Record of Decision

Pettijohn Late-successional Reserve Habitat Improvement and Fuels Reduction Project

Shasta-Trinity National Forest
Trinity River Management Unit
Trinity Unit of the Shasta-Trinity National Recreation Area
Trinity County, California
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INTRODUCTION

This Record of Decision (ROD) documents my selected alternative for the Pettijohn Late-successional Reserve Habitat Improvement and Fuels Reduction Project (Pettijohn Project) on the Trinity River Management Unit, Shasta-Trinity National Forest. The Pettijohn Project was undertaken to address forest fuels that present a high severity fire hazard to existing and developing old-growth components and pose a risk to firefighter safety as well as driven by a desired future condition of increased old-growth conditions in the late-successional reserve. The Pettijohn Late-successional Reserve Habitat Improvement and Fuels Reduction Project Final Environmental Impact Statement (FEIS) (USDA Forest Service 2012) discloses the environmental impacts associated with the no action alternative and the proposed action that was developed to address the project purpose and need. This document includes a description of the project location, my decision and rationale, public involvement, other alternatives analyzed that were developed to respond to issues raised by the public, other applicable laws and regulations, administrative review opportunities and implementation dates.

This project was developed, and is authorized under, Section 102 (a) (5) (A-C) Authorized Hazardous Fuel Reduction Projects of the Healthy Forests Restoration Act (HFRA). Section 102 (a) (5) (B) authorizes projects that will provide enhanced protection from catastrophic wildfire for threatened or endangered species and their habitat.

LOCATION

The Pettijohn Project is in Trinity County, California, roughly five miles northeast of the communities of Weaverville and Lewiston (See Figure 1-1 in FEIS). Activities are proposed within the Trinity River Management Unit and the Trinity Unit of the Shasta-Trinity National Recreation Area on the Shasta-Trinity National Forest (Forest). The area is located within the Stuart Fork, Trinity Reservoir and Grass Valley-Weaver 5th field watersheds near Trinity and Lewiston Lakes.

Legal location includes all or portions of sections 4-10, 15-22, and 28-33 in T. 34 N., R. 8 W.; sections 4-8, 17 and 18 in T. 33 N., R. 8 W.; section 1 in T. 33 N., R. 9 W.; and sections 1-4, 2, 9-16, 21-26, 35 and 36 in T. 34 N., R. 9 W. (Mount Diablo Meridian). Unless otherwise specified, these sections are referred to collectively as the project area. Map 1 in Appendix A of the FEIS shows project vicinity.

The project area is within the Clear Creek Late-successional Reserve (LSR) and encompasses approximately 13,162 acres of National Forest System land and 8,409 acres of private land. Located within and adjacent to the project area are 21,323 acres designated by the Endangered Species Act (ESA) as Critical Habitat for the federally Threatened northern spotted owl.

The proposed project area is within the Mid-Trinity and North Lake Divisions of the Trinity County Community Wildfire Protection Plan (Trinity County Fire Safe Council 2005), and four wildland urban interface1 (WUI) boundaries have been identified that include portions of the proposed project area. The

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1 Federal Register Vol. 66, No. 3, Thursday, January 4, 2001
four WUIs are 1) Weaverville, 2) Lewiston, 3) Trinity River Management Unit 2 and 4) Trinity River Management Unit 12. Map 2 in Appendix A of the FEIS shows WUIs in the project area.

BACKGROUND

The Pettijohn Project is designed in accordance with existing USDA Forest Service planning documents, policies and procedures. The Record of Decision on Management for Amendments to Forest Service and Bureau of Land Management Planning Documents within the Range of the Northern Spotted Owl\(^2\) (Northwest Forest Plan) established a network of LSRs and accompanying management standards and guidelines. The network of LSRs is intended to provide habitat for species associated with late-successional and old-growth forests and to help ensure that late-successional wildlife species diversity will be conserved. The Shasta-Trinity National Forest Land and Resource Management Plan\(^3\) (Forest Plan) incorporated direction from the Northwest Forest Plan, including standards and guidelines for the management of LSRs.

In concurrence with Northwest Forest Plan standards and guidelines, the Forest prepared an LSR Assessment in 1999. Overall, management objectives within the LSRs are to protect and enhance conditions of late-successional forest ecosystems. Protection includes reducing the likelihood of large-scale disturbance, including stand-replacing fire and insect and disease epidemics. Enhancement includes silviculture treatments designed to accelerate the development of late-successional stand characteristics.

The Forest Service is responsible for managing forestlands to minimize fire hazard and improve and maintain ecosystem health, while contributing to the conservation and recovery of species and habitats listed under the Endangered Species Act (ESA). The Pettijohn Project area contains northern spotted owls and lands designated as Critical Habitat for the northern spotted owl. The Revised Recovery Plan for the Northern Spotted Owl\(^4\) provides guidelines and encourages the use of active management where the maintenance of disturbance resilience is prudent. In accordance with Recovery Plan direction, the Pettijohn Project was designed to reduce fire hazard conditions while promoting the development and maintenance of old-growth habitat components.

This ROD is based on information and analyses found in the associated Final Environmental Impact Statement (FEIS), the Supplement to the Socioeconomic Specialist Report, and Supplement to the Fire and Fuels Specialist Report. The FEIS contains the detailed analysis of two alternatives and considers but eliminates from detailed analysis four other alternatives. The Supplement to the Wildlife Biological Assessment (located in Appendix C of the FEIS), includes proposed treatments to further minimize

\(^2\) USDA (U.S. Department of Agriculture) and USDI (U.S. Department of Interior), Forest Service, Bureau of Land Management. 1994. Record of decision for amendments to Forest Service and Bureau of Land Management planning documents within the range of the northern spotted owl: Standards and guidelines for management of habitat for late-successional and old-growth forest related species within the range of the northern spotted owl. April 13.


potential impacts to the northern spotted owl and habitat and contains updated information on private land activities and northern spotted owl survey information.

