



**DEPARTMENT OF  
NATURAL RESOURCES**

**FOREST PRACTICES DIVISION**

1111 WASHINGTON ST SE  
MAIL STOP 47012  
OLYMPIA, WA 98504-7012

**360-902-1400**

FAX 360-902-1428  
FPD@DNR.WA.GOV  
WWW.DNR.WA.GOV

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To: Forest Practices Board

From: Mary McDonald (Forest Practices Assistant Division Manager, Policy and Services, DNR), Shane Early (Forest Practices Coordinator, Southeast Region, DNR), Gary Bell (Forest Habitats Wildlife Biologist, WDFW), Joe Buchanan (Natural Resource Scientist, WDFW)

**SUBJECT:** Assessment for North Blewett Spotted Owl Special Emphasis Area

### **Introduction and Background**

In response to commitments made at the [August 12, 2020 meeting of the Forest Practices Board](#)<sup>1</sup>, this memo summarizes results of an evaluation whether goals within the North Blewett Spotted Owl Special Emphasis Area (SOSEA) are being achieved. As discussed at the August 12, 2020 meeting, success toward achieving the SOSEA goals was evaluated based on how well applicable forest practices rules have been implemented for forest practices applications (FPAs) associated with the SOSEA. No landowners within the North Blewett SOSEA have availed themselves of either the Landowner Option Plan (LOP) or Cooperative Habitat Enhancement Agreements (CHEA) under [WAC 222-16-100](#), so these provisions do not apply. Thus, this review focuses on DNR's application of the habitat rules ([WAC 222-16-085](#)) and the Board's SEPA policies for Class IV-Special applications involving Northern Spotted Owls (NSO; [WAC 222-10-041](#)), including target habitat levels (WAC 222-10-041(4)).

This memo also provides information for Board members about modeling related to NSO habitat and population that will be used to inform a potential conservation incentives program. Background on the North Blewett SOSEA, the assessment approach, and summaries of applicable forest practices rules were provided to the Board at its [May 13, 2020 meeting](#) (see meeting minutes beginning on page 4) and at the August 12, 2020 meeting. That material is not repeated in this memo and readers are encouraged to review the background materials.

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<sup>1</sup> See discussion beginning on page 11 of the minutes from the August 12, 2020 Forest Practices Board meeting.

## **Part 1: Assessment for the North Blewett Spotted Owl Special Emphasis Area**

The Department of Natural Resources (DNR) is responsible for reviewing, classifying, approving, or disapproving FPAs submitted by landowners on non-federal and non-tribal forestlands in Washington State. Forest practices rules and DNR procedure require a strict methodology in this process, with both office and field reviews to ensure protection of public resources, per RCW and WAC. “Public resources” include wildlife ([RCW 76.09.020\[25\]](#)). FPAs are reviewed in office utilizing a variety of Geographic Information System (GIS) data layers to screen for potential slope stability concerns, proximity to streams or wetlands, presence of known threatened, endangered, or sensitive species, proximity to Department of Health spring water systems and wells, and presence of known archaeological or historical sites or districts. The following description of FPA assessment focuses on the NSO.

### Initial Assessment

When a FPA is submitted that involves lands within a SOSEA, DNR takes several steps to process the application. Key steps include verification of 1) whether or not the proposed activity is within a NSO site-center circle (which approximates an owl home range), 2) whether or not the activity, if within a circle, involves NSO habitat as defined in [WAC 222-16-085](#), and 3) if the landowner qualifies for the small forest landowner exemption as defined in [WAC 222-16-080](#).

### Habitat Verification

Habitat in NSO circles located within Washington’s 10 SOSEAs was initially mapped using information derived from aerial imagery, remote sensing data, and in some areas, ground-based assessments for the purposes of implementing the forest practices rules. However, without more comprehensive ground-based assessments, it is not always possible to accurately detect key habitat criteria defined in the rules (e.g., canopy layers, downed wood, snags). This small but relevant amount of uncertainty in habitat identification has two consequences. First, prioritization is placed on assessing habitat in circles when FPAs are submitted that propose harvest of habitat. Many circles in SOSEAs are already below the SEPA threshold for habitat retention so there are relatively few FPAs in those circles that propose removal of habitat. Second, some patches of forest that are challenging to visually classify without vegetation data may have initially been classified as habitat when in fact they are not habitat. This conservative safety measure was often applied to ensure more thorough review of potential habitat areas.

