

## **Decision Memo**

# **Echo Hills Fuel Reduction Project**

**USDA Forest Service**

**Clear Creek Ranger District, Arapaho and Roosevelt National Forests**

**Clear Creek County, Colorado**

**Located in:**

**T. 4 S., R. 72 W., Sections 21, 22, 27 6<sup>th</sup> P.M.**

### **Background**

The Clear Creek Ranger District of the Arapaho and Roosevelt National Forests proposes to apply fuel reduction activities on approximately 70 acres of National Forest System lands adjacent to County Road #470 (Sinton Road) which provides a single access to the Echo Hills Subdivision. The purpose of this project is to create a fuel break adjacent to the sole ingress/egress route for the Echo Hills Subdivision through creating openings in the forest canopy, thinning, and aspen enhancement adjacent to the road and subdivision. The proposed treatments would extend approximately one mile from the intersection of Colorado Highway 103 and County Road #470 to the boundary of the Echo Hills Subdivision. The project boundary further extends up to 265 feet from the road edge on both sides of County Road #470.

Over the last decade, the number of acres and homes burned in wildfires has increased dramatically. More than 1,000 homes have been destroyed in wildfires in Colorado since 2012. The forest type surrounding the Echo Hills Subdivision is predominantly lodgepole pine which can exhibit a high potential for wildfire hazard. This project would provide access for wildfire suppression efforts in the event of a wildfire and also ingress/egress to residents of the Echo Hills Subdivision. This project would also complement recommendations from the Echo Hills Community Wildfire Protection Plan, and defensible space work performed by Clear Creek County and residents within the subdivision.

The purpose of this project is to create a fuel break adjacent to the sole ingress/egress route for the Echo Hills Subdivision through creating openings in the forest canopy, thinning, and aspen enhancement adjacent to the road and subdivision. The proposed treatments would be implemented by hand with chainsaws. Slash treatment would be a combination of, piling and potential burning of material 6" diameter and less, chipping, masticating, or removing off-site with valid fuelwood permits obtained from the USFS. Treatment may also include bucking and piling of existing downed woody debris within the

limitations of Forest Plan standards. There would be no additional road construction required for this project. To minimize impacts to the environment, implementation of this decision includes the use of design features prescribed by Forest Service Resource specialists. This list is included as Appendix A of this document.

## **Decision**

I have decided to implement the Echo Hills Fuel Reduction Project to create a fuel break adjacent to the sole ingress/egress route for the Echo Hills Subdivision. This project will include treatment of up to 70 acres of National Forest System lands performed by hand with chainsaws within the project area (see attached map). Slash treatment will be a combination of piling and potential burning of material 6" diameter and less, chipping, masticating, or removing off-site. Small inclusions of established aspen areas that are scattered throughout the conifer stands will be restored by removing conifers from within and adjacent to the aspen inclusions.

This project can be implemented using existing roads and travelways within the project area. To minimize impacts to the environment, implementation of this decision includes the use of design features prescribed by Forest Service Resource specialists. This list is included in Appendix A of this document.

## **Categorical Exclusion**

Decisions may be categorically excluded from documentation in an environmental impact statement (EIS) or an environmental assessment (EA) when they are within one of the categories identified by the U.S. Department of Agriculture in 7 CFR part 1b.3 or one of the categories identified by the Chief of the Forest Service in and found in the 36 Code of Federal Regulations (CFR) 220.6 (e) or (d), and there are no extraordinary circumstances related to the decision that may result in a significant individual or cumulative environmental effect.

This project is within the category of exclusion found in Forest Service handbook (FSH) 1909.15 Chapter 30, section 32.2 to be cited as 36 CFR 220.6(e)(6): Timber stand and/or wildlife habitat improvement activities that do not include the use of herbicides or do not require more than 1 mile of low standard road construction.