**Purpose and Need**

Old-growth forest in the portion of the Clear Creek LSR that lies in the Pettijohn Project area accounts for approximately 2,904 acres or 27% of the land capable of developing old-growth habitat. Mature forest within this portion of the Clear Creek LSR accounts for approximately 62% of the capable land. As fire occurrence in the Klamath Mountains has declined due to fire suppression, changes in vegetation structure have become evident. The Clear Creek LSR, including the Pettijohn Project area, is dominated by mature (80 to 110 year-old) conifer stands that have become overcrowded with tightly spaced trees, much of which is not providing high-quality old-growth habitat. Dense stand conditions contribute to unhealthy trees and reduced growth, even for existing scattered large/old conifers. Crown and foliage development is limited because not enough room and resources such as water and nutrients are available for the large number of trees. As the density in stands has increased, tree crown size has become smaller with less leaf or needle area to carry on photosynthesis; this has caused physiological stress to trees and is retarding the development of old-growth habitat elements such as large fire-resistant conifers, which also provide future large snags and logs, and viable hardwoods.

The purpose of and need for the action were determined by comparing existing conditions in the field with the desired future conditions as described in the Clear Creek LSR Assessment\(^5\). This comparison identified the following basic management objectives:

- Reduce fuel loading within existing and developing old-growth habitat and develop strategic locations for fire management. Fuels would be reduced to levels that improve the likelihood that wildfire would be non-lethal to dominant and co-dominant trees in existing and developing old-growth habitat.
- Provide for increased firefighter safety and effectiveness during future wildfires.
- Accelerate the development of old-growth habitat conditions that are sustainable over time.

All actions associated with this project are consistent with the Forest Plan.

**DECISION**

Based on my review of the Pettijohn Project FEIS, I have decided to implement Alternative 2 with modifications. The alternative with modifications is hereafter referred to as the “selected alternative.” The selected alternative includes: Thinning from below on approximately 958 acres of overly dense conifer stands, creation of fuel management zones (FMZ) on 1,846 acres adjacent to approximately 36 miles of existing roads, prescribed burning on 101 acres, and hand thinning, piling and burning on 11 acres.

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addition, 2.3 miles of road will be decommissioned, 36 short-term landings (each less than ¼ to ½ acres in size) will be constructed and 0.95 miles of temporary roads will be used to access landings.

I have decided to defer treatment of nesting-roosting habitat in recently occupied owl core areas (0.5 mile buffer around northern spotted owl nest sites). As the deferred areas are not going to be implemented as part of this decision, further consultation with the U.S. Fish and Wildlife Service would occur prior to making a decision to implement the deferred units. Deferment of these areas resulted in a reduction of the total number of acres treated (from 3,212 acres to 2,916 acres).

In response to further collaboration with interested parties during the objection process, I have also decided to incorporate additional resource protection measures as modifications under the selected alternative, including:

- No trees above 20 inches in diameter at breast height will be cut within northern spotted owl core areas and riparian reserves;
- Only manual thinning (no mastication) will occur within FMZ riparian reserves; and
- No new skid roads will be allowed within riparian reserves.

All practical means to avoid or minimize environmental harm from the selected alternative have been adopted through resource protection measures, monitoring and best management practices (BMPs). All resource protection measures and BMPs will be implemented as specified in Section 2.4 and Appendix F of the FEIS. Monitoring will be conducted to track changes in Fire Regime Condition Class (FRCC) within treated areas and monitoring will be designed to provide opportunities for stakeholder participation in accordance with HFRA. Details of the HFRA monitoring are outlined in Section 2.5 of the FEIS.

**DECISION RATIONALE**

The potential effects of the selected alternative are fully analyzed and disclosed in the FEIS and associated specialist reports. Actual effects to resources will be less than disclosed in Alternative 2 due to a reduction in treatment area. Three supplemental resource reports were developed with the modifications incorporated to inform me on how the modifications affect implementation of the project (wildlife, fire/fuels and socioeconomics). My decision is based on a thorough review of all alternatives, the affected environment and environmental consequences in the FEIS and associated project record documents.

My decision takes into account public and agency comments received throughout the planning process. Issues developed from public comment are defined and identified in Section 1.8 of the FEIS and in Appendix H of the Draft Environmental Impact Statement (DEIS). Opportunities for public comment include proposal development and scoping prior to analysis, comment period after release of the DEIS, and an objection period after release of the FEIS.

**Attainment of Purpose and Need**

The selected alternative has been determined to best meet the following three project objectives stated in the purpose and need while minimizing environmental effects. Indicators best describing the attainment of project and purpose and need are displayed in Table 1.
Fuels Reduction

The selected alternative will reduce fuel loading within existing and developing old-growth habitat. Thinning in mature stands will reduce the likelihood of crown fire as shown in modeled simulations disclosed in the FEIS and supplemental fire/fuels specialist report. Fuels treatments have been strategically located around and within old-growth habitat while minimizing changes to the character of the old-growth habitat. Fire management and suppression response will be improved by creating FMZs along roads within the LSR. Treated areas will have a better chance of retaining live dominant and co-dominant trees, as well as other key habitat components, after a fire event.

Thinning from below will reduce the risk of losing current and developing old-growth habitat to fire. By limiting tree removal to maintain appropriate canopy cover, retaining key habitat components such as large trees, species diversity, snags and down logs which contribute to quality northern spotted owl habitat, and deferring treatment of nesting-roosting habitat in owl cores, short term negative effects on northern spotted owls will be minimized. While the proposed Alternative 2 analyzed in the Pettijohn Project FEIS includes thinning and FMZ treatments within nesting-roosting habitat in owl core areas, these treatments have been deferred. Future fuels treatments within these deferred areas will involve further consultation with the U.S. Fish and Wildlife Service and would be addressed under a separate Record of Decision.

Firefighter Safety

Fuel treatments will result in reduced fire hazard and reduced fire behavior. Vegetation removal and slash treatments will reduce flame lengths resulting in lower fireline intensities and behavior. Reductions in ladder fuels and crown bulk density will lessen the chances of crown fires and will reduce flaming front speeds. The strategic location of treatments along roadsides will provide for safer passage in and out of areas and provide for safer travel when accessing and retreating from wildfires.

The creation of FMZs will allow for more effective and safer firefighting by providing tactical advantages including points of fire control and safer access and escape to/from burning areas. Reduced fireline intensity will allow safer direct control methods and reduce erratic fire behavior.

Old-growth Habitat Improvement

In addition to improving the sustainability of treated stands due to reduced fire hazard and insect susceptibility after implementation, thinning treatments will also encourage and accelerate the development of old-growth conditions in mature stands by reducing competition between trees. Reducing density of existing vegetation results in more water, nutrients, sunlight and growing space available to the remaining trees (conifers as well as hardwoods). Additional resources provide an improved competitive advantage and contribute to accelerated growth of residual trees resulting in the development of larger trees in the overstory over time faster than without treatment. Proposed thinning will reduce competition for the largest/oldest trees and viable hardwoods thereby prolonging their persistence in the stands and maintaining or increasing growth rates of mature trees.

