



United States
Department of
Agriculture

Forest
Service

Southwestern
Region

517 Gold Avenue, SW
Albuquerque, NM 87102-0084
FAX (505) 842-3800
V/TTY (505) 842-3292

File Code: 1570-1 (2400)

Date: September 13, 1999

Forest Guardians
c/o Bryan Bird
1411 Second Street
Santa Fe, NM 87505

Certified Mail-Return Receipt Requested
Z 506 822 055

Re: Appeal #99-03-00-0072-A215, Spring Valley Urban/Wildland Interface Fuels Reduction Project, Williams Ranger District, Kaibab National Forest

Dear Mr. Bird:

This is my review decision on the appeal you filed, regarding the Decision Notice and Finding of No Significant Impact which provide for 678 acres of precommercial thinning, 3,455 acres of commercial thinning, 310 acres of sanitation, 292 acres of forage opening creation, 130 acres of grassland/savannah restoration, 101 acres of aspen release, and 7,737 acres of prescribed fire and slash treatments. Other activities include road closings/obliterations, cross country ski trail enhancements, and fuelwood opportunities.

BACKGROUND

On June 3, 1999, Forest Supervisor Conny Frisch issued a Decision on the Spring Valley Urban/Wildland Interface Fuels Reduction Project. The Forest Supervisor is identified as the Responsible Official whose decision is subject to administrative review under 36 CFR 215 appeal regulations.

Pursuant to 36 CFR 215.16, an attempt was made to seek informal resolution of your appeal. The record reflects that informal resolution of the appeal was not reached.

My review of this appeal has been conducted in accordance with 36 CFR 215.7. I have thoroughly reviewed the appeal record and the recommendation of the Appeal Reviewing Officer. My review decision incorporates the appeal record. My review and findings are enclosed.

APPEAL REVIEWING OFFICER'S RECOMMENDATION

The Appeal Reviewing Officer recommended that the Responsible Official's decision on the Spring Valley Urban/Wildland Interface Fuels Reduction Project be affirmed. The evaluation concluded: (a) decision rationale and logic were generally and clearly disclosed; (b) the proposal and decision were consistent with agency policy, direction and supporting information; (c) the analysis of anticipated results was adequate; (d) public participation and response to comments



were adequate; and (e) all of the major issues raised by the appellant were adequately addressed in the project record.

APPEAL DECISION

After a detailed review of the records and the Appeal Reviewing Officer's recommendations, I affirm the Responsible Official's decision on the Spring Valley Urban/Wildland Interface Fuels Reduction Project .

My decision constitutes the final administrative determination of the Department of Agriculture [36 CFR 215.18(c)].

Sincerely,

/s/ James T. Gladen
JAMES T. GLADEN
Appeal Deciding Officer
Deputy Regional Forester, Resources

Enclosure

cc:
Forest Supervisor, Kaibab NF
District Ranger, Williams RD (Susan Skalski)
Forestry Staff, R3
Appeals and Litigation Staff, R3

REVIEW AND FINDINGS
of the
Forest Guardians' Appeal #99-03-00-0072-A215
regarding the
Spring Valley Urban/Wildland Interface Decision

ISSUE 1: Agency Ignores Substantive Comments Submitted on the Draft EA.

Contention: The Forest Service fails to support its response to the appellant's comments and "ignores its obligations to attach these substantive comments to the final environmental statement as required by 40 CFR 1503.4 (b)." The appellant also states that the response to his issue raised concerning the "no action" alternative was ignored, in particular those concerns relating to the economic benefits of this alternative.

Response: Review of the response to comment section of the Spring Valley Environmental Assessment (EA) indicates that supporting references to the pertinent sections of the EA (relevant to the appellant's comments) were cited (AR 47).

40 CFR 1503.4(b) states in its entirety:

"(b) All substantive comments received on the draft statement (or summaries thereof where the response has been exceptionally voluminous), should be attached to the final statement whether or not the comment is thought to merit individual discussion by the agency in the text of the statement."

In this case the Forest chose to summarize the relevant points raised by the persons who commented on the draft EA.

Finding: A review of the comments received from the public reveals that the concerns and issues raised have been considered and responded to and the comments that were received have been documented and made available to the public.

ISSUE 2: New Information Must be Reviewed and Documented by the Agency. Significant Information Supporting the Effectiveness of Proposed Activities Has Not Been Provided.

