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Sandy Hannick

USDA

Decision Memo
Hyde Park Wildland Urban Interface Project
U.S. Forest Service
Santa Fe National Forest
Española Ranger District
Santa Fe County, New Mexico

I. Background

The Santa Fe National Forest is working as part of the Greater Santa Fe Fireshed Coalition (GSFF) to change conditions across a landscape critical to the vitality of our communities. The GSFF includes NM State Forestry, Forest Stewards Guild, The Nature Conservancy, the City of Santa Fe, the County of Santa Fe, the Pueblo of Tesuque, the NRCS, the Pojoaque Soil and Water Conservation District, the Santa Fe Water Association, the Santa Fe Fat Tire Society, and the USGS Jemez Field Station. The primary goal of the Coalition is to

> *identify and implement high priority on-the ground projects that make the Fireshed and its communities more resilient to wildfire while maintaining and restoring resilient landscapes. This goal will be realized when fire is used as a tool for management throughout our fire adapted forests, and communities in and adjacent to these forests become fire adapted - they understand the role of fire and are prepared for its occurrence.*

Although the Coalition is looking at an area of more than 100,000 acres, it has endorsed smaller projects that will represent the type of actions the Coalition would like to see on a larger scale. The Hyde Park WUI Project is one such project, which is located in forests east of the community of Hyde Park Estates, near Hyde Memorial State Park, and adjacent to Black Canyon campground. The project has been considered under the Healthy Forest Restoration Act (HFRA) to combat insect and disease, restore natural fire regimes, improve wildlife habitat, and reduce the risk of uncharacteristic fire effects.

This project is supported by the Coalition because it represents an important step in achieving that goal.

II. Purpose and Need for Action

The purpose of this project is to reduce the risk of uncharacteristic, stand-replacing wildfire and reduce the risk for insect and disease related tree mortality within the project area. The project intends to change forest conditions so that a fire starting in the project area would remain low-intensity and so that the risk of insect and disease outbreak has been reduced. Of particular concern is the potential for a fire to reach the adjacent Santa Fe Municipal Watershed, as well as post-fire flooding impacts to downstream communities. The project is necessary to reduce the risk to communities and the environment, provide for firefighter safety, and to increase forest health and resiliency.

The project area is dominated by dense stands of ponderosa pine forests with a lesser component of mixed conifer and pinon-juniper. Tree densities often exceed 1,200 trees per acre, many with

diameters less than an inch. The majority of the trees are small diameter understory trees less than 30 years of age. Because they have grown in shade, they are stunted and often diseased. These trees provide fuel ladders that can carry fire into the canopy, facilitating crown fire. Additionally, the absence of low-intensity fire over the last 160 years has contributed to the accumulation of surface fuel loads in the project area. A combination of the dense vegetation, high fuel loads, and presence of ladder fuels results in an increased risk for uncharacteristically severe wildfire. There is a need to reduce fuel loading and to safely reintroduce fire into the project area in order to reduce the risk for uncharacteristic wildfire and to improve forest health.

The high density of stands throughout the project area also creates a substantial risk for insect outbreaks. The Stand Density Index (SDI) is a relative measure of competition among trees. A SDI greater than 50% of the maximum indicates the onset of higher competition. This makes the stand more susceptible to insect infestations, tree mortality and drought stress. For the ponderosa/mixed conifer stands in the project area, the Stand Density Index ranges from 38 – 59% of the maximum, indicating a moderate to high degree of stress and susceptibility to insect and disease attack due to inter-tree competition. The risk of tree mortality from insects/diseases, particularly from bark beetles, is expected to increase as competition increases and regeneration of smaller trees continues. With chronic western spruce budworm and Douglas-fir beetle related tree mortality in the Santa Fe National Forest, there is a need to increase the resiliency of mixed conifer stands in the project area by decreasing stand densities. In addition to overstocking in the ponderosa pine and pinyon stands, there is a risk of bark beetle associated tree mortality throughout the area, particularly during drought periods.

