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Department of
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Forest
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May 2008



**Twin Skin
Healthy Forests Restoration Act Project**

**Decision Notice and
Finding of No Significant Impact**

**Bonnors Ferry Ranger District
Idaho Panhandle National Forests
Boundary County, Idaho**

Unit 2
Photo taken May 2006



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Decision Summary

This Decision Notice documents my choice for a course of action for the Twin Skin Healthy Forests Restoration Act (HFRA) Project. I have decided to select and approve implementation of Alternative 2 as described in the project Environmental Assessment (EA) completed in March 2008, with a few minor prescription changes, as well as changes to the connected actions that resulted from resolution of some objection issues received from the public.

Alternative 2 (with changes described herein) includes a combination of mechanical treatments, hand treatments and prescribed burning to reduce forest fuels and the expected intensity of wildland fire on approximately 670 acres of the Bonners Ferry Ranger District.

Background

The Twin Skin HFRA Project is designed under the requirements of the HFRA and in response to the 10 year Comprehensive Strategy and focuses primarily on reducing hazardous fuels. The entire project area is within 1.5 miles of Moyie Springs, Idaho – a community with basic infrastructure and services (such as utilities and collectively maintained transportation routes) within or adjacent to Federal land where conditions are conducive to a large-scale wildland fire disturbance event. Such an event would threaten human life and property.

The project proposal concurrently addresses identified hazards and vulnerabilities described in the Boundary County Wildland/Urban Interface Fire Mitigation Plan (CWPP). The County Plan was developed in 2003 (Amendment 1 in February 2004 further defined the Wildland-Urban Interface) through a collaborative process between Boundary County citizens, federal, state and local agencies, non-profit organizations, and the private sector. The group formed several goals to begin mitigation of fire risk within the wildland/urban interface. These goals include fuels modification treatments within two miles of homes and associated infrastructure, including roads, in order to protect humans, their habitations and evacuation routes. The Twin Skin HFRA project area and treatment units are surrounded by and share common boundaries with private residences and associated infrastructures such as telephone and other service lines and municipal watershed infrastructure (copy of Boundary County CWPP and WUI map kept at Bonners Ferry district office).

The Twin Skin HFRA project is designed to accomplish fuels reduction treatments on National Forest System lands predominantly in the Lower Moyie River watershed of the Bonners Ferry Ranger District. The objectives of the project are to 1) reduce hazardous fuels within the Boundary County Community Wildfire Protection Plan (CWPP)-defined wildland urban interface (WUI) area and; 2) trend towards or maintain vegetative conditions that will be resilient to fire in the project landscape.

The project will remove surface, ladder and crown fuels through a combination of mechanical, hand, and prescribed fire treatments in order to change the fuel structure from timber with heavy surface fuels to timber with light surface fuels. This will decrease the overall expected fire intensities and likelihood for extreme fire behavior (torching, spotting, crown fire) and create a more predictable fire environment where direct attack suppression, in the case of a wildfire, would be a feasible and safe option for controlling a fire near the at-risk community. The overall goal of reducing forest fuels is to increase firefighter and public safety. Treatments as designed would remove fuels in all layers and would encourage the utilization of forest

products, including biomass, to the fullest extent possible.

The project area is located in the vicinity of Deer and Skin Creeks just north of the town of Moyie Springs, Idaho within Sections 19, 29 and 30, Township 63 North, Range 3 East, Section 24, Township 63 North, Range 2 East, and Section 2, Township 62 North, Range 2 East of the Boise Meridian, on the Bonners Ferry Ranger District of the Idaho Panhandle National Forests, Boundary County, Idaho. The project area encompasses approximately 4,600 acres with treatments on approximately 670 acres (see EA Errata Sheet, page 5).

The Twin Skin HFRA project was designed through a collaborative process starting on January 31, 2007 and included two additional collaborative meetings, including a field trip to the project area. The collaborative group developed a treatment proposal for the area. The meetings culminated in the mailing of a public scoping letter on September 10, 2007 to 117 individuals, organizations and agencies to gather comments for the proposed action. The comment period ended October 10, 2007. Issues identified in this process were used to analyze the expected effects from implementing the proposed action and no action alternatives, and have been disclosed in the Project EA that was completed and issued in March 2008. The EA was made available to the public for a 30 day review and objection process pursuant to 36 CFR Part 218 Subpart A.

On April 7, 2008 objections to the Proposed Action were received from the Idaho Conservation League (ICL). In their objection letter, the ICL requested a resolution meeting and Linda McFaddan, the Bonners Ferry District Ranger arranged for a meeting via conference call for April 25, 2008, inviting members of the collaborative group to also attend and try to resolve the issues brought up in the objection letter. On April 21, 2008, the District Ranger contacted Jonathan Oppenheimer, representative of the ICL, to discuss the objection and at that time they were able to negotiate some changes, such as dropping the connected actions of incidental salvage and noxious weed treatments. They were both in agreement that an additional meeting would not be needed. Therefore, the conference call scheduled for April 25, 2008 was cancelled. The outcome of the discussion between the District Ranger and Jonathan Oppenheimer with the ICL are discussed below.

In spite of the resolution of some of the objector's issues, the ICL did not wish to withdraw their objections, preferring to let the Reviewing Officer conduct the administrative review. On May 09, 2008 Reviewing Officer Kathy McAllister (USDA Forest Service, Northern Region) concluded her review of the project objections pursuant to 36 CFR 218.8 (7)(b) and issued her decision on the disposition of the objection.

The Reviewing Officer determined that the project is in compliance with laws and regulations, and clearly demonstrates how the project is consistent with the HFRA, including use of a Community Wildfire Protection Plan. The objection process, issues raised in the objection, and resolution to the issues are discussed thoroughly later on in this document.

As stated pursuant to 36 CFR 218.10(b)(2), this project is not subject to further administrative review by the Forest Service or the Department of Agriculture.

Decision

I have decided to select Alternative 2 as described in the Twin Skin HFRA Environmental

Assessment issued in March 2008, but with two connected actions dropped from the planned activities, as a result of agreements made with the ICL on April 21, 2008. The two connected actions that will be dropped involve the future salvage opportunities and noxious weeds treatments using herbicides (Connected Actions #1 and #2, EA page 16).

In addition, Alternative 2 as summarized in the EA, proposed treatment on 713 acres. However, a few changes have been made since that time, involving a reduction in overall treatment acres and a few modifications to the original prescriptions (some prescriptions are becoming less “intensive” due to on-the-ground factors and to better meet the purpose and need). Alternative 2 now references Figure DN-1 and Table DN-1 and proposes to reduce fuels by mechanical treatments on 625 acres, hand treatment on 45 acres (for a total of approximately 670 acres) and to reduce pockets of fuel using optional biomass removal and prescribed fire (pile burning and underburning) on all 670 acres within the 4,600 acre project area. The unit modifications that have occurred since publication of the EA are as follows:

- Originally, a 22 acre unit would have been precommercially thinned followed by grapple-piling and pile burning. However, after the Twin Skin Environmental Analysis was published, it was discovered that the precommercial thin unit had already been completed under a previous environmental decision. Therefore, the 22 acre precommercial thin unit will not be included for treatment under this decision.
- Unit 9 was originally proposed and analyzed as a 26 acre Group Selection to be skyline harvested then underburned. However, recent reconnaissance data has helped determine that this unit should be split into two units based on topography and species composition. Unit 9 will be dropped to approximately 20 acres and will remain a Group Selection. A small portion of the original 26 proposed acres, approximately 5 acres, will now be designated as Unit 9A and will be treated as a commercial thin. Group selections and commercial thins are visibly similar in most places but a group selection prescription allows for openings of 1-3 acres between areas that are commercially thinned in order for regeneration to become established. A commercial thin is considered an intermediate treatment while a group selection is uneven-aged management – the long-term ecological goal of a group selection is for the establishment of multiple age classes. Both units will be skyline harvested followed by an underburn to treat surface fuels.
- Unit 11 was included in the environmental analysis as a ‘weed and release and improvement cut’ prescription (WR/IC) totalling 40 acres. The ‘improvement cut’ portion of the prescription would have allowed for the harvest of some larger merchantable timber. More recent reconnaissance has led to the determination that a weed and release prescription without the improvement cut will best meet objectives for fuels reduction. ‘Weed and release’ will remove some of the dead and dying regeneration in order to facilitate the development of seral species such as larch and white pine. The ‘improvement cut’ portion of the prescription will be dropped. Surface fuels reduction will remain the same – option to utilize biomass or grapple piling followed by pile burning.
- Unit 13 was included in the environmental analysis as a weed and release and improvement cut prescription totalling 46 acres. The advanced regeneration would have been thinned to specific size and species criteria, while some of the mid and

overstory trees remaining from the previous entry would have been commercially harvested. To adhere to the design criteria associated with heritage resources (as described below), the decision includes splitting this unit into two. Approximately 10 acres will be dropped to exclude the old flume from Skin Creek. Unit 13 will remain a weed and release and improvement cut prescription and will total 25 acres. To best accomplish fuels reduction objectives, treatment in Unit 13A (11 acres) will be treated utilizing a weed and release prescription (the improvement cut portion will be dropped and no merchantable timber will be cut because very little exists in this smaller area). Surface fuels reduction will remain the same – option to utilize biomass or grapple piling followed by pile burning.

The fuels reduction work will be governed by a timber sale contract to remove more than 20 tons per acre of dead surface fuels, in addition to standing live and dead ladder and crown fuels including sawtimber and other biomass (small trees, tops and limbs) that are excess to other resource needs such as for maintaining soil productivity, large down woody material for wildlife and to reduce soil disturbance and compaction during treatment activities.

Design Criteria and Mitigations

During the design phase of the project various measures were incorporated to minimize potential impacts and to avoid resource damage. My decision includes the design criteria detailed in the descriptions below. Specialist reports in EA Appendix A and B detail and rate the effectiveness of these design criteria mitigation measures for the proposed action.

1) No new permanent roads will be constructed.

