



File Code: 2370-CD-07-04-S

Date: August 22, 2007

Barry Simms
Trout Mountain Forestry
721 NW 9th Ave Suite 228
Portland, Oregon 97209

Mr. Simms:

As you know, you are required to be consistent with the purposes of the Columbia River Gorge National Scenic Area Act as determined by the Forest Service and as described in the Memorandum of Understanding dated February 24, 1998 with Washington State DNR.

A forest practices application was received by this office describing the following forest practice:

Camp Arrowhead is a 266 acre Camp that is surrounded on three sides by National Forest. A thinning is proposed on approximately 47 acres in the northern portion of the Camp. This area is occupied by a 100 year old stand of Douglas-fir, which is the predominant forest type throughout the ownership as well as on adjacent federal lands. Stocking in the stand is very high and there have recently been some mortality and blowdowns related to root rot and at least in part attributable to the high stocking. Basal area is 310 square feet per acre, and tree density is estimated to be 151 trees per acre.

The proposed silvicultural prescription is primarily an even-age thinning. The thinning will generally be from below to ensure that the healthiest and most windfirm trees are retained to minimize the risk of post-thinning blow-down. The trees to be removed are those with poorer vigor and smaller crowns. Occasionally, a larger dominant tree will be removed when the removal will release at least three higher quality stems of smaller diameter. There are several small (<1 acre) root rot pockets scattered through the project area. In these areas, small group selection will be used to harvest dying or at-risk trees and to help slow the spread of the root rot through the stand. The strategy will also involve releasing bigleaf maple to ensure this species remains in the stand for biodiversity and also to help limit the spread of root rot by interfering with Douglas-fir-to-Douglas-fir root contact.

I find that the proposed thinning is consistent with the Columbia River Gorge National Scenic Area (CRGNSA) Management Plan and the Conservation Easement GP 320 provided that it is implemented as described in the CRGNSA Consistency Determination Findings of Fact, referenced as CD-07-04-S, and the following conditions are applied:

1. Project activities shall occur outside of the growing season of plants and the general nesting/rearing season for birds and other wildlife species (March 1-August 31).
2. Mechanized equipment (including chainsaws) may not be allowed between December 15--March 31 to reduce cumulative disturbance to deer/elk if needed for their designated winter range during a harsh winter. The CRGNSA or state wildlife biologist shall determine that the area is not being used as winter range (such as during mild winter weather).



3. All haul routes having detrimental soil compaction shall be ripped to a depth of 18", water-barred, seeded with native grass seed, and mulched with fine slash.
4. Scenic Area Management Plan standards for soil productivity shall be met in the project area. These state that not more than 15% of an activity area will be detrimentally disturbed. This includes compaction, displacement, puddling and removal of organic layers exposing mineral soil.
5. Areas where post treatment field surveys indicate that a majority of the vegetation was removed and slow vegetation recovery is expected shall be seeded with a native seed mixture to reduce the chance of surface erosion.
6. Re-vegetate all disturbed areas with desired native bunch grass, forb and shrub species. Appropriate forage species for big game winter range includes bluebunch wheatgrass (*Agropyron spicatum*), Idaho fescue (*Festuca idahoensis*), Serviceberry (*Amelanchier alnifolia*), arrowleaf balsamroot (*Balsamorhiza sagittata*), deerbrush (*Ceanothus integerrimus*), and others.
7. Three of the largest trees per acre shall be left in order to preserve large tree character within the stand.
8. Seven trees of the largest size class available per acre shall be permanently marked for snag recruitment. These trees should have sound roots (no root rot) but should have defects that would lead to early mortality such as broken tops, etc. Existing snags and down logs shall remain.
9. No trees over 20" dbh shall be harvested unless 30 linear ft. are left for down wood from each tree harvested until the down wood requirement is met.
10. The canopy closure on the group selection areas shall remain from 60-80% as per the desired forest structure and pattern table.
11. If any historic or prehistoric cultural resources are uncovered during project activities, work shall cease and the CRGNSA archeologist shall be notified. The Forest Service shall also notify the Washington State Historic Preservation Office and the Indian Tribal Governments within 24 hours if the resources are prehistoric or otherwise associated with Native American Indians.

Implementation Date: This project may begin immediately as long as it complies with the conditions as described in items 1-11 above. This decision expires on August 22, 2009. If implementation has not commenced before that date, a new consistency review or extension shall be required.

Appeal 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 are addressed to: Request for Review, Regional Forester, P.O. Box 3623, Portland, OR 97208.

