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Agriculture

Forest  
Service

May  
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# Draft Record of Decision

## Strategic Community Fuelbreak Improvement Project

**Los Padres National Forest, Monterey Ranger District,  
Monterey County, California**

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## Background

The purpose of this project is to re-establish and maintain historic fuelbreaks at strategic locations in proximity to communities at-risk from wildfire on the periphery of the Monterey District. This project is a result of collaboration between the Forest Service, local stakeholders, and government and non-government organizations through Firescape Monterey. Since 2011, the Forest Service has been actively engaged in Firescape Monterey, a collaborative approach to identify and develop management strategies for local ecological values. The threat of wildland fire to human communities prompted Firescape Monterey to focus on helping communities become fire adapted. Through collaborative learning, the Forest Service has been able to utilize input from local stakeholders as we focus on planning for future wildfire events. With this project, the Forest Service is helping to transform local communities into safe and resilient places to live.

## Decision

I have decided to implement Alternative 4 as documented in the Los Padres National Forest Strategic Community Fuelbreak Improvement Project Final Environmental Impact Statement (FEIS). I reached my decision after reviewing the FEIS, Los Padres National Forest Land Management Plan, project record, and carefully considering public input, tribal consultation and communication with local, state, and other federal agencies.

Alternative 4 consists of the treatment parameters listed below, including Project Design Standards and Mitigation Measures, and Monitoring and Adaptive Management listed in Appendix A & B of this Record of Decision (ROD).

Alternative 4 will re-establish and maintain approximately 24 miles (~542 acres) of historically used fuelbreaks, all of which originated as firelines, within the wildland urban interface threat zones on National Forest System lands. Establishment and maintenance of fuelbreaks will include removal of medium (light brush and small trees) and heavy (dense brush) fuels, leaving a vegetative ground cover of grass, forbs, and small shrubs, with the existing overstory intact.

### In Wilderness:

Re-establish and maintain approximately 10.4 miles (~169.4 acres) of historically used fuelbreaks in the Ventana Wilderness (Table 1).

Wilderness fuelbreak maintenance will occur every 3-5 years through a combination of manual treatments utilizing traditional tools and handheld motorized tools for cutting vegetation, piling and pile burning.

To determine the minimal tool in wilderness, a Situational Report will be prepared for each wilderness fuelbreak segment following adaptive management criteria (see Appendix B of this ROD).

Table 1. Wilderness Fuelbreaks

<b>Wilderness Fuelbreaks</b>		
Fuelbreak Segment	Length in Miles	Maximum Feet Width
Skinner Ridge – Devils Peak	1	150
Skinner Ridge	2.2	150
Post Summit – Little Sur River	1.8	150
Mount Manuel – Big Sur Wild River Boundary	0.9	150
Hennicksons Ridge – Tassajara Road	4.5	150

In Non-Wilderness:

Re-establish and maintain approximately 13.6 miles (~371.3 acres) of historically used fuelbreaks on non-wilderness lands (Table 2).

Non-wilderness fuelbreak maintenance will occur every 3-6 years through a combination of manual thinning with handheld motorized tools and chippers, mastication with excavators, and herbicide. Material not masticated or chipped, will be piled for burning manually or with excavators.

The herbicide Tricolpyr butoxyethyl ester (BEE) [Garlon® 4 Ultra or an equivalent] mixed with modified seed oil at a 50:50 ratio is authorized on non-wilderness lands only and applied to freshly-cut stumps and stubs as soon as possible, preferably within 1 hour after cutting. Application will be restricted to low-volume hand-held spray equipment with direct spray, wick or brush applicator.

Prescribed fire will be used to treat approximately 64.7 non-wilderness acres between the Chews Ridge Lookout Tower and the Monterey Institute for Research and Astronomy (MIRA).

Table 2. Non-wilderness Fuelbreaks

<b>Non-Wilderness Fuelbreaks</b>		
Fuelbreak Segment	Length in Miles	Maximum Feet Width
Botchers Gap – Skinner Ridge	1.3	150
Lower Skinner – Pico Blanco Boy Scout Camp	0.6	150
Mescal Ridge	0.6	300
Post Summit – Manuel Peak	2.7	150
(NCRR) Terrace Creek Trailhead – Cold Springs	3.5	150
(NCRR) Cold Springs – Tan Bark Trail	1.5	300
(NCRR) Tan Bark Trail – Anderson Peak	1.1	150
Partington Ridge	0.8	150

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Tan Bark Trail	0.8	From NCRR west: first 600 feet in length will be 300 feet wide; remaining length will be 150 feet wide
Chews Ridge Lookout – Wilderness Boundary	0.7	150

NCRR: North Coast Ridge Road

### Decision Rationale

My decision to authorize the Strategic Community Fuelbreak Improvement Project is based on my goal to take proactive actions to keep wildfires burning on the national forest from entering the wildland urban interface. Although we do not know with certainty where or when the next wildfire will occur, this project is a prudent investment in wildfire preparedness.

My rationale for choosing the selected alternative is based on meeting the purpose and need with careful consideration of those issues and concerns addressed during the environmental review process.

### Relevant Law, Policy, and Land Management Plan Direction

In the 1967 Ventana Wilderness Suitability Report, the Chief of the Forest Service and the Secretary of Agriculture recognized that the Ventana Wilderness had a history of wildfires and that “adequate fire protection” would be essential. This has proven to be prophetic and is why Congress provided legislative special provisions allowing for wildfire pre-suppression and suppression measures in subsequent Ventana Wilderness additions. Although maintaining fuelbreaks in wilderness is not consistent with wilderness values, I recognize that wilderness boundaries are adjacent to at-risk communities and there is a history of utilizing the same strategic ridgelines in the Ventana Wilderness for fuelbreaks. I believe that maintaining fuelbreaks in a non-emergency environment, following design standards to protect the resources, is preferred to repeated re-opening of historical firebreaks during an emergency with mechanized equipment.