Interdisciplinary team meetings, field reconnaissance and a roads analysis process (RAPS meeting on March 8, 2007) determined that existing access roads, including Forest Roads #435, #435UF, #2215, #2215A, #2215B, #2269, #2533, #2404A, #2549, #2584, #2584U, #2549UH, #2549UE and #627 may be used for this project. Segments of these roads (totaling approximately 14 miles) would require maintenance (reconditioning) or reconstruction (#2549UH and #2549UE) prior to use. Related work may include roadside brushing, blading, ditchline cleaning and shaping, spot graveling and culvert installation and replacement at locations recommended by the project IDT and removal of hazard trees along the haul routes. It is anticipated that up to one and one-half mile of temporary roads may be needed to access timber in Units 2 and 10 (See Figure 1 below). The temporary roads would be obliterated by the contractor following use. The obliteration would restore the segments to their pre-road condition and would be revegetated and covered with slash to prevent off-road vehicle use. Existing roads associated with Units 16, 17 and 18 (within the Keno BMU) requiring the removal of vegetation to make them drivable (“reconstruction” of #2549UH and #2549UE) will also require a mechanism (such as the placement of large woody debris or an earthen barrier) to prevent vehicle access after completion of project activities. During project implementation a method to prevent private vehicle use of these reconstructed roads would be necessary (such as using equipment as barriers).

2) Logging/mechanical treatment mitigations and restricted operations. These include:

- **Wildlife:**

- 1) In order to minimize disturbance to grizzly bears during project implementation, all timber harvest and road reconstruction and reconditioning that will take place within the Keno BMU (Units 16, 17 and 18) will occur outside the spring bear season (April 1 to June 15). This period will overlap with activity restrictions for gray wolf as follows:
- 2) No timber harvest to occur in Units 16, 17, and 18 from April 1 through August 15 due to their proximity to recent gray wolf sightings in the Solomon Lake area. However, road reconstruction and reconditioning can occur during this time period - outside of the spring bear season (after June 15th).
- 3) In addition, roads 2549UH and 2549UE will be made impassable to public traffic during and after implementation of the Twin Skin project (as mentioned in the previous section).
- 4) To reduce the chance of grizzly bears foraging along open roads and motorized trails, clover or similar species would not be included along open roads and motorized trails.
- 5) Appropriate provisions for site sanitation would be included within the pertinent contract operations associated with the implementation of the proposed activities.

- **Cultural Resources:**

For Units 9, 10, and 13: A hydraulic flume extending from the northern boundary of Unit 9, through Units 9, 13, and ending within Unit 10 will be excluded from treatment units by 50 feet on either side. No mechanical activities, including yarding of trees/logs shall take place in the exclusion area. In the rare case that skyline yarding across the flume needed to occur, where logs are suspended, specified locations must first be approved by an archeologist and marked or otherwise designated prior to harvest.

For Unit 14: All identified features of The Moyie Mine resource will be avoided by project actions and buffered outside of treated areas through unit boundary marking. The following standards will be used to ensure the aforementioned areas adjacent to treatment units will be excluded:

- 1) Geomorphic features such as terraces or benches and/or cultural features such as roads and trails that are easily identified on the ground should separate the site from project actions where possible.
- 2) If natural or cultural buffers are not available, buffer distances used to protect sites should be sufficient to generally preclude inadvertent damage based on the type of planned activity (i.e., 50-foot buffer)
- 3) A pre-implementation plan-in-hand review of avoidance procedures must be completed involving the implementation staff and appropriate Zone or Forest Archaeologist immediately prior to harvest activities.

- **Sensitive Plants and Forest Species of Concern:**

Field surveys conducted in 2006 identified new occurrences of groundpine in Unit 1 and arrowleaf coltsfoot in Unit 13. Site-specific buffers were established by the project botanists – no project related activities will occur in these buffered areas. The buffer for the groundpine is 120 feet in all directions and 2 tree-lengths for the arrowleaf coltsfoot to provide retention of the canopy cover for the populations and to ensure enough distance from machinery to prevent

disturbance – unit layout will be done by the project botanists to exclude these populations outside of unit boundaries.

- **Soils:**

For tractor-yarded Units 1, 3, 6, 7, 8, 12, 13, 14, 15, 16, 17 and incidental tractor in Unit 18:

- 1) Ground-based yarding, processing, and harvester equipment will operate on slopes under 35% and will utilize existing skid trails and slash mats where possible. Slash mats will be required for operating ground disturbing equipment where the current detrimental disturbance is equal to or exceeds 10%.
- 2) All new skid trails will be agreed upon and designated on the ground by the Purchaser and the Forest Service before felling begins.
- 3) Main skid trail spacing will average 100 feet or greater on ground skidded units, except where the trails converge to landings and as terrain dictates otherwise. All other trails will be spaced at maximum reaching distances.
- 4) Where there is not enough material for an adequate slash mat, mitigation will include winter only harvesting in order to comply with Forest Plan Standards for detrimental disturbance. This would be necessary for the 'Improvement Cut' activities in Units 12 and 13. Any one of the following conditions will be contractually required for tractor-yarded Units 12 and 13:
 - A 24-inch snow layer or 18 inches of settled snow or;
 - A slash mat in combination with 12 inches of settled snow or;
 - Frozen ground to a depth of 4 inches.
- 5) Post-harvest, all utilized skid trails will be either covered with slash and randomly placed logs (on contour) to increase the microtopography needed to reduce runoff, stabilized with waterbars, or a combination thereof.
- 6) Operating equipment will avoid moist or wet depression areas unless properly protected by snow or frozen conditions, especially during rain-on-snow events. This specifically applies to units 1, 8, 13, and 17; where wet areas have already been identified on the landscape, they have been buffered out of treatment units.

For skyline-yarding Units 2, 4, 5, 9, 9A, 10, and 18 – the leading end of logs will be suspended during skyline yarding.

3) Additional Mitigation Measures:

- **Noxious Weed Control:**

Equipment used for logging and road reconstruction will be required to be pressure-washed prior to being allowed in the project area. Currently suitable timber sale contract provisions for washing equipment for noxious weed control purposes will be used.

- **Soil Compaction:**

Existing landings will be utilized where appropriate in order to maintain current soil compaction levels. All skid trails utilized will be covered with some residual slash (within guidelines provided by Graham et al. 1994 for coarse-woody debris by habitat type), waterbarred and seeded as needed upon completion of the sale. Grapple-piling equipment would operate from these skid trails or on a slash mat on slopes under 35 percent.

- 1) As mentioned, temporary roads constructed for use during project implementation will be decompacted, re-contoured, and seeded following implementation of treatment activities.

- **Soil productivity and nutrient cycling:**

Based on average results obtained from two separate field surveys conducted for soils and fuels, Forest Plan Standards for maintaining an adequate supply of large down-woody material for soil productivity and nutrient recycling are currently being met in the project area and will be maintained (see Fire and Fuels Specialist Report – Appendix A).

- a. The latest soil nutrient management recommendations from the Intermountain Forest Tree Nutrient Cooperative (IFTNC) and Rocky Mountain Research Station (RMRS) would be applied as appropriate to each activity area where organic material is removed. Slash would be left to recycle nutrients back into the soil until site-prep occurs. Grapple piling equipment would operate on slopes under 35 percent.
- b. Downed woody retention levels will be maintained at the lowest recommended levels due to concern for fire hazard in the interface area. For the moist forest habitat types where treatment is proposed in Units 1, 3, 4, 5, 6, 8, 11, 12, 13, 13A, 14, and 15, Graham et al (1994) recommend retaining 17-33 tons of downed woody material greater than three inches in diameter. For the drier habitat types associated with Units 2, 7, 9, 9A, 10, 16, 17, and 18 the recommended retention level is 7-13 tons/acre.
- c. As this is a hazardous fuels reduction project within the wildland urban interface, determination of fire hazard where slash is left untreated for prolonged periods of time will be made by the district fire management officer. Where fire hazard is considered high, especially along shared boundaries with private property or heavily-used roads, flexibility will be given to treat slash prior to it being left for several months.
- d. An alternative slash disposal method for units where grapple-piling is proposed to treat activity and natural surface fuels will be to remove slash, excess to the desired Graham guideline levels and following at least one wetting season, at the option of the timber sale purchaser to utilize this material for biomass energy, biofuels, or other uses. The need for post-harvest slash piling and burning may be reduced or even eliminated in these units.
- e. Prescribed underburning and pile burning would take place when the upper surface inch of mineral soil has a soil moisture content of 25 percent by weight. Prescribed underburning generally takes place in the spring while pile burning takes place in the fall.

- **Snag Resource:**

The District would manage for the snag resource by following the “Regional Snag Management Protocol” (January 2000), which calls for retention of:

1. Moist Forests - 6 to 12 snags per acre with 2 to 4 snags/acre greater than 20 inches, as well as 12 live tree replacements per acre of the largest representative trees in Units 1, 3, 4, 5, 6, 8, 11, 12, 13, 13A, 14, and 15.
2. Dry Forests – 4 to 6 snags per acre (4 over 20 inches in diameter) and 8 live tree replacements of the largest representative trees in Units 2, 7, 9, 9A, 10, and 16-18.

Based on reconnaissance cruises conducted for the project, most of the project units currently have an adequate number of total snags per acre, but are lacking in large diameter snags >20" dbh in some areas – recommendations for wildlife tree recruitment and future snags is described below. Even where adequate snags are present, there is a concern regarding the longevity of the snags – many are a result of mortality related to rot. These snags, such as grand fir, have a high fall-over rate, thus not only losing their quality as snags, but adding to the surface fuels. In addition, during contract implementation, the purchaser must evaluate each snag for safety and therefore, many may be cut to reduce the hazard associated with working around dead trees. Units 11, 12, 13 and 13A currently have less than 1 10-inch or greater diameter snag per acre due to these being 15-year old seed tree units.

The shortage in snags over 20 inches in diameter is likely due to past sanitation salvage and firewood cutting treatments conducted in the area over the past several decades that removed the largest dead and dying trees. The proposed treatment is designed to retain large-diameter live trees and also dead trees over 20 inches in diameter, especially ponderosa pine, western larch, western redcedar, western white pine – if not available, followed by Douglas-fir, and some hemlock, and grand fir. These residual trees can be managed for snag recruitment trees to increase the number of 20-inch-plus diameter snags in the future.

- **Wildlife:**

All listed species in the Biological Evaluation:

If any threatened, endangered, or sensitive species are located during project layout or implementation, management activities would be altered, if necessary, so that proper protection measures can be taken. Timber sale contract provisions that require the protection of Threatened, Endangered and Sensitive Species would be included in the timber sale contract.