Contention: "If new information or changed circumstances relating to the environmental impacts of a proposed action come to the attention of the responsible official after a decision has been made and prior to completion of the approved program or project, the responsible official must review the information carefully to determine its importance".

Appellant also contends that recent research findings (Jack Cohen) "eliminate arguments for increased logging, road-building, or grazing as alleged means of protecting homes from wildfires." The appellant states that "current strategies for wildland fuel reduction, such as the

extensive commercial timber extraction planned in the Spring Valley timber sale, will be inefficient and ineffective for reducing home losses...". The appellant indicates that the EA needs to be updated to reflect that the primary responsibility for "home wildfire protection lies with private homeowners" and that the EA should also readdress the issue of wildfire on public land and the "expectations and fear". The appellant contends that the project is based on "the unfounded assumption that commercial logging and thinning will reduce and not increase fire risk but also many of the most critical characteristics of fire."

Response: The mere existence of new information does not in and of itself necessitate supplementation of an environmental document. Preparation of a supplement to the EA is required (40 CFR 1502.9) in circumstances where "the agency makes substantial changes in the proposed action that are relevant to environmental concerns" or "significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts" come to light. The project record (AR 52) indicates that the above mentioned research data was reviewed and discussed by the Interdisciplinary team and while the Forest agrees that responsibility for home loss prevention lies with the homeowner, this data does not warrant supplementation of the EA, especially in light of information previously provided to the public concerning this issue.

The appellant cites a paper recently written by Jack Cohen, Rocky Mountain Research Station Fire Sciences Lab, Missoula. However, we are unable to find in Cohen's research any findings which "essentially eliminate arguments for increased logging, road-building or grazing as alleged means of protecting homes from wildfires". Cohen's research focuses on the likelihood of a structure being ignited by radiation from an approaching fire or from an ember igniting burnable surfaces such as, shake shingles.

Review of the project record indicates an extensive effort on the part of the Forest to inform and educate the public with regards to issues relating to fire risk in the area and the effects of the proposed alternatives, including the "no action" alternative (AR 1,2,14,15,17,19,22,26,29,34,38). The public has been kept well informed throughout the process. It is not the role of the Forest Service to dictate how private lands should be managed. Through public meetings and personal contacts it is clear that the Forest informed the public about the need for private individuals to initiate actions on private lands which would reduce the risk of wildfires. (AR 1,2,19,50). The appellant's inference that the public has been somehow misled through lack of or dubious information and their subsequent request to readdress the issue of wildfire on public land and the "expectations and fear" is unwarranted.

Numerous papers document the value of fuel treatments, often in conjunction with reducing stand density, for reducing fire potential. One of the primary goals of the Spring Valley Urban/Wildland Interface Fuels Reduction project is the prevention of crown fires (AR 46). The intensity of crown fires prevents direct fire suppression and the resulting long range spot fires lead to erratic fire behavior and the rapid acceleration in a fire's growth. There exists a strong body of evidence supporting the notion that crown fire potential is reduced by reducing canopy density and raising crown base height (c.f., <ftp://fire.org/pub/NEXUS>). The general consensus in the fire science community is that lower stand densities and reduced fuel volumes are necessary to maintenance of "fire safe" forests. As Agee points out (1996, pgs. 52-68 in: Proceedings 17th Forest Vegetation Management Conference, Redding, CA), "... 'fire safe' forests are not fire proof, but will have:

- Surface fuel conditions that limit surface fireline intensity;
- Forest stands that are comprised of fire-tolerant trees, described in terms of species, sizes, and structures;
- A low probability that crown fires will either initiate or spread through the forest."

Finding: The Forest has considered relevant literature on the subject and analyzed research findings based on the context of the project. The literature indicates there is a relationship between reduced stand densities, reduced stand volumes and maintenance of "fire safe" forests.

ISSUE 3: Requires an EIS Because Project is Significant and Controversial.

Contention: Appellant contends that the project is "highly controversial, in a scientific sense, involves highly uncertain effects and involves unique or unknown risks (40 CFR 1508.27 (b) 4,5)" and therefore, is a significant action. Appellant also contends that the project is controversial because of the effects on the northern goshawk and implementation of the "highly controversial management plan for the northern goshawk...".

Response: As it relates to the determination of significance, the term "controversial" refers to a substantial dispute existing as to the size, nature or effect of the federal action. The past and present research, that has been and is being done on the benefits of thinning from below and prescribed fire, is considerable. Thinning from below, fuel bed treatment, canopy spacing treatments and periodic low intensity prescribed fire activities, are supported by most scientists and researchers who work within, study and research fire adapted ecosystems.

