Required SMA Scenic Standards</b>		
<b>LANDSCAPE SETTING</b>	<b>LAND USE DESIGNATION</b>	<b>SCENIC STANDARD</b>
Coniferous Woodland, Oak-Pine Woodland	Forest (National Forest Lands), Open Space	Not Visually Evident
River Bottomlands	Open Space	Not Visually Evident
Gorge Walls, Canyonlands, Wildlands	Forest, Agriculture, Public Recreation, Open Space	Not Visually Evident
<b>Coniferous Woodland, Oak-Pine Woodland</b>	<b>Forest, Agriculture, Residential, Public Recreation</b>	<b>Visually Subordinate</b>
Residential	Residential	Visually Subordinate
Pastoral	Forest, Agriculture, Public Recreation, Open Space	Visually Subordinate
River Bottomlands	Forest, Agriculture, Public Recreation	Visually Subordinate

4. In all landscape settings, scenic standards shall be met by blending new development with the adjacent natural landscape elements rather than with existing development.
5. Proposed developments or land uses shall be sited to achieve the applicable scenic standard. Development shall be designed to fit the natural topography, to take advantage of landform and vegetation screening, and to minimize visible grading or other modifications of landforms, vegetation cover, and natural characteristics. When screening of development is needed to meet the scenic standard from key viewing areas, use of existing topography and vegetation shall be given priority over other means of achieving the scenic standard such as planting new vegetation or using artificial berms.
6. The extent and type of conditions applied to a proposed development or use to achieve the scenic standard shall be proportionate to its degree of visibility from key viewing areas.
- A. Decisions shall include written findings addressing the factors influencing the degree of visibility, including but not limited to:
- (1) The amount of area of the building site exposed to key viewing areas,
  - (2) The degree of existing vegetation providing screening,
  - (3) The distance from the building site to the key viewing areas from which it is visible,
  - (4) The number of key viewing areas from which it is visible, and
  - (5) The linear distance along the key viewing areas from which the building site is visible (for linear key viewing areas, such as roads).
- B. Conditions may be applied to various elements of proposed developments to ensure they meet the scenic standard for their setting as seen from key viewing areas, including but not limited to:
- (1) Siting (location of development on the subject property, building orientation, and other elements),
  - (2) Retention of existing vegetation,
  - (3) Design (color, reflectivity, size, shape, height, architectural and design details and other elements), and

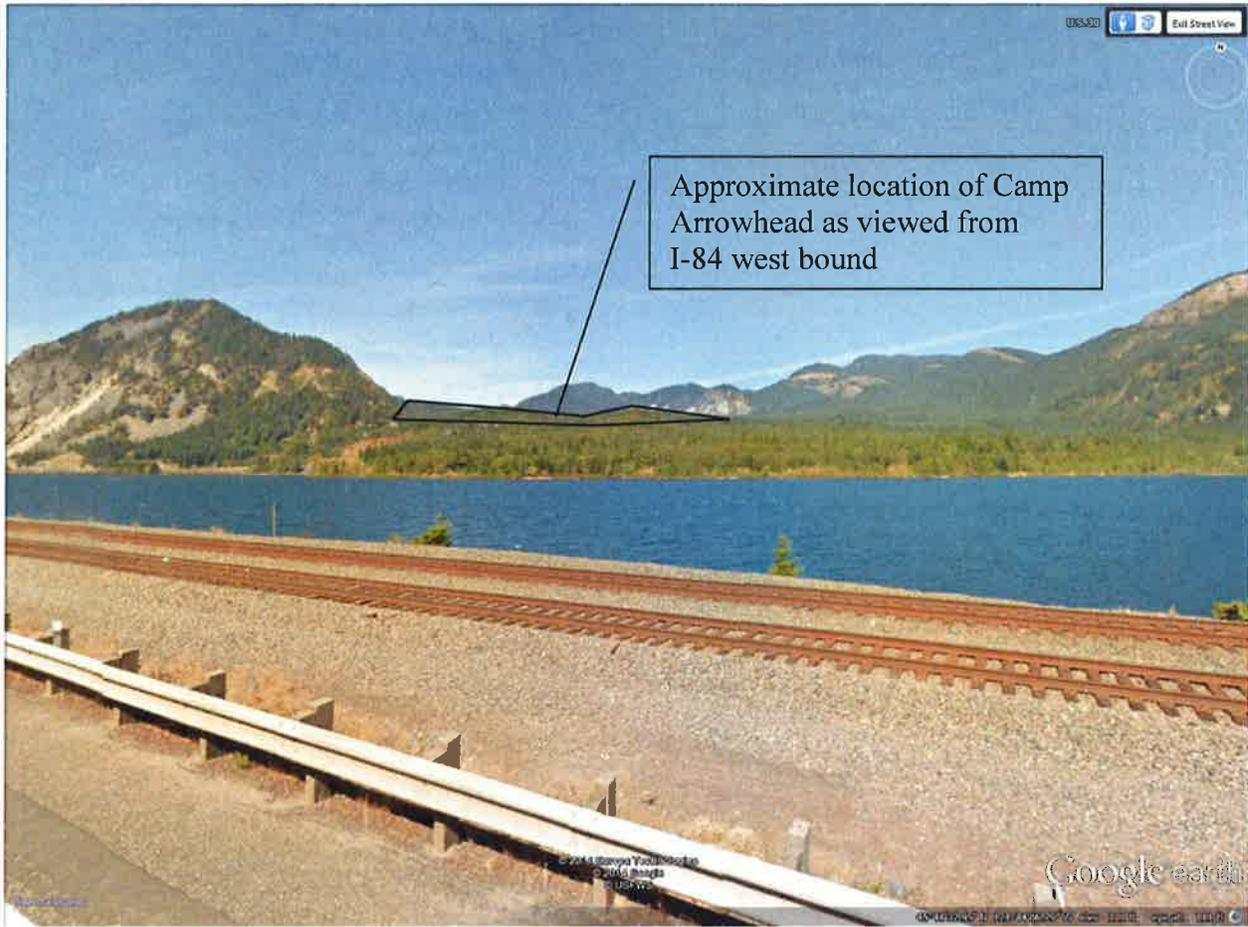
(4) New landscaping. 7. Sites approved for new development to achieve scenic standards shall be consistent with guidelines to protect wetlands, riparian corridors, sensitive plant or wildlife sites and the buffer zones of each of these natural resources, and guidelines to protect cultural resources.