The uncertainty described above sometimes results in an incorrect habitat designation for a patch of forest (e.g., non-habitat is classified as habitat). If a landowner thinks a habitat designation is inaccurate, DNR may ask the landowner to provide forest vegetation data to assist with accurate habitat classification. Currently, a landowner will typically submit information that describes how data

were collected, a map showing where data were collected, and specific forest stand vegetation plot information. If a forest practice has been proposed in an area that is clearly non-habitat, no habitat data are requested. The vegetation plot information relates specifically to the elements of NSO habitat in the rules: for example, tree species, average tree height, average tree diameter, amount of down woody material, number of snags or cavity trees, amount of shrub cover, and prevalence of mistletoe.

When vegetation data are provided by a landowner, the information is used in conjunction with a site visit to the area of interest to help inform correct habitat classification. Field review is essential for evaluating potential heterogeneity in a forest patch that is not evident from aerial imagery and vegetation data alone. These field verification efforts often involve an Interdisciplinary Team (ID Team) convened by DNR prior to or during the FPA review period, and prior to an approval/disapproval decision on the application. The ID Team typically includes individuals from multiple state agencies, Native American tribes with local or regional interests in forest management, and the landowner or their representative. The Forest Practices Forester (FPF) is responsible for convening the ID Team and making the final decision to approve or disapprove the proposed activity based on evaluation and input from the ID Team. The important points of field review, on-site discussion, and recommendations made by the ID Team are documented by the FPF in an Informal Conference Note (ICN) and any supporting correspondence from subject matter experts involved in the ID Team process.

### Pre-Application and Application Reviews

Landowners proposing forest practices within owl habitat in SOSEAs have been encouraged to request “pre-application reviews” by DNR.<sup>2</sup> This approach allows the proponent, DNR, and appropriate stakeholders to review a forest practice proposal without the time constraints that occur once the FPA has been submitted. Further, it provides an opportunity to identify and address possible issues of concern in a proposal in advance of FPA submittal. The FPA review and standards for documentation remain the same whether or not the FPA involved had undergone pre-application review.

### **How Well Did FPA Processing Within the SOSEA Adhere to Applicable Forest Practices Rules?**

The analysis timeframe used for this assessment was limited to the last ten years because the records retention schedule requires that DNR retain FPA files for ten years from the expiration date, after which the records are typically discarded.

The North Blewett SOSEA encompasses all or part of median home range circles associated with 20 NSO site centers. Ten of those site centers are located within the SOSEA boundary. Another ten site

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<sup>2</sup> DNR encourages landowners to request pre-application reviews in many other instances involving complex forest practices proposals, such as those proposed in or around potentially unstable landforms.

centers are located outside the SOSEA boundary on federal lands but portions of their circles fall within the boundary and are subject to the forest practices rules [\(WAC 222-16-080\(1\)\(i\)\)](#).

File review from the last ten years identified 48 FPAs associated with the North Blewett SOSEA. We evaluated the documentation used to classify each FPA within the SOSEA related to NSO sites and habitat. The following is a summary of the information relevant to those FPAs:

- All 48 FPAs were originally processed as Class III applications and there were no criteria that obligated review of the proposal under SEPA.
- Of the 48 FPAs, 6 were submitted by small forest landowners (SFLOs) who owned less than 500 acres within the SOSEA and who proposed activities that were located outside the 0.7 mile core circle, which qualified the proposal for exemption from SEPA if the proposal had arisen within NSO habitat.
- Of the remaining 42 FPAs, 17 were not within a circle, leaving 25 FPAs located within a circle that were also within the SOSEA. These 25 FPAs were the focus of the assessment.
- Of these 25 FPAs, 20 had a voluntary pre-application review, and 2 FPAs had some areas of NSO habitat confirmed during site visits; those 2 proposals were revised prior to FPA submission to exclude areas of NSO habitat.
- All 25 FPAs were field reviewed, either during the pre-application review or during the standard 30-day review period prior to the FPA approval/disapproval decision.

