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**CRGNSA CONSISTENCY DETERMINATION**  
**CAMP ARROWHEAD FOREST PRACTICE, CD-12-02-S**  
**BARRY SIMMS, ON BEHALF OF COLUMBIA RIVER COUNCIL OF GIRL**  
**SCOUTS**  
**COLUMBIA RIVER GORGE NATIONAL SCENIC AREA**  
**SKAMANIA COUNTY, WA**

**BACKGROUND**

The proposed Forest Practice by Barry Simms on behalf of the Columbia River Council of Girl Scouts 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 December 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-12-02-S, and provided the following conditions are applied. This may be considered the review statement for the Washington Department of Natural Resources.

1. All six historic structures shall be flagged or fenced with temporary construction fencing to prevent inadvertent effects from the proposed forest practices. Note: A map is would be available to the project applicant that identifies these locations.
2. 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. Note: The applicant would also be provided with the policy for inadvertent discovery of cultural resources.
3. Only native plants shall be used for revegetation.
4. Any newly identified wet areas shall be treated as equivalent wet areas as outlined in this decision. Example: a newly identified intermittent stream shall be treated the same as intermittent streams for their buffer widths and treatment restrictions.
5. All Oregon oak (*Quercus garryana*) shall be left untouched.
6. In order to meet the soil productivity guidelines the following conditions shall be made:
  - a. All skid trails having detrimental soil compaction shall be ripped to a depth of 18", water barred, and re-vegetated with native species.
  - b. Areas with disturbed soil shall be re-vegetated with native species.

- c. No more than 15% of the project area shall be disturbed soil.
7. The following conditions shall be made to ensure protection of the riparian buffer zone.
  - a. The applicant shall work cooperatively with WDFW in completing some enhancement activities for the western pond turtle, such as basking structures, which may include work within the water buffer zones.
  - b. No work shall be done within 100 feet of each bank of perennial streams ponds or wetlands, except for snag creation in the mixed Oregon oak release unit and WDFW enhancement activities. In the outer 100 feet of the 200 foot buffer on these streams work shall be limited to a light commercial thinning (approximately 20-25% volume removal and single tree selection). In this zone trees shall be directionally-felled out of the buffer and all disturbed soil should be reseeded with native grasses and/ or plants.
  - c. No work shall be done within 50 feet of each bank of intermittent/ ephemeral non-fish bearing streams.
8. To move the project toward snag and down wood requirements over time, the following shall be implemented:
  - a. Leave all existing snags and down wood, unless identified as a hazard.
  - b. Leave 5 of the largest trees per acre untouched in the western conifer stands. These trees should have sound root systems. Three of which would be retained in perpetuity and two of these trees would be retained for future snag recruitment.
9. The following must be achieved either through retention of existing snags and down wood or by creation. Snag creation may occur within the buffer zone of the ponds in the Oak release unit, as long as the canopy cover outlined in the application for the Oak release unit is met.
  - a. An average of 1 down log /acre of the largest size class trees of the unit. Existing down logs shall be no shorter than 30 feet long. Created down logs shall be left whole or no shorter than 30 feet long.
  - b. An average of 2 snags/ acre. One should be of the largest size class trees of the unit, the other at least 10" DBH. Existing and created snags shall be at least 20 feet tall.
10. The following shall be integrated into the stewardship plan for future forest practices:
  - a. Of the 5 leave trees, three of shall be retained in perpetuity and two shall be retained for future snag recruitment.
  - b. Successive entries shall have larger snag recruitment/ creation, which would achieve snag requirements and eventually contribute to down wood requirements.

#### Other Requirements

1. 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

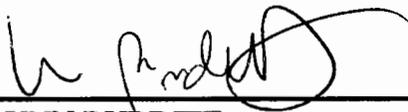
below. Requests for review should be addressed to: Request for Review, Regional Forester, P.O. Box 3623, Portland, OR 97208.

### 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.

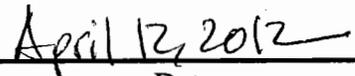
### CONTACT

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).



