

**DECISION NOTICE
AND
FINDING OF NO SIGNIFICANT IMPACT (FONSI)
ROCKY PARK FUELS REDUCTION PROJECT
ENVIRONMENTAL ASSESSMENT (EA)
MORMON LAKE RANGER DISTRICT
USDA FOREST SERVICE
COCONINO COUNTY, ARIZONA**

DECISION AND RATIONALE

The project area is approximately 13,700 acres in size and is located on both sides of I-17 from the Schnebly Hill interchange south to near the Mogollon rim. One parcel of private land is located within the project boundary. Major forest roads in the area are FR 226 and FR 153. See map.

It is my decision to select Alternative A. Alternative A will best meet our purpose and need and project objectives.

One of the project's primary goals is the reduction of catastrophic (crown) fire. The risk reduction is accomplished by reducing the amount of ladder fuels and tree canopy fuels, as well as by reducing the amount of ground fuels. Reducing ground fuels temporarily reduces the fuel load and ground fire intensity that could initiate a crown fire. Removing ladder fuels will reduce the potential for ground fire to climb into the tree crowns. However, only by recreating a discontinuous canopy layer can a treatment inhibit the rate of spread and the eventual extent of a destructive crown fire.

In order to continue providing quality resource values and recreation opportunities in the Rocky Park project area, vegetation treatments are necessary to perpetuate existing older trees (particularly ponderosa pine), and to manage younger trees to guarantee quality stands in the future. Resources such as light, moisture, and nutrients will be available to promote rapid recovery of the under story plant community. Fuels, both living and dead, will be restored to carry low-intensity surface fires. These treatments would enhance both the site-specific and overall character of this analysis area.

Alternative A will significantly reduce the likelihood that a fire starting within the project area would become a destructive crown-fire. The proposed activities would significantly reduce dense under-story conditions and accumulated forest floor fuels. By reducing the fire risk adjacent to the Mexican spotted owl (MSO) Protected Activity Centers, we have a greater chance of protecting MSO habitat from fire. By reducing the fire risk adjacent to the privately owned property (in the center of the project area) we increase our chances of controlling any fire occurring in the area.

A note on tree sizes

The Rocky Park area is unique because of rocky, dry soils, transition between pine and juniper grassland, the proximity of I-17 and private property. The team evaluated the immediate need to reduce risk of wildfire losses of MSO habitat and private property. The majority of the forest structure contributing to wildfire potential consists of trees less than 12 inches due in part to the rocky, dry soils of the area. The choice to emphasize trees less than 12 inches for thinning does not fully meet the needs of the forest in terms of improving structural diversity and health, however, it does go a long ways towards meeting those needs. Because the objective for this area was to address

the immediate need of reducing wildfire potential, I chose to narrow the scope of this project to thinning in the understory, trees less than 12 inches diameter. This focus does not preclude future thinning in this area of trees larger than 12 inches under separate NEPA analysis. Many of the benefits achieved by this treatment will only exist for a decade or so. Within twenty years, growth of the retained trees (especially the young and mid-aged) will bring competition and canopy closure back to pre-treatment conditions.

Alternative A - Selected Alternative

Below is a brief description of Alternative A. Additional detail is located in the Environmental Assessment (EA).

Alternative A will:

Apply a combination of thinning and burning treatments to reduce the risk of catastrophic fire and improve habitat for many native wildlife species. (An attached map shows the location of thinning and burning.) Interlocking tree crowns will be reduced, lessening the risk of catastrophic crown fire. Thinning will also progress stands towards desired conditions outlined in Amendment 11 of the Forest Plan (owl and goshawk guidelines).

The trees removed would be less than 12 inches dbh (diameter at breast height). This thinning would probably occur between April and October. The following descriptions detail how thinning and burning applications will differ over the project area.

