

**File Code:** 1950

**Date:** February 7, 2018

**Subject:** Section 18 Review of Decision Memo for Slickrock Project

**To:** Al Watson, Acting Forest Supervisor

**From:** Eric G. La Price, Western Divide District Ranger *ELP*

Under the provisions of FSH 1909.15, Section 18, I have reviewed the Decision Memo for the Slickrock Project, signed by District Ranger, Del Pengilly, on March 27, 1997. The purpose of the project was to treat 290 acres of wildland urban interface land around the Slickrock community, within Sequoia National Forest, Giant Sequoia National Monument.

I determined there is a need to perform maintenance on the fuel breaks that were made under the Slickrock Project decision. The original decision determined no extraordinary circumstances existed and that the proposed action will not have a significant effect on the environment. A wildlife biologist reviewed the decision and determined there was no new information pertaining to the area to consider.

In my judgment, the activities are clearly limited in context and intensity and are necessary for the maintenance of this wildland urban interface fuel break. Maintenance of the existing fuel break will primarily involve the removal of brush and trees that have regrown in the area since the original project was performed. No new information suggesting a potential for significant effects has been identified. I have determined the existing analysis and decision is adequate and a new analysis is not necessary for this maintenance action.

The original decision was done under 36 CFR 220.6(e)(6) – Timber stand and/or wildlife improvement activities that do not include the use of herbicides or do not require more than one mile of low standard road construction. This category is appropriate for continued maintenance.

Since the original decision was signed before the Monument was proclaimed and the Management Plan was approved, I am adding the necessary evaluations to conform to the Monument Plan. These are administrative evaluations and do not alter the purpose and need of the project and therefore do not require additional environmental analysis.

**Conformance with Land Management Plan**

I have determined that this decision is in compliance with the following Land Management Plan:

Land Management Plan Conformance	
Name of Plan	<i>Giant Sequoia National Monument Management Plan</i>
Date Published	<i>2012</i>
	The resource management table on page 38 shows that hand treatments, mechanical treatments and prescribed fire may be used in the Monument.
	Incidental removal of trees that present safety hazards may deviate from vegetation management standards and guidelines (pg. 84)



Pages 80-82 of the Monument Plan presents five criteria to apply when evaluating the need for tree felling and removal within the Monument. Since this project is specific to maintaining an existing fuel break around a community, any tree removal is considered incidental and necessary to protect the community and public safety.

<b>Table 1: Tree Felling Criteria</b>		
<b>Criteria</b>	<b>Language</b>	<b>Evaluation</b>
F1 Resiliency	If maintaining one or more standing trees on a site would deplete moisture, light or nutritional resources critical to the health and survival of the plant community or forest	This criterion does not apply to this project. Page 84 of the Monument Plan states "Incidental removal of trees that present safety hazards may deviate from vegetation standards and guidelines.
F2 Regeneration	If maintaining one or more standing trees on a site would adversely affect the regeneration, longevity, or growth of giant sequoias and other desired species.	This criterion does not apply to this project. Page 84 of the Monument Plan states "Incidental removal of trees that present safety hazards may deviate from vegetation standards and guidelines.
F3 Heterogeneity	If maintaining one or more standing trees on a site would adversely affect the desired diversity or structure of a stand or forest.	This criterion does not apply to this project. Page 84 of the Monument Plan states "Incidental removal of trees that present safety hazards may deviate from vegetation standards and guidelines.
F4 Public Safety	If maintaining one or more standing trees on site would create a public safety hazard. Forest Service policy is to mitigate safety hazards from recreation sites, administrative sites and the public transportation system of roads and trails, including trees or tree limbs identified as hazardous (FSM 2330.6(a))	This criterion does not apply to this project. Page 84 of the Monument Plan states "Incidental removal of trees that present safety hazards may deviate from vegetation standards and guidelines.
F-5 Recreation and Administrative Sites	Other projects that may be proposed in the Monument that could require tree felling include recreation or administrative site development and maintenance, scenic vistas and road access and parking for these sites.	This criterion does not apply. Page 84 of the Monument Plan states "Incidental removal of trees that present safety hazards may deviate from vegetation standards and guidelines.

<b>Table 2: Tree Removal Criteria</b>		
<b>Criteria</b>	<b>Language</b>	<b>Evaluation</b>
R1 Protection of Objects of Interest	If keeping one or more trees on site would cause unacceptable fuels accumulation and fire severity effects (high tree mortality when fire is reintroduced); if removing trees would reduce the risk of a wildfire to the giant sequoia groves, sensitive wildlife habitat, and adjacent communities at risk.	This project is to maintain an existing fuel break. Page 84 of the Monument Plan states “Incidental removal of trees that present safety hazards may deviate from vegetation standards and guidelines.
R2 Resiliency	If keeping one or more trees on site would provide a vector for insect or disease infestations at levels higher than currently known endemic levels.	This project is to maintain an existing fuel break. Page 84 of the Monument Plan states “Incidental removal of trees that present safety hazards may deviate from vegetation standards and guidelines.
R3 Public Safety	If keeping one or more trees on site would create a public safety hazard or attractive nuisance.	This project is to maintain an existing fuel break. Page 84 of the Monument Plan states “Incidental removal of trees that present safety hazards may deviate from vegetation standards and guidelines.

Page 83 of the Monument Plan describes a decision tree used to determine which methods of forest restoration and maintenance should apply at different locations. The following table evaluates the four considerations shown in the decision tree for this project:

<b>Table 3: Decision Tree for Site-Specific Projects in the Monument</b>	
<b>Decision Point</b>	<b>Evaluation Related to Project</b>
1 – Use of Managed Wildfire	Managed wildfire is not feasible for maintaining the fuel break because of the uncertainty of when a wildfire may occur in this specific area.
2 – Use of Prescribed Burning	Prescribed burning is feasible and will be utilized. Both pile burning and broadcast burning may be used.
3 – Use of Mechanical Treatment without Tree Removal	Mechanical treatment is feasible, but it is not feasible to have no tree removal. Some trees may need to be removed because they are dead, dying or otherwise present a hazard, and leaving them in place would result in increasing the fuel loading.
4 – Use of Mechanical Treatments with Tree Removal	Some trees may need to be removed because they are dead, dying or otherwise present a hazard.

All applicable direction from the current Monument Plan will be followed.