United States Department of Agriculture | **Forest Service** | **Mormon Lake Ranger District**

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Dear Interested Participant,

The Mormon Lake Ranger District of the Coconino National Forest is seeking comments on the Skunk Canyon Prescribed Burn Fuel Reduction project. The project area exists within the Flagstaff Wildland Urban Interface Area (WUI), and encompasses approximately 831 acres south and east of the Flagstaff water treatment plant and includes most of Section 3 and parts of Sections 2, 10, and 11 of T20N, R7E, G&SRBM, Coconino Co., AZ. The project overlays the soon to be completed Skunk Hollow Thinning Project. The project area surrounds the Skunk Hollow subdivision and several residences in Fay Canyon, and is bound to the north by the Pine Canyon Club Estates.

Purpose and Need:

The purpose of this project is to use prescribed burning treatments to continue to reduce fuel loading and overall fuel hazard initiated with the Skunk Hollow Thinning Project, within this Wildland Urban Interface (WUI). The Skunk Hollow Thinning Project Decision did not include prescribed burning as a method to further reduce fuels across the entire area. As a result, the Skunk Canyon Prescribed Burn Project is being proposed to add this activity. Timing the prescribed burning treatment to closely coincide with completion of the thinning, piling and pile burning accomplished with the Skunk Hollow project is a desired goal of this proposal. The Skunk Canyon Prescribed Burn project specifically will continue to reduce wildfire potential adjacent to those private properties described above and reintroduce low-intensity ground fire (an important ecosystem process) to prevent forest litter build-up.

Project Background

In November of 1997, District Ranger Bruce Greco signed a decision for the Skunk Hollow Thinning Project to allow thinning and activity slash treatments in this area. Thinning included removal of selected trees less than 9.0” diameter breast height (dbh), piling of thinning slash, and burning of slash piles. Thinning has been completed, and piling of the remaining 100 acres of the project will be completed in 2005. The last of those piles should be burned over the winter of 2005/2006.

While we have been implementing the Skunk Hollow Thinning Project, other important steps have been taken to emphasize protecting communities at risk including the Healthy Forest Initiative and Healthy Forest Restoration Act. As these policies, acts and partnerships have

developed the element of restoration has also been developing. Currently the "Central Priority" of the Southwestern Region is "Restoring the Ecological Functionality of Fire Adapted Ecosystems." While the Skunk Hollow Thinning has made great gains in achieving the objectives of wildfire behavior and risk reduction in the WUI, the inclusion of prescribed fire will do even more to meet overall restoration and risk reduction objectives.

Project Description

With the completion of thinning and associated treatment of activity slash through pile burning the area is in prime condition to implement prescribed fire in a broadcast burn. The amount of fuel in the project area's forest floor ranges from 3 to11 tons per acre. Without recurring prescribed burns, forest litter accumulations would eventually exceed five tons/acre, which would be considered hazardous levels. Where it is concentrated, the fuel inhibits the diversity and abundance of forest floor vegetation. This project proposes to further reduce the area fire hazard by conducting prescribed burns across the forest floor over the 831 acres using and including the following processes:

- Initially, using qualified fire personnel, a low-intensity prescribed groundfire will be carried across the project area in 50 to 200 acre burn blocks. Burns would be conducted to consume excess amounts of small size fuels reducing the fuel load to 3 to 5 tons per acre.

- Since the area has missed several natural fire cycles some trees throughout have unnaturally low crown height. Even a low intensity burn will kill back these lower limbs and where the canopy closure does not allow sufficient heat dispersal some weaker trees may be killed. The red needles from this effect will be visible for one to two years after burning.

- Fire behavior modeling indicates that controlling the prescribed burns will not be a problem. Burn prescriptions will be developed to minimize smoke impacts. Burn day execution will be coordinated with Arizona Department of Environmental Quality, Flagstaff Fire Department, and agencies that may be burning to avoid excessive smoke accumulations. Usual media notification will alert most affected parties. Neighborhoods adjacent to the project area will receive information, informing them of the impending burn within the week prior to ignition.

- We expect to take 5 or 6 years to complete the initial prescribed burning with up to 10 days of burning occurring each year. This would restore the area to the naturally light forest floor fuel loading that existed historically.

- To maintain this low hazard fuel loading, successive maintenance prescribed burns would be conducted every 4 to 9 years. Maintenance burns might encompass up to 400-acre blocks occurring only two days a year. These maintenance burns would generate low smoke impacts due to the lighter fuel accumulations.

