

HOLLISTER RESOURCE AREA  
ENVIRONMENTAL REVIEW SCOPING SHEET

PART (A) - TO BE COMPLETED BY LEAD STAFF

Summary of Proposed Action & Associated RMP/Activity Plan Decisions

Management Area: Clear Creek Management Area (CCMA)

Special Mgmt. Area (WSA, ACEC, etc.): San Benito Mountain Natural Area and WSA, Serpentine ACEC

Legal Land Description:

Date NEPA process initiated: 9/1/2004 Proposed deadline for decision: 12/15/2004

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PART (B) - TO BE COMPLETED BY ENVIRONMENTAL COORDINATOR

NEPA Documentation #: CA190-04-30

Public Notification Procedure: newsletter, individual, posting, other (explain):

Posting, field review

Associated NEPA Documents: Clear Creek Management Plan (1986) Hollister RMP (1984)

Assessment Level:           Administrative Determination (see Part C)  
                                  Categorical Exclusion (see Part D)  
                                  Minor EA (see Part E, over)  
                                  **Major EA (see Part E, over)**  
                                  EIS

PART (E) - EA SCOPING PROCEDURE AND ASSIGNMENTS

Individuals assigned to participate in this project are highlighted below. Each assigned team member should indicate if they need to assist in preparation of the EA or review only, and if they need to participate in a field exam. Deadline for Team Member input if you wish to assist in preparation is 10/15/2004.

ENVIRONMENTAL REVIEW ASSIGNMENTS

ASSIGNED TASKS	PREPARATION OR REVIEW ONLY	FIELD EXAM REQUIRED		INITIALS	DATE
		YES	NO		
Hill					
Byrne	Review jurisdictional elements/ROW				
Cotterill					
Delgado	Review for TSE/habitat impacts				
Diridoni	Provide input for proposed action Review for sensitive wildlife impacts				
Zaborsky	Provide input for proposed action Review for cultural impacts				
Wergeland					
White	EA lead.				
Moore	Provide input for proposed action Soil, Air, Water impacts				
Smith	Review for Recreation Impact, NEPA comp.				
Schwarz	Provide input for proposed action Review for Recreation Impact, Enforcement				
Slibsager	Provide input for proposed action Heavy equipment proposal review				
Gartland	Technical input/restoration.				
Wrobel	Provide input for proposed action Heavy equipment proposal review				

Environmental Coordinator (signature)

Date

EA, FONSI AND DR FORM  
ENVIRONMENTAL ASSESSMENT - HOLLISTER RESOURCE AREA

EA Number: CA-190-04-30

Lease/Serial/Case File No.: n/a

Proposed Action Title/Type: **RECURRING AND CORRECTIVE MAINTENANCE  
PROTOCOL AND ENVIRONMENTAL ASSESSMENT FOR ROUTE MAINTENANCE  
IN THE CLEAR CREEK MANAGEMENT AREA**

Location of Proposed Action: Clear Creek Management Area (CCMA)

Applicant (if any): n/a

Conformance With Applicable Land Use Plan:

This proposed action is subject to the following land use plan:

<u>Name of Plan</u>	<u>Date Approved</u>
Hollister RMP	August, 1984
Clear Creek Management Plan	June, 1986
ROD/CCMA Mgt. Plan Amendment	January, 1999
CCMA RMP Amendment and ROD	Pending

This plan has been reviewed to determine if the proposed action conforms with the land use plan terms and conditions as required by 43 CFR 1610.5.

## **I. Purpose and Need for Proposed Action**

Complex management issues within the CCMA, including threatened plant species, cultural resources, asbestos, mining, riparian habitat, access, and recreational use management, necessitate a road maintenance protocol specific to the CCMA. The proposed protocol is being analyzed as an EA to meet the following objectives for route maintenance in the CCMA: 1) Minimize road-related sediment transport from roadways and routes, 2) Minimize impacts to sensitive resources, 3) Utilize the most cost-effective maintenance techniques available, 4) Implement corrective maintenance solutions so that subsequent maintenance needs will be lower, 5) Perform all maintenance and route work according to established guidelines and standards including annual California State Soil Loss Assessments, and 6) Implement route maintenance to minimize dust emissions. Specifically, the proposed road maintenance protocol will identify:

- 1) Criteria and the procedures for implementing route maintenance in known sensitive areas or potentially sensitive areas in the CCMA;
- 2) Additional environmental analysis requirements depending on the sensitivity level;
- 3) Training requirements for equipment operators;
- 4) Procedures for dust suppression treatments;
- 5) Criteria for determining appropriate spoil, borrow and batch sites;
- 6) A procedure for implementing route maintenance outside sensitive areas;
- 7) Contingency measures in the case of accidental contaminant spills.