**Findings: The scenic standard for this project is Visually Subordinate because the camp is designated SMA Forest in the Coniferous Woodland landscape setting. The landscape is topographically visible from the following Key Viewing Areas:**

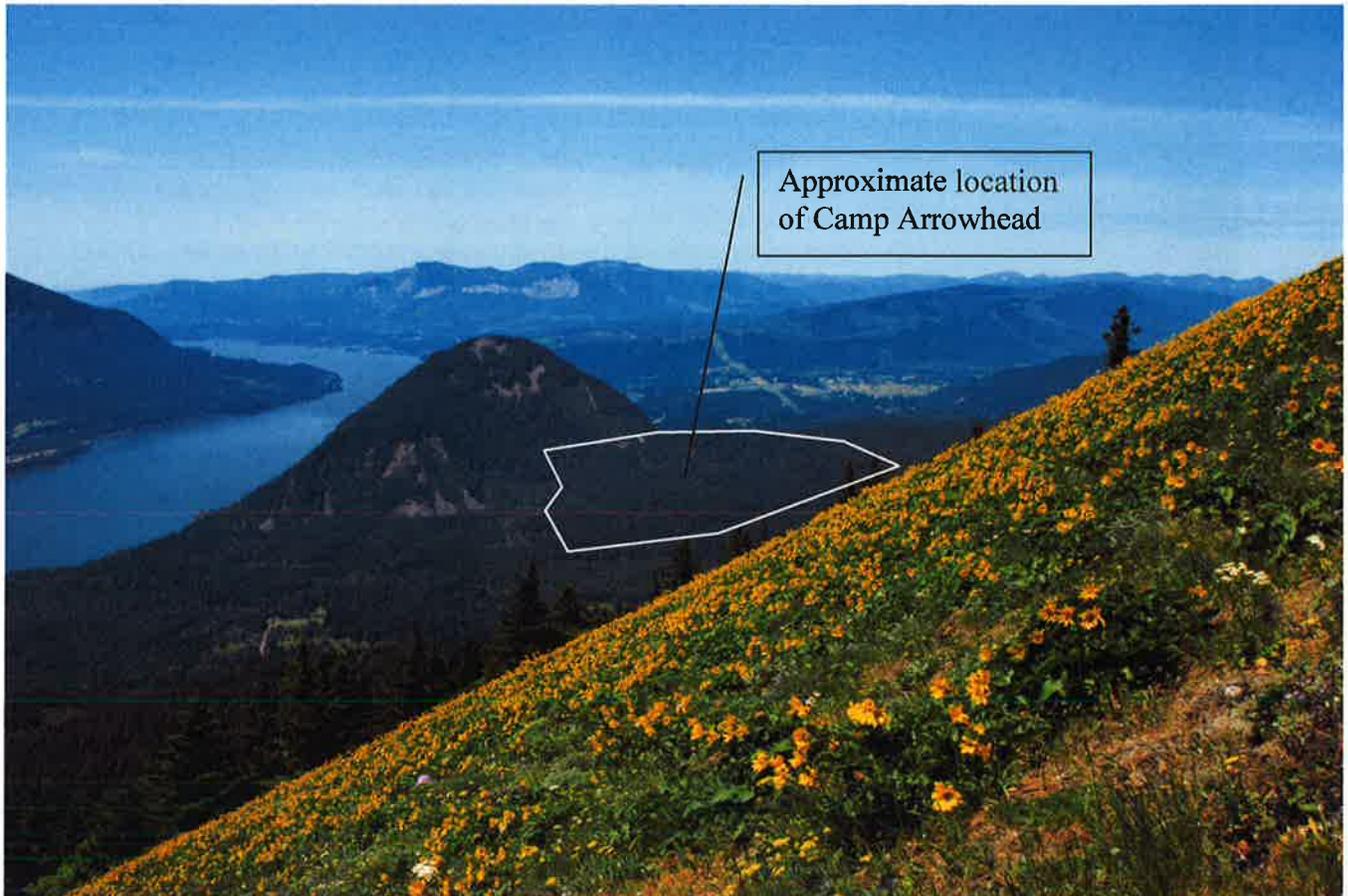
<b>KVA</b>	<b>Foreground</b>	<b>Middleground</b>	<b>Background</b>
<b>HCRH</b>			<b>X</b>
<b>I-84</b>			<b>X</b>
<b>Columbia River</b>		<b>X</b>	
<b>Dog Mountain</b>		<b>X</b>	
<b>SR-14</b>			<b>X</b>