LYNN BURDITT

Area Manager



Date

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## FINDINGS OF FACT

<b>LANDOWNER:</b>	Columbia River Council of Girl Scouts
<b>PROPOSED ACTION:</b>	Forest Practice
<b>LOCATION:</b>	Township 3N, Range 8E, Section 25 Tax lot: 400 UTM: 464666 1295746
<b>NATIONAL SCENIC AREA DESIGNATION:</b>	Special Management Area
<b>LAND USE DESIGNATION:</b>	Forest
<b>LANDSCAPE SETTING</b>	Coniferous Woodland

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 January 27, 2012. A period of 30 days was allowed for public comment. Four comments were received during the public comment period. Washington Department of Fish and Wildlife commented on the Western Pond Turtle habitat, including mitigation and opportunities for enhancement. Washington Department of Natural Resources submitted comments supporting WDFW and stated that staff geologists will be involved in the review of the proposal. 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 however recommended a more aggressive harvest, oak stand restoration and root rot control.

### B. PROJECT PROPOSAL

The applicant proposes a forest practice on approximately 62 acres of private land in Skamania County. The proposal includes thinning from below in primarily Douglas fir stands on approximately 51 acres and thinning of Douglas fir around Oregon oak on approximately 11 acres. Refer to application submitted for review on January 17, 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. 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 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
<b>Coniferous Woodland,</b> Oak-Pine Woodland	<b>Forest,</b> Agriculture, Residential, Public Recreation	<b>Visually Subordinate</b>

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**. The proposal is topographically visible from the following KVAs:

KVA	Foreground	Middleground	Background
<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>

*Viewer Perspective*

The proposed harvest is located on a relatively flat parcel, not much higher than the Columbia River. The angle at which the property would be viewed from lower elevation KVAs and the surrounding coniferous vegetation would almost entirely screen the property from view. As viewed from Dog Mountain, the harvest units would be in the middleground and not be screened.

As seen from the middleground and background 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)
<b>LANDSCAPE PATTERN (as viewed from middleground and background)</b>	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 with a few very small openings created by wet areas, development and Collins Slide. Larger landscape is fragmented with smaller created openings and linear clearings; which are inconsistent with what natural disturbance would have created.	CONTINUOUS CANOPY with a couple very small openings (minimal change from existing)	MINIMAL (due to existing conditions and treatments)

### *Texture*

The proposal would retain the dominant species of the natural forest canopy. 80% canopy closure for the predominantly Douglas fir stands will retain the texture of the natural conditions and the adjacent forest. A 50% canopy closure in the Oregon oak unit will change the texture of the proposed area to a natural texture, however, it may slightly contrast with adjacent Douglas fir forest canopy.

### *Color*

The Douglas fir forest units will retain the existing color of the forest and not contrast with the surrounding natural forest canopy. The Oregon oak unit prescriptions will change the canopy from a predominantly coniferous to deciduous canopy cover. This will result in a change in color which is consistent with the natural landscape however, may contrast slightly with the adjacent Douglas fir forest canopy.

### *Form & Line*

As viewed from the middleground and background visible forms are created by patches of canopy types. The Douglas fir harvest units 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. The proposal may result in a visible line of contrasting vegetative coverage along the property boundaries of the mixed Oregon oak units which would only be visible from Dog Mountain. The natural vegetation cover in this area is mixed Oregon oak. Adjacent parcels where the Oregon oak has been overtopped by Douglas fir are not consistent with the natural landscape. The adjacent land is National Forest System land and is anticipated to be thinned in the next couple years. The proposal would move the Oregon oak woodland closer to desired conditions and appear visually subordinate from the natural forest canopy coverage. Snag creation around the ponds would be responsive to a natural opening and be visually subordinate to the natural landscape. Considering the texture, color, form and line the proposal would be Visually Subordinate to all Key Viewing Areas. There are no significant 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**

(Guideline 1 is not applicable and not included)

*The Management Plan, Part I, Chapter 1, SMA guidelines, states:*

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

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

## 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).
- (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 and less than 25 percent total canopy cover for oak woodlands. This definition does not include agricultural fields.*