- Burning may be conducted in any season of the year provided the burn is conducted within weather and fuel conditions prescribed by the burn plan or as indicated under Design Features for specific habitats. Burning will not be conducted on excessively windy days, but only when risk of escape is insignificant. It is expected that perimeter blocks would be burned in the fall and interior blocks would be burned in the spring.

- All potential habitat for sensitive plants has been surveyed. No populations of *Penstemon nudiflorus*, Flagstaff beardtongue, were located. Numerous populations of *Hedeoma diffusum*, Flagstaff pennyroyal, are present within the project area. This species typically responds well to light and moderate intensity burning. All populations have been marked and will be monitored one year post-burn to evaluate burn effects on Hedeoma survival and to evaluate invasive weed spread in Hedeoma habitat that could occur in relation to the burning.

- Forest Service listed sensitive wildlife and plant species have been evaluated. There will be no adverse impacts to listed species.

Design Features

The following actions will be undertaken during the implementation of this project in order to protect a variety of resource values.

- After survey of the project area only Class B and Class C invasive species were found, including cheat grass, Dalmatian toadflax, and common mullein. Class B invasive species include invasive weeds that are non-native (exotic) species that are of limited distribution or are unrecorded in a region of the state, but are common in other regions of the state. Management emphasis is to contain the spread, decrease population size and eventually eliminate the infestation when cost effective technology is available. Class C species consist of any other invasive weeds (exotic or native). Management emphasis is to contain spread to present population size or decrease population. Best Management Practices as outlined in the Three Forest Final Environmental Impact Statement for Integrated Treatment of Noxious or Invasive Weeds will be followed to incorporate weed prevention and control into the project. Considering the invasiveness, the extent of these populations, and the potential impacts of these species we will incorporate the following features into project implementation and monitoring:

    - Prevent introduction of invasive weeds by thoroughly cleaning equipment before entering the project area and cleaning equipment, clothing, and boots after use in the project area.
    - Time burns to promote native species and to hinder weed species germination. To accomplish this goal, early spring burning is preferred (before May 31) with a low to medium intensity burn. This would be the best timing to minimize Dalmatian toadflax reproduction and enhance *Hedeoma diffusum* habitat. Late fall burning is the second most preferable treatment window using a low intensity burn.

- Following implementation of the burn, surveying will occur to assess needs for release of biological control targeting Dalmatian toadflax (*Linaria dalmatica* biocontrol treatment). If surveying determines a need, treatment with the Linaria dalmatica biocontrol will consist of year zero release of insects and set up of monitoring plots, and a year one visit to monitor the establishment of the insect populations. After year one, monitoring will be maintained under the forest weed management program. If needed, this follow-up treatment activity has been cleared through the Final Environmental Impact Statement for Integrated Treatment of Noxious or Invasive Weeds (Feb 2005). Monitoring and release of biological control will follow APHIS' basic procedures for 5 years following release to establish population effects.
- Evaluating data from the 5 year *Hedeoma diffusum* study (Crisp 1997, Phillips & Crisp 2000), we predict no adverse effects to the rare plant *Hedeoma diffusum* from fire alone.

- Avoid impacts to Heritage Resources. This area has been surveyed and archaeological sites or other cultural resources will be avoided.

- Control lines will be constructed by hand or by a surface drag, but sufficient to address fire spread during ignition conditions. We do not anticipate that dozer-line will be needed. If short portions of control line require a dozer, we will pull berms back into the line and waterbar where needed for drainage control after burning.

- Avoid burning to limit activity in the PFA (post fledging-family area), between March 1 and September 30 within the Zuni northern goshawk PFA, which is a 135-acre area located in the northwest corner of the project area.

- Avoid burning between March 15 and August 31 on the 188 acres that lie less than two miles from the nearest Mexican spotted owl nest area. This will eliminate any potential effects that smoke from burning may have on birds nesting in nearby Walnut Canyon.

- Protect yellow-barked ponderosa pine trees, and logs (12"dbh and 8' in length) and snags (18"dbh and 30' in height) large enough to benefit area wildlife, where duff accumulations indicate potential loss.

- After burning each designated block, crews may fall a few trees (approximately 12 inches dbh in size), to replace logs lost during the prescribed fire to meet Forest Plan Standards and Guidelines for Northern goshawk management. This will not exceed 2 trees per acre. Portions of the area would not have any trees fallen. This would not be implemented in areas easily accessible to fire wood gathering or near homes or private property, and only in areas determined beneficial by district biologist.

- <u>Roads</u>: No new road construction will be needed. All areas are currently accessible

through existing roads.