Design standards and mitigation measures have been carefully crafted to minimize effects on all resources, in particular wilderness resources, in compliance with Forest Service wilderness management policy (Forest Service Manual 2320). Based on the repeated use of the same fuelbreaks over the last four decades and their effectiveness, I believe this project is also permissible ‘by exception’ for fuelbreaks in wilderness as defined in the Los Padres National Forest Land Management Plan (LMP part 2, pg. 5).

### Community Protection

Big Sur, Palo Colorado, Cachagua, and Jamesburg are four communities adjacent to National Forest System lands that are at-risk from wildfires. In 2013 and 2008, 34 and 27 homes respectively were lost to wildfire in these communities. The recent 2016 Soberanes Fire destroyed an additional 57 homes.

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Recognizing the risk to communities from wildfire, the Forest Service has engaged collaboratively with local stakeholders through Firescape Monterey to help focus and prioritize our fire management practices. My decision is a result of collaborative engagement at the community level and will improve our effectiveness and efficiency in protecting communities from wildfires.

### Health and Safety During Implementation

Ensuring safety and risk management are one of my primary concerns when authorizing the implementation of projects. There are inherent safety risks associated with maintaining fuelbreaks with either hand or motorized tools. Site conditions vary from gentle slopes with low vegetation densities to steep slopes with dense or tall shrubs. Concurrent safety concerns are hazard trees, exposure to the ambient weather, and fatigue. Second to safety, the Forest must also consider efficiency in the expenditure of funds and personnel time.

In wilderness, commenters suggested strict compliance with the Wilderness Act by using non-motorized tools to reduce impacts on wilderness character. In evaluating this project, I have considered both wilderness character and safety in my alternative selection. As detailed in the alternative description and utilizing Monitoring and Adaptive Management (Appendix B of this ROD), traditional tools in wilderness will be emphasized with the option to use handheld motorized tools for reasons of safety, available crews, ability to implement the project within reasonable timelines considering time constraints, efficiency, and the need to implement fire-risk reduction strategies as soon as possible.

The ability to factor in safety and efficiency when selecting tools, or the combination of available tools, is why I selected Alternative 4. The selected alternative meets our obligation to mitigate job hazards by establishing procedures and practices that help prevent accidents and injuries.

### Resource Protection

Repeated use of bulldozers to reopen historical firelines has resulted in scaring that is visible to both wilderness and non-wilderness visitors. Each time one of these strategic firelines is opened during an emergency event, the impact on the resources is compounded. My decision will provide a proactive approach to reducing the reliance on mechanized equipment and subsequently reduce the adverse fire suppression impacts on the landscape.

By including an extensive list of Project Design Standards and Mitigation Measures developed by an interdisciplinary team of resource specialists (Appendix A of this ROD), I am assured that all resources will be protected to the fullest degree possible.

### Use of Herbicides

Because of the rapid growth of brush on the Monterey District, fuelbreak maintenance is scheduled for every 3-5 years. To increase the time between maintenance, public comments suggested the use of herbicides to retard the regrowth of brush. After review, the interdisciplinary team predicted that the use of herbicides will extend the time between

maintenance cycles by at least one year (up to approximately 6 years). Over the long-term, this is a significant increase in efficiency and a reduction of equipment and personnel costs.

After review of both the human health and environmental risk assessments in the FEIS, I am confident that the combination of application method and Project Design Standards for herbicide application (Appendix A of this ROD) will ensure that people and the environment are protected from potential harmful effects.

#### How Alternative 4 meets the Purpose and Need

The purpose of this project is to re-establish and maintain fuelbreaks at strategic locations in a condition such that they limit the spread of wildfire by providing a strategic and tactical advantage for both ground-based and aerial firefighting personnel and equipment. The project is necessary because:

1. There is a need for increased wildland fire suppression efficiency near communities and infrastructure.

The selected alternative meets this need by: reducing surface fuels along historically used strategic ridgelines, lowering flame lengths and fireline intensities; retardant coverage will be more efficient because of less vegetation to cover; production rates for improving the fuelbreak will increase because of lighter fuels and points of access and travel for ground-based firefighters. The lighter fuels also provide opportunities for indirect fireline construction through backfire or burn-out operations.

2. There is a need to reduce the wildfire risk to the life and property in the communities of Big Sur, Palo Colorado, Cachagua, and Jamesburg.

The fuelbreaks are strategically located adjacent to areas of high fire threat and high risk (FEIS p. 61-65), providing established access and control features. This will allow for a faster and increased suppression response during initial attack. The selected alternative offers the greatest number of treatment methods which translates into expedited establishment of these vital fuelbreaks.

3. There is a need for reduced suppression costs within the wildland urban interface (WUI).

The emphasis of this project is providing proactive strategies to keep wildfires out of the WUI environment. WUIs are the primary source of escalating federal wildfire fighting costs (FEIS p. 99-100).

4. There is a need to minimize adverse impacts from fire suppression activities on the landscape.

The proposed fuelbreaks have been designed by an interdisciplinary team of relevant specialists. Establishing fuelbreaks in a non-emergency environment and following the prescribed design standards provides for ecological conditions and processes to recover to a much greater extent than the current situation of repeated bulldozer use allows.

## How Alternative 4 Responds to Significant Issues

Compared to the other alternatives, Alternative 4 balances the effects to wilderness character, as explained below.

Both the Forest Service and the public have been concerned about the impacts on wilderness character by the repetitive use of bulldozers during fire suppression. The Wilderness Act mandates agencies to preserve wilderness character and manage wilderness land to preserve its natural conditions.

The FEIS analyzed the effects of the project on preserving the Ventana Wilderness character. The analysis followed an accepted protocol that used four statutory qualities of wilderness derived from the definition of wilderness in the 1964 Wilderness Act. The analysis concludes that the selected alternative presents the lowest impact on wilderness character (FEIS Tables 3-6).