Each of the 25 focal FPAs had documentation confirming submittal of vegetation data (if needed), a field visit with an ID team (pre-application or during the 30-day review period), and a confirmation of appropriate habitat typing designation from Washington Department of Fish and Wildlife (WDFW) staff. As mentioned above, two applications involved areas of forest that were confirmed as NSO habitat within the proposed project footprint. In both cases, the proponent adjusted the proposal to remove the areas of habitat from the harvest plan before submitting the FPA.

The remaining 23 FPAs were in locations originally mapped as habitat to ensure these areas would be scrutinized if identified in an application for harvest. The landowner submitted vegetation data, followed by a site visit with an ID team, and a subsequent recommendation from WDFW verifying the correct classification of each area of interest as non-habitat.

Four of the 25 FPAs were renewed as Class II, but all four had been originally reviewed and approved as Class III FPAs (see attachment). Renewal of a FPA is done when the landowner requests an additional three-year extension to complete a previously approved FPA. Three additional renewals were part of 17 FPAs that did not involve work within a circle<sup>3</sup>.

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<sup>3</sup> FPAs generally were 2-year permits with unlimited renewals (as long as the rules did not change), in 2013, FPAs became 3-year permits and may have one renewal (WAC 222-20-080).

## FPA's or Pre-Application Proposals Confirmed to be Within NSO Habitat

If an FPA's project area located within a NSO circle (within the SOSEA) included NSO habitat, the FPA would be a Class IV-Special rather than a Class III and would be reviewed under SEPA. The application would be considered incomplete and disapproved (if not voluntarily withdrawn by the landowner) if it was submitted without a SEPA checklist (and additional materials specified by SEPA guidance), which is necessary for applications requiring SEPA review ([WAC 222-20-010\[8\]\[b\]](#)). This situation did not occur for the FPA's analyzed, but it is important to know how this would be processed by DNR.

For those Class III FPA's that occurred in non-habitat but within the core area of a circle, a timing restriction for activities within 0.25 miles of the site center during the breeding season ([WAC 222-30-050\(5\)](#)) was applied as a condition of the approval. Otherwise, if the project was in non-habitat and beyond that distance from the site center, the FPA was approved as a Class III.

## **Conclusions**

1. Based on a review of 48 FPA's submitted over the 10-year analysis period, we determined that forest practices rules were being appropriately implemented to meet default SOSEA goals.
2. Of the 25 FPA's that occurred within the North Blewett SOSEA and within one or more NSO sites, none were approved for harvest of habitat. Documentation supporting the FPA decision-making process was present for all 25 FPA's.
3. The field review process for forest practices proposals resulted in finding forest patches of both non-habitat and habitat, supporting the fact that meaningful habitat evaluations were conducted for forest practices proposals occurring within the SOSEA.

## **Part 2: Landowner Incentives and Modeling of Population Performance and Habitat**

Approximately ten years ago, the Northern Spotted Owl Implementation Team (NSOIT) was convened by the Forest Practices Board to engage in discussions and actions involving conservation of the NSO. The NSOIT devised a plan to incentivize conservation, exploring concepts such as conservation easements and mitigation banking. To optimize conservation the incentives program would use information from a modeling project to identify locations where conservation actions would provide the greatest benefit to NSOs. A regulatory framework would be needed to provide assurances to landowners engaged in such conservation actions; to address that need, a conceptual programmatic Safe Harbor Agreement for NSOs was drafted.

Habitat and population modeling work presented in two project reports (Dunk et al. 2014, LaPlante et al. 2017) indicated two key findings. First, high Barred Owl densities negatively influenced NSO population performance that ultimately led to pseudo-extinction, defined as the population density of NSOs at which persistence of the population was unlikely. This finding had previously been demonstrated in modeling conducted in support of the federal critical habitat effort (U.S. Fish and

Wildlife Service 2012) and in work conducted in British Columbia (Sutherland et al. 2007). When simulated Barred Owl populations were reduced and maintained at a density lower than current levels, NSO numbers persisted.

The second key finding of modeling was that when Barred Owl densities were lower, NSO abundance increased in conjunction with an increasing amount of habitat on the landscape. Simulated increases in habitat amount proved to be valuable as the modeling scaled up from the management circle to the landscape. Specifically, the size of the simulated NSO population could be increased by – according to the model structure – sequentially adding simulated habitat in owl circles below the SEPA threshold, in owl circles at or above the SEPA threshold, areas outside owl circles within SOSEAs and in areas outside SOSEAs (Dunk et al. 2014, LaPlante et al. 2017). Therefore, the importance of both NSO habitat and Barred Owl density reduction was clearly identified as key to conservation of the NSO.

