

**File Code:** 1950**Date:** March 26, 2024**Route To:****Subject:** National Forests and Grasslands in Texas Wind Event DNA**To:** Friends of the National Forests and Grasslands in Texas

Dear Friends of the National Forests and Grasslands in Texas,

The National Forests and Grasslands in Texas (NFGT) is seeking comments on a proposal to continue the work that was originally authorized under the “National Forests in Texas Wind Event Environmental Assessment” (Wind Event EA) that was completed in 2013 (Attachment 1). The proposed project is named the “National Forests in Texas Wind Event Determination of NEPA Adequacy” (Wind Event DNA). The purpose of the Wind Event EA, which was successfully utilized three times, was to utilize a Condition Based Approach (Schultz and Nie, 2012) to manage and restore areas of the Forest that may be damaged by future large scale wind events such as hurricanes, tornados, and straight-line wind events. The purpose of the Wind Event DNA is the same.

The NFGT is proposing to authorize the continuation of this work through the application of a Determination of NEPA Adequacy (DNA) (Attachment 2).

The DNA process serves to document that appropriate Subject Matter Experts have reviewed, and the Responsible Official has determined that an existing National Environmental Policy Act (NEPA) analysis satisfies NEPA’s requirements for a new proposed action (Attachment 3). In other words, the NFGT is proposing to utilize the NEPA analysis from the Wind Event EA (2013) as the basis for continuing the work, which would be authorized under a new Decision Notice and Finding of No Significant Impact (DN/FONSI).

The DNA process is similar to a Supplemental Information Review (FSH 1909.15, sec. 18), which can be used to “extend” projects, but the DNA allows for greater public participation and results in the issuance of a new Decision Notice which is subject to agency Administrative Review Procedures (i.e., the “Objection” process), 36 CFR 218, Subpart B.

Purpose and Need

The purpose and need of the Wind Event EA (2013) was to restore forest health; restore native ecosystems, including wildlife and threatened and endangered species habitat; reduce hazardous fuel loading; and provide for public access to the Forest and safety following wind events. The Purpose and Need of the Wind Event DNA remains the same, although the NFGT is proposing to modify the acreage limitation and remove the timing limitation.

Wind events such as hurricanes and tornados can weaken, damage, and blow down trees over areas of hundreds to thousands of acres (e.g., Hurricane Laura impacted over 90,000 acres). In such events, the damaged or downed trees may represent the loss of critical habitat for wildlife,



including nesting and foraging habitat for the endangered Red cockaded woodpecker (RCW). Trees can also be left leaning after such events and may eventually die or become more susceptible to insects and diseases, which can further contribute to mortality and hazardous fuel loading, thereby increasing the potential for large, uncontrolled wildfires. These events can also create barriers for the public to access the Forest and safety concerns for those visiting the Forest.

Since the 1850's there have been 66 documented hurricanes affecting the state of Texas. Over the last 25 years, the NFGT has experienced five major and several localized wind events, including hurricanes, tornados, and straight-line winds. In these instances, a rapid management response is not only desirable from a public access and safety perspective, but also essential in terms of meeting the Forest Service mandate to provide for both ecologically and socially sustainable management of forest resources. In these instances, a rapid response is essential, and mandated by policy, for example, for the successful management and recovery of the endangered Red-cockaded woodpecker (RCW). Additionally, a rapid response is essential to utilize commercial sales as a treatment method for restoring forest health and reducing hazardous fuel loading; and, practically speaking, non-commercial methods of treatment are cost prohibitive, far exceeding current and expected agency budgets allocated for this type of work. It typically takes a minimum of 6-months to prepare a standard, stand-alone environmental document for a project following a wind event. By that time, the dead and downed trees have lost sufficient market value that a commercial sale is not possible. By preparing a programmatic environmental document, such as the existing Wind Event EA, before the wind event occurs, with all conditions of treatment outlined, analyzed, and discussed ahead of time, when an event occurs, rapid treatment is possible.

