

# Stone Creek Vegetation Management Project (#65780) Scoping Comments

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January 01, 2025

Please consider these comments for Stone Creek Vegetation Management Project scoping:

## 1. Proposed Activities and Conflicts with B2 – “Scenic Viewshed” LUA

The proposed Stone Creek Vegetation Management Project has footprint immediately south of the Timothy Lake vicinity. This area immediately south of the lake contains a significant concentration of B2 – Scenic Viewshed Land Use Allocations (LUA). The activities proposed within these areas include non-commercial timber stand improvement, commercial thinning, roadside hazardous fuels treatment, and broadcast burning.

The B2 LUA describes visual quality objectives within distance zones from selected viewer positions. As it pertains to this project, the selected viewer positions have been identified as Timothy Lake, FS Road 57, and the Pacific Crest National Trail (Table Four-23, Mount Hood National Forest Land and Resource Management Plan, 1990). The foreground area is defined as no more than 0.5 miles from selected “...travelways, water bodies, or public use areas...” (Page Four – 219, Mount Hood National Forest Land and Resource Management Plan, 1990).

The major characteristics found within that defined foreground area have been defined in the Plan as follows:

- Vegetation is composed primarily of multi age multi species stands with a diverse understory of natural plant associations
- Numerous large diameter old trees are a major component of the stands
- Small natural appearing openings provide diversity and a sense of depth
- The ground is generally free of unnatural forms and patterns of debris and litter
- Seasonal changes in vegetation color and texture are noticeable
- The target tree diameters for mature trees with following vegetation types are:
  - grand fir (ponderosa pine), 24 inches dbh (diameter at breast height)
  - Pacific silver fir, 26 inches dbh (diameter at breast height)
  - western hemlock, 32 inches dbh (diameter at breast height)
  - Mountain hemlock, 24 inches dbh (diameter at breast height)

Given the nature of the proposed activities, how are these compatible with the characteristics of the LUA that they overlap? There is a sizable overlap between the proposed unit boundaries and the applicable areas. For visual reference, I have developed the attached visualization which shows the scoping unit boundaries and the 0.5 mile area within the B2 LUAs from affected features as specified in Table Four-23. These areas should be removed from the project.

## 2. Noise Impacts to Northern Spotted Owls

In addition to Commercial Thinning, the scoping letter mentions that the proposed roadside hazardous fuels treatment work will include the use of mechanized equipment. The scoping letter does not explicitly call out the age range of stands within the project area but does acknowledge that mature & old-growth plant communities exist within the project area. What steps will the Forest Service take to address potential noise impacts from their proposed activities? For context, the Washington Department of Transportation<sup>1</sup> has determined that noise impacts from machinery like chainsaws may lead to a “May Affect” or “Likely to Adversely Affect” at two distance thresholds:

- 195 Feet: This was the distance that WSDOT suggested was a disruption distance in early nesting season (Mar 15 – July 15) that might lead to an effects determination of Likely to Adversely Affect.
- 195 Feet – 0.25 Miles: This was the distance that WSDOT suggested was a disruption distance from March 1<sup>st</sup> through September 30<sup>th</sup> that may lead to a Not Likely to Adversely Affect / “May Affect” determination.

The attached figure highlights the roadside fuel treatment units along with their two distance thresholds for noise impacts. Will the Forest Service do any Survey & Manage surveys to identify any Northern Spotted Owl sites that may be impacted? My specific areas of concern would be:

Road Number	Beginning Milepost	Ending Milepost	Proposed Activity
42	8.47	8.61	Roadside Hazardous Fuels Treatment
42	10.00	10.12	Roadside Hazardous Fuels Treatment
42	10.9	11.3	Roadside Hazardous Fuels Treatment
4270	1.04	1.3	Roadside Hazardous Fuels Treatment
5730-230	0.78	0.9	Commercial Thinning (80-100 BA)
5740	2.65	2.7	Roadside Hazardous Fuels Treatment
5740-230	2.63	2.63	Roadside Hazardous Fuels Treatment