**Visibility**

The topography is characterized by undulating hills ranging in elevation from 550-1290 feet. Proposed thinning is in lower elevation areas. The HCRH, I-84, Columbia River and SR-14 are all at low elevations, and existing forest would screen the majority of the proposed thinning from view (see Fig. 1). From this angle, selective tree removal and reduction in canopy coverage to 70% in the central and south units and 40-70% in the north unit would not be noticeable to the casual observer due to the size and configuration of the openings the existing forest screen.



**Fig. 1. View from I-84 of project area.**



**Fig. 2 Monitoring Photo taken from Dog Mountain in 2009**

The project may be visible from Dog Mountain due to aerial perspective of the view but will be Visually Subordinate. Figure 2 is a photo of from Dog Mountain taken in 2009. The landscape is dominated by coniferous trees and intermixed with hardwood species. Some past forest management activities are evident as linear features where canopy coverage changes. The proposed thinning and selective tree removal units are shaped in response to naturally occurring events (ice damage) and would retain 70% canopy coverage on two units and 40-70% canopy coverage on the northern unit. Retaining canopy coverage at these levels would retain the overall color and texture of the Coniferous Woodland landscape setting. The form of the units would not create visually dominant lines in the landscape as viewed from Dog Mountain. Incorporation of Cedar, pine and hardwood species into these units would reflect the overall natural variation in color and texture of this landscape setting. Considering the form, line, color and texture effects of the proposed activity it would meet the scenic standard of Visual Subordination as proposed.

#### **Cumulative Effects**

##### ***Potentially Adversely Affected Resource within Project Area***

The resource affected by this proposal is the Coniferous Woodland landscape setting within the viewshed of Dog Mountain.

### *Spatial Boundary*

Wind Mountain and Dog Mountain frame and separate this section of coniferous woodland as a visual unit. The coniferous woodland landscape setting between Wind Mountain and Dog Mountain are the spatial boundary for the cumulative effects to scenic resources.

### *Temporal Boundary*

As forest vegetation regenerates visible change would occur over time. For consideration of cumulative effects, the proposed harvest should take no more than 20 years to return to current visual conditions, considering the proposal would retain 40 to 70% canopy closure. The temporal boundary for analysis of cumulative effects is no more than 20 years.

### *Past Actions*

The cumulative effects analysis includes an analysis of past actions by including them in the assessment of current conditions. Current conditions within the Columbia River gorge have been impacted by innumerable actions over the last century (and beyond), and trying to isolate the individual actions that continue to have residual impacts would be nearly impossible. Providing the details of past actions on an individual basis would not be useful to predict the cumulative effects of the proposed action or alternatives. Focusing on individual actions would be less accurate than looking at existing conditions, because there is limited information on the environmental impacts of individual past actions, and one cannot reasonably identify each and every action over the last century that has contributed to current conditions. Additionally, focusing on the impacts of past human actions risks ignoring the important residual effects of past natural events, which may contribute to cumulative effects just as much as human actions. The current conditions serve as an aggregate of all past actions, so by looking at current conditions, we are sure to capture all the residual effects of past human actions and natural events, regardless of which particular action or event contributed those effects.

### *Present Actions*

Residential and recreation development; road development and maintenance; utility corridor operation; recreation operation; forest restoration; fire suppression.