**Two 1 acre created openings would be made with this proposal to control laminated root rot. These openings would retain hardwood vegetation. Areas which are affected by laminated root rot already have a significantly diminished evergreen canopy cover due to the disease. One acre openings are characteristic of this coniferous woodland landscape due to the variable ground created by Collins Slide and numerous ponds. One acre openings are consistent with the desired forest structure and pattern table.**

**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 39 acres of created forest openings currently; 1% of the delineated viewshed. With the additional 2 acres of clearing for this proposal the visible created forest openings would remain at 1% of the viewshed.**

## **Cumulative Effects:**

### ***Affected Resource***

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

### ***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. (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 should take no more than 20 years to return to current visual conditions, considering the proposal would retain 80% canopy closure and 50% canopy closure in the oak release unit. 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 cumulative effects boundary is entirely within the SMA and is approximately 2,800 acres. Approximately 11% of the cumulative effects boundary went through the 8(o) process of the CRGNSA Act. Two one acre openings may contribute to the incremental creation of openings in the canopy however the openings will appear natural in scale and retain hardwood vegetation, meet the scenic standard and have no adverse consequences to scenic resource; therefore would not contribute to an incremental modification of the integrity of the coniferous woodland. This proposal added to past, present 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: A cultural resource survey was completed for the project area. Six historic structures were identified. The applicant is aware of the structures and their locations. All six resource areas would be protected through project design and buffer zones. All six historic structures should be flagged or fenced with temporary construction fencing to prevent inadvertent effects from the proposed forest practices. Note: A map is would be available to the project applicant that identifies these locations.**

**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. Note: The applicant would also be provided with the policy for inadvertent discovery of cultural resources.**

**With these conditions the proposal would have no adverse affects to cultural resources.**

### *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), SMA guidelines, states:*

### **Water Resources (Wetlands, Streams, Ponds, Lakes, And Riparian Areas)**

(Guidelines 2.A. (3-6), 2.G.(2) are not applicable and not included)