Logging without subsequent fuel treatment can be expected to increase the probability of fire occurrence and, under most conditions, the severity of fire. Logging, in conjunction with fuels treatment, can reduce the potential for catastrophic wildfires if the fuels treatment is of good quality. Good quality fuels treatments effectively reduce the fuels that contribute to crowning, torching, and spotting and reduce the ecological damage of subsequent wildfires. Fuels change with time and the length of time that a treatment will remain effective varies with treatment and site potential. Therefore, fuels management needs to incorporate periodic reassessment and retreatment.

The following is a discussion of scientific publications and their findings, related to stand density, volume, and fire behavior specifically identified by the appellants.

The reference to Huff et. al. (1995, pg. 4, line 36) is a quote from their abstract. They used repeated aerial photography to determine the degree of change in 49 watersheds varying in size from 12,500 ac. to 33,300 ac. They did not determine mapping accuracy (pg. 4). Huff et. al. assigned fuel models on the basis of whether or not areas were logged or unlogged. No information was available on fuels treatments (pg. 5). Therefore, their fire behavior analysis is based on logged versus unlogged regardless of actual fuel conditions. Their analysis was limited to low to moderate intensity surface fires (pg. 5) ignoring crown fire potential. Therefore, the extreme fire behavior potential (crown fires) in unlogged stands was left out of their analysis. This is not a valid comparison. Furthermore, the trends reported by Huff et. al. were not statistically significant (pg. 8). One of the primary issues in the Spring Valley treatment area is mitigation of the most extreme fire behavior (crown fires).

It is true that fuels treatments cannot prevent all fires. Even quality fuels treatments may not protect an area from burning under the most extreme weather conditions. However, it is generally accepted that quality fuels treatments reduce fire damage. The appellant cites an unpublished report on the Tyee fire in Washington to claim, "... that harvest treatments could exacerbate fire damage ..." (pg. 5, line 4). However, Pollet and Omi (1999, paper presented at JFSC Fire Conference "Crossing the Millennium: Integrating Spatial Technologies and Ecological Principles for a New Age in Fire Management, June 15-17, 1999, Boise, ID; in press) found that fuels treatment reduced fire damage on study areas in four wildfires including the Tyee fire. This would appear to support the appellant's claim that treatment results are variable and far from certain. However, the quality of fuels treatment is difficult to ascertain after a wildfire and the time since treatment was done, affects fire potential.

The appellant cites Weatherspoon and Skinner's (1995, pg. 5, line 14) analysis of stand damage resulting from the 1987 wildfires in northern California. While it is true that Weatherspoon and Skinner found partial cut stands suffered more damage than uncut stands ("partial cut" is the terminology used by Witherspoon and Skinner, "thinned" is the terminology used by the appellant), the appellant choose to ignore the fact that the partial cutting conducted in the California stands was predominantly an overstory removal (i.e., cutting the largest most valuable trees) followed by little or no slash treatment. The results of such treatments can be expected to result in high damage as Weatherspoon and Skinner point out (pg. 444). To quote Agee (1997, Northwest Science 71 [1] pg. 153-156) who reviewed this paper, "...the major implication of this study is less an argument against logging than an argument against the types of logging and fuel treatments that were done in the past" (pg. 155).

The appellant cites VanWagtendork (1996, pg. 5, line 21). The appellant ignores VanWagtendork's conclusion that "... a management scheme that includes a combination of fuel treatments in combination with other land management scenarios is critical for successfully reducing the size and intensity of wildfires" (pg. 1164). By "... other land management scenarios ..." VanWagtendork is referring to "removing a portion of the canopy ..." to reduce crown fire potential. As previously discussed one of the main objectives of the Spring Valley Urban/Wildland Interface Fuels Reduction Project is to reduce the potential for catastrophic crown fires (AR 46).

The appellant cites Stephens (1998, pg. 5, line 28). They correctly conclude that "restoration" treatments that include partial cutting without fuels treatment lead to more severe fires. Thinning without fuels treatment is, at best, only a partial restoration. Stand structure may be restored to some former condition, but other stand processes are not restored. The Spring Valley project does not propose to leave fuels untreated. Activity generated fuels will be pre-treated using the proposed slash disposal technique and then followed by prescribed fire .