### *Reasonably Foreseeable Future Actions*

Residential and recreation development; road development and operation; utility corridor operation; recreation development; SMA forest practices; forest restoration; fire suppression.

### *Cumulative Impacts*

Past and present development activities have changed the visual character of this landscape from a natural coniferous woodland to a landscape dominated by the coniferous woodland with some unnatural openings and features. These features include clearings for residential and recreation development, agriculture use, utility corridors and roads. These activities are anticipated to continue to occur. Due to NSA Management Plan restrictions these activities will likely continue to be visually subordinate to the coniferous woodland and sustain current conditions. The variable density opening in the North unit will not likely be discernable from the coniferous woodland landscape by the casual observer. The

**thinning of the central and southern units will not be noticeable to the casual observer. These effects combined with ongoing and reasonably foreseeable future actions would not contribute to the incremental modification of the integrity of the coniferous woodland. It is likely that ongoing activities will preserve the overall characteristic of the coniferous woodland as observed by the casual observer. The proposal added to past, present and reasonably foreseeable future actions would not result in cumulatively significant impacts to scenic resources.**

### **SMA Scenic Guidelines for Forest Practices**

*The Management Plan, Part II, Chapter 2 (Forest Land), SMA guidelines, states:  
(Guideline 1.X.(4)c is not applicable)*

#### **1.X.(4)**

- (a) Forest practices shall meet the design guidelines and scenic standards for the applicable landscape setting and zone (See Required SMA Scenic Standards table, SMA Guidelines for Development Visible from KVAs, SMA Scenic Resource Provisions, Part I, Chapter II).

**Findings: See findings above from SMA Scenic Resource Provisions.**

- (b) In the western portion (to White Salmon River) of the SMA Coniferous Woodland Landscape Setting, no more than 8% of the composite KVA viewshed from which the forest practice is topographically visible shall be in created forest openings at one time. The viewshed boundaries shall be delineated by the Forest Service.

**Findings: The proposed thinning would affect approximately 34 acres of Coniferous Woodland west of the White Salmon River. The project, however topographically visible from the HCRH, I-84, Columbia River and SR-14, would not contribute to created forest openings that are visible as described above. The project area is visible from Dog Mountain. The north unit would have canopy coverage between 40 and 70% (40% is the high end of canopy coverage for a created opening). All other units would maintain 70% canopy coverage and not result in an opening.**

**Based on the 2012 review for another forest practice at Camp Arrowhead (CD-12-02-S) it was estimated that the composite viewshed of the KVAs from which the project is visible in the SMA coniferous woodland within 3 miles of the project area is 3,645 acres. This area does not include agriculture, residential development or utility corridors. Within that area there are 41 acres of created forest openings currently; 1% of the delineated viewshed (including acreage of CD-12-02-S implementation). The additional 9 acres of the North unit would still result in less than 2% of the composite KVA be created forest openings.**

- (d) For all other landscape settings, created forest openings visible at one time shall be within the desired range for the vegetation type as set forth in the Natural Resources guidelines in Review Uses 1.X(5)(a)-(c) in this chapter.

- (e) Size, shape, and dispersal of created forest openings shall maintain the desired natural patterns in the landscape as set forth in the Natural Resources guidelines in Review Uses 1.X(5)(a)-(c) in this chapter.
- (f) The maximum size of any created forest opening is set forth by the “Desired” vegetation type in the forest Structure and Pattern Table. (i)-(ii)

**Findings: Consistent. See Natural Resources findings.**

- (g) Created forest openings shall not create a break or opening in the vegetation in the skyline as viewed from a key viewing area.

**Findings: The proposed thinning would not create break or opening along the skyline as viewed from key viewing areas.**

## **E. CULTURAL RESOURCES**

*The Management Plan, Part I, Chapter 2 (Cultural Resources), SMA Policies states:*

1. New developments or land uses shall not adversely affect significant cultural resources.
2. Federal agencies shall follow steps 1 through 5 under Guideline 4 below, for new developments or land uses on all federal lands, federally assisted projects, and forest practices.
7. The Forest Service shall be responsible for performing steps 1 through 5 under guideline 4 for forest practices and National Forest system lands.
8. The Forest Service shall consult with the Indian tribal governments and other consulting parties in performing steps 1 through 5 under guideline 4.