Environmental Analysis

Based on information gathered to date, I am moving towards analyzing this project as a Categorical Exclusion. A proposed project may be categorically excluded from documentation in an Environmental Impact Statement or Environmental Assessment if it is within a category listed in Section 31.2 of Forest Service Handbook 1909.15 and there are no extraordinary circumstances related to the Proposed Action. Comments from the public and Forest Service resource specialists, along with a project analysis, will help confirm whether this project can be categorically excluded.

This project appears to be consistent with category 31.2(10): "*Hazardous fuels reduction activities using prescribed fire, not to exceed 4,500 acres…*". The project scope is limited to prescribed fire treatments and associated activities and does not include other mechanized treatments. This project will help restore the functionality of a fire-adapted ecosystem and reduce wildfire risk to private lands and wildland urban interface surrounding the Skunk Canyon area.

Findings: The following paragraphs summarize the results of our analysis to-date and support our preliminary conclusions that there are no extraordinary circumstances that could cause a significant effect on the environment and that this project therefore may be excluded from documentation in an Environmental Assessment or Environmental Impact Statement:

The Skunk Canyon Prescribed Burn Project is located on the Peaks and Mormon Lake Ranger Districts of the Coconino National Forest. The project is consistent with the Coconino Forest Plan and it's amendments.

Steep slopes or highly erosive soils: According to the Coconino National Forest Terrestrial Ecosystem survey, there are no highly erosive or excessively steep slopes within the project activity area that would constitute an extraordinary circumstance.

Federally listed threatened and endangered species or designated critical habitat: There are no adverse effects to threatened or endangered species or their critical habitat.

Flood plains, wetlands, or municipal watersheds: There are no flood plains, wetlands, or municipal watersheds within the project area.

Congressionally designated areas, such as wilderness, wilderness study areas, or National Recreation Areas: There are no congressionally designated areas such as wilderness, wilderness study areas, National Recreation areas.

Inventoried roadless areas: There are no inventoried roadless areas in the project area.

Research Natural Areas: There are no Research Natural Areas in this project area.

Native American areas of traditional cultural importance, archaeological sites, or historic properties or areas: Mitigation measures and other design features have been formulated to manage the area as a no effect to cultural resources. The subsequent analysis and archaeological clearance report, in accordance with the National Historic Preservation Act, has a finding of no effect. The Arizona State Historic Preservation Office has concurred with the determination of no effect, contingent upon the recommendations outlined in the clearance report.

Public Involvement and Collaboration:

This project was published in the Coconino National Forest *Schedule of Proposed Actions* (SOPA) starting in January 2005, which is mailed to approximately 50 individuals or groups and posted on the Coconino National Forest Internet web site at:

www.fs.fed.us/r3/coconino/publications.

Shortly after the Skunk Hollow Thinning Decision was signed, what is now known as the Greater Flagstaff Forest Partnership (GFFP) was formed to collaboratively address wildland urban interface threats from fire, and restoration in the forest surrounding the Flagstaff area. The thinning project and this proposal incorporates many collaborative elements associated with fuel risk reduction and forest restoration that we've developed with the GFFP over the years. Three GFFP projects either collaboratively developed or currently under study, are immediately adjacent to the project, including the Airport, Mountainaire, and Eastside projects. The project has been described to the GFFP and was well received.

We have also contacted with Flagstaff City Fire Department and they have expressed support for the project and a desire to work cooperatively with us through implementation.

In recent years efforts to reduce fuels and fire threat have occurred on some adjacent private lands including the Pine Canyon Club to the north and on private properties in Faye Canyon. In some instances we have been in communication with or have worked collaboratively with the private land owners on these efforts. We know there is a high interest to continue to reduce the threats on both ownerships.

We wish to continue and expand this collaboration by contacting you and asking for your comments on the project.

Comments

Please provide any comments or concerns based on the above project description by April 4, 2005. Written comments may be submitted via mail, fax, or in person to the Mormon Lake District Ranger at 4373 S. Lake Mary Road, Flagstaff, AZ 86001; FAX (928) 214-2460, or by e-mail to arbrown@fs.fed.us. Oral comments may be directed to Project Leader, Alvin Brown, at (928) 526-0866. An electronic copy of this document may be found at:

http://www.fs.fed.us/r3/coconino/nepa/index.shtml

We anticipate a decision for this project in April, 2005. If you wish to receive notification of my decision or if you have any questions about the proposal, please call or e-mail Project Team leader Alvin Brown as described above.

Sincerely,

/S/TERRI MARCERON

TERRI MARCERON
Mormon Lake District Ranger

Enclosure: Project Area Map