- 8) Projects requiring additional environmental analysis or individual project Environmental Assessments.

## **II. Proposed Action**

Develop a protocol for recurring and routine road maintenance throughout the CCMA that would meet the needs and objectives described in the preceding section. This EA is predicated on several assumptions, described below. In addition, certain terms used frequently in this EA are defined to provide clarity and assist in the analysis of the potential impacts associated with the proposed action.

### **Assumptions and Constraints:**

- 1) Maintenance would be implemented on a prioritized basis throughout the CCMA..
- 2) The guidelines proposed below would apply to all public and private entities conducting road maintenance on public lands in the CCMA, and BLM would incorporate these guidelines into site use plans, Memoranda of Understanding and Plans of Operations, etc., as well as in training and orientation sessions.
- 3) San Benito County retains ownership of approximately 12.85 miles of Clear Creek Road within the CCMA. Maintenance of these roads has been abandoned by San Benito County while their ownership has been maintained by the County. If ownership of County roads is not abandoned by San Benito County, BLM would conduct necessary road maintenance on them using non-federal dollars, with permission to do so already granted by the county (San Benito County, 2004).. If ownership of the roads is ever abandoned by San Benito County, then they would be incorporated and maintained as BLM roads, using all available funding sources. Under both scenarios, roads within the CCMA would be maintained according to the guidelines provided below.
- 4) *This EA does not address major re-routes.* Re-routes would involve individual environmental analyses. Minor road realignments are considered disturbance outside of the historic road disturbance. Segments of routes taken out of the travel way as part of route realignment would be evaluated for rehabilitation under separate environmental analyses (i.e. revegetation and/or re-contouring).
- 5) *This EA does not address the route designation process or seasonal closures.* Route designations are covered in the CCMA RMP Amendment and DEIS. Because seasonal road closures could necessitate identification of alternative routes (detours), provisions for seasonal closures were included in the 1999 Record of Decision.
- 6) BLM would maintain and update the CCMA route database structure to be compatible with the approved BLM maintenance database (FIMMS). Updates would be incorporated as road work and monitoring were completed, with GPS data added to HFO GIS for future use.

- 7) All road maintenance activities would incorporate the USFWS biological opinion for the San Benito evening primrose thus avoiding a "may affect" situation. Therefore, maintenance at some locations might be only partially implemented, modified, or deferred until a USFWS site specific consultation.
- 8) BLM would obtain CA DF&G permits for stream alteration as necessary.
- 9) BLM would implement visitor controls to ensure visitor and worker safety during all phases of road maintenance, including dust abatement projects and temporary/permanent signing. Public notification of projects would be accomplished via internet and a monthly bulletin posted on site.
- 10) The dust control projects would be done within the historic disturbance, and preliminary analysis would be covered under this EA. Additional analysis would be initiated per the screening procedure outlined in this document.
- 11) Training and operation standards identified in this document would help to minimize impacts to unknown sensitive resources which are likely to exist throughout the area, by reducing the amount of new surface disturbance.

The proposed action is to implement a road maintenance protocol which would meet the above needs and objectives.

#### **Definitions:**

- 1) For the purposes of this EA, "road/route maintenance" is defined as any road work which repairs or improves the road surface or drainage. It includes recurring and corrective road maintenance work within the historic road disturbance area (see Figure 1). Work will be entirely contained within this area unless a site specific project plan is developed and approved by resource staff prior to implementation. Individual route maintenance objectives (RMOs) will dictate the width of the improved travel surface, and therefore the width of area disturbed.
- 2) Historic road disturbance is defined as the area lying between, and including, the cut slope(s) and the fill slope(s) framing the road bed. See Figure 1.
- 3) Recurring maintenance is defined as maintenance of existing drainage structures which would require minimal earth moving. Maintenance activities considered recurring would include grading, smoothing, compacting, pulling in and/or daylighting berms, cleaning road drains, and dust suppression treatments after the initial testing. Corrective maintenance is defined as either construction of new drainage features (e.g. new culverts or rolling dips), or performing repairs to existing structures or features which would require more intensive earth work (replacing existing culverts, rebuilding stream fords, etc.) Preliminary dust suppression trials would be considered corrective maintenance.
- 4) Minor road realignment is defined as work which over a short distance (150 feet) would widen the area of disturbance no more than the width of the historic

disturbance. The intent of realignment would be to improve drainage and/or safety along the travel route.

### **III. ALTERNATIVES**

#### **Alternative I - CCMA Road Maintenance Protocol - Proposed Action**

BLM would maintain routes in the CCMA as funding and staffing allowed. Route maintenance would be authorized within and outside of the historic road bed disturbance as long as no known sensitive resources were adversely impacted, and projects would not adversely impact sites of high potential for sensitive resources. Known sites as well as potentially sensitive sites (including potential *Camissonia benetensis* and *Layia discoidea* habitat and potential cultural resource locations) would be screened using the procedure outlined in the following sections. Pacific Watershed Associates (1995) identified projects would be of high priority. All NEPA project analysis would tier back to this EA, under which blocks of projects would be screened concurrently.

