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**CRGNSA CONSISTENCY DETERMINATION  
COMBELIC FOREST PRACTICE, CD-11-08-S  
JIM COMBELIC IN BEHALF OF MILTON REEVE  
COLUMBIA RIVER GORGE NATIONAL SCENIC AREA  
SKAMANIA COUNTY, WASHINGTON**

**BACKGROUND**

The proposed Forest Practice by Jim Combelic 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 September 2011.

**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-11-08-S, and provided the following conditions are applied. This may be considered the review statement for the Washington Department of Natural Resources.

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. No work shall be completed within 50 feet of the ephemeral stream with the exception of approximately 4 snags on the East side of the swale near the top of the slope.
3. In order to maintain the conditions of the talus slope, no work shall be done within 100 feet of these areas. No logs shall be dragged across or equipment operated on the two talus areas.
4. No more than 15% of the project area shall be disturbed soil.
5. Areas with disturbed soil shall be re-vegetated with native species.
6. Water bars should be created on all skid roads as needed every 100 feet to prevent soil erosion.
7. The following shall occur for this proposal:
  - a) Leave 5 of the largest trees per acre untouched.
  - b) Leave all existing snags and down wood.
  - c) Creation of snags as needed to achieve an average of 2 snags per acre. Existing snags must be greater than 10" dbh and 20 feet in height. Created snags must be of the larger size class, greater than 20 feet in height and have sound root systems.

- d) Create an average of 1 tree per acre for down wood, in addition to existing down wood. Down wood shall be created from the larger size class and left in lengths no shorter than 30 feet.
8. The following shall be incorporated into the Stewardship Plan as a condition of approval. The intent of these conditions is to guide future forest practices on this property:
- a) Of the 5 largest trees per acre retained, 3 should be retained in perpetuity. The remaining 2 will be reserved for future snag and down wood creation in future proposals when the trees will have reached a more mature size.
- b) Successive forest practices, as per the Stewardship Plan, should continue to recruit dead and down wood to meet requirements, which when based on largest tree size available, will result in increasingly larger trees for down wood and snags.

#### Other Requirements

1. It is the responsibility of the landowner to ensure activities do not trespass on other landownerships.
2. It is the applicant's responsibility to get all necessary authorizations for hauling on roads, including roads on National Forest System lands.

#### 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 1-8 and 1-2 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).

