

Plan Review

SMA Forest Track

SMA Forest Provisions Issues and Options

October 31, 2003

Introduction

The following document is a summary of the SMA Forest issues and policy options, public comment on the options, and the Area Manager's decision and rationale concerning the chosen option and associated revision. This document also summarizes the decisions and rationale for SMA Open Space provisions affected by the SMA Forest revisions, and proposed changes and additions to the Management Plan Glossary. Attached as a separate document is the entire text of the proposed SMA Forest Provisions and Glossary changes with annotations.

Explanations are in Red, existing language is in black, and **proposed new language is green**.

The Forest Service is interested in your comments on these proposed revisions. We are taking comments until November 17, 2003. You may address comments to Dan Harkenrider at dharkenrider@fs.fed.us, or mail to 902 Wasco, Suite 200, Hood River, Oregon 97031. Decisions on these proposals are expected in late November.

You may contact Diana Ross with questions or for further information. She may be reached at dlross@fs.fed.us or (541) 308-1716.

Issue 1: Conversion of Forest use to Agriculture use

The Management Plan Policy 13, SMA Forest, states: "Conversions of lands designated Non-federal or Federal Forest to Agriculture or Open Space is allowed." The policy is based on Section 6(D)2 of the Scenic Area Act that states: "protect and enhance forest lands for forest uses and to allow, but not require, conversion of forest lands to agricultural lands, recreation development or open spaces." There are currently no guidelines to implement this policy and therefore no clear process for implementation when requests for these conversions are made.

In addition to the lack of guidelines for policy implementation, there is also an issue concerning implementation of the policy. The Forest Service does not interpret the Act as requiring a land use designation amendment for every use conversion. However, there is disagreement about this interpretation. Some believe the Act was referring to changing land use designations rather than uses.

Converting forested land to agricultural use involves two steps that may impact the scenic, cultural, natural, or recreational resources of the CRGNSA:

- Clearing forested land, and
- New agricultural use with or without new cultivation.

Clearing Forested land

There are currently no guidelines written for the protection of resources when tree removal is necessary in order to create a clearing for a future agricultural use. The existing forest practice guidelines cannot be followed because they were written with the assumption that all forest practices would occur in the context of a continued forest use. For example, the current forest practice guidelines require down wood, snags, and leave trees. This would make uses such as orchards and vineyards difficult. The current guidelines also limit opening size to a maximum of 15 acres or 5 acres in the foregrounds of Key Viewing Areas. These size limitations were not intended to cover clearings for agricultural use and may cause problems when applied to agricultural use.

New Agricultural use

If the current forest practice guidelines do not apply to conversions, how do the allowed agricultural uses for SMA Forest lands fit into the landscape? What, if any, size limitations are appropriate for the necessary clearings and what other guidelines should apply? What type of review is appropriate and how can we ensure that the land will subsequently be used for agriculture?

Issue 1 POLICY OPTIONS:

- A. Follow SMA forest practice guidelines and only allow conversion to those agricultural uses that fit into the resulting clearings (such as raising livestock). Add policy statement clarifying that a land use designation change from Forest to Agriculture would be required for areas where more extensive landscape changes would be necessary.**
- B. Use a clearing size limit as a guide to the scale of agriculture that would be allowed. For example, allow complete removal of tree species, down wood, snags, etc. for an area no larger than would be allowed for a forest practice opening. This is different than option A because it would allow for a wider range of agricultural uses to occur. This forest practice review would have to occur at the same time the new agricultural use was reviewed. It would be a one-step process and would contain guidelines explaining that the use must be connected to a proposed agricultural use allowed in the SMA agriculture provisions.**
- C. Treat conversions from forest to agricultural use as any other use and review in one step to meet cultural, natural, scenic, and recreational guidelines. No particular size limits would be imposed. Impacts to resources by the specific proposal would guide the size and type of agriculture allowed.**
- D. Require development and review by the Forest Service of a Stewardship Plan (see page 7 of this document) (replace site plan requirements for site plan on page II-38).**

Public Comments: The Forest Service received 15 comments on this issue, from Clark and Skamania County Planning, The Columbia River Gorge Commission staff, Steven Hartsell of Washington DNR (representing himself only), Friends of the Columbia Gorge, 8 comments similar in content to the Friends comments, the Columbia Gorge Institute, and Oregon Department of Forestry (ODF).

The Gorge Commission and Steven Hartsell preferred Option C while Skamania County and ODF preferred Option D. Clark County preferred Option B. The Friends and the Gorge Institute commented that conversions are only allowed under the Scenic Area Act as land use designation changes rather than use changes.