The wildlife biological evaluation for this project included the following conservation requirements and/or recommendations, which would be incorporated into project implementation:

- a. Goshawk Nest Site Protection (required): Additional nest searches would be conducted during project layout and implementation. Operations and related activities would be suspended within ½ mile of known or discovered nests between March 15 and August 15 to reduce risk of failure. Activity restrictions can be removed after June 30 if nest site is determined by a wildlife biologist to be inactive or unsuccessful. Existing and newly discovered nest sites would be protected by a no-activity buffer around each active nest tree (greater than 150 foot radius) and a 40-acre, no activity buffer around the nest area to provide long-term nesting habitat (Reynolds et al. 1992).

- b. Wildlife Tree Retention (required): Snags and live tree replacements would be retained where opportunities exist in treatment units at levels recommended by the USFS Region 1 Snag Protocol (see previous discussion). While retention objectives are accounted for on a treatment level scale, some snags would be represented on every 10 acres of treatment, in clusters or clumps where feasible, to promote good distribution of snags. Road Design: The location of the temporary roads will ensure, whenever practical, that veteran and relic survivor trees and snags would not be removed during construction. Skid Trail and Cable Corridor Location: The sale administrator will ensure, whenever practical, that the design of skid trails and cable corridors avoid veteran and relic survivor trees and snags. Large diameter snags (greater than 16 inches diameter) that are felled for safety reasons would remain on site to provide for large woody debris recruitment and long-term site productivity. Selection of snags and live tree replacements would emphasize practices that assure the highest probability for long-term retention (Bull et al. 1997). The high hazard snags and snags in the advanced stages of decay would not be used to meet retention objectives. Retention practices would focus on ponderosa pine, western larch, Douglas-fir and western red cedar trees, especially veteran or relic ponderosa pine and western larch trees. Trees killed by root disease should be avoided, where possible, to meet retention objectives because of their rapid deterioration and resulting fall-down rate.
- c. Maintain Veteran and Relic Structure and Habitat for Snag-dependent Species: No old-growth stands are proposed for treatment. However, to maintain habitat for snag-dependent species, areas within treatment units that contain small pockets of older, large diameter structure will be thinned from below or not treated. These unique areas would be managed on a case-by-case basis. Vegetation type, moisture regime, logging system, wildlife species suitability and surrounding treatments will all be considered. The tree-marking guide would assure a diversity of snag structural classes and the highest probability for long-term retention.
- d. Protection of cedar swales and retention of hardwood trees: Microsites of western redcedar having diameters greater than 12 inches dbh will be retained.
- e. Retention of Hardwood Trees: To maintain forest species diversity and wildlife habitat, aspen and birch trees would not be harvested for pulp. If trees of these species needed to be cut for safety reasons, they would remain on site for coarse-woody debris and long-term site productivity.
- f. Grapple Piling (recommended): Where grapple piling is prescribed for post-harvest fuel reduction, leave an occasional slash pile (i.e. 1 per 3 acres) where deemed appropriate by the District Fire Management Officer, to provide habitat for small forest animals (e.g. snowshoe hares), while still meeting fuels reduction objectives.
- **Aquatics:**

No-harvest buffer zones for lakes, streams, wetlands and other riparian habitat have been

included in and adjacent to harvest units as designed by the project fish biologist, hydrologist, botanist and soil scientist utilizing Inland Native Fish Strategy (INFS) standards and other site-specific recommendations (including BMPs). Treatment area boundaries have been identified to exclude the RHCA (there are no activity units that overlay RHCA areas). RHCA widths are as follows:

- Fish Bearing Perennial Streams – 300 feet from the edge of both stream channel banks
- Non Fish Bearing Perennial Streams – 150 feet from the edge of both stream channel banks
- Ponds, Lakes, Reservoirs, Wetlands greater than 1 acre – 150 feet from the edge of the riparian vegetation or seasonally saturated soil
- Seasonally flowing or intermittent streams and wetlands less than 1 acre – 100 feet slope distance

No project related activities will occur within these RHCAs (see Fisheries BA/BE in Appendix B) – the fisheries analysis determined that project activities would not have any direct or indirect affect on fisheries habitat including temperature, sediment delivery, large woody debris, or water yield.

Table DN-1 - Fuels Reduction Treatments by Unit

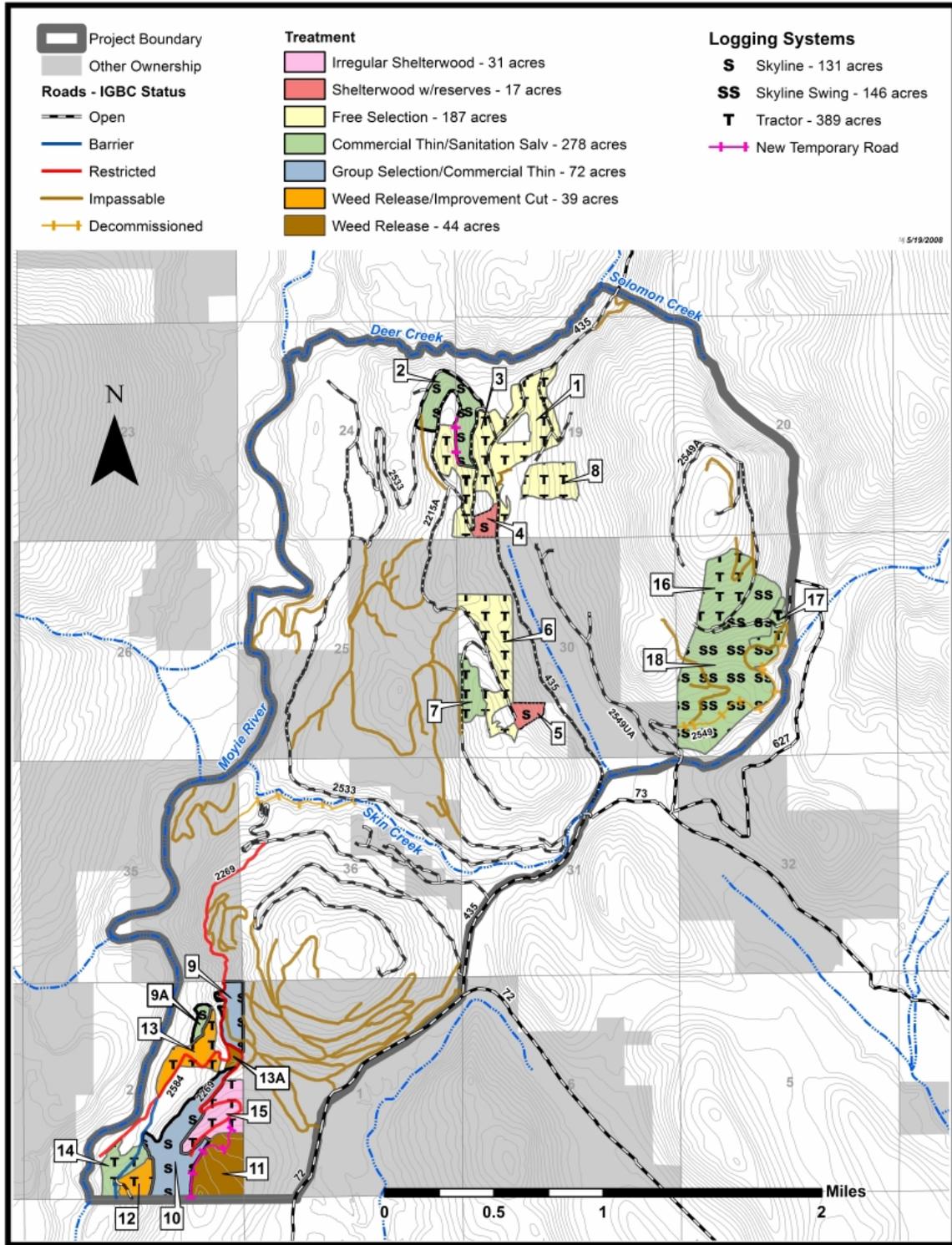
Unit	Acres	Harvest Type and Logging System	Slash Disposal Method	Residual Stand General Characteristics
1	52	Free Selection Tractor	Grapple pile and burn or optional biomass removal. Machines stay on existing trails, operate on slash mats where available and stay off slopes that exceed 35%.	Cedar, Douglas-fir and grand fir 14-28" in diameter with some smaller diameter western larch (9-13" diameter). Plant white pine and larch.
2	36	Commercial Thin/Sanitation Salvage Skyline	Grapple pile and burn or optional biomass removal. Machines stay on existing trails, operate on slash mats where available and stay off slopes that exceed 35%.	Mostly cedar, Douglas-fir and larch 10-20" in diameter.
3	58	Free Selection Tractor	Grapple pile and burn or optional biomass removal. Machines stay on existing trails, operate on slash mats where available and stay off slopes that exceed 35%.	A mixture of cedar, larch, grand fir, Douglas-fir, and hemlock 14-26" in diameter.
4	9	Shelterwood Skyline	Grapple pile and burn or optional biomass removal. Machines stay on existing trails, operate on slash mats where available and stay off slopes that exceed 35%.	Mostly DF and cedar 12-20" in diameter – will plant larch and white pine.
5	8	Shelterwood Skyline	Grapple pile and burn or optional biomass removal. Machines stay on existing trails, operate on slash mats where available and stay off slopes that exceed 35%.	Mostly DF and cedar 12-20" in diameter – will plant larch and white pine.
6	52	Free Selection Tractor	Grapple pile and burn site prep for planting. Machines stay on existing trails, operate on slash mats where available and stay off slopes that exceed 35%. Plant white pine and larch.	Mixed conifer 14-24" in diameter. Will plant larch and white pine.
7	18	Commercial Thin/Sanitation Salvage Tractor	Underburn or Grapple pile and burn or optional biomass removal. Machines stay on existing trails, operate on slash mats where available and stay off slopes that exceed 35%.	Almost entirely DF greater than 14" in diameter.
8	25	Free Selection Tractor	Grapple pile and burn or optional biomass removal. Machines stay on existing trails, operate on slash mats where available and stay off slopes that exceed 35%.	Cedar, Douglas-fir and grand fir 14-28" . Plant white pine and larch.
9	20	Group Selection Skyline	Underburn	Approximately 90% of residual trees will be Douglas-fir and ponderosa pine 16-28" in diameter
9A	5	Commercial Thin/Sanitation Salvage Skyline	Underburn	Approximately 60% of residual trees will be large, 16-30" dbh, Douglas-fir, followed by western larch and a smaller percentage of cedar and white pine.
10	54	Group Selection Skyline	Underburn	92% of residual trees will be Douglas-fir 16-28" in diameter. Some relict ponderosa pine. Interplant ponderosa pine in openings
11& 13A	44	Weed and Release No Harvest Equipment	Option to grapple pile and burn. Machines stay on existing trails, operate on slash mats where available and stay off slopes that exceed 35%.	Overstory trees will not be harvested, the residual trees will be primarily submerchantable larch, white pine, ponderosa pine, and Douglas-fir.
12 & 13	39	Weed and Release/Improvement Cut Tractor/Winter	Grapple pile and burn or optional biomass removal. Machines stay on existing trails, operate on slash mats where available and stay off slopes that exceed 35%.	Overstory - mostly cedar, Douglas-fir, and larch greater than 18" in diameter will remain.