The modeling results identified landscapes where conservation efforts would be most beneficial to persistence or increase of simulated NSO populations. The conservation value of each landscape differed, and the important conservation areas identified in different parts of the state likely contained some or all the spatial elements described in the paragraph above. In some landscapes, incentives may be most valuable in owl management circles, while in other landscapes the greatest value may be outside owl circles within SOSEAs, or altogether outside SOSEAs. It may be possible to make generalities about these different spatial considerations with additional modeling, and we remind readers that models can help us understand possible scenarios, but they typically cannot explain or predict specific outcomes.

None of the initiatives described in this section have been completed. The incentives program needs to be further developed and implemented. The draft programmatic Safe Harbor Agreement needs to be finalized, submitted to the US Fish and Wildlife Service, evaluated, and approved. DNR is currently seeking authority from the legislature to negotiate with the US Fish and Wildlife Service and subsequently implement a programmatic Safe Harbor Agreement. The modeling work to-date is illustrative, and the final, more refined assessment of options and benefits through modeling is anticipated to be completed in the next few months.

### **Literature Cited**

- Dunk, J.R., D.W. LaPlante, K.A. Whittaker, J.B. Buchanan, L. Burnes, K. Halupka, A. Hayes, G. King, T. Melchiors, and E. Ryback. 2014. Identifying and evaluating opportunities for conservation of Northern Spotted Owls on nonfederal lands in Washington, U.S.A. Report submitted to Washington Forest Practices Board, Olympia, Washington.
- LaPlante, D.W., J.R. Dunk, J.B. Buchanan, K.A. Whittaker, K. Halupka, T. Melchiors, A. Poopatanapong, and D. Donato. 2017. Identifying and evaluating opportunities for conservation of Northern Spotted Owls on nonfederal lands in Washington, U.S.A. Report submitted to Washington Forest Practices Board, Olympia, Washington.

Sutherland, G.D., D.T. O'Brien, S.A. Fall, F.L. Waterhouse, A.S. Harestad, and J.B. Buchanan. 2007. A framework to support landscape analyses of habitat supply and effects on populations of forest-dwelling species: a case study based on the Northern Spotted Owl. Technical Report 038, British Columbia Ministry of Forests and Range. Victoria, British Columbia.

U.S. Fish and Wildlife Service. 2011. Revised recovery plan for the Northern Spotted Owl (*Strix occidentalis caurina*). U.S. Fish and Wildlife Service, Portland, Oregon.

U.S. Fish and Wildlife Service. 2012. Endangered and threatened wildlife and plants; designation of revised critical habitat for the Northern Spotted Owl; final rule. Federal Register 77: 71876-72068.

