

## Attachment 1

Excerpt from the November 20, 2001 document:

SECOND SET OF QUESTIONS ON USE OF  
THE RECORD OF DECISION AND STANDARDS AND GUIDELINES  
For Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures  
Standards and Guidelines (January 2001)

### PRE-DISTURBANCE SURVEYS - ROUTINE MAINTENANCE

56. Q. The ROD states that "routine maintenance" is exempted from pre-disturbance surveys. What is meant by the term routine?

A. In general, routine maintenance should be maintenance that occurs on some periodic schedule covering facilities and developments. Routine maintenance includes activities on developments that were intended to be maintained, designed to be maintained, or need to be maintained by law or normal fiscal concerns (protecting investments so they can continue to serve as designed). Examples include: earthen filled dams cleared of encroaching alder every 10 years; culverts cleaned when they clog; hazard trees or blowdown removed from campgrounds after infrequent windstorms; hazard trees along road right-of-ways; and powerline right-of-ways treated consistent with current permits. In general, these occur in areas where habitat has been previously disturbed.

57. Q. What about hazard trees in campgrounds... is this routine maintenance?

A: Routine maintenance, including falling hazard trees in campgrounds, is not considered a habitat-disturbing activity (S&G's page 22), and thus does not trigger pre-disturbance surveys. Use standard methods to evaluate hazards. Treatment of hazard trees in campgrounds has two separate aspects: felling and removal. With public safety being a chief concern, address the safety issue and then determine what to do with the log on the ground. Treatment of the fallen tree should be done consistent with the operations and maintenance management plan for the campground.

58. Q. Does the felling and removal of hazard trees through a timber sale contract require pre-disturbance surveys for survey and manage species?

A. If felling and removal of hazard trees is considered to be routine maintenance of the improvement or existing structure, then surveys are not required. A timber sale contract may be one way of dealing with this situation.

59. Q: How about culvert work, is this routine maintenance?

A. Keeping a road development safe, clean, and stable at frequent re-occurring intervals is usually considered routine maintenance. Additionally, culvert work is typically within a disturbed road prism area, which receives various routine maintenance activities.