Contact Person: The Columbia River Gorge National Scenic Area staff prepared an analysis file in conjunction with this project. For further information, contact Diana Ross at the Columbia River Gorge National Scenic Area, 541.308.1716, e-mail: dlross@fs.fed.us.

/s/Daniel T. Harkenrider

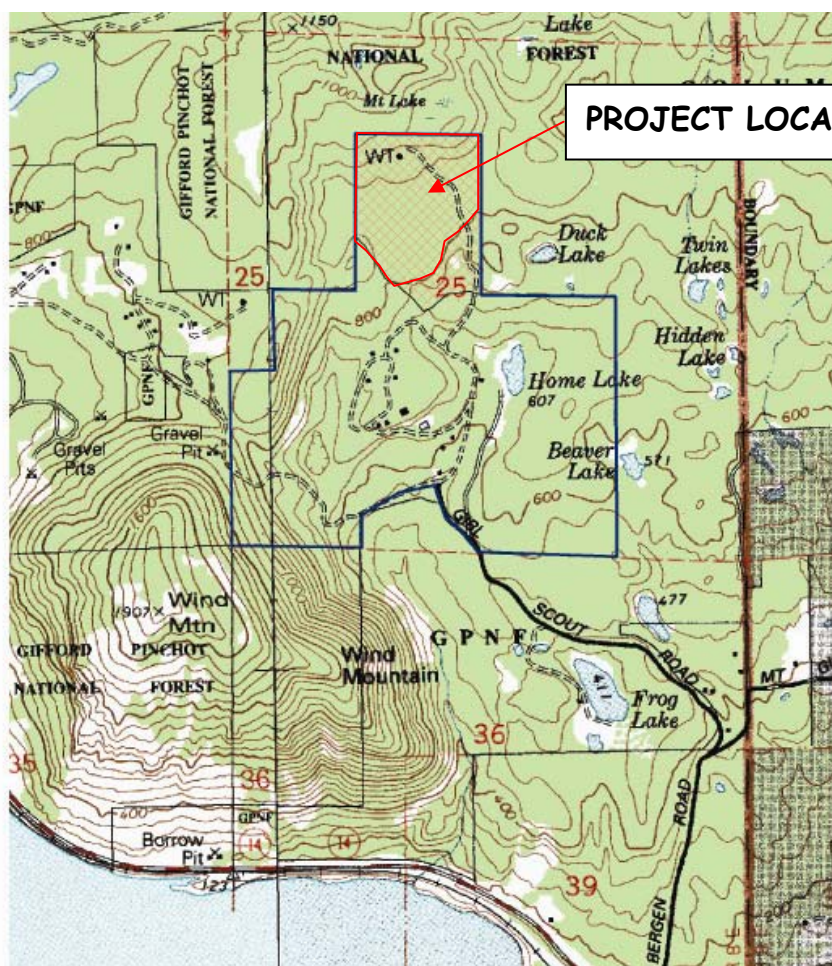
DANIEL T. HARKENRIDER
Area Manager

Date: August 22, 2007

cc: Rex Hapala, WA DNR
Cynthia Hamilton, Columbia River Council of Girl Scouts
Jill Arens, Columbia River Gorge Commission;
Rick Till, Friends of the Columbia River Gorge

FINDINGS OF FACT

LANDOWNER:	Columbia River Council of Girl Scouts
PROPOSED ACTION:	Forest Practice-Thinning from below and group selections.
LOCATION:	Skamania County, Washington. Township 3N, Range 8E, Section 25 Taxlot: 4000 Quad 10 UTM: 597723 5063689
NATIONAL SCENIC AREA DESIGNATION:	Special Management Area (SMA)
LAND USE DESIGNATION:	Forest
LANDSCAPE SETTING:	Coniferous Woodlands



FINDINGS OF FACT:

The following findings of fact contain the applicable standards and guidelines from the CRGNSA Management Plan. The Management Plan, as revised and adopted in 2004, is in effect. The CRGNSA Management Plan standards and guidelines are displayed in **bold type**. The findings are displayed in regular type. Guidelines that are not applicable to this project as indicated as not applicable or are not included.

A. Public Comment

Two Comment letters were received during the comment period which began with a public notice dated June 27, 2007. Washington DNR commented on July 25, 2007, indicating a concern that the applicant plans to deviate from the required snag and down wood quantities. Friends of the Columbia Gorge commented on July 27, 2007. They were concerned that the project must follow the Management Plan guidelines, and that a complete application be submitted—including a stewardship plan. These comments are addressed in the findings for the applicable guidelines below.