As the Pettijohn Project utilizes a thinning from below prescription, trees designated for removal would start with the smallest, least healthy conifers and progressively involve larger trees until the desired condition is achieved. In addition to retention of large trees and a relatively dense canopy closure (no less
than 50% in foraging habitat and 60% in all other stands), key habitat components such as large snags and
down woody debris, vertical structure and species diversity would also be maintained at the greatest level
that is likely to be sustainable in the event of a late summer wildfire.

All treatments work together to most effectively reduce the risk of loss due to wildfire, thereby
prolonging its effectiveness as late-successional habitat, and accelerate the development of old-growth
characteristics within the Clear Creek LSR.

PUBLIC INVOLVEMENT

Forest personnel are routinely involved in updating, coordinating, and implementing the Trinity County
Community Wildfire Protection Plan in coordination with the Trinity County Fire Safe Council (the
group that manages the plan). A preliminary proposal for treatment of the portion of the Clear Creek LSR
south of Trinity Lake was presented to the Trinity County Fire Safe Council at their May 26, 2005
meeting for coordination and collaboration in project development to meet both Forest and Trinity County
Community Wildfire Protection Plan objectives in this area.

Since April 2007, the project has been listed in the Forest Schedule of Proposed Actions and Program of
Work. Relevant project information was first posted on the Forest website in October 2008 and can be
found at http://www.fs.fed.us/nepa/project_content.php?project=14323. The Forest sent out
correspondence regarding the Pettijohn Project in a letter introducing the project and inviting public to
participate in the continued development of this habitat improvement and fuels reduction project at an
open-house meeting held on November 12, 2008. At the meeting, the Forest described the preliminary
purpose and need and proposed action for the project, and received input from the public. Comments and
suggestions provided by persons at the meeting and submitted by persons who were unable to attend the
meeting were used, in part, to design the proposed action.

The Notice of Intent to prepare an EIS was published in the Federal Register (Vol. 73, No. 245) on
December 19, 2008. The Notice of Intent requested public comment on the proposed action from
December 20, 2008 to January 20, 2009. A legal notice was printed in two local newspapers, the Redding
Record Searchlight (December 25, 2008) and the Trinity Journal (December 24, 2008).

The Forest held numerous field trips with the USFWS to discuss this project. Conservation Congress
scheduled a meeting for May 6, 2009 to discuss several proposed projects in the area including the
Pettijohn Project. The Forest prepared maps and scheduled personnel to attend this meeting. The
Conservation Congress cancelled on May 2, 2009; it was not rescheduled.

On May 25, 2010 a public meeting for all interested persons was held at the Weaverville Ranger District
in Weaverville, California for a briefing and discussion of the Pettijohn Project proposal before the
release of the DEIS. Individual invitations were forwarded to all persons who had expressed interest in
the project during project development and public scoping and notices were published in the Trinity
Journal and the Record Searchlight. Based on public comments during the scoping period, four additional
alternatives were developed but were eliminated from detailed study because they would not meet the
purpose and need for the project (see Alternatives Considered section below for more details).
On May 6, 2011, the notice of availability for the DEIS was published in the Federal Register and the legal notice for comment was published in the Redding Record Searchlight (May 11, 2011) and Trinity Journal (May 11, 2011). Copies of the DEIS were mailed on May 4, 2011 to the federal, state and local agencies and the public listed in Chapter 4, Section 2 of the DEIS. On May 4, 2011 letters were also mailed to a broader list of public to provide notification of the opportunity to comment on the Pettijohn Project DEIS. The comment period for the DEIS ended on June 20, 2011. The Forest Service received comments from one government agency, one timber company, and seven public organizations. A summary of comments received on the DEIS and Forest Service responses are found in Appendix I of the May 2012 Final Environmental Impact Statement.

In compliance with HFRA, a 30-day objection period followed the publication of the notice of availability for the FEIS in the Redding Record Searchlight on June 4, 2012. Three objections were filed during the objection period: the Environmental Protection Information Center/Klamath-Siskiyou Wildlands (EPIC), the American Forest Resource Council (AFRC), and the Conservation Congress/Citizens for Better Forestry (Conservation Congress). Public meetings were held on July 17 and July 24, 2012 in an attempt to resolve the objections. During these meetings objectors were asked to summarize their objections and describe modifications to the action that would be necessary in order for the groups to withdraw their objections.

The AFRC requested a letter stating that the deferment of treatments in high quality northern spotted owl habitat would not be precedent setting, and requested that the Forest Supervisor not accept any of the modifications requested by other objectors that would reduce treatment effectiveness. I agreed to write a letter stating that deferment would not be precedent setting. EPIC requested several changes to the design of the project, three of which were adopted as part of the modified selected alternative (see Decision, pages 3-4 above). Conservation Congress requested that the project FEIS be withdrawn with additional analysis to address the objections. Based on review of the objection issues submitted by Conservation Congress, I did not feel that additional analysis was necessary. None of the objections were fully resolved.

**ALTERNATIVES CONSIDERED**

In addition to the selected alternative, I considered six other alternatives, which are discussed below. Alternative 2 with modifications, the selected alternative, is the environmentally preferred alternative. A more detailed comparison of the alternatives can be found in the FEIS on pages 17-38.

**Alternative 1 – No Action Alternative**

This alternative would result in none of the proposed management activities being implemented within the project area at this time. Hazardous fuels conditions are found throughout the project area. The no action alternative would result in higher fuel loading over time, an increased likelihood of loss of old-growth habitat components due to high-intensity wildfire, and increased risk to fire fighters during a wildfire event. This alternative would not accelerate the development of old-growth components. Therefore, the no action alternative does not adequately meet the project purpose and need.
Alternative 2 - Proposed Action

The proposed action included thinning from below on approximately 1,155 acres of overly dense conifer stands including approximately 96 acres of thinning in riparian reserve land allocations; development of a strategically located FMZ network adjacent to roughly 36 miles of existing roads, totaling about 1,995 acres; fuels reduction by prescribed burning (101 acres) and hand thinning, piling and burning (11 acres) in two high-risk areas outside of the Clear Creek LSR; decommissioning 2.3 miles of little-used roads that are having negative effects on fish and water quality or are disproportionately difficult to maintain; and construction of no more than 36 small short-term landings. The proposed action contained no new road construction or reconstruction but did use 0.95 miles of temporary roads to access short-term landings. Currently, there is no agreed upon method for conducting an explicit analysis of the short-term impacts of treatments against the long-term ecological benefits. Though stand modeling shows increases in stand resiliency and greater probability of maintaining high-value habitat after disturbance, currently we do not have an agreed upon approach to explicitly consider the value of the increased stand and landscape level resiliency relative to the risk of disturbing known spotted owls occupying high-value habitat. This alternative was modified to address this uncertainty, resulting in the selected alternative.