III. Decision

I have decided to implement the Hyde Park Wildland Urban Interface Thinning and Prescribed Fire Project. This project includes approximately 1,840 acres of potential treatment. Within this area, the proposed project would thin (with hand-held equipment such as chainsaws) and prescribe burn approximately 1,000 acres. Thinning would occur on up to 826 acres and piling would be accomplished with hand crews on steeper slopes (greater than 40 percent) and along ridge lines where the volume of piled material can be stacked by hand. Some mechanical piling using a tracked excavator would be necessary along accessible ridgelines where slopes are less than 40 percent and the volume of fuels would make hand piling impractical. The proposed project would start as early as the Fall of 2018 and take one to three years to complete.

The proposed treatments would favor retention of the largest, healthiest fire-tolerant species (ponderosa pine and Douglas-fir). Since the treatment objectives can be met by thinning the smaller trees, the project proposes leaving most trees larger than 16 inches in diameter at breast height unless a tree must be felled to provide for safety or a particular site-specific need. For example, large trees that are in poor health due to insects or disease may be removed, such as those infected with dwarf mistletoe.

The proposed treatments would create openings to enhance the structural diversity of the area, improve habitat diversity, and encourage aspen growth in areas where aspen is already growing or where evidence indicates aspen growth has been suppressed by conifer encroachment. The openings would be no larger than five acres per opening.

Slopes greater than 40 percent would be thinned using low to moderate severity prescribed fires, with an objective to move forested conditions towards a more sustainable species composition

and structure. Prescribed burning would occur in fall-like conditions, usually during a dry period that follows a wet period, in order to provide the best burning results. Prescribed burning would include broadcast and pile burning to reduce surface fuels. Subsequent maintenance burns would be implemented within 10-15 years in order to maintain or improve conditions established with initial treatments.

Although the treatment area is described as 1,840 acres, not every acre of ground would be thinned or burned, thus leaving a mix of tree densities. No new roads would be constructed to implement this project. No existing roads would require reconstruction. Existing Forest Roads within and adjacent to the project area would be used during the proposed activities.

No firewood, sawlogs, vigas, or latillas are proposed for removal because of the dominance of small diameter non-merchantable trees, and the inaccessibility of the area.

IV. Categorical Exclusion Compliance:

This project is categorically excluded from documentation in an Environmental Assessment or Environmental Impact Statement under Section 603 of the Healthy Forest Restoration Act (16 U.S.C. 6591b). Section 603 of the Healthy Forests Restoration Act establishes a categorical exclusion for qualifying insect and disease projects as designated areas of National Forest System lands. An insect and disease project that may be categorically excluded under this authority is a project that is designed to reduce the risk or extent of, or increase the resilience to, insect or disease infestation.

This category of action is applicable because the Hyde Park WUI Project is situated within a landscape designated by the Secretary of Agriculture as part of an insect and disease program in accordance with Title VI, Section 602 of the Healthy Forest Restoration Act, as amended by Section 8204 of the Farm Bill of 2014. The project meets other requirements of the category, including but not limited to the following:

- The project area is both within and adjacent to the wildland urban interface. The majority of the project area is within vegetation condition classes 2A and 2B.
- The project maximizes the retention of old-growth and large trees.
- The project included consideration of the best available scientific information to maintain or restore ecological integrity.
- The project was developed through a collaborative process that included multiple interested persons representing diverse interests and was transparent and nonexclusive.

Based on internal and external scoping, as well as review of the site-specific conditions within the project area, I find that implementing this project does not adversely affect any of the extraordinary circumstances listed in Forest Service Handbook 1909.15 (Ch 30):

- Listed/proposed threatened or endangered species or designated critical habitat, or Forest Service sensitive species: *The biological assessment/evaluation documents the finding that no adverse effects will occur as a result of this project.*
- American Indian religious/cultural sites, archaeological sites, historic properties or areas: *The heritage resource clearance report documents that no adverse effects will occur as a result of this project.*
- Floodplains, wetlands, or municipal watersheds, research natural areas, congressionally

designated areas: *No floodplains, wetlands or research natural areas have been identified in the project area. A riparian area along the boundary with State Route 475 will be avoided. No municipal watersheds exist in the project area; however the adjacent municipal watershed will benefit from the reduced fire risk.*