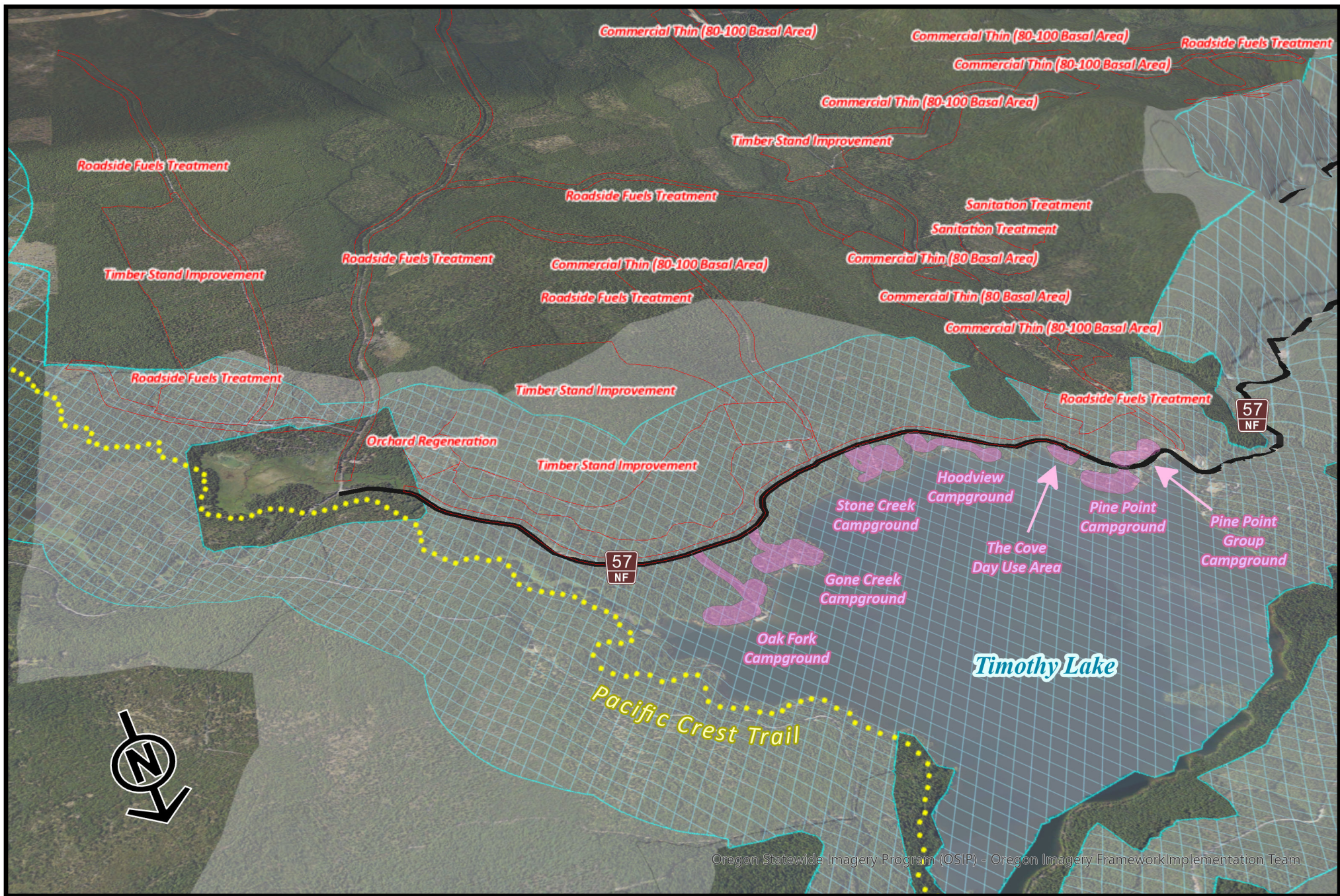
Thank you,

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### References Cited in these Comments:

1. Harke, Vince. *Appendix I1. Washington State Department of Transportation (WSDOT) 2014 Programmatic Biological Opinion – Supplemental Analysis. Effects Analysis for Spotted Owl in the Western Washington Lowlands Province*. U.S. Fish & Wildlife Service (2014). <https://wsdot.wa.gov/sites/default/files/2021-10/Env-FW-AppendixI-SiteEvaluationRequirementAndEffectDeterminationsCriteria-NorthernSpottedOwl.pdf>





## Stone Creek Vegetation Management Project Proposed Treatments and Affected B2 - "Scenic Viewshed" Areas

### Key to Features:

<span style="border: 2px solid red; display: inline-block; width: 20px; height: 10px;"></span> Scoping Units	<span style="border: 2px solid cyan; display: inline-block; width: 20px; height: 10px;"></span> 0.5 Mile Foreground	<span style="color: yellow;">.....</span> Pacific Crest Trail
<span style="border: 1px solid black; display: inline-block; width: 20px; height: 10px;"></span> B2 LUA - "Scenic Viewsheds"	<span style="border-bottom: 2px solid black; display: inline-block; width: 20px;"></span> FS Road 57	<span style="background-color: pink; display: inline-block; width: 20px; height: 10px;"></span> Campgrounds / Day Use Areas

Map Produced by Steve Cole (scale@scolephoto.com)



## Stone Creek Vegetation Management Project Roadside Hazardous Fuels Treatment Units and Mature / Old-Growth Stand Proximity