2196 acres (**Fire Hazard Reduction & Forest Health**) this thinning would substantially reduce the fire hazard by thinning Ponderosa Pine trees up to 12” dbh. The remaining trees would emphasize a groupy/clumpy appearance. The thinning slash would be rough-piled or windrowed and then burned (once it has cured) where heavy concentrations of slash were generated. After that these acres would also receive an under-burn mimicking a naturally occurring lightning fire.

800 acres (**Eagle & Turkey Winter**) this thinning would still reduce the fire hazard, but is modified to maintain bald eagle and turkey winter use areas. Ponderosa pine and juniper trees less than 12”dbh would be removed from under eagle roost trees and might result in 100% of these smaller trees being removed up to 30 feet beyond the drip-line of the roost tree groups. This thinning should prolong the life of existing yellows and large trees by reducing competition for nutrients and water. This thinning would identify and promote the health of middle-aged trees. In ponderosa pine areas, created openings would range from 0.1 to 0.25 acres in size and average 1 opening per acre. Within thinned stands, some slash piles would be left adjacent to these openings for turkey cover. Within a mile of turkey roost trees, dense clumps of trees would also be retained to provide turkey cover. These acres would also receive an under-burn mimicking a naturally occurring lightning fire. No more than 25% of the area would be burned during any given year. No thinning would occur in this area between November 1 and April 15 to minimize disturbance to wintering eagles.

700 acres (**Yellow Pine Competition Reduction**) this thinning would still reduce the fire hazard, but would be limited by tree age, as well as by tree size. The bark of ponderosa pine trees acquires a “yellow” shade as they approach 150 years of age. No “yellow” pine would be thinned. No trees larger than 12” dbh would be thinned. This thinning is designed to prolong the life of existing “yellows” and other large trees by reducing competition for nutrients and water. This thinning would also identify and promote the health of middle-aged trees. This treatment would remove ladder fuels

from around the mature trees (yellow bark). It might result in 100% of the smaller trees (less than 12” dbh) being removed for a distance of 30 feet beyond the drip-line of a mature Ponderosa. These acres would also receive an under-burn mimicking a naturally occurring lightning fire.

700 acres (Turkey Winter Habitat) this thinning would still reduce the fire hazard, but is modified to help maintain turkey winter habitat. Thinning ponderosa pine and juniper trees less than 12”dbh would create small openings on soils suitable for forage production. In ponderosa pine areas the openings would range from 0.1 to 0.25 acres in size and would average about 1 opening per acre. Within thinned stands, some slash piles would be left adjacent to these openings for turkey cover. Within a mile of turkey roost trees, dense clumps of trees (greater than 85 basal area) would also be retained to provide turkey cover. These acres would also receive an under-burn mimicking a naturally occurring lightning fire. No more than 25% of the turkey winter-range would be burned in any given year to ensure adequate winter forage.

700 acres (Turkey Summer Habitat) this thinning would still reduce the fire hazard, but is modified to maintain and improve turkey summer habitat. Thinning ponderosa pine and juniper trees less than 12”dbh would create openings 2-5 acres in size on soils suited for turkey summer forage. Within ponderosa pine stands the openings would be long and narrow (not to exceed 240 feet wide) with an irregular edge. Shrub thickets or tree clumps would be maintained within any openings larger than 10 acres to provide turkey cover. Within thinned stands, some slash piles would be left adjacent to those openings for turkey cover. These acres would also receive an under-burn mimicking a naturally occurring lightning fire.

330 acres (Restricted Habitat, Mexican Spotted Owl) this thinning would somewhat reduce the overall fire hazard, but is primarily designed to maintain and promote MSO habitat and reduce the risk to MSO restricted habitat from a destructive fire. Ponderosa Pine trees up to 12” dbh would be thinned. Slash would be piled and burned. These acres would also receive an under-burn mimicking a naturally occurring lightning fire. Microhabitat monitoring would be conducted according to Southwest Regional Protocol.

