Twofer Fuels Reduction Project
Draft Decision Notice

USDA Forest Service
Eldorado National Forest
Pacific and Placerville Ranger Districts
El Dorado County, California

Introduction

In July 2019, an Interdisciplinary Team of Forest Service specialists completed the Twofer Fuels Reduction Final Environmental Assessment. This draft decision notice provides information about the project, describes my decision, and explains the rationale for my decision.

The Twofer Fuels Reduction Environmental Assessment and supporting specialist reports are incorporated by reference in this document. The Environmental Assessment (which includes a Finding of No Significant Impact,) this draft decision document, and primary specialist reports are available for download from the Eldorado National Forest website under the Twofer Fuels Reduction Project listing at https://www.fs.usda.gov/projects/eldorado/landmanagement/projects.

Project Area

The Twofer project is located on the western slope of the Sierra Nevada, in a wildland-urban interface on both the north and south side of the heavily traveled U.S. Highway 50 in El Dorado County, CA (T12N R14E, T11N R13E, R14E, and R15E, and small portions of T10N R14E and R15E; Mount Diablo Base & Meridian).

Decision

Based upon my review of the Twofer Fuels Reduction Environmental Assessment, supporting documentation, and public comments, I have decided to implement the Proposed Action, with minor modifications, to treat approximately 8,561 acres on the Pacific and Placerville Ranger Districts of the Eldorado National Forest using a variety of methods to improve forest health and fire resiliency.

The modified Proposed Action, including all project design criteria, will be implemented under this decision, and is fully described in the Environmental Assessment (EA pp. 6-18). The following is a summary of the actions described in the EA:

- Creation of strategically placed fire line fuel breaks along ridges and roads throughout the project area. Treatment of areas outside of these fuel breaks are also designed to make the project area more resilient to disturbances such as wildfire, insects and disease. Fuel breaks are proposed on approximately 1,657 acres (note that fuel break treatment acreages overlap with portions of the hand and mechanical treatments described below).

- Mechanical thinning treatments of trees up to 30 inches diameter breast height, or up to 20 inches diameter breast height in protected activity centers. Approximately 2,920 acres of treatments in both plantation and non-plantation stands are designed to maintain the

canopy cover and basal area standards and guidelines described in the Forest Plan. The target residual basal areas would vary in an uneven arrangement to develop more spatially complex stands with individual trees, clumps, and openings, and encourage species compositions consistent with slope position and aspect for the stand.

- Mastication (approximately 566 acres) and hand thinning (approximately 753 acres) of shrubs and small trees (up to 11 inches diameter at breast height) would be implemented to reduce the density of understory fuels and non-commercially sized trees, and to increase heterogeneity in stand structure. Hand thinning would occur in areas which are inaccessible by mechanical means or which are deemed more appropriate to treat by this method.

- Prescribed burning of fuels piled after thinning or mastication work, and understory burning conducted as either an initial treatment or as a follow-up to other vegetation treatments, would occur on approximately 7,541 acres to reduce understory or activity-generated fuels. Prescribed fire or the management of natural ignitions for resource benefits under prescription conditions would be prioritized in strategic locations to reduce the risk of large fires on the surrounding landscape.

- Herbicide would be applied to approximately 7,297 acres as a follow-up treatment in the masticated areas of the Twofer Project, as well as in areas recently treated under the Cleveland-Ice House, Pilliken, and Middle Creek Forest Health decisions. Herbicide application will be used to treat problematic brush species that re-sprout vigorously when cut, leading to large amounts of surface and ladder fuels. Only one herbicide treatment would occur on a site in a given year. Treatments of target vegetation would be continued until the objective (typically less than 30 percent shrub cover) is achieved.

- Hazard trees (either dead or unstable live trees) of all sizes would be removed along timber haul roads and landings to provide for safety of workers and the public, except where restrictions for removal apply.

- Road maintenance and reconstruction is proposed within the project area to facilitate the treatments described above, and to improve water quality.

- Targeted grazing operations using goats or sheep would be permitted to treat infestations of invasive plant species, such as star thistle, medusahead and goat grass.