*The Management Plan, Part I, Chapter 2 (Cultural Resources), SMA Guidelines states:*

5. Determination of potential effects to significant cultural resources shall include consideration of cumulative effects of proposed developments that are subject to any of the following: 1) a reconnaissance or historic survey; 2) a determination of significance; 3) an assessment of effect; or 4) a mitigation plan. (Added: U.S. Sec. Ag. concurrence 7/1/11)

**Findings: The proposed project has been reviewed by a Forest Service archaeologist for consistency with the SMA guidelines. Tribes were included during the comment period. The archaeologist reviewed the proposed undertaking and area of potential effect as stated on the development review application with the National Scenic Area records and inventories. These inventories include the cultural resource site inventory maintained by the State Historic Preservation Office. Based upon the information provided in these inventories and the requirements of the management plan, it is recommended that no surveys be required.**

**A condition should be placed stating that should any historic or prehistoric cultural resources be uncovered during project activities, the applicant shall cease work and immediately notify the CRGNSA office and the Washington Office of Archeology and Historical Preservation. The applicant should also notify the Indian Tribal governments**

within 24 hours if the resources are prehistoric or otherwise associated with Native American Indians.

**The proposal will have no adverse effects to cultural resources; therefore, there will be no unresolved adverse cumulative effects on significant cultural resources within the Columbia River Gorge National Scenic Area.**

## **F. NATURAL RESOURCES**

*The Management Plan, Part II, Chapter 3 (Natural Resources), SMA guidelines, states:*

### **WATER RESOURCES (WETLANDS, STREAMS, PONDS, LAKES, AND RIPARIAN AREAS)**

#### *SMA Guidelines*

1. All new developments and uses, as described in a site plan prepared by the applicant, shall be evaluated using the following guidelines to ensure that natural resources are protected from adverse effects. Comments from state and federal agencies shall be carefully considered. (Site plans are described under “Review Uses” in Part II, Chapter 7: General Policies and Guidelines.)
2. Water Resources (Wetlands, Streams, Ponds, Lakes, and Riparian Areas)  
(guidelines B-H are not applicable)
  - A. All Water Resources shall, in part, be protected by establishing undisturbed buffer zones as specified in 2.A.(2)(a) and 2(b) below. These buffer zones are measured horizontally from a wetland, stream, lake, or pond boundary as defined below.
    - (1) All buffer zones shall be retained undisturbed and in their natural condition, except as permitted with a mitigation plan.
    - (2) Buffer zones shall be measured outward from the bank full flow boundary for streams, the high water mark for ponds and lakes, the normal pool elevation for the Columbia River, and the wetland delineation boundary for wetlands on a horizontal scale that is perpendicular to the wetlands, stream, pond or lake boundary. On the main stem of the Columbia River above Bonneville Dam, buffer zones shall be measured landward from the normal pool elevation of the Columbia River. The following buffer zone widths shall be required:
      - (a) A minimum 200 foot buffer on each wetland, pond, lake, and each bank of a perennial or fish bearing stream, some of which can be intermittent.
      - (b) A 50-foot buffer zone along each bank of intermittent (including ephemeral), non-fish bearing streams.
      - (c) Maintenance, repair, reconstruction and realignment of roads and railroads within their rights-of-way shall be exempted from the wetlands and riparian guidelines upon demonstration of all of the following:

**Findings: The proposed forest practice activities are close to the 200’ buffer of an unnamed pond near the central unit. In order for the project to meet riparian buffer**

**guidelines work should not occur within the 200' buffer of the pond in the northeast corner of the central unit.**

**The hydrology of the Collins Point slide area is dynamic and new wet areas may develop. In recognition of this, should any new wet areas be identified during implementation, the applicant should contact the Forest Service to identify ways to avoid or mitigate work within the riparian area and its buffer.**

### 3. Wildlife and Plants

A. Protection of sensitive wildlife/plant areas and sites shall begin when proposed new developments or uses are within 1000 ft of a sensitive wildlife/plant site and/or area.

Sensitive Wildlife Areas are those areas depicted in the wildlife inventory and listed in Table 2, including all Priority Habitats listed in this Chapter. The approximate locations of sensitive wildlife and/or plant areas and sites are shown in the wildlife and rare plant inventory.

**Findings: The proposed activity is within 1000 feet of Northern Spotted Owl Nesting and Roosting habitat, Oregon white oak and Snags and Logs Priority Habitats.**

B. The local government shall submit site plans (of uses that are proposed within 1,000 feet of a sensitive wildlife and/or plant area or site) for review to the Forest Service and the appropriate state agencies (Oregon Department of Fish and Wildlife or the Washington Department of Wildlife for wildlife issues and by the Oregon or Washington Natural Heritage Program for plant issues).

