

**DRAFT DECISION NOTICE**  
**and**  
**FINDING OF NO SIGNIFICANT IMPACT**  
**for the**  
***Biggie Vegetation Management and Fuels Reduction Project***  
USDA Forest Service, Tahoe National Forest  
American River Ranger District  
Placer County, California

The Forest Service has proposed management actions to decrease forest stand density, create more heterogeneous and resilient forest stand conditions, create a fuelbreak along the Mosquito Ridge Road, reduce hazardous fuels, improve efficiency and safety of future wildfire suppression operations, protect rust-resistant sugar pines, improve public safety along roads, and maintain a sustainable road system within the project area. The project area lies along the Mosquito Ridge Road northeast of Big Oak Flat. The legal location includes portions of T14N, R12E, Sections 13, 14, 15, 22, 23, 24 and 25; T14N, R13E, Sections 4, 5, 7, 16, 17, 18, 19, and 20; T15N, R13E, Sections 26, 27, 28, 32, 33, and 34 of the Mount Diablo Base and Meridian, in Placer County, California.

The Forest Service has prepared an Environmental Assessment (EA) for the Biggie Vegetation Management and Fuels Reduction (Biggie) Project in compliance with the National Environmental Policy Act (NEPA) and other relevant laws and regulations. The EA discloses the direct, indirect, and cumulative effects that would result from the proposed alternatives.

This document contains a Decision Notice and Finding of No Significant Impact (FONSI). The Decision Notice identifies the decision and the rationale for its selection. The FONSI describes the factors used in determining that the decision does not cause significant impacts on the human environment and therefore does not require preparation of an environmental impact statement. Additional documentation, including more detailed analyses of project area resources, may be found in the project record located at the American River Ranger District office in Foresthill, California.

### **Decision**

I have read the Biggie Project Environmental Assessment (EA), reviewed the analysis in the project file, including documents incorporated by reference (listed in Chapter 5 of the EA), and fully understand the environmental effects disclosed therein. After careful consideration of the analysis, applicable laws, the Forest Plan, and public comments, I have selected Alternative 1, the Proposed Action. My decision is based on a review of the record that shows a thorough analysis using the best available science.

The selected alternative (Alternative 1) includes the following activities:

- Thin approximately 1,203 acres with ground based equipment.
- Thin approximately 324 acres with cable yarding equipment.
- Pre-commercial thin approximately 305 acres of natural stands.
- Pre-commercial thin approximately 332 acres of plantation stands.
- Prescribe burn approximately 256 acres (not including follow-up fuels treatments in areas proposed for thinning).
- Implement prescribed burning follow-up fuels treatments within the thinned areas.
- Reduce surface and ladder fuels along 13 miles (approximately 481 acres) of roads and ridge-tops to create fuelbreaks. There are approximately 174 acres of overlap between fuelbreaks and other proposed vegetation treatments.

- Protect eleven rust resistant sugar pines by radial thinning within 150 to 300 feet around each sugar pine tree and reducing surface and ladder fuels within the vicinity of the protected sugar pine trees (64 acres).

The selected alternative is fully described in Chapter 2 of the EA and incorporates management requirements (mitigation measures) and Best Management Practices (Appendix C) to reduce and avoid adverse environmental impacts.

## **Rationale for the Decision**

My reasons for selecting Alternative 1 are:

- 1) Alternative 1 would achieve the project Purpose and Need (EA pp. 2-4), far more effectively than Alternative B, the No Action alternative. Meeting these needs is more critical now than when the project was first proposed given the drought conditions of the past few years and the subsequent increase in bark beetle-caused tree mortality.
  - Alternative 1 will improve the treated forest stands' ability to withstand a wildfire by altering existing surface, ladder and crown fuel characteristics, moderating expected wildfire behavior at the landscape level, and improving the efficiency and safety of future wildfire suppression operations.
  - Alternative 1 will reduce stand density, increase tree species diversity and enhance stand structural diversity to develop healthy forest stands that will be more resilient to environmental stresses and disturbances than untreated stands in Alternative 2.
  - Alternative 1 will improve forest health of conifer plantations more effectively than Alternative 2 by promoting a clumped distribution of trees with a variety of size and age classes, making treated areas less vulnerable to stand-replacing wildland fire, insects, and disease, and improving habitat quality and landscape connectivity.
  - Alternative 1 will help protect identified rust resistant sugar pine trees within the project area from wildfire and from environmental stresses due to competition from other nearby trees.
  - Alternative 1 will improve public safety along roads through removal of hazard trees and will provide water sources for long term road maintenance needs.
  - Alternative 1 will enhance dispersed recreation opportunities by adding two short routes to the National Forest Transportation System and Motor Vehicle Use Map.
- 2) Alternative 1 provides for protection of forest resources, including water quality; cultural and historical resources; and riparian areas. It will protect and maintain habitat for Threatened, Endangered and Sensitive plant and animal species and Management Indicator Species.
- 3) Alternative 1 implements applicable standards and guidelines in the *Tahoe National Forest Land and Resource Management Plan* (1990) as amended by the *Sierra Nevada Forest Plan Amendment Record of Decision* (SNFPA ROD 2004).