Unit	Acres	Harvest Type and Logging System	Slash Disposal Method	Residual Stand General Characteristics
14	20	Commercial Thin/Sanitation Salvage Tractor	Grapple pile and burn or optional biomass removal. Machines stay on existing trails, operate on slash mats where available and stay off slopes that exceed 35%.	Mixed conifer 10-20" in diameter (cedar, larch, Douglas-fir, grand fir, hemlock, white pine).
15	31	Shelterwood Tractor	Grapple pile and burn or optional biomass removal. Machines stay on existing trails, operate on slash mats where available and stay off slopes that exceed 35%.	Cedar, Douglas-fir and western larch 14-20" in diameter. White pine and larch planted in openings
16	42	Commercial Thin/Sanitation Salvage Tractor	Grapple pile and burn or optional biomass removal. Machines stay on existing trails, operate on slash mats where available and stay off slopes that exceed 35%.	Primarily Douglas-fir with some western larch and ponderosa pine 10-18" dbh.
17	11	Commercial Thin/Sanitation Salvage Tractor	Grapple pile and burn or optional biomass removal. Machines stay on existing trails, operate on slash mats where available and stay off slopes that exceed 35%.	Douglas-fir, ponderosa pine, and western larch 12-16" dbh.
18**	146	Commercial Thin/Sanitation Salvage Skyline Swing**	Grapple pile and burn or optional biomass removal. Machines stay on existing trails, operate on slash mats where available and stay off slopes that exceed 35%.	Generally large diameter trees with full live crowns. Mostly DF and PP 12-20 inches in diameter.
Incidental Hazard Tree Removal along FS Haul Routes	Up to total of 15 acres*	Individual tree removal from roadsides at widely scattered locations. 1-2 trees in any single spot and within striking distance of road.	Lop and scatter. No off-road equipment necessary. Cable yard incidental single trees to roadside or remove from road surface if they have fallen on road.	No detectable change from existing condition.

*Not included in the 670 treatment acres. Hazard tree removal along haul routes for public safety.

**Up to 50 acres of this unit will be tractor yarded.

Figure DN-1 – Treatment Area Map



Monitoring

Information gathered before, during and after implementation of activities is used to determine the effectiveness of the project’s design and associated mitigation measures. This establishes a feedback mechanism so management can develop and employ an adaptive learning curve. Monitoring is done at recurring intervals as a basis for Forest Plan implementation. Project

effectiveness monitoring is done by sampling specific projects at specified time intervals. The activities associated with this proposed action will include monitoring of the following:

Fuels Reduction: As designed, the project is expected to reduce surface, ladder, and crown fuels. The effectiveness of fuels reduction activities to accomplish this will be periodically checked, through the use of fuels transects and photo points, by the district Fuels Planner and other members of the local fire organization.

Temporary Road Obliteration: The effectiveness of road and skid trail obliteration and erosion control will be periodically checked by hydrology, soils, road management, or timber personnel.

Soil Compaction: The effectiveness of prescribed Best Management Practices (BMPs) of winter logging and redistributing residual slash over skid trails to help prevent erosion will be checked by soils, hydrology, timber, or fisheries personnel.

Down Woody Debris: During project contract administration the amount of debris left in the mechanical treatment and grapple-pile units needs to meet recommended minimum levels. Accomplishment of this activity will be monitored by timber, fuels, or soils personnel.

Northern Goshawk: Goshawk detection surveys were conducted within the project area in 2007. Although a foraging bird was detected in Unit 18, no nests were discovered as a result of these surveys and there has been no documented nesting in or near the project area in the last five years. The proposed action may cause temporary reduction in northern goshawk nesting habitat at a local level, but would not likely indicate a local or regional change in habitat quality or population status (EA Appendix B page 72).

Timber Sale Administration and wildlife personnel will continue to monitor the project area for goshawk presence during project implementation. If any nests are discovered during implementation the design criteria listed on page 10 would be followed.

Gray Wolf: Any gray wolf den or rendezvous sites identified in or adjacent to proposed activity areas will be spatially and/or temporally buffered as appropriate. This would include:

No project activities within one (1) mile of occupied sites from April 1-July 1 for den sites and from July 1-August 15 for rendezvous sites. Upon review by the Forest Level 1 team, these distances could decrease based on topographical characteristics at each site.

Grizzly Bear (and all listed species): If any threatened, endangered, or sensitive species are located during project layout or implementation, management activities would be altered, if necessary, so that proper protection measures can be taken. Timber sale contract provisions that require the protection of Threatened, Endangered and Sensitive Species would be included in the timber sale contract.

Noxious Weeds: The effectiveness of design criteria for minimizing the spread of existing noxious weeds in the project area will be monitored by district personnel (noxious weed program manager, botanist and others) during and after project implementation. Noxious weeds within this project are expected to be treated at a future date following completion of a new noxious weeds program analysis and decision document.

Rationale for the Decision

Now that I have identified my decision and described the activities that will occur, let me explain my rationale for selecting Alternative 2 (with changes described herein).

I based my decision on how effective Alternative 2 would be compared to the alternative of doing nothing (No-Action Alternative 1, for baseline comparison) in meeting the purpose and need for this project.

The Twin Skin HFRA EA Project is designed under the requirements of HFRA and for the purpose of responding to the 10-year Comprehensive Strategy (December 2006), focusing primarily on reducing hazardous fuels in the wildland urban interface (WUI).

The project concurrently addresses identified hazards and vulnerabilities described in the Boundary County Wildland/Urban Interface Fire Mitigation Plan (CWPP). The County Plan was developed in 2003 (amended February 2004) through a collaborative process and several goals were identified to begin mitigation of fire risk within the wildland/urban interface. These goals include fuels modification treatments within two miles of homes and associated infrastructure, including roads, in order to protect humans, their habitations and evacuation routes. The Twin Skin HFRA project area is surrounded by and shares common boundaries with private residences and associated infrastructures (copy of Boundary County CWPP and WUI map kept at Bonners Ferry district office).

In the wildland urban interface – where people live, work and recreate – letting a wildfire burn is not an option. Fires that exhibit a high resistance to being controlled are especially undesirable because they jeopardize public and firefighter safety. High-intensity fire is often associated with rapid fire spread and flame lengths that put the fire outside of the capabilities of any resource (firefighters, dozers or excavators, or aerial resources) to bring a fire under control using direct attack suppression tactics. Forest composition and structure that facilitates this type of fire behavior includes heavy continuous surface fuels and ladder fuels such as brush and small trees under a dense overstory. Based upon field data and information gathered by project team members who specialize in fire and fuels management, the existing condition of the project area is consistent with this type of forest structure and composition, making the area susceptible to intense wildfire behavior as described. There exists a need to change the current fuels structure so that a slow-burning surface fire would be expected during a wildfire (i.e. minimal ladder fuels with light timber litter under an open forest canopy).

Given the fuels condition and location of the Twin Skin HFRA project area so close to developed and high-use interface areas, my main concern was focused on implementing fuels reduction treatments that would be effective at reducing the potential intensity of future fires. Based on the analysis provided in the EA (Chapter 3) and supporting documents (EA Appendix A), implementation of Alternative 2 (with changes described herein) will address these needs as follows:

- reduce the surface fuel loads to decrease surface flame lengths
- increase the canopy base heights by removing live and dead ladder fuels to minimize tree torching and initiation of crown fire
- space tree crowns to minimize the risk of fire moving through the residual stand of timber.

Fires ignite in the surface fuels and build initial intensity there before they can move into the tree crowns. A project that is designed to treat crown fuels only, without addressing surface fuels will be unsuccessful – the likelihood for crown fires may decrease, but the intensity of surface fire will not, and may even increase (EA page 43). For these reasons, the surface is a good starting point for evaluating project effectiveness at reducing fuels – the project proposes to remove approximately 15-20 tons per acre of woody surface material.

Here's an example to put the fuels reduction effectiveness in perspective: There are approximately 4,000 btu's of heat per pound of wood having 50% moisture content¹. So an average of 17.5 tons of wood per acre contains about 140 **million** btu's per acre of heat that will be removed from the project area, or nearly 94 **billion** btu's total from the 670 acres in the project area that will remove wood products. In terms of "turning down the heat" by removing this amount of wood from the project area, if all the wood were used to fuel an average-sized pellet stove having the capacity of 50,000 btu's per hour, which is capable of heating a 2,000 square foot home, there would be enough fuel to heat either 215 homes for one year or one house for about 215 years (that's running the pellet stove 24 hours a day, 365 days a year)! That doesn't include the tons of material that will be removed in the ladder and crown fuels.

Because the treatments will leave very little ladder fuels and a more open canopy, crown fire initiation will be very difficult. Crown fires display the most extreme fire behavior and exhibit a high resistance to control – they have flame lengths that exceed the ability of any type of direct attack and have very high rates of spread. An example of this is the Sundance Fire, which occurred in Bonner and Boundary County in the summer of 1967. This was an extremely fast moving fire, growing from approximately 4,000 acres to 56,000 acres in 12 hours, just missing Bonners Ferry. Although large scale fires were common in recent history (as displayed on page 31 of the EA), large scale crown fire would now be undesirable for this area as it is surrounded by private land and dwellings, and is so close to the community of Moyie Springs, Idaho.