The appellant alleges that there is uncertainty of effects to the habitat of the northern goshawk. This is based on a "white paper" published by the Arizona Department of Game and Fish in 1993. The Arizona Game and Fish Department cooperated with the Forest in developing the proposed action and participated in many meetings to develop the alternatives and implement the Goshawk Guidelines. (AR 5,6,8,9,11,16). There is no evidence in the record that the Department did not agree with the implementation of the Goshawk Guidelines, nor did they propose any alternative that would implement some other form of Northern goshawk habitat management.

Finding: The Forest has done a thorough search of literature on the subject and shown that there is no substantial dispute concerning the anticipated effects of the action on fire behavior or the Northern goshawk. Therefore, an E.I.S. is not needed.

ISSUE 4: Project Fails to Follow Forest Plan Old Growth Requirements.

Contention: "The Spring Valley EA and project record fail to establish that the Forest Service has followed procedures for allocating old growth as specified by the 1996 forest plan amendments."

Response: The 1996 Forest Plan amendment requires "Until the forest plan is revised, allocate no less than 20 percent of each forested ecosystem management area to old growth...". Document 10 in the appeal record shows that 595 acres within the "opportunity area" (OA) which is a small portion of the ecosystem management area, has been allocated to old growth. The environmental analysis (AR 46, page 33) states that there are 8,911 acres of forested public land within the OA. Thus, approximately 6.7 percent of the forested land has been allocated to old growth.

Tables 9, 10, 11, 12 and 13 in the environmental analysis (AR 46) show that the alternative selected for implementation (alternative 2) will result in more than 20 percent of the area achieving vegetation structural stage (VSS) 6 in 20 and 40 years. The Forest described VSS 6 as areas with at least 20 trees per acre, 18 inches dbh and larger. This is consistent with the definition of old growth on page 96 of the Record of Decision for Amendment of Forest Plans. The discussion associated with these tables also points out that alternative 2 maintains all yellow pines which are the most likely candidates for future snags and maintains 5 to 7 tons per acre of down woody material which are additional requirements for old growth.

Finding: Implementation of alternative 2 will result in development of old growth conditions on more than 20 percent of the forested area within the analysis area for the proposed project. The Forest is in compliance with the forest plan amendments.

ISSUE 5: The Spring Valley Project will jeopardize the viability of species that find optimal habitat in interior forests, natural disturbed areas and old growth.

Contention(a): "The Spring Valley project includes cutting of large live trees, mechanical manipulation of aspen forest, road upgrades, and prescribed burning. These activities are likely to jeopardize the viability of species that find optimal habitat in interior forests, forests with well-developed structures, and forests naturally disturbed by insect and plant pathogens."

Response: The Spring Valley Opportunity Area encompasses nearly 9,500 acres of National Forest System land, of which just over 8,900 acres are forested and 556 are grasslands or savannas (AR 31,46). Ponderosa pine is the dominant forest type covering nearly 94 percent of the forested area. Mixed conifer, aspen, and pine/oak make up the remaining forested habitat with 3.8, 2.3, and .003 percent, respectively. Currently only 6.8 percent of the forested habitat is considered mature or old growth forest. Over 64 percent is considered young forest, which lacks a well developed structure.

If no treatments are applied through adoption of the no action alternative, it is expected that 14.1 percent of the forested habitats would be classed as mature or old growth in 20 years and 26

percent would be classed mature or old growth in 40 years. Structural diversity within the stands would decrease resulting in lowered cone crops thus reducing the availability of cones and seeds available to squirrels, rodents, and other wildlife.

Implementation of the proposed action would result in a 47 percent increase in the amount of forested habitats classed as mature and old growth in 20 years (20.7 percent) and a 166 percent increase in 40 years (69.2 percent) over the no action alternative. Structural diversity will be increased within the stands, resulting in better cone crops and larger limb development in the lower crowns.

The resulting increase in mature and old growth classes of forest will provide better habitat for those species that find optimal habitat in interior forests, forests with well-developed structures, and forests naturally disturbed by insect and plant pathogens

Only about 2 percent of the trees greater than 16 inches diameter or about 1.5 per acre, will be harvested with the proposed action (AR 46). Treatments are to reduce fire hazard potential in the intensive urban/wildland interface zone, restore meadow/savannah conditions, release aspen, and reduce mistletoe infestations. None of the larger trees being cut will be yellow pine regardless of the presence of dwarf mistletoe infection or tree diameter (AR 49).