- 4) Alternative 1 addresses the requirement in NEPA to consider “the degree to which the action may adversely affect” a given resource. I have considered the degree to which this project’s actions add project-specific and cumulative effects to the various resources. I conclude that the Management Requirements (EA pp.19-28) and Best Management Practices (BMPs) (EA Appendix C) included in the Proposed Action reduce effects from this project to a level of non-significance for all affected resources, while still accomplishing the purpose and need for the project.

## **Alternatives Considered**

Two alternatives were considered: Alternative 1, the Proposed Action, and Alternative 2, No Action.

## **Public Involvement**

The Biggie Project has been included in the quarterly Tahoe National Forest Schedule of Proposed Actions (SOPA) since the first quarter of 2012.

A letter was sent to 17 individuals/groups and legal notification was published in The Union newspaper on March 1, 2012 to inform the public about the proposed action (EA Chapter 4). As a result of scoping, written comments were received from four organizations: John Muir Project, Center for Biological Diversity, Sierra Pacific Industries, and Forest Issues Group. In addition, two entities requested to be added to the mailing list and kept informed about the Project. Scoping comments were used to identify issues and develop alternatives, including minor changes to the proposed action alternative (EA pg. 7).

The preliminary EA was available for public comment for 30 days beginning December 29, 2015. Comment letters were received from the Washoe Tribe of California and Nevada, the American Forest Resources Council, the Blue Ribbon Coalition, Sierra Pacific Industries, and one individual. In response to numerous comments, an economic analysis was added to Chapter 3 of the EA. The Washoe Tribe requested a discussion with the project archaeologist about protection of cultural sites; discussions are ongoing. Concerns were expressed about the effectiveness of the proposed treatments and about the effects on recreation us during project implementation. Responses to these and other comments are summarized in an attachment to this document.

## **Finding of No Significant Impacts**

After considering the environmental effects described in the EA, I have determined that these actions will not have a significant effect on the quality of the human environment considering the context and intensity of impacts (40 CFR 1508.27). Thus, an environmental impact statement will not be prepared. I base my finding on the following:

The proposed treatment acres for the Biggie Project represent less than one percent of acreage of national forest lands on the Forest; the entire project area boundary (the larger area considered for treatment) represents approximately one percent of the Forest’s total acreage. Most of the fuels reduction treatments, road work and other project activities would be implemented within three to five years of this decision, and would be conducted during the spring, summer, and fall. The context of the proposed action is limited to minor, local, short-term effects within the Biggie Project area. No significant effects, either long or short term, regional or societal, are anticipated.

### ***1) Impacts that may be both beneficial and adverse***

My finding of no significant environmental effects considers both beneficial and adverse impacts. I did not find any impacts adverse in terms of being significant nor biased by the beneficial effects of the action (EA Chapter 3; pp. 32-150 and supporting resource analyses). Alternative 1 parameters along with the

Management Requirements (EA Chapter 2) and BMPs (EA Appendix C) will mitigate effects to less than significant levels.

*2) The degree to which the proposed action affects public health or safety*

There will be no significant effects to public health and safety. The project involves routine work and activities throughout NFS lands. Signs will be used to warn members of the public about project activities such as vehicles using the road, tree cutting, burning, and equipment usage. Use of mechanized equipment will require a hazardous material spill plan and procedures to minimize any spills adjacent to water. A temporary forest order closing a portion of the project area during implementation may be issued depending upon safety needs related to the timing of ground and hand operations and visitor use. Provisions for public health and safety associated with prescribed burning will be detailed in burn plans requiring approval by Placer County Air Quality Management District.

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

There are no park lands, prime farmlands, or ecologically critical areas within or near the Biggie Project Area.

The Biggie project area has a significant number of sites representing historic and prehistoric use. Historic features unique to the area are primarily associated with historic mining of the area. Historic cultural resources found in the area include grades for roads, ditches; tailings; mines and mining related locales. Prehistoric cultural resources include bedrock milling stations and flaked stone scatters. Project activities planned within the project area are designed to enhance and protect cultural resources, while adhering to the provisions of National Historic Preservation Act (NHPA) and the current Regional Programmatic Agreement with the State Historic Preservation Office.