Forest Service Response: We understand the concern that the Scenic Area Act may be interpreted by some as not allowing use conversions without a land use designation change. However, the Management Plan already allows all the agricultural uses allowed under the Agriculture land use designation in the Forest land use designation, and all the forest uses in the Agriculture land use designation. A land use designation change requirement for conversions would require an unnecessary and lengthy amendment process and would result in “spot” zoning. The issue to be resolved is that new agricultural uses are currently allowed outright, protections for scenic, cultural, natural and recreation resources are absent, and there is no mechanism to ensure that agriculture will be the end result of the forest land conversion.

The Forest Service understands that a preference for Option D is based on what the ODF comment describes as “a case-by-case strategy to maximize the flexibility of the options for both the landowners and the regulatory agencies to meet their respective objectives”. We also understood that preference for option C is based on both more flexibility than either A or B and more control on resource protection than Option D. We researched language that would combine the advantages of both.

Decision and Rationale: Propose the adoption of the following revisions using the concept of Option C and the Stewardship Plan requirement of Option D.

The following revision proposal allows conversions to agricultural use only in those areas that are able to meet resource protection guidelines and are suitable for agriculture based on Natural Resource Conservation Service (NRCS) soil unit descriptions. We believe that these revisions provide the best balance between supporting conversions while protecting the resources as required by the Act:

Review Uses

1. The following uses may be allowed subject to review for compliance with scenic, cultural, natural, and recreational resources guidelines. The use or development shall be sited to minimize the loss of land suitable for the production of forest products:
 - A. All review uses allowed for in Part II, Chapter 1: Agricultural Land.

- B. Forest practices in accordance with an approved forest practices application (See page xx for application requirements) and subject to the additional guidelines in this chapter ~~site plan~~.
- C. New cultivation or new agricultural use outside of previously disturbed and regularly worked fields or areas subject to compliance with guidelines for the protection of cultural resources (Part 1, Chapter 2: Cultural Resources) and natural resources (Part 1, Chapter 3).

The above guideline (C) is also proposed be added to public recreation and agriculture designations.

- D. Conversion from forest to agricultural use with the following steps and subject to the following additional guidelines:
 - 1. A Stewardship Plan shall be submitted and deemed complete by the Forest Service (See page xx for Stewardship Plan Requirements).
 - 2. After a 30-day public comment period, the Forest Service shall review the Stewardship Plan using the following criteria:
 - a. Scenic Resource guidelines 1.A and H in this chapter.
 - b. Applicable Chapter I Cultural, Natural and Recreational Resource guidelines.
 - c. The Natural Resource Conservation Service (NRCS) soil unit description shall indicate that soils are suitable for the proposed agricultural use. The woodland management tables shall be used as part of the analysis of suitability for both agriculture and forest uses.
 - d. The size, shape and pattern on the landscape of the clearing for the new agricultural use shall blend with the surrounding landscape pattern either because the existing pattern includes agricultural openings or because the new agricultural opening is designed to appear natural.
 - 3. The Forest Service shall send the review statement to the appropriate county planning office. The Forest Service shall state whether or not the conversion should proceed including any conditions for the conversion.
 - 4. The county will accept an application for new agriculture based on a use conversion on forest lands after receipt of a positive review statement from the Forest Service.
 - 5. The forest practice portion of the conversion shall not be approved by the state forestry department or county until a decision on the new agricultural use is issued from the county.
 - 6. If the conversion is not complete within two years of the time frame described in the approved Stewardship Plan, reforestation in accordance with state forestry requirements shall be required.

Issue 2: Scenic Resource Protection

The scenic guidelines are based on prescriptive requirements such as clearing size limits, percentage cleared of ownership within viewsheds, dispersal of created openings, etc. These guidelines are designed to preserve scenic resources but have been difficult to implement, confusing, and have led to a perception of non-flexibility. They have also, in some cases, conflicted with forest management goals because they do not take into account the various plant communities in the CRGNSA. The current guidelines are listed below. *Comments in italics indicate the issue with each guideline:*

1. For forest practices, the following guidelines shall apply:
 - A. Forest practices shall meet the design guidelines and VQO for the landscape setting designated for the management area. *No issues.*
 - B. Not more than 16 percent of each total ownership within a viewshed shall be in created openings at any one time. The viewshed boundaries shall be delineated by the Forest Service. *(This guideline was meant to reduce cumulative effects from multiple openings in one viewshed. The problem is that viewsheds overlap one another in the CRGNSA. Sixteen percent was the guide used by the Forest Service for the Visual Quality Objective of Partial Retention—management activities are evident to the observer but do not dominate the natural landscape. It was intended to control cumulative effects for high contrast openings within a forest of continuous canopy).*
 - C. Size, shape, and dispersal of created openings shall maintain the natural patterns in the landscape. *(Forest tree stand structure—tree spacing, species, sizes-- should be mentioned as well).*
 - D. The maximum size of any created opening shall be 15 acres. In the foreground of key viewing areas, the maximum size of created openings shall be 5 acres. *(This guideline may be restrictive for applying some types of forest management and in some areas that are not visible from Key Viewing Areas).*
 - E. Clearcutting shall not be used as a harvest practice on land designated Federal Forest. *(No longer a helpful guideline. Created openings on Federal Land are required by other Federal laws to retain snags and leave trees. Outdated terminology that seems to preclude openings-- which are a necessary part of forest ecosystems).*
 - F. Created openings shall not create a break or opening in the vegetation in the skyline as viewed from a key viewing area. *No issues.*
 - G. Created openings shall be dispersed to maintain at least 400 feet of closed canopy between openings. Closed canopy shall be at least 20 feet tall. *(This guideline is the most inflexible. It tends to contradict guideline C in that it encourages unnatural regular spacing between openings. It was intended to prevent the collection of smaller openings into larger ones and to prevent forest fragmentation. Four hundred feet is not enough closed canopy to prevent forest fragmentation. "Closed" canopy was not defined. Guideline C may do better job of getting at the underlying concern).*

