

Decision Notice
& Finding of No Significant Impact

Bear Creek Saddle

USDA Forest Service
Pacific Ranger District, Olympic National Forest
Clallam County, Washington

Decision and Reasons for the Decision

Background

I have decided to approve commercial thinning of approximately 1,718 acres of 45- to 60-year-old plantations in the Middle Sol Duc, Deep Creek, and West Twin River watersheds. The thinning would occur roughly along the Bear Creek West Twin Road (Forest Service Road 30) and to the north of the Bear Creek Road. The legal land description for this project is T30N, R10W, Secs. 3, 4, 7-9, and 18; T30N, R11W, Secs. 10-15, 17, 19; and T30N, R12W, Secs 23 and 24.

The thinning prescription follows ecosystem management policies and scientific recommendations. Some road development would be required to efficiently access the stands.

Management direction for the project is contained in the 1990 *Olympic National Forest Land and Resource Management Plan* (LRMP) as amended by the 1994 *Record of Decision (ROD) for Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl*. The 1994 ROD, along with its Standards and Guidelines, is commonly known as the Northwest Forest Plan (NWFP).

The Soleduck Pilot Late-Successional Reserve (LSR) Assessment was completed in 1997 as required by the NWFP; the Bear Creek Saddle project follows recommendations in the assessment. The assessment recommended variable density thinning¹ within second growth stands (regenerated clearcuts) that are over-dense and lack diversity. Most of the stands in the Soleduck Pilot LSR that were clearcut harvested and broadcast burned are in this condition of lacking species diversity, having a single tree canopy layer, few down logs and snags, and high canopy closure.

The purpose of the thinning is to reduce forest stand density, increase forest stand complexity, and hasten the development of desired late-successional habitat elements such as large trees, multi-storied canopies, snags, coarse woody debris, and canopy gaps. These elements are lacking in the stands proposed for treatment in this project.

¹ Variable density thinning means selective cutting that leaves trees in a pattern that mimics natural stand diversity.

Decision

Based upon my review of all alternatives, I have decided to select Alternative B as described and analyzed in the Bear Creek Saddle Environmental Assessment (EA) and as modified in this Decision Notice.

Alternative B will be modified to respond to comments from the public and to reflect refinements in unit sizes, logging systems, and road use that were identified during site specific application of project design features and mitigation measures on some of the treatment units described in the EA. The preliminary project implementation work began after a previous decision for this project was made on September 15, 2006, but was halted when that decision was subsequently withdrawn. Before the previous decision was withdrawn, 25 of the 48 treatment units had some degree of preliminary implementation work completed. Overall Alternative B will be modified by reducing the total commercial thinning acres by 471 (a 22 percent acreage decrease from that presented in the EA), increasing the percentage use of helicopter logging systems (about an 8 percent increase), and reducing the amount of road needed for project implementation (about 1.7 miles less of closed Forest system, unclassified, and temporary roads). These modifications will result in less overall impacts to resources within the project area since there will be less road development and more low impact (helicopter) logging systems used. No effects beyond those disclosed in the EA are expected. Modification details are displayed in Appendix A to this document.

Alternative B (modified) will approve commercial thinning of 1,718 acres of second growth stands. Approximately 547 acres will be harvested by helicopter, 622 acres cable-logged, 476 acres ground-based logged, and 73 acres harvested using a combination of cable and ground-based logging. Thinning will be done by “thinning from below” where smaller diameter trees are removed to create additional growing space for the remaining larger trees. Approximately 120 to 180 trees per acre will remain in the post treatment stands, with a 60 to 90 percent crown closure, and an average diameter breast height (dbh) of at least 11 inches.

In the alder dominated or mixed alder/conifer stands, alder will be removed to release conifers while retaining a component of alder in the stand along with other hardwood species. Alder will remain in these stands to continue fixing nitrogen and provide wildlife benefits. Thinning will release understory conifers and facilitate development of large girth and canopy structures on the remaining alder. Patches of pure alder found in these stands will not be treated as part of this project.