On pages 34 through 45, the EA summarized the determinations on the effectiveness of treatments to reduce fuels and the effect on fire behavior in the project area as follows:

Table DN-2. Summary of Effectiveness at Reducing Fuels

	Alternative 1 Current Condition	Alternative 2
Surface Flame Lengths (Feet)	4.0	1.4
Canopy Base Heights (lowest height above ground where canopy fuels exist – in feet)	1-3	40
Probability of Torching (%) (Surface fire movement into the tree crowns)	80	0
Ability to Direct Attack (Using ground resources)	No	Yes

The table above displays results from fire behavior modeling for the current condition (or Alternative 1 – No Action) and Alternative 2. Surface flame lengths under the current

¹ GTR FPL 29, 1979 - How to Estimate Recoverable Heat Energy in Wood or Bark Fuels, Ince, P.

condition are 4 feet – right at the upper limit for direct attack by ground resources (EA, Chapter 3, page 34). However, the current canopy base heights are below 4 feet, thus the likelihood of a surface fire moving into the tree crowns is high – the probability of torching is currently 80%.

Decreased surface flame lengths resulting from project activities (to less than 2 feet) will allow for firefighters to more safely direct attack a wildfire in order to bring it under control (as fire suppression is a required action in this area). Successful suppression will improve the safety of humans, their homes, associated access roads, and utility lines. Lower surface flame lengths, less ladder fuels, and increased canopy base heights to a point beyond the reach of surface flame lengths will reduce the probability of torching to near zero for several years into the future (EA, Chapter 3, page 41). If an individual tree were to torch during a wildfire, treatments will space the tree crowns to a point where fire spread from one tree to the next would be virtually impossible except under the rarest conditions of sustained high winds – in excess of 55 miles per hour (EA, Chapter 3, page 42).

In addition to meeting fuels reduction objectives, project design features and mitigation measures have been incorporated to address issues for soil productivity, Threatened, Endangered, Sensitive and MIS species and their habitat, fisheries and water resources, invasive weeds, allocated old growth, cultural resources, promoting community assistance, scenery management, recreation, transportation system, air quality and other issues that were considered but found not to be affected by the project proposal because the issues didn't pertain to the project area (such as roadless areas for instance).

I believe the selected course of action (Alternative 2, with changes described herein) provides a balanced response to the purpose and need for fuels reduction treatments into the future in the Twin Skin HFRA project area, whereas the option of doing nothing at this time (the No-Action Alternative 1) will continue to jeopardize neighboring homes and associated utilities and evacuation routes in event of wildfire in this area.

Public Involvement and Collaboration

This project transitioned from the analysis and decision process of two categorically excluded projects under 36 CFR 215 NEPA procedures to an Environmental Assessment under the Healthy Forests Restoration Act NEPA procedures described in 36 CFR 218.

Section 104(e) of the HFRA requires agencies to provide notice of the project and conduct a public meeting when preparing authorized hazardous fuels reduction projects. Section 104(f) encourages meaningful public participation during preparation of such projects.

On January 31, 2007, Boundary County Commissioner Dan Dinning facilitated an initial collaborative meeting for the Twin Skin project area. Invited attendees included the president of the Skin Creek Water Association, a representative from the Kootenai Tribe, the mayor of Moyie Springs, the Bonners Ferry City Engineer, the Bonners Ferry USFS District Ranger and two other district personnel.

The purpose of the meeting was to discuss the merits of conducting fuels reduction projects within areas that could affect the Skin Creek Water Associations water supply as well as the city of Moyie Springs (i.e. power from Moyie Dam). All attendees agreed that there was a

need to reduce hazardous fuels within the areas that could adversely affect the community water supply as well as destroy homes and block evacuation routes if the fuels were ignited. At the close of this meeting, then District Ranger Mike Herrin decided to schedule a public open house in order to form a collaborative group that would help develop a proposed action for the project.

On March 8, 2007 a public open house was held at the Bonners Ferry Ranger District. Over 100 invitations to attend the meeting were mailed out to adjacent landowners, other individuals, government entities, agencies and organizations. The purpose of this meeting was to build on the previous collaborative meeting and open it up to any and all stakeholders who wanted to be informed about the Twin Skin HFRA project. Eighteen people attended the meeting. Participants represented the Idaho Department of Lands, the Idaho Conservation League, Riley Creek Lumber Co., Vaagen Brothers Lumber Co., Fodge Pulp, Inc., Northern Lights Utility CoOp., Congressman Bill Sali's representative and several Bonners Ferry RD personnel, including Acting District Ranger Don Gunter, the project leader and other interdisciplinary members from the district.

The general purpose of this group meeting was to start the process of transitioning the Moyie Mine and Porkchop Hazardous Fuels Catagorical Exclusions to a "new" Twin Skin HFRA EA project and proceed with further development of a proposed action for the new project. The group agreed that the next meeting should involve a field trip to better acquaint people with the project area and project needs and to further discuss and develop a proposed action for the project. The group agreed on the date of May 9th, 2007 to visit the Twin Skin HFRA project area.

Invitations announcing the May 9th field trip were mailed out to the collaborative group that was formed at the March 8th open house. The group included 27 people representing adjacent land owners, government entities, agencies, utilities, forest products businesses and organizations. A news release was also published in the local Bonners Ferry Herald that invited all interested people to attend. Eleven people attended the field trip. Participants represented Boundary County FireSafe, Riley Creek, the Idaho Conservation League, Forest Interface Solutions/Envio Energi (a FireSafe contractor and biomass industry company), and Forest Service personnel, including in-coming Ranger Linda McFaddan, a sales administrator, the project leader and other interdisciplinary team members.

The field trip focused discussions on historic conditions of dry-sites and potential treatment methods and post-harvest fuels reduction activities to include underburning, as well as to proceed with the previously proposed treatments from when this project was two separate categorical exclusions, possibly with some minor modifications. However, some group members were unsure if silvicultural treatments that included regeneration harvesting were necessary and wanted to explore the idea of doing thinning only or prescribed fire only without first mechanically treating the stands and expanding the use of prescribed fire across the project area.

A scoping letter was then mailed out on September 11, 2007 to 117 individuals, organizations and agencies to gather comments for the proposed action. The comment period ended October 12, 2007, although comments could still be received and considered up to the date of issuing this EA for 30-day comments. A legal announcement for this scoping notice was also published in the Coeur d'Alene Press on September 12, 2007.

Eleven comments were received during the scoping period.

The Twin Skin HFRA EA was posted on the IPNF Quarterly Schedule of Proposed Actions (SOPA) initially in the April 13, 2007 and all subsequent SOPAs.

The EA was finalized and released for a 30-day objection period on March 10, 2008. One objection was received on April 7, 2008 by the Idaho Conservation League. An objection resolution meeting and conference call was scheduled for April 25, 2008. However, the District Ranger and a representative from the ICL discussed the objection issues over the telephone on April 21, 2008 and both parties agreed at that time that the conference call scheduled for April 25th would not be necessary. Some resolutions were agreed upon and incorporated into my decision described in this Decision Notice while others remained unresolved and the objections were reviewed by Kathleen A. McAllister, Reviewing Officer, USDA Northern Region.

In her March 28, 2008 disposition letter to the objectors, Reviewing Officer Kathleen A. McAllister found that the project clearly demonstrates compliance with the HFRA. Other findings for the Responsible Official disclosed in the review letter included:

Objection Issue 1 – future salvage was resolved by dropping this connected action.

Objection Issue 2 – noxious weeds treatments were resolved by dropping the use of herbicides in the project area until a new weed treatment EIS is completed for the District, including the Twin Skin HFRA project area.

Objection Issue 3 – the issue relating to roads analysis deficiencies was considered resolved because the project file contains notes from a roads analysis meeting, as well as a final RAP analysis document.

Objection Issue 4 – the analysis of the impacts on Grizzly Bears, specifically as it relates to roads, road densities, vehicle access and security was found to be adequately addressed in the Wildlife Biological Assessment, Biological Evaluation and project file.

Objection Issue 5 – the issue relating to the failure of the project file to contain a response to comments was considered resolved because the project file contains a content analysis table which summarized all responses and identifies where each was addressed in either the EA or project file.

Objection Issue 6 – the issue regarding the failure to disclose the increased risk of untreated activity fuels from precommercial thinning on 22 acres was considered resolved because the activity was recently accomplished under a previous NEPA decision and is no longer applicable for this project. The activity is not included in this decision.

Objection Issue 7 – the issue of a failure to consider an alternative that included the application of more prescribed fire was considered resolved because in accordance with HFRA Section 104(d)(2) only one action alternative was required to be studied, developed and described in the Environmental Analysis. In addition, a form of prescribed fire, either pile burning or underburning, will be implemented across the treatment area.

Objection Issue 8 – the issue on inadequate cumulative effects analysis based on the issues raised in the objection letter was considered resolved because the reviewing officer reviewed the EA and project file and found the cumulative effects analysis to be complete.

Objection Issue 9 – the issue of effects of project activities on soils in units where slopes exceed 80% was considered resolved because project design which includes restricting the use of machinery in these area will minimize detrimental soil disturbance to levels below the Regional Soil Quality Standards of 15%.

This last issue (Objection Issue 9) was not identified in the objection letter, but brought up during the objection issue discussion that took place between the District Ranger and the ICL on April 21, 2008.

In a letter to the ICL in response to their objection, The Reviewing Officer concluded that the Twin Skin HFRA project was in compliance with laws and regulations, and clearly demonstrated consistency with the HFRA, including use of a Community Wildfire Protection Plan. In closing the letter to the ICL, The Reviewing Officer disclosed that the project was not subject to further administrative review and that the Responsible Official may proceed with issuing a Decision Notice.

Findings and Consistency with Laws, Regulations and Policies

National Forest Management Act: Alternative 2 (with changes described herein) is also consistent with NFMA consistency requirements:

- 1) *Maintaining diversity:* Alternative 2 (with changes described herein) is designed to be implemented in a manner that will protect wildlife and fisheries resources in the Twin Skin HFRA project area (EA, Appendix B). There will be no significant impact to any species, and no loss of viability to populations or species. The long-term benefits will outweigh the short-term disturbance to species during project activities.
- 2) *Suitability for timber production (16 USC 1605[k]):* Harvest will not occur on sites identified as not suitable for timber production.
- 3) *Soil, slope or other watershed conditions (16 USC 1605[g][3][E][i] and protection for streams and other bodies of water (16 USC 1604[g][3][E][iii]):* The design of fuels reduction treatments and road work include features designed specifically to protect water, soils, and fisheries, including criteria for road maintenance (reconditioning and some reconstruction). There will be no irreversible damage to soil, slope, or other watershed conditions. Implementation will be based on use of Best Management Practices and design features to protect wetlands, seeps, bogs, wallows and springs. Fuels reduction treatments are not likely to seriously and adversely affect water conditions or fish habitat.
- 4) *Restocking (16 USC 1605[g][3][E][ii]):* Technology and knowledge exists to ensure that lands are adequately restocked within five years after final harvest. Effects on residual trees and adjacent stands have been considered.