The District identified the 101 acres of aspen to be released and protected by the proposed action is about one eighth of the aspen on the Williams Ranger District (AR 46). The exclusion of fire over the past ninety years has allowed for the invasion of conifers into this valuable habitat type, resulting in a decline in the quality and quantity of aspen. Without release, ninety percent of the aspen stands will be lost due to conifer encroachment.

Although it is true that one half mile of road will be reconstructed with the proposed action to meet safety and environmental factors, 30.5 miles will be closed at the entrance or obliterated. The near fifty percent reduction in road density will greatly reduce the disturbance to wildlife caused by vehicle access (AR 46).

Conclusion: Implementation of the proposed alternative will result in the amount of forested habitats, classed as mature and old growth, to increase from the current 6.8% to 20.7% in 20 years and 69.2% in 40 years. It will also result in the release of 101 acres of aspen and a reduction in road density of almost 50%. These actions are expected to greatly enhance the viability of species that find optimal habitat in interior forests, naturally disturbed areas and old growth.

Contention(b): "For most of the imperiled species affected by the Spring Valley project, the Forest Service has no up-to-date population data describing population numbers, locations, trends, nor monitoring data on which the agency can rely to determine that the actions proposed in the context of [the] Spring Valley project will maintain numbers and distribution of these species sufficient for insuring long term viability."

Response: *Northern Goshawk.*

The three Northern goshawk home ranges in the Spring Valley project area (AR 45) essentially cover the entire project area when nesting (three 30 plus acre stands suitable for nesting and three replacement stands), post fledging-family area (PFA, 420 acres), and foraging habitat are considered (5,400 acres) (Reynolds, 1991). Thus, the Spring Valley area is a "reserve". It is

very likely other home ranges in areas adjacent to Spring Valley greatly increase the size of this "reserve".

The paucity of mature and old growth classes of stands in the opportunity area limits nesting and PFA habitat to a few stands, far less than the 1,530 acres of these habitats identified in the guidelines. In addition, the high percentage of area in dense young and middle-aged forest and the resulting lower diversity, reduced cone and seed crops and lack of grass and forb forage which prey species rely upon, equates to less than optimal goshawk habitat. This low quality foraging habitat may explain the lack of reproduction in these home ranges since 1992 (AR 31,45).

Conclusion: The current stand condition, which are far below recommended levels, limits nesting and post fledging family areas for the Northern goshawk. It also limits cone, seed crops, grass and forb forage, necessary for prey species on which the goshawk depends. Contrary to the appellant's allegations, the activities in the proposed action will steadily improve the quality and quantity of nesting, PFA, foraging habitat and the prey base for the goshawk, as time passes.

Mexican Spotted Owl.

Ponderosa pine is not suitable habitat for the Mexican spotted owl, and none of the mixed conifer or pine/oak habitat in the opportunity area is modified by the proposed activity (Block, 1995). Thus, there is no effect on the Mexican spotted owl (AR 31,45,46).

The appellant contends that the current strategy of establishment of Protected Activity Centers (PACS) "violates reserve design criteria", which provides for "large habitat blocks capable of supporting multiple pairs."

Had the Mexican Spotted Owl Recovery Team and subsequently the Forest Service adopted a "reserve" strategy rather than the individual territory strategy to provide for owls and owl habitat, the Sitgreaves owl pair would not have had their habitat protected. Several other territories that are not in close proximity (several miles) to other owls or owl habitat, owing to the disjunct nature of habitats in the Southwest, would not have been garnered protection as well. Where suitable habitats are located within close proximity to one another, defacto "reserves" become established as protected activity centers upon the discovery of owls. Throughout Arizona and New Mexico there are numerous "reserves" providing for more than ten owl territories each, with the largest providing for more than eighty territories. Even more of these "reserves" provide for two to ten territories.

Conclusion: The proposed action will focus on improving conditions in ponderosa stands, which is not considered suitable habitat for the MSO. The mixed conifer and pine/oak habitat within the opportunity area (which is considered suitable habitat for the MSO) will not be modified by the proposed action.

Flammulated Owl.