**Alternative II - No Action.** BLM would continue to maintain routes in the CCMA as funding and staffing allowed. Route maintenance would be authorized within and outside of the historic road bed disturbance as long as no known sensitive resources were adversely impacted, per the screening process identified above. PWA-identified projects would be of high priority, as outlined above. All NEPA project analysis would be done on a case-by-case basis.

**Common to all Alternatives** The following protocol would be incorporated under all alternatives:

#### **Implementation Standards and References**

BLM manuals 9113, H-9113-2, 9114, Federal Highway Administration's (FHWA) Standard Specifications for Construction of Roads and Bridges on Federal Highway Projects Standards, US Forest Service Trails Handbook 2309.18, sections 2.32 a, b, and c, and the BLM-Contracted Pacific Watershed Associates (PWA) report (1995) would be used for standards, guidelines and recommendations. Road maintenance and improvement work would be completed by BLM, a BLM contractor, or another approved equipment operator. Resource awareness training would be completed by all operators to ensure compliance with adopted road maintenance guidelines, with relevant inventory data incorporated into the training as appropriate. BLM manuals and PWA techniques are incorporated by reference in this EA.

#### **Maintenance Priorities**

Primary access routes ("R routes") would be prioritized as they form the primary transportation network within the CCMA and this would be considered "recurring maintenance" within this analysis.

An extensive database of site specific route information was developed as part of the 2003/2004 BLM route inventories. These inventoried routes (Primarily T and OR routes) would be given secondary maintenance priority based primarily on the annually conducted State Soil Loss Assessments (SLSS). BLM is required

under the CA OHV grant program to repair or close routes with problems identified by the annual SSLS assessments.

Jurisdiction, use level, funding, and level of repair required, would be considered in annual project planning and emergency repairs. The lowest priority under this proposed protocol would be route maintenance to improve routes that were not identified as problem segments under the annual route inspection (SSLS).

Routes not in the 2003/2004 route inventory will be analyzed separately for designation, closure, and/or restoration. This proposal does not analyze restorative work such as barrens restoration or closed route/area restoration. However, repairing drainage on routes identified for closure would be of priority if such work would prevent continued excess erosion.

### **Soil Compaction and Moisture**

Road and route work would be done when soil moisture was sufficient to adequately compact heavy equipment's tread. If work had to be done under dry season conditions, water would be added in sufficient quantities to maintain adequate soil moisture. Upon mechanical disturbance of roadbeds by equipment, the soil would be recompact in six inch or less lifts.

### **Stream Crossing Requirements**

To minimize sediment deposition into streams, work would be performed during the low flow stages whenever feasible, or when the channel does not contain flowing water. If warranted, a temporary hay bale check dam could be placed directly downstream to trap sediment and to reduce turbidity. In any event, all work in perennial creeks would be performed with proper permits and in coordination with the California Department of Fish and Game. Appropriate BLM staff specialists would be involved in site specific analysis prior to project work to identify potentially affected resources.

### **Public Notification**

BLM would notify the public through fliers and other media releases, as well as providing the monthly Clear Creek Bulletin to clubs, landowners, claimants and other permittees prior to scheduled road maintenance and dust suppression treatments. Temporary route closures or detours would also result in notification. Efforts would be made to ensure the public would have alternative routes wherever possible, but there could be days when road segments within the CCMA might be closed to ensure the safety of the public. Safety information would be included in notifications.

### **Sensitive Resources Review**

Road maintenance would not take place until screening for sensitive resources (RTE plants and animals, cultural resources, mine sites, riparian corridors, stream crossing and vernal pools) was completed. Screening would involve comparing data sets of known sensitive resources against maps of the proposed road maintenance projects. Field visits to the site would occur if necessary.

Project screening would preferably take place at the end of the rainy season for projects proposed for the following fall. For projects involving areas outside of

the historic disturbance, additional review would be required. Project areas would be field-checked and the treatment would then continue as proposed, or be modified or deferred. Measures would be considered in all cases to avoid identified potential impacts to sensitive resources. Resource specialists would sign off on approved projects or approve modifications to projects prior to implementation, and copies of documentation would be placed in both the annual route maintenance project file and the Environmental Assessment binder. Resource specialists would need to approve all projects prior to their implementation regardless of the intensity of resource review(s).

## **Sensitive Resource Requirements**

### a) Biological

#### 1. Plants.

There would be no known adverse impacts to *Camissonia benetensis* populations, or to habitat with high or medium potential to support *Camissonia benetensis* for all route maintenance conducted within the historic disturbed area (existing road bed). All activities outside this zone will be analyzed by staff specialists on a case by case basis as discussed in *Sensitive Resources Review* (above) to prevent adverse impacts.