B. Project Proposal

Camp Arrowhead is a 266 acre Camp that is surrounded on three sides by National Forest. A thinning is proposed on approximately 47 acres in the northern portion of the Camp. This area is occupied by a 100 year old stand of Douglas-fir, which is the predominant forest type throughout the ownership as well as on adjacent federal lands.

Stocking in the stand is very high and there have recently been some mortality and blowdown related to root rot and at least in part attributable to the high stocking. Basal area is 310 square feet per acre, and tree density is estimated to be 151 trees per acre. The mean diameter-breast-height (DBH) is approximately 19 inches. The current estimated canopy closure is 90-100% in the overstory and 0-20% in the understory. The Relative Density is calculated to be 70. Bigleaf maple is present in the understory but is suppressed. The stand contains several small root rot pockets where blowdown has occurred and is ongoing.

The desired future condition is an old-growth Douglas-fir/bigleaf maple stand that is healthy and resilient. This includes snags and down logs, which are currently virtually absent from the forest. Some planting of Douglas-fir and western red cedar will be attempted to create an uneven-age condition.

The silvicultural prescription is primarily an even-age thinning. The thinning will generally be from below to ensure that the healthiest and most windfirm trees are retained to minimize the risk of post-thinning blowdown. The trees to be removed are those with poorer vigor and smaller crowns. Occasionally, a larger dominant tree will be removed when the removal will release at least three higher quality stems of smaller diameter. There are several small (<1 acre) root rot pockets scattered through the project area. In these areas, small group selection will be used to harvest dying or at-risk trees and to help slow the spread of the root rot through the stand. The strategy will also involve releasing bigleaf maple to ensure this species remains in the stand for biodiversity and also to help limit the spread of root rot by interfering with Douglas-fir-to-Douglas-fir root contact.

The current timber volumes range from 40 to 50 MBF/acre on the most productive soils, to approximately 20 MBF/acre in areas of shallower, rockier soils and harsher sites. Because of the concern about blowdown (the stand has not been thinned for many decades, if ever), and because of the obvious importance of aesthetics for the site, the thinning will be quite conservative. The thinning removals will range from 3 to 10 MBF per acre, based on the stand conditions. The average removal target will be 5 MBF per acre, or about 15% of the total estimated volume in the stand. The target residual basal area will be 200 to 250 square feet per acre, depending on initial stocking. Also, the target residual trees per acre will be 80 to 120, again depending on initial stocking. The target percent canopy cover after the treatment is 80%. Small group selection units will be kept to no more than 2 acres in size, with retention of at least three trees per acre of the largest size trees available.

Presently, there are very few down logs or snags in the project area. Potential snags will be designated for permanent retention. It is possible that after the thinning, some tree tops may be blown out by high winds, particularly during winter storms. This may significantly enhance snag recruitment. Snag creation by topping trees will be considered over time if natural snag recruitment is not sufficient. The project goal will be the creation of 3 snags per acre greater than 14" DBH. Over the long term, the desired snag density is 10 snags at 10"-20" and 7 snags larger than 20" per acre. This goal will be achieved by incrementally increasing snag component in the stand.

The proposed project will leave any cull logs on the forest floor to enhance the large woody debris on the site. The project goal will be to leave a total of 5 down logs per acre greater than 16" diameter, minimum length 12'. Over the long-term, the desired down wood goal is 18 pieces greater than 20" diameter and 30' length. This goal will be achieved by incrementally increasing the down wood component in the stand.

Because the proposed treatment is very light, there are no specific "exclusion areas" per se. This area of the property was selected for treatment because it is generally away from any streams and ponds and well away from the main camp facilities. Nevertheless, the goal of the treatment will be to minimize visual impacts, and minimize soil disturbance, while enhancing tree health on the property.

All skid trails will be laid out prior to the start of the project, and will be designated as permanent skid trails to minimize long-term compaction to the forest floor. Skid trails will be located no closer than 100' apart. Areas between skid trails will be yarded by cable and winch where practicable, as well as by rubber-tire skidder during dry conditions. During periods of wet soils, no machinery will be allowed off the designated skid trails.