With just under seven percent of the Spring Valley area in mature and old growth class stands and nearly two-thirds of the area in young stands, there is little quality habitat for Flammulated owls. Most of the activities proposed for the Spring Valley area will increase the quantity and quality of Flammulated owl habitat over time by retaining all yellow pine and large snags, increasing the amount of mature and old growth class forests over the next forty years, and by retaining many of the thickets used by the owl, i.e. forty percent of the area will still be providing

hiding cover (AR 46,49). Only in the intensive urban/wildland interface zone will pre-commercial thinning be extensive enough to greatly reduce the quantity and quality of thicket habitat for the owl. Since this zone is adjacent to human residences it would likely be used to a lesser extent by the owl than areas farther from residential areas, provided habitat quality were equal. Lowering the quality of the habitat adjacent to these populated areas will have the added benefit of keeping most owls at a greater distance from the domestic pets and residents who might prey on or harass them (intentionally or unintentionally).

Abert's squirrel.

The prescriptions for the Spring Valley area call for thinning from below to provide for an interspersion of low, medium, and high levels of canopy closure within a stand (AR 46,49). This will retain the interlocking canopy on a portion of each stand while improving the diversity within the stand, both factors of importance for squirrel populations (Reynolds, 1991). Retaining all yellow pine and large snags and releasing larger "blackjack" pine to improve growth and canopy development will increase bud and cone production, both important forage components of the squirrel diet (Reynolds, 1991). Without these treatments, these young and middle-aged stands will continue losing their structural diversity and crowns will reduce in size (AR 31,46), slowly lowering the quality of these areas for squirrels.

IN SUMMARY

Habitat conditions for sensitive species and the appellant's species of concern will generally be maintained or improved by the silvicultural treatments and road management proposed for the project area (AR 31,45,49). Some short term reductions in quality may exist for several sensitive species as a result of prescribed fire, but these should return to existing or better condition in a short period of time and would not affect overall species viability (AR 31,45). Abert's squirrel, not a TES species, may have a slight decrease in habitat quality resulting from the project, but species viability would not be affected by this localized reduction and future habitat quality will be improved for this game species.

Finding: Implementation of the Spring Valley project will maintain or improve the condition and/or amount of habitat for sensitive species found within the project area. Thus, there will be no reduction in the viability of these species. The Forest has found the proposed action will have no effect on listed or proposed species within the project area and therefore, will not jeopardize the viability of the species.

ISSUE 6: Socio-economic benefits and costs.

Contention: "The Forest Service has ignored the vast socio-economic values of unlogged forests in the Spring Valley Opportunity Area." Appellant further contends that logging reduces or eliminates these values and that this cost has been ignored. Appellant also contends the EA has not evaluated costs associated with death, injury, and property damage from logging or the displacement of private land timber production and wood fiber substitutes.

Response: Forest Service Manual (FSM) 1970 and Forest Service Handbook (FSH) 1909.17 contain detailed guidelines for conducting economic and social analysis. FSM 1970.3(6) states, "Select cost effective methods of conducting economic and social impact analyses to ensure that the degree of analysis is commensurate with the scope and complexity of the proposed action." Obviously not every project requires the same level of analysis. FSM 1970.6 goes on to state,

"The responsible line officer determines the scope, appropriate level, and complexity of economic and social analysis needed."

Economic effects of the project were not identified as issues during scoping, nor were they part of the purpose and need for action. Therefore, economic effects were not needed as a basis for alternative development or comparison. Economic effects of the proposed action and alternatives are discussed in narrative form on pages 68-71. The level of economic analysis is commensurate with the scope of the proposed action.

FSH 2409.18 section 22 states that a financial analysis should be made to determine financial efficiency of timber sales. The record indicates that a financial efficiency analysis was conducted (AR 31f) which displays estimated costs and returns of the alternatives. A summary of this analysis is displayed on page 69 of the EA. The financial efficiency analysis meets the handbook requirement.

Finding: The economic analysis is consistent with regulation and manual and handbook direction.

ISSUE 7: Expertise

Contention: Appellant alleges that the Forest Service has failed to provide the expertise needed to adequately address economic issues.

Response: Forest Service Handbook 1909.15 Sec. 12.1 directs that the disciplines and skills of the interdisciplinary team must be appropriate to the scope of the action and the issues identified. The teams are to consist of whatever combination of Forest Service staff and other Federal government personnel is necessary to provide the necessary analytical skills. As discussed above, the line officer determined the scope, appropriate level, and complexity of economic and social analysis needed. The level of economic analysis conducted did not require a journey level economist.

Finding: The interdisciplinary team contained the appropriate skills necessary to conduct the needed economic analysis.