- 5) *Economic factors (16 USC 1605[g][3][E][iv]):* Economic factors were considered and a full Economics Analysis was conducted for the Twin Skin HFRA project. Alternative 2 (with changes described herein) has economic value associated with timber volume. Regardless, Alternative 2 (with changes described herein) was chosen primarily for the reasons documented in this decision (reducing fuels and trending towards vegetative conditions more resilient to fire) and not because of economic value.
- 6) *Clearcutting and even-aged management (16 USC 1605[g][3][F]):* Even-aged management would occur on approximately 50 acres (Units 4, 5 and 15 – shelterwood harvest) under Alternative 2 (with changes described herein). All treatments are silviculturally appropriate and are within the timber and vegetation practices outlined in the Forest Plan. Under Alternative 2 (with changes described herein), no units will exceed the 40-acre opening size. Design of treatments included features to protect water, soils, and fisheries.
- 7) *Temporary roadways (16 USC 1608[b]) and standards of roadway construction (16 USC 1608[c]):* NFMA requires that the necessity of roads be documented and that road construction be designed to standards appropriate for the intended uses, considering safety, cost of transportation, and impacts on land and resources (16 USC 1608). NFMA also requires that roads are planned and designed to re-establish vegetation cover on the disturbed areas within a reasonable period of time, not to exceed 10 years unless the road is determined necessary as a permanent addition to the National Forest Transportation System (16 USC 1604, Sec. 8).

The Roads Analysis Process (RAP) was used to identify the condition of (and recommendations for) each road system in the project area. Under Alternative 2 (with changes described herein), no new system roads will be constructed in the Twin Skin HFRA project area. Up to one and one-half mile of temporary roads will be constructed to allow access to harvest Units 2 and 10. The construction will be completed using Best Management Practices to protect aquatic and soil resources (EA Appendix B and project file document titled *Road_field_report.pdf*). At the completion of its intended use, the temporary roads will be decommissioned and revegetated with native plants. A final RAP document was completed and is part of the project file titled *Twin Skin HFRA Roads Analysis.pdf*. The document includes recommendations for road maintenance as described throughout this decision document. Potential impacts of Alternative 2 (with changes described herein) from the temporary roads, road reconstruction and reconditioning have been assessed and are disclosed in the Environmental Assessment (existing and temporary roads that will be used are displayed in the Map Appendix of the EA – Maps 1 and 2 on pages 50 and 51) with supporting information in the project file.

IPNF (1987) Forest Plan: The activities planned in the Twin Skin HFRA project area are consistent with the Forest Plan because they will help to reduce the risk of uncharacteristic fire and associated risks to life, property, and natural resources; and increase safety for fire suppression crews in the case of a future wildfire. All management activities will be in compliance with Management Area direction (EA page 8), including all goals and objectives, as described in the Specialists' Reports. All treatments are silviculturally appropriate and are within the timber and vegetation practices outlined in the Forest Plan.

Forest Plan old-growth standards will be met or exceeded. Proposed activities would also meet the Forest Plan and objectives for managing snag habitat because treatments will increase the future availability of large diameter snags, while maintaining a diversity of snag structural classes on treated sites (see design features). Standards for old-growth habitat management are to maintain at least 10 percent of the forested portion of the IPNF as old growth, maintain at least 5 percent of the forested portion of those old-growth management units (OGMUs) that have 5 percent or more existing old growth, and one or more old-growth stands per OGMU should be 300 acres or larger.

The project area overlaps portions of OGMUs 24 (9,134 acres), 29 (16,979 acres) and 31 (16,970 acres) of which 14.9%, 6.0%, and 3.7% respectively are old growth (see project file OGMU map). OGMUs 24 and 29 each have one contiguous old-growth patch >300 acres. Currently, an estimated 11.8 percent of forested lands on the IPNF (FIA data: 90 percent confidence interval of 9.5 to 14.0 percent; 2004 IPNF Forest Plan Monitoring report) and 15.9 percent of forested areas in the Bonners Ferry/Kootenai Geographic Area (90 percent confidence interval of 10.2 to 21.9 percent) meet old growth criteria. The proposed action would not affect allocated old growth – there are two old growth stands in the project area (totaling 68 acres), both of which are outside of treatment areas. All allocated stands would continue to be managed for old-growth characteristics.

Because this proposal would not trend any sensitive wildlife species toward Federal listing, Alternative 2 (with changes described herein) is consistent with National Forest Management Act (NFMA) requirements to provide a diversity of plant and animal communities in the Plan area (16 USC, 1604, 6(g)(2)(B))(EA Appendix B, Wildlife BE).

Healthy Forests Restoration Act: Activities meet the requirements for authorization under the Healthy Forests Restoration Act, including:

Section 102 (a) describes locations on Federal land where hazardous fuel reduction projects are appropriate (for example, wildland-urban interface areas; condition class 2 and 3, lands where wildfire would have adverse effects on a municipal water supply or the maintenance of the system; where there is windthrow or blowdown, ice storm damage, epidemic disease or insects on or adjacent to federal land; or on federal land with threatened and endangered species habitat that is at risk to catastrophic wildfire).

Currently, the project area is categorized as being in a condition class 2 and project activities would trend the area toward an improved condition class (EA Chapter 3 and Appendix A). The entire Twin Skin HFRA project area is located within the Wildland Urban Interface as defined by the Boundary County Fire Mitigation Plan. The project proposal concurrently addresses identified hazards and vulnerabilities described in the Boundary County Wildland/Urban Interface Fire Mitigation Plan (CWPP). The County Plan was developed in 2003 (amended February 2004) through a collaborative process between Boundary County citizens, federal, state and local agencies, non-profit organizations, and the private sector. The group formed several goals to begin mitigation of fire hazard within the wildland/urban interface. These goals include fuels modification treatments within two miles of homes and associated infrastructure, including roads, in order to protect humans, their habitations and evacuation routes.

Section 102 (b) requires that proposed HFRA actions be consistent with applicable resource management plans and must be on lands managed by the USDA Forest Service or DOI BLM.

All lands within the project area boundary are National Forest System lands managed by the Bonners Ferry Ranger District of the Idaho Panhandle National Forests (IPNF).

Section 102 (d) specifies that hazardous-fuel treatment projects cannot take place in wilderness or wilderness study areas, or in areas where removal of vegetation is prohibited by an act of Congress or Presidential proclamation.

There are no lands in or adjacent to the Twin Skin HFRA project area designated as wilderness or wilderness study areas. Proposed activities are not in any area where removal of vegetation is prohibited.

Section 102 (e) requires that an authorized project fully maintain or contribute toward the restoration of the structure and composition of old growth stands.

The treatment areas do not contain any allocated, unallocated or any timber stands that meet the Green and others (corrected 2005) criteria for old growth (EA Appendix B; Page 154-155).

Section 102 (f) requires that an authorized project focus largely on small-diameter trees, thinning, strategic fuel breaks, and prescribed fire; maximizing the retention of large trees.

The analysis supports compliance with requirements for large tree retention outside of old-growth stands as appropriate for the forest types addressed and the promotion of fire-resilient stands. The intent of the treatments is to leave the largest and best trees on site, while meeting the purpose of the project to reduce fuels and increase seral species such as western larch and western white pine, as well as ponderosa pine. Prescribed fire, either pile burning or underburning will occur following harvest in all units. In addition, the project will promote the utilization of biomass.

The project meets the intent of HFRA to “maximize the retention of large trees, as appropriate for the forest type, to the extent that the trees promote fire-resilient stands.”

Table DN-3 displays the average diameter of trees initially, to be cut, and to be retained following treatment, by Unit number. The table clearly discloses that the largest trees will be retained.

Table DN-3. Average Diameter of Trees (inches): Current(i); to be Cut(c) and; Retained after treatment (r), by Unit. Units 11 and 13A not included because no merchantable timber will be cut.

Unit	DBH (i)	DBH (c)	DBH (r)
1	14.7	10.7	18.3
2	14.4	12.0	16.9
3	14.4	10.2	18.9
4	14.1	11.6	18.5

Unit	DBH (i)	DBH (c)	DBH (r)
5	14.1	11.6	18.5
6	14.8	10.3	19.4
7	16.8	9.6	21.6
8	14.7	10.7	18.3
9	16.6	12.7	20.0
9A	18.9	13.2	22.3
10	15.9	11.1	21.0
12	15.8	7.2	21.0
13	15.8	7.2	21.0
14	13.1	9.6	14.8
15	15.0	13.1	18.8
16	11.6	8.5	13.6
17	11.9	10.6	12.6
18	11.7	9.1	13.2

Section 104 (c) and (d) address consideration of alternatives, particularly for projects in the wildland-urban interface.

The Twin Skin HFRA project is located entirely within 1.5 miles of Moyie Springs, Idaho and the Wildland Urban Interface as defined by the Boundary County Fire Mitigation Plan (CWPP). The Skin Creek water association infrastructure, several homes and outbuildings, main travel routes including Highway 2, the old highway and Deer Creek road, as well as telephone, power and other service lines, are within or directly adjacent to the project area. In addition, approximately 32 percent of the 4,600 acre project area is privately owned.

As defined in Section 101 (1)(A)(ii) of HFRA, an “at-risk community” is defined as “a group of homes and other structures with basic infrastructure and services (such as utilities and collectively maintained transportation routes) within or adjacent to Federal land;”

Section 101 (1)(B) and (C)

“in which conditions are conducive to a large-scale wildland fire disturbance event; and for which a significant threat to human life or property exists as a result of a wildland fire disturbance event.”