*4) The degree to which the effects on the quality of the human environment are likely to be highly controversial*

The Proposed Action is consistent with the management direction in the Tahoe NFLRMP (1990), as amended by the 2004 Sierra Nevada Forest Plan Amendment (USDA Forest Service 2004). Potential adverse effects have been minimized to the point where there are few effects to draw controversy. Public involvement efforts did not reveal any significant controversies regarding environmental effects of this proposal (Attachment; EA Appendix B).

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

The effects of the proposed action on the human environment are predictable, based on experience with similar past practices. The ARRD has extensive experience in conducting the kinds of activities proposed. The EA shows that the effects from the proposed silvicultural and road management actions are not uncertain, and do not involve unique or unknown risk (EA Chapter 3; pp. 32-150).

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

The action will not establish a precedent for future actions with significant effects. No significant effects are identified (EA, Chapter 3), nor does this action influence a decision in principle about any future considerations.

*7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts*

Consideration of the effects this project and other ongoing or planned projects in or adjacent to this project revealed no significant cumulative effects. The effects of other foreseeable future actions as well as past actions and ongoing actions were included in the analysis (EA Chapter 3; pp. 32-150).

*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*

Cultural resources will be managed according to provisions of the National Historic Preservation Act of 1966 and the current Regional Programmatic Agreement (RPA). Effects to heritage resources will be avoided by project design and site avoidance following standard resource protection measures that have been developed to implement the applicable RPA provisions (EA pp.19-21).

*9) The degree to which the action may adversely affect an endangered or threatened species or its critical habitat*

The Biggie Project area contains potentially suitable habitat within the range of the Threatened California red-legged frog (CRLF) and Endangered Sierra Nevada yellow-legged frog (SNYLF) and although unlikely, these species may occur in the project area. The project-level BA determined that the proposed action may affect, but is not likely to affect the CRLF and SNYLF; as described in Chapter 2 of the EA, project activities present a negligible risk of direct effects and a negligible to low risk of indirect effects to habitat for these species (Aquatic BA pp. 38-39 and 57-58). No other federally-listed animal or plant species are expected to occur or be affected by project activities in the Biggie project area.

Biological assessments for Endangered and Threatened wildlife and plant species have been completed to document analysis of the potential effects of the alternatives to federally-listed species and its habitat. These analyses provided the basis for informal consultation with USFWS.

Informal discussion with the United States Fish and Wildlife Service (USFWS) Forest and Foothills Branch Office in Sacramento, CA for this project was initiated regarding CRLF May 3, 2013 and informal consultation is ongoing.

The Forest Service batched a number of projects from the Sierra Nevada forests in the range of Sierra yellow-legged frogs, mountain yellow-legged frogs, and Yosemite toads, and prepared a programmatic BA which was submitted to the US Fish and Wildlife Service for formal consultation (USDA Forest Service 2014). This batch of projects included the Biggie project and was included in an appendage to the Biological Opinion from the US Fish and Wildlife Service. The determination in the BO was that these projects may affect the three listed amphibian species and were likely to adversely affect them. The Biological Opinion included requirements and recommendations for ongoing management, monitoring, and reporting to limit adverse effects; my decision incorporates implementation of these requirements and recommendations.

The selected alternative will not cause a trend toward Federal listing or a loss of viability for any Forest Service Pacific Southwest Region Sensitive Species.

*10) Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protections of the environment (40 CFR 1508.27(b) (10))*

Implementation of the proposed actions would not threaten a violation of Federal, State, or local law. The proposed action complies with the National Forest Management Act (NFMA), Endangered Species Act (ESA), Clean Water Act, Clean Air Act, and the National Historic Preservation Act of 1966 (NHPA) and its implementing regulations (36 CFR 800). The proposed action is consistent with the Tahoe National

Forest Land and Resource Management Plan (Forest Plan, 1990) as amended by the Sierra Nevada Forest Plan Amendment (2004) and the 2007 Sierra Nevada Forests Management Indicator Species Amendment

### **Findings Required by Other Laws and Regulations**

As described in the EA (pp. 142-150), this decision is consistent with the provisions of the National Forest Management Act, the National Historic Preservation Act, the Clean Air Act, the Clean Water Act, the Endangered Species Act, and the Migratory Bird Treaty Act.