Alternative 3 – Defensible Fuel Profile Zone Alternative (eliminated from detailed study)

This alternative was designed collaboratively with the Watershed Resource Training Center during the public process. It essentially created shaded fuel breaks along several areas where FMZ treatments were located in the original Alternative 2 from the DEIS. Fire modeling showed that the effectiveness of the treatments would be similar to those of the FMZ treatments but that the environmental impacts to northern spotted owl habitats would be much greater due to canopy cover reductions. There does not appear to be an adequate improvement between the more intensively treated defensible fuel profile zone (DFPZ) and the proposed expanded FMZ treatments to justify the development of a DFPZ within the current project area. Although effective at reducing fire severity, DFPZ construction would reduce canopy closure below suitable northern spotted owl habitat conditions, thereby downgrading roughly 500 acres of nesting, roosting and foraging habitat within the Clear Creek LSR. The reduced canopy would need to be sustained through time to maintain the DFPZ’s effectiveness. This long-term reduction in northern spotted owl habitat within the Clear Creek LSR is counter to this project’s purpose and need. For this reason and the fact that the DFPZ was not significantly more effective than the FMZ, this alternative was not analyzed in detail, by agreement with the Watershed Resource Training Center.

Alternative 4 – Wildland Urban Interface (eliminated from detailed study)

The WUI alternative was recommended during project development by Conservation Congress. This alternative would propose activities only in the WUI to protect at-risk communities from wildfire with a focus on implementing fuels reductions around each house in the WUI and exclusion of action within the Clear Creek LSR. This alternative focuses solely on at risk communities within the WUI portion of the Pettijohn Project area and does not respond well to project objectives to meet (or move toward) fuels reduction, increased firefighter safety and old-growth habitat objectives for the Pettijohn portion of the Clear Creek LSR (FEIS Section 1.3). During the course of project development, the WUI boundaries were modified as part of development of the Community Wildfire Protection Plan, but still do not cover a significant portion of the Clear Creek LSR. Treatments focused only along the edges of the project area.
would do little to decrease fire hazard and crown fire potential within the Clear Creek LSR, would only improve firefighter safety and effectiveness in the southern half of the Trinity Dam FMZ, and would not result in accelerated development of old-growth characteristics. Restriction of activities to occur only outside the LSR eliminates the ability to move towards the desired conditions for the LSR and does not achieve the purpose and need of this project. Therefore, this alternative was eliminated from detailed study.

**Alternative 5 – Prescribed Burning, No Thinning Alternative (eliminated from detailed study)**

The Conservation Congress requested the development of an alternative that would not remove trees by thinning (whether alive or dead) with the justification that thinning is not a proven method for reducing fire hazard. They commented that post activity fuel treatments may exacerbate fire behavior. Their suggested alternative would use prescribed burning as the only treatment for fuels reduction.

An alternative that would only use prescribed burning for fuels reduction and no thinning would not meet the purpose and need for the project because the use of prescribed fire alone, under current fuel conditions, would have a high potential for extreme fire behavior and mortality similar to the no action alternative. The current canopy closure in the project area is 70%–90%, ladder fuels are very dense consisting of 2- to 14-inch DBH trees dominated by shade-tolerant species, and dead and down fuels range up to 30 tons/acre. With high fuel loading and the accumulation of smaller trees that act as fuel ladders, there is increased likelihood of extreme fire behavior resulting in high severity effects such as greater mortality in larger trees, soil heating or scorching, and total duff consumption resulting in erosion. In addition, there is a greater likelihood of an escaped prescribed burn which may be dangerous and costly to suppress.

**Alternative 6 – Small Diameter Tree and Brush Alternative (eliminated from detailed study)**

This alternative was proposed by Conservation Congress during scoping. They proposed that “another alternative be developed that emphasizes small diameter trees and brush removal that would actually lower fire risk in the Clear Creek LSR as well as protect WUI communities.”

The proposed action alternative was designed using a thinning from below management prescription. A thinning from below treatment mimics mortality due to surface fire or inter-tree competition, whereby the smallest conifer trees are designated for removal in order to reach the desired fuels conditions and residual canopy cover. As the proposed action emphasizes small diameter tree removal (little brush occurs in the stands proposed for thinning) larger trees are recognized as a key component of late-successional and old-growth forest habitat and are thus favored for retention.

This alternative used a 12-inch diameter limit for tree removal. Modeling depicting post-treatment fire behavior indicated that this alternative would not adequately meet the purpose and need due to high levels of canopy loss as a result of a fire event.
Summary of Key Effects by Alternative

Key effects for the no action, the proposed action and the selected alternative are displayed in Table 1. Treatments described for the proposed action and selected alternative were designed to maintain and promote six key habitat components: (1) large, old overstory trees, (2) large snags, (3) coarse woody debris, (4) dense canopy closure, (5) vertical structure, and (6) species diversity including hardwoods. The analysis presented in the FEIS (p.46–54, 69–78, and 88–92) demonstrates the short- and long-term effects of the individual treatment types on the habitat components and fire hazard. By retaining and promoting large trees, the treatments will result in improved health and accelerated development resulting in more trees at larger diameters than foregoing treatment. All indicators analyzed for fire hazard show benefits from the treatments in reducing threats to retained trees and firefighters under a wildfire scenario. Additionally, the FRCC will improve as a direct result of the treatments.

While treatments will have many long-term positive effects, there are potential short-term adverse impacts or uncertainty of impacts to northern spotted owls. The selected alternative will have a positive effect on the broader landscape and current and developing habitat while minimizing potential negative impacts to northern spotted owls through site specific resource protection measures. For example, key habitat components such as large trees, snags, logs, and structural diversity will be preserved while reducing fuel loading and consequently also reducing the risk of loss to high-intensity wildfire. Though fire hazard risks to high-quality habitat components within the northern spotted owl core areas will not be directly affected by the selected alternative (as some treatments have been deferred), there will still be an indirect benefit through the treatment of adjacent areas that reduces the potential development and spread of active crown fire.