In summary, the purpose of this project is to extend the work of the Wind Event EA through a Determination of NEPA Adequacy (DNA), which will result in the issuance of the Wind Event DNA Decision Notice/Finding of No Significant Impact.

Proposed Action

The Proposed Action of the Wind Event Environmental Assessment (2013) was to treat areas affected by future wind events based on the conditions of the affected area before and after the wind event as described in Table 1. The treatments would vary depending on the Management Area (MA) and the amount of damage to vegetation and other associated resources. The Proposed Action of the Wind Event DNA remains the same.

An assessment of forest resources identified approximately 600,000 acres that would be considered for treatment following a wind event under this Proposed Action. No activities would occur in designated Wilderness Areas (MA-7).

The following instructions pertain to the marking designation of trees with tree marking paint (TMP) for removal:

1. Pine trees leaning at a 30-degree angle or greater. An attempt should be made to leave those trees likely to survive (TMP designation not required).
2. Pine trees leaning greater than 45-degrees are designated for removal by contract provision (C2.53# Designation by Damage Class, Dx/DAM). If doubt exists on degree of lean, designate with TMP.
3. Pine trees that are root sprung. If the tree is leaning less than 45-degrees, designated with TMP.

4. Pine trees with severe crown damage or the crown is totally snapped off (see definition of severe crown damage below). Designate with TMP if leaning less than 45-degrees.
5. Pine trees that have severe trunk damage (i.e., major splits, cracks, breaks). Designate with TMP if leaning less than 45-degrees.
6. Streamside Management Zones (SMZ) associated with Management Area 4 (MA-4), Pine trees falling across the 50-foot edge of the primary zone would be cut off. Only that portion of the tree outside the primary zone would be removed. Leaners, snaps, root sprung, or dead trees that originate within the primary zone would not be removed. Trees outside the primary zone that are leaning into the primary zone could be removed.
7. Within RCW clusters, the designation of trees leaning less than 45-degrees should be coordinated with the District Wildlife Biologist.

The Proposed Action includes a Condition Based Assessment to allow for modification of the proposed treatments if the desired objectives are not being met. Under a Condition Based Assessment we are trying to learn from our current implementation strategy to improve future implementations. This approach is normally applied to specific aspects of a proposed project to evaluate our assumptions and respond by modifying specific actions to achieve the desired outcomes. Additionally, the effectiveness of fuel reduction treatments would be monitored and modified if the desired results are not achieved. Any proposed changes would be within the range of treatments described in Table 1.

Table 1 outlines how each affected area would be treated. After a wind event, the Forest Service would determine the appropriate treatment based on the characteristics of the area impacted. Treatments would be monitored to determine if we are achieving the desired condition and if follow-up treatments or changes in treatments are needed. The treatment of least impact to meet our objectives would be utilized.

To reduce the potential of adverse environmental effects, the Proposed Action includes a variety of project design criteria, including:

1. Only existing and temporary roads would be used. No new road construction would occur.
2. No treatments would occur in RCW clusters during nesting season (April 1 – July 31, subject to change based on site-specific surveys of activity status).
3. Treatments in RCW clusters would follow guidance in the 1996 Forest Plan and the RCW Recovery Plan.
4. Applicable standards and guidelines in the 1996 Revised Land and Resource Management Plan
5. for each Management Area affected would be implemented.
6. No activities would occur with Streamside Management Zones.
7. A minimum of 2 snags per acre would be left within any areas treated within MA-1 and MA-2.
8. On-site biological evaluation will be conducted by appropriate Resource Subject Matter Experts.
9. On-site damage evaluation will be conducted by appropriate Resource Subject Matter Experts.
10. On-site cultural resource survey will be conducted by appropriate Subject Matter Experts.
11. Monitoring of residual course woody debris.
12. Monitoring of non-native invasive plant species (NNIPS). These would be treated in accordance with the current Environmental Assessment for treatment of NNIS (2008).