My decision includes the following modifications to the Proposed Action in consideration of input received during tribal consultation and during the public comment period:

- An upper limit of 20 inches diameter at breast height has been added for mechanical treatment of trees within protected activity centers (EA p. 7). This limit would apply to approximately 104 acres of treatment proposed within protected activity centers. The upper diameter limit was added to clarify the forest's intent to treat the minimum fuels necessary within these areas and to respond, to the extent feasible, to public comments expressing concern over proposed treatments within these management areas. Forest standards and guidelines state that where treatment in protected activity centers are necessary, only material needed to meet project fuels objectives may be treated (SNFPA ROD, p. 51).

- In consideration of information from the United Auburn Indian Community and from Kimberly Petree, a Nisenan-Miwok tribal member, the Proposed Action has been amended to add prescribed burning on nearly 60 acres of fuel break and adjacent area around Windmiller Ravine. Prescribed burning would replace the follow-up herbicide treatment originally proposed on approximately 14 of these 60 acres. In addition, approximately 2 acres of low impact mechanical thinning treatment (i.e. shovel logging) of larger plantation trees has been added to better protect areas of cultural importance.

The interdisciplinary team confirmed that neither of these changes to the Proposed Action would create additional effects to their resource nor change their respective analyses.

Implementation of the Proposed Action will help to meet the desired future condition and goals as described in the Eldorado National Forest Land and Resource Management Plan (USDA 1989), as amended by the Sierra Nevada Forest Plan Amendment (USDA 2004). The 2004 Forest Plan Amendment identifies specific desired conditions for both wildland-urban 'intermix' zones and for the land management classes proposed for treatment in the Twofer project area (SNFPA ROD, pp. 37-42)

My decision to implement the Proposed Action, with modifications, meets the project purpose and need to reduce stocking levels in specified plantations, reduce surface and ladder fuels throughout the project area, develop a strategic network of fuel breaks in coordination with adjacent neighboring landowners, improve the resilience of both planted and natural forests and desirable native plants, and to conduct this work in a cost-effective manner.

Summary of Public Involvement

A pre-scoping collaborator field trip to the Twofer project area occurred in October 2016. Thirteen individuals representing themselves or various agencies and organizations attended the October meeting. In August 2017, the Forest Service presented the Twofer Fuels Reduction Project Proposed Action to the South Fork of the American River (SOFAR) Cohesive Strategy group. Two additional meetings with interested parties occurred during the planning process: a February 2018 'fuel break coordination' meeting between the Forest Service and Sierra Pacific Industries, and a May 2019 meeting with representatives of John Muir Project and Sierra Forest Legacy that focused on potential impacts to protected activity centers, tall tree habitat, and species including Northern goshawk, California spotted owl, and Western bumblebee from proposed thinning and/or herbicide activities.

Public scoping was initiated for the Twofer Project on October 4, 2017. Notifications of the project proposal were made to the public, local governments, organizations, and agencies.

On October 4, 2017, consultation letters containing the project-specific scoping notice and map were sent to the Washoe Tribe of Nevada and California, Shingle Springs Rancheria, United Auburn Indian Community, and the California Indian Basketweavers Association.

The preliminary Environmental Assessment was made available in a legal notice in the newspaper of record, the *Mountain Democrat*, which began the public comment period on April 24, 2019. Letters were mailed or emailed to 74 adjacent property owners, federal, state, and local agencies and interested individuals and organizations. In addition, members of the South Fork of the American River Cohesive Strategy were notified of the public comment period via email on April 24, 2019. The preliminary Environmental Assessment and selected specialist reports were

posted on the project website during the public comment period. Seven letters or emails were received from various organizations, individuals, and tribes either during the 30-day public comment period or through tribal consultation. Appendix D of the Environmental Assessment (p. 55) shows how the Forest Service considered the comments that were received.

Rationale for the Decision

The modified Proposed Action would accomplish the project's primary purpose to accomplish critically needed fuels reduction and forest health treatments with the heavily utilized wildland urban interface along Highway 50 while best addressing concerns related to the Eldorado National Forests' management of wildlife habitat and of areas specially designated for native plant collection.