The treatments proposed in the Twin Skin HFRA project implement an acceptable version of the Wildland Urban Interface Fire Mitigation Plan recommendations. Under HFRA authorities, in order to expedite analyses, proposed projects inside a wildland-urban interface and within 1.5 miles of the boundary of an at-risk community do not require an alternative to the proposed action as long as it meets objectives in a CWPP. However, a no action alternative was included in order to display the effects associated with not implementing the project. Alternative 1 is the No-Action Alternative (to demonstrate the effects of failing to implement the project), Alternative 2 is the Proposed Action Alternative (the agency’s proposed alternative). This decision is based on Alternative 2 (with changes described herein), as described previously in this Decision Notice.

Section 104 (e), (f) and (g) encourage meaningful public participation, including collaboration and public comment. Agencies must provide notice of the project and conduct a public meeting when preparing authorized hazardous fuel-reduction projects.

A collaborative process was used and has been fully disclosed starting on page 19 of this Decision Notice.

Clean Water Act: Alternative 2 (with changes described herein) is consistent with the requirements of the Clean Water Act (33 USC 1251).

Sediment and water temperature, the pollutants of concern, will not permanently increase in the waters of the Twin Skin HFRA Project. These pollutants to water quality will be prevented through implementation of BMPs and Forest Plan Standards and Guidelines. The riparian protection components of the project (INFS RMOs, Forest Service BMPs) are designed to improve condition. Risks to beneficial uses will not be changed by this project. There will be no detrimental increase in sediment or stream temperature through management activities in the Twin Skin Project Area.

By following site specific BMPs, INFS guidelines, and RHCA buffers, there will be no direct, indirect or cumulative effects on fish habitat and the hydrologist determined the project would be very unlikely to produce negative effects through sedimentation, increased stream temperatures, changes in water yield, or decreased amounts of large wood for stream channel stability, thus no violation to the TMDL regulations or Clean Water Act (EA Appendix B, hydrologist report).

Clean Air Act: The Clean Air Act was designed to “protect and enhance” the quality of the nation’s air resources. The Act encourages reasonable Federal, State and local government actions for pollution prevention. State Implementation Plans (SIPs) are developed by each state to implement the provisions of the CAA. The SIPs describe the State’s actions to achieve and maintain the “national ambient air quality standards” for specific pollutants such as particulate matter. Boundary County is part of Airshed 11 which has no areas of concern, Class 1 airsheds and is in attainment of air quality standards.

The Idaho Panhandle National Forests are members of the Montana/Idaho Airshed Group – the coordinated operations of this group being critical in accomplishing land management objectives while minimizing cumulative impacts of smoke from prescribed fire activities conducted by its members. Members of the Airshed Group enter all the burns they would like to accomplish for that calendar year during the pre-season within an internet based reporting system. During the burn season, members propose burns for the subsequent day and then the monitoring unit (along with the Idaho Department of Environmental Quality) considers all the proposed burns along with expected dispersion and ventilation and existing air quality to determine burn recommendations. These procedures limit smoke accumulations to legal, acceptable limits. The Bonners Ferry Ranger District strictly complies with these procedures. Although prescribed fire creates smoke containing particulate matter, activities associated with Alternative 2 will reduce the particulate matter of potential wildfires (Fire and Fuels Report – EA Appendix A).

National Historic Preservation Act: Surveys to locate heritage resources within the Twin Skin HFRA project area have been completed (EA Appendix B, Cultural Resources report). All known heritage resource sites would be protected under either alternative. Any future

discovery of heritage resource sites would be inventoried and protected in accordance with the National Historic Preservation Act if found to be of cultural significance.

Endangered Species Act: Section 7 of the Endangered Species Act directs that actions authorized, funded, or carried out by federal agencies do not jeopardize the continued existence of any Threatened or Endangered species, or result in adverse modification of habitat critical to these species. Alternative 2 (with changes described herein) will be in compliance with the Endangered Species Act as amended (EA Appendix B, Wildlife, Fisheries and Botany reports).

Migratory Bird Treaty Act: The wildlife report for this project determined that Alternative 2 (with changes described herein), "May impact individuals and habitat, but would not indicate a local or regional change in habitat quality or population status" (EA Appendix B, wildlife Biological Evaluation).

Safe Drinking Water Act and Amendments of 1996 (Including State of Idaho Implementation): Alternative 2 (with changes described herein) is consistent with the requirements of the Safe Drinking Water Act and Amendments of 1996. BMP's were developed from protection measures recommended from this assessment along with site specific BMP's outlined in EA Appendix B, hydrology report.

Idaho Forest Practices Act: One municipal watershed is within the project area boundary. Adjacent landowners to the project area draw their water from the Skin Creek Water Association system, the intake of which is just south of Unit 18, or from private water wells. Proposed activities are away from water sources used for domestic purposes. BMPs or Soil and Water Conservation Practices (EA Appendix B, hydrology report) will be applied under Alternative 2 (with changes described herein), and all activities are in compliance with the guidelines in the Soil and Water Conservation Handbook.

Executive Order 12962 – Recreational Fishing: The goal of EO 12962 is to protect and improve recreational fishery resources. Alternative 2 (with changes described herein) would not impact recreational fisheries in any way, therefore it is consistent with EO12962 (Appendix B – Fisheries Report).

State of Idaho Governor's Bull Trout Plan: There are no bull trout populations or habitat within the analysis area and according to the analysis, existing fisheries habitat overall would not be impacted. Therefore, Alternative 2 (with changes described herein) is consistent with the direction in the Governor's Bull Trout Plan (EA, Appendix B, Fisheries Report).

Roadless Area Conservation Rule, Interim Directives No. 7710-2001-2 and No. 2400-2001-3, and Wilderness Act of 1964: Activities under Alternative 2 (with changes described herein) are consistent with these mandates. There are no roadless or wilderness areas within or adjacent to the Twin Skin HFRA project area.

Environmental Justice Act: Alternative 2 (with changes described herein) was assessed to determine whether it would disproportionately impact minority or low-income populations, in accordance with Executive Order 12898. No impacts to minority or low-income populations were identified during scoping or any other portion of public involvement during the course of

this analysis. Based on this, Alternative 2 (with changes described herein) complies with Executive Order 12898.

Best Available Science: The need to employ the best science is not new, since agency decisions have always required a sound technical basis. What constitutes best available science might vary over time and across scientific disciplines. The Twin Skin HFRA project, including the EA, Appendices which include resource specialist reports, and the project file, demonstrates a thorough review of relevant scientific information, a consideration of responsible opposing views, and the acknowledgement of incomplete or unavailable information, scientific uncertainty and risk, as appropriate.

DRAFT

Finding of No Significant Impact (FONSI)

The Forest Service has two types of decisions: programmatic (such as the Forest Plan) and project level (which implements the Forest Plan). The Twin Skin HFRA Environmental Assessment is a project-level analysis; its scope is confined to addressing the significant issues and environmental effects of the project. Two alternatives were considered in detail - the No-Action Alternative and the Proposed Action Alternative. The No-Action Alternative represents the current (i.e. baseline) and expected future condition given the past, ongoing and reasonably foreseeable activities (EA page 24 summary and Appendices). The Proposed Action Alternative represents the expected future condition based on the effects of fuels reduction, and associated activities under the Forest Service's Proposed Action as well as past, ongoing and reasonably foreseeable activities (EA page 24 summary and Appendices).

After considering the environmental effects described in the Twin Skin HFRA Environmental Assessment (EA), I have determined that Alternative 2 (with changes described herein) will not have a significant effect on the quality of the human environment based on the context and intensity of its impacts (40 CFR 1508.27). Therefore, an environmental impact statement will not be prepared. I base my finding on the following disclosures:

A. Context

The significance of an action must be analyzed in several contexts, such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than the world as a whole. Both short- and long-term effects are relevant (40 CFR 1508.27).

The project area is set in a forested Wildland Urban Interface (WUI) environment predominantly in the Lower Moyie River watershed of the Bonners Ferry Ranger District – the proposed treatment areas are surrounded by year-round residences. There is limited dispersed recreation (i.e. hunting, ATV riding and firewood cutting) and timber harvest activities (past and on-going) on both federal and private lands.

Expectations are that the project will be implemented over a six to ten-year period with harvesting operations occurring during all seasons of each year with the exception of Units 12 and 13 which would be limited to winter operations and Units 16, 17 and 18 where operations will not be permitted from April 1 through August 15 of any year due to their proximity to recent wolf sightings. Adjacent landowners, other local and Idaho residents and some nonresidents who choose to hunt or otherwise recreate in the area will be most affected. The context of this proposal is minimal, with direct implications only for an area of approximately 670 acres (713 acres were analyzed for treatment for the EA), although some analyses (such as aquatics and wildlife) considered the extent of effects beyond the treatment and project area boundaries. While reducing hazardous fuels, the proposed action would not pose any significant short- or long-term effects. Design features included in this proposal would limit adverse effects to such an extent that any adverse impacts are almost undetectable and immeasurable, even at the local level (discussed in EA Chapter 3, the Specialists' Reports located in EA Appendices A and B, and the EA Errata Sheets).

The Twin Skin HFRA project will achieve planned activities within the project area for the foreseeable future.

B. Intensity

This refers to the severity of the impact. The following are considered in evaluating intensity (40 CFR 1508.27):

1. Impacts may be both beneficial and adverse. A significant effect may exist even if, on balance, effects are believed to be beneficial.

Beneficial and adverse impacts of this decision are addressed in Chapter 3 of the EA and EA Appendices A and B. No significant impacts were identified.

2. The degree of effects on public health or safety.

Safety measures have been incorporated into the project design to provide for public safety during treatment operations. In the event of a wildfire, the treatments would reduce fire intensities to help allow safe travel along the ingress/egress travel corridors. The risk of smoke intrusion into this Class II airshed from prescribed burning in the Twin Skin HFRA project area would be minimal due to prevailing winds and the amount of smoke that would be produced at any one time (EA Chapter 3 and Appendix A). All burning complies with federal, state and local regulations (EA Chapter 3 and Appendix A). Management practices include but are not limited to burning under spring-like conditions (high fuel, soil, and duff moistures) to reduce emissions and provide for retention of large woody debris. Prescribed burning during spring or fall will generate less particulate matter from smoke than would occur during a more intense summertime wildfire that would consume the currently heavy fuel load (EA Chapter 3 and Appendix A). Also, this project includes a focus for improving utilization of biomass that is a by-product of fuels reduction treatments and that have traditionally been piled and burned. Biomass removed from the project area and used for energy (electricity, ethanol or biodiesel for instance) will have the added benefit of reducing smoke emissions in the project area that would otherwise result from burning the excess slash.