### **Administrative Review or Objection Opportunities**

This proposed decision is subject to objection pursuant to 36 CFR 218, Subparts A and B. Objections will only be accepted from those who submitted project-specific written comments during scoping or other designated comment period. Issues raised in objections must be based on previously submitted comments unless based on new information arising after the designated comment periods.

Objections must be submitted within 45 days following the publication of a legal notice in the Auburn Journal. The date of the legal notice is the exclusive means for calculating the time to file an objection. Those wishing to object should not rely upon dates or timeframes provided by any other source. It is the objector's responsibility to ensure evidence of timely receipt (36 CFR 218.9).

Objections must be submitted to the reviewing officer: Randy Moore, Regional Forester, USDA Forest Service; Attn: Biggie Vegetation Management and Fuels Reduction Project – Tahoe NF; 1323 Club Drive, Vallejo, CA 94592. Phone (707) 562-8737. Objections may be submitted via mail, FAX (707-562-9229), or delivered during business hours (M-F 8:00am to 4:00pm). Electronic objections, in common (.doc, .pdf, .rtf, .txt) formats, may be submitted to: objections-pacificsouthwest-regional-office@fs.fed.us with Subject: Biggie Vegetation Management and Fuels Reduction Project – Tahoe NF. In cases where no identifiable name is attached to an electronic message, a verification of identity will be required. A scanned signature is one way to provide verification.

Objections must include (36 CFR 218.8(d)): 1) name, address and telephone; 2) signature or other verification of authorship; 3) identify a single lead objector when applicable; 4) project name, Responsible Official name and title, and name of affected National Forest(s) and/or Ranger District(s); 5) reasons for, and suggested remedies to resolve, your objections; and, 6) description of the connection between your objections and your prior comments. Incorporate documents by reference only as provided for at 36 CFR 218.8(b).

### **Contact Person**

For further information concerning this decision or the Forest Service objection process, contact: Karen Walden, Environmental Coordinator, American River Ranger District, 22830 Foresthill Road, Foresthill, CA 95631. Phone: (530) 367-2224.

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Date

Responsible Official, Forest Supervisor

Attachment: Responses to Public Comments

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# Attachment to the Biggie Vegetation Management and Fuels Reduction Project Decision Notice and FONSI

## Responses to Public Comments Received During the 30-Day Comment Period

A preliminary Environmental Assessment (EA) and supporting environmental analyses (resource specialist reports) for the Biggie Project were provided to the public for comment during the 30-day comment period beginning December 29, 2015. The following table lists individuals and organizations who provided timely comments during the 30-day comment period:

Comment Author	Affiliation	Abbreviation
Darrel Cruz	Washoe Tribe of Nevada and California	WT
Dick Artley	Individual	DA
Bill Wickman	American Forest Resources Council	AFRC
Pete Knell	Sierra Pacific Industries	SPI
Don Amador	Blue Ribbon Coalition	BRC

This attachment describes how comments submitted during the 30-day comment period have been considered in the environmental analysis for the Biggie Project. The comments and responses are arranged under the following subject headings:

- Request for Meeting
- Supportive Comments
- Vegetation Management, Fire, and Fuels
- Socio-economics
- Forest Transportation System
- Recreation and Public Safety
- Other Resource Concerns

### Request for Meeting

**Comment WT-1:** *"as the THPO for the Washoe Tribe, I would like to meet with the Project Archeologist prior to project implementation on the project site to discuss project activities in relation to the protection and avoidance measures that the EA states will be adhered to."*

**Response:** The Washoe Tribal Historic Preservation Officer and the project archaeologist discussed issues of concern to the Washoe Tribe in a phone conversation on May 5, 2016 and a site visit is being planned.

### Supportive Comments

**Comment SPI-1:** *"SPI supports the Forest Service's purpose and need for action within the Biggie Project area. We have been involved with the Biggie Project since scoping (Feb. 2012)." "When comparing the alternatives proposed in the Biggie Vegetation Management and Fuels Reduction Project it is clear that Alternative 1 (Proposed Action) gives the forest the greatest opportunity to fulfill its stated purpose and need for action."*

**Response:** Thank you for your support of this project.

**Comment BRC-1:** *"BRC believes timely implementation of this project is a critical factor in the equation to create a safe environment for public use by motorized vehicles on designated roads and trails."*

**Response:** Thank you for your support of this project.

### **Vegetation Management, Fire, and Fuels**

**Comment AFRC-1:** *"The Biggie project should consider the Technical Fuels Report and HFQLG concepts over SPLATS as the TFR and HFGLG have shown to have tremendous effect when it comes to forest thinning treatments in relation to forest health and the reduction of catastrophic wildfires."*

**Response:** The Technical Fuels Report (TFR) referenced by the commenter was developed in July 1995. While various strategies have demonstrated success to varying degrees in the past, fire science continues to evolve. The proposed action and project design were developed based on the best available science and current management direction. Management direction for the Biggie Project is provided by the *Tahoe National Forest Land and Resource Management Plan* (Forest Plan, 1990) as amended by the *Sierra Nevada Forest Plan Amendment* (SNFPA 2004) and the *Sierra Nevada Forests Management Indicator Species Amendment* (2007).