  
LYNN BURDITT

April 12, 2012

Date

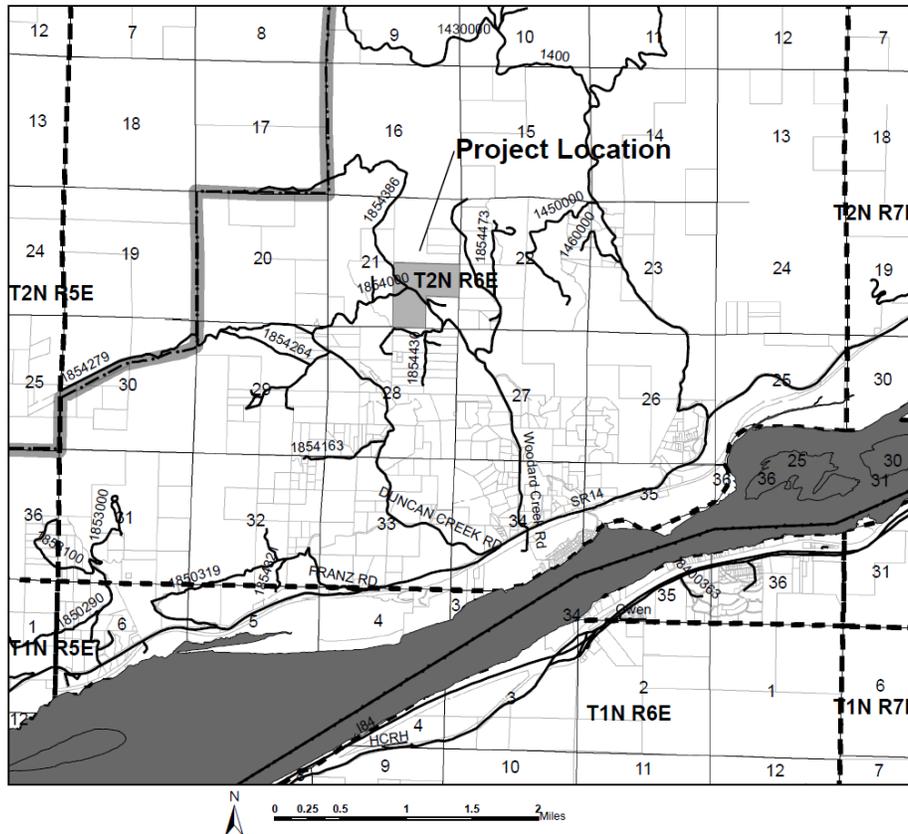
Area Manager

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## FINDINGS OF FACT

<b>LANDOWNER:</b>	<b>Reeve Resources, LLC c/o Jim Combelic</b>
<b>PROPOSED ACTION:</b>	<b>Forest Practice</b>
<b>LOCATION:</b>	<b>Township 2N, Range 6E, Section 21</b> <b>Tax lot ID: 02062100050000</b> <b>UTM: 438705.863, 1288320.352</b>
<b>NATIONAL SCENIC AREA DESIGNATION:</b>	<b>Special Management Area</b>
<b>LAND USE DESIGNATION:</b>	<b>Forest</b>
<b>LANDSCAPE SETTING</b>	<b>Coniferous Woodland</b>

Combelic Forest Practice, CD-11-08-S



LEGEND			
	Roads		CRGNSA Boundary
	CombelicFP2011		Township_Range
	Lakes and Rivers		Section Lines

This map was produced by the Columbia River Gorge National Scenic Area (CRGNSA). It is compiled from many different data sources. The CRGNSA is not responsible for the use or misuse of any information represented here. For additional information contact the Columbia River Gorge National Scenic Area office at: (541) 308-1700.

## 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 February 27, 2012. A period of 30 days was allowed for public comment. Four letters were received during the public comment period. The Washington Department of Fish and Wildlife commented regarding the presence or absence of a stream, the protection of talus slopes, retention of existing habitat features and design for next boxes and snag cavity creation. The Washington Department of Natural Resources comments indicated concern over marking a sample area for review, DNR forest practice road standards and average down wood and snag deviating from requirements. The Friends of the Columbia Gorge submitted comments regarding meeting NEPA, the applicable management plan guidelines and application standards, including a stewardship plan. The appropriate guidelines are addressed in these findings of fact. The application materials are adequate for review. A member of the Gifford Pinchot Accountability Group expressed full support of the proposal.

### B. PROJECT PROPOSAL

The applicant proposes a forest practice on approximately 120 acres of private land in Skamania County. The stands proposed for thinning are 55 to 60 year old stands of Douglas Fir and Douglas fir, hardwood mix. No major road construction would be required. The applicant would retain 60% canopy closure and is not proposing any patch openings. Refer to application submitted for review, as updated on January 11, 2012, for a complete project description.

### 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. Resource specific 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 proposal is within the Coniferous Woodland landscape setting. No buildings or non-native plant species are proposed.**

### SMA Design Guidelines for Sites Topographically Visible from KVAs

(Guidelines 4, 8, 9, 10, 11, 12, 13 and 14 are not applicable and not included)

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:

Required SMA Scenic Standards		
LANDSCAPE SETTING	LAND USE DESIGNATION	SCENIC STANDARD
Coniferous Woodland, Oak-Pine Woodland	Forest, Agriculture, Residential, Public Recreation	Visually Subordinate

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.

**Findings:** The required scenic standard is **Visually Subordinate to the surrounding to the natural landscape.**

**Visually Subordinate:** *A description of the relative visibility of a structure or use where that structure or use does not noticeably contrast with the surrounding landscape... Visually subordinate forest practices in the SMA shall repeat form, line, color, or texture common to the natural landscape, while changes in their qualities of size, amount, intensity, direction, pattern, etc., shall not dominate the natural landscape setting. (MP-Glossary 20)*

The proposal is topographically visible from the following KVAs:

KVA	Foreground	Middleground	Background
HCRH		X	X
I-84		X	X
SR-14		X	
Beacon Rock		X	
Columbia River		X	X
Multnomah Falls			X
Larch Mountain Rd			X
Sherrard Point			X

*Viewer Perspective*

The proposed harvest is located on a relatively flat parcel at approximately 1200 feet elevation. This is approximately 1000 feet above the gorge floor. The angle at which the property would be viewed from lower elevation KVAs and the surrounding coniferous vegetation would screen the property from view almost entirely. As viewed from upper elevation KVAs, such as Sherrard Point, the harvest units would not be screened. The closest direct view is from Beacon Rock (~ 2.5 miles) and the furthest direct view is from Larch Mountain (~ 7 miles).