The most important objective to me is to reduce the risk of uncharacteristically high intensity wildfire, thus protecting human life and property, and important natural and cultural resources, while improving forest health and resilience over the long term. Improving forest health and reducing surface and ladder fuel accumulations across the project area are essential to effectively reducing the risk of large, potentially damaging wildfires to life, property, and natural and cultural resources.

The proposed action is responsive to input received during tribal consultation and public scoping which expressed concerns ranging from the high risk of wildfire to life, property and infrastructure, to concerns about the project's potential impact on wildlife, including the long-term viability of the California spotted owl in the Sierra Nevada. While I agree that habitat protection of at-risk species is very important, I also believe that the specific treatments proposed within small portions of protected activity centers or home range core areas comprise critical components of the Twofer project's fuel reduction strategy. The risk of large, high intensity wildfire has become painfully apparent over the past few years. Large wildfires regularly occur on or adjacent to the Eldorado National Forest, and there is ample evidence of the adverse resource impacts caused by large high-intensity fires like the King, Butte, Sand, Fred's, Power, Cleveland, Wrights, Ice House, Pilliken, and others that have burned over the last half century. Wildland fire suppression crews are experiencing more extreme fire behavior in places like the Twofer project area, where forest fuels have accumulated, and overly dense plantation stands persist. The fuel reduction activities in the modified Proposed Action are designed to moderate fire behavior in treated stands, reduce the rate and extent of spread of high intensity fire, improve the resiliency of forested stands, and result in faster, safer, and more efficient wildfire suppression efforts.

I am convinced that the treatments proposed in protected activity centers and home range core areas are not only essential to protecting existing habitat but will ultimately improve the quality of habitat throughout the project area, particularly within plantation stands. As stated in the Terrestrial Wildlife Biological Evaluation and Assessment the proposed project activities would have limited impact to canopy cover and would maintain habitat quality for spotted owls and Northern goshawk near or at its current capability (Terrestrial Wildlife BEBA p. 36 and p. 43). Proposed thinning would primarily remove and reduce the amount of suppressed and intermediate trees leaving behind most of the larger and older trees to provide for future legacy habitat structure, consistent with the Sierra Nevada Forest Plan (SNFPA ROD, pp. 49-51). Wildlife and fuels specialists from the interdisciplinary team worked diligently to minimize impacts within and near areas of spotted owl activity (Terrestrial Wildlife BEBA pp. 35-36 and Wildlife BEBA

Addendum p. 1). Cumulative effects associated with this project are not expected to reduce the number of either species that can be supported in the analysis area and are likely to increase long-term sustainability of habitat through increased resilience (Terrestrial Wildlife BEBA pp. 31-47).

Based on current trends in habitat and climate, without treatment, habitat is at great risk to wildfire. Stephens et. al. (2016), estimated that within 75 years, the cumulative amount of nesting habitat burned by wildfire, resulting in high tree mortality, could exceed the total existing habitat. For these reasons, my decision to select the Twofer Fuels Reduction Project Proposed Action, as modified, best meets my intent of improving the resiliency of planted and natural forests to insect and wildfire risk.

Other Alternatives Considered

As described in the Environmental Assessment, I considered both the Proposed Action (EA pp. 6-18) and the effects of taking no action (EA, pp. 18-43), based on the purpose and need for the project and the current condition of the analysis area (EA, pp. 2-5). Public comment letters received from the preliminary Environmental Assessment did not lead to analysis of another action alterative. The Proposed Action was modified as explained above.

Finding of No Significant Impact

The evaluation of the effects of the project relative to the definition of significance established by the Council on Environmental Quality Regulations (40 CFR 1508.13) is contained in the Finding of No Significant Impact in the Environmental Assessment (pp. 21-42). To summarize:

There are no federally listed botanical or terrestrial wildlife species or critical habitat within the project area, therefore no effect upon such species would occur.

There are two aquatic threatened, endangered, or candidate species with potential to be affected by the project. These species are the endangered Sierra Nevada yellow-legged frog (*Rana sierrae*) and the threatened California red-legged frog (*Rana draytonii*) and their suitable habitat. There is no critical habitat for either species within the project area. The USFWS concurred with the determination by the Forest Service that the project *may affect, but is not likely to adversely affect* these species based on the implementation of avoidance measures and other design criteria included as part of the Proposed Action. In addition, the extent of treatments proposed within suitable habitat is relatively small, and are expected to occur over several years.