- Inventoried roadless areas: *Of the 1,840 acre project area, 1,711 acres are in IRA. Per the Chief's Review Process for activities in IRA's outlined in direction on May 31, 2012, the Regional Forester shall review IRA activities that involve "the cutting, sale, or removal of generally small diameter timber when [such removal is] needed . . . to maintain or restore the characteristics of ecosystem composition and structure, such as to reduce the risk of uncharacteristic wildfire effects within the range of variability that would be expected to occur under natural disturbance regimes of the current climatic period." The purpose and need of this project fits within this allowed purpose, so the Santa Fe National Forest had to seek approval from the Regional Forester for activities in the IRA areas of the project. Through the review process, it was determined that the project is consistent with the 2001 Roadless Area Rule (CFR Part 294) guidance. As a result, the Regional Forester approved the proposal for treatments in the Black Canyon and Thompson Peak inventoried roadless areas on January 3, 2018.*
- Congressionally designated areas such as wilderness, wilderness study areas, or national recreation areas: *None exist in the project area.*
- Archaeological sites, or historic properties or areas: *Review of the area by an archeological clearance found the actions will not affect these resources.*

V. Public Involvement

In making this decision, I considered input from a variety of groups, individuals, and Forest Service resource specialists both early in the development of the project, throughout project planning, and before and after the scoping comment period of 2017. This input was provided through emails, field trips, formal comments made during the scoping period, phone calls, and meetings. I asked collaborators to provide feedback on the project. Although I considered public ideas and recommendations, I did not make decisions based on consensus.

The Project first appeared in the Santa Fe National Forest Schedule of Proposed Activities (SOPA) in the summer of 2005, when scoping letters were mailed to individuals, groups, Tribes, Congressional leaders, and local, state and federal agencies. The District hosted an "Open House" in July 2005 to provide an exchange of information, ideas and concerns about the project. A second public comment period occurred in November 2005 where additional comments were received and subsequently considered.

In February 2006, a decision was made to implement the project. That decision was appealed following appeal rules in place at the time (36 CFR 215) and upon review, the decision was reversed because of lack of adequate documentation in the record regarding how the project might impact resources, such as Inventoried Roadless areas. In August of 2006 the District again scoped the project and again received comments. By 2009, the District had prepared a public review document (e.g. a draft environmental assessment), which was sent to interested publics, agencies and Tribes. This document received a number of comments, which were similar to comments received in 2006. Soon after that comment period, however, uncertainty over how to analyze impacts to Inventoried Roadless areas led to the project being set aside.

In 2017, the project was brought forward as part of the Greater Santa Fe Fireshed efforts because it aligns with the group's objectives and falls within the Fireshed boundary. Also, in 2012 the Chief of the Forest Service provided more clear direction on how to consider Inventoried Roadless Areas. Accordingly, the Hyde Park WUI Project appeared in the Santa Fe National Forest Schedule of Proposed Activities (SOPA) once again in February 2017.

As part of the dialogue and engagement in the Greater Santa Fe Fireshed Coalition, the Santa Fe National Forest has participated in Coalition meetings and has kept the group updated on the project since February 2017. In addition, the Forest organized 2 field trips and visited the project site with Coalition members in July and August 2017. The Forest also worked with the Coalition to hold public meetings on September 22, 2017 and January 23, 2018 where information about the project was shared. Also the Forest contributed to several outreach events aimed at sharing information about the Coalition and the projects. These events included setting up an informational booth at the Santa Fe Farmer's Market three times over 2017 and at the Santa Fe County Fair during August 4 – 5, 2017. The Forest also organized a phone call with Coalition members on March 6, 2018, to share information and discuss the project.

In February 2017, a scoping notice was provided for the proposal. Specifically, scoping letters were mailed to Tribal governments in the area, and a Forest Service email delivery system was used to provide notice to individuals, groups, local, state, and federal agencies.

During the scoping period, which lasted between February 14, 2017 and March 16, 2017, comments were received regarding the proposal. Also, the District received comment letters after the scoping period had ended, but because the 30-day comment period isn't prescribed by law or rule, the District considered these as well. A document that responds to these comments is included in the project record.

Comments were considered by clarifying the proposal, especially in regard to the purpose and need for the project. We have provided additional information regarding the existence of insect issues within and adjacent to the project area. Also, comments were taken into account regarding design criteria found in Appendix A of this decision.

VI. Implementation Requirements

Appendix A of this decision includes a list of design features that are part of this decision. These design features were developed with input from the Fireshed Interdisciplinary Team in addition to public comments. The team includes resource specialists from wildlife, heritage, soil/water and recreation.