The parcel is topographically visible only from the middle ground and background of KVAs. As seen from these distances canopy coverage is the primary element which has potential to contrast with the surrounding natural landscape. The proposed harvest would affect the form, line, color, and texture of canopy coverage as seen from the KVAs in the following ways.

LANDSCAPE ELEMENT	NATURAL	EXISTING	AFTER TREATMENT	DEGREE CHANGE (From Natural)
LANDSCAPE PATTERN (as viewed from middleground and background)	CONTINUOUS CANOPY of evergreen trees with patches of deciduous and with large opening mosaics moving across the landscape over time. Very small openings scattered throughout.	CONTINUOUS CANOPY Subject property is continuous canopy. Larger landscape is fragmented with smaller created openings and linear clearings; which are inconsistent with what natural disturbance would have created.	CONTINUOUS CANOPY (minimal change from existing)	MINIMAL (due to existing conditions and treatments)

*Texture*

As observed from the middleground and foreground texture is affected by species type, size and density. The existing conditions of the forest are primarily Douglas fir over story that is somewhat irregular in density with patches of deciduous vegetation. 60% canopy cover will be retained after this harvest and the predominant species type would be retained. While the size and density of stands may change it would not result in the units contrasting with the surrounding natural landscape.

*Color*

Color of the forest canopy will not be changed by this forest practice. Native species would remain in the current patch configuration.

### ***Form & Line***

**As viewed from the middleground and background visible forms are created by patches of canopy types. The harvest would retain the texture and color to such an extent that it may only be slightly evident from the surrounding forest. Due to the retention of the color and texture of the surrounding forest no evident form or line would be created.**

**Considering the texture, color, form and line the proposal would be Visually Subordinate to all Key Viewing Areas. There are no adverse consequences to scenic resources.**

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: See Natural and Cultural Resource sections.**

### **SMA Guidelines for Areas Not Seen from KVAs (not applicable and not included)**

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

*The Management Plan, Part II, Chapter 2 (Forest Land), SMA guidelines, 1.X.(4) states:*

- (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).
- (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.
- (c) In the western portion (to White Salmon River) of the SMA Gorge Walls, Canyonlands and Wildlands Landscape Setting, no more than 4% 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.
- (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)
- (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 Management Plan defines a created opening as:**

*Created Opening (SMA): A created forest opening with less than 40 percent average canopy closure of overstory trees and less than 60 percent average canopy closure of understory trees averaging less than 5 inches diameter at breast height for coniferous forests... This definition does not include agricultural fields.*

The proposal would retain 60% canopy cover. There would be no created openings as part of this proposal. 60% canopy closure is the minimum required by the management plan in the *Desired Forest Structure and Pattern* table for West Conifer vegetation type.

## Cumulative Effects

### *Affected Resource*

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

### *Spatial Boundary*

Hamilton Mountain and Archer Mountain frame and separate this section of coniferous woodland as a visual unit. The coniferous woodland landscape setting between Hamilton Mountain and Archer Mountain are the spatial boundary for the cumulative effects to scenic resources. (A map of this boundary is available in the project record)

### *Temporal Boundary*

As forest vegetation regenerates visible change would occur over time. For consideration of cumulative effects, the proposed harvest would likely take no more than 30 years to return to current visual conditions. The temporal boundary for analysis of cumulative effects is no more than 30 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 development; road development and maintenance; utility corridor operation; recreation operation; fire suppression.

### *Reasonably Foreseeable Future Actions*

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

The coniferous woodland in this viewshed is approximately 10,965 acres in size. There are no reasonably foreseeable future forest practice actions in this area on public land (state and federal). Of this area 20% is in private ownership, of which it is uncertain what actions will be proposed. Of the viewshed approximately 9% is private ownership in GMA, not including parcels which went through the 8(o) process of the Act. Private property would still need to go through either the DNR Forest Practice review process and/or the CRGNSA review process. Projects which go through the CRGNSA review would be required to meet the scenic standard as outlined by the management plan.

