



File Code: 1950

Date: October 22, 2001

**DECISION MEMO  
HAZARD TREE REMOVAL  
BUFFALO BILL SCOUT CAMP**

**USDA FOREST SERVICE  
Shoshone National Forest  
North Zone/Wapiti Ranger District  
Park County, Wyoming  
T52N, R108W, Portions of Section 22, 27**

**Project Identification:**

Hazard Tree Removal/Maintenance of Recreation Sites

**Decision**

I have reviewed the environmental analysis and decided to remove designated hazard trees from the Buffalo Bill Scout Camp and associated high public use areas. The proposed action falls under Category 5, in Section 31.1b of the Forest Service Handbook 1909.15 – Environmental Policy and Procedures Handbook – Repair and Maintenance of Recreation Sites and Facilities.

The decision rationale for implementation of this project is based on the fact that a risk to life and property exists from large hazard trees falling on someone or facilities at the site.

The decision and action implemented need to be the most expeditious, cost efficient method available to address concerns about safety.

The project could be accomplished by several methods, including: 1) requiring the lodge owner to remove hazard trees from the lodge permit area and “purchase” the trees from the Forest Service, 2) the Forest Service could contract a qualified service to conduct the hazard tree removal, 3) the Forest Service could sale the hazard trees through a small timber sale contract, and 4) the Forest Service could rely on force account labor to remove the hazard trees.



## Background and Proposed Action

The Proposed Action is the removal of designated hazard trees from the site utilizing the most expeditious mechanical methods for tree removal.

The Buffalo Bill Scout Camp is located in a stand of primarily Douglas-fir trees that are dead and dying due to an infestation of beetles. The Shoshone National Forest proposed a hazard tree removal/fuels reduction project for the site and conducted a public scoping in the summer of 2001. The project involves removing the hazardous dead and dying trees, separating the tree crowns and removing the ladder fuels to minimize the risk of wildfire and provide for safety concerns. The treatment would occur within a designated project area, where the trees pose a serious safety threat to individuals and facilities. The project is located in Park County and the legal description is: T52N, R108W, portions of Section 22 and 27.

Several alternatives to remove hazard trees and reduce fire risk from fuel accumulation were considered, including: 1) no action, 2) timber harvest, 3) prescribed fire, and 4) other fuel reduction methods or a combination of treatment methods.

The **Purpose and Need** for the action is:

- Reduce safety concerns by removing hazard trees around high use recreation sites and permitted lodges.
- Improve stand health by removing hazard trees that are dead, infested or at a high risk of infestation from insects and disease.
- Maintain visually pleasing on-site conditions.
- Reduce fuel loading and fire risk.
- Demonstrate management techniques that reduce hazard trees and fire risk in areas such as lodges, homes and recreation sites.

The potential for trees to fall, causing damage to facilities, power lines, vehicles or seriously or fatally injuring someone is high. The need to implement the project has intensified since the public scoping was completed in September 2001. A tree falling across the powerline could easily start a fire under the current drought conditions, as well as pose an electrocution threat to those on the site. The dead trees in the area are very prone to being blown over by the wind.

Project specifics include:

- The acreage to be treated is 40-60 acres, which is the minimal size to address the purpose and need at the site. Selected trees that pose a threat to falling on buildings, vehicles or are in areas of high concentrations of people will be removed within the project area. An estimated 150-200 hazard trees are subject to removal.
- Harvest methods to be employed will be selective cutting within the stand to remove identified hazard trees, which are dead, infested or a high risk of falling on facilities such as buildings and power lines.
- By removing hazard trees, the fire risk to buildings will be reduced by opening the stand up to minimize interlocking canopies and reducing some ladder fuels.

Project design and implementation to minimize any environmental effects or enhance the site would include:

### **Coordination with Scout Camp**

- The Scout Camp is operational from mid-June to mid-August and their preference would be to have any work done either prior to or after those dates and to have their maintenance person on site during the tree removal to represent the scout council.

### **Cultural Resources**

- Any historic structures would be protected and no change to the historic nature of the area would result. Removal of hazard trees would be a preventive measure to protect structures from potential damage from hazard trees. Consultation with the SHPO would occur.

### **Forest Vegetation and Forest Health**

- Hazardous trees would be individually identified and designated for removal.
- Because of the difficulty of falling large trees in proximity to buildings, power lines, etc. a professional, skilled contractor would be required.
- Project cleanup would require that slash be piled and burned on site. A thorough cleanup of slash would be required to minimize fire danger and maintain a visually pleasing site.

### **Aquatic Resources**

- Project implementation would require the least amount of ground disturbance as possible to accomplish tree removal.

### **Wildlife**

- All standards and guidelines for the LRMP (pages III-65-66) for grizzly bear habitat would be followed. All interagency Grizzly Bear Guidelines would also be followed.
- Timing of the project (winter, or summer, early fall) would minimize conflict with wildlife, particularly spring grizzly bear activities and bird nesting.

The contractor would have to be skilled in felling large trees in close proximity to structures and also be capable of loading and removing the downed trees. An independent logger, tree trimming business, or perhaps a commercial firewood cutting business would be the most likely to have the expertise and equipment to do the job.