VII. Findings Required by Other Laws and Regulations

National Forest Management Act -This decision is consistent with the Santa Fe National Forest Land Management Plan. The project was designed in conformance with Management Areas "G" and "D" in the Forest Plan and is consistent with the standards and guidelines for that management area and within Forest-wide standards and guidelines.

Endangered Species Act - See Reasons for Categorically Excluding the Decision (a) of this document.

National Historic Preservation Act and Archaeological Resources Protection Act – See Reasons for Categorically Excluding the Decision (f) of this document.

National Environmental Policy Act – As explained in Reasons for Categorically Excluding the Decision, this decision complies with this Act.

VIII. Administrative Review Opportunities

Decisions that are categorically excluded from documentation in an Environmental Assessment or Environmental Impact Statement are not subject to an administrative review process (pre-decisional objection process) in accordance with 36 CFR 218.

IX. Implementation Date

This project will be implemented as early as October 2018.

Contact

For additional information concerning this decision, contact: Hannah Bergemann, Española Ranger District: 505.753.7331 or hannahbergemann@fs.fed.us

Sanford Hurlocker
District Ranger
Española Ranger District
Santa Fe National Forest

March 21, 2018
Date

for Bill A.

APPENDIX A

A number of design features were developed with input from the Interdisciplinary Team (ID Team) associated with the 2017 environmental review of the Hyde Park WUI Project. This includes resource specialists from the Santa Fe National Forest. These design features will be implemented as part of this project. The design features described below do not include existing design features required through the current Forest Plan, but may include items proposed in the ongoing Forest Plan revision as well as project-specific design features.

RECREATION

1) Applicable signing would be placed at campgrounds, trailheads and along trails to warn Forest visitors of project implementation activities such as tree thinning, vegetation changes, or prescribed burning along trails.
2) If equipment must cross trails, crossing would be minimal, perpendicular to the trail, and rehabilitated after treatment of the area.
3) Use of trails as access routes for heavy equipment should be minimized to the extent possible.
4) If trails must be used as access routes, they need to be fully reclaimed with sustainable trail practices implemented such as proper cut slope, width for managed use, and drainage features including rolling grade dips, water turnouts, armoring above and below the trail at drainage crossings, water bars, and check dams. Trail reconstruction will be coordinated with the Forest Service recreation team.
5) Stumps will be cut to a maximum of 8 inches within 50 feet of National Forest System trails.
6) No leave-tree marking would be applied within 150 ft of National Forest System trails.
7) Activity-generated fuels created within 150 ft of NFS trails would be piled and burned or removed within one year of operations. Piles would be located a minimum of 100 ft from trails and trailheads.

PRESCRIBED BURNING

1) Burn when fuel conditions are conducive for slow to moderate fire spread in short needle fuel beds. This typically occurs in the early spring, late summer, or fall. Short needle fuel beds occur under mixed conifer that dominates sites on north aspects.
2) Burn when soil moisture is moderate to high (you should feel moisture in the soil just after a few inches of digging).
3) Fuel moisture percent content should be between the following ranges: 1 hr= 4-15%; 10hr= 5 – 50%; 100hr= 6-50%; 1000 hr= 7-50%; and live fuel moisture= 80-200%
4) Consider burning with relatively good night time humidity recoveries (weather conditions decrease fire activity)
5) No ignitions within 50 ft of running water depending on topography
6) Prescribed burning will use emission reductions techniques and will be coordinated with the State of New Mexico, in compliance with its smoke management plan, to minimize the effects on air quality. Monitoring would comply with NMED direction.
7) Activities will be planned to meet applicable Federal, State, and local air quality regulations, including protection of Pecos Wilderness Class I Airshed
8) Burn only during accepted weather conditions for wind + ventilation (i.e. 40,000 kt/ft).

9) Burn when weather conditions are predicted to reduce smoke impacts to population centers during and at least one day following ignitions.
10) Fireline construction will only occur where necessary. Any fireline constructed will be to minimal standard needed to complete prescribed burning.
11) All firelines will be water-barred.