### *Cumulative Impacts*

Past and present development activities have changed the visual character of this landscape from a natural coniferous woodland to landscape dominated by the coniferous woodland with some unnatural openings and features. These features include clearings for residential 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 proposal will not create any new openings, meets the scenic standard, and has no adverse consequences to scenic resources. The project, combined with any future thinning projects, would not contribute to an incremental modification of the integrity of the coniferous woodland. This proposal combined with all existing and reasonably foreseeable future actions would not result in cumulative significant impacts to scenic resources.

## **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 proposal was reviewed by Forest Service Archaeologist Marge Dryden. A field survey was required and completed. No prehistoric or historic-period archaeological resources were found. The proposal will have no adverse affects to cultural resources.**

**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.**

*Cumulative Impacts*

**The proposal will have no adverse affects 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), Wildlife and Plant SMA guidelines, states:*

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) (Guideline 2D not applicable and not included)
  - 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 ...
      - (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.

B. When a buffer zone is disturbed by a new use, it shall be replanted with only native plant species of the Columbia River Gorge.

**Findings: Only native species would be used to revegetate.**

C. The applicant shall be responsible for identifying all water resources and their appropriate buffers.

E. Stream, pond, and lake boundaries shall be delineated using the bank full flow boundary for streams and the high water mark for ponds and lakes. The project applicant shall be responsible for determining the exact location of the appropriate boundary for the water resource.

F. The local government may verify the accuracy of, and render adjustments to, a bank full flow, high water mark, normal pool elevation (for the Columbia River), or wetland boundary delineation. If the adjusted boundary is contested by the project applicant, the local government shall obtain professional services, at the project applicant's expense, or the local government will ask for technical assistance from the Forest Service to render a final delineation.

**Findings: The applicant identified a stream in the DNR database as non-existent in their application. A Forest Service ecologist and hydrologist reviewed the stream during a field visit and determined that there is a stream channel that flows ephemerally.**

G. Buffer zones shall be undisturbed unless the following criteria have been satisfied:

(1) The proposed use must have no practicable alternative as determined by the practicable alternative test.

Those portions of a proposed use that have a practicable alternative will not be located in wetlands, stream, pond, lake, and riparian areas and/or their buffer zone.

(2) Filling and draining of wetlands shall be prohibited with exceptions related to public safety or restoration/enhancement activities as permitted when all of the following criteria have been met:

(a) A documented public safety hazard exists or a restoration/ enhancement project exists that would benefit the public and is corrected or achieved only by impacting the wetland in question, and

(b) Impacts to the wetland must be the last possible documented alternative in fixing the public safety concern or completing the restoration/enhancement project, and

(c) The proposed project minimizes the impacts to the wetland.

(3) Unavoidable impacts to wetlands and aquatic and riparian areas and their buffer zones shall be offset by deliberate restoration and enhancement or creation (wetlands only) measures as required by the completion of mitigation plan.

**Findings: The stream channel identified by Forest Service specialists has been reviewed and determined to be a non-fish bearing ephemeral stream. Ephemeral streams have a 50 foot buffer. Potentially adverse consequences to water resources have been reduced to a negligible level through the application of the No Practicable Alternative Test and the use of established mitigation measures. The Practicable Alternative Test is addressed towards the end of this section.**

H. Determination of potential natural resources effects shall include consideration of cumulative effects of proposed developments within the following areas: wetlands, streams, ponds, lakes, riparian areas and their buffer zones. *(Added: U.S. Sec. Ag. concurrence 7/1/11)*

**Findings: Cumulative Effects are addressed at the end of this section.**

**Wildlife and Plants (Guideline 2.D not applicable and not included)**

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.