Roads proposed for use include the following:

- 21.1 miles of existing, open Forest system roads
- 5.5 miles of Bonneville Power Administration (BPA) access roads
- 5.7 miles of closed Forest system roads which will be closed following project implementation
- 4.3 miles of unclassified, abandoned roads which will be used and treated as temporary roads, and will be decommissioned following project implementation
- 0.8 miles of new temporary road will be constructed and then decommissioned following project implementation

In making my decision, I carefully reviewed the NEPA analysis and public comments received on the EA. Several areas of concern were raised by the public, in some cases with specific concerns associated with certain units and roads. I instructed the project's interdisciplinary team to review these comments and provide me with recommendations to consider in making my decision. Considerable effort, including additional field review, was expended by the team in conducting their review. How my decision addresses public comment topics is described below. While my decision does not respond to all public comments as the commenter would like, I want to ensure those that provided the comments that I heard their concerns, and weighed them in light of the interdisciplinary team's recommendations and the project's Purpose and Need. In some instances I decided that it was important to implement the project as described in the EA in order to meet the project's goals.

Road Use

My decision reduces the use of a closed Forest system road (3100-010) by 0.4 mile from what was proposed in Alternative B as described in the EA. This reduction results in the two western most stream crossings in Unit 64 not being reconstructed, although they will remain a high priority for restoration work. There will also be a reduction of 1.2 miles in unclassified, abandoned roads used (both the 3000-382 and 3000-012 will not be used as proposed). The last modification is that a temporary road (3000-386) will not be constructed as a new BPA access road can be used in its place. Not constructing this temporary road means that there will be no new stream crossings associated with temporary roads constructed for this project.

Some commenters mentioned other roads that they would rather not see built. After reviewing the comments and the interdisciplinary team's recommendations, I decided to use these roads as described in Alternative B. These roads are generally in stable locations, avoid areas of high risk of instability, and have no direct delivery to the tributaries of Bear Creek. While there may be minor impacts on water quality from use of some of these roads, they are outweighed by the positive benefits of fixing drainage problems, restoring hillslope hydrology, and providing economical access to treatment units so the project's purpose can be achieved.

Riparian Forest and Older Forest Characteristics

My decision will implement the project design features and mitigation measures detailed in the EA (including riparian no-cut buffers and upper diameter cut limits in LSR) that were developed to protect the important resource values of these areas. Many of the 471 acres dropped during the preliminary implementation work from commercial thinning treatment were due to the amount and/or alignment of riparian areas and patches of older trees. For instance, the western portion of Unit 65 was dropped as project design features were applied on the ground due to the high percentage and alignment of riparian areas.

Alder Treatment

Comments on the project expressed concern about thinning mixed alder/conifer and pure alder stands in order to increase structural diversity and other components of late-successional habitat. This comment has been addressed in the EA appendix, "Response to Comments". I am confident that the proposed treatments in these stands will achieve the desired results, based on past experiences on the Forest and as supported by research. Additionally my decision will allow the continuation of a long term cooperative study (the Rainy Creek Biodiversity Project) with Peninsula College. This study is designed to evaluate the relative impacts of different silvicultural treatments, and includes treatments in alder dominated stands.

I examined the proposed thinning and related activities in relationship to the goals and objectives of the *Olympic Land and Resource Management Plan* (Forest Plan), as amended. I also considered the resource concerns noted in the watershed analyses and the EA. I considered the responsiveness of the alternatives to the significant issues, applicable laws, regulations and policy, Tribal Treaty rights, and public input. I considered the effects of implementing the action alternatives and the no action alternative on the physical, biological, social, and economic environment.

I believe that Alternative B (modified) provides the best balance among these considerations. Implementation of my decision meets the need for action and purpose of the proposed action, and is consistent with the goals, standards and guidelines of the Forest Plan, as amended. Implementing Alternative B (modified) with its mitigation measures will result in minimal impacts to resources, and provide long-term benefits to the resources.

Alternative B (modified) moves 1,718 acres toward the desired future condition identified in the Late-Successional Reserve Assessment and Watershed Analyses. This is the principal component of our purpose of and need for action.

Alternative B (modified) includes the reconstruction and appropriate closure of almost 6 miles of existing, closed Forest system roads. There will be a long-term watershed benefit from drainage improvements which will occur. This alternative also includes the reconstruction and eventual decommissioning of 4.3 miles of unclassified, abandoned roads. While there will be some short-term effects from ground disturbance associated with this activity, the longer term benefits of restoring hydrology, reducing surface erosion, and restoring function of riparian reserves outweigh the short-term effects. Watershed conditions will be enhanced by reconstructing and then decommissioning these roads properly.