WILDLIFE

1. Leave islands and openings would be distributed throughout the project area. An average of two thickets per acre of 5-20 smaller diameter trees of any native species would be maintained to provide for cover and foraging areas for flammulated owls and neotropical migratory birds.
2. If present, Gambel's oaks would be retained and protected during project thinning activities. To the extent feasible, native shrubs such as wild rose (Rosa spp.), mountain mahogany (Cercocarpus montanus), Rocky mountain maple (Acer glabrum), currants (Ribes spp.) raspberry (Rubus spp.), would be retained during project thinning activities. Prescribed fire implementation would not target these species for ignition, but would be allowed to consume them in a mosaic manner; burning some while leaving others unburned.
3. If any Forest Service Sensitive Species or Threatened or Endangered species are located within or near the project area before or during implementation, sufficient protection would be provided in accordance with specific forest, regional, and national guidance. Implementation would cease until a Forest Service Biologist has been notified, investigated, and made recommendations. Occurrences would also be documented and recorded in the appropriate databases such as GIS. For example, if a Mexican Spotted Owl is located within the project area, guidance from the Mexican Spotted Owl Recovery Plan (U.S. Fish and Wildlife Service, 2012) will be followed.

SOILS & HYDROLOGY

1. Heavy equipment (masticators and dozers) would not operate in riparian areas, other than travel on designated routes.
2. Alter prescribed fire prescriptions in and control actions in RMAs as needed to maintain ecosystem structure, function and processes.
3. Prescribed fire will not be ignited in riparian areas, but will be allowed to back into them.
4. Slash piles will be placed at least 100 feet from perennial streams and 50 feet from intermittent streams.
5. Slash piles will not be placed within 15 of ephemeral channels.
6. Slash piles within riparian areas will be no larger than 100 ft2 each; built small in order to minimize fire residence time and subsequent soil impacts.
7. Ephemeral stream channels will not be used as travel routes or staging areas.
8. Motor vehicles will only cross perennial and intermittent streams at designated crossing areas.
9. Mechanized vegetation treatment systems will be designed to minimize crossing ephemeral draws. Ephemeral draws will not be crossed where equipment will cause bank breakdown. Woody debris or rock may be placed into crossings to reduce soil disturbance and compaction. Upon completion of use, the stream course at the crossing will be rehabilitated to maintain a hydrologically stable channel.

10. Where routes cross ephemeral draws or intermittent channels, crossing will be done when channels are dry and crossing will be perpendicular to the channel where possible.
11. No equipment staging areas, fueling, repair or maintenance will occur in riparian areas, but may occur in the Black Canyon Campground.
12. Spill containment materials (e.g. absorbent pads, etc) will be required on site to ensure that spilled fuel will not leave the staging and fueling areas.
13. Ground-based equipment will operate when soil conditions are dry enough to support machinery adequately.
14. No ground-based equipment will operate on sustained slopes greater than 40% in order to reduce the potential for soil movement.
15. Minimize exposure of soils and keep erosion control current. Periodically monitor effectiveness of erosion control treatments, such as water bars.
16. Travel on access routes and trails will be prohibited during periods of wet weather when use results in rutting of road/trail surfaces.
17. Avoid ground equipment operations (including ATV and truck driving and parking) on unstable, wet, or easily compacted soils and slopes greater than 40%.
18. To prevent access routes on steep slopes from collecting runoff and contributing to erosion, best management practices such as water bars will be implemented.\
19. Maximum spacing for waterbars on temporary access routes and firelines are shown in Table 1 below. Waterbars are to be cut at an angle of 30 degrees and depth of 12 – 18''.

Table 1: Waterbar Construction Guidelines

Gradient	Spacing
< 5 %	200 ft
5-10 %	150 ft
10-20 %	100 ft
21–40 %	50 ft
> 40%	25 ft

20. Erosion control measures will occur on all access routes, fire lines, and staging areas.

HERITAGE

1. Standard Resource Protection Measures identified in "Appendix J: Standard Consultation Protocol for Large-Scale Fuels Reduction, Vegetation Treatment, and Habitat Improvement Project" in the Region 3 Programmatic Agreement between the US Forest Service, State Historic Preservation Officer, and Advisory Council on Historic Preservation (2003) will be implemented to protect sites.

INVASIVE AND NOXIOUS WEEDS:

1. All off-road equipment (grinders, Off-Highway Vehicles) will be pressure washed of mud and debris prior to entering the Project Area to avoid the introduction and transport of non-native invasive and noxious weeds.