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Department of
Agriculture

Forest
Service

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File Code: 1570

Appeal No.: 12-05-00-0010-A215

Date: June 22, 2012

Susan Britting
Sierra Forest Legacy
P.O. Box 377
Coloma, CA 95613

CERTIFIED - RETURN
RECEIPT REQUESTED

Dear Ms. Britting:

On May 14, 2012, you filed a Notice of Appeal (NOA) pursuant to 36 CFR 215. Sierra National Forest Supervisor Scott G. Armentrout signed the Record of Decision (ROD) approving Alternative 2 of the Greys Mountain Ecological Restoration Project Environmental Impact Statement (FEIS) on March 16, 2012.

I have reviewed the entire appeal record, including your written Notice of Appeal (NOA), the ROD, FEIS, and supporting documentation. I have weighed the recommendation from the Appeal Reviewing Officer and incorporated it into this decision. A copy of the Appeal Reviewing Officer's recommendation is enclosed. This letter constitutes my decision on the appeal and on the specific relief requested.

FOREST ACTION BEING APPEALED

The Sierra National Forest proposes silvicultural and fuel treatments within the Willow Creek and Fresno River watersheds, in the Southern Sierra Nevada. The project is immediately north of the community of Bass Lake, California and south of Soquel Meadow, east of Nelder Grove Historical Area and west of Graham Mountain. The project was developed to achieve ecological restoration objectives and protect communities in the Wildland Urban Interface (WUI) from wildfire. The ecological restoration goals of the Greys Mountain project is multi-faceted and includes the following: (1) increase forest resilience to insects, disease, and drought through prescribed fire and mechanical thinning treatments, (2) promote heterogeneity in forest structure for improving wildlife habitat, (3) decrease the occurrence of uncharacteristically severe wildfires and their impacts to ecosystems and watersheds, (4) promote native biodiversity, (5) restore degraded montane meadows, (6) improve habitat quality and connectivity for sensitive wildlife species, (7) decrease impacts of invasive species, (8) decommission and restore unneeded user defined vehicle trails, and (9) provide sustainable delivery of ecosystem services such as clean water and carbon sequestration, in an era of changing climate.

Current forest conditions in Greys Mountain Project Area, due to past management activities (including railroad and other harvesting operations, fire exclusion/suppression, housing development, etc.) have been changed from one of more open, drought resistant, pine dominated stands where fires were of frequent, low/moderate intensity to infrequent, high intensity to even



aged young growth, more fir and incense cedar dominated, fire excluded stands. Owing to these changes, forest stands have become less diverse, more homogenous, and more susceptible to uncharacteristically severe wildfire and drought. Current forest stands are typified by an overabundance of shade-tolerant conifer species. Other areas have converted from forested stands to brush/shrub species. This overstocking of conifers has led to a decline in forest health and high susceptibility of loss from insects, disease, wildland fire, and climate change. Under the amended (Sierra Nevada Forest Plan Amendment (SNFPA), Record of Decision (ROD), USDA-FS 2004) Sierra National Forest Land and Resource Management Plan (SNF LRMP), an ecosystem approach to project development and planning is recommended. Where there are significant departures from the desired condition or potential for a loss in key ecosystem functions, opportunities for management actions to address this departure are developed. Of particular concern is the Willow Creek watershed with its highly departed ecological condition and its importance in providing valuable ecosystem services and community benefits to meet the ecological, social, and economic needs of the public.

To address this issue, the Greys Mountain Project proposes several restoration objectives aimed at promoting native biodiversity and ecosystem resilience. The Project would restore the ecological processes and forest heterogeneity through a series of prescribed fire and thinning treatments aimed at reducing ladder fuels and dead and down fuel loads. Another objective is to create a network of landscape area treatments and defensible fuels profiles near key transportation corridors to reduce the intensity and rate of spread of wildfires across the landscape and near communities. A third objective is to improve stand resistance to drought, insects, and disease by reducing inter-tree competition and improving tree vigor.