252 acres (Protected Habitat, Mexican Spotted Owl) Thinning ponderosa pine trees less than 9”dbh on these acres would enhance MSO habitat identified as protected. Thinning would remove under-story trees (less than 9 “dbh) to enhance nesting/roosting habitat, as well as reduce the risk of a catastrophic fire. Not all acres would receive an under-burning. However on the acres that were under-burned, measures would be taken to protect large trees, snags and logs (with a midpoint diameter greater than 12”). If this thinning increased the amount of sunlight reaching the ground, it would enhance grass, forb, and shrub production. Slash would be hand-piled on steep slopes to minimize soil disturbance. Thinning would NOT occur within ¼ mile of an occupied PAC during breeding season (March 1 to August 31). This thinning will extend 500 feet north of FR 226 for approximately a mile. Microhabitat monitoring would be conducted according to Southwest Regional Protocol.

8000 acres (Under-burn Only, No Thinning) This burning would reduce the fire hazard, but these stands would not be thinned. Stands in which there is already a low-risk of catastrophic fire would not be thinned. Stands in which the trees are already adequately spaced apart would not be thinned. Stands in which the immediate necessity for wildlife-cover outweighs the risk of a fire would not be thinned. These “Under-burn only” acres would receive a burn mimicking a naturally occurring lightning fire. A relatively cool under-burn would release nutrients back into the soil, stimulate

grass and forage production, and postpone a further accumulation of dead fuel. If these acres were burned with enough frequency, the fire risk would remain manageable.

200 acres - Remove seedling and sapling trees (Ponderosa Pine and Juniper) from the meadows.

There are 200 acres of meadows ranging in size from 2 to 14 acres. These meadows would have resisted tree encroachment under a naturally occurring-fire cycle. Under the proposed action, trees would be removed by hand cutting with chainsaws. Meadows would be burned in coordination with the surrounding tree stands until a natural fire regime could be reestablished.

Noxious weed treatments would be needed over the next 10 years. Current and future populations of diffuse knapweed, bull thistle, and other noxious weeds would be pulled, cut, mowed, steamed, dug or burned to reduce future spread of these species. A noxious weed strategy would be developed for this project and a threatened, endangered, and sensitive species-specialist would be consulted before each activity.

The list of coordinating requirements and mitigation measures listed in section 2.5 of the EA, and Appendix A, will be applied when implementing this project.

This includes the following: 1) Thinning, piling and pile burning will not occur in MSO PACs during the breeding season, 2) All restricted and protected habitat has been surveyed to protocol prior to project implementation. MSO habitat where surveys were completed, but more than one breeding season has elapsed, will be surveyed prior to project implementation, 3) Treatments occurring in protected and restricted habitats are within the guidelines put forth in the Recovery Plan, 4) Microhabitat monitoring will be conducted pre and post-treatment in MSO habitat according to USFS Region 3 protocol, 4) Thinning and burning in bald eagle roost stands will occur outside of the winter use season for eagles, 5) Smoke impacts will be of short duration during the bald eagle winter use season and 6) Large yellow pines and snags will be retained in bald eagle roost stands.

Other items listed in section 2.5 of the EA and in the attached Appendix A, will be followed when implementing this project. Topics covered include smoke management, rare plant coordination, visual quality maintenance along major roads, dispersed campsite protection, cultural resources coordination, best management practices for protection of soil and water resources, coordination with Arizona Department of Transportation, and implementation techniques for line construction, thinning, burning and slash disposal. Per the clarification in Appendix A, chipping and hauling chips off site may be a slash disposal technique outside of bald eagle winter roost stands and MSO protected habitat.

Access policy and road maintenance objectives are not changed as a result of this decision.

Other Alternatives Considered

Alternative B is the No-Action Alternative. It is used as a baseline to measure effects if no changes to current trends are implemented. The no-action alternative represents the status quo for the Rocky Park Project area. This alternative takes no steps to change, or alter the progression of forest conditions. Current activities will continue and there will be no thinning of the forest understory or broadcast burning in the area. Under Alternative B following the Three-forest Noxious Weeds Strategic Plan Working Guidelines, noxious weeds will be removed as personnel and funding permits, depending upon the noxious weed and seriousness of the threat.

