
INTEROFFICE MEMORANDUM

TO: JEMEZ WILDLAND URBAN INTERFACE HAZARD REDUCTION PROJECT FILE
FROM: DEREK PADILLA
SUBJECT: CLARIFICATION FOR LADDER FUELS IMPLEMENTATION AT THOMPSON RIDGE
DATE: 2/6/07
CC: ANDY VIGIL, DAN KEY, BILL ARMSTRONG, TOM FUCHTMAN

This memo is to clarify how ladder fuel and thinning treatments should be implemented as approved in the June 10, 2003 signed Decision Notice for the Jemez Wildland Urban Interface Hazard Reduction Project. The Decision Notice and Environmental Assessment are written vaguely with respect to what size trees can be removed in various treatment areas and how these areas can be accessed. This memo is to clarify the decision based solely on information found in the Final Environmental Assessment or from the Decision Notice itself. This clarification memo does not change the original decision in any way or reduce or decrease the mitigations originally written into the Final Environmental Assessment in Chapter 2, Pages 11-17.

Thinning:

Chapter 1. Page 15 of the EA: Generally trees up to 12" may be cut

Larger trees than 12" can be cut where 10' between tree crowns (individual or grouped trees) and 15' crown-to-base heights cannot be met

On low quality sites, no ponderosa pines over 14" can be cut and no mixed conifer over 18" can be cut. On high quality sites, no ponderosa pine over 18" can be cut and no mixed conifer over 20" can be cut

On slopes > 40% no trees > 9" will be cut

Chapter 1. Page 15 of the EA: The proposed action calls for *average* 10' spacing between individual tree canopies or grouped tree canopies. The language of the EA generally supports leaving groups/clumps for all tree sizes, but it is required in areas of larger trees (VSS 4, 5, or 6).

Chapter 2, Page 12 of the EA: No "large" trees, as defined in Chapter 1, will be cut.

This means that on low quality sites, no ponderosa pines over 14" can be cut and no mixed conifer over 18" can be cut. On high quality sites, no ponderosa pine over 18" can be cut and no mixed conifer over 20" can be cut

Chapter 2, Page 14 of the EA: Retain all trees greater than 24" d.b.h.

Chapter 2, Page 15 of the EA: Retain as many snags greater than 9" as possible

Chapter 2, Page 12 of the EA: Down logs and snags 12" diameter and greater will be retained in riparian areas.

Ladder Fuel Reduction:

Ladder fuel reduction generally follows the same exact limitations for tree cutting as mentioned above in 'Thinning', however, ladder fuel treatments would have much less effect on the overstory canopy and would focus on removing white fir regeneration where present.

Chapter 3. Pg 10 of the EA: "Where ladder fuel reduction is proposed, the residual

structure would be toward a two-storied stand, rather than the current multi-storied stand structure. There would not be any considerable change in the overstory structure or composition. In mid-aged forest (VSS4) a maximum of 1/3 of the stand may be brought to an average canopy closure of 40% or greater and the remaining 2/3 should retain a canopy closure of 60% or greater. In mature forests (VSS 5 and 6) a minimum average canopy closure of 60% should be retained. To the greatest degree possible white fir seedlings would be favored for removal from the understory.”

Road Use / Road Construction:

Chapter 2. Pg 11 and 12 of the EA:

- Allow no temporary or permanent road construction
- All skid trails and ORV trails resulting from the proposed action will be obliterated and restored
- (pg. 14) Off road vehicle use should be kept to a minimum. Vehicles should park as close to the road as possible and use wide areas in the road to turn around.
- (pg. 15) Obliterate equipment and off road vehicle tracks to the extent possible
- Equipment staging areas should be located in previously disturbed areas and outside of sensitive habitat

As discussed above, the decision does not allow for new or temporary road construction, but allows for off-road access by equipment when necessary. Chapter 1. Page 16 also states, “No new road construction is proposed. Existing roads would be maintained to provide safe access to the project areas, *closed roads may be re-opened to standard and closed following project completion.* Existing non-forest system roads may be closed and obliterated following project implementation.” In other words, both existing system roads or existing closed roads may be used and maintained to their designated standard for implementation.

This last point of re-opening closed roads was an appeal point for this project. The findings in the appeal illuminate the subject matter a bit more when they state, “It is clear from the paragraphs above that the Forest has assessed the road condition(s) and concluded that only maintenance is required. If the road maintenance levels were to be actually changed, the project assessment of the roads would state that road construction and/or reconstruction would be necessary. The EA states that no new roads would be constructed and that maintenance is all that is required. Therefore, no changes in road management activities are proposed with the implementation of the proposed alternative.”

In summary, the decision allows for the use of existing Forest Service system roads and closed roads. Closed roads may be re-opened and maintained *to their maintenance level* (as described on page 215 of the Santa Fe National Forest Plan) for project implementation and then will be re-closed and rehabilitated per the above mitigations.