C. The Forest Service wildlife biologists and/or botanists, in consultation with the appropriate state biologists, shall review the site plan and their field survey records. They shall:

- (1) Identify/verify the precise location of the wildlife and/or plant area or site,
- (2) Determine if a field survey will be required,
- (3) Determine, based on the biology and habitat requirements of the affected wildlife/plant species, if the proposed use would compromise the integrity and function of or result in adverse effects (including cumulative effects) to the wildlife or plant area or site. This would include considering the time of year when wildlife or plant species are sensitive to disturbance, such as nesting and rearing seasons, or flowering season, and
- (4) Delineate the undisturbed 200 ft buffer on the site plan for sensitive plants and/or the appropriate buffer for sensitive wildlife areas or sites, including nesting, roosting and perching sites. (a-c)

D. The local government, in consultation with the State and federal wildlife biologists and/or botanists, shall use the following criteria in reviewing and evaluating the site plan to ensure that the proposed developments or uses do not compromise the integrity and function of or result in adverse affects to the wildlife or plant area or site:

- (1) Published guidelines regarding the protection and management of the affected wildlife/plant species. Examples include: the Oregon Department of Forestry has prepared technical papers that include management guidelines for osprey and great blue heron; the Washington Department of Wildlife has prepared similar guidelines for a variety of species, including the western pond turtle, the peregrine falcon, and the Larch Mountain salamander.

- (2) Physical characteristics of the subject parcel and vicinity, including topography and vegetation.
- (3) Historic, current, and proposed uses in the vicinity of the sensitive wildlife/plant area or site.
- (4) Existing condition of the wildlife/plant area or site and the surrounding habitat and the useful life of the area or site.
- (5) In areas of winter range, habitat components, such as forage and thermal cover, important to the viability of the wildlife must be maintained or, if impacts are to occur, enhancement must mitigate the impacts so as to maintain overall values and function of winter range.
- (6) The site plan is consistent with the "Oregon Guidelines for Timing of In-Water Work to Protect Fish and Wildlife Resources" (Oregon Department of Fish and Wildlife 2000) and the Washington guidelines when they become finalized.
- (7) The site plan activities coincide with periods when fish and wildlife are least sensitive to disturbance. These would include, among others, nesting and brooding periods (from nest building to fledgling of young) and those periods specified.

**Findings: The project area is within suitable (nesting/roosting) northern spotted owl habitat and no surveys to protocol have been done in many years to determine spotted owl occupancy. In order to minimize adverse effects to potential nesting owls from noise disturbance:**

- **In the North and Central Units: no chainsaw or heavy equipment work should occur between March 1 and July 15**
- **In the South Unit: no chainsaw or heavy equipment work should occur between April 1 and July 15.**

- (8) The site plan illustrates that new developments and uses, including bridges, culverts, and utility corridors, shall not interfere with fish and wildlife passage.
- (9) Maintain, protect, and enhance the integrity and function of Priority Habitats (such as old growth forests, talus slopes, and oak woodlands) as listed on the following Priority Habitats Table. This includes maintaining structural, species, and age diversity, maintaining connectivity within and between plant communities, and ensuring that cumulative impacts are considered in documenting integrity and function.

**Findings: The southern unit is within close proximity to Oregon white oak woodland priority habitat. No oaks are proposed for removal; however, to protect the presence of Oregon oak, the project a condition should be made that Oregon white oak trees are avoided to maximum extent practicable.**

**Snags and Logs are present throughout the project area. As described in the application and Forest Stewardship plan snags and down logs will be retained unless they conflict with forest health and camp safety objectives.**

Priority Habitats Table	
Priority Habitats	Criteria
Aspen stands	High fish and wildlife species diversity, limited availability, high vulnerability to habitat alteration.
Caves	Significant wildlife breeding habitat, limited availability, dependent species.
Old-growth forest	High fish and wildlife density, species diversity, breeding habitat, seasonal ranges, and limited and declining availability, high vulnerability.
<b>Oregon white oak woodlands</b>	<b>Comparatively high fish and wildlife density, species diversity, declining availability, high vulnerability.</b>
Prairies and steppe	Comparatively high fish and wildlife density, species diversity, important breeding habitat, declining and limited availability, high vulnerability.
Riparian	High fish and wildlife density, species diversity, breeding habitat, movement corridor, high vulnerability, dependent species.
Wetlands	High species density, high species diversity, important breeding habitat and seasonal ranges, limited availability, high vulnerability.
<b>Snags and logs</b>	<b>High fish and wildlife density, species diversity, limited availability, high vulnerability, dependent species.</b>
Talus	Limited availability, unique and dependent species, high vulnerability.
Cliffs	Significant breeding habitat, limited availability, dependent species.
Dunes	Unique species habitat, limited availability, high vulnerability, dependent species.

E. The wildlife/plant protection process may terminate if the local government, in consultation with the Forest Service and state wildlife agency or Heritage program, determines (1) the sensitive wildlife area or site is not active, or (2) the proposed use is not within the buffer zones and would not compromise the integrity of the wildlife/plant area or site, and (3) the proposed use is within the buffer and could be easily moved out of the buffer by simply modifying the project proposal (site plan modifications). If the project applicant accepts these recommendations, the local government shall incorporate them into its development review order and the wildlife/plant protection process may conclude.