A prescribed fire without thinning alternative was not developed as a distinct alternative for the entire project area, because 1) prescribed fire alone is not effective in thinning the sizes of tree in the project area and 2) prescribed fire alone does not substantially reduce the risk of future catastrophic wildfire because not enough trees are killed. Using prescribed fire without thinning does not substantially reduce the risk of a catastrophic wildfire.

Additional measures to improve driver visibility of animals crossing I-17, reduce vegetation in vehicle recovery areas adjacent to the highway for safety and decrease shading to enhance snowmelt were not carried forward in the alternatives considered in detail. All these objectives are not equal to the purpose and need described for the Rocky Park project area. Alternative A, does provide some progress towards these goals while also meeting our purpose and need for fuels reduction. Close coordination will occur when implementing treatments in the I-17 corridor.

PUBLIC INVOLVEMENT AND SCOPING

The Rocky Park project has been listed on the Coconino National Forest Schedule of Proposed Actions (SOPA) since December, 2000. The SOPA was mailed to over 500 addresses. In January, a letter describing proposals for the area and seeking public comment was mailed to approximately 15 individuals and groups that expressed interest in the project vis the SOPA. A total of two responses to this proposed action were received. I have read and considered all comments received. No significant issues were identified.

I understand one author's concerns about prescribed burning and fire control. However, eliminating broadcast burning does not meet the needs for this project. The thinning and pile burning will occur prior to broadcast burning and these treatments will create conditions appropriate for a broadcast burn. Most broadcast burning will occur in spring and fall and in addition, I have instructed fire management personnel to notify these landowners and discuss the timing of broadcast burns prior to their ignition to help avoid any times that would be greatly inconvenient for the landowner. Broadcast burns are conducted under approved burn plans that contain contingency plans for containing burns that develop undesirable fire behavior.

The second author suggested items to include in the analysis and implementation. I appreciate these suggestions and feel I have a good understanding of the effects of the project, based on the team's analysis. This author expressed that trees should be marked prior to cutting and this will be done by Forest personnel.

Notice of formal comment period for this EA was published in the Arizona Daily Sun on June 15th, 2001. One letter was received and these comments are listed in Appendix A – Reponse to Comments (attached).

FUTURE NEPA ACTIONS

The Environmental Assessment will guide any subsequent project implementation related thinning and prescribed fire as described in Alternative A. Future site-specific project proposals will be tiered to this Environmental Assessment (40 CFR 1508.28). Tiering means that, if needed, future environmental documents for projects based on this document will summarize or incorporate by reference the issues discussed in this analysis. Environmental documents for those projects will focus on site-specific issues unique to the proposed project.

FINDING OF NO SIGNIFICANT IMPACT (FONSI)

Context. This project is a site-specific action that by itself does not have international, national, region-wide or statewide importance. The discussion of the significance criteria that follows applies to the intended action and is within the context of local importance in the area associated with the Rocky Park Fuels Reduction project area.

Intensity. The following discussion is organized around the Ten Significance Criteria described in the National Environmental Policy Act (NEPA) regulations (40CFR 1508.27).

1. The analysis considered both beneficial and adverse effects. Impacts from this project are both beneficial and adverse. The adverse effects are short term in nature and will not impair land productivity. The long-term effects are considered to be beneficial especially for fire risk reduction, turkey, bald eagle, Mexican spotted owl and goshawk habitat and forest health conditions. The EA contains a complete discussion of the effects in *Chapter 3*.

2. There are no known adverse impacts to public safety. The intended action will not affect public health and safety. Standard forest service safety requirements will be used for thinning, pile burning, broadcast burning and noxious weed treatments.

3. No unique characteristics of the geography, such as cultural resources and wetlands, will be adversely affected. The Rocky Park Fuels Reduction project area is not located near any, parklands, prime farmlands, wetlands or ecologically critical areas. A cultural resources clearance report is complete with concurrence from the State Historic Preservation Officer (SHPO). *Chapter 1* of the EA describes the location of the area.