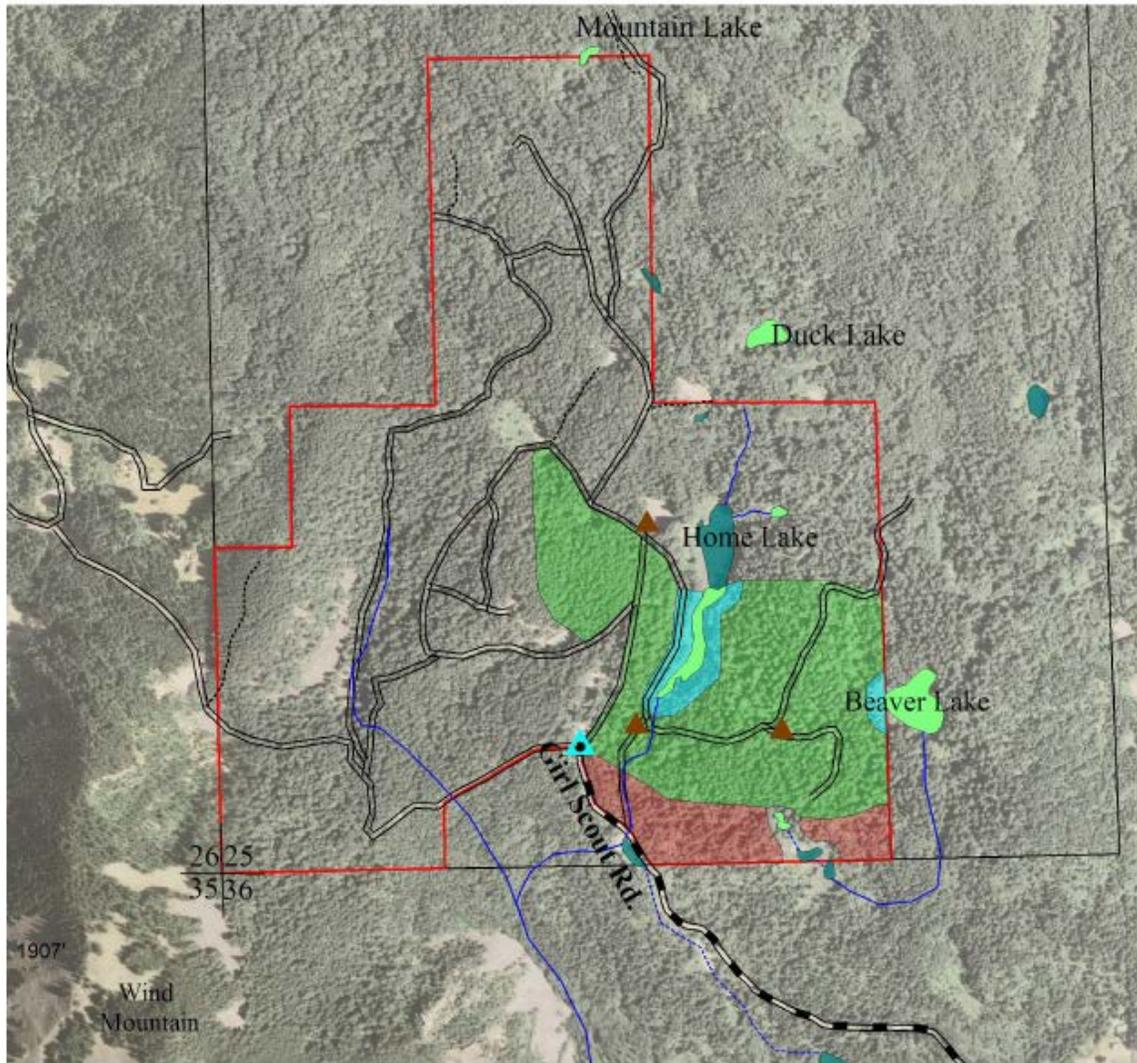
#### *SMA Guidelines*

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)
  - 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:
        - (i) The wetland within the right-of-way is a drainage ditch not part of a larger wetland outside of the right-of-way.
        - (ii) The wetland is not critical habitat.
        - (iii) Proposed activities within the right-of-way would not adversely affect a wetland adjacent to the right-of-way.

**Findings: The proposal is within the buffer zone of stream, pond and wetland resources and not part of a road/ railroad right of way. The management plan requires a 200 foot buffer on all wetlands, ponds, lakes and perennial or fish bearing streams, and a 50 foot buffer on all intermittent (including ephemeral) streams that are not fish bearing. The application submitted for public comment illustrated work up to the edge of some riparian areas. A subsequent map was submitted by the applicant showing buffer zones around the**

ponds which were not originally identified.

### Camp Arrowhead - 2012 Thinning Project Area T3N R8E Section 25



- STREAMS
- ▲ Gate
- ▲ Log landing
- Roads (by Type)
- 'Rocked road'
- - - 'Skid trail'
- 'Light Duty'
- Ponds
- Wetlands
- 2012 Thinning Area
- 2012 Oak Release Area
- RMZ
- Property boundary
- T3N R8E S25
- 2005 aerial photo



Scale = 1 : 900.00 (In : US Feet)

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 plants should be used for revegetation.**

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

D. Wetlands Boundaries shall be delineated using the following:

(1) The approximate location and extent of wetlands in the Scenic Area is shown on the National Wetlands Inventory (U.S. Department of the Interior, 1987). In addition, the list of hydric soils and the soil survey maps shall be used as an indicator of wetlands.

(2) Some wetlands may not be shown on the wetlands inventory or soil survey maps. Wetlands that are discovered by the local planning staff during an inspection of a potential project site shall be delineated and protected.

(3) The project applicant shall be responsible for determining the exact location of a wetlands boundary. Wetlands boundaries shall be delineated using the procedures specified in the '1987 Corps of Engineers Wetland Delineation Manual (on-line edition)'.

(4) All wetlands delineations shall be conducted by a professional who has been trained to use the federal delineation procedures, such as a soil scientist, botanist, or wetlands ecologist.