Issue 2 POLICY OPTIONS:

- A. Require that forest practices meet scenic standards for the landscape setting and zone and delete guidelines B, E, and G. Add a statement to guideline A requiring that no more than 16% of the composite viewshed (as viewed from Key Viewing Areas looking towards the proposed forest practice) of the Coniferous Woodland landscape setting shall be in created openings at one time. Add a guideline requiring a Stewardship Plan if the proposed prescription does not fit the remaining guidelines. Develop a handbook describing how forest practices can be designed to meet scenic and natural resource guidelines.**
- B. Require that forest practices meet scenic standards for the landscape setting and zone and delete guidelines B, E, and G. Replace with guidelines that describe how a created opening or thinning can be made to look natural.**
- C. Require a Stewardship Plan to be reviewed by the Forest Service. Replace specific guidelines with a handbook that describes how forest practices can be designed to meet scenic and natural resource guidelines. Require that forest practices meet scenic standards for the landscape setting and zone and delete guidelines B-G. Add a statement to guideline A requiring that the percentage of created openings visible at one time be within the natural range for the vegetation type within a given forested landscape setting.**
- D. Choose options 1C, 2B, and 3A for issues 1, 2 and 3. Choosing these options together will create some encouragement for an ecosystem-based forest management which will in turn create a more natural-appearing landscape.**
- E. Choose options 1D, 2C and 3A for issues 1, 2, and 3. Choosing these options together will create a high degree of encouragement for ecosystem-based forest management which will in turn create a more natural-appearing landscape.**
- F. No change**

Public Comments: The Forest Service received 14 comments on this issue, from Clark and Skamania County Planning, Friends of the Columbia Gorge, 8 comments similar in content to the Friends comments, the Columbia Gorge Institute, Oregon Department of Forestry (ODF), and Dean Apostol.

Except for a Clark County comment preferring Option B, the comments received on this issue were either strongly advocating more flexibility or more restrictions than currently are in place.

Skamania County Planning and ODF preferred the flexibility of case by case review of a Stewardship Plan combined with requiring that forest practices meet scenic resource guidelines; although ODF thought that some of the requirements of the Stewardship Plan would be too complex for some landowners or foresters.

The Friends and the Gorge Institute were strongly against deleting the current guideline 1.E, prohibiting clearcutting on federal lands and further advocated no clearcutting in the SMA based on scenic resource cumulative effects of GMA forest practices and the effects of large forest opening in some foregrounds and middlegrounds.

Friends also supports prohibiting all logging on lands designated or suitable for Open Space stating they “should be managed as wilderness: ‘an area where the earth and its community of life are untrammelled by man’” and replacing the cumulative effect percentage of 16% to one that correlates with the visual quality objective of retention.

Dean Apostol recognized the need for managing forests in a “manner that is consistent with local ecosystems...” but felt that because scenic resources and ecosystem management may not be entirely compatible and because the forests of the Gorge are largely mid-seral and not due for stand replacement, “Forest managers should be able to limit their silvicultural work for many decades to density management, perhaps with occasional small gaps to increase diversity.”

Forest Service Response: The National Scenic Area has a special mission within the Forest Service. We are administratively withdrawn from scheduled timber harvesting. This means that the only reason we would consider managing the federal forests in the Scenic Area would be to respond to ecosystem health issues in order to protect the forest. We have a responsibility to consider what will protect our scenic and natural resources from wildfire. We have human settlement on the edge of our forests. These are management concerns that require a careful balance of natural systems and human stewardship. We agree with, respect, and will address concerns regarding the protection of the resources as required by the Scenic Area Act and Management Plan.

The proposal for deletion of guideline E (clearcutting) on federal lands was based mostly on removing an outdated term that is evocative of harvesting that would be impossible considering all the guidelines in the Management Plan and other federal laws in place for protection of resources. It does not represent a large policy change on federal lands. It does recognize the possibility that there may be some cases where a forest opening larger than one acre may be in the best interests of all resources, including scenic resources in the long term.