The benefits under the selected alternative are only slightly diminished as a result of deferment of treatment acres. Substantial benefits will result from the selected versus the no action alternative. Passive and active crown fires would be reduced on 2,320 acres under the selected alternative.

Table 1 Comparison of Alternatives

<table>
<thead>
<tr>
<th>Effect or Output</th>
<th>No Action</th>
<th>Proposed Action</th>
<th>Selected Alternative</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acres of habitat treated to promote growth and restore late-successional forest (mid- and late-successional forest)</td>
<td>0</td>
<td>1,155 acres</td>
<td>958 acres</td>
</tr>
<tr>
<td>Number of acres treated to accelerate development of old-growth forest components</td>
<td>0</td>
<td>874 acres</td>
<td>774 acres</td>
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<tr>
<td>Acres of FMZs developed to reduce wildfire threat</td>
<td>0</td>
<td>1,995 acres</td>
<td>1,846 acres</td>
</tr>
<tr>
<td>Acres of fuel treatment to reduce ground and ladder fuels, both activity and natural</td>
<td>0</td>
<td>3,262 acres</td>
<td>2,916 acres</td>
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<td>Acres of underburning in dense brush to reduce fire hazard around a popular fishing access area</td>
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<td>101 acres</td>
<td>101 acres</td>
</tr>
<tr>
<td>Acres of hand thinning, piling and burning around a high use public rest area</td>
<td>0</td>
<td>11 acres</td>
<td>11 acres</td>
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### Effect or Output

<table>
<thead>
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<th>Effect or Output</th>
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<th>Proposed Action</th>
<th>Selected Alternative</th>
</tr>
</thead>
<tbody>
<tr>
<td>Percent of project area treated to reduce ground and ladder fuels including habitat treatments and FMZs above&lt;sup&gt;1&lt;/sup&gt;</td>
<td>0</td>
<td>25%</td>
<td>22%</td>
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<td>Miles of temporary road constructed to access short term landings within thinning units</td>
<td>0</td>
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<td>0.95 miles</td>
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<tr>
<td>Miles of National Forest System road decommissioning</td>
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<td>2.3 miles</td>
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<tr>
<td>New road construction</td>
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<td>0</td>
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### Effects to habitat within northern spotted owl home range (1.3 mile buffer around nest)

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<tr>
<th>Type of habitat</th>
<th>Effect on habitat</th>
<th>Acres</th>
</tr>
</thead>
<tbody>
<tr>
<td>High quality nesting and roosting (acres)</td>
<td>Removed</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Downgraded</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Degraded</td>
<td>0</td>
</tr>
<tr>
<td>Moderate quality nesting and roosting (acres)</td>
<td>Removed</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Downgraded</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Degraded</td>
<td>0</td>
</tr>
</tbody>
</table>

### Effects to habitat within northern spotted owl core areas (0.5-mile buffer around nest site)

<table>
<thead>
<tr>
<th>Type of habitat</th>
<th>Effect on habitat</th>
<th>Acres</th>
</tr>
</thead>
<tbody>
<tr>
<td>High quality nesting and roosting (acres)</td>
<td>Removed</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Downgraded</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Degraded</td>
<td>0</td>
</tr>
<tr>
<td>Moderate quality nesting and roosting (acres)</td>
<td>Removed</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Downgraded</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Degraded</td>
<td>0</td>
</tr>
</tbody>
</table>

### Fire

<table>
<thead>
<tr>
<th>Fire Type</th>
<th>Acres (percentage)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Surface fire</td>
<td>10,066 (47%)</td>
</tr>
<tr>
<td></td>
<td>12,626 (59%)</td>
</tr>
<tr>
<td></td>
<td>12,386 (57%)</td>
</tr>
<tr>
<td>Passive crown fire</td>
<td>6,168 (29%)</td>
</tr>
<tr>
<td></td>
<td>4,747 (22%)</td>
</tr>
<tr>
<td></td>
<td>4,832 (21%)</td>
</tr>
<tr>
<td>Active crown fire</td>
<td>5,143 (24%)</td>
</tr>
<tr>
<td></td>
<td>4,004 (18%)</td>
</tr>
<tr>
<td></td>
<td>4,159 (19%)</td>
</tr>
</tbody>
</table>

### Fire Regime Condition Class

<table>
<thead>
<tr>
<th>Fire Regime Condition Class</th>
<th>Acres (percentage)</th>
</tr>
</thead>
<tbody>
<tr>
<td>FRCC I&lt;sup&gt;2&lt;/sup&gt;</td>
<td>3 (&lt;1%)</td>
</tr>
<tr>
<td></td>
<td>3,116 (15%)</td>
</tr>
<tr>
<td></td>
<td>2,810 (13%)</td>
</tr>
<tr>
<td>FRCC II&lt;sup&gt;3&lt;/sup&gt;</td>
<td>20,972 (99%)</td>
</tr>
<tr>
<td></td>
<td>17,859 (85%)</td>
</tr>
<tr>
<td></td>
<td>18,162 (86%)</td>
</tr>
<tr>
<td>FRCC III&lt;sup&gt;4&lt;/sup&gt;</td>
<td>220 (&lt;1%)</td>
</tr>
<tr>
<td></td>
<td>129 (&lt;1%)</td>
</tr>
<tr>
<td></td>
<td>132 (&lt;1%)</td>
</tr>
</tbody>
</table>

<sup>1</sup> Includes acres of prescribed understory fire and hand fuels reduction relative to amount of acres of Forest Service lands within the project area.

<sup>2</sup> Ecosystems with low (<33%) departure from a defined reference period (or historic range of variability).

<sup>3</sup> Ecosystems with moderate (33-66%) departure from reference conditions.

<sup>4</sup> Ecosystems with high (>66%) departure from reference conditions.
Environmentally Preferred Alternative

NEPA implementing regulations require agencies to specify the alternative or alternatives which are considered to be environmentally preferable, 40 CFR 1505.2(b). In addition, Forest Service NEPA policy (FSH 1909.15, Section 05) defines “environmentally preferable” as:

the alternative that will best promote the national environmental policy as expressed in NEPA's section 101 (42 USC 4321). Ordinarily, the environmentally preferable alternative is that which causes the least harm to the biological and physical environment; it also is the alternative which best protects and preserves historic, cultural, and natural resources. In some situations, there may be more than one environmentally preferable alternative (36 CFR 220.3).

