



File Code: 2370-CD-08-03-S

Date: August 06, 2008

Carlo M. Abbruzzese  
Washington Dept Of Natural Resources  
P.O. Box 280  
Castle Rock, WA 98611-0280

Mr. Abbruzzese:

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:

The objective of this project is to abandon 2.5 miles of road in the Table Mountain Natural Resources Conservation Area (NRCA) and 1.7 miles at Columbia Falls NAP, (See Figure 1 and 2). Sections of the road to be abandoned run through patches of old growth forest while other sections traverse older natural forest that regenerated after the Yacolt Burn. The road to be decommissioned will utilize light abandonment techniques such as water barring and ripping with some limited pullback side-cast material. Two small log puncheons will be removed on Table Mountain NRCA.

Road abandonment will protect these two sensitive Natural Areas by restricting public access to the more sensitive portions of the preserves, thus reducing the threat of introduction of weeds, tree theft, disturbance of wildlife, trash dumping, potential for human caused wildfire, and erosion caused by illegal off-road vehicle use. In recent years, access into these natural areas via all terrain vehicles has increased dramatically. Recently, individuals built a permanent structure that is likely part of a hunting camp, and others cut down alders to make an opening for a small marijuana plantation at Table Mountain. The project will also ultimately benefit the rare features these sites were established to protect by reducing habitat fragmentation and by reducing human disturbance to wildlife.

Waterbars will be installed along abandoned road at a spacing that will insure proper drainage and minimize erosion and sedimentation. Waterbars will be placed perpendicular to the road centerline on road grades of less than 3% and close to 30% on grades greater than 3%. Where there is poor regrowth of native trees, road surfaces will be decompacted by ripping them with 12-inch teeth attached to a bulldozer. Abandoned roads will be blocked to prevent motorized vehicle access either by obliterating the roadbed or by digging out a tank trap.

During the course of puncheon removal and other road abandonment work, a few young, non-merchantable trees may need to be felled. These trees are growing on the existing road prism or on fills and will only be removed when absolutely necessary to complete road abandonment work. None of these trees that may need to be removed are large enough to provide suitable nesting habitat for spotted owls. Trees to be felled will be left on site.



All roads are under the forest canopy and cannot be seen from any gorge viewpoints. All soil disturbance will be minimized and restricted to soils that have been disturbed in the past.

On August 1, 2008, the applicant contacted Diana Ross via e-mail to withdraw part of the application: "...we decided to drop the road abandonment project at Columbia Falls near Archer Mountain this year." This leaves the 2.5 miles of road in the Table Mountain Natural Resources Conservation Area (NRCA) as the entire project to be considered in this application.

I find that the proposed road abandonment project as described above and in the Findings of Fact is consistent with the Columbia River Gorge National Scenic Area (CRGNSA) Management Plan provided that it is implemented as described in the CRGNSA Consistency Determination Findings of Fact, referenced as CD-08-03-S, and the following conditions are applied:

1. Work on the Table Mountain portion of the project shall not proceed until a letter of permission is received from the CRGNSA with respect to the rights reserved by the United States on the subject road.
2. Coordinate the implementation strategy with Mark Kreiter, CRGNSA hydrologist.
3. 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.
4. 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.
5. 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 item 1-10 above. This decision expires on August 06, 2010. 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](mailto:dlross@fs.fed.us).