4. The effects on the quality of the human environment are not likely to be highly controversial. The effects of the project are limited to the Rocky Park Fuels Reduction project area. While some people have disagreed with the use of broadcast burning, no person has provided evidence that the environmental effects of the project have been wrongly predicted; therefore the effects are not likely to be controversial. Comments received are summarized in Chapter 1 of the EA and Appendix A to the EA.

5. The degree of possible effects on the human environment are not highly uncertain, nor are there unique or unknown risks involved. The environmental effects are typical of thinning and prescribed fire on the Coconino National Forest. The adverse effects will be short term and involve no unique or unknown risks. Effects are discussed in *Chapter 3* of the EA.

6. Site specific actions found as part of this decision do not set a precedent for future actions, which may have significant effects, nor does this represent a decision in principle about a future consideration. A decision to thin and conduct prescribed fire as described in the selected Alternative A, does not establish any future precedent for other actions that may have a significant effect. Future actions will be evaluated through the NEPA process and will stand on their own as to the environmental effects and project feasibility.

7. These actions are not related to other actions that, when combined, will have significant impacts. Cumulative effects are documented in *Chapter 3* of the EA. There are no actions related to other action that when combined will have significant impacts.

8. This decision will not contribute to the loss or destruction of significant scientific, cultural, or historic resources. Prehistoric and Historic sites in the area will be located, marked and then avoided prior to any ground disturbing activity (Project Record #43 contains cultural resources clearance reports and concurrence from the State Historic Preservation Officer).

9. This decision will not adversely affect any threatened or endangered species of plants or animals or habitat critical for the management of these species. A biological assessment and evaluation was completed for this project (Project Record #31). The US Fish and Wildlife Service has concurred (Project Record #44) with the determination that this action may affect, but will not likely adversely affect the Mexican Spotted Owl and the Bald Eagle.

10. This decision does not violate or threaten to violate Federal, State, or local laws, or requirements imposed for the protection of the environment. The local city and county governments were provided the Schedule of Proposed Actions (SOPA) and did not respond with any comments or concerns.

I find that implementing Alternative A does not constitute a major Federal action that would significantly affect the quality of the human environment in either context or intensity. I have made this determination after considering both positive and negative effects, as well as direct, indirect and cumulative effects of this action and foreseeable future actions.

I have found that the context of the environmental impacts of this decision is limited to the local area and is not significant. I have also determined that the severity of these impacts is not significant.

OTHER FINDINGS

This decision meets the intent of and complies with the Coconino Forest Plan.

The Decision complies with relevant laws summarized in Chapter 1 of the EA.

Biological evaluations and consultation with US Fish and Wildlife Service are complete. Cultural Resources Clearance and consultation with the State Historic Preservation Officer is complete.

The Decision also complies with Arizona State laws regarding natural resource protection, including but not limited to water quality, as well as county and city resource protection measures.

EFFECTIVE DATE AND IMPLEMENTATION

This project will not be implemented sooner than five business days following the close of the appeal filing period established in the Notice of Decision in the *Arizona Daily Sun*. If an appeal is filed, implementation will not begin sooner than 15 calendar days following a final decision on the appeal. Although the policies will take effect at that time, I expect that the actual on-the-ground implementation will be phased in over the next 10 years.

ADMINISTRATIVE REVIEW

This decision is subject to administrative review pursuant to 36 CFR 215 and 251 (251 for permittee's only). For 215 and 251 a written notice of appeal must be filed with Regional Forester within 45 days of the date that a notice of this decision is published in the *Arizona Daily Sun*. A

notice of appeal must be fully consistent with the requirements found in 36 CFR 215 and 251. At a minimum a written notice of appeal must include the following:

- State that your appeal is filed pursuant to 36 CFR 215 or 251.
- Provide your name, address and telephone number.
- Identify this Decision Notice by its title.
- Identify the decision or decisions you wish reviewed.
- State the reasons for your objections, including issues of fact, law, regulation, or policy, and if applicable, specifically state how the decision violates law, regulation, or policy.
- Identify the specific change or changes in the decision that you seek.