Section 101 of the NEPA describes national environmental policy, calling on federal, state and local governments and the public to “create and maintain conditions under which man and nature can exist in productive harmony.” Section 101 further defines this policy in six broad goals, to:

1. Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
2. Assure for all Americans safe, healthful, productive and esthetically and culturally pleasing surroundings;
3. Attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences;
4. Preserve important historic, cultural, and natural aspects of our national heritage, and maintain wherever possible, an environment which supports diversity and variety of individual choice;
5. Achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life’s amenities; and
6. Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

Based on the description of the alternatives considered in detail in the FEIS and this ROD, I believe the selected alternative best meets the goals of Section 101 of the NEPA and is therefore the environmentally preferable alternative for this proposed federal action.

FINDINGS REQUIRED BY OTHER LAWS AND REGULATIONS

My decision is consistent with relevant law, regulations and agency policy. The following discussion summarizes this compliance.

The FEIS fulfills the requirements for environmental analysis found in NEPA and in the Council on Environmental Quality implementing regulations at 40 CFR Parts 1500-1508. NEPA at 40 CFR 1502.25 (a) directs, “to the fullest extent possible, agencies shall prepare environmental impact statements concurrently with and integrated with…other environmental review laws and executive orders.”
National Forest Management Act. The National Forest Management Act (NFMA) requires projects to be consistent with the Forest Plan. My decision to implement fuels reduction and thinning activities, along with connected road and landing activities, is consistent with the intent of the Forest Plan’s long-term goals (Forest Plan, pages 4-4 through 4-6). The project was designed to conform to Forest Plan goals, desired conditions, and standards and guidelines for the following Management Prescriptions: VII Late-Successional Reserve and IX Riparian Reserves (Forest Plan, pages 4-37 through 4-44, and 4-53 through 4-60). Consistency with Forest Plan goals, desired conditions, and standards and guidelines is addressed throughout the EIS and supporting project record documents. The project is consistent with Forest Plan Standard and Guideline (page 4-62) “Provide for retention of old-growth fragments in watersheds where little remains,” because it will not remove any old-growth, thus will not reduce the amount in any watershed. The project would also decrease the likelihood that old-growth and late successional stands would be lost to stand replacing fire thus contributing to the old-growth standard and guideline into the future.

The NFMA requires projects to be consistent with minimum specific management requirements as provided in the implementing regulations at 36 CFR 219.12 and described in the Forest Service Manual 1921.12a. The project will not result in any irreversible impacts. Vegetation removed and fuels treatments will constitute loss of production of individual trees or groups of trees but will not result in loss of productivity of entire stands of vegetation. The production lost from the creation of short-term landings, temporary roads and main skid trails would be irretrievable, but the action would be reversible. I find the Selected Alternative to be consistent with the provisions of the NFMA.

Management Indicator Assemblages. I find the selected alternative complies with the Forest Plan for Management Indicator Assemblage (FEIS p. 80-81). The analysis presented in the FEIS indicates that although project implementation will result in changes to qualitative features of assemblage habitat such as reduction in canopy closure, tree and snag density, treated areas will continue to provide the same quantity and distribution of each management indicator assemblage after project implementation. The project is not likely to result in any meaningful change to population trends and habitat availability for any of the management indicator assemblage representative species (brown creeper, Nashville warbler, or red-breasted nuthatch).

Survey and Manage. This decision is consistent with the January 2001 Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines (USDA Forest Service & USDI Bureau of Land Management, 2001) . The project is in compliance with the list of Survey and Manage species in the 2001 ROD (Table 1-1, Standards and Guidelines, page 41-51). The project is also consistent with the guidelines and list of species and their category assignments found in the Settlement Agreement finalized and filed on July 6, 2011, Conservation Northwest et al. v. Sherman, Case No. C08-1067-JCC (W.D. Wash).

Aquatic Conservation Strategy. The selected alternative meets and will not prevent attainment of all nine objectives of the Aquatic Conservation Strategy (ACS) as discussed in the FEIS (Appendix D). All harvest units have been designed with resource protection measures that conform to Forest Plan guidance in meeting the ACS and Riparian Reserves Standards and Guidelines. The FEIS analyzed watershed effects at the project level, and 5th, 6th, 7th and 8th field watershed scales. The project area is not located in
a Key Watershed. The three 5th field watersheds within the project area have been thoroughly analyzed in the fisheries and hydrology sections of the FEIS. The selected alternative meets, does not adversely affect, or does not retard or prevent attainment of objectives at the 5th field watershed scale (FEIS, Appendix D).

**Healthy Forests Restoration Act.** The Pettijohn Project is authorized under Section 102 (a) (5) (A-C) Authorized Hazardous Fuel Reduction Projects of Healthy Forests Restoration Act. Section 102 (a) (5) (B) authorizes projects that will provide enhanced protection from catastrophic wildfire for threatened or endangered species and their habitat. Post-treatment monitoring associated with Healthy Forests Restoration Act is discussed in Section 2.5 of the FEIS.

**Endangered Species Act.** I find the selected alternative to be consistent with the ESA. Analyses of federally-listed species and consultation with the USFWS and the National Marine Fisheries Service have been completed, fulfilling Section 7 of the ESA consultation requirements (19U.S.C. 1536 (c)).

The Forest Service met its ESA Section 7 consultation obligations with the US Fish and Wildlife Service by preparing a project-level Wildlife Biological Assessment. The Forest formally initiated consultation on the Pettijohn Project with the US Fish and Wildlife Service on April 1, 2010, and received a Biological Opinion from them on May 7, 2012. The Wildlife Biological Assessment concludes that actions may affect and would likely adversely affect the northern spotted owl (and the primary constituent elements of designated Critical Habitat) through the reduction of habitat quality, however that the proposed actions are likely to benefit the northern spotted owl through a reduction of the risk and hazard of catastrophic loss of suitable habitat to late-season wildfire. Upon analyzing the status of the species, the environmental baseline, the effects of the action as well as the cumulative effects, the USFWS concurred with the determination in the Biological Assessment. Although it is expected that two pairs of northern spotted owls may experience harassment, the USFWS concluded that the Pettijohn Project is not likely to jeopardize the continued existence of the northern spotted owl. Pursuant to 50 CFR 402.14 (I) (ii), reasonable and prudent measures are those the USFWS considers necessary to minimize the effects of the incidental taking. As part of the Pettijohn Project design the USFWS believes the Forest has taken steps to avoid and minimize impacts to late successional habitat and northern spotted owl. By doing so, the take of spotted owls has been minimized by compliance with measures incorporated into the project design. It is not anticipated to compromise the conservation and recovery strategies established by the Northwest Forest Plan and USFWS, or contribute to an appreciable reduction in the likelihood of survival and recovery of the northern spotted owl in the wild by reducing the owl numbers, reproduction, or distribution.