Effects of the proposed alternative on fuels and future wild fire characteristics are compared to the no-action alternative in the Fuels Specialist's Report. Changes in fire behavior were assessed using the Fuels Management Analyst (FMAPlus), a suite of programs which incorporate established published methodologies for computing fire behavior and predicted scorch and mortality by tree species. FMAPlus uses information from field measurements of forest fuels, topography, and weather to model fire behavior and effects at the stand scale. Changes in stand structure following harvest and fuels treatments were assessed using the Forest Vegetation Simulator (FVS). FVS is a model used to summarize current stand conditions, predict future stand conditions under various management alternatives, and update inventory statistics. Pre and post treatment stand data output from FVS was used as input to FMAPlus to predict pre and post treatment (including the no-action alternative) fire behavior and severity potential.

**Comment AFRC-2:** *"It is important that you consider and follow the concepts for fuels reduction and subsequent strategy of fuel breaks on a landscape basis. This is something that GTR220 does not offer."*

**Response:** One of the primary objectives described in the purpose and need for the Biggie Project is to "moderate expected wildfire behavior at the landscape level through strategic placement of fuels reduction activities." The proposed action will accomplish this by reducing surface and ladder fuels along 13 miles (approximately 481 acres) of roads and ridge-tops to create fuelbreaks" (EA pg. 3-4).

**Comment AFRC-3:** *"Concern relative to snag retention in fuel (reduction) zones. In order to provide firefighter safety, snags are not recommended in this area...post treatment burning will create plenty of snags."*

**Response:** The retention or removal of snags relative to project implementation will prioritize public and employee safety, but follow management direction for the Forest, and be subject to consultation with fire, fuels, timber, and wildlife management specialists. The commenter's assertion that "post treatment burning will create plenty of snags" is not necessarily correct. Prescribed fire objectives vary with fuel, weather, climate, and topographical conditions, as well as resource management goals. They may or may not include snag recruitment.

**Comment AFRC-4:** *“Primary travel ways should be void of snags for the first 150-300 feet.”*

**Response:** Treatment of roadside hazard trees to increase public safety is a stated element of the Biggie Project purpose and need for action. Roadside hazard tree removal along all Maintenance Level (ML) 3, 4 and 5 roads within the project area and roadside hazard tree removal along ML 1 and 2 roads being utilized for project implementation are stated objectives of the proposed action.

**Comment AFRC-6:** *“Nowhere in nature does a forest grow or manage itself with diameter limits.” Do not manage the forest using diameter limits, as it can limit necessary treatment. “What is most important in effectiveness is that treatments are intensive enough and that they occupy enough of the landscape to be effective. It is also clear that leaving large areas untreated, makes it more likely for fires to pick up “steam” and become more difficult to control and emit more smoke.”*

**Response:** The current land management plan standards and guidelines require the use of specific diameter limits in project design and implementation. We recognize that additional forest lands also need treatment, and are planning additional vegetation management projects.

### **Forest Transportation System**

**Comment SPI-3:** *“It appears that Proposed Activities 14 (Change the current motorized use designations on five road segments, totaling approximately 2.9 miles), 15 (Decommission approximately 5.6 miles of roads), and 16 (Install gates, affecting approximately 4.6 miles of roads that are currently closed to the public use) may be in conflict with Project Need #7 (Actions are needed to maintain a road system in the Biggie Project Area that provides sustainable access for the administration, protection and utilization of national forest lands and resources, consistent with Forest Plan direction). Do Proposed Activities 14, 15 and 16 impact the Forest's ability to efficiently and safely conduct future fire suppression activities within the Biggie Project area?”*

**Response:** Proposed Activity 14 changes motorized use designations as described in Table 6 of the EA; the Forest Service has determined that this action would/would not hamper fire suppression activities because they are available for administrative use or are in areas that are accessible or nearly so by other, open and maintained roads.

Activity 15 proposes decommissioning 5.6 miles of roads as shown in Table 6 of the EA. While decommissioning roads may reduce some vehicle access (especially as the old road bed grows over), the routes proposed are: 1) Not maintained, therefore of increasingly questionable utility to fire fighting vehicles; 2) Subject to unauthorized public use (primarily off-highway vehicles) which itself presents an increased potential for human-caused wildfires; 3) In areas that are accessible or nearly so by other, open and maintained roads.