We agree that on National Forest lands on the west side of the Gorge silvicultural prescriptions would most likely be thinning to create large tree character and old growth conditions but we currently do not have adequate stand data available to conclude that we would never need to create an opening larger than one acre.

Regarding forests throughout the SMA, we believe that if forest practices are required to meet scenic standards and are limited as to percentages of disturbances allowed at one time, the scenic resource will be protected. We agree that the 16% cumulative effect limit should not apply to areas with a scenic standard of Not Visually Evident (Retention) and that opening sizes should have limits depending on the natural disturbance regime of the vegetation type and scenic resource protection. For example, the current 15 acre limit is too large for Ponderosa pine/ Oregon Oak and the East Conifer vegetation types in the Gorge.

Decision and Rationale: Propose the adoption of the following revisions using the concept of Option A and add a statement to guideline 1.A requiring that the percentage of created openings visible at one time be within the natural range for the vegetation type within a given forested landscape setting from Option C to apply to the Coniferous Woodland landscape setting east of the White Salmon River and all other landscape settings. Adjust cumulative effects percentages to reflect areas with the scenic standard of Not Visually Evident (Retention).

In addition, the Forest Service proposes to add a policy statement in the Forest Land chapter to the effect that forest management of National Forest lands in the Scenic Area is for the purpose of ecosystem management and forest health. (see Policy Issue 2 page 18.)

Scenic Resource Guidelines for Forest Practices

These guidelines were moved from the existing Chapter I, SMA Scenic Resource Provisions to the SMA Forest Chapter in order to keep most of the guidelines applicable only to forest practices together in one Chapter.

1. For forest practices, the following guidelines shall apply:
 - A. Forest practices shall meet the design guidelines and ~~VQO~~ scenic standards for the applicable landscape setting ~~designated for the management area and zone~~ (See Required SMA Scenic Standards table, SMA Guidelines for Development Visible from KVAs, SMA Scenic Resource Provisions, Chapter I page xx).
 - B. In the western portion (to White Salmon River) of the SMA Coniferous Woodland Landscape Setting, no more than 16% 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 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. (Mostly effects federal lands)
 - 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 Natural Resources guidelines 1.A-C on page xx 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 Natural Resources guidelines 1.A-C on page xx in this chapter.

- G. The maximum size of any created forest opening shall be 15 acres. In the foreground of key viewing areas, the maximum size of created forest openings shall be 5 acres.
 - a. If the treatment is proposed to go beyond the above guideline based on forest health or ecosystem function requirements, a Stewardship Plan shall be required.
 - b. If the Stewardship Plan proves that the above guideline is detrimental to either forest health or ecosystem function, the size of the created forest opening shall be within the natural range for the vegetation type as set forth in the Natural Resources guidelines 1.A-C on page xx in this Chapter and shall maintain scenic standards.
- ~~H. Clearcutting shall not be used as a harvest practice on land designated Federal Forest.~~
- H. Created forest openings shall not create a break or opening in the vegetation in the skyline as viewed from a key viewing area.
- I. ~~Created openings shall be dispersed to maintain at least 400 feet of closed canopy between openings. Closed canopy shall be at least 20 feet tall.~~ (Replaced by Desired Forest Structure and Pattern Table on p. 14).

Issue 3: Natural Resources--Leave Tree, Snag, and Down Wood Requirements

The natural resource guidelines are outdated in some cases, and through oversight have not entirely carried out intended policy. For example, the biodiversity section only mentions the oak woodland plant community. The down wood requirements are listed in tons which is very difficult for forest managers to interpret and comply with. The leave tree, snag, and down wood requirements do not change per vegetation type or plant community. The current guidelines at issue are listed below. *Comments in italics indicate the issue with each guideline:*

1. Forest practices shall maintain the following:
 - A. Six live trees per acre, three of which shall be of the largest tree size available and three of which shall be of various sizes to provide replacements as snags and wildlife trees; and three dead trees per acre, of the largest tree size available; and three down trees per acre, of the largest tree size available. All trees shall be unburned. *(This guideline does not reflect the vegetation changes across the CRGNSA. It is also outdated because many snag, down wood, and leave tree studies have been completed since this guideline was written).*

In areas with mixed oak and conifer stands, at least one of the three dead trees per acre shall be an oak snag of the largest tree size, and one additional live conifer per acre of 16-inch dbh (diameter at breast height) or greater, preferably with limbs down to the ground, shall be maintained. *(Same comment as for 1.A above.)*