On December 4, 2012, a Critical Habitat revision changed habitat unit and subunit boundaries across the range of the northern spotted owl. While issued prior to this revision, the May 2012 Biological Opinion based its analysis of Critical Habitat on both the 2008 rule and the anticipated 2012 rule. Considering the four triggers for reinitiation identified in Section 7 regulations and documented by the Forest Biologist6, I have decided that reinitiation of consultation for the Pettijohn Project is not warranted at this time.

6 Review of the four triggers resulted in the following conclusions: 1) the amount or extent of take has not been exceeded, 2) the 2012 critical habitat revision was fully considered, 3) the action has not been modified in a manner to cause effects to listed species or critical habitat that have not been previously considered, and 4) the revision of critical habitat completed in 2012 was considered in the Biological Opinion and no new critical habitat (areas that were not previously designated critical habitat) will be affected by the project.
The Forest Service met its ESA Section 7 consultation obligations with National Marine Fisheries Service by preparing a project-level Fisheries Biological Assessment. The Forest initiated consultation on the Pettijohn Project with the National Marine Fisheries Service on August 23, 2011, and received a Letter of Concurrence from them on October 7, 2011. The Fisheries Biological Assessment concludes that actions may affect but are not likely to adversely affect Southern Oregon/Northern California Coast (SONCC) coho salmon and their Critical Habitat.

**Magnuson-Stevens Fishery Conservation and Management Act.** The Pettijohn Project contains Essential Fish Habitat under the Magnuson-Stevens Act for coho and Chinook salmon but it would not be adversely affected by the selected alternative.

**Clean Water Act.** Protection of water quality in this part of California is delegated to the Regional Water Quality Control Board, North Coast Region (Regional Water Board). I find the project to be consistent with the Porter-Cologne Water Quality Control Act (California Water Code §13000 et seq.), and the Water Quality Control Plan for the North Coast (Basin Plan). Equipment exclusion zones will minimize the direct and indirect potential for erosion and water quality impacts. The great majority of treatments are located outside of Riparian Reserves. Approximately 96 acres of thinning treatments are located within Riparian Reserves but modeling indicates that risk ratios indicative of potential for water quality impacts will be maintained within acceptable thresholds.

The incorporation of BMPs (recently updated per state waterboard direction in a new Water Quality Management Handbook in December 2011) into project design ensure compliance with Section 208 of the federal Clean Water Act and protect beneficial uses of water quality and anadromous fish while meeting the conditions and eligibility requirements of the Categorical Waiver. The BMPs are certified by the State Water Quality Resources Control Board and approved by the U.S. Environmental Protection Agency. As projects must comply with the California Regional Water Board’s *Categorical Waiver for Discharges Related to Timber Harvest Activities on Federal Lands Managed by the United States Department of Agriculture*, Forest Service in the North Coast Region, Order No. R1-2004-0015 (Waiver), the Forest will obtain Waiver coverage prior to implementation.

**Clean Air Act.** I find the selected alternative to be consistent with the Clean Air Act. Smoke management plans will be submitted to the North Coast Unified Air Quality Management District, and burning days will only occur when prevailing winds deliver smoke away from a Class 1 area. A burn permit will be in place with the air district prior to burning. As a result there will not be any measurable impacts to Class 1 airsheds. No ground disturbing activities are expected in areas of naturally occurring asbestos, thus no impacts to air quality from asbestos are expected.

**National Historic Preservation Act.** I find the selected alternative to be consistent with the National Historic Preservation Act (NHPA) as archaeological field inventories were conducted in the project area and no new prehistoric cultural sites were found. There are seven previously recorded sites within the project area. Two of those are outside of project units and the other five have been flagged for avoidance using standard protection measures in compliance with the Region 5 Programmatic Agreement for Compliance with Section 106 of the NHPA (Provision III. D.(2)). The Pettijohn Project is consistent with the Programmatic Agreement for the California State Historic Preservation Office. The selected alternative will not result in any negative impacts to cultural resource sites (FEIS Section 3.10).
Environmental Justice. Executive Order 12898 relating to Environmental Justice requires an assessment of whether implementation of this decision would disproportionately affect minority or low income populations. The socio-economic analysis found that adverse environmental effects and effects on human health due to this project are negligible or non-existent. The small size of the proposed action indicates that it does not appear to have disproportionately high or adverse effect on the minority or low-income population. The selected alternative will have a direct positive impact on the low-income population of Trinity County by providing logging and manufacturing jobs. Due to the small size of the thinning operation, however, there will be no adverse or positive cumulative impacts to the low-income, elderly, or minority population of Trinity County.

Floodplains. Executive Order 11988 requires that projects avoid floodplain impacts to the extent possible. This project is consistent with Executive Order 11988 since the project will not affect any floodplains, as none are present in the project treatment areas.

Weeds. Executive Order 13112 requires agency actions to prevent the spread of noxious weeds. This project is compliant with Executive Order 13112, as it requires equipment cleaning prior to entry on National Forest System lands and use of certified weed-free seed and straw is required when used for restoration of temporary roads, skid trails, landings and decommissioned roads.

IMPLEMENTATION

Administrative Review Opportunities

The Secretary of Agriculture established a pre-decisional administrative review process (objection process) for hazardous fuels reduction projects authorized by the HFRA (CFR, Title 36, volume 2, part 218). The objection process is the sole means by which administrative review of a proposed authorized hazardous fuel reduction project on National Forest System land may be sought. The objection process is open to individuals and organizations who submitted specific written comments related to the proposed authorized hazardous fuel reduction project during the scoping process or comment period on the draft EIS, in accordance with Council on Environmental Quality (CEQ) procedures in 40CFR 1506.10 (Sec 218.7[a]). The objection process was established for early participation and collaborative efforts, as well as resolution of concerns before a decision is made.