*/s/ Daniel T. Harkenrider*

DANIEL T. HARKENRIDER  
Area Manager

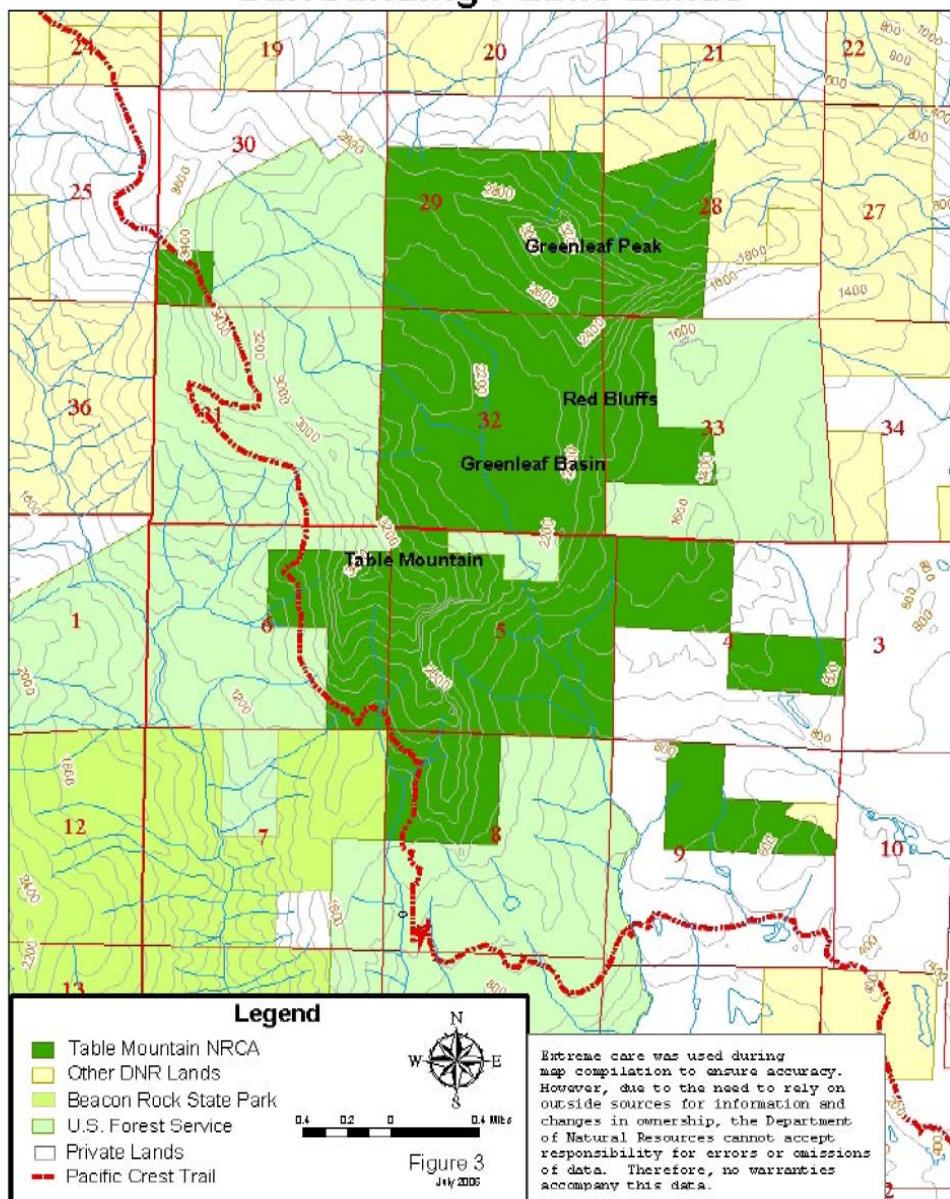
Date: August 06, 2008

cc: Jill Arens, Columbia River Gorge Commission;  
Rick Till, Friends of the Columbia River Gorge

## FINDINGS OF FACT

<b>LANDOWNER:</b>	Washington State Dept of Natural Resources
<b>PROPOSED ACTION:</b>	Road Abandonment
<b>LOCATION:</b>	Skamania County, Washington. Township 3N, Range 7E, Section 4, 5, 29,32 Taxlot: 400, 301,106, 4900                      Quad 7    UTM: 580919 5059394
<b>NATIONAL SCENIC AREA DESIGNATION:</b>	Special Management Area (SMA)
<b>LAND USE DESIGNATION:</b>	Forest and Open Space
<b>LANDSCAPE SETTING:</b>	Coniferous Woodlands and Gorge Walls, Canyonlands, Wildlands

### Table Mountain NRCA and Surrounding Public Lands



## **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***

One comment letter was received during the comment period which began with a public notice dated May 5, 2008. Friends of the Columbia Gorge commented on June 3, 2008. They were in support of the project but concerned that it must follow the Management Plan guidelines, and that a complete application be submitted. These comments are addressed in the findings for the applicable guidelines below.

### ***B. Project Proposal***

The objective of this project is to abandon 2.5 miles of road in the Table Mountain Natural Resources Conservation Area (NRCA) and 1.7 miles at Columbia Falls NAP, (See Figure 1 and 2). Sections of the road to be abandoned run through patches of old growth forest while other sections traverse older natural forest that regenerated after the Yacolt Burn. The road to be decommissioned will utilize light abandonment techniques such as water barring and ripping with some limited pullback side-cast material. Two small log puncheons will be removed on Table Mountain NRCA.

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On August 1, 2008, the applicant contacted Diana Ross via e-mail to withdraw part of the application: "...we decided to drop the road abandonment project at Columbia Falls near Archer Mountain this year." This leaves the 2.5 miles of road in the Table Mountain Natural Resources Conservation Area (NRCA) as the entire project to be considered in this application.

### ***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.**
1. The Management Plan, Part II, Chapter 3 (Open Space) SMA Guidelines, Review Uses
  - B. Resource enhancement projects for the purpose of enhancing scenic, cultural, recreation and/or natural resources, subject to the guidelines in "Resource Enhancement Projects" (Part II, Chapter 7: General Policies and Guidelines). These projects may include vegetation management and forest practices (subject to the forest practice guidelines of Part II, Chapter 2: Forest Land)**

The Management Plan, Part II, Chapter 7 (General Policies and Guidelines) GMA/SMA Guidelines, Review Uses

1. **Applications for resource enhancement projects must describe the goals and benefits of the proposed enhancement project. They must also thoroughly document the condition of the resource before and after the proposed enhancement project.**

**Findings:** The project, as adequately described in the project description document, is a forest practice, an allowed use in the Forest zone and allowed in Open Space if it is a resource enhancement. 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, (emphasis added) reforestation, fertilizing, brush control, prevention of wildfire, and suppression of diseases and insects..." The road abandonment project is also a resource enhancement because the project, according to the applicant, "will also ultimately benefit the rare features these sites were established to protect by reducing habitat fragmentation and by reducing human disturbance to wildlife". Thus, the project is an allowed use under the Management Plan.