A notice of appeal may include a request for stay to keep the decision from being implemented. A request for stay should provide the following information:

- A description of the specific actions to be stopped by the stay.
- Specific reasons why the stay should be granted. This should contain sufficient detail to permit the Reviewing Officer to evaluate and rule upon the stay request. At a minimum you should discuss the specific adverse effects of implementation upon you; harmful site-specific impacts or effect on resources in the area affected by the activity or activities to be stopped; and how the cited effects and impacts would prevent a meaningful decision on the merits of the appeal.

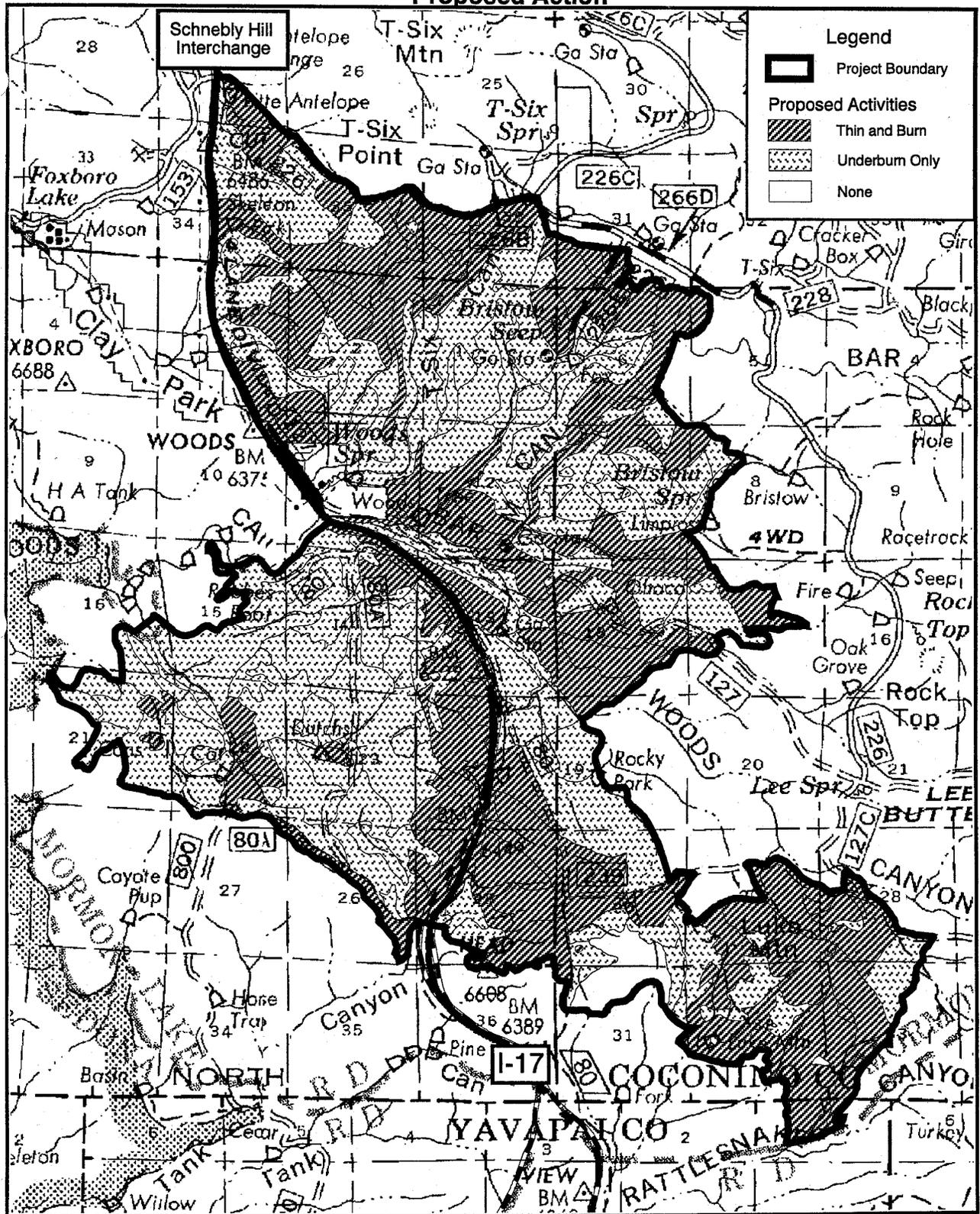
Appeals must be filed with the Regional Forester, Southwestern Region, 333 Broadway SE, Albuquerque, New Mexico 87102, Attention Appeals Contact Person.