Although there will be ongoing manipulation of vegetation, the impacts will be limited to approximately 169 site-specific acres and will have a minor impact on the 236,860-acre Ventana Wilderness as a whole (less than one tenth of 1%). Work-crews will spend the least amount of time (compared to Alternatives 2 & 3) operating in wilderness, minimizing impacts on the untrammelled wilderness quality and wilderness solitude or primitive unconfined recreation. Over the long-term this project will improve wilderness character over the current conditions by implementing design standards to restore the historic dozer lines to a more natural appearance and reducing or eliminating the need for future use of bulldozers in wilderness.

## Other Factors Considered

Fuelbreak Effectiveness: Fuelbreaks play a vital role in suppressing wildfires on the Los Padres National Forest. It is well documented how these ‘historically used fuelbreaks’ have been successful in containing all notable fires on the Monterey District since 1972 (FEIS Table 1). History on the Monterey District tells us that the most effective use of fuelbreaks is through burn-out (back-fire) operations. The fuelbreaks will be established within the same parameters as the historically effective fuelbreaks.

The effective use of fuelbreaks as a fire control feature is often connected to the timing of suppression actions. The fuelbreaks will facilitate fire suppression operations, rather than to act as the sole feature for suppression without need of any other action. Fuelbreaks improve firefighter access and enhance fireline production rates. During direct attack, air tankers and helicopters can support ground firefighters to effectively control fire spread along established fuelbreaks. The lighter fuels associated with fuelbreaks also provide opportunities for indirect fireline construction through back-fire operations; the tactic used most often on these historic firelines.

Cost: This decision reflects my fiscal responsibility and the Forests’ ability to implement this project. The maintenance costs under Alternative 4 are roughly one-half the cost for either Alternative 2 or 3.

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Efficiency: Under the selected alternative, I am providing the largest suite of available treatment methods allowing for the most efficient means to implement this project, both in and outside of wilderness.

Building a Cohesive Strategy: By authorizing this project, I am reassuring the affected communities that the Los Padres National Forest is committed to collaborative engagement at the community level, helping advance fire-adapted communities, and improving our effectiveness and efficiency in responding to wildfires.

### Staying Effective Over Time Through Monitoring

To ensure we meet project objectives and implement design standards and resource protection measures over the life of the project, my decision includes required monitoring and allows for adaptive management (Appendix B of this ROD).

### Public Involvement

A Notice of Intent (NOI) to prepare an Environmental Impact Statement for the Strategic Community Fuelbreak Improvement Project was published in the Federal Register on December 28, 2012. The NOI announced that scoping comments on the proposed action would be received for 45 days from the date of publication. In addition, as part of the public involvement process, the Forest Service hosted three public meetings to provide the public with an opportunity to engage with the Forest Service in discussions regarding the proposed action and the National Environmental Policy Act process:

- ✓ December 4, 2012, 5:30pm – 7:30pm at the U.S. Forest Service Monterey District office in King City.
- ✓ December 6, 2012, 5:30pm – 7:30pm at the U.S. Forest Service Big Sur Station in Big Sur.
- ✓ January 7, 2013, 5:30pm – 7:30pm at the Cachagua General Store and Restaurant in Cachagua.

Issues identified from scoping were centered on the effects to wilderness character (FEIS pages 11-12). To compare effects on wilderness character among alternatives, the FEIS identified specific indicators for each wilderness quality and applied relevant measures (Tables 3-6).

The Draft Environmental Impact Statement (DEIS) was published and made available to the public for review and comment from January 27, 2017 to March 13, 2017. Two public meetings were held to discuss the DEIS and the public review process. One meeting was held in Big Sur on February 15, 2017 and the other at the Monterey District office in King City on February 16, 2017. During the 45-day comment period the Forest Service received 23 unique comment letters and/or emails from individuals, and both non-government and government organizations. Responses to those comments are appended to the FEIS.

## Alternatives Considered

In addition to the selected alternative, I considered three other alternatives which are discussed below. A more detailed comparison of these alternatives can be found in the FEIS on pages 13-23.

1. Under the No Action (Alternative 1) no fuelbreaks would be re-established or maintained to accomplish the purpose and need. During wildfire emergency response, fireline construction would likely continue with heavy equipment along the strategic ridgelines.
2. The Proposed Action (Alternative 2) would re-establish and maintain 24 miles (approximately 542 acres) of historically used fuelbreaks, all of which originated as firelines, extending inside and outside of designated wilderness. Non-wilderness treatments include a combination of handheld motorized tools, mastication, machine or hand piling, and prescribed fire. Wilderness treatments include a combination of handheld motorized tools and traditional tools: handheld motorized tools for initial re-establishment, then traditional tools only for maintenance. This alternative includes a monitoring plan that will assess the project over time and identify any necessary management adjustments.
3. Alternative 3 is a non-motorized wilderness treatment alternative. It is the same as the Proposed Action with the exception that all wilderness treatments would utilize traditional handtools only.
4. The Preferred Alternative (Alternative 4) is the same as the Proposed Action with exceptions: herbicide treatment would be allowed on non-wilderness fuelbreaks, and traditional handtools will be emphasized in wilderness with the option to use handheld motorized tools for both re-establishment and maintenance.

## Environmentally Preferred Alternative

By selecting Alternative 4, I am also selecting the environmentally preferred alternative. Alternative 4 provides a multi-method approach to implementation, allowing the Forest to select the appropriate treatment methods (i.e. tools or equipment) considering efficiency and resource protection. In wilderness, in contrast to Alternatives 2 and 3, Alternative 4 results in the least number of work-crew entries and work-days in wilderness (FEIS Tables 3 & 6).

## Findings Required by Other Laws and Regulations

In reviewing and evaluating all of the supporting documents, my decision is consistent with all laws, regulations, and agency policy relevant to this project.

## National Forest Management Act

The National Forest Management Act (NFMA) requires projects to be consistent with the Land Management Plan (16 USC § 1604(i)). The Los Padres National Forest Land Management Plan (LMP) consists of three interrelated parts. Part 1 is the vision for the Forest expressed through Goals and Desired Conditions. Part 2 establishes suitable uses through Land Use Zones. Part 3 contains mandatory standards that apply to site-specific projects. The following abstracts provide the key components that I considered in my decision.