In thinning areas, lop and scatter will be the treatment. In small group selection areas, pile and burn will be the treatment

C. Land Use Designations

1. The Management Plan, Part II, Chapter 2 (Forest Land) SMA Guidelines, Review Uses

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

B. Forest uses and practices as allowed in Part II, Chapter 2: Forest Land.

Findings: The project, as adequately described in the project description document, is a forest practice, an allowed use. The Management Plan defines a forest practice as “Any activity conducted on or directly pertaining to forested land and relating to forest ecosystem management including but not limited to growing, thinning, or removing live or dead forest tree or shrub species, road and trail construction, reforestation, fertilizing, brush control, prevention of wildfire, and suppression of diseases and insects...”

The comments from Friends of the Columbia Gorge (FOCG) and the Washington DNR concerning the stewardship plan differed. FOCG stated that a stewardship plan is required as part of the application. A stewardship plan is only required if the applicant “proposed to deviate from the snag and down wood requirements...” or “if the treatment is proposed to go beyond” the maximum created opening size requirements.

Washington DNR commented that “we tried to determine if the ...Application was trying to deviate from the snag and down wood requirements. It appears that if they are going to deviate from the outlined standards, then a Stewardship Plan should be included”. The Forest Service concluded that the applicant intends to meet the snag and down wood requirements over time and does not claim a deviation would benefit the stand “based on forest health or ecosystem function” as required by the Management Plan. See page 9 for a complete discussion of the snag and down log requirements and a detailed review of the applicant’s proposal with regard to snags and down wood.

D. Scenic Resources

1a. The Management Plan, Part II, Chapter 2 (Forest Land) SMA Guidelines, states:

(4) For forest practices, the following scenic resource guidelines shall apply:

(a) Forest practices shall meet the design guidelines and scenic standards for the applicable landscape setting and zone.

1b. The Management Plan, Part I, Chapter 1, Scenic Resources, states:

SMA Guidelines

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	Forest	Visually Subordinate

Findings: The project area is located in the Forest land use designation. The scenic standard that the project must meet is visually subordinate from Key Viewing Areas (KVAs) which is defined as “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.**” Diana Ross, CRGNSA landscape architect provided the following scenic analysis:

Key Viewing Areas: The project is topographically visible from the following 4 Key Viewing Areas as indicated with an **X** in the table below:

KEY VIEWING AREA	DISTANCE ZONE		
	FOREGROUND 0-1/4 Mile	MIDDLEGROUND 1/4 to 3 Miles	BACKGROUND Over 3 Miles
Columbia River		X	X
SR-14			X
I-84		X	X
Historic Columbia River Hwy		X	X
Sandy River			
Pacific Crest Trail			
Portland Women’s Forum			
Crown Point			
Rooster Rock State Park			
Larch Mtn. Road			
Larch Mountain			
Larch Mtn. Sherrard Point			
Cape Horn			
Bridal Veil State Park			
Multnomah Falls			
Bonneville Dam Visitor Center			
Beacon Rock			
Dog Mtn. Trail		X	
Cook-Underwood Road			
Wyeth Bench Road			
Oregon Highway 35			
Panorama Point Park			
SR-141			
SR-142			
Old Highway 8			
Rowena Plateau and Nature Conservancy Viewpoint			

The project area is not highly visible from Key Viewing Areas. In addition, the prescription calls for thinning from below which will not be seen from any foreground KVAs and will remain natural-appearing from the middleground and background distance zones.

Form, Line, Color, or Texture Common to The Natural Landscape

Findings: The following chart summarizes findings concerning the elements described in the definition of visual subordination for forest practices from the middleground and background distance:

LANDSCAPE ELEMENT	NATURAL	EXISTING	AFTER TREATMENT	DEGREE CHANGE (From Natural)
LANDSCAPE PATTERN (Form/Line)	CONTINUOUS CANOPY 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 than natural disturbance would have created.	CONTINUOUS CANOPY (minimal change from existing)	MINIMAL (due to existing conditions rather than treatments)
LANDSCAPE STRUCTURE (Form, Line, Color)	Large Trees Cathedral-like Very Large Douglas-fir visible on ridge-tops.	Smaller Trees Not Cathedral-like Few visible large Douglas-fir.	Larger Trees more visible but not big Enough for Cathedral-like More large Douglas-fir may be visible due to removal of smaller trees.	Short Term: MEDIUM (but caused by existing condition more than by treatment) Long Term: MINIMAL, Thinning and retaining largest trees will help restore a more natural condition.
GROUND PLANE (Color, Texture)	Grasses Wildflowers Fern, Shrubs	Many areas grass and wildflower layer shaded out.	Short Term: Disturbed Long-term: Grasses, Wildflowers, Shrubs Disturbed ground, stumps, slash, spindly trees, boundary marks not visible due to distance from KVAs.	Short Term: MEDIUM Long Term: MINIMAL Concern for Foregrounds only