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 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 has identified water resources on the property. The identified riparian resources have been reviewed by Forest Service ecologist and hydrologist. The Collins Slide area is a known active landslide, therefore hydrologic conditions are continuously changing. The Forest Service specialists determined that the information included in the application is accurate enough for analysis but conditions should be monitored throughout project implementation for wet areas. Due to the changing hydrologic conditions a condition should be made that any newly identified wet areas be treated as equivalent wet areas as outlined in this decision. Example: a newly identified intermittent stream should be treated the same as intermittent streams for their buffer widths and treatment restrictions.**

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.

(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 a mitigation plan.

**Findings: The proposal includes work within the buffer zones of non- fish bearing intermittent and perennial streams, wetlands and ponds. A Practicable Alternative Test has been completed and is included later in this section. Mitigation for entering the wetland will include working with WDFW to complete enhancement activities that will enhance the riparian habitats for western pond turtles. 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.**

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**

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.

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) *Reconfiguring the Buffer Guidelines Not Applicable*

**Findings:** The Forest Service and Washington Department of Fish and Wildlife reviewed the proposal. Two sensitive species were identified within 1,000 feet of the project area and a portion of the project area was identified as a sensitive habitat area. The following species and habitats were identified:

- Western Pond Turtle
- Ringneck Snake
- Northern Spotted Owl Foraging Habitat

The following Priority Habitats are within the project area:  
**Oregon White Oak Woodlands**  
**Riparian (See Water Resource guidelines)**  
**Wetlands (See Water Resource guidelines)**

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:

(1-8) *Evaluation Criteria Guidelines*

(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.

<b>Priority Habitats Table</b>	
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.
Oregon white oak woodlands	Comparatively high fish and wildlife density, species diversity, declining availability, high vulnerability.
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.
Snags and logs	High fish and wildlife density, species diversity, limited availability, high vulnerability, dependent species.
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.

F.-H. *Adverse Effects, Field Surveys and Mitigation Plan Guidelines*

**Findings:** Forest Service Biologist in consultation with WDFW reviewed the proposal for adverse effects to sensitive wildlife and determined there would be no adverse affect to the Western Pond Turtle or Ringneck Snake. Snag and down wood creation around the ponds in the oak release area would enhance potential Western Pond Turtle habitat. Northern spotted owl foraging habitat exists in the proposed project area. In those areas where this habitat exists, the resulting post-thinning canopy closure will be targeted at 80%, thereby maintaining foraging habitat for the spotted owl.

The Southern portion of the project area was identified by the applicant as Oregon oak woodland. The proposal includes thinning of Douglas fir trees to enhance Oregon oak growth. The proposal will result in no adverse effects, as it will be beneficial to the Oregon oak woodland as long as all Oregon oak (*Quercus garryana*) are left untouched as a condition of approval.

Potentially adverse consequences to these resources have been reduced to a negligible level through the application of turtle enhancement and oak preservation measures.

**Because the proposal would result in no adverse effects to sensitive wildlife areas or sites as proposed a mitigation plan for sensitive species is not required. There are no adverse consequences to these resources.**

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: Cumulative effects findings are at the end of this section.**

### **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 the soil productivity guidelines the following conditions should be made:**

- **All skid trails having detrimental soil compaction should be ripped to a depth of 18", water barred, and re-vegetated with native species.**
- **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 applicant's proposed no-touch buffer zone for waters in the project area is 100 feet, except for snag creation in oak release area ponds and enhancement activities in cooperation with WDFW. Beyond the 100-foot buffer zone, the applicant proposed a light commercial thinning (approximately 20-25% volume removal, single tree selection) to improve forest health, to release pockets of advanced regeneration in the understory, and to develop characteristics of old growth forests, including very large trees, snags and down logs.

The applicant describes that these benefits are desirable not only in the uplands, but in proximity to riparian habitats as well. Therefore, a substitution of other upland acres for the area within the outer 100 feet of the 200-foot buffer zone would not accomplish the desired objectives of the project. Thus, this enhancement project meets the No Practicable Alternative Test.