### LMP Part 1

The goal and desired conditions of this project (FEIS p. 7) are consistent with the LMP. Specifically, Goal 1.1: To improve the ability of communities to limit loss to life and property and recover from wildland fires; LMP Desired Condition: To have vegetation treated to enhance community protection, improve firefighter opportunities for tactical operations and safety near structures, and work together with local jurisdiction and citizen groups to mitigate hazardous fuel conditions in areas surrounding urban interface.

### LMP Part 2

The Land Use Zones suitable for fuelbreaks are displayed in the LMP Part 2, Table 2.3.4. All proposed fuelbreak locations are 'suitable'. In wilderness, fuelbreaks are suitable by exception. I believe the historical and expected use of the proposed fuelbreaks to protect communities (FEIS Table 1) constitutes an exception.

### LMP Part 3

The fuelbreaks have been designed to meet LMP Scenic Integrity Objectives (FEIS Chapter 3, Scenery Analysis) and project implementation includes site-specific Scenery Design Standards (Appendix A of this ROD).

### Endangered Species Act

Wildlife and fisheries biologists have evaluated Alternative 4 with regards to threatened and endangered species. Their findings are summarized in Chapter 3 of the FEIS. Biological Assessments were prepared to determine the effects on the California condor, California red-legged frog, California tiger salamander, marbled murrelet, Smith's blue butterfly, and the South-Central California Coast steelhead. Consultation with the U.S. Fish and Wildlife Service (USFWS) and National Oceanic and Atmospheric Administration (NOAA) Fisheries were completed and they have concurred with our determinations that the project is not likely to adversely affect any threatened or endangered species.

### Migratory Bird Treaty Act

Techniques and protective measures incorporated into Project Design Standards will minimize risks to migratory birds consistent with the MOU between the Forest Service and USFWS.

### Wilderness Act

Chapter 3 of the FEIS identifies the Ventana Wilderness legislative special provisions authorizing the Forest Service to "take such measures as are necessary in the control of fire, insects, and diseases, subject to such conditions as the Secretary deems desirable". Also included, are excerpts from the House Report 98-40 in 1984 reiterating the fire provisions of the Wilderness Act in Section 4(b)(2). In summary, the Wilderness Act and Ventana Wilderness legislative provisions permit the Forest Service to utilize pre-suppression measures necessary to control wildfire.

### Clean Water Act

Implementation of Alternative 4 is expected to improve watershed conditions by reducing the amount of bulldozer-created fuelbreaks during future wildfire events. The project has incorporated Land Management Plan standards designed to protect water quality and Best Management Practices in accordance with Forest Service policy for water quality protection.

### National Historic Preservation Act

Pursuant to the State Historic Preservation Act, inventory, evaluation, and protective measures for areas of potential effects from the project has been completed. Tribal government consultation and coordination has also been completed (FEIS Chapter 3).

### Environmental Justice

Executive Order 12898 requires federal agencies to identify and address any adverse human-health and environmental effects of agency programs that disproportionately impact minority and low-income populations. This project does not disproportionately impact human populations. If anything, nearby populations would benefit from the reduced wildfire risk.

### Administrative Review/Objection Provisions

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 timely project-specific written comments during any designated opportunity for public comment (36 CFR 218.5). Issues raised in objections must be based on previously submitted comments unless based on new information arising after the designated comment periods. Individuals or representatives of an entity submitting comments must sign the comments or verify identity upon request.

Objections must be submitted within 45-days following the publication of the legal notice announcing availability of the FEIS and draft ROD in the Santa Barbara News-Press, the newspaper of record for this project. The date of this 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: Strategic Community Fuelbreak Improvement Project; 1323 Club Drive, Vallejo, CA 94592. Ph. (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). Comments sent electronically must be in .doc, .pdf, .rtf, or .txt formats and sent to: [objections-pacificsouthwest-regional-office@fs.fed.us](mailto:objections-pacificsouthwest-regional-office@fs.fed.us) with the subject: Strategic Community Fuelbreak Improvement Project.

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

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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 as per 36 CFR 218.8(b). Names of objectors will be part of the public record subject to the Freedom of Information Act.

### Implementation Date

When the objection filing period has ended and responses have been made to any objections by the Reviewing Officer, the Responsible Official may make a final decision on the project. The Reviewing Officer shall issue a written response to any objectors within 45-days following the end of the objection filing period (36 CFR 218.26(b)). If no legitimate objections are filed, a decision can be made on the 5th business day following the close of the filing period (36 CFR 218.12). Implementation may begin immediately after the decision is made.

### Contact

For additional information concerning this decision, contact Nic Elmquist, Prescribed Fire & Fuels Specialist at 805-968-6640.

### Signature

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KEVIN B. ELLIOTT  
Forest Supervisor  
Los Padres National Forest

Date

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## Appendix A: Project Design Standards and Mitigation Measures

### Air Quality

1. Prescribed burning will comply with permissive burn days in the Air Sub-Basin as declared by the local Air Quality Management District.
2. All prescribed burning will apply Best Available Control Measures (U.S. EPA, 1992).

### Botany

1. No burn piles will be constructed and no mechanical activities (including mastication) will occur within 50 feet of Forest Service sensitive plant species populations unless otherwise noted.
2. No herbicide application will occur within 10 feet of any documented Forest Service sensitive plant species populations or host plants for the endangered Smith's blue butterfly.
3. Hand treatments (not including herbicide application) would be allowed through Arroyo Seco bushmallow (*Malacothamnus palmeri* var. *lucianus*) occurrences with the presence of a botanical monitor. Otherwise, occurrences would be flagged and avoided with a 50-foot buffer.
4. If new Forest Service Sensitive plant occurrences are discovered prior to or during implementation, botanical staff will be notified, and the aforementioned features will apply.