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 proposal is within 1,000 feet of two known talus slopes. Talus slopes are a Priority Habitat. Potentially adverse consequences to talus slopes have been reduced to a negligible level through the application of the following mitigations. In order to maintain the conditions of the talus slope, no work should be done within 100 feet of or in these areas. No logs should be dragged across or equipment operated on the two talus areas.**

**There are no other sensitive plants or wildlife sites/ areas within 1,000 feet of the project area and there are no adverse consequences to these resources.**

**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: Water bars should be created on all skid roads as needed every 100 feet to prevent soil erosion. Areas with disturbed soil should be re-vegetated with native species. No more than 15% of the project area should be disturbed soil.**

### **Practicable Alternative Test**

1. An alternative site for a proposed use shall be considered practicable if it is available and the proposed use can be undertaken on that site after taking into consideration cost, technology, logistics, and overall project purposes.

A practicable alternative does not exist if a project applicant satisfactorily demonstrates all of the following:

A. The basic purpose of the use cannot be reasonably accomplished using one or more other sites in the vicinity that would avoid or result in less adverse effects on wetlands, ponds, lakes, riparian areas, wildlife or plant areas and/or sites.

B. The basic purpose of the use cannot be reasonably accomplished by reducing its proposed size, scope, configuration, or density, or by changing the design of the use in a way that would avoid or result in less adverse effects on wetlands, ponds, lakes, riparian areas, wildlife or plant areas and/or sites.

C. Reasonable attempts were made to remove or accommodate constraints that caused a project applicant to reject alternatives to the proposed use. Such constraints include inadequate infrastructure, parcel size, and land use designations. If a land use designation or recreation intensity class is a constraint, an applicant must request a Management Plan amendment to demonstrate that practicable alternatives do not exist.

**Findings: The basic purpose of this proposal is to grow timber commercially and harvest periodically with an emphasis on conservation of natural resources. Timber can be harvested commercially throughout the rest of the property and it is not necessary for this work to occur within the buffer zone. Trees within the buffer zone may be used to account for the largest trees per acre retained and the creation of approximately 4 snags on the East side of the swale near the top of the slope.**

**No work should be completed within 50 feet of the ephemeral stream with the exception of approximately 4 snags on the East side of the swale near the top of the slope. A map is available in the project record.**

### **Mitigation Plan**

1. Mitigation Plans shall be prepared when:

A. The proposed development or use is within a buffer zone (wetlands, ponds, lakes, riparian areas, wildlife or plant areas and/or sites).

B. There is no practicable alternative (see the “practicable alternative” test). (Requirements B-H is not applicable)

**Findings: The mitigation plan has been reviewed, and with the proposed mitigations and conditions, there are no adverse consequences to a sensitive wildlife/plant area or sites. No work would occur within the buffer with the exception of snag creation. No further mitigation is required for the creation of approximately 4 snags within the buffer zone, as snags are a resource enhancement.**

## **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.
  - (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: The Management Plan requires the following for West Conifer vegetation type.**

**Snags: 10 snags at 10''-20'' dbh and 7 snags larger than 20'' dbh per acre.**

**Down Wood: 18 pieces greater than 20'' diameter and 30'.**

**The Management Plan desired snag and down log numbers are based on the conditions present in unmanaged natural stands at maturity. The Management Plan defines old growth as a tree 180 years old or more. The applicant describes the subject stands as 55 to 60 years old and likely regrowth after a fire. The applicant does not identify how much snags and down wood exists, however Forest Service specialists, upon site visits determined that the stands were lacking in dead and down.**

**Creation of snags and down wood to meet the Management Plan requirements in one treatment with this stand would result in a large volume of small diameter (less than 20'' dbh) down wood and snags. The MP requires down wood over 20'' due to the length of time it takes to decay and habitat values.**

**Considering the current size class and the desire to recruit larger snags and down wood in the future, the applicant should be required to partially meet the snag and down wood requirements in this entry with the expectation that future forest practices would require more dead wood creation. A higher number of large tree retention is required out of recognition that these trees will be used for dead wood creation in the future.**

**The following should be made a condition of approval for this proposal:**

- e) Leave 5 of the largest trees per acre untouched.**
- f) Leave all existing snags and down wood.**

- g) Creation of snags as needed to achieve an average of 2 snags per acre. Existing snags must be greater than 10" dbh and 20 feet in height. Created snags must be of the larger size class, greater than 20 feet in height and have sound root systems.
- h) Create an average of 1 tree per acre for down wood, in addition to existing down wood. Down wood should be created from the larger size class and left in lengths no shorter than 30 feet.