Proposed activity 16 restricts public access consistent with the Forest's Motor Vehicle Use Map as shown in Table 6 of the EA. The routes would remain open for administrative use, including fire suppression activities. Restricted (gated) and re-designated roads still provide access for suppression forces.

Changing motorized use designations, decommissioning roads, and restricting unauthorized access to roads currently closed to public use is not expected to have a significant negative effect on the ability of firefighters to efficiently and safely conduct future fire suppression activities within the project area.

### **Social and Economic Analysis**

**Comment SPI-1:** *“Project needs 4, 5 and 6 touch on the social benefits of the Biggie Project but there is really no mention of the economic benefits. The EA should include a project need that is specific to the supply of forest products for local forest industries and the associated benefits to local communities.”*

**Comment AFRC-6:** *"The Biggie project should provide a Purpose and Need statement in relation to Social and Economics."*

**Response:** While the purpose and need of this project is to manage vegetation, we do recognize the social and economic relationship between the Forest Service and local forest industries and communities. In response to these and other similar comments, we have added an economic analysis to Chapter 3 of the Biggie EA. The social effects of the project are discussed in the Recreation, Lands, and Visual Quality section of Chapter 3.

**Comment DA-1:** *"The pre-decisional EA contains no economic analysis to determine if the USFS will spend more money planning, preparing and administering the sale than they receive from the timber purchaser who buys the sale."*

**Response:** Applicable law, regulation, and policy do not require this kind of cost/benefit analysis for projects. An economic analysis has been added to the Biggie EA in response to several comments on the economic effects of the project.

**Comment AFRC-7:** *"The Responsible Official should identify and understand the social and economic systems related to the plan area. Address the issue that this social and economic impact is having on your ability to accomplish your projects." Address effects on rural communities, mill closures (infrastructure), job stability and quantity, schools, and Stewardship contracts."*

**Response:** Forest Service Manual, Section 1920 Land Management Planning, provides direction on the process for developing a Forest-level land and resource management plan and its requisite contents. (Note – the commenter has cited from the old FSM, which was fully revised in 2015. The revised FSM has similar language at 36 CFR 1920.12 and both the 2012 planning regulation and the revised FSH 1909.12 Chapter 20 provide direction for contributing to social and economic sustainability through land management planning.) Direction for designing and developing site-specific vegetation and fuels treatment projects is provided in the existing *Tahoe National Forest Land and Resource Management Plan* (1990) as amended by the *Sierra Nevada Forest Plan Amendment (SNFPA) Record of Decision* (2004). The National Environmental Policy Act (NEPA) requires environmental analysis of proposed actions that may affect the natural and physical environment and the relationship of people with that environment. For this reason, additional documentation has been added in the Deadwood EA to address the economic effects of the proposed action and alternatives.

**Comment AFRC-8:** *"The NEPA analysis should address the impact of reduced forest management and the effects on rural counties and communities"*.

**Response:** Chapter 3 of the Biggie EA discloses the economic effects of the proposed action and alternatives. Analyzing the impacts of changing forest management practices and the effects it might have on rural counties and communities is beyond the scope of this EA.

**Comment AFRC-9:** *"Discuss the loss of forest products infrastructure, both mills and biomass facilities, and how that loss affects the ability to economically accomplish your projects."*

**Response:** The Forest Service relies on forest products infrastructure to achieve multiple forest resource management objectives. As indicated in the commenter's letter, there have not been any recent mill closures in Placer County. Currently, pine tree species harvested from the American River Ranger District are generally sent to the Sierra Pacific Industries mill in Lincoln, California. Fir tree species are

distributed across several mills in the California Central Valley. An economic analysis of the proposed action and alternatives is included in Chapter 3 of this EA.

**Comment AFRC-10:** *“What does each forest health project mean to the local workforce as far as number of jobs supported or created? Discuss not only the jobs created directly to forest and forest infrastructure, but also the indirect jobs that such job sustainability means to the communities.”*

**Response:** The economic analysis presented in Chapter 3 of the Biggie EA analyzes both direct and indirect employment under each alternative analyzed in detail.

