



File Code: 1570-1

Date: July 5, 2006

Chad Hanson
Director
John Muir Project
P.O. Box 697
Cedar Ridge, CA 95924

Dear Mr. Hanson:

This letter is in response to your objection dated June 5, 2006, to the Mill Canyon Fuels Reduction Project. The project is located on the Bridgeport Ranger District of the Humboldt-Toiyabe National Forest. Your objection was filed on behalf of the John Muir Project of Earth Island Institute and the Center for Biological Diversity.

I have read the Environmental Assessment (EA), reviewed the project file (including documents incorporated by reference), considered the comments submitted during scoping and the 30 day Notice of Proposed Action/Opportunity to Comment period, and discussed your objection with my staff. My review has been conducted in accordance with 36 CFR 218.

Healthy Forest Restoration Act (HFRA) Compliance

My review finds that the EA demonstrates compliance with HFRA.

- The purpose and need of this fuels reduction project is well substantiated in the EA and is consistent with HFRA direction to 1) conduct hazardous fuels reduction projects aimed at protecting communities and other at-risk Federal land; 2) address threats to forest health; 3) protect, restore, and enhance forest ecosystem components; 4) promote the recovery of T&E species; 5) and improve biological diversity.
- The project specifically qualifies as an “Authorized Hazardous Fuel Reduction Project” per HFRA Section 102(a)(5): it contains threatened Lahontan cutthroat trout (LCT) habitat; wildfire is a threat to the species and it’s habitat; the “threatened” listing has been published in the Federal Register; the project will provide enhanced protection from catastrophic wildfire for LCT.
- Per HFRA Section 102(B), the action Alternatives and Proposed Decision are consistent with the Forest Plan, as amended by the Sierra Nevada Forest Plan Amendment (SNFPA). SNFPA identifies the project area as a Wildland Urban Intermix Threat Zone due to its fire history, fuel conditions, weather, and topography.
- The EA appropriately addressed the proposed agency action (Alternative 2: conifer thinning and prescribed fuel treatments) and one additional action alternative (Alternative 3: prescribed fire only), as mandated in HFRA Section 104[c][1].



Concerns about Analysis/Process

The EA and Project Record credibly address site-specific resources and consequences of the two action alternatives and no action alternatives.

- Technical conifer stand analysis is supported with professionally collected data and modeling including contracted stand exams (Common Stand Examination methodology); Forest Vegetation Simulator (FVS) growth model and fire simulator; Fire Behavior Prediction and Fuel Modeling System (BEHAVE); Dead and Down Woody Inventory; “Aids to Determining Fuel Models for Estimating Fire Behavior”, Hale E. Anderson, April 1982.
- Technical stand analysis is also consistent with professional publications cited in both the EA and objection: 1) reducing stand density index (SDI), basal area (BA), and canopy in excessively dense conifer stands decreases susceptibility to stand-replacing wildfire and other mortality agents; 2) thinning should focus upon the youngest, suppressed, and small-intermediate sized trees, while generally retaining dominant, larger trees; 3) effective thinning prescriptions must address site-specific landscape conditions.
- Project design is consistent with all relevant SNFPA standards, including large tree retention (30”dbh and larger conifers); establishment and maintenance of northern goshawk Protected Activity Centers (PACs); retention of 3 of the largest snags per acre.
- Project design incorporates standard State water quality Best Management Practices associated with logging and prescribed burning.
- Species of concern (TES, MIS, migratory bird species) have been adequately analyzed; the Biological Assessment and Evaluation will more specifically address the Decision Alternative.
- Commanding Officer of the US Marine Corps Mountain Warfare Training Center has reviewed the Mill Canyon EA and draft Proposed Decision and “determined that there will be no impact to Marine Corps training activities currently planned within the project area.”
- An EIS is not warranted: the EA analysis documented no potentially significant impacts. The EA also complies with CEQ regulations requiring a brief discussion of the reasons for eliminating alternative from detailed study.

Instruction to the Responsible Official

In light of the information you presented, as well as the inherent technical complexity of the fuels and vegetative analysis, I am instructing the District Ranger to assure that the Decision Notice adequately discloses her rationale for the decision and is clearly based upon the Project Record.

I very much appreciate your input during the Objection Period. Our review of your comments has helped us to identify needs for clarification and opportunities for consensus. Consequently, the District Ranger and I are committed to meeting with you prior to the Ranger’s decision. Please contact Ranger Probert to set up a field review at your earliest convenience.

This response is not subject to further administrative review by the Forest Service or the Department of Agriculture (36 CFR 218.10(b)(2)).

Sincerely,

/s/ Edward C. Monnig
EDWARD C. MONNIG
Acting Forest Supervisor

cc: Cheryl Probert