



File Code: 1570-1

Date: July 5, 2006

Craig Thomas
Director
The Sierra Nevada Forest Protection Campaign
915-20th Street
Sacramento, CA 95814

Dear Mr. Thomas:

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 letter indicated that you were the Lead Objector, with Patrick Gallagher, Director of the Sierra Club Environmental Law Program joining you in the Objection. The Bridgeport District advised me that the Sierra Club did not submit comments or express interest during scoping and other public opportunities to comment. E-mails and phone discussions initiated by Forest Environmental Coordinator Kathleen Lucich with yourself and Mr. Gallagher failed to identify any Sierra Club comments. Consequently, I have determined that the Sierra Club is not eligible to object to the District Ranger's Proposed Decision.

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 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[d][1]. The EA also complies with CEQ regulations requiring a brief discussion of the reasons for eliminating alternative from detailed study.



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.”
- The EA incorporated all past project effects into the “Affected Environment” descriptions, including the 2002 Cannon Fire. Relevant impacts associated with the proposal are addressed under “Environmental Consequences.” The Forest has no knowledge of reasonably foreseeable actions within the general area on either National Forest or non-National Forest lands to further address cumulative effects.
- An EIS is not warranted: the EA analysis documented no potentially significant impacts. In addition, the EA confirmed that all action alternatives meet the project purpose and need. There is no acceptable fuels treatment that will *eliminate* the risk of a severe stand replacing crown fire under extreme conditions.

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.

I am also asking the District Ranger to assure that Project Record documents are made available to you as they are finalized. The District will contact you to clarify your document request.

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
Patrick Gallagher/Sierra Club