**Comment AFRC-11:** *“Discuss new information on the California Spotted Owl based on: [http://www.indeed.com/viewjob?jk=fa1595991717de2a&l=Grass+Valley,+CA&tk=1abrcl0sa1pndafi&from=ja&alid=44debc96aa03f7e7&utm\\_source=jobseeker\\_emails&utm\\_medium=email&utm\\_campaign=job\\_alerts](http://www.indeed.com/viewjob?jk=fa1595991717de2a&l=Grass+Valley,+CA&tk=1abrcl0sa1pndafi&from=ja&alid=44debc96aa03f7e7&utm_source=jobseeker_emails&utm_medium=email&utm_campaign=job_alerts)”*

**Response:** The study referenced discusses the efficacy of managing for spotted owl habitat as an umbrella for protecting other wildlife species in the Sierra Nevada. While some measures in the Forest Plan incorporated into the Biggie project are intended to protect spotted owls, northern goshawk, and, to the extent possible, other mature forest species, the project is also intended to increase stand resilience to fire and drought and to reduce the density of shade tolerant incense cedar and white fir to benefit pine and oak species. In addition, the project would follow the guidance of GTR 220 to increase overall heterogeneity of stands by varying density prescriptions. More open, brush and herb-dominated areas occur alongside roads and in the large, recent wildfire areas adjacent to the Biggie project. As described in the BE, BA, MIS, and MBTA reports for the project, these treatments are expected to have varying but generally beneficial effects for the species and habitat types considered.

**Comment AFRC-12:** *“Discuss the impact if you plan on using Stewardship contracts to accomplish the projects and the fact that there is not legal provision under that legislation to collect revenue generated from those contracts back into NFF (National Forest Fund).”*

**Response:** The commenter is correct that revenue from Stewardship contracts does not go into the National Forest Fund; however, there are several benefits to awarding a Stewardship contract. The Forest Service uses stewardship contracting as a tool to achieve restoration objectives, such as road and trail maintenance, hazardous fuels reduction, small stem removal, watershed restoration, wildlife and fish habitat restoration, and noxious weed control (FSH 2409.19, Chapter 60). Receipts from forest products that are removed would be retained and applied to such service work. Without net revenues generated from harvest volume, service items included in the Biggie Project action alternatives would need to be covered by another source of funding, such as grants or appropriated funds.

**Comment AFRC-13:** *Discuss the relationship between wages and benefits for mill/co-generation and woods workers to that of jobs related to recreation and tourism.*

**Response:** Direct and indirect employment opportunities created as a result of implementing the proposed action and alternatives have been disclosed in Chapter 3 of the Biggie EA.

**Comment AFRC-14:** *Discuss the Secure Rural Schools Act, its social and economic benefits to the counties and communities. What has that meant in relation to the previous National Forest Fund (NFF) deposits and receipts before and after the decline in the timber supply from the Tahoe National Forest. What is the declining scale and the impact in relation to the current President's budget and the proposal to go to zero in five years?*

**Response:** Early in the 20th century, the Federal government recognized that counties faced a loss of revenue due to public ownership of large tracts of land. Historically, Congress shared revenue generated from national forest lands with local governments, recognizing that public ownership of forestlands deprived counties of revenue they would have if the land were privately owned. Shared revenue also recognized that counties provided services that benefited the land.

The Twenty-Five Percent Fund Act of 1908 (P.L. 60-136; 16 U.S.C. 500, 533, and 556d) relates to the national forests, and is administered by the Forest Service. The Act provides that 25 percent of harvest receipts from a national forest are distributed to counties based on the acreage that each county has within that forest. County receipts are dedicated to roads, 75 percent, and schools, 25 percent, respectively.

As timber harvests dramatically declined in the 1990s, counties encountered financial difficulties due to the lost revenue. To address this problem, the Secure Rural Schools and Community Self-Determination Act (P.L. 106-393) was enacted in 2000. The Act had three purposes:

1. to stabilize payments to counties to provide funding for schools and roads;
2. to make additional investment and create employment opportunities through projects that improve maintenance of existing infrastructure, implement stewardship objectives that enhance forest ecosystems, and restore and improve land health and water quality; and
3. to improve collaborative relationships and to provide assistance and recommendations to land management agencies among people who use and care for Federal lands and agencies that manage those lands.

The Act provided compensation for lost forest revenues to counties at a rate tied to the three highest years of harvest receipts from fiscal years 1986 to 1999. The funding came in three forms:

- Title I safety net payments for county services and schools;
- Title II for restoration of healthy conditions on public lands under guidance of Resource Advisory Committees; and
- Title III for county services related to federal forest lands, such as search and rescue and wildfire protection.