### Weeds<sup>1</sup>/Invasive Plant Species

1. Mechanical activity (mastication, machine piling) and pile burning will not occur within 50 feet of high priority invasive plant populations. Where possible, mechanical activity and pile burning will also avoid moderate priority species when fuel treatment objectives can still be met. See SCFIP Project Invasive Weed Risk Assessment for definitions of 'high' and 'moderate' priority species.
2. Under all action alternatives, French broom (*Genista monspessulana*) occurrences within the proposed fuelbreaks will be cut with handheld tools (motorized or not). Other alternative-specifics for French broom:
  - a. Non-wilderness areas: Herbicide will be applied to the cut stems to prevent regrowth.
  - b. Cut plants as late as possible in the summer season when soil moisture is at its lowest to reduce possible resprouting.
  - c. Cut materials may be left on site if the plants are not seeding. If plants are seeding, material will be moved to appropriate offsite locations for decadence or burning. While moving, cover with tarps as needed to avoid spreading mature seed to uninfested areas.
  - d. Sites where French broom was treated should be monitored for re-treatment for a minimum of 2 years. Sites where cut French broom material was burned (i.e. burn

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<sup>1</sup> State listed noxious or other nonnative invasive plants that threaten the desired plant community

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piles) should be monitored for a minimum of 2 years for new occurrences and treated via hand pulling or other appropriate methods provided by a qualified weed specialist if new seedlings are discovered.

3. Staging areas for equipment, materials, or crews should be limited to previously disturbed areas as much as possible. Areas with infestations of priority weeds should be avoided to minimize the spread of weed seed to the extent feasible.
4. New invasive plant infestations discovered in the project area before or during project implementation would be evaluated by appropriate staff for prevention and control measures.
5. All vehicles and equipment will be washed to remove accumulations of soil and plant parts before they enter or leave the National Forest and/or prior to moving from one fuelbreak segment to another.
6. To prevent spread of the pathogen that inflicts Sudden Oak Death, personal gear, particularly boots, will be cleaned to remove accumulations of soil and plant parts before they enter the project area and prior to leaving the project area.
7. To prevent spread of pathogen that inflicts Sudden Oak Death, chain saw bars will be cleaned and sprayed with Lysol® to disinfect the cutting surface. Wood chips and organic matter should be removed from the saw. Hand tools will be cleaned and disinfected in a similar manner; all of the above before they enter the project area and prior to leaving the project area.

### Required Monitoring

Monitor for new noxious weed populations before, during, and after project activities. Populations of *Genista monspessulana* that were treated by hand cutting or herbicide application should be revisited for a minimum of two years post-treatment to assess population conditions including post-disturbance sprouting. Where new individuals are discovered, weeds will be removed and or treated to prevent establishment.

### Heritage Resources

#### Required Monitoring

Known cultural resource sites will be flagged for avoidance and monitored by a qualified archaeologist.

### Herbicides

1. Signs will be posted at public access points to treatment areas prior to initiating herbicide treatment. Signs will list herbicides to be used, activity dates, and name and phone number of Forest contact. Signs will be posted a minimum of 24 hours post treatment.
2. Herbicide will not be applied within 10 feet of surface water, seeps, springs, or wet meadows. BMP
3. Do not apply herbicide during rain events or within 24 hours before or after a rain event. BMP
4. Do not apply herbicide with spray applicator if wind speed is greater than 10 mph.
5. Non-target plants will be avoided during all aspects of herbicide application.

6. Use the least amount of herbicide to achieve efficacy.
7. Apply herbicides according to label directions and applicable legal requirements. BMP
8. Herbicides will only be applied by trained and/or certified applicators in accordance with label instructions and applicable federal and state pesticide laws.
9. Follow the Pesticide Safety and Spill Plan, and the Procedures for Mixing, Loading and Disposal of Herbicides (FEIS Appendix P). BMP
10. Manage and store chemicals in accordance with all applicable Federal, State, or local regulations, including label directions. BMP
11. Store chemicals in their original containers with labels intact.

### Hydrology and Soils

1. Table 3 below, lists the protocol for determining operability of soils with equipment based on soil moisture at 4 to 6-inch depth. The table will be used to determine when masticators or other heavy machinery might be used based on soil moisture conditions. If masticators have high ground pressure tires (greater than 6 pounds per square inch), they should not be used on soil conditions described in the heavily bordered table cells. If masticators have low ground pressure tires (less than 6 pounds per square inch), they may be used on soil conditions described in the shaded table cells. BMP
2. A minimum of 40-60 percent soil cover should be retained on soils that have a severe to very severe erosion hazard rating. A minimum 30 percent cover should be retained on all other soils. BMP
3. Plan prescribed fire to ensure that fire intensity and duration do not result in detrimentally burned soils. Whenever feasible, plan prescribed fire (under-burning, and pile burning) when soils contain moisture and fuels are dry to decrease damage to soils. BMP
4. Treatments within known geologically sensitive areas will be field-reviewed and the treatment prescription refined as needed by an earth scientist and fuels officer. A minimum 50-foot equipment exclusion buffer would be flagged above the crown or head of active or potentially active landslides or modified based on geoscientist site-specific evaluation. BMP
5. Allow temporary refueling and servicing only at approved locations, located well away from waterbodies. BMP

Table 3. Protocol for determining operability of soils based on soil moisture at 4 to 6-inch depth<sup>2</sup>