(Guidelines F-H are not applicable)

I. Determination of potential natural resources effects shall include consideration of cumulative effects of proposed developments within the following areas: 1) sites within 1,000 feet of sensitive wildlife areas and sites; and 2) sites within 1,000 feet of rare plants. (Added: U.S. Sec. Ag. concurrence 7/1/11)

**Findings:** The proposed activities have been evaluated by Forest Service biologists in consultation with Washington Department of Fish and Wildlife. It was determined that the project would not reduce the integrity and function of or result in adverse effects to the wildlife or plant area or site provided the mitigation measures are implemented.

### **Cumulative Effects**

#### ***Potentially Adversely Affected Resource within Project Area***

There are no potential adverse effects from this or similar projects in this watershed providing mitigations, such as timing restrictions for northern spotted owls, are implemented.

#### ***Spatial Boundary***

The Collins Point slide is a distinct geologic feature which has created a unique hydrologic regime and habitat in the Collins Slide area. The spatial boundary for cumulative effects is the watershed bounding the Collins Slide area (i.e. the area bounded by Wind Mountain, Dog Mountain, Columbia Mainstem, and escarpments to the north).

#### ***Temporal Boundary***

It would likely take 80 years for the forest to regenerate to its original habitat conditions after any forest disturbance from most forest practice proposals. The temporal boundary for analysis of cumulative effects should be 80 years.

#### ***Past Actions***

The cumulative effects analysis includes an analysis of past actions by including them in the assessment of current conditions. Current conditions within the Columbia River gorge have been impacted by innumerable actions over the last century (and beyond), and trying to isolate the individual actions that continue to have residual impacts would be nearly impossible. Providing the details of past actions on an individual basis would not be useful to predict the cumulative effects of the proposed action or alternatives. Focusing on individual actions would be less accurate than looking at existing conditions, because there is limited information on the environmental impacts of individual past actions, and one cannot reasonably identify each and every action over the last century that has contributed to current conditions. Additionally, focusing on the impacts of past human actions risks ignoring the important residual effects of past natural events, which may contribute to cumulative effects just as much as human actions. The current conditions serve as an aggregate of all past actions, so by looking at current conditions, we are sure to capture all the residual effects of past human actions and natural events, regardless of which particular action or event contributed those effects.

#### ***Present Actions***

Residential and recreation development; road development and maintenance; utility

corridor operation; recreation operation; forest restoration; fire suppression.

*Reasonably Foreseeable Future Actions*

Residential and recreation development; road development and operation; utility corridor operation; recreation development; SMA forest practices; forest restoration; fire suppression.

*Cumulative Impacts*

Past and present development activities have changed the upland, riparian, Douglas Fir, Oregon oak and sensitive species (i.e. northern spotted owl, western pond turtle, Larch Mountain salamander) habitat to a system where natural process such as fire and channel migration are limited by development and fire suppression activities and forest structure has been modified by development and forest management. These developments and management strategies are anticipated to continue to occur at the current levels without much expansion. Thinning of the forest may contribute incrementally to the level of human disturbance within these habitat types but would ultimately expedite forest structural development; contributing to the enhancement of upland, riparian, Douglas Fir, Oregon oak and sensitive species habitat integrity. The proposal added to past, present and reasonably foreseeable future actions would not result in significant cumulative impacts to natural resources.

4. Soil Productivity

A. Soil productivity shall be protected using the following guidelines:

- (1) A description or illustration showing the mitigation measures to control soil erosion and stream sedimentation.
- (2) New developments and land uses shall control all soil movement within the area shown on the site plan.
- (3) The soil area disturbed by new development or land uses, except for new cultivation, shall not exceed 15 percent of the project area.
- (4) Within 1 year of project completion, 80 percent of the project area with surface disturbance shall be established with effective native ground cover species or other soil-stabilizing methods to prevent soil erosion until the area has 80 percent vegetative cover.

**Findings:** In order to meet these guidelines, all disturbed soil be vegetated by seed or planting to achieve 80% native ground cover within 1 year of project implementation. Provided this guideline is met the proposal is consistent with soil productivity guidelines.

Additional clarification was provided by the applicant on the method of wood removal and should be incorporated as a condition of approval as it provides clarity on effects to soil productivity:

Trees removed as part of the thinning project should be felled, de-limbed, and bucked with a chainsaw, then pre-bunched to designated skid trails by a small, track mounted excavator and skidded out with a rubber-tired skidder or a dozer. Logs should be loaded onto log trucks at designated landings and sent to the appropriate mill or log yard via Girl Scout Road/Bergen Road and WA State Highway 14.