For further information, contact myself at the Mormon Lake Ranger District, 4373 S Lake Mary Road, Flagstaff, AZ 86001 (phone 774-1147) or Walker Thornton at the Peaks Ranger District, 5075 N Hwy 89, Flagstaff, AZ 86004 (phone 526-0866).

BRUCE GRECO
Mormon Lake District Ranger
Coconino National Forest

Date

Rocky Park Fuels Reduction Proposed Action



Appendix A

On June 15, 2001 a formal 30-day comment period began for the Environmental Assessment (EA) for the Rocky Park Fuels Reduction Project. One letter was received. In addition, the US Fish and Wildlife Service sent an e-mail asking for clarifications to the Biological Assessment and Evaluation and the EA. All comments and questions are written here in regular type, and the response is in italics. In addition, clarifications to the EA are provided.

Clarifications

In section 3.14 Economics – it states that “We assume that most of the thinning and slash piling will be achieved by either 1) forest service crews and equipment or 2) a contractor. If a contractor is used, the type of contract would be a service contract where the Forest Service pays the contractor for acres treated. Typically salvage rights are given where the contractor can remove cut trees if they choose, but removal is not required.

This paragraph does not preclude the option of using other types of contracts or cooperative agreements to implement the project. If market conditions present an opportunity to sell material we would do so.

In section 2.3 – Alternative A – we describe slash treatments as rough-piling, windrowing and then burning (once it has cured). *Another form of slash disposal that may occur on the project is chipping and hauling, or hauling material away to be chipped. If chipping and hauling occurred it would entail the same or less equipment movement, the same roads and landings as would be used for the thinning or piling currently described in the EA. Chipping and hauling, or just hauling, would not change the short or long term environmental effects of the project.*

In section 2.3 - we describe possible treatment scenarios within bald eagle winter roost stands. *To clarify further, only two situations could occur here. One, roost trees would be individually lined if funding is available. If funding is not available, the entire roost stand will be excluded from burning.*

In section 2.5 – the following clarification is added – *In restricted habitat for MSO, if more than one year elapses between the last survey and treatment, the area will be surveyed for MSO again.*

Comments from Southwest Forest Alliance – July 10, 2001

The Rocky Park project appears to be a well-designed project. The Southwest Forest Alliance has only the few following comments.

As stated in my earlier comments, it would be greatly beneficial to include an analysis of the changes in BA and trees per acre by treatment, not only over the entire project. This is important to understanding the effects of individual thinning methods. Please provide a list of the average residual BA within each treatment type.

Differences in basal area are not as evident by treatment type, rather differences are more tied to stand structure, canopy closure and residual Vegetative Structural Stage (VSS). Because the purpose of this project was fuels hazard reduction, VSS and crown canopy closure were more appropriate methods of measure. The EA summarizes conclusions about effects.

Also stated in my earlier comments, the cutting cap for junipers should be smaller than 12” dbh cutting cap for ponderosa pine. In many cases, a 12: dbh juniper may be relatively old. Additionally, it would be important to retain even small junipers if they are relatively old. Please provide data on the age of the junipers (compared to their size) for the area.