Use of categorical exclusions is appropriate in this situation because the analysis conducted by Forest Service resource specialists determined there would be no adverse effects resulting in extraordinary circumstances that would warrant further analysis and documentation in an Environmental Assessment or Environmental Impact Statement. Resource conditions considered to present extraordinary circumstances would be:

1. *Federally listed threatened or endangered species or designated critical habitat, species proposed for Federal listing or proposed critical habitat, or Forest Service sensitive species* - The Endangered Species Act requires that federal activities do not jeopardize the continued existence of any animal or fish species federally listed or proposed as threatened or endangered, or result in adverse modification to such species' designated critical habitat.

This decision will not adversely impact lynx productivity, mortality, or movement. In addition, potential effects are not anticipated to exceed determination thresholds for any species analyzed, exceed lynx screen criteria or compromise the function of the Mt. Evans LAU. Therefore, this decision does not adversely impact federally listed threatened or endangered plant species, nor does it impact critical habitat, or species proposed for federal listing, or Forest Service sensitive species.

2. *Flood plains, wetlands, or municipal watersheds* - No extraordinary circumstances for wetlands, flood plains, or municipal watersheds are expected in this project. The project is in the Beaver Brook watershed, which serves the Lookout Mountain Water District, as a public drinking water supply. The project in its limited scope is not anticipated to result in adverse effects to public drinking water. No floodplains or wetlands are present within the project area; therefore, no adverse effects are anticipated to floodplains or wetlands. If they are discovered during layout, they will be buffered appropriately per Forest Plan direction
3. *Congressionally designated areas, such as wilderness, wilderness study areas, or national recreation areas* – The project area contains no congressionally designated areas such as wilderness, wilderness study areas, or national recreation areas.
4. *Inventoried roadless areas* – The project area is not located within or adjacent to any inventoried roadless areas.
5. *Research natural areas* – The project is not located within or adjacent to any research natural areas as designated in the Forest Plan.
6. *American Indians and Alaska Native religious or cultural sites; Archaeological sites, or historic properties or areas.* - Surveys were conducted in the project area for Native American religious or cultural sites, archaeological sites, and historic properties or areas that may be affected by this decision. No sites or artifacts were found that were eligible for inclusion under Section 106 of the National Historic Preservation Act. Consultation with the State Historic Preservation Office (SHPO) was completed and they concurred with the Forest Archaeologist's conclusion that no historic properties affected or no historic properties adversely.

## **Public Involvement**

This proposal was listed in the Schedule of Proposed Actions (SOPA) for the Arapaho and Roosevelt National Forests and Pawnee National Grassland beginning on April 1, 2016. This list is updated quarterly and is made available to over 500 individuals or agencies who have expressed an interest in activities on the Forests. It is also available nationally on the Forest Service website. Specific public scoping for the project began on August 15, 2016 with a letter and map describing the proposed action sent to 96 individuals or groups who may be interested in or affected by the project. There were seven responses received from this outreach effort. Forest Service responses to comment letters are attached to this Decision Memo in Appendix B.

## **Findings Required by Other Laws**

The activities of this project do not violate applicable federal, state, or local laws enacted for the protection of the environment. The decision is consistent with the goals and objectives as stated in the 1997 Revision of the Land and Resource Management Plan for the Arapaho and Roosevelt National Forests and Pawnee National Grassland (Forest Plan). In addition, this decision meets the requirements of the Healthy Forests Restoration Act (2003), the Clean Air Act (1990), the Clean Water Act (1972), the Endangered Species Act (1973, 1978, 1982), the National Forest Management Act (1976), the Multiple Use-Sustained Yield Act of 1960, the National Environmental Policy Act (1969), and the National Historic Preservation Act of 1966, as amended.

### ***Energy Requirements and Conservation Potential of Proposed Action:***

The energy required to implement the proposed action, in terms of petroleum products, would be insignificant when viewed in light of the production costs and effects of the national and worldwide petroleum reserves.