- a. Snags and wildlife trees shall be maintained either as clumps or evenly distributed over the forest practice area. *(Evenly distributed may not be a natural pattern).*
- b. Down logs shall be relatively solid, and no area greater than 2 acres in size and capable of supporting forested conditions shall be without a minimum of two down logs. *(Same comment as for 1.A above.)*
- B. Biodiversity
 1. New uses shall avoid disturbance to old growth forests. *(No issues)*
 2. Forest practices shall maintain species composition at existing proportions in the activity area. *(No issues)*
- C. Forest practices in areas with existing oak species shall maintain a minimum of 25-square-foot basal area per acre of oak in areas with predominantly oak trees of 1-foot dbh or more, or maintain a minimum 40 percent oak canopy cover per 40 acres, in which 10 trees per acre must be of the largest tree size, in areas with predominantly oak trees less than 1 foot dbh. No area greater than 10 acres in size and supporting existing oak species shall be devoid of oak trees. *(Same comment as for 1.A above.)*
- D. A mix in age and size of hardwoods shall be maintained to provide for vertical diversity and replacement. *(No issues)*
- E. For revegetation purposes, only plant species native to the Columbia River Gorge shall be encouraged. *(No issues)*

- F. Forest practices shall maintain the following: *(Same comment as for 1.A above. Also difficult to implement because tons are not easy to measure on the ground.)*
1. Soil organic matter shall be provided at a minimum of 15 tons per acre and 25 tons per acre of dead and down woody material in the eastside and westside vegetation communities, respectively.

Issue 3 POLICY OPTIONS:

- A. Delete guidelines A,C, and F and replace with a chart containing the vegetation type and the canopy closure recommended for overstory remnants in a created forest opening based on the natural range for the vegetation type. Typical sizes, shapes, and landscape pattern for forest openings should also be included. Down wood and snags should be based on Dec-Aid—, the Decayed Wood Advisor for Managing Snags, Partially Dead Trees, and Down Wood for Biodiversity in Forests of Washington and Oregon**

(See:

http://www.fs.fed.us/wildecology/decaid/decaid_background/decaid_home.htm).

- B. No change**

Public Comments: The Forest Service received 12 comments on this issue, from Clark and Skamania County Planning, Friends of the Columbia Gorge, 8 comments similar in content to the Friends comments, and Oregon Department of Forestry (ODF).

Clark and Skamania County preferred option A and Friends supported updating snag, downed wood and leave tree requirements to “reflect advances in the understanding of forest ecology”.

ODF preferred no particular option stating that “we question the need to address the issue of down wood retention. This seems to go well beyond the requirements necessary for preservation of scenic resources and is duplicative of existing resource protection provided by state forest practices regulations”.

Forest Service Response: We believe that it is important that the Management Plan control the application of forest practices with respect to forest stand structure and pattern because it is the physical manifestation of natural processes to be maintained in order to support forest health, wildlife habitat as well as scenic resources. The Management Plan is the guiding document for federal forests as well as state lands. There should be a baseline of protection (despite possible duplication) to protect against possible changes in state regulations.

Decision and Rationale: Propose the adoption of the following revisions using the concept of Option A. Allow some exceptions based on forest health as supported by a Stewardship Plan.

The following revision proposal updates and clarifies snag, downed wood and leave tree requirements and adds the other forest stand structure and pattern components necessary to define a forest practice in terms of natural variability and scenic resource protection:

Natural Resource Guidelines for Forest Practices

1. Forest practices shall maintain the following in addition to applicable natural resources guidelines in Chapter I:

~~1. Six live trees per acre, three of which shall be of the largest tree size available and three of which shall be of various sizes to provide replacements as snags and wildlife trees; and three dead trees per acre, of the largest tree size available; and three down trees per acre, of the largest tree size available. All trees shall be unburned.~~

~~In areas with mixed oak and conifer stands, at least one of the three dead trees per acre shall be an oak snag of the largest tree size, and one additional live conifer per acre of 16 inch dbh (diameter at breast height) or greater, preferably with limbs down to the ground, shall be maintained.~~

~~2. Snags and wildlife trees shall be maintained either as clumps or evenly distributed over the forest practice area.~~

~~3. Down logs shall be relatively solid, and no area greater than 2 acres in size and capable of supporting forested conditions shall be without a minimum of two down logs.~~

- A. Silvicultural prescriptions shall maintain the desired natural forest stand structures (tree species, spacing, layering, and mixture of sizes) based on forest health and ecosystem function requirements. Forest tree stand structure shall meet the requirements listed in the Desired Forest Structure and Pattern Table for each vegetation type. Forest tree stand structure is defined as the general structure of the forest in each vegetation type within which is found forest openings.
- B. Created forest openings shall be designed as mosaics not to exceed the limits defined as Desired in the Desired Forest Structure and Pattern Table.
- C. Snag and down wood requirements shall be maintained as listed in the Desired Forest Structure and Pattern Table for each vegetation type.
- D. If the treatment is proposed to deviate from the above guidelines based on forest health or ecosystem function requirements, a Stewardship Plan shall be required and shall show and prove why a deviation from the above guidelines is required.
- E. The Stewardship Plan proposal shall not fall outside the natural range for the vegetation type as set forth in the Desired Forest Structure and Pattern Table columns 2, 3, 5 and 6 and shall not violate scenic resource standards and guidelines.