Junipers will be measured at the root collar, not at breast height the way pine is measured. The intent of Alternative A is to cut younger juniper trees that have established themselves over the past 100 or so years of fire suppression. The purpose of removing these trees is to remove ladder fuels and maintain meadows. There will be few 12-inch diameter at root collar junipers cut and most of trees cut will be smaller. Tree rings on junipers are hard to determine because there can be multiple rings in one year. Determining the age-diameter relationship is not warranted for this project.

The openings of 2-5 acres in the 700 acres of Turkey Summer Habitat treatment are rather large. Please provide an analysis of the 700 acres, showing the number, size and distribution of openings.

The analysis described in this comment is not necessary to understand the effects of treatments as required by Forest Service policies. As described in section 2.3 of the EA, openings would occur only on soils suited for turkey summer forage. Design will be closely tied to current openings. Because these will be designed using on-the-ground soil conditions and existing openings, the exact locations are not yet known. The citation noted in the project record related to the desired size of openings is Hoffman, Richard W., et al. 1993. Management Guidelines for Merriam's Wild Turkeys. Division Report No. 18. Colorado Division of Wildlife. 24pp.

The noxious weed treatments focus on control rather than prevention. The plan should include more measures to prevent the continued influx of seeds and the soil disturbance that favors many exotic weeds. For instance, the plan should analyze road closures and closing the area to ORV's. Also, the project should minimize the impacts of soil erosion and spread of exotics by minimizing mechanical treatments and limiting the movement of machines through the project area.

Section 2.5 of the EA describes best management practices related to noxious weeds and soil erosion. The document referenced in the EA (the Three-forest Noxious Weeds Strategic Plan Working Guidelines) contains methods of evaluating the noxious weed situation and taking actions. Strategies will be developed during implementation that fit the type of weed found and the on-the-ground situation. For example, should contractors be used, there will be clauses for cleaning equipment. The current road system, including current maintenance level objectives, will be used for this project. An analysis of the transportation system and update to road maintenance level objectives and off road driving policies are outside the scope of this analysis.

Comments from U.S. Fish and Wildlife Service: 6/29/01

We would like to see the treatment within the bald eagle roost sites to include raking and lining of snags and roost trees before burning in the area due to the thick duff layer around these trees.

See the EA clarification above related to bald eagle roost sites. As stated, the Forest Service intends to protect large yellow pine and snags in bald eagle winter roosts. Budget permitting, we will rake back the thick layers of dead needles to the drip line, line individual trees, clumps or entire stands. If budget is inadequate for this labor intensive effort, we will build line (most often up to an 8 foot dozer line) where roads, vegetative and topographic features are not adequate) around each roost stand and not burn the roost stands.

If more than one MSO breeding season elapses between treatments in restricted and protected habitat, will these areas be re-surveyed for MSO?

See the EA clarification above related to MSO survey. As stated, restricted and protected habitat will be re-surveyed for Mexican spotted owls if more than one Mexican spotted owl breeding season elapses between treatments.

Thinning, slash piling and pile burning in PACs will occur outside the breeding season for MSO if the PACs are occupied. Will PACs be surveyed to protocol each breeding season, before thinning, slash piling and pile burning occur?

Mexican spotted owl breeding season restrictions apply to thinning, slash piling and pile burning in PACs. Surveys to validate non nesting will occur if needed.

Miscellaneous clarifications: There are a total of 98 acres of PACs within the analysis area as opposed to the 120 acres stated in the Biological Assessment and Evaluation dated 3/30/01. This difference is due to a mapping error in our original analysis. Acres within the project area by PAC are: PAC 040518 at 29 acres, PAC 040529 at 26 acres and PAC 040543 at 43 acres.

Location 937 site 6 (35 acres) has been identified as additional target-threshold habitat.

The following was inadvertently omitted from the BAE. Please be advised that 4 acres in PAC 040518 are proposed for thinning, piling and pile burning. As proposed in the other PACs, these activities will occur outside the breeding season if occupied. Surveys to validate non nesting will be conducted if needed. Thinning will be of pine <1-8.9” dbh as per the Recovery Plan and micro habitat monitoring will be conducted according to regional protocol.