Tally	FP_ID	RECEIVED	EXPIRED	CLASS	DECISION	In Site Circle	Site #(s)	Pre-app review	Landowner Type
1	2703329	2005-08-05	2016-08-18	II	RENEWAL	No	n/a	n/a	Large
2	2704049	2007-08-23	2016-09-20	II	RENEWAL	No	n/a	n/a	Large
3	2704272	2008-08-18	2012-09-15	II	RENEWAL	Yes	422, 677	Yes	Large
4	2704562	2010-03-19	2012-04-16	III	APPROVED	Yes	833	No	Small
5	2704710	2010-10-19	2012-11-15	III	APPROVED	Yes	422, 421, 833	No	Small
6	2704904	2011-09-06	2016-10-05	II	RENEWAL	No	n/a	Yes	Small
7	2705546	2014-05-12	2029-06-20	III	APPROVED	Yes	421, 833, 1235	Yes	Small
8	2705608	2014-05-16	2017-06-13	III	APPROVED	Yes	416, 1230	Yes	Large
9	2705610	2014-05-16	2017-06-18	III	APPROVED	No	n/a	n/a	Large
10	2705615	2014-05-27	2017-07-18	III	APPROVED	No	n/a	n/a	Large
11	2705677	2014-08-01	2017-08-29	III	APPROVED	No	n/a	n/a	Large
12	2705771	2014-10-27	2017-11-26	III	APPROVED	No	n/a	Yes	Large
13	2705778	2014-11-13	2017-11-26	III	APPROVED	Yes	1230	Yes	Large
14	2705848	2015-03-30	2018-04-28	III	COMPLETED	No	n/a	n/a	Small
15	2705877	2015-05-21	2018-06-16	III	COMPLETED	No	n/a	n/a	Large
16	2705901	2015-06-25	2018-07-24	III	COMPLETED	No	n/a	n/a	Large
17	2706041	2016-04-18	2019-05-17	III	COMPLETED	No	n/a	n/a	Large
18	2706075	2016-06-08	2019-07-06	III	COMPLETED	No	n/a	n/a	Large
19	2706097	2016-06-29	n/a	III	WITHDRAWN	Yes	416, 1230	No	Large
20	2706120	2016-08-08	2019-09-02	III	COMPLETED	No	n/a	n/a	Large
21	2706123	2016-08-11	2019-09-02	III	COMPLETED	Yes	318	Yes	Large
22	2706127	2016-08-18	2022-09-16	II	RENEWAL	Yes	1230	Yes	Large
23	2706166	2016-10-20	2022-11-18	II	RENEWAL	Yes	422, 678	No	Large
24	2706167	2016-10-20	2019-11-18	III	COMPLETED	Yes	420, 739	No	Large

**Legend Note**

7	Class III when originally received, renewed as Class II
6	SFLO within SOSEA but outside 0.7 circle or not within any NSO circle
19	In SOSEA, not within NSO site circle, regardless of being LFLO or SFLO

**Legend Note**

25	LFLO project, within SOSEA and NSO circle(s)
2	FPA revised prior to submission following pre-app review
25	Had pre-app review



Tally	FP_ID	RECEIVED	EXPIRED	CLASS	DECISION	In Site Circle	Site #(s)	Pre-app review	Landowner Type
25	2706182	2016-11-08	2022-12-07	II	RENEWAL	Yes	416	No	Large
26	2706195	2017-01-10	2020-01-24	III	APPROVED	Yes	422, 678	Yes	Large
27	2706255	2017-05-25	2020-06-20	III	APPROVED	No	n/a	n/a	Large
28	2706345	2017-08-21	2020-09-18	III	APPROVED	Yes	415	Yes	Large
29	2706367	2017-09-27	2020-10-26	III	APPROVED	No	n/a	n/a	Large
30	2706373	2017-10-03	2020-11-01	III	APPROVED	No	n/a	n/a	Large
31	2706384	2017-10-23	2020-11-21	III	APPROVED	No	n/a	n/a	Large
32	2706492	2018-05-30	2021-06-26	III	APPROVED	Yes	416, 1208	Yes	Large
33	2706532	2018-07-11	2021-08-07	III	APPROVED	Yes	416, 1208, 1230	No	Large
34	2706540	2018-07-18	2021-08-16	III	APPROVED	Yes	416, 678, 1208	Yes	Large
35	2706573	2018-09-04	2021-10-03	III	APPROVED	Yes	678, 1230	Yes	Large
36	2706581	2018-09-06	2021-10-03	III	APPROVED	Yes	678	Yes	Large
37	2706600	2018-10-08	2021-10-30	III	APPROVED	Yes	678	Yes	Large
38	2706619	2018-11-13	2021-12-03	III	APPROVED	Yes	678	Yes	Large
39	2706745	2019-07-25	2022-08-23	III	APPROVED	Yes	415, 677	Yes	Large
40	2706750	2019-07-31	n/a	III	WITHDRAWN	No	n/a	Yes	Large
41	2706756	2019-08-14	2022-09-12	III	APPROVED	Yes	675, 1208	Yes	Large
42	2706774	2019-09-18	2022-10-15	III	APPROVED	Yes	415, 678	Yes	Large
43	2706776	2019-09-25	2022-10-14	III	APPROVED	Yes	415	Yes	Large
44	2706783	2019-10-02	2022-10-31	III	APPROVED	Yes	415, 418	Yes	Large
45	2706806	2019-11-04	2022-12-03	III	APPROVED	Yes	422	Yes	Small
46	2706813	2019-11-12	n/a	III	WITHDRAWN	No	n/a	n/a	Large
47	2706815	2019-11-14	n/a	III	DISAPPROVED	Yes	415, 677	Yes	Large
48	2706888	2020-04-30	2023-05-29	III	APPROVED	Yes	415, 418	Yes	Large