There would be no adverse impacts to known occurrences of *Layia discoidea*, *Fritillaria falcata*, *Pentachaeta exilis aeolica*, *Acanthomintha obovata*, *Phacelia phacelioides*, or *Chorizanthe biloba immemora*. In cases where no feasible alternatives exist, known occurrences of *Fritillaria viridea*, and *Calystegia collina venusta*, or potential habitat of *Layia discoidea*, *Fritillaria falcata*, or *Pentachaeta exilis aeolica*, may be adversely affected by road maintenance. Staff specialists would be consulted to assist in minimizing these impacts through project design changes or other measures.

Known occurrences of the plant species listed in Table 5 of 1995 CCMA EIS would be avoided during road maintenance where possible. Based upon field review, proposed road maintenance activities for a particular site could be modified/downgraded. For example, if culvert installation or maintenance were proposed which would impact a known occurrence or habitat currently capable of supporting *Camissonia benetensis*, then a possible downgrade could be to install a rolling dip or other measure within the existing road bed. Site specific project plans would be developed for those locations where the potential exists to impact sensitive resources, and stipulations required to minimize impacts would be documented as part of individual project plans.

#### 2. Animals.

Recent telemetry results indicate the California condor (*Gymnogyps californianus*), currently uses the CCMA as a flyover area. It is expected that there will be no adverse effects to this species from the reoccurring and corrective road maintenance proposed.

Temporary impacts may occur to the sensitive riparian obligate species, foothill yellow legged frog (*Rana boylei*), two-striped garter snake (*Thamnophis hammondi*), and western pond turtle (*Clemmys (Emys) marmorata*). Temporary impacts include disturbance from equipment working on culverts and in

crossings, vegetation removal, and increased sedimentation. In an effort to reduce vehicle induced mortality with all wildlife resources, vehicles will be checked underneath for wildlife seeking thermal protection after periods of remaining stationary. Staff specialists would be consulted to assist in minimizing these impacts through project design changes or other measures. Site specific project plans would be developed for those locations where the potential exists to impact sensitive resources, and stipulations required to minimize impacts would be documented as part of individual project plans. No water is to be removed from vernal pools occurring in the CCMA for any of the reoccurring and corrective road maintenance proposed.

**b) SBMNA/WSA**

In the SBMNA/WSA, no heavy equipment would travel outside the historic disturbance of the built Ridge Route or the County Road. The presence of the constructed road through the WSA is an anomaly, not specifically addressed in the IMP handbook. The Bureau would comply with the intent of IMP, which is to manage for non-impairment of wilderness values. Adequately maintaining the two roads through the area would enhance overall wilderness quality by minimizing road-related impacts to sensitive resources outside the road corridor (e.g., sediment transport). Disturbed areas along the roadways near the WSA would be rehabilitated using the most effective method available.

**c) Mine Areas**

Mined areas often have unique and special problems and would be handled by a site specific project plan encompassing resource, erosion, sedimentation and drainage criteria as appropriate. Operators would be made aware of hazards associated with the different types of mines during the yearly resource awareness training. Any work requiring new disturbance in these areas would be analyzed separately.

**d) Cultural Resources**

If a cultural resource discovery is encountered during any project, all work will cease in the area of the discovery until a qualified archaeologist is called to assess the resource and initiate mitigation (if necessary).

**e) Areas of Native American Cultural Significance**

At this time, there are no known documented areas within the Management Area that are known to be culturally sensitive to Native Americans, or to any other ethnic community. The prehistoric ethnographic affiliation of this area has never been adequately identified due to the lack of ethnographic and archaeological information for the region. There are no known living Native American descendants directly associated with this area, although numerous descendants of cultural groups in areas to the west (Salinan and Costanoan) and east (Northern and Southern Valley Yokuts) of the Management Area would be considered in consultation efforts.

**Hazardous Materials – Dust Suppressant**

All mixing of concentrated product would be done outside of sensitive zones, and if necessary, protective tarps would be used to avoid any spillage on the ground. In the event of a dust suppressant or other spill, the first course of action would be to contain the material on the existing roadway, if possible, using hand tools such as shovels to form protective berms around the spilled liquid. Emergency response to petroleum spills or accidents involving other chemical releases would be addressed in more detail in project plan EAs and in the contract documents.

The contractor would be responsible for the preparation and implementation of an emergency release plan which would be approved by this office. This emergency spill plan would describe procedures to deal with an accidental uncontrolled release of petroleum or other dust suppression products released in the event of a vehicle or heavy equipment accident. This plan would specify how to minimize the release of chemicals into a water course