The creation of snags within the buffer zone of the ponds in the oak release area would be beneficial to habitat and wildlife diversity. The creation of snags within these buffers would provide more potential suitable habitat and basking structures for Western Pond turtles. By slowly opening up the canopy hardwood species, such as Oregon oak would be released, providing more forest species diversity. The creation of snags within these buffer zones, to enhance them, has no practicable alternative.

## Mitigation Plan

The following conditions should be made to ensure protection of the riparian buffer zone.

- The applicant should work cooperatively with WDFW in completing some enhancement activities for the western pond turtle, such as basking structures, which may include work within the water buffer zones.
- No work should be done within 100 feet of each bank of perennial streams ponds or wetlands, except for snag creation in the mixed Oregon oak release unit and WDFW enhancement activities. In the outer 100 feet of the 200 foot buffer on these streams work should be limited to a light commercial thinning (approximately 20-25% volume removal and single tree selection). In this zone trees should be directionally-felled out of the buffer and all disturbed soil should be reseeded with native grasses and/ or plants.
- No work should be done within 50 feet of each bank of intermittent/ ephemeral non-fish bearing streams.

The mitigation plan has been reviewed, and with the proposed mitigation and conditions there are no adverse consequences to a sensitive wildlife/ plant area or site.

### 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>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>≥ 80% average total canopy Closure</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>Two 1 acre openings, retaining hardwood canopy</b>	<b>Consistent</b>
	<b>Leave Trees</b>	<b>Leave 15% of existing tress 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>Two 1 acre openings, retaining hardwood species.</b>	<b>Not Consistent. See additional information below.</b>
	<b>Average Down Wood</b>	<b>18- 25 pieces greater than 20” dbh (Pieces 30 ft long per acre (scattered))</b>	<b>5 down logs per acre greater than 16” dbh, 12’ long</b>	<b>Not Consistent. See additional information below.</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>The stewardship plan states: Each thinning will create or designate 3 snags per acre</b>	<b>Not Consistent. See additional information below.</b>

			greater than 14" DBH, subject to safety constraints	
Ponderosa Pine/ Oregon oak	Forest Structure (Average % total canopy closure (cc))	25-60% canopy closure, Understory layer greater than 25% of total cc.	≥ 25% average total canopy Closure	Consistent
	Forest Openings	Openings less than 1 acre Openings have 0-25% canopy closure Openings widely dispersed	No created openings.	Consistent
	Leave Trees	No leave trees required (Includes all available remnant old forest)	No created openings.	Consistent
	Average Down Wood	1-3 pieces greater than 20" dbh (Pieces 30 ft long per acre (scattered))	5 down logs per acre greater than 16" dbh, 12' long	Not Consistent. See additional information below.
	Average Snags	5 snags at 10"-20" dbh and 3 snags greater than 20" dbh Oak snags can be counted if already dead or partially dead. ((Conifers) No. per acre Snags are 20-40 ft in height)	The stewardship plan states: Each thinning will create or designate 3 snags per acre greater than 14" DBH, subject to safety constraints	Not Consistent. See additional information below.

(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).

**Findings:** The proposal includes two 1 acre openings to control the spread of laminated root rot. The proposal does not meet the requirements for leave trees in the created forest openings because it would not be retaining 3 of the largest trees in that opening. The

hardwood cover in this area would likely retain 15% of the trees in the opening. The deviation from this standard is for the benefit of forest health, in that it would reduce the spread of laminated root rot. The size of the created opening is consistent with the guidelines and meets scenic standards.

- (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 proposal does not meet the Desired Forest Structure and Pattern table and a stewardship plan was submitted. The Stewardship Plan states:

“Each thinning will create or designate 3 snags per acre greater than 14” dbh, subject to safety constraints”

“During each thinning cull logs will be left on the forest floor to enhance the large woody debris on the site. Additional logs will be designated for retention such that the project will add a total of 5 down logs per acre greater than 16” diameter, minimum length 12’. Over successive thinning entries down wood will accumulate toward the Forest Service’s targets. Over the long-term, the desired down wood goal is 18 pieces greater than 20” diameter and 30’ length. This goal will be achieved incrementally over time to create down wood of different decay classes.”