**Legend Note**

7	Class III when originally received, renewed as Class II
6	SFLO within SOSEA but outside 0.7 circle or not within any NSO circle
19	In SOSEA, not within NSO site circle, regardless of being LFLO or SFLO

**Legend Note**

25	LFLO project, within SOSEA and NSO circle(s)
2	FPA revised prior to submission following pre-app review
25	Had pre-app review

Tally	FP_ID	RECEIVED	EXPIRED	CLASS	DECISION	In Site Circle	Site #(s)	Pre-app review
1	2703329	2005-08-05	2016-08-18	II	RENEWAL	No	n/a	n/a
2	2704049	2007-08-23	2016-09-20	II	RENEWAL	No	n/a	n/a
3	2704272	2008-08-18	2012-09-15	II	RENEWAL	Yes	422, 677	Yes
4	2705608	2014-05-16	2017-06-13	III	APPROVED	Yes	416, 1230	Yes
5	2705610	2014-05-16	2017-06-18	III	APPROVED	No	n/a	n/a
6	2705615	2014-05-27	2017-07-18	III	APPROVED	No	n/a	n/a
7	2705677	2014-08-01	2017-08-29	III	APPROVED	No	n/a	n/a
8	2705771	2014-10-27	2017-11-26	III	APPROVED	No	n/a	Yes
9	2705778	2014-11-13	2017-11-26	III	APPROVED	Yes	1230	Yes
10	2705877	2015-05-21	2018-06-16	III	COMPLETED	No	n/a	n/a
11	2705901	2015-06-25	2018-07-24	III	COMPLETED	No	n/a	n/a
12	2706041	2016-04-18	2019-05-17	III	COMPLETED	No	n/a	n/a
13	2706075	2016-06-08	2019-07-06	III	COMPLETED	No	n/a	n/a
14	2706097	2016-06-29	n/a	III	WITHDRAWN	Yes	416, 1230	No
15	2706120	2016-08-08	2019-09-02	III	COMPLETED	No	n/a	n/a
16	2706123	2016-08-11	2019-09-02	III	COMPLETED	Yes	318	Yes
17	2706127	2016-08-18	2022-09-16	II	RENEWAL	Yes	1230	Yes
18	2706166	2016-10-20	2022-11-18	II	RENEWAL	Yes	422, 678	No
19	2706167	2016-10-20	2019-11-18	III	COMPLETED	Yes	420, 739	No
20	2706182	2016-11-08	2022-12-07	II	RENEWAL	Yes	416	No
21	2706195	2017-01-10	2020-01-24	III	APPROVED	Yes	422, 678	Yes
22	2706255	2017-05-25	2020-06-20	III	APPROVED	No	n/a	n/a
23	2706345	2017-08-21	2020-09-18	III	APPROVED	Yes	415	Yes
24	2706367	2017-09-27	2020-10-26	III	APPROVED	No	n/a	n/a
25	2706373	2017-10-03	2020-11-01	III	APPROVED	No	n/a	n/a
26	2706384	2017-10-23	2020-11-21	III	APPROVED	No	n/a	n/a
27	2706492	2018-05-30	2021-06-26	III	APPROVED	Yes	416, 1208	Yes
28	2706532	2018-07-11	2021-08-07	III	APPROVED	Yes	416, 1208, 1230	No
29	2706540	2018-07-18	2021-08-16	III	APPROVED	Yes	416, 678, 1208	Yes
30	2706573	2018-09-04	2021-10-03	III	APPROVED	Yes	678, 1230	Yes
31	2706581	2018-09-06	2021-10-03	III	APPROVED	Yes	678	Yes
32	2706600	2018-10-08	2021-10-30	III	APPROVED	Yes	678	Yes
33	2706619	2018-11-13	2021-12-03	III	APPROVED	Yes	678	Yes
34	2706745	2019-07-25	2022-08-23	III	APPROVED	Yes	415, 677	Yes
35	2706750	2019-07-31	n/a	III	WITHDRAWN	No	n/a	Yes
36	2706756	2019-08-14	2022-09-12	III	APPROVED	Yes	675, 1208	Yes
37	2706774	2019-09-18	2022-10-15	III	APPROVED	Yes	415, 678	Yes
38	2706776	2019-09-25	2022-10-14	III	APPROVED	Yes	415	Yes
39	2706783	2019-10-02	2022-10-31	III	APPROVED	Yes	415, 418	Yes
40	2706813	2019-11-12	n/a	III	WITHDRAWN	No	n/a	n/a
41	2706815	2019-11-14	n/a	III	DISAPPROVED	Yes	415, 677	Yes
42	2706888	2020-04-30	2023-05-29	III	APPROVED	Yes	415, 418	Yes