DESIRED FOREST STRUCTURE AND PATTERN
(Based on historic natural range of variability and scenic protection)

Vegetation Type [#]	Forest Structure (Average % total canopy closure) ¹	Typical Forest Opening s Size Disturbance caused ²		Percent Openings at One Time ²		Leave Trees (as % of created forest openings)	Average Down Wood* No. of pieces 30 ft long per acre (scattered)	Average Snags* No. per acre Snags are 40 ft in height.
		Historic (Natural)	Desired	Historic (Natural) (by vegetation type)	Desired			
West Conifer	60-80% Understory layer variable	Variable After catastrophic fire openings would be many and very large (up to 100's of acres)	Retain forested character. Allow for openings up to 15 acres. Openings have 15-<40 % canopy closure. Widely Dispersed	Variable sizes with mosaic pattern, irregular shapes 10 – 55% Intense fire return interval is 300 yrs	Mosaic, irregular shapes, not to exceed 16% for west Coniferous Woodland and 4% Canyonlands	15 % to be left in clumps including 3 trees per leave acre of the largest size trees available	100 to 150 pieces >5"<20" dbh and 18 to 25 pieces >20" dbh	10 at >10"< 20" dbh and 7 at >20" dbh
East Conifer (Ponderosa Pine/Douglas fir)	40-80% Understory layer <25%	Few Openings due to low intensity fires. ¼ to 2 acres	<1 acre Openings have 0-<40% canopy closure Widely dispersed	1 -10%	1 - 10% (% By vegetation type)	No leave trees required	6 - 10 pieces > 5" <20" dbh and 3 to 6 pieces >20" dbh	5 at >10" <20" dbh and 3 at >20" dbh
Ponderosa pine/ Oregon Oak	25-60% Understory layer =>25%	Most natural openings due to poor soil. Disturbance openings few	<1 acre Openings have 0-<25% canopy closure Widely dispersed	1 -10%	1 - 10% (% By vegetation type)	No leave trees required	5 to 10 pieces >5"<20" dbh and 1 to 3 pieces >20" dbh	10 at >10" <20" dbh and 10 at >20" dbh Oak snags can be counted if already dead.

Map available

*Assumptions: Data from DecAID did not include fire as an integral part of the ecosystem. Therefore, specific changes were made to the Table above to account for this in the vegetation types that are known to have had frequent fire regimes (East Conifer and Ponderosa Pine/Oregon Oak). The data used was taken from the White River Late-Successional Reserve Assessment. The original data from DecAID is given below:

- a) For Down and Dead in East Conifer (ponderosa pine/Douglas fir) DecAID data was 24 pieces >5"<20" dbh and 4 pieces at >20" dbh (without fire)
- b) For Down and Dead in Ponderosa pine/Oregon Oak data from DecAID data was 78 pieces >5"<20" dbh and 8 pieces >20" dbh (without fire).
- c) For snags in East Conifer vegetation class the data from DecAID was 2.4 at >10" <20" dbh and 1.6 pieces at >20" dbh (without fire).
- d) For snags in ponderosa pine/Oregon oak vegetation class the DecAID data was 6.1 Pieces >10"<20" dbh and 6.5 pieces >20" dbh (without fire).

1. Does not apply to openings.

2. The data used for these entries was taken from the Regional Ecosystem Assessment Project (REAP, USDA Forest Service 1993) and from the White River Late-Successional Reserve Assessment (Mt Hood Nat. Forest, 1996)

Issue 4: Natural Resources-Site Plan Requirements

The requirement for the Site Plan on page II-38 do not adequately reflect and integrate with the requirements in the resource protection guidelines.

Issue 4 POLICY OPTIONS:

A. Replace site plan with a Stewardship Plan that requires the following at a minimum:

- 1) Outline the long term goals, proposed operations, and future sustainability of the subject forest.
- 2) Describe existing forest in terms of species, ages, sizes, landscape pattern, and canopy closure for all canopy layers.
- 3) Describe the long term goals for the forest using similar terms including any goals such as conversions to agricultural use.
- 4) Describe the management tools to be used to move toward long term goals.
- 5) Describe the condition of the forest in terms of species, ages, sizes, canopy closure for all canopy layers after the operation to be reviewed is complete.
- 6) Describe how it will meet scenic and natural resource guidelines. Detail the operation to be reviewed showing on a map or aerial photo skid roads, stream crossings, decking, access roads, yarding, slash treatment, etc.
- 7) Flag, stake or mark buffers, any trees or downed wood to be retained or removed (whichever makes the most sense), and areas for placing fill or removing material.

B. Rewrite site plan requirements after policy choices are made on issues 1-3. Do not require the development of a Stewardship Plan.

C. No change

Public Comments: The Forest Service received 3 comments on this issue, from Clark and Skamania County Planning and Oregon Department of Forestry (ODF).