The application clarifies that trees will be designated for snag recruitment, to allow for natural creation.

Due to the type of use at the site, naturally created snags often become hazard trees and are removed. This does not allow for snag recruitment. In order to ensure that the forest is moving towards the snag and down wood requirements existing snags should be retained and new snags created so that they are located such that they are compatible with the use. The Southern portion of the unit, identified in the application as the Oak Release area, is more suitable for snag creation. This area is also mixed Douglas fir Oregon oak and other hardwood species. There are also ponds in this area which may be suitable for the Western Pond turtle. Considering these conditions, snags and down wood are allowed to be created within the buffer zone of the ponds in this area. In doing so, the canopy around the ponds would be opened up to allow for better Western Pond turtle habitat, snag and basking structure creation, and enhancement of forest diversity through the release of hardwood species. The creation of snags within this buffer is included in the Practicable Alternative Test.

Because the proposal includes work in areas where there are larger trees for down wood creation, down wood should be of the largest size class in the unit, which is likely greater than 16” DBH. The management plan specifies down wood lengths at 30 feet, more than

double what is proposed.

These things considered, the following should be made conditions of approval to move the project toward to snag and down wood requirements over time:

- Leave all existing snags and down wood, unless identified as a hazard.
- Leave 5 of the largest trees per acre untouched in the western conifer stands. These trees should have sound root systems.

The following should be achieved either through retention of existing snags and down wood or by creation. Snag creation may occur within the buffer zone of the ponds in the mixed Oregon oak forest type, as long as the canopy cover outlined in the application for the Oak release unit is met.

- An average of 1 down log /acre of the largest size class trees of the unit. Existing down logs should be no shorter than 30 feet long. Created down logs should be left whole or no shorter than 30 feet long.
- An average of 2 snags/ acre. One should be of the largest size class trees of the unit, the other at least 10" DBH. Existing and created snags should be at least 20 feet tall.

The following should be integrated into the stewardship plan for future forest practices:

- Of the 5 designated leave trees per acre, three should be retained in perpetuity and two should be retained for future snag recruitment.
- Successive entries should have larger snag recruitment/ creation, which would achieve snag requirements and eventually contribute to down wood requirements.

Through the creation of large and small snags in a location that is compatible with natural resources and user needs, retention of existing snags and down wood and protection of the largest trees, the stand would be set up to achieve the Desired Forest Structure and Pattern table in future entries.

## **Cumulative Effects**

### *Affected Resource*

The resource affected by this proposal is the riparian, oak woodland and sensitive species habitat.

### *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 riparian cumulative effects is the Collins Slide area. (A map of this boundary is available in the project record)

### *Temporal Boundary*

It would likely take no more than 20 years for the Oak release unit to return to current conditions with oaks overtopped by fir and affect riparian and sensitive species. The temporal boundary for analysis of cumulative effects is no more than 20 years.

*Past Actions*

See 'Past Actions' for Scenic Cumulative 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 riparian, Oregon oak and sensitive species 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. Of the cumulative effects boundary there is approximately 7% of the land went through the 8(o) process of the act. The majority of the land base would be required to go through Forest Practice review for the CRGNSA. Due to NSA Management Plan restrictions these activities will likely continue to occur at current intensities and sustain current conditions. 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 riparian, 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.

## 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 temporarily displace recreation use during harvest activity, but would not cause adverse effects to recreation resources. The applicant is encouraged to post harvest activity timelines to inform recreationists.**

### **Cumulative Effects:**

#### *Effected Resource*

**Very low Intensity, semi primitive dispersed recreation and recreation at Camp Arrowhead.**

#### *Spatial Boundary*

**Collins slide area 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 cumulatively created a very low intensity, semi primitive dispersed recreation setting and a developed Girl Scout Camp. Due to CRGNSA management plan regulation these activities would likely continue to**

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occur at this level of intensity and maintain the existing recreation experience. 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 significant cumulative impacts to recreation resources.

### **SMA Provisions: Recreation Intensity Classes**

(Guidelines 1-4 are not applicable and not included)

## **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.