The Act expired in 2007 but was reauthorized for the 2007-2008 fiscal year. In September 2008, Congress reauthorized payments on a four-year phase out schedule, providing 90 percent of the 2006 payments to counties for the 2008-2009 fiscal year, 81 percent for the 2009-2010 fiscal year, 73 percent for the 2010-2011 fiscal year, and approximately 42 percent for the 2011-2012 fiscal year. After that time, revenue sharing is to be based on a seven-year rolling average of actual harvest, which currently amounts to about 10 percent of the 2006 safety net payments.

Placer County, where the Biggie Project is located, currently receives transition payments under the phase out schedule of the Secure Rural Schools and Community Self-Determination Act. This Act was reauthorized for 2014-15; however, at this time, future reauthorizations are uncertain.

**Comment AFRC-15** *Address the social and economic impacts of loss of water yield due to over-crowded forests.*

**Response:** While changes in water yield are known to occur as a result of forest vegetation manipulation, water yield was not selected as an indicator for this project; often the effects of tree removal are not great enough to be differentiated from the variability in annual precipitation.

**Comment AFRC-16** *Address the social and other effects of stand-replacing wildland fire such as increase in greenhouse gases, human health effects from smoke, effects to recreation, scenic resources and related economic effects to business that depend on recreation and tourism.*

**Response:** We recognize the potential for a broad range of impacts from stand-replacing wildland fire, and included the following in the Purpose and Need *“Decrease the potential for severe wildfire effects to forest resources and infrastructure improvements within the Project area and beyond.”* This is discussed in more detail on Pg. 3 of the EA.

### **Recreation and Public Safety**

**Comment BRC-2:** *“To the extent possible keep OHV routes open for weekends and holidays. Temporary closures should be limited to the weekdays and only on the segment of the routes where active logging operations are underway.”*

**Response:** We recognize the need to maintain recreation opportunities during vegetation management operations. The management requirements stipulate *“Whenever possible, keep open all roads, trails and trailheads open for public use. Establish detours where needed and feasible”* (EA, pg. 21).

**Comment BRC-3:** *“If designated level II roads or OHV trails are damaged an attempt should be made to repair damage...Avoid impacts to trails where possible during tree felling, skidding and hauling operations.”*

**Response:** The Management Requirements Table includes the following: *“Maintain haul roads before, during, and after use. Place emphasis on post haul maintenance of road surface, and the surface drainage crossings to reduce erosion potential”* EA, pg.22). This table also includes other requirements to protect OHV routes.

**Comment BRC-4:** *“Retention of merchantable sized dead and all green trees along OHV trails to be used as barriers, trail delineators, and route anchors.” “Where available sub-merchantable material should be left an adequate distance from the side of the trail to discourage off-trail riding (around 15-25 feet).” “Protect all sprouting species to facilitate growth of a barrier, green screen, and improve rider experience.” “Where possible every attempt should be made to visually and physically disconnect OHV trails from skid trails (i.e. junctions) this will discourage OHV trespass and associated erosion.”*

**Response:** The Management Requirements table in the EA (pp. 19-28) includes several similar requirements to maintain and protect recreation trails.

**Comment BRC-5:** *“Closure signs should be posted along trails or roads that are temporarily closed during active logging operations. Updates to which trails and roads are closed should be provided at the Forest Service District Office and website.”*

**Response:** Public notification of logging operations is planned and is discussed on pp. 20-21 of the EA.

### **Other Resource Concerns**

**Comment BRC-6:** *“Skid trails should be designed to not increase OHV trail erosion. The number of skid trails across OHV trails should be minimized.” “Skid trails should be covered with brush leading to at least 30% cover in areas of sensitive and erodible slopes.”*

**Response:** The Management Requirements table includes the following: *“In all units with ground-based thinning and fuels treatment activities, maintain at least 50% effective soil cover”* (EA, pg.26).

**Comment BRC-7:** *"BRC believes the success - as it relates to OHV access - of this endeavor hinges on the Forest allocating the appropriate human resources for proper layout and monitoring of the project."*

**Response:** We agree. Our management requirements table identifies which resource specialists are responsible for ensuring that each management requirement is implemented on the ground.

**Comment DA-2:** *"Ranger Lyon, Federal officials working for any agency who knowingly take action that will place public health and safety in jeopardy by "concealing" important information violate 18 U.S.C. 1001....If you will apply herbicides that contain glyphosate, please think again."*

**Response:** The use of glyphosate herbicides is not proposed for the Biggie Project on NFS land. Private landowners may use herbicides on their own lands.

**Comment AFRC-17** *Address the effects of stand-replacing wildland fire on at-risk wildlife species.*

**Response:** The effects of wildland fire on wildlife habitat are discussed both in the Purpose and Need (pg. 3) and in numerous places in the Wildlife section of Chapter 3.