## Scoping and Public Involvement:

These are the preliminary issues that were identified in the scoping statement:

- Fuel accumulations and fire risk
- Human health and safety from hazard trees/damage to facilities from falling trees
- Timing of harvest to eliminate conflict with other activities
- Effects of treatment on wildlife in and around the area

Concerns identified from six letters or verbal comments received during the scoping statement can be summarized as:

- *One phone call that was in agreement with removing dead trees, clearing brush, etc. to reduce fire danger. Their primary interest was in what would be done with the trees that were cut down. The concern was that the public should have an opportunity for firewood harvesting.*
- *All requirements for heritage resources would be met. The project had a Class III cultural inventory completed and consultation/coordination was completed with the State Historic Preservation Officer.*
- *A letter from a lumber company expressing support and an interest in cutting and salvaging the trees for house logs and firewood.*
- *A letter agreeing with the proposal to remove designated trees, suggesting that trees that could be used for lumber be removed first and the rest should be utilized for firewood. Commenter also suggested spraying should be implemented if the beetle has started to infest healthy trees.*
- *The Scout Council was not in favor of being required to pay for the labor to remove trees and possibly paying for the value of the trees also. The Scout Camp is operational from mid-June to mid-August and their preference would be to have any work done either prior to or after those dates and to have their maintenance person on site during the tree removal to represent the Scout Council.*

This decision is being distributed to interested and potential affected parties, including those who responded to the scoping letter.

## Reasons for Categorically Excluding the Proposed Action

The proposed action falls under Category 5, in Section 31.1b of the Forest Service Handbook 1909.15 – Environmental Policy and Procedures Handbook – Repair and Maintenance of Recreation Sites and Facilities. Based on a field review, specialist’s input and past experience, the effects of implementing this action will be of limited context and intensity and will result in little or no environmental effects to either the physical or biological components of the environment.

## Forest Plan Direction/Findings Required by Other Laws

This proposal is consistent with laws, regulations, and policy, as well as standards and guidelines in the Shoshone National Forest Land and Resource Management Plan (LRMP). The management area is 2B, where the primary management direction is rural and roaded recreation opportunities. It is also an area scheduled for vegetation treatment by the Forest Plan. This decision is in accordance with other applicable federal regulations and laws.

This decision was coordinated with the Wyoming State Historic Preservation Officer (SHPO).

## Finding of No Extraordinary Circumstances

Extraordinary circumstances include, but are not limited to, the presence of steep slopes or highly erosive soils, threatened and endangered species or their critical habitat, wetlands and flood plains, wetlands, or municipal watersheds, inventoried roadless areas, Congressionally designated areas (such as wilderness, wilderness study areas, or National Recreation Areas), Research Natural Areas, or Native American religious or cultural sites, archaeological sites, or historic properties or areas. These are summarized in the attached table (*see Table 1*).

### **This action does involve some of these circumstances as discussed below:**

**Threatened and Endangered Species:** I have concluded that the project would have no effect on any endangered or threatened species known or suspected to occur in the project influence zone. Similarly, it is my conclusion that implementing this action is not likely to jeopardize the continued existence of the lynx, grizzly bear, bald eagle or gray wolf.

**Wetlands and Floodplains:** I have concluded that the project would have no effect on any wetland or floodplain.

## Implementation and Contacts

This decision can be implemented immediately and is not subject to appeal pursuant to 36 CFR 215.8 (a) (4). In order to ensure safety for employees and the public and protect infrastructure/facilities, this project would be implemented as soon as possible during the summer of 2001.

For further information on this decision, contact Marty Sharp, NEPA Coordinator, 203 A Yellowstone Ave., Cody, Wyoming 82414 or telephone 307-527-6921.

/s/ Brent Larson

10/21/01

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**Brent L. Larson**  
**District Ranger**

**Date**

**Table 1. Finding of No Extraordinary Circumstances**

<b>EXTRAORDINARY CIRCUMSTANCES CRITERIA (FSH 1909.15, 30.2)</b>	<b>APPLICABILITY TO PROJECT</b>	<b>COMMENTS</b>
Air Quality; <i>Clean Air Act 1970, as amended</i>	Not Affected	
Caves; <i>Cave Resources Protection Act 1989</i>	Not Present	
Congressionally designated areas, such as Wilderness, Wild and Scenic Rivers, wilderness study areas, or National Recreation Areas; <i>Wilderness Act 1964; Wild and Scenic Rivers Act of 1968, as amended</i>	Not Present	
Floodplains, wetlands, riparian zones, municipal watersheds, aquatic systems and recreational fisheries; ( <i>Executive Orders 11990, 11988, and 12962</i> )	Not Affected	
Environmental Justice; ( <i>Executive Order 12898</i> )	Not Affected	Use and consumption of environmental resources by minority and low-income populations are not affected
Even-aged Vegetation Management, <i>National Forest Management Act of 1976</i>	Not Affected	Openings > than 40 acres and even-aged vegetation management are not applicable
Farmlands or Forest Land, Prime/Unique [7 USC 4201]	Not Present	
Inventoried Roadless Areas	Not Present	
Invasive, Nonnative Species	Not Present	
Native American religious or cultural sites, archaeological sites, or historic properties or areas; ( <i>Executive Order 11593 and 13007</i> ); <i>National Historic Preservation Act of 1966, as amended; American Indian Religious Freedom Act of 1978; Archeological Resource Protection Act 1980</i>	Potential historic properties present	Class III (100%) survey completed and project coordinated with SHPO. No sites found.
Research Natural Areas	Not Present	
Steep slopes or highly erosive soils	Not Present	
Threatened and endangered species or their critical habitat; <i>Endangered Species Act 1973, as amended</i>		No effect. This action is not likely to jeopardize the continued existence of the lynx, grizzly bear, bald eagle or gray wolf.
Wastes, Hazardous/Solid	Not Present	
Water Quality, Surface/Ground, <i>Clean Water Act 1977, as amended</i>	Not Affected	