Logging operation restrictions and road maintenance work as described in the project's design features on Section 2.4, pages 19-23 of the EA will be employed as additional safety features. The selected action is expected to maintain watershed conditions and water quality such that downstream beneficial uses are protected and compliance with state water quality standards is achieved.

Reduction of fuels and lower hazard conditions for intense or stand-replacing wildfire will help ensure public and firefighter safety.

For these reasons, there will be no significant effects on public health and safety.

3. Unique characteristics of the geographic area such as proximity to historic or cultural resources, parklands, prime farmlands, wetlands, wild and scenic rivers or ecologically critical areas.

No parklands, prime farmlands, wild and scenic rivers or ecologically critical areas would be affected by any of the proposed treatments. The resource area has been surveyed and analyzed for historic and cultural resources; results indicate that Alternative 2 (with changes described herein) will have *No Adverse Effects* because the project has been designed to avoid significant effects to components/features associated with Class I and II properties (EA Appendix B, Cultural Resource report). With regard to wetlands, the proposed action would exclude all Riparian Habitat Conservation Areas (RHCAs) from proposed treatment areas, consistent with Forest Plan guidelines (EA Appendix B, Hydrologist report) as amended by the Inland Native Fish Strategy, and state and federal law. These design features will reduce riparian impacts to the extent that the

Proposed Action would not pose any significant impacts to wetlands or riparian areas within the Twin Skin HFRA project area.

4. The degree to which the effects on the quality of the human environmental are likely to be highly controversial.

CEQ guidelines suggest that an EIS should be prepared where the impacts are controversial, referring not to the amount of public opposition, but to where there is a substantial dispute as to the size, nature, or effect of the major federal action (http://ceq.eh.doe.gov/nepa/caselaw/Major_NEPA_Cases.pdf pp 7, IIIA(2)).

Review of public input, of the potential issues raised during scoping and during development of the proposed action through collaborative meetings and field trips, and the standards, guidelines and design features related to the proposed action have resulted in a limited and focused proposed action. The expected effects of the activities in the Twin Skin HFRA project area on the quality of the human environment have not resulted in any substantial disputes as to the size, nature or effects of this proposed action.

5. The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.

Due to past similar activities on the Idaho Panhandle National Forests, the effects on the human environment are well understood. Chapter 3 of the EA discloses the existing condition of the area as well as the direct, indirect and cumulative effects of Alternative 2 (with changes described herein). Those effects do not indicate uncertain, unique or unknown risks, nor do resource technical reports, Biological Assessments/Evaluations contained in EA Appendices A or B and EA Errata Sheets. Monitoring of past activities and projects has confirmed the predicted effects analysis. Documentation of past monitoring with similar projects can be found in the IPNFs' annual monitoring reports at:

(<http://www.fs.fed.us/ipnf/eco/manage/forestplan/index.html#fpmon>)

Alternative 2 (with changes described herein) is consistent with management direction provided by the Forest Plan. Design features would minimize the potential impacts. There are no impacts that might be uncertain, unique or unknown.

6. The degree to which the action may establish precedent for future actions with significant effects or represents a decision in principle about a future consideration.

Alternative 2 (with changes described herein) is within general and specific management area guidelines and direction in the Forest Plan and does not set any unusual or binding precedent for future actions, nor is it directly part of a larger connected action.

7. The degree of cumulative effects on resources.

The Affected Environment in Chapter 3 and EA Appendices A and B discloses the existing condition including past actions. Direct, indirect, and cumulative effects of implementation of alternatives on the affected environment as well as planned and reasonably foreseeable actions are disclosed in Chapter 3 of the EA, Appendices, and EA Errata Sheets. No cumulatively significant effects were noted. Additionally, the Biological Assessments and Evaluations for fish, wildlife and plants conclude that Alternative 2 (with changes described herein) will have no adverse cumulative effects or impacts upon threatened, endangered, proposed, or sensitive species, nor do resource technical reports in the project record indicate that implementation of the selected alternative will

result in significant effects to natural resources or the quality of the human environment.

8. The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural or historical resources.

A record search, field survey, and resource inventory Heritage Resource Report have been completed for this project in compliance with Section 106 of the Historic Preservation Act (EA Appendix B, Cultural Resource report). Assessment of historic and cultural resources in the Twin Skin HFRA project area indicates implementation of this project would have *No Adverse Effect* on any heritage resource eligible for listing in the National Register of historic places, nor would it cause loss or destruction of any significant cultural or historical resources. If any new heritage resources are discovered during project implementation, operations would cease in the area of discovery until adequate protection measures had been agreed upon with the State Historic Preservation Office (SHPO).

9. The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act (ESA) of 1973.

The Selected Alternative (Alternative 2 with changes described herein) is designed to be implemented in a manner that would protect wildlife, fish, and rare plant resources in the Twin Skin HFRA project area (EA Chapter 2 and EA Appendix B). No activities are proposed in allocated old growth. There would be no significant impact to any species, and there would be no loss of viability to populations or species.

10. Whether the action threatens a violation of Federal, State or local law or requirements imposed for the protection of the environment.

National Forest Management Act (NFMA) and IPNF (1987) Forest Plan: Alternative 2 (with changes described herein) is consistent with the NFMA and other applicable federal, state and local laws that protect the environment, including the IPNF (1987) Forest Plan, as amended. Activities associated with the Twin Skin HFRA project area are consistent with the Forest Plan because they will reduce fuels and therefore future fire intensities from within the county-defined WUI contained within lands designated for such purpose. Fuels reduction activities will also help promote long-lived, fire-resilient, seral species within the project area. All management activities will be in compliance with Management Area direction, including goals and objectives, as described in the Specialists' Reports.

Forest Plan old-growth standards would be met. Old growth standard 10 (a) incorporates the definitions of old growth developed by the Regional Old Growth Task Force, documented in Green et al (1992 - errata corrected 02/2005), "Old Growth Forest Types of the Northern Region. USDA, Forest Service, Northern Region." The allocated old growth within the Twin Skin project area meets the old growth definitions included in Green et al. Alternative 2 (with changes described herein) complies with Forest Plan direction to manage old growth habitat. Standards for old-growth habitat management are to maintain at least 10 percent of the forested portion of the IPNF as old growth, maintain at least 5 percent of the forested portion of those old-growth management units (OGMUs) that have 5 percent or more existing old growth, and one or more old-growth stands per OGMU should be 300 acres or larger. The project area overlaps portions of OGMUs 24 (9,134 acres), 29 (16,979 acres) and 31 (16,970 acres) of which 14.9%, 6.0%, and 3.7% respectively are old growth (see project file OGMU map). OGMUs 24 and 29 each have one contiguous old-growth patch >300 acres. Currently, an estimated 11.8 percent of forested lands on the IPNF (FIA data: 90 percent

confidence interval of 9.5 to 14.0 percent; 2004 IPNF Forest Plan Monitoring report) and 15.9 percent of forested areas in the Bonners Ferry/Kootenai Geographic Area (90 percent confidence interval of 10.2 to 21.9 percent) meet old growth criteria. Alternative 2 will not affect allocated old growth – there will be no harvest, prescribed fire, road construction, or any other project related activity within old growth stands. All allocated stands would continue to be managed for old-growth characteristics.

NFMA consistency requirements include the need to protect species viability and habitat for Threatened, Endangered, Sensitive Species as well as habitat for Management Indicator Species and forest species of concern. Alternative 2 (with changes described herein) was designed to be implemented in a manner that would protect wildlife and fisheries resources in the Twin Skin HFRA project area (EA Appendix B, Wildlife BA/BE, Fisheries BA and EA Errata Sheets). There would be no significant impact to any species, and there would be no loss of viability to populations or species.

Technology and knowledge exists to ensure that lands are adequately restocked within five years after final harvest. Effects on residual trees and adjacent stands have been considered. Harvest will not occur on sites identified as not suitable for timber production. All treatments that would occur under the Proposed Action are silviculturally appropriate and are within the timber and vegetation practices outlined in the Forest Plan. Potential physical, biological, aesthetic, cultural, engineering and economic impacts of Alternative 2 (with changes described herein) have been assessed and are disclosed in the Environmental Assessment with supporting information in the Appendices and project file.

Clean Water Act: The Specialist's Report on Aquatic Resources (EA Appendix B) evaluated potential adverse impacts to water resource and project compliance with the Clean Water Act, and determined that the Proposed Action would be consistent with the Clean Water Act. There would be no change in risks to beneficial uses in any stream in the Twin Skin HFRA cumulative effects area.

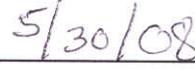
Endangered Species Act: Section 7 of the Endangered Species Act directs that actions authorized, funded, or carried out by federal agencies do not jeopardize the continued existence of any Threatened or Endangered species, or result in adverse modification of habitat critical to these species. Alternative 2 (with changes described herein) will be in compliance with the Endangered Species Act as amended (EA Appendix B, Wildlife BA and Errata Sheets).

Migratory Bird Treaty Act: The habitat needs of neotropical migrants were addressed through the analyses for other species which depend upon old forest structure and snags (goshawk, pileated woodpecker, marten, and black-backed woodpecker). Alternative 2 may impact individual forestland birds and their habitat, but would not contribute to a local or regional change in habitat quality or population status. However, the findings for taking no action were similar because of the increased hazards from wildfire (EA Appendix B, Wildlife BE). Efforts to trend stands in the resource area toward historic species composition and diversity in age structure and to maintain the ecological processes that created these conditions would result in the continuation of suitable habitat for all bird species that presently use the project area. In addition, effects are generally short term in nature, riparian and wetland habitat will be protected and treatments will maintain or improve priority habitats

Environmental Justice: In accordance with Executive Order 12898, the action alternative (Alternative 2 with changes described herein) was assessed to determine whether it would disproportionately impact minority or low-income populations. No impacts to minority or low-

income populations were identified during scoping or any other portion of public involvement during the course of this analysis. Based on this, Alternative 2 (with changes described herein) would comply with Executive Order 12898.





RANOTTA K. McNAIR

Date

Forest Supervisor

Idaho Panhandle National Forests