2. The Management Plan, Created Opening Chapter 2 (Forest Land) SMA Guidelines Review uses, **1.X.(4) b-g** :

Findings: The Management Plan defines a created opening as an 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 applicant is proposing a thinning with a post-treatment canopy closure of 80%. No created openings are proposed and no created openings will result from this project. The applicant’s prescription for the west conifer vegetation type proposes an average canopy closure of 80% percent which falls within the

desired limits required by the Management Plan as indicated below with an excerpt from the Desired Forest Pattern and Structure table below:

<u>West Conifer</u>	60-80% canopy closure Understory layer variable (0-60% of total cc)
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The thinning includes small group selections that will not exceed 2 acres in size. A condition should be placed requiring that the canopy closure on these group selection areas remain from 60-80% as per the desired forest structure and pattern table. With conditions, the thinning will meet the requirements of the Management Plan. It should be noted that created openings are allowed in this vegetation type. However, the applicant described the group selections as part of the thinning.

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 No buildings are proposed. The applicant proposed to plant native trees to add structural diversity to the stands. Therefore, the applicable criteria are met.

E. Cultural Resources

The Management Plan, Part II, Chapter 2 (Cultural Resources), SMA guidelines, 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.**
- 4. Reviewing agencies shall use the following steps under 36 CFR 800 (4.9) for assessing potential effects to cultural resources (Steps 1-5).**

Findings: The tribes were notified of this project on June 27, 2007. No comments were received. The CRGNSA archeologist, Marge Dryden, states in her July 3, 2007 report that: “I have reviewed the proposed undertaking and area of potential effect as stated on the development review application, against the National Scenic Area records and inventories. These inventories include the cultural resource site inventory maintained by the State Historic Preservation Office. Based upon the information provided in these inventories and the requirements of the Gorge Commission’s Land Use Ordinances, it is recommended that:

Cultural Resource Reconnaissance Survey: Required and has been Completed.
Historic Survey: Not Required.”

The project is not within 100 feet of a high probability zone or 500 feet from a known archeological site.

A condition should be placed requiring that if any historic or prehistoric cultural resources are uncovered during project activities, work shall cease and the CRGNSA archeologist shall be notified. The Forest Service shall also notify the Washington State Historic Preservation Office and the Indian Tribal Governments within 24 hours if the resources are prehistoric or otherwise associated with Native American Indians.

With conditions, the project meets the cultural resources guidelines.

F. Natural Resources

1. The Management Plan, Part II, Chapter 2 (Forest Land) SMA Guidelines, states:

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

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

Findings: See findings under Scenic Resources, page 7, above. The desired forest structure includes a discussion of tree sizes. It is required that 3 of the largest trees per acre remain. A condition should be placed emphasizing this requirement.

(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.Y.(4)(f).

Finding: No created openings are proposed. See findings under scenic resources above.

(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.

Findings: For the west conifer vegetation type, the Management Plan describes the following desired condition:

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' in length.

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 stand as 100 years old and deficient in snags and down logs: "Presently, there are very few down logs or snags in the project area." It is assumed from these facts that the stand has not yet reached its full capacity for producing the required numbers of snags and down logs. A condition should be placed requiring that existing snags and down logs be retained.

After conservation of the existing snags and down wood, the next step for meeting the Management Plan requirements is to actively manage the stand to create more snags and down wood. Studies in western conifer stands have shown that about 30% of existing snags fall down to provide down wood every 10 years. Therefore, the emphasis for management is snag creation or recruitment. It is not generally expected that active snag creation will account for all of the desired snag density. The applicant describes the creation and recruitment of snags in order to meet the requirements below:

"Potential snags will be designated for permanent retention. It is possible that after the thinning, some tree tops may be blown out by high winds, particularly during winter storms. This may significantly enhance snag recruitment. Snag creation by topping trees will be considered over time if natural snag recruitment is not sufficient. The project goal will be the creation of 3 snags per acre greater than 14" DBH. Over the long term, the desired snag density is 10 snags at 10"-20" and 7 snags larger than 20" per acre. This goal will be achieved by incrementally increasing the snag component in the stand. The proposed project will leave any cull logs on the forest floor to enhance the large woody debris on the site. The project goal will be to leave a total of 5 down logs per acre greater than 16" diameter, minimum length 12'. Over the long-term, the desired down wood goal is 18 pieces greater than 20" diameter and 30' length. This goal will be achieved by incrementally increasing the down wood component in the stand.