Soil Moisture Percent Increases Downward	Coarse Soils Loamy sands, fine sandy loam, very fine sands, coarse sands	Light Soils Fine sandy loams, sandy loams, very fine sandy loam	Medium Soils (<35% clay), Sandy clay loam, loam, silt loam, sandy clay loam, clay loam	Heavy Soils (>35% clay), Clay loam, sandy clay, silty clay loam, clay
<b>Dry soils</b>	Dry, loose, single grained, flows through fingers.	Dry, loose, flows through fingers.	Powdery, dry, sometimes slightly crusted but breaks down into powdery conditions.	Hard, baked, cracked sometimes has loose crumbs on surface.
<b>Slightly moist soil</b>	Still appears dry, will not form a ball with pressure.	Still appears to be dry; will not form a ball.	Somewhat crumbly, but will hold together from pressure.	Somewhat pliable; will form ball under pressure. At plastic limit.
<b>Moist soil</b>	Still appears dry, will not form a ball with pressure.	Tends to ball under pressure but seldom will hold together.	Forms a ball and is very pliable, sticks readily if high in clay.	Easily ribbons out between fingers, has a slick feeling. At plastic limit.
<b>Very moist soil</b>	Tends to stick together slightly, sometimes forms a very weak ball.	Forms a weak ball breaks easily, will not stick. Plastic limit or nonplastic.	Forms a ball and is very pliable, sticks readily if high in clay. Exceeds plastic limit.	Easily ribbons out between fingers, has a slick feeling. Exceeds plastic limit.
<b>Wet soils</b>	Upon squeezing, free water may appear. Wet outline is left on hand. Nonplastic.	Upon squeezing free water may appear. Wet outline left on hand.	Can squeeze out free water. Wet outline left on hand.	Puddles and free water forms on surface. Wet outline left on hand.

### Pile Burning

1. Locate burn-piles in open-canopy areas within the fuelbreak to avoid damage to the overstory when piles are burned.
2. Burn piles will be located on roads (new or old) or previously disturbed sites, when available.
3. Burn piles should not exceed approximately fifteen feet in width, to minimize disturbance to the soil structure and encourage quick recovery of vegetation.
4. Burn piles will not be built on small mammal burrows, to avoid impacts to federally listed amphibian species that utilize small mammal burrows.
5. After burning, mulch the burn-site to reduce the risk of weed colonization.

### Prescribed Fire

1. Develop burn objectives that avoid or minimize creating water-repellent soil conditions to the extent practicable considering fuel load, fuel and soil moisture levels, and burn intensity. BMP

<sup>2</sup> Use this protocol by digging a small pit and sample 4 to 6 inches below the mineral soil surface. Determine soil texture (coarse, light, medium, or heavy soils) to identify soil texture in table. Collect enough soil to form a 1-2-inch ball by molding with hand pressure. Pick out excess rock fragments & squeeze with sic directional squeezes. If ball hold together under repeated tosses (1-2 feet into air) then the soil is too wet for equipment operation.

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2. Set target levels for desired ground cover remaining after burning based on slope, soil type, and risk of soil movement.
3. Plan burn areas to use natural or in-place barriers that reduce or limit fire spread, such as roads, barren or low fuel hazard areas, where practicable, to minimize the need for fireline construction.
4. Scatter burned slash on control lines to reduce the color contrast of the exposed soil.

### Recreation

1. To mitigate effects on opportunities for solitude, minimize work activities near Forest Developed Trails on weekends and holidays. During project implementation, visitors will be notified of activities occurring in the area and provided information on options for traveling in other unaffected areas.
2. Large snags will be retained in fuelbreaks as legacy trees when not posing a safety risk to future firefighting operations.
3. Where possible, to reduce visual disturbance, if staging areas, base camps, or other areas of concentrated use are necessary, establish these areas outside of wilderness and out of sight of visitor use areas.

### Scenery

To minimize changes to the natural scenic character and improve or maintain the landscape's scenic integrity, the following scenery design features are required:

#### *Project Wide*

1. Design fuelbreaks in forests to be open, averaging no more than 40% crown closure along the center corridor (LMP Vegetation Management Standard S4).
2. Minimize changes to the natural scenic character by mimicking the natural pattern of the scenic character to be more open on ridgelines with denser vegetation along drainages while meeting fuel reduction objectives.
3. Reduce or eliminate deviations in form and line by maintaining irregular, free-form edges that relate to the topographic forms of the land and flow with the contours, following the natural lines of the ridges, drainages and rock outcrops.
4. Blend treated areas into the natural landscape by incorporating existing landscape features such as natural openings and rock outcrops into fuelbreak layout.
5. The fuelbreak is to be of varying widths along the ridgeline where possible, rather than of equal width on either side of the ridgeline to avoid unnatural-looking lines in the landscape.
6. Blend all treated areas into the existing downslope vegetation through the creation of a transition zone along the edges of the fuelbreak. The transition zone shall consist of a gradient of less dense vegetation within the fuelbreak and gradually increasing density beyond the fuelbreak edges to blend into existing vegetation. Width of the transition zone would be determined by the slope and existing density of vegetation and would be sufficient to eliminate any unnatural-appearing straight lines along the fuelbreak edge.

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7. Undulate the fuelbreak edge horizontally and keep a diverse height of leave-trees (both green and snags) vertically within the transition zone to reduce visual contrasts between treated and non-treated vegetation.
8. Retain randomly sized and randomly distributed islands and peninsulas of vegetation within the fuelbreak to provide a natural appearance while meeting fuel reduction objectives. Precaution would be taken to prevent scarring of leave-trees by equipment.
9. Unit boundary marking on trees will be temporary and visible only on the opposite side of the tree from where it could be seen from roads, trails and recreation sites.
10. Conifer stands will be thinned to a random spacing pattern of approximately 20 feet between trees, removing only trees less than 8” DBH.
11. Hardwood stands would be thinned to a random pattern spacing of approximately 20 feet between trees, removing only trees less than 4” DBH.
12. Limb leave-trees up to 6-10 feet high; limbs greater than 10 inches will be retained for their visual character.
13. All pruning cuts will be made as close as possible to the trunk without cutting into the branch collar or leaving a protruding stub.
14. To reduce visual disturbances, flush cut stumps within 4 inches of the uphill side of the stump where practicable. In wilderness, flush cut stumps within the first 75 feet of the visible foreground from trails.
15. Where needed, spread slash as a mulch over existing dozer scars and other areas of exposed mineral soil to cover the contrasting color of the soil.
16. To avoid unnatural-looking patterns in the landscape, burn piles would be piled in irregularly shaped piles so as to not leave a circular burn footprint. Locate burn piles in irregularly spaced intervals and do not build piles in straight lines.