**Legend Note**

6	Class III when originally received, renewed as Class II
17	In SOSEA but not within any NSO site circle
25	LFLO project, within SOSEA and NSO circle(s)
2	Pre-app review confirmed some NSO habitat, these areas were removed prior to submission of FPA

Tally	FP_ID	RECEIVED	EXPIRED	CLASS	DECISION	In Site Circle	Site #(s)	Pre-app review
1	2704272	2008-08-18	2012-09-15	II	RENEWAL	Yes	422, 677	Yes
2	2705608	2014-05-16	2017-06-13	III	APPROVED	Yes	416, 1230	Yes
3	2705778	2014-11-13	2017-11-26	III	APPROVED	Yes	1230	Yes
4	2706097	2016-06-29	n/a	III	WITHDRAWN	Yes	416, 1230	No
5	2706123	2016-08-11	2019-09-02	III	COMPLETED	Yes	318	Yes
6	2706127	2016-08-18	2022-09-16	II	RENEWAL	Yes	1230	Yes
7	2706166	2016-10-20	2022-11-18	II	RENEWAL	Yes	422, 678	No
8	2706167	2016-10-20	2019-11-18	III	COMPLETED	Yes	420, 739	No
9	2706182	2016-11-08	2022-12-07	II	RENEWAL	Yes	416	No
10	2706195	2017-01-10	2020-01-24	III	APPROVED	Yes	422, 678	Yes
11	2706345	2017-08-21	2020-09-18	III	APPROVED	Yes	415	Yes
12	2706492	2018-05-30	2021-06-26	III	APPROVED	Yes	416, 1208	Yes
13	2706532	2018-07-11	2021-08-07	III	APPROVED	Yes	416, 1208, 1230	No
14	2706540	2018-07-18	2021-08-16	III	APPROVED	Yes	416, 678, 1208	Yes
15	2706573	2018-09-04	2021-10-03	III	APPROVED	Yes	678, 1230	Yes
16	2706581	2018-09-06	2021-10-03	III	APPROVED	Yes	678	Yes
17	2706600	2018-10-08	2021-10-30	III	APPROVED	Yes	678	Yes
18	2706619	2018-11-13	2021-12-03	III	APPROVED	Yes	678	Yes
19	2706745	2019-07-25	2022-08-23	III	APPROVED	Yes	415, 677	Yes
20	2706756	2019-08-14	2022-09-12	III	APPROVED	Yes	675, 1208	Yes
21	2706774	2019-09-18	2022-10-15	III	APPROVED	Yes	415, 678	Yes
22	2706776	2019-09-25	2022-10-14	III	APPROVED	Yes	415	Yes
23	2706783	2019-10-02	2022-10-31	III	APPROVED	Yes	415, 418	Yes
24	2706815	2019-11-14	n/a	III	DISAPPROVED	Yes	415, 677	Yes
25	2706888	2020-04-30	2023-05-29	III	APPROVED	Yes	415, 418	Yes

**Legend Note**

4	Class III when originally received, renewed as Class II
25	LFLO project, within SOSEA and NSO circle(s)
2	Pre-app review confirmed some NSO habitat, these areas were removed prior to submission of FPA