Projects prepared under HFRA are subject to the objection process which supersedes the Forest Service’s usual appeal process. The objection process (36 CFR part 218, subpart A) occurs after an environmental assessment or FEIS is completed and before a decision document is signed for an authorized hazardous fuel reduction project. The 30-day objection period for The Pettijohn LSR Project ran from June 4 through July 5, 2012.

Three objection letters were submitted to the Region 5 Reviewing Officer (Regional Forester) in response to the Pettijohn LSR Project; two by coalitions of environmental organizations (Environmental Protection Information Center/KS Wild and Conservation Congress/Citizens for Better Forestry) and one by timber industry representation (American Forest Resource Council). As the Responsible Official, I met with the objectors as well as other interested parties to discuss issues raised in their objection letters. Objection resolution meetings were held on July 17, 2012 and July 24, 2012. While some requests for relief were
granted, none of the Objectors withdrew their objections. These groups received a letter from the Reviewing Official (Ronald G Ketter, Deputy Regional Forester) describing the results of the pre-decisional administrative review. In each letter, the Reviewing Official concluded that Forest made reasonable and appropriate efforts to resolve the concerns that were brought forward while maintaining the balanced approach to managing the lands and meeting the purpose of the project.

I was instructed by the Reviewing Official to proceed with issuance of a Record of Decision for this project. There will be no further review of this project by any other Forest Service or U.S. Department of Agriculture official as per 36 CFR 218.11(b)(2).

The HFRA established that a person may bring a civil action challenging an authorized hazardous fuel reduction project in a federal district court only if the person has challenged the project by exhausting the administrative review process established by the Secretary of Agriculture. Section 106 of the HFRA establishes direction governing judicial review of lawsuits challenging hazardous fuel reduction projects authorized under the Act. The section requires lawsuits to be filed in the U.S. District Court where the project is located (Section 106(a)); encourages expeditious judicial review of authorized fuel-treatment projects (Section 106(b)); limits preliminary injunctions and stays to 60 days, subject to renewal. At each renewal, parties to the action shall provide the court with updated information on the project (Section 106(c) (1) and (2)); and directs courts to balance the impact of short- and long-term effects of undertaking the project when weighting the equities of any request for an injunction of an authorized hazardous fuel reduction project (Section 106(c)(3)).

Implementation Date

Implementation of this project can begin immediately. My intention is to implement this project through a stewardship contract as well as service contracts and agreements. Mitigations requiring seasonal operational restrictions for resource protection are identified in Section 2.4 of the FEIS; these restrictions limit the timing of implementation.

CONTACT

For additional information concerning this decision, contact: Keli McElroy, Forester, 3644 Avtech Parkway, Redding, California 96002, (530) 226-2354. Electronic copies of the Final Environmental Impact Statement and the Record of Decision are available at http://www.fs.fed.us/nepa/nepa_project_exp.php?project=14323

J. SHARDON HEYWOOD
Forest Supervisor
Shasta-Trinity National Forest

Date

13 Mar 13
Appendix A: Map – Pettijohn Project Selected Alternative
Appendix B: Documents added or updated since release of the FEIS

Baker, K. July 1, 2012. Objection to the Pettijohn Late-Successional Reserve Habitat Improvement and Fuels Reduction Project on the Shasta Trinity National Forest. Submitted to Reviewing Officer (Randy Moore) on behalf of Environmental Protection Information Center (lead) and Klamath-Siskiyou Wildlands Center. Letter is included in the Pettijohn Project Record, on file at the Shasta-Trinity National Forest Supervisor’s Office (Redding, CA).


Ketter, R. August 6, 2012. Objection Resolution Letter regarding Objection #12-05-00-9965-A218 filed on behalf of Conservation Congress (lead) and Citizens for Better Forestry regarding the Pettijohn LSR Habitat Improvement and Fuels Reduction Project. Letter is included in the Pettijohn Project Record, on file at the Shasta-Trinity National Forest Supervisor’s Office (Redding, CA).

Ketter, R. August 6, 2012. Objection Resolution Letter regarding Objection #12-05-00-9966-A218 filed on behalf of Environmental Protection Information Center (lead) and Klamath-Siskiyou Wildlands Center regarding the Pettijohn LSR Habitat Improvement and Fuels Reduction Project. Letter is included in the Pettijohn Project Record, on file at the Shasta-Trinity National Forest Supervisor’s Office (Redding, CA).

Ketter, R. August 6, 2012. Objection Resolution Letter regarding Objection #12-05-00-9967-A218 filed on behalf of the American Forest Resource Council regarding the Pettijohn LSR Habitat Improvement and Fuels Reduction Project. Letter is included in the Pettijohn Project Record, on file at the Shasta-Trinity National Forest Supervisor’s Office (Redding, CA).

Mai, C. July 20, 2012. Pettijohn Riparian Reserve Field Verification Findings. Riparian Reserve field review was in response to EPIC/KS Wild objection issues and is included in the Pettijohn Project Record, on file at the Shasta-Trinity National Forest Supervisor’s Office (Redding, CA).


Roche, K. July 2012. Pettijohn Objection Resolution Meeting(s) notes. Notes are included in the Pettijohn Project Record, on file at the Shasta-Trinity National Forest Supervisor’s Office (Redding, CA).

Shoemaker, L. January 2013. Updated Pettijohn LSR Habitat Improvement and Fuels Reduction Project Fire and Fuels Specialist Report Supplement. Report is included in the Pettijohn Project Record, on file at the Shasta-Trinity National Forest Supervisor’s Office (Redding, CA).
Shoemaker, L. August 2012. Fire/Fuels Citation Review for Pettijohn LSR Habitat Improvement and Fuels Reduction Project Objections. Report is included in the Pettijohn Project Record, on file at the Shasta-Trinity National Forest Supervisor’s Office (Redding, CA).

Svilich, R. July 1, 2012. Objection to the Pettijohn Late-Successional Reserve Habitat Improvement and Fuels Reduction Project (Pettijohn) on the Shasta Trinity National Forest. Submitted to Reviewing Officer (Randy Moore) on behalf of American Forest Resource Council. Letter is included in the Pettijohn Project Record, on file at the Shasta-Trinity National Forest Supervisor’s Office (Redding, CA).

Wolcott, K. February 2013. Consideration of Reinitiation of Consultation for the Pettijohn Late-Successional Reserve Project. Report is included in the Pettijohn Project Record, on file at the Shasta-Trinity National Forest Supervisor’s Office (Redding, CA).