The important elements of the selected alternative are:

- Commercially thin approximately 1,718 acres.
- Watershed benefit associated with reconstruction of existing, closed roads and their more effective closure; and reconstruction of unclassified, abandoned roads and their decommissioning.
- The greatest estimated present net value of the alternatives considered which may be available for KV which could fund enhancement work.
- Estimated harvest volume of approximately 25.7 million board feet of timber.

This alternative meets requirements under the National Forest Management Act, National Environmental Policy Act, Clean Air Act, Clean Water Act, and all other applicable environmental laws, regulations, and policies.

Repairs to FSR 3000000 (30 Road)

As described in the EA, repair and culvert replacement project needs were identified and are planned on the 30 road. Other portions of the road were damaged in the January 2009 flood event. Some of the damage is minor and will be repaired as part of regular road maintenance. However, there are two sites which sustained a higher degree of damage and will be repaired under the Emergency Relief for Federally Owned Roads (ERFO) program. The NEPA analysis

for these ERFO repairs is on-going. A review of the anticipated affects of these repair projects indicated that no effects, particularly in terms of cumulative effects, beyond those disclosed in the EA are expected.

Mitigation Measures and Design Features

Mitigation measures and design features were developed for Alternative B (modified) to ensure compliance with direction in the *Olympic Land and Resource Management Plan*, as amended, and Forest program direction. Specific measures/features were identified for the following areas; botany, fisheries, noxious weeds, riparian reserves, roads, soil and water, vegetation/habitat, and wildlife. They are listed on pages 30 to 37 of the EA.

Monitoring and Adaptive Management

Specific monitoring activities associated with Alternative B (modified) are listed on pages 38-39 of the EA. Included is the Rainy Creek Biodiversity cooperative study project, being conducted with Peninsula College.

Other Alternatives Considered

The Environmental Assessment considered three alternatives in detail; two that would reduce forest stand density and increase forest stand complexity (Alternatives B and C) and one that would not (Alternative A, No Action).

Alternative A would not have treated any identified stands. I did not select this alternative because if thinning were not to occur, tree-to-tree competition would result in crown recession (low crown ratios), and loss of growth and vigor in stands in the Middle Sol Duc, Deep Creek, and West Twin River watersheds. Trees would become more susceptible to insects and root diseases. Without treatment, the stands would slowly pass through successional phases via natural processes. Over time, opportunities for thinning will be reduced or eliminated, and opportunities to create or hasten development of desired stand conditions could be lost. In addition, opportunities to improve watershed conditions, either through a timber sale or service contract, or future Knudsen-Vandenburg (KV) funded projects, would be deferred or lost.

Alternative C differs primarily from Alternative B as originally proposed and as modified in that it eliminates about 53 acres of treatment (Unit 43 and portions of Units 36 and 44) to reduce potential disturbance within a northern spotted owl activity center. Even though this activity center is now technically vacant, this alternative could provide benefits to wildlife. Thinning of these acres will follow direction provided in many reference documents, including the Soleduck Late Successional Reserve Assessment, which advocate increasing available habitat in vacant spotted owl activity centers. Alternative C also differs slightly from Alternative B in that 75 acres would be harvested by helicopter instead of ground-based systems to reduce potential sedimentation and impacts to soils. While the analysis did indicate estimated sedimentation associated with Alternative C would be slightly lower than Alternative B in the short-term, monitoring of other thinning projects has found very little sediment is found downstream of activity areas when mitigation measures are followed. Overall the long-term watershed benefits of Alternative B (modified) outweigh the limited short-term gains of Alternative C. Additionally, Alternative C provides fewer funds than Alternative B that could be available for KV funding of enhancement work. For these reasons I did not select Alternative C.

Alternative Considered but Dismissed From Further Study

Two alternatives were considered by the interdisciplinary team, but as discussed below, were dismissed from detailed analysis in the environmental assessment.

One alternative included building a bridge across Bear Creek to access approximately 233 acres to the south of Bear Creek. Approximately 2 miles of decommissioned and abandoned roads would be used to harvest those units. The cost of installing a temporary bridge across Bear Creek, however, was comparable to helicopter logging. Additionally, because installing and removing the temporary bridge would cause sediment erosion and transport affecting downstream aquatic habitat, this alternative was eliminated from further consideration.

