

MEMORANDUM

LANL General

To: Gedi Cibas, WWMD

From: Steve Yanicak, LANL, POC, DOE OB *T.M. Av 57*

Date: July 20, 2000

Subject: DRAFT Environmental Assessment for the Wildfire Hazard Reduction and Forest Health Improvement Program at Los Alamos National Laboratory, Los Alamos, New Mexico dated 7/7/2000.

NMED File No. 1381 ER

LANL / Miscellaneous

Attached is the DOE Oversight Bureau's review of the subject document.

If you have any questions, please contact Tim Michael at 827-1536.

SY:TLM:rf-s

Attachment

cc: John Parker, Chief, DOE Oversight Bureau
 Carol Torrez, US DOI, Fish and Wildlife Service



DOE Oversight Bureau Review of
Environmental Assessment for the Wildfire Hazard Reduction and Forest Health
Improvement Program at Los Alamos National Laboratory, Los Alamos, New Mexico

NMED File NO: 1381 ER

Background:

In May 2000, The Cerro Grande Fire burned approximately 43,000 ac (17,200 ha) of land, of which approximately 7,500 ac (3,000 ha) were located within the LANL boundaries. The potential for regional and local wildfires poses a substantial risk to the current operational capabilities that ensure mission requirements are met at LANL. Consequently, there is a defined need to (1) reduce the risk of damage and injury to property, human life and health, and biological resources at LANL from high-intensity wildfires and (2) enhance forest health at LANL. This plan intends to address those concerns.

General Comment 1:

The Cerro Grande Fire has significantly reduced the available Mexican Spotted Owl (MSO) habitat on the Pajarito Plateau. The Cerro Grande fire destroyed the majority of the suitable MSO habitat west and north of LANL in Pajarito, Water, Valle, Rendija, and Guaje Canyons (Figure 5, page 9).

The suitable MSO habitat at LANL is primarily limited to the mixed conifer/aspen vegetation zone. Note the extent of mixed conifer/aspen vegetation zone is limited to stringers in the western ends of LANL canyons (Page 5, Figure 3). These remnants of MSO habitat will be critical for the survival of the MSO population at LANL (and the Pajarito Plateau) until severely damaged MSO habitat recovers. These mixed conifer/aspen stringers also provide habitat and migration corridors for other important species such as black bear.

Specific Comment 1: Page 16, Development of End-State Conditions

The end-state conditions described may be appropriate for the Ponderosa Pine habitat or pinion pine/juniper habitats found at LANL but are not appropriate for the mixed conifer/aspen habitat.

The reduction of under story (removal of "ladder" fuels), reductions of canopy cover to 40-60 percent, separation of tree crowns, reduction of tree density, and reduction of ground fuels (MSO prey habitat & cover) all severely limit the suitability of MSO habitat. These end-state conditions, if applied to currently suitable or potentially suitable MSO habitat, would effectively eliminate that habitat as suitable or prevent potential habitat from attaining suitability in the future.

Recommendation:

All mixed conifer habitat (suitable and potential MSO habitat) should not be treated and all treatments be restricted to ponderosa pine or piñon pine/juniper habitat. This would provide protection for these MSO habitats without destroying them.

Specific Comment 2: Threatened and Endangered Species Protection Measures Section; Page 21, Mexican Spotted Owl section

The actions proposed for both core and buffer areas for MSO Areas of Environmental Interest (AEIs) within 380 m of explosives testing and firing sites are excessive and if applied to mixed conifer habitat would render it no longer suitable MSO habitat. Limiting treatments to 10 percent in historically occupied habitats may be excessive treatment considering that Cerro Grande fire has severely reduced MSO habitat over the entire Pajarito Plateau.

There is no mention of limiting treatments in unoccupied MSO habitat. This indicates that all MSO habitats will be subject to treatments. Considering the limited post-fire MSO habitat distributions at LANL and on the Pajarito Plateau, this could result in severe reductions in available MSO habitat.

Recommendation: See Specific Comment number 1.

Specific Comment 3: Ecological Field Studies; page 23

After noting the need for ecological studies of the effects of forestry treatments on local fauna and flora, the EA states that these studies may be initiated based on need and funding (emphasis added). These post treatment studies should be initiated based on their need and should not subject to future funding cuts.

Recommendation:

DOE should anticipate the need for these studies and should commit to allocating adequate funding for them.

Specific Comment 4: Environmental Consequences; page 42

USFWS concurrence with DOE's determination that management measures described in the Habitat Management Plan may affect, but would not likely adversely affect listed species may need to be revisited considering the large-scale impacts of the Cerro Grande fire on MSO habitat and the potential effects of this Wildfire Hazard Reduction and Forest Health Improvement Program on available MSO habitat.