## D. Scenic Resources

1. 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.

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
Gorge Walls, Canyonlands, Wildlands	Forest, Agriculture, Public Recreation, Open Space	Not Visually Evident

**Findings:** The project area is located in the Forest land use designation and Open Space land use designations. The scenic standard that the project will meet is visually not evident from Key Viewing Areas (KVAs) which is defined as **“Not visually evident (SMA): A visual quality standard that provides for development or uses that are not visually noticeable to the casual visitor. Developments or uses shall only repeat form, line, color, and texture that are frequently found in the natural landscape, while changes in their qualities of size, amount, intensity, direction, pattern, etc., shall not be noticeable”**.

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			
SR-14			<b>X</b>
I-84			<b>X</b>
Historic Columbia River Hwy			<b>X</b>
Sandy River			
Pacific Crest Trail		<b>X</b>	<b>X</b>
Portland Women’s Forum			
Crown Point			
Rooster Rock State Park			
Larch Mtn. Road			<b>X</b>

<u>KEY VIEWING AREA</u>	<u>DISTANCE ZONE</u>	<u>KEY VIEWING AREA</u>	<u>DISTANCE ZONE</u>
	FOREGROUND 0-1/4 Mile	MIDDLEGROUND 1/4 to 3 Miles	BACKGROUND Over 3 Miles
Larch Mountain			X
Larch Mtn. Sherrard Point			X
Cape Horn			
Bridal Veil State Park			
Multnomah Falls			
Bonneville Dam Visitor Center		X	
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 because it is visible mostly in the Background distance zones. In addition, the project will benefit scenic resources by allowing the subject road to revegetate over time. There will be no short term scenic impacts to scenic resources due to distance from KVAs, the nature of the project (both its size and intensity) and the existing high level of vegetative screening from all Key Viewing Areas.

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

**Findings:** No created openings are proposed.

**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.**

- E. Gorge Walls, Canyonlands, and Wildlands: New developments and land uses shall retain the overall visual character of the natural-appearing landscape.**
- (1) **Structures, including signs, shall have a rustic appearance, use nonreflective materials, have low contrast with the surrounding landscape, and be of a Cascadian architectural style.**
  - (2) **Temporary roads shall be promptly closed and revegetated.**
  - (3) **New utilities shall be below ground surface, where feasible.**
  - (4) **Use of plant species non-native to the Columbia River Gorge shall not be allowed.**

**Findings** The project is within the Coniferous Forest and Gorge Walls, Canyonlands, and Wildlands landscape settings. No buildings, temporary roads, or new utilities are proposed. The proposed waterbars will have a rustic appearance. No non-native species are proposed to be planted. Therefore, the project meets the landscape setting criteria.

### ***E. Cultural Resources***

1. 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 May 5, 2008. No comments were received. The CRGNSA archeologist, Marge Dryden, states in her July 31, 2008 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: Not required.  
Historic Survey: Not Required.”

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:** The proposal will remove a few small trees to facilitate the road abandonment work only if absolutely necessary. This will not affect the existing forest stand structure.

**(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:** The proposal is not a silvicultural prescription. It is a road abandonment project. As such, the desired forest structure and pattern table does not apply because the existing stand structure will not change.

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 proposed road abandonment is located on the ridge above Greenleaf Basin. As such it is within the buffer of Greenleaf Creek and other smaller drainages in the area in isolated portions. The no-practicable alternatives test reveals that since the project is designed to enhance these resources and reduce human impact to them in this area over time, there is no benefit to an alternative location for the project outside of these buffers. The project will, over time, obliterate an existing road that was historically located within these buffers at isolated points.

The project was designed to reduce the existing impacts to wildlife and plant resources by installing waterbars and allowing the roads to naturally revegetate. CRGNSA biologist Chuti Fiedler stated on July 30, 2008 that the project will be within the priority habitat of old growth conifer and that it has a low likelihood of adverse effects because the activity is controllable with no adverse effects to sensitive habitat or populations expected. According to the applicant, the project itself is designed as an enhancement to these resources.

The project is within 1,000 feet of a population of sensitive plants near the top of Table Mountain. Robin Dobson, CRGNSA ecologist stated on August 5, 2008 that there is no suitable habitat for this species in the shaded coniferous forest where the road is located.

Therefore, there are no expected adverse effects to sensitive wildlife, plants, or water resources and the project meets the above criteria.

### 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 following condition should be applied to ensure that the above criteria are met: Areas where post implementation 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.

### *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 will not significantly displace existing lawful recreation use or create adverse effects due to project design and location. The project is intended to reduce the occurrence of off-road vehicle use, structure building, dumping, and other illegal uses. CRGNSA recreation planner Sue Baker stated that users who wish “to have a non-motorized experience can still hike the old road bed.”

## ***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.