The comments were supportive of Stewardship Plans but ODF commented that some of the requirements would be too complex for some applicants.

Forest Service Response: We agree that the Stewardship Plan is too complex to apply to every forest practice. We researched using the Stewardship Plan concept to support conversion proposals, and exceptions to certain requirements for scenic and natural resources.

Decision and Rationale: Develop language to adopt the Stewardship Plan concept to support conversion proposals and exceptions to certain requirements for scenic and natural resources and rewrite the site plan requirements to meet the needs of revision requirements.

The following revision proposal developed requirements for a site plan (application) for all forest practices and additional requirements for a Stewardship Plan in order to allow for complex forest practice applications requesting either conversions to agricultural use or exceptions for the purposes of forest health:

Forest Practice Application Requirements

1. The following information, in addition to general site plan requirements (see Part II, Chapter 7: General Policies and Guidelines) shall be required:
 - ~~A. Boundary of proposed commercial forest practice.~~
 - A. Delineate the following on a recent aerial photo or detailed map:
 1. ~~Harvest units.~~ The size, shape, and exact location of the proposed treatment area including any clumps of leave trees to remain. If more than one silvicultural prescription is to be used, code each on the photo.
 2. Other important natural features of the subject parcel such as steep areas, streams, wetlands, rock outcrops, etc.
 3. Road and structure construction and/or reconstruction ~~design~~ location.
 4. Location of proposed rock or aggregate sources.
 5. Major skid trails, landings, and yarding corridors.
 6. Commercial firewood cutting areas.
 7. Protection measures for scenic, cultural, natural, and recreation resources, such as road closures.
 - B. ~~Timber types.~~ Describe the existing forest in terms of species, ages, sizes, landscape pattern (including how it fits into the surrounding landscape pattern) and canopy closure for all canopy layers.
 - C. Describe how the forest practice will fit into the existing landscape pattern and how it will meet scenic and natural resource standards.
 - D. Written silvicultural prescriptions with projected post-treatment forest condition specified in terms of species, ages, sizes, landscape pattern (including how it fits into the surrounding landscape pattern) and canopy closure for all canopy layers.
 - E. Road and structure construction and/or reconstruction design.
 - F. Existing and proposed rock pit development plans.
 - G. A discussion of slash disposal methods.
 - H. A reforestation plan as reviewed by the appropriate state forest practices agency.
1. As part of the application, flag, stake or mark buffers, any trees or downed wood to be retained or removed (whichever makes the most sense), and areas for placing fill or removing material in preparation for a field visit by the reviewer.

Stewardship Plan Requirements

1. The following information, in addition to the applicable portions of the forest practice application requirements above and general site plan requirements (see Part II, Chapter 7: General Policies and Guidelines) shall be provided:
 - A. Outline the long term goals, proposed operations, and future sustainability of the subject parcel.
 - B. Describe the time frame and steps planned to reach the long term goals.
 - C. Submit NRCS soil unit descriptions and maps for each soil unit affected by the proposed clearing or treatment.
 - D. Describe how the proposed opening or treatment fits into the long term goals and sustainability of the parcel and/or forest health.

Proposed Policy Statement Changes

1. Commercial forest practices are not allowed in SMA Open Space.

The Management Plan currently prohibits commercial forest practices in SMA Open Space land use designations. The Forest Service interprets this policy as intending to prohibit those forest practices intending as a primary purpose to provide economic opportunity through the means of harvesting trees. We do not believe it was intended to prohibit vegetation management or forest practices intended to promote forest health.

Policy: 7. New developments and land uses not included in the Open Space guidelines, including commercial forest practices, most structural development, and intensive recreation development, shall be prohibited in Open Space areas.

Guideline: 4. The following new uses may be allowed subject to review for compliance with scenic, cultural, natural, and recreational resources guidelines:

- A. Changes in existing uses, including reconstruction, replacement, and expansion of existing structures and transportation facilities, except for commercial forest practices.
- B. Restoration and enhancement structures and/or activities including vegetation, scenic, cultural, soil, fish and wildlife habitat restoration and enhancements.

Guideline 4B was revised during the land use Plan Review track this spring:

- B. Resource enhancement projects for the purpose of enhancing scenic, cultural, recreation and/or natural resources. Enhancement projects may include new structures (e.g., fish ladders, sediment barriers) and/or activities (e.g., closing and revegetating unused roads). 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.

Issue 1 POLICY OPTIONS:

A. (1) Policy: 7. New developments and land uses not included in the Open Space guidelines, including commercial forest practices, most structural development, and intensive recreation development, shall be prohibited in Open Space areas. (Remains unchanged)

A. (2) Revise guideline 4 to:

4. The following new uses may be allowed subject to review for compliance with scenic, cultural, natural, and recreational resources guidelines:

- A. Changes in existing uses, including reconstruction, replacement, and expansion of existing structures and transportation facilities, except for commercial forest practices.