Additionally, twenty-one forest stands (approximately 617 acres) in the project area initially considered for thinning were eliminated from further consideration. Reasons for their elimination are based on stand conditions that would not be improved through commercial thinning. Specific reasons include stands being older or already diverse; stands that are too young or brushy to make a viable commercial thin; extent of potentially unstable riparian areas that would require no cut buffers; and stands requiring too much road construction for the size of the area to be accessed.

Public Involvement

To help identify issues for this project, the Pacific Ranger District sent scoping letters on April 13, 2004 and April 5, 2005 to concerned publics, state, federal, and local government agencies describing the proposed action and requesting comments. The Lower Elwha S'Klallam, Makah, and Quileute tribes were also contacted prior to each scoping letter. The project was also listed in the Forest's *Schedule of Proposed Actions* which describes the proposed action and is posted on the Olympic National Forest internet website. Ten responses were received.

An earlier version of this EA, dated May 2006, was made available for public comment on May 5, 2006. Eight comments were received and have been considered in the preparation of this EA. Based on the analysis documented in the May 2006 EA Forest Supervisor Dale Hom made a decision on September 15, 2006 to implement the Bear Creek Saddle project. This decision was the subject of a lawsuit and due to a ruling against the Forest Service on a narrow issue of a NEPA procedural deficiency Forest Supervisor Hom withdrew his decision on June 20, 2008 with a letter to parties interested in the Bear Creek Saddle project. The June 20, 2008 letter expressed Forest Supervisor Hom's intent of issuing a new NEPA analysis to cure the procedural deficiency. This new analysis is documented in this EA.

Additional public involvement occurred with a meeting of interested stakeholders on October 30, 2008 at the Forest Headquarters in Olympia, Washington. This meeting was held to provide an opportunity for those interested in the project to express their thoughts and concerns. Five interested stakeholders attended the meeting.

Two key issues were identified through Interdisciplinary Team deliberations and review of public comments. The interdisciplinary team (IDT) focused its analysis on these key issues. The alternatives, including the Proposed Action, were developed to highlight trade-offs between the environmental benefits of thinning, and the monetary and non-monetary costs and risks associated with accessing and removing the timber.

The two key issues are:

1. Potential for Accelerated Erosion, Sediment Delivery, and Loss of Soil Productivity, and Effects on Fisheries
2. Potential impacts of implementing thinning activities within an existing owl activity center (considered technically “vacant” as there have been no documented sightings since 2001).

I carefully considered how Alternative B (modified) addressed these two issues.

The EA was circulated for 30-day comment and four comments were received. Comments were considered and addressed as detailed in Appendix E of the EA

I have reviewed and considered all comments received in response to the EA, and have used these comments to enhance the project analysis via the Response to Comments.

Finding of No Significant Impact

After considering the environmental effects described in the EA, I have determined that implementation of Alternative B (modified) does not constitute a major Federal action significantly affecting the quality of the human environment. Thus, an environmental impact statement will not be prepared. I base my finding on the following:

Context of Action: The context of the Bear Creek Saddle activities will be local and short-term in nature. Commercial thinning will occur on 1,718 acres of National Forest System Lands, less than 1% of the 22,000 acres that make up the Bear Creek, Deep Creek, and West Twin River watersheds, and would likely occur over the next three years.

Intensity of Effects: The environmental effects of the following actions are documented in Chapter 3 of the Bear Creek Saddle Environmental Assessment: commercial thinning of trees, opening closed system roads and closing or decommissioning them after project completion, and constructing or reconstructing and then obliterating and rehabilitating temporary and unclassified, abandoned roads. The beneficial and adverse direct, indirect, and cumulative impacts discussed in the EA have been disclosed within the appropriate context, and effects are expected to be low in intensity because of project design, standard operating procedures, and mitigation. Significant effects to the human environment are not expected. The rationale for this determination on non-significance is based on the environmental assessment, in light of the following factors:

1. Beneficial and adverse effects were considered during analysis of the proposed action and its alternatives. Beneficial effects of the activities proposed under Alternative B (modified) include improved condition of some closed system roads and improved habitat conditions for late-successional species. Several adverse effects were identified including potential to increase erosion and sediment delivery during project implementation, and increased compaction. Alternative B (modified) has been designed to minimize these and other potentially adverse environmental impacts (EA p. 30-37). Neither the beneficial nor adverse effects as discussed in the EA are deemed to be of sufficient intensity to be identified as significant.