### Wilderness

1. To maintain the undeveloped wilderness quality, work crews will utilize Leave No Trace practices.
2. To maintain the undeveloped wilderness quality, temporary base camps and use trails created during the project will be restored to previous conditions.
3. To maintain opportunities for solitude, notify visitors of activities occurring in the area and provide information on options for traveling in other unaffected areas of wilderness.
4. When possible, to maintain opportunities for solitude, avoid scheduling trail maintenance and fuelbreak activities concurrently.
5. Once a Situational Report is completed, the Forest will announce in a press release the location and projected time-period implementation will occur.

### Wildlife

Designs that are applicable across all treatment units are described below. Fuelbreak segments that require additional site-specific protective measures are described and categorized separately.

*Project-wide*

1. Within one week of activities, the Ventana Wildlife Society will be contacted to determine if condors are utilizing habitat in the vicinity. If so, measures will be taken to ensure that noise, pile burning activities, and smoke do not affect condors or nesting activities. If condors approach the work site and remain on the scene, the Ventana Wildlife Society will be notified in order to avoid harassment of condors.
2. If a condor nest or roosting area should be reported by the Ventana Wilderness Society prior to project implementation, no activities will take place within a 1.5-mile buffer of the nesting areas, as per Land Management Plan direction (S28, S24, S11)<sup>3</sup>.
3. Prior to implementation, there will be coordination between implementers and condor biologists from the Ventana Wildlife Society for the identification of large snags that may be currently or potentially used by condors, to avoid the inadvertent removal of important roosting structures.
4. Prior to implementation, work crews will be advised on the appropriate ways to park and care for equipment and tools when working in occupied condor habitat in order to avoid impacts to condors from the ingestion of harmful substances or objects that may be associated with implementation tools/equipment.
5. To mitigate effects to migratory and resident birds within their nesting habitat during their sensitive reproductive season, in areas of brush treatment and prescribed fire, it is recommended to avoid implementation from March 15 through July 31.
6. No ground disturbing activities will occur within 100 feet of creeks, springs, or ponds to avoid direct impacts to species associated with riparian/aquatic habitat, such as California red-legged frogs. BMP
7. Where possible and not affecting the integrity of the fuelbreak, large snags that have been felled for safety reasons will be left on the landscape as large down logs (i.e. not removed or bucked up), as per Land Management Plan direction (S14).

*Fuelbreak Segments: ‘Mt. Manuel to Big Sur Wild River’, ‘Post Summit to Little Sur River’, ‘Bottchers Gap to Skinner Ridge’, ‘Mescal Ridge’, and ‘Partington Ridge’*

To prevent potential impacts to Smith’s blue butterfly, in all or portions of the above fuelbreak segments that are at or below 2,300 feet in elevation and less than approximately 5 miles from the coastline, a botanist or other trained personnel will survey for Smith’s blue butterfly host plants seacliff buckwheat (*Eriogonum parvifolium*) and coast buckwheat (*Eriogonum latifolium*). If either species is found, it will be identified and flagged for avoidance.

*Fuelbreak Segments: ‘Bottchers Gap to Skinner Ridge’, ‘Skinner Ridge’, ‘Skinner Ridge to Devils Peak’, and ‘Mescal Ridge’*

1. To avoid direct impacts to federally listed and/or FS Sensitive amphibians, where the treatment unit/project activities come within 300 feet or less of Mill Creek, a biologist will be present during implementation to survey for amphibians that could potentially

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<sup>3</sup> There are currently no known condor nests within or adjacent to the treatment units.

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occur within treatment areas. If amphibians are found, avoidance measures will be prescribed.

2. Maintain a limited operating period prohibiting activities within approximately .25 miles of California spotted owl nest site, or known activity center where nest site is unknown, during the breeding season (February 1 through August 15), unless surveys confirm that the owls are not nesting. Land Management Plan (S19, S20).

### *Fuelbreak Segments: ‘Mescal Ridge’ and ‘North Coast Ridge Road - Terrace Creek Trailhead to Cold Springs’*

To avoid potential impacts to California tiger salamanders and their potential habitat, heavy equipment and vehicles when traveling through grasslands will stay on existing roads.

### *Fuelbreak Segments: ‘Post Summit to Little Sur River’ and ‘Lower Skinner Ridge to Boy Scout Camp’*

1. To avoid disturbance to potential marbled murrelet nesting activities, no project activities will occur within 0.5-miles of the Little Sur River from April 1 through September 30. This restriction can be waived during seasons when surveys are conducted which establish that there is no marbled murrelet presence within the 0.5-mile treatment unit buffer.
2. Maintain a limited operating period prohibiting activities within approximately .25 miles of California spotted owl nest site, or known activity center where nest site is unknown, during the breeding season (February 1 through August 15), unless surveys confirm that the owls are not nesting. Land Management Plan (S20).
3. To avoid potential impacts to federally listed and/or FS Sensitive amphibians within 300 feet of the Little Sur River, a biologist will be present during implementation to survey for amphibians. If amphibians are found, avoidance measures will be prescribed.

### *Fuelbreak Segments: ‘North Coast Ridge Road – Cold Springs to Tan Bark Trail’ and ‘Tan Bark Trail’*

Within the fuelbreaks that are extended to 300 feet wide, snags >24 inches DBH, that do not affect the integrity of the fuelbreak or create a safety hazard, will be retained as legacy trees and habitat for migratory birds; particularly large pre-existing snags (i.e. those that were present prior to the last wildfire). Marking of snags for retention will be coordinated with the Ventana Wildlife Society.

### *Fuelbreak Segments: ‘Hennicksons Ridge to Tassajara Road’ and ‘Chews Ridge Lookout to Wilderness Boundary’*

If not posing a safety hazard or affecting the integrity of the fuelbreak, retain 10-15 hard snags per five acres, minimum 16 inches diameter at breast height and 40 feet tall. Land Management Plan (S14).