Tally	FP_ID	Documentation / other comments
1	2703329	Project located outside any NSO related circle - original FPA was Class III prior to renewal as Class II
2	2704049	Project located outside any NSO related circle - original FPA was Class III prior to renewal as Class II
3	2704272	FPA Question 31 included note that WDFW biologist reviewed project area and determined no NSO conflict
4	2704562	SFLO (under 500 ac) project located outside 0.7 circle of any NSO site - no conflict or timing restriction as Class III
5	2704710	SFLO (under 500 ac) project located outside 0.7 circle of any NSO site - no conflict or timing restriction as Class III
6	2704904	Project located outside any NSO related circle - original SFLO FPA was Class III prior to renewal as Class II
7	2705546	LTA (Class III) Step 1 notes in Q#11 Additional Info that "Units 1 & 2 are outside all NSO habitat, per DNR, and outside 0.7 core circles of site centers
8	2705608	Per WDFW, site center was outside SOSEA boundary, thus critical areas rules did not apply
9	2705610	Project located outside any NSO related circle
10	2705615	Project located outside any NSO related circle
11	2705677	Project located outside any NSO related circle
12	2705771	IDT held, ICN #19581 noted in file - no mention of any NSO habitat on ICN
13	2705778	Q#31 Additional Info notes "2003 cruise data for FPA #2702794 approved for 2004 harvest of same area as Units 1 & 2, as not meeting NSO habitat, and other units cited as not meeting criteria per WAC 222-16-085
14	2705848	In SOSEA, but not in circle or any mapped habitat
15	2705877	Project located outside any NSO related circle
16	2705901	Project located outside any NSO related circle
17	2706041	Project located outside any NSO related circle
18	2706075	Project located outside any NSO related circle
19	2706097	Project withdrawn during review
20	2706120	Project located outside any NSO related circle
21	2706123	ICN #20459 documents confirming no NSO habitat, and 8/10/16 WDFW biologist email with attachment further documents non NSO habitat
22	2706127	Class III initially, ICN #20454 found, documents WDFW not comfortable removing typed habitat in Unit 1, thus proposed harvest was adjusted accordingly before FPA submission
23	2706166	Class III initially, plot data submitted as non-habitat, was field verified with ICN #20476 during review period
24	2706167	ICN #20476 found, documents field findings on NSO habitat

Tally	FP_ID	Documentation / other comments
25	2706182	Class III initially, as plot data submitted, IDT held and ICN #20481 documented non-NSO habitat
26	2706195	ICN #20476 documents that field review determined area as non-NSO habitat
27	2706255	Project located outside any NSO related circle
28	2706345	ICN #18963 and Gary Bell email noted - deemed harvest area as non-NSO habitat
29	2706367	Project located outside any NSO related circle
30	2706373	Project located outside any NSO related circle
31	2706384	Project located outside any NSO related circle
32	2706492	ICN #20319 and WDFW biologist email noted mixed results noted (some areas met habitat definition and should be bound out, and this FPA was revised prior to submission, following the pre-application review)
33	2706532	Plot data submitted as non-habitat - ICN #18348 noted for field review of FPA
34	2706540	ICN #20325 and related maps document project area as not meeting NSO habitat
35	2706573	WDFW biologist email from 5/24/18 notes area does not meet NSO habitat
36	2706581	WDFW biologist email noted from 5/24/18- says area is NHP and an ICN #22781 further documents findings
37	2706600	WDFW biologist email noted from 5/24/18 - mutiple project area synopsis
38	2706619	ICN #20325 documents non-NSO habitat, and was signed by WDFW biologist who attended IDT
39	2706745	WDFW biologist email noted from 5/24/18 - mutiple project area synopsis
40	2706750	WDFW biologist email noted from 5/24/18 - mutiple project area synopsis
41	2706756	WDFW biologist email noted from 5/24/18 - mutiple project area synopsis
42	2706774	WDFW biologist email noted from 8/12/19 - recommends area be changed to NHP
43	2706776	WDFW biologist email noted from 8/12/19 - recommends area be changed to NHP
44	2706783	WDFW biologist email 9/27/19 - notes area does not meet NSO habitat criteria
45	2706806	WDFW biologist email noted from 5/24/18 - mutiple project area synopsis
46	2706813	Project withdrawn during review
47	2706815	WDFW biologist email noted from 5/24/18 - mutiple project area synopsis - DISAPPROVAL was due to snow conditions obscuring slopes and streams
48	2706888	WDFW biologist email 9/27/19 - notes area does not meet NSO habitat criteria