2. There will be no significant effects on public health and safety (EA p. 139). Mitigation measures and design features will protect the worker safety during project implementation (EA p. 36). Effects on water quality (sediment) are expected to be very limited (EA p. 135) due to mitigation measures and design features (EA at 30-37). There will be no effect on air quality (EA p. 135).
3. There will be no significant effects to unique characteristics of the area. The project is not in close proximity to any historic or cultural resources, park lands, prime farmlands, wild and scenic rivers, or ecologically critical areas (EA p. 134-135). Small wetlands within the project area would be protected (EA p. 22). There are no inventoried roadless areas or wilderness within the analysis area (EA p. 135).
4. The effects on the quality of the human environment are not likely to be highly controversial. The Olympic National Forest Land and Resource Management Plan permits commercial thinning and road work in the project area, and these activities have historically been conducted in this area. This project affects second growth trees within previously harvested stands.
5. My decision will not impose any highly uncertain, unique, or unknown environmental risks. We have considerable experience with the types of activities to be implemented. Commercial thinning and associated road work have been implemented successfully on the Olympic National Forest in the past, meeting regulations concerning these activities and the protection of National Forest resources. The effects analysis shows the effects are not uncertain, and do not involve unique or unknown risk (see EA Chapter 3).
6. The action is not likely to establish a precedent for future actions with significant effects and does not represent a decision in principle about a future consideration. Commercial thinning and road work are not new activities on the Forest, and follow common silvicultural practices with known results. The mitigation measures (EA p. 30-37) are known to reduce risks to the watershed. The EA effectively addressed and analyzed all major issues associated with the project.
7. Implementation of Alternative B (modified) does not represent potential cumulative adverse impacts when considered in combination with other past, present, and reasonably foreseeable actions. The EA effects discussion (EA Chapter 3) indicates no likelihood of cumulatively significant impact to the environment.
8. The action will have no significant adverse effect on districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places. No sites were found in project surveys. SHPO concurred with the No Effect finding (EA p. 142).
9. The action is covered by a Programmatic Biological Opinion (as amended October 2004), as documented in a Project Consistency Evaluation Form dated February 18, 2009. The finding for the project is "May Affect, Likely to Adversely Affect" to the northern spotted owl and marbled murrelet as a result of early breeding season noise disturbance. The Programmatic Biological Opinion allows for some early season disturbance, and the project follows prudent measures and project design criteria in the Biological Opinion.

Overall, the project would contribute to restoring habitat for late-successional species. The finding for the project is “Not Likely to Adversely Affect” to Designated Critical Habitat for spotted owl and marbled murrelet. The finding for Puget Sound Chinook Salmon, Puget Sound Steelhead Trout, bull trout, and Hood Canal Summer Chum Salmon is “No Effect.” Several sources of new information were reviewed to determine if any additional new information on the northern spotted owl and marbled murrelet biological or ecological requirements should be incorporated into the environmental analysis for this project. These reviews were of the US Fish and Wildlife Service’s Five-year Status Review of the Marbled Murrelet (August 2004) and Northern Spotted Owl (November 2004), northern spotted owl Status Review (USFWS November 2004) and Demography Report (Anthony et al. 2004), and the marbled murrelet Evaluation Report (McShane et al. 2004). It was concluded that the new information does not change the analysis of the Bear Creek Saddle project, as the project would not contribute to marbled murrelet habitat loss and fragmentation threats, nor would it contribute to northern spotted owl species threats and population declines.

10. The action does not threaten a violation of Federal, State, and local laws or requirements for the protection of the environment. Analysis has determined that Alternative B (modified) is consistent with the Olympic National Forest Land and Resource Management Plan, as amended, and is in compliance with the Clean Water Act and Clean Air Act (EA pg. 135).

Findings Required by Other Laws and Regulations

This decision to approve the Bear Creek Saddle Project is consistent with the intent of the Olympic National Forest Plan’s long term goals and objectives. The project was designed in conformance with land and resource management plan standards and incorporates appropriate land and resource management plan guidelines via the design features and mitigation measures listed in Chapter 2.