Riparian Conservation Areas (RCAs)

Manage RCAs to maintain or improve conditions for riparian dependent resources. Land Management Plan (Part 2 - WAT 1). BMP

1. No heavy equipment such as tractors and masticators will be permitted in RCAs; hand thinning only. BMP
2. No piling or ignition of fuel will be permitted in RCAs.
3. Fire associated with fuel treatments may 'back' into RCAs.
4. To avoid direct impacts to species associated with riparian/aquatic habitat, herbicide application will not be applied on riparian obligate species. BMP
5. To avoid potential contamination, herbicide applicators will avoid walking or stepping in water. BMP
6. Effective shade over water will not be reduced below 80%; or lower than existing conditions if conditions are already below 80%.
7. Any trees felled within RCAs must be retained. Consult with fisheries biologist and/or hydrologist on placement to prevent overloading stream channels.
8. To avoid direct impacts to species associated with riparian/aquatic habitat, no brush cutting will occur within riparian vegetation communities.

## Appendix B: Monitoring and Adaptive Management

In advance of work (re-establishment and maintenance), an interdisciplinary monitoring team composed of a fuels specialist, traditional tool specialist (for wilderness only), handheld motorized tool specialist, landscape architect (or similar), trail specialist for trail protection and/or maintenance (only for fuelbreak segments that contain a Forest Developed Trail), and resource advisor (wilderness resource advisor in wilderness) will prepare a Situational Report recommending the appropriate equipment, tools, and workforce for each specific fuelbreak segment. This will provide an accurate assessment of current vegetation conditions. The report will also identify expected timelines and personnel involved and convey specific instructions to crew leaders. Interdisciplinary specialists will be used as needed to ensure proper implementation of project design criteria and mitigation measures.

### Wilderness Treatments

In designated wilderness, the Situation Report created by the interdisciplinary monitoring team will identify specific sites within the project area where traditional tool strike teams (if available) could be used safely within reasonable timelines (considering time constraints), and where handheld motorized tools are recommended based on the specific criteria below.

Criteria for recommending use of handheld motorized tools in wilderness:

- There are hazardous situations that pose a risk to the health and safety of workers using only traditional/non-motorized tools. The Occupational Safety and Health Act of 1970 requires the Forest Service to ensure safe and healthful workplaces by instituting procedures and practices that help prevent accidents, injuries, and illness. For compliance with the Act, the following hazardous situations compromise the safety of those working in the field and require special procedures to reduce the risk of injury to workers:
  1. Topography/Steepness of Ground – Slopes  $\geq 35\%$  constitute additional hazards such as footing, stability, and ease of movement.
  2. Hazard Trees – Trees that have one or more of the following hazardous characteristics: split, broken or dead/decayed top, dead/decayed branches, deterioration or physical damage to the root system or trunk, lean degree/direction, fire damaged, on steep slope or difficult terrain. Higher exposure time and number of workers exposed increases the chance of an accident.
  3. Brushfields - Brush coverage is  $\geq 40\%$  and  $\geq 6$  feet in height, increasing the difficulty and duration for workers to access the main trunk, cut, and remove for pile burning.
  4. Exposure Time – Estimated days needed to cut vegetation as per fuelbreak design criteria and pile for burning. Exposure time as a risk is a compilation of fatigue, exposure to tools and the natural elements; higher exposure time increases the chance of an accident.
- Progress at specific locations within the project area is too slow, preventing completion of scheduled fuelbreak maintenance within reasonable timelines considering time constraints and the efficient expenditures of funds and personnel time.

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Time constraints include weather events, wildlife mitigation, and funding restrictions. Weather time-constraints include: inclement weather (typically during winter storm months December through March), during Declared Fire Season when fire risk is high (typically June through October) and support from fire personnel is likely unavailable. For wildlife mitigation, it is recommended that pile burning not occur from March 15 through July 15 to mitigate effects to migratory and resident birds. On selected fuelbreak segments, to avoid potential impacts on nesting California spotted owls, there is a limited operating period between February 1 and August 15. Funding often has mandated implementation timelines that we cannot ignore when coupled with environmental events and wildlife mitigations.

Based on the above criteria, when handheld motorized equipment is recommended for specific locations or situations in wilderness, this will be documented in the Situational Report and will be sent to the line officer with the authority to approve the administrative use of handheld motorized equipment in wilderness for review and approval of the workplan before work begins.

### Project Wide Monitoring and Adaptive Management

Members of the interdisciplinary monitoring team will be involved in implementation monitoring and post-implementation review as needed to ensure the following:

#### Implementation Monitoring

- Check compliance with Situational Report. This will include spot-checking to verify timelines and meeting project design standards or other mitigation measures.
- Spot-check to verify appropriate use of tools.

#### Effectiveness Monitoring

- Determine if prepared fuelbreaks are sufficient for suppression activity.
- For hazardous situations, ensure all safety procedures and practices are implemented to help prevent accidents and injuries to workers. Specific hazardous situations are listed above.

#### Validation Monitoring

- Document how well the overall program is working to meet project objectives and protecting resources of concern.
- Ensure compliance with the NEPA decision and identify any changed conditions or unintended consequences. This information will be used to check consistency with the NEPA documentation and identify when a NEPA review is necessary.

#### Adaptive Management

If monitoring indicates: 1) Work is not meeting expected timelines established in the Situational Report, 2) Hazardous situations cannot be mitigated effectively to reduce the risk of accidents or injury to workers, or 3) Fuelbreaks were not used as predicted during wildfire suppression, an interdisciplinary team of relevant specialists will determine what adjustments in management are needed. Adjustments include, but are not limited to:

- Cessation of maintenance
- Additional mitigation measures

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- Re-evaluation of tool or equipment selection

Changes will be reflected in the next scheduled Situational Report. If a needed change has not been evaluated in the FEIS, additional NEPA analysis and decisions may be necessary.