- B. Resource enhancement projects for the purpose of enhancing scenic, cultural, recreation and/or natural resources. Enhancement projects may include vegetation management and forest practices for the restoration of forest health, new structures (e.g., fish ladders, sediment barriers) and/or activities (e.g., closing and revegetating unused roads). 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.

B. No change

Public Comments: The Forest Service received 11 comments on this issue, from Clark and Skamania County Planning, Friends of the Columbia Gorge, and 8 comments similar in content to the Friends comments.

Clark and Skamania County supports Option A, and Friends appeared to support Option B stating “Friends recommends prohibiting timber harvest on lands zoned Open Space” perhaps with a clarification that all logging regardless of the goal, be prohibited based on their statement regarding managing Open Space lands “as wilderness”.

Forest Service Response: It could be argued that this is a policy change or it could be interpreted as a policy clarification because the proposed revision does not allow any forest practices without a restoration (forest health) goal. This complicates interpretation of the Friends’ comments. We agree that commercial timber “harvest” should be prohibited on lands zoned Open Space. However, vegetation management is currently allowed in SMA Open Space for purposes of restoration and enhancement. (“Restoration and enhancement structures and/or activities including vegetation, scenic, cultural, soil, fish and wildlife habitat restoration and enhancements” is a current Review Use in SMA Open Space). The proposed revision clarifies that activities that may be considered “forest practices”, such as thinning to promote old growth forest, are also allowed in SMA Open Space. The forest practices would only be allowed as a tool to accomplish restoration needs. Forest practices with the objective of commercial timber harvest would not be allowed.

Decision and Rationale: Propose the adoption of the following revisions using the concept of Option A.

The revision proposal as written under Option A clarifies that vegetation management, including forest practices, is allowed to accomplish restoration needs. Forest practices with the objective of commercial timber harvest would not be allowed. This revision allows a careful balance of natural systems and human stewardship. Policy #7 (“New developments and land uses not included in the Open Space guidelines, including commercial forest practices, most structural development, and intensive recreation development, shall be prohibited in Open Space areas”) remains unchanged.

2. No current policy statement to support policy decisions for Issues 2 (Scenic Resource Protection) and 3 (Natural Resources)

The following revision proposal allows some flexibility for adjusting forest practices to the natural variations inherent to a particular vegetation type while protecting scenic resources by requiring that forest practices meet scenic standards, limiting cumulative effects based on scenic standards, and limiting opening sizes:

Proposed SMA Forest Land Policy 21 (new): Forest management of National Forest lands shall be for the purpose of ecosystem management and forest health.

Glossary

The following are proposals for new Management Plan glossary additions or revisions for purposes of clarification.

Delete the following Clearcut definition: **Clearcut:** A created opening of 1 acre or more.

Revise **Created opening (SMA):** A created forest opening with less than 80 percent crown cover closure of trees averaging less than 20 feet tall.

To: **Created opening (SMA):** A created forest opening with less than 40% average canopy closure of overstory trees and less than 70% average canopy closure of understory trees averaging less than 5" diameter at breast height for coniferous forests and less than 25% total canopy cover for oak woodlands. This definition does not include agricultural fields.

Add: **Characteristic Landscape(SMA):** The naturally established landscape within a scene or scenes being viewed. The scenic standard (the goal for the landscape being viewed) is measured against the degree of alteration from the naturally established landscape—rather than the existing condition or any other type of developed characteristic.

Add: **Forest Practice (SMA):** 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 removal of hazardous trees within 1.5 tree lengths along roads, recreation trails, residences, or other developments is excluded. Uses that include establishment, management or harvest of Christmas trees, nursery stock, or fiber producing tree species requiring intensive cultivation (irrigation, fertilization, etc.) and a harvest rotation of 12 years or less are considered agricultural uses.

Add: **Forest Health (SMA):** A measure of the robustness of forest ecosystems. Forests are deemed healthy when they have capacity across the landscape for renewal, for the maintenance of wildlife habitats, for recovery from a wide range of disturbances, and for retention of their resilience.

Add: **Hazard Tree (SMA):** A tree with a structural defect that will predictably result in whole or partial failure within 1.5 tree lengths of a road or maintained development. A defective tree is hazardous only when its failure could result in danger to people or damage to structures, vehicles, or other property.

Add: **Mosaic (SMA):** The dispersal of overstory and understory leave trees in irregularly spaced clumps of varying sizes throughout an irregularly shaped created forest opening.

Add: **Thinning (SMA):** A forest practice intended to create favorable conditions for the continued growth of trees within an existing stand of trees. A thinning becomes a forest opening in coniferous forests when the average canopy closure of the overstory layer is zero or less than 40% and the understory layer is less than 70% average canopy closure of trees averaging less than 5" diameter at breast height. A thinning becomes a forest opening in oak woodlands when the total average canopy closure is less than 25%.