The following should be incorporated into the Stewardship Plan as a condition of approval. The intent of these conditions is to guide future forest practices on this property:

- c) Of the 5 largest trees per acre retained, 3 should be retained in perpetuity. The remaining 2 will be reserved for future snag and down wood creation in future proposals when the trees will have reached a more mature size.
- d) Successive forest practices, as per the Stewardship Plan, should continue to recruit dead and down wood to meet requirements, which when based on largest tree size available, will result in increasingly larger trees for down wood and snags.

These conditions in addition to natural tree mortality the proposal would move towards the Desired Forest Structure and Pattern Table requirements.

## **Cumulative Effects**

### *Affected Resource*

The resource affected by this proposal is the talus and riparian habitats in the Woodard Creek and Duncan Creek Watersheds.

### *Spatial Boundary*

The Woodard Creek and Duncan Creek Watershed areas within the CRGNSA are the spatial boundary.

### *Temporal Boundary*

For consideration of cumulative effects, the proposed harvest would have potential to affect soil conditions until disturbed soils have re-vegetated, no more than 5 years. The temporal boundary for analysis of cumulative effects is no more than 5 years.

### *Past Actions*

See 'Past Actions' for Scenic Cumulative Effects

### *Present Actions*

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

### *Reasonably Foreseeable Future Actions*

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

The spatial boundary of the cumulative effects analysis for natural resources is approximately 9,920 acres. There are no reasonably foreseeable future forest practice actions in this area on public land (state and federal). Of this area 30% is in private ownership, of which it is uncertain what actions will be proposed. Of the area approximately 18% is private ownership in GMA, not including parcels which went through the 8(o) process of the Act. Private property would still need to go through either the DNR Forest Practice review process and/ or the CRGNSA review process. Projects which go through the CRGNSA review would be required to meet the natural resource guidelines and standards as outlined by the management plan.

#### *Cumulative Impacts*

Past and present development and management activities have modified the coniferous forest so that structural diversity has been reduced. Some areas of talus and riparian areas have been impacted by past and present activities resulting in habitat loss from development and aquatic degradation from sedimentation. These activities will likely continue to occur; however under guidance of the NSA Management Plan guidelines will ensure that these activities occur in such a manner that the habitats remain stable. Road construction and maintenance is one of the primary sediment sources that impacts water quality; however water quality or quantity and talus habitats would not be affected by this proposal due to mitigation measures and buffers. Because this proposal is enhancing the structural diversity of the habitat type and would avoid impacts to talus and riparian habitat it would not contribute to an incremental degradation of the talus or riparian habitat. This proposal added to past, present and reasonably foreseeable future actions would not result in cumulative significant impacts to these natural resources.

## **G. RECREATION RESOURCES**

*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.

**Findings:** The project is located on private land, adjacent to National Forest System land in RIC 2. Dispersed recreation to Archer Mountain may be affected during logging operation from noise but should not be displaced. The proposal would not result in adverse effects to recreation resources.

#### **Cumulative Effects:**

##### *Effected Resource*

Low Intensity, semi primitive dispersed recreation.

##### *Spatial Boundary*

Archer Mountain is the spatial boundary for recreation cumulative effects.

*Temporal Boundary*

The temporal boundary of cumulative effects would coincide with the time of harvest, which is anticipated to occur collectively for no more than a few months.

*Past Actions*

See 'Past Actions' for Scenic Cumulative Effects

*Present Actions*

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

*Reasonably Foreseeable Future Actions*

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

*Cumulative Impacts*

Past and present development and management activities have created a low intensity, semi primitive dispersed recreation setting. Due to the majority of the land being in public ownership and the management direction for Archer Mountain as SMA these activities are likely to continue to occur but in a manner that maintains the low intensity setting. Because the temporal boundary is so short this proposal would not likely contribute in an incremental modification of this recreation experience. This proposal added to past, present and reasonably foreseeable future actions would not result in cumulative significant impacts to recreation resources.

## **H. CONCLUSION**

The proposed forest practice is consistent with the National Scenic Area Management Plan Policy and Guidelines provided it is implemented as proposed and meets the criteria and conditions listed in the Findings of Fact and Consistency Determination.