The applicant is required to leave 3 of the largest trees per acre in order to preserve large tree character within the stand. In addition, to assure trees of the largest size are available for snag creation or recruitment, a condition should be placed requiring an additional 7 trees of the largest size class per acre be left for snag recruitment. These trees should have sound roots (no root rot) but should have defects that would lead to early mortality such as broken tops, etc. In addition, a condition should be placed that no trees over 20" dbh shall be harvested unless 30 linear ft. are left for down wood from each tree harvested until the down wood requirement is met. With these conditions, the project will meet the snag and down wood requirements as influenced by the existing stand conditions.

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

1. **Ensure that natural resources are protected from adverse effects.**
2. **WATER RESOURCES (Wetlands, Streams, Ponds, Lakes, and Riparian Areas)**
 - A. **Buffer zone sizes (unless needing to be increased due to criteria (a)-(c) or requested to be reconfigured per guideline (4)):**
 - 200 ft-Perennial or Fish Bearing Stream or Wetland, Pond or Lake**
 - 50 ft.-Intermittent or Ephemeral stream**
 - No buffer for maintenance, repair, reconstruction or realignment of roads and railroads within rights-of-way if wetland is a ditch, not critical habitat, and proposed activities would not affect an adjacent wetland out-side of the right-of-way.**
 - B. **Buffers Replanted With Native Plants Only**
 - C.-F **Wetland, Stream, Pond, Lake, Columbia River Boundary Locations**
 - G. **Buffers zones shall be undisturbed unless unavoidable and offset by deliberate restoration or Mitigation Plan and proved to have no alternative through the No Practicable Alternatives Test**
 - Filling and draining of wetland prohibited unless criteria (a)-(c) met.**
3. **SENSITIVE WILDLIFE AND PLANTS (Within 1000 ft. of proposed development/use)**

Findings: The project was designed to avoid the water resources on the parcel. Duck Lake is within approximately 800 feet of the project area, and East Lake is over 1,000 feet away. Therefore, the project is outside of any water resource boundaries. There are no known sensitive wildlife or botanic sites in the project area but are likely in the vicinity. A condition should be placed requiring a seasonal restriction on the operation schedule to avoid disturbance to wildlife and native plant growing seasons:

- Project activities should occur outside of the growing season of plants and the general nesting/rearing season for birds and other wildlife species (March 1 to August 31).
- No mechanized equipment (including chainsaws) should be used between December 15 to March 31 to reduce cumulative disturbance to deer/elk on their designated winter range. These activities may occur if the scenic area or state wildlife biologist determines that the area is not being used as winter range (such as due to mild winter weather).

4. SOIL PRODUCTIVITY

Control soil movement, erosion and stream sedimentation
Disturbed area (except for new cultivation) shall not exceed 15% of project area
80% of disturbed area-establishment of native ground cover within 1 year of project completion

Findings: The applicant's site plan designated haul routes to reduce the area of potential compaction. Water resource areas were avoided. The following conditions should be applied:

- All haul routes having detrimental soil compaction should be ripped to a depth of 18", water-barred, seeded with native grass seed, and mulched with fine slash.
- Scenic Area Management Plan standards for soil productivity shall be met in the project area. These state that not more than 15% of an activity area will be detrimentally

disturbed. This includes compaction, displacement, puddling and removal of organic layers exposing mineral soil.

- Areas where post treatment field surveys indicate that a majority of the vegetation was removed and slow vegetation recovery is expected should be seeded with a native seed mixture to reduce the chance of surface erosion.
- Opportunities exist to enhance habitat for native wildlife species after treatment by re-vegetating all disturbed areas with desired native bunch grass, forb and shrub species. Appropriate forage species for big game winter range includes bluebunch wheatgrass (*Agropyron spicatum*), Idaho fescue (*Festuca idahoensis*), Serviceberry (*Amelanchier alnifolia*), arrowleaf balsamroot (*Balsamorhiza sagittata*), deerbrush (*Ceanothus integerrimus*), and others.

G. Recreational Resources

1. The Management Plan, Part II, Chapter 4 (Recreation Resources),SMA Guidelines, states:

- 1. New developments and land uses shall not displace existing recreational use.**
- 2. Recreation resources shall be protected from adverse effects...**

Findings: The project is located on private land and will not displace existing recreation use or create adverse effects due to project design and location.

H. Conclusion

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