Table 1: Treatment Table based on resulting wind event conditions. Individual Management Area guidance applies.

Area Condition Description	Damage < 30%	Damage 30-60%	Damage >60%
<ul style="list-style-type: none"> • Low commercial merchantability • Access is limited, • Fuel loading less than .5 ton/ac and/or, • Not adjacent to areas of concern 	Prescribed fire	Prescribed fire	Prescribed fire
<ul style="list-style-type: none"> • Low commercial merchantability, • Access limited, • Fuel loading less than .5 ton/ac and/or, • Adjacent to areas of concern 	Prescribed fire, Lop and Scatter,	Prescribed fire, Lop and Scatter, Mulch, Removal	Prescribed fire, Lop and Scatter, Mulch, Removal
<ul style="list-style-type: none"> • Low commercial merchantability, • Access not limited • Fuel loading between 1 and 3 tons/ac, and/or, • Adjacent to areas of concern 	Prescribed fire, Lop and Scatter, Removal*	Prescribed fire, Lop and Scatter, Removal	Prescribed fire, Lop and Scatter, Removal
<ul style="list-style-type: none"> • Commercially merchantable, • Access limited, • Fuel loading between 1 and 3 tons/ac. 	Prescribed fire, Lop and Scatter, Removal	Prescribed fire, Lop and Scatter, Mulch, Removal	Prescribed fire, Lop and Scatter, Mulch, Removal
<ul style="list-style-type: none"> • Commercially merchantable, • Access not limited, • Fuel loading in excess of 3 tons/acre, and/or. 	Prescribed fire, Removal	Prescribed fire, Removal	Prescribed fire, Removal

* Removal could be commercial or non-commercial removal.

Estimates of fuel loading would be based in part on USDA Forest Fire Science lab research *Photo Series for Estimating Post-Hurricane Fuels in Forest Types of the Southeast United States* described at http://www.fs.fed.us/pnw/fera/research/fuels/photo_series/index.shtml.

We would appreciate your comments on the Proposed Action. Responses should contain the following information:

- Name and address.
- Title of the project for which you are submitting responses.
- Specific facts or information, along with supporting reasons, that the Responsible Official should consider in reaching a decision.

Although comments are always welcome, your comments would be most beneficial if received by April 30, 2024. Comments received in response to this solicitation, including names and addresses of those who respond, will be considered a part of the public record for this project, and will be available for public inspection. Comments submitted anonymously will be accepted and considered. Additionally, pursuant to 7 CFR 1.27(d), any person may request the agency to withhold a submission from the public record by showing how the Freedom of Information Act (FOIA) permits such confidentiality. Persons requesting such confidentiality should be aware that, under the FOIA, confidentiality may be granted only in limited circumstances, such as to protect trade secrets. The Forest Service will inform the requester of the agency's decision regarding the request for confidentiality, and where the requester is denied, the agency will

return the submission and notify the requester that the comments may be resubmitted with or without name and address within seven days.

Submit your responses at the address listed above or electronically in a common digital format such as an email message, plain text (.txt), rich text format (.rtf), or Word (.doc) [insert URL] with Subject: Wind Event EA DNA. Hand-delivered responses may be received during our normal business hours of 8:00AM to 4:30PM, Monday through Friday, excluding federal holidays.

This proposal is listed in the Schedule of Proposed Actions for the National Forests and Grasslands in Texas as the "Adaptive Management EA for Wind Events Determination of NEPA Adequacy." Additional information about the project, including Attachments 1-3, is available for public review at www.fs.fed.usda/gov/main/texas/landmanagement/planning. We value your interest and ideas for managing the National Forests and Grasslands in Texas. We wish to work with you in providing management that better reflects the wishes of the people, the needs of the resources, and the needs of the environment. For additional information concerning this proposal, contact Robert Potts, Natural Resources and Planning Staff Officer at, robert.potts@usda.gov or 936-639-8539.

Sincerely,



KIMPTON COOPER
Forest Supervisor