### ***Environmental Justice (Executive Order 12898):***

This Order requires consideration of whether projects would disproportionately impact minority or low-income populations. Public outreach did not identify any adversely impacted local minority or low-income populations. Therefore, this decision is not expected to adversely impact minority or low-income populations and is in compliance with Order 12898

### ***Invasive Species Executive Order 13112 of February 3, 1999:***

Land actions that disturb the ground (including hazardous fuel reduction treatments) have the potential to contribute to the spread of non-native invasive species (also referred to as noxious weeds). Fuel reduction treatments can create areas of exposed mineral soil that provide a seed bed for establishment of noxious

weeds. The seed source can come from existing populations of noxious weeds within or adjacent to the treatment areas or can be brought in from outside the project boundary. To assist in determining the source and therefore the potential for spread, the treatment areas will be surveyed for the presence of noxious weeds prior to implementing the treatment activities.

The risk of spread would be confined to the treatment areas and therefore easier to monitor and control. By reducing the potential for severe wildfire, the benefits of the project outweigh the harm caused by the potential introduction of invasive species in localized areas of treatment units.

If new populations of invasive species are found within the unit after treatments have been completed, the sites will be mapped and added to the list of known occurrences on the Boulder Ranger District. These sites will be treated immediately with priority given to locations adjacent to private property. Treatment strategies will be determined according to methods approved in the Arapaho and Roosevelt National Forests and Pawnee National Grassland Noxious Weed Management Plan.

***Irreversible Resource Commitments and Irretrievable Losses:***

The physical and biological effects are limited to the project area and/or immediate adjacent areas. There are no known significant irreversible resource commitments or any significant irretrievable losses of vegetation resources, wildlife habitats, soil productivity, water quality, or other renewable resources.

**Administrative Review or Appeal Opportunities**

This decision is not subject to a higher level of administrative review or appeal, pursuant to the Agricultural Act of 2014.

**Implementation Date**

Implementation of this decision may occur immediately.

**Contact Person**

For additional information concerning this decision, please contact:

Kevin Zimlinghaus, Project Leader

Boulder Ranger District

2140 Yarmouth Ave., Boulder, CO 80301

(303) 541-2537 or [kzimlinghaus@fs.fed.us](mailto:kzimlinghaus@fs.fed.us)

## Signature and Date

I have concluded that this decision may be categorically excluded from documentation in an environmental impact statement or environmental assessment as it is within one of the categories identified by the Chief of the Forest Service in 36 CFR 220.6, and there are no extraordinary circumstances related to the decision that may result in a significant individual or cumulative environmental effect. My conclusion is based on information presented in this document and the entirety of the Planning Record.



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10/20/2016

Scott Haas

Date

Acting District Ranger

Clear Creek Ranger District

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## Appendix A

### Design Features and Mitigation Measures

#### Cultural Heritage

##### MECHANICAL TREATMENT UNITS

- Prior to project implementation, a Class III intensive Cultural Resource Inventory would be completed on all units designated for mechanical (other than chainsaw) treatment. Implementation would not begin until the Colorado State Historic Preservation Officer (SHPO) has concurred with a determination of no historic properties affected or no historic properties adversely affected.
- Sites that are located during the field inventory and are evaluated as eligible for the NRHP within mechanical treatment units will have a 50 foot buffer placed around the exterior boundary of the site. No mechanical treatment would occur within the site boundary and the 50-foot buffer around the site. If treatment is necessary, these sites and a 50-foot buffer will be hand treated for hazard trees. No thinning, pile burning, or other slash treatments would occur within these buffers unless determined to be appropriate by the Project Archaeologist.
- All NRHP eligible or unevaluated sites within the units proposed for mechanical treatments would be flagged on the ground for avoidance during implementation.
- Previously undiscovered sites encountered during the course of project activities would be avoided until they can be evaluated by an archaeologist. If affected properties are discovered after project activities are completed, the Forest would document any damage and consult with SHPO and Council pursuant to 800.13(b).

#### Lands

- Land line boundaries close to treatment units should be surveyed prior to implementation, to ensure treatments do not encroach on private property.
- The IREA electric distribution power line special use permit is located along the southern part of Sinton Road in the proposed treatment area. The right of way width is 10 feet. Any treatments within the ROW should be avoided, unless coordinated with IREA.
- New mining claims may be filed within or adjacent to the project area units. Project actions should not unreasonably interfere with the claimant's access to conduct activities on their claims, if encountered during project implementation.
- Lookout Mountain Water District, operators of Beaver Brook Reservoir, should be notified of the proposed project.

