

“WELL-DISTRIBUTED” PROPOSAL

We propose to couple a narrative standard with alternative numeric metrics.

Narrative Standard

- When actively managing the riparian area, the operator shall leave trees well-distributed, minimizing large gaps, favoring small openings in canopy cover, and leaving residual trees in a manner which promotes understory as well as diameter and crown growth while considering safety, operational limitations, and efficient harvest of adjacent stands.

Plus, a landowner must choose to implement one of the following alternative numeric metrics:

- **Alternative A**
 - The Board motion required a minimum of 15 and 30 trees per 1000' on small and medium SSBT streams, respectively. Those trees must be left in the area between the 20' no-cut, and the 60' and 80' outer edges for smalls and mediums, respectively. That is, the trees must be left in the outer 40' for smalls and the outer 60' for mediums.
 - We propose that Alternative A designate an “outer zone” of 20', and that you require a minimum number of trees *in this outer zone*. If divided evenly, this means that, for smalls, 20/40 of the 15 trees would need to be left in the outer zone, or 7.5 trees, which we propose be rounded to 8 trees. Likewise, for medium streams, an outer zone of 20' divided evenly would require 20/60 of 30 trees, or a total of 10 trees.
 - Provided you meet the minimum basal area, total tree count, and outer zone tree count, additional harvest would be not be restricted.
- **Alternative B**
 - Prohibit creating any canopy gap larger than 0.1 acres within the RMA, measured by the area between remaining trees (boles). Provided the landowner meets the minimum tree count and basal area requirements, and does not create canopy gaps larger than 0.1 acres, then additional harvest would not be restricted.
 - Any existing gap larger than 0.1 acres may not be made larger.

Commentary

- While we considered significantly more sophisticated proposals, no single metric will capture all circumstances on the ground. We believe that the Board's instruction is best accomplished by coupling the simple numeric metrics above with a robust narrative standard.
- It is important to note that the Board already included enforceable metrics in its rule. Those include a minimum tree count, a minimum basal area requirement, and a no-cut zone. The additional metrics suggested above will distribute the retained trees throughout the RMA in a manner not required under current rules.
- While one could imagine straight line entries into the RMA, the retained trees will necessarily be distributed unevenly along the RMA edge by virtue of their natural distribution and canopy shape.
- Under alternative B, the 0.1 acre “canopy gap” would be defined by measurements from the boles of remaining trees. Much of any such gap would be covered by the canopy of the remaining trees. That canopy will continue to grow over time.