Desired conditions described in the Forest Plan were compared with the existing conditions in the project area. The comparison indicated a need for change. These needs (purpose and need), described below, provided the basis for the proposed action:

- Protect human communities from moderate/high intensity wild fires as well as minimize the spread of wildfires that might originate in urban areas into the forested lands created by unnaturally high levels of fuel ladders and dead and downed fuels.
- Improve resiliency in stands that are currently overstocked and are becoming more susceptible to attack from insects, diseases, drought conditions, and/or wildfire.
- Restore hydrologic function in five meadows that have vertically and laterally unstable stream systems and changed soil moisture conditions has resulted in conifer encroachment beyond the range of natural variability.
- Improve the quality and quantity of culturally significant vegetation which has deteriorated due to the absence and suppression of fire.
- Reduce the potential for undesirable damage from high intensity fire behavior to historical sites which are over grown with dense conifers and high fuels loads.
- Reduce resource damage caused by user-created vehicle routes in undeveloped recreation sites causing offsite movement of soil into streams and riparian areas that is reducing water quality for downstream users.
- Improve forest health conditions in developed recreation sites which are in a distressed state with mortality occurring and threatening public safety.

- Improve the integrity and characteristics that make cultural resources eligible for the NRHP by reducing fuels within cultural resource sites through hand thinning and piling with follow up burning, prescribed under burning, and mechanical treatments in an effort to reduce damage to the sites from the threat of intense forest fires, to decrease the potential for slope failure along railroad grades and stream channels, and to restore setting where setting is a key aspect of a site's integrity.

The Sierra Forest Supervisor selected Alternative 2 which was the Proposed Action in the Final Environmental Impact Statement (FEIS). Alternative 2 includes the following activities:

- Commercial thinning on about 1535 acres
- Mechanical Fuels and Vegetation Treatments on about 882 acres
- Handwork Fuels and Vegetation Treatments on about 124 acres
- Mechanical Fuels and Vegetation Treatments on about 318 acres
- Fuel Break Construction and Reconstruction on about 325 acres
- Reforestation on about 50 acres
- Meadow Restoration (Conifer Removal) on about 13 acres
- Meadow Restoration (Watershed Improvement Need Site Work) on about 36 acres
- Developed Recreation Sites (Hazard Tree and Thinning) on about 31 acres
- Cultural/Historical Site Restoration on about 100 acres
- Noxious Weed Management on about 10 acres
- Wildlife Habitat Restoration on about 3607 acres

APPEAL REVIEWING OFFICER'S FINDINGS and RECOMMENDATION

Documentation demonstrated compliance with applicable laws, regulations, and policies in light of the 11 appeal issues raised by appellants involving: 1) California spotted owl viability and protection measures, 2) Pacific fisher viability and protection measures, 3) Adaptive management, 4) the Sierra National Forest Plan Amendment, 5) the Sierra Nevada Forest Management Indicator Species Amendment, and 6) National Environmental Policy Act requirements.

The ARO, Earl W. Ford, found that the project is an appropriate and reasonable response to direction in the Sierra National Forest Land and Resource Management Plan and is in compliance with the plan.

The purpose and need for the project were clear. The Forest Supervisor's decision logic and rationale were clear and well documented. The Forest Supervisor was responsive to public concerns.

ARO Earl W. Ford recommended affirming the Forest Supervisor's decision on all issues and denial of all requested relief.

DECISION

I agree with the ARO's analysis as presented in the recommendation letter. The issues are similar to the comments made by Ms. Britting during the comment period. All appeal issues raised have been considered. I affirm the Forest Supervisor's decision to implement Alternative 2. I deny all requested relief.

As recommended in the ARO's letter, I instruct the Sierra National Forest to update the map packet accompanying the Greys Mountain Ecological Restoration Project FEIS and circulate the updated maps appropriately to ensure that the maps properly reflect the treatments that will be occurring in the project area as described in the FEIS.

The project may be implemented on, but not before, the 15th business day following the date of this letter (36 CFR 215.9(b)). My decision constitutes the final administrative determination of the Department of Agriculture [36 CFR 215.18(c)].

Sincerely,

/s/ Ronald G. Ketter
RONALD G. KETTER
Deputy Regional Forester
Appeal Deciding Officer

Enclosure