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### **SMA Natural Resource Guidelines for Forest Practices**

*The Management Plan, Part II, Chapter 2 (Forest Land), SMA guidelines, states:*

(5) Forest practices shall maintain the following in addition to applicable natural resources guidelines in Part I, Chapter 3, SMA Natural Resources:

(a) Silvicultural prescriptions shall maintain the desired natural forest stand structures (tree species, spacing, layering, and mixture of sizes) based on forest health and ecosystem function requirements. Forest tree stand structure shall meet the requirements listed in the Desired Forest Structure and Pattern Table for each vegetation type. Forest tree stand structure is defined as the general structure of the forest in each vegetation type within which is found forest openings.

**Findings:** The following table addresses the applicable standards for the West Conifer forest type identified in the Desired Forest Structure and Pattern Table.

		<b>MP Requirements</b>	<b>Proposed</b>	<b>Finding</b>
<b>West Conifer</b>	<b>Forest Structure (Average % total canopy closure (cc))</b>	<b>60-80% canopy closure, Understory layer variable (0-60% of total cc)</b>	<b>≥ 70% average total canopy Closure in Central and South units</b>	<b>Consistent</b>
	<b>Forest Openings</b>	<b>Retain forested character. Allow openings up to 15 acres (up to 5 acres in the foreground of KVAs) Openings retain 15-40% canopy closure</b>	<b>North unit: 9 acres of Variable density with 40-70% canopy closure</b>	<b>Consistent, not in foreground of KVA</b>
	<b>Leave Trees</b>	<b>Leave 15% of existing trees per acre throughout opening and in clumps Include 3 trees per acre of the largest size trees available (Includes all available remnant old forest)</b>	<b>All units would retain at least 30% of existing trees/ acre averaged across each unit. Thinning is proposed from below (remove smaller trees) except for small group selection in the North unit for safety and forest health.</b>	<b>Consistent</b>
	<b>Average Down Wood</b>	<b>18- 25 pieces greater than 20” dbh (Pieces 30 ft long per acre (scattered))</b>	<b>Of the logs that have come down since 2012, 1-2 logs/ acre of greater than 14” diameter would be left.</b>	<b>Addressed in application and Stewardship Plan</b>
	<b>Average Snags</b>	<b>10 snags at 10”-20” dbh, and 7 snags greater than 20” dbh ((Conifers) No. per acre Snags are 20-40 ft in height)</b>	<b>Snags will be preserved where they do not conflict with forest health objectives and camp/ operator safety.</b>	<b>Addressed in application and Stewardship Plan</b>

- (b) Created forest openings shall be designed as mosaics not to exceed the limits defined as Desired in the Desired Forest Structure and Pattern Table unless proposed as a deviation as allowed under the scenic resource guideline in Review Uses 1.X.(4)(f).
- (c) Snag and down wood requirements shall be maintained or created as listed in the Desired Forest Structure and Pattern Table for each vegetation type.
- (d) If the treatment is proposed to deviate from the snag and down wood requirements based on forest health or ecosystem function requirements, a Stewardship Plan shall be required and shall show and prove why a deviation from the snag and down wood requirements is required.

**Findings: Snag and down wood requirements will not be met immediately in these units, however the proposed forest practice is designed to improve long term vigor of the forest which will ultimately develop more snags and down wood. A forest stewardship plan was developed in 2009 and addresses some of these issues. Additional information was included in the application which articulates Laminated root rot and the Douglas-fir beetle require removal of some snags and down wood to sustain the long term vigor of the forest. The proposal has been developed in consultation with Forest Service specialists to manage for forest health. Recognizing this and the value of snags it should be made a condition of approval that as many of the dead trees as possible should be left in place as snags, when they do not conflict with the intent to control Laminated root rot and provide a safe environment.**

## **G. RECREATION RESOURCES**

(Guidelines 3, 5-9 are not applicable and not included)

*The Management Plan, Part II, Chapter 4 (Recreation Resources), SMA guidelines, state:*

1. New developments and land uses shall not displace existing recreational use.
2. Recreation resources shall be protected from adverse effects by evaluating new developments and land uses as proposed in the site plan. An analysis of both onsite and offsite cumulative effects shall be required.
4. Mitigation measures shall be provided to preclude adverse effects on the recreation resource.

**Findings: The project area is within Recreation Intensity Class 1. There is no recreation development proposed. The proposed forest practice would not cause adverse effects to recreation resources including cumulative effects.**

## **H. CONCLUSION**

**The proposed Forest Practice at Camp Arrowhead is consistent with the National Scenic Area Management Plan Policy and Guidelines provided they meet the criteria and conditions listed in the Findings of Fact and Consistency Determination.**