Three separate biological evaluations were completed to assess the effects of the Proposed Action on aquatic species, terrestrial wildlife species, and botanical species currently identified as Region 5 Forest Service Sensitive species. These evaluations for Forest Service Sensitive species determined that the Proposed Action *may affect individuals, but is not likely to result in a trend toward federal listing or loss of viability* for the identified sensitive species discussed in the EA, pp. 37-42.

A pesticide risk assessment (Walsh, 2018) was conducted to examine the potential health and synergistic effects from the application of herbicides, specifically glyphosate, triclopyr BEE, Triclopyr TEA, and adjuvants (such as a spreader-penetrator (Hasten®), and a marker dye (Colorfast® Purple), on groups of people who could potentially be exposed as a result of proposed application of these products. Risk of negative impacts are reduced through project design criteria and legal requirements that limit the potential for exposure.

Cultural resource surveys and site monitoring for the Twofer project were completed in August 2018 and a Cultural Resource Management Report (R2016-0503-60005) was completed which

determined the Twofer Project will not cause loss or destruction of significant scientific, cultural, or historical resources (EA p. 35 and p. 40).

The project area does not contain parklands, prime farmlands, wild and scenic rivers, or other ecologically critical areas. One wetland feature has been identified (approximately 1.6 acres) along the South Fork Silver Creek. This wetland will be avoided and further protected through the use of project design criteria and applicable best management practices.

Conclusion

After considering the environmental effects described in the Twofer Fuels Reduction Environmental Assessment and specialist reports, I have determined that the Proposed Action will not have significant effects on the quality of the human environment considering the context and intensity of impacts (40 CFR 1508.27). Thus, an environmental impact statement will not be prepared.

Findings Required by Other Laws and Regulations

The Proposed Action was developed in accordance with and does not threaten to violate any Federal, State or local laws or requirements for the protection of the environmental (Clean Water Act, Clean Air Act, National Historic Preservation Act, National Forest Management Act, and the Endangered Species Act). The actions being proposed are consistent with the Eldorado National Forest Land and Resources Management Plan (USDA 1989) as amended by the Sierra Nevada Forest Plan Amendment (USDA 2004).

Administrative Review and Objection Rights

This decision is subject to objection pursuant to 36 CFR 218, Subparts A and B. Objections will only be accepted from those who submitted project-specific written comments during scoping or other designated comment period. Issues raised in objections must be based on previously submitted comments unless based on new information arising after the designated comment period(s).

Objections must be submitted within 45 days following the publication of the legal notice in the Mountain Democrat. The date of the 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: Twofer Fuels Reduction Project; 1323 Club Drive, Vallejo, CA 94592, (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). Electronic objections, in common formats (such as .doc, .pdf, .rtf, .txt), may be submitted to: objections-pacificsouthwest-regional-office@fs.fed.us with the subject: Twofer Project.

Objections must include (36 CFR 218.8(d)): 1) name, address and telephone; 2) identification of a single lead objector, if applicable; 3) signature or other verification of authorship; 4) project

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. Documents may be incorporated by reference only, as provided for at 36 CFR 218.8(b).

Implementation

If no objection is filed on this project a Decision Notice may be issued on, but not before, the fifth business day following the close of the objection filing period (36 CFR 218.21). If an objection to this decision is filed in accordance with 36 CRF 218.26, then this Decision Notice may not be signed until all concerns and instructions from the reviewing official in the objection response have been addressed (36 CFR 218.12 (b)).

Applicable project activities will be enrolled under the California Regional Water Quality Control Board, Central Valley Region Waste Discharge Requirements General Order (Order No. R5-2017-0061) prior to implementation. Project implementation is expected to begin in early spring 2020.

For additional information about the project, contact: Nancy Nordensten, NEPA Planner, nancy.nordensten@usda.gov or 530-647-5485.

Approved by:

_____ _____

LAURENCE CRABTREE Date
Forest Supervisor
Eldorado National Forest