#### Fuels

- Slash must be either piled for burning, chipped, masticated, or removed off site.
- Slash take back would only be allowed on skid trails, where it is needed to meet the coarse and fine woody debris retention concerns, or other areas designated as adversely impacted by a U.S.

Forest Service Soil Scientist/Hydrologist/COR/Sale Administrator, for soil stabilization, and to a maximum depth of 12 inches.

- Minimum pile size, hand or machine created, shall be no less than 6' high by 6' wide.
- Consult U.S. Forest Service Fuels Specialist during contract preparation for current maximum pile size and pile separation requirements as regulated by the Colorado Air Pollution Control Division.
- Piles shall be constructed in a manner to minimize large air spaces and dirt within the piles. Piles shall not have material extending more than 4 feet in any direction beyond the pile perimeter and a minimum of 4 feet of separation from pile perimeter to surrounding down woody material to reduce unwanted fire spread.
- Construct a minimum of a 6 foot wide control line, down to bare mineral soil, around each machine pile to create separation between piled material and surrounding slash mat. If piles are grouped, a single control line may be placed around the entire group rather than around individual piles. The scraped material must be moved outward to avoid a berm adjacent to the piles' edge.
- In machine units, reasonably gather and place activity slash material, 1" to 6" diameter, into piles. If more than 50% of a treatment unit has continuous slash depth greater than 6 inches after initial treatment, additional piling would be required.
- In hand units, pile sound, existing and/or created slash material, 1" to 6" diameter and 2 feet or longer. Alternatively, any slash that must be moved more than 50 feet to meet minimum required pile size may be lopped and scattered to a maximum depth of 18 inches.
- Locate machine piles a minimum of 150 feet and hand piles a minimum of 50 feet from any infrastructure or private property boundary.

### **Invasive Plants**

These prevention measures are designed to comply with the Guide to Noxious Weed Prevention Practices and the Arapaho and Roosevelt National Forests and Pawnee National Grassland Noxious Weed Management Plan.

- To minimize risk of noxious weed introduction and spread, require all equipment brought on site for implementation to be clean, i.e., free of mud, dirt, plant parts and seeds, or other debris that could contain or hold seeds, prior to entering the project area.
- For any new noxious weed infestations found in or near impact areas prior to or during implementation, implementation personnel will coordinate with the District Invasive Plants Coordinator to take appropriate prevention measures, such as avoidance, treatment of weeds, and/or additional equipment cleaning requirements.



## **Appendix B**

### **Scoping Comment Review**

**Comments were received concerning possible mitigation measures that are beyond the scope of the proposed project.**

- Installation of cisterns outside of the Echo Hills Subdivision.

Response: The proposed action includes only vegetation mitigation and slash treatment.

- Opening and maintaining the road on the east end of the subdivision that extends to the bottom of Castlewood.

Response: This road is not on National Forest System lands and the U.S. Forest Service does not have jurisdiction to authorize activities on that particular road.

- Extend the project to include the cutting of up to 265' on either side of the fire road that extends from Highway 103 up to the Echo Hills Subdivision.

Response: At this time, the fire road that is referred to is not a system road that is maintained by the Forest Service.

**Comments were received concerning the planning process and community involvement, and the environmental analysis documentation for this decision.**

As stated in the attached Decision Memo, this project is designed to create a fuel break adjacent to the sole ingress/egress route for the Echo Hills Subdivision through the creation of openings in the forest canopy, thinning, and aspen enhancement adjacent to the road and subdivision. It is designed not only to reduce fuels adjacent to County Road #470 (Sinton Road), but also to maintain natural resources and enhance values such as water quality, forest health and wildlife habitats.

This project was initially identified in the Schedule of Proposed Actions. Additionally, ninety-eight letters were sent to the residents of Echo Hills soliciting comments and concerns regarding the proposed activities.