In particular, I have reviewed the EA and supporting documents for consistency with the Northwest Forest Plan Aquatic Conservation Strategy objectives in accordance with the 1994 ROD, Attachment B, p. B-10. The applicable watershed analyses and the EA include descriptions of the existing condition, range of natural variability of important physical and biological components of the watersheds, and how the proposed project maintains the existing condition or moves it within the range of natural variability (EA p. 125-133). Based on my review of those materials, I have determined that this project does not prevent attainment of the Aquatic Conservation Strategy objectives.

Implementation Date

If no appeals are filed within the 45-day time period, implementation of the decision may occur on, but not before, 5 business days from the close of the appeal filing period. When appeals are filed, implementation may occur on, but not before, the 15th business day following the date of the last appeal disposition.

Administrative Review or Appeal Opportunities

This decision is subject to appeal pursuant to Forest Service regulations at 36 CFR 215. Any individual or organization who submitted comments during the comment period specified at 36 CFR 215.6 may appeal. Written notice of appeal must be postmarked or received by the Appeal Deciding Officer, Regional Forester Mary Wagner, ATTN: Appeals, USDA Forest Service, PO Box 3623, Portland, OR 97208-3623 within 45 days of the date of publication of notice regarding this decision in *The Olympian* (Olympia, WA). The appeal must state that the document is an appeal pursuant to 36 CFR 215, and at a minimum must meet the content requirements of 36 CFR 215.14, and include the name and address of the appellant, and must identify the decision by title, subject, date of decision, and name of the Responsible Official. The appeal narrative must be sufficient to identify the specific change(s) to the decision sought by the appellant or portions of the decision to which the appellant objects, and must state how the Responsible Official's decision fails to consider comments previously provided. If applicable, the appeal should state how the appellant believes this decision violates law, regulation, or policy.

Appeals (including attachments) may be filed by regular mail, fax, e-mail, hand delivery, express delivery, or messenger service. The publication date of the notice regarding this decision in the newspaper of record is the sole means of calculating the appeal filing deadline, and those wishing to appeal should not rely on dates or timelines from any other source. E-mail appeals must be submitted to: appeals-pacificnorthwest-regional-office@fs.fed.us, and must be in one of the following three formats: Microsoft Word, rich text format (rtf) or Adobe Portable Document Format (pdf). FAX appeals must be submitted to: 503-808-2255. Appeals may be hand-delivered to the Resource Planning and Monitoring Office, 333 SW First Ave., Portland, between 8:00 AM and 4:30 PM Monday-Friday.

Contact

For additional information concerning this decision or the Forest Service appeal process, contact Tim Davis, Forest Planner, Olympic National Forest; at 1835 Black Lake Blvd. SW, Olympia, WA, 98512, phone: 360-956-2375.



DALE HOM
Forest Supervisor
Olympic National Forest

Feb 20, 2009

Date

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Appendix A – Alternative B modifications

Unit/Road	Change from EA Alternative B
8	24 acre reduction; no ground based yarding
10	1 acre reduction
16	26 acre reduction; added helicopter yarding
17	24 acre reduction; no cable yarding, added helicopter yarding
18	5 acre reduction
19	No ground based yarding
20	11 acre reduction
22	29 acre reduction
23	64 acre reduction
24	17 acre increase; no cable yarding, added helicopter yarding
26	10 acre increase
27	No ground based yarding
29	3 acre reduction
30	12 acre reduction
31	20 acre reduction
32	8 acre reduction; no helicopter yarding
33	No cable yarding
34	No cable yarding
35	41 acre reduction; no ground based yarding
38	31 acre reduction
39	20 acre reduction
40	23 acre reduction
41	31 acre reduction; added ground based yarding
55	No cable yarding
57	No ground based yarding
58	No ground based or cable yarding, added helicopter yarding
59	No ground based or cable yarding, added helicopter yarding
60	6 acre increase
61	28 acre reduction
62	48 acre reduction
63	21 acre reduction
64	22 acre reduction; added helicopter yarding
65	12 acre reduction
3000-012	Not using entire unclassified road (0.4 mile)
3000-382	Not using entire unclassified road (0.8 mile)
3000-386	Not using entire temporary road (0.1 mile)
3100-010	Not using western 0.4 mile of closed system road as planned in EA