The decision to use Categorical Exclusion at 36 CFR 220.6 (e) (6) and Decision Memo as the decision making tool for this project was based on the scope and purpose of this project, the public involvement and interest we received, the support we have received for this proposal and the anticipated impacts identified during the environmental analysis. This project falls within the a category that can be excluded from documentation in an Environmental Assessment (EA) or Environmental Impact Statement (EIS) because the scope of anticipated impacts has been determined to fall within an acceptable range for this type of activity. The categorical exclusion is appropriate in this situation because there are not extraordinary circumstances potentially having effects which a significantly affect the quality of the human environment. Thinning and forest management at this scale is considered to be normal and routine. Issues and public concerns related to this project have

been mitigated through project design criteria, mitigation measures and management requirements as specified by applicable laws and policies and Forest Plan standards and guidelines.

**Comments were received concerning the retention of all conifers besides lodgepole pine.**

The composition, structure, and arrangement of the trees in the forest is more important than individual tree species that are retained when it comes to fuel breaks. The objective of the project is to create a fuelbreak along Sinton Road that will allow the ingress/egress of vehicles in case of an emergency situation (i.e wildfire). Through the implementation of the project there will be an effort to maintain other species as much as possible while still meeting the project objectives.

**Comments were received concerning the commercial benefit to specific individuals who “harvest” the trees. Will cut material be available for fuelwood collection after the project is completed?**

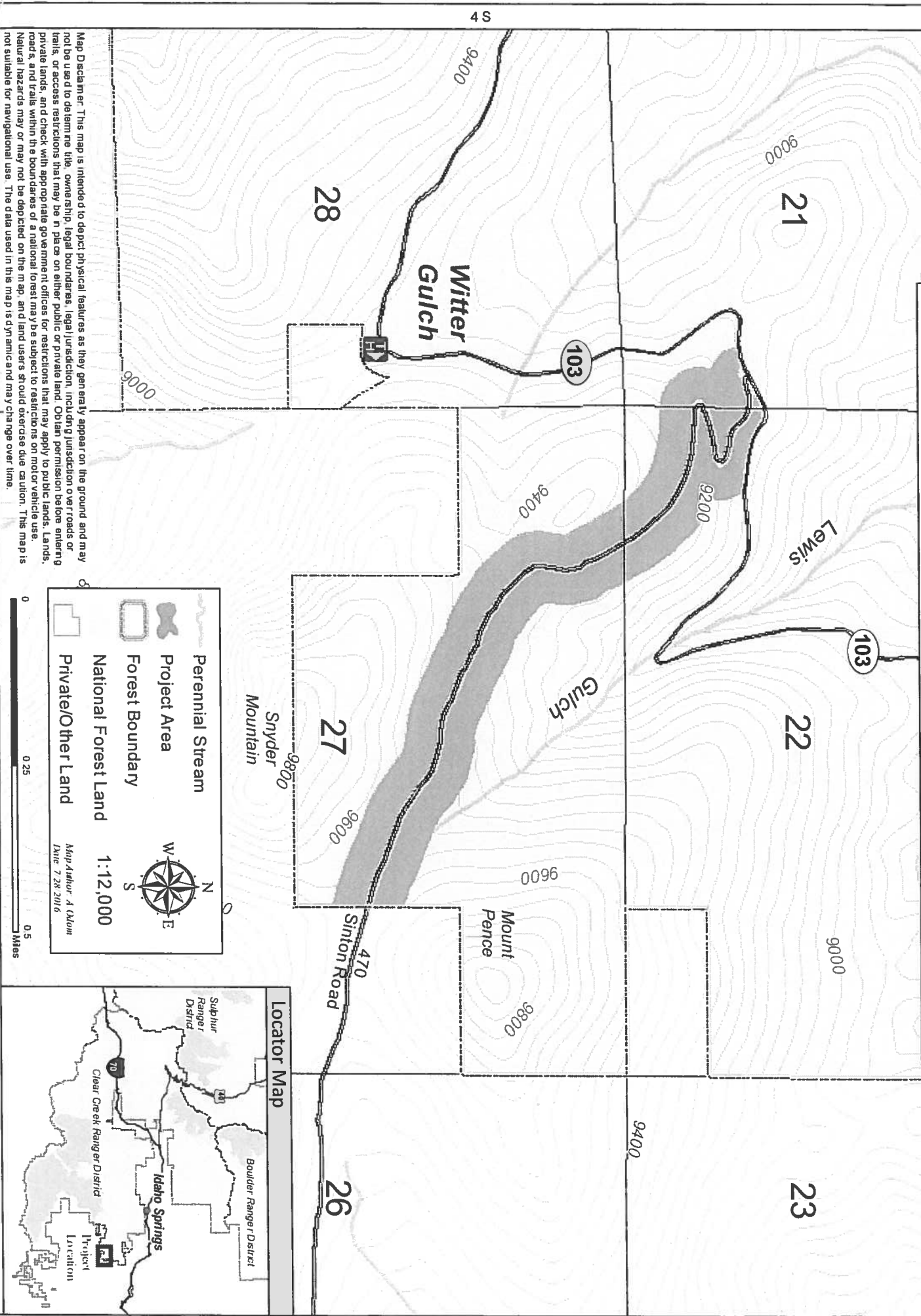
Individual trees have very little value to commercial timber operators in this area. There is very little to no infrastructure to process the trees into forest products. Hand crews with chainsaws will be contracted to complete this work, similar to what we believe the private residents of Echo Hills are sometimes using to complete fuels mitigation and defensible space around their homes.

Once the contractor has completed the cutting and piling, fuelwood will be made available to individuals who have appropriate fuelwood permits. These permits can be purchased for \$20/cord (5 cord maximum) from the Clear Creek Ranger District Office. Appointments are required to purchase a fuelwood permit and can be made by calling (303) 567-3000. Treated material that is piled, however, will not be available for fuelwood gathering.

**Comments were received concerning the possible damage to Sinton Road as a result of these activities.**

Mechanical equipment (feller bunchers, skidders, and haul trucks) will not be used for this project. Hand crews with chainsaws will cut the vegetation and pile the slash material. Most likely the crews would travel in vans and should not disturb the existing roadbase. We may chip some of the slash with a tracked chipper that can be maneuvered through the forest to each pile. This equipment would be trailered in if chipping is needed to treat the residual fuels. Crews will not be parking their vehicles within the boundaries of the Echo Hills Subdivision.

# Echo Hills Fuels Reduction Project



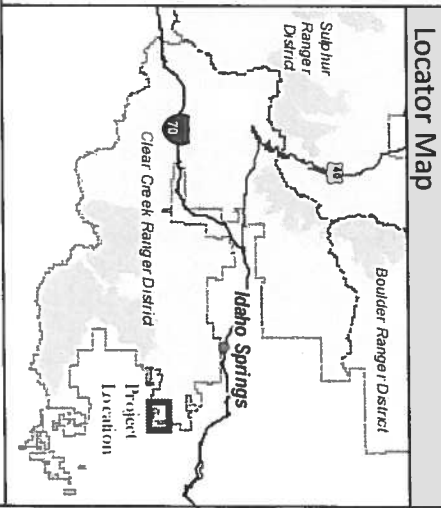
	Perennial Stream
	Project Area
	Forest Boundary
	National Forest Land
	Private/Other Land

Map Author: A. Olson  
Date: 7/28/2016

Scale: 1:12,000

0 0.25 0.5 Miles

**Map Disclaimer:** This map is intended to depict physical features as they generally appear on the ground and may not be used to determine title, ownership, legal boundaries, legal jurisdiction, including jurisdiction over roads or trails, or access restrictions that may be in place on either public or private land. Obtain permission before entering private lands, and check with appropriate government offices for restrictions that may apply to public lands. Lands, roads, and trails within the boundaries of a national forest may be subject to restrictions on motor vehicle use. Natural hazards may or may not be depicted on the map, and land users should exercise due caution. This map is not suitable for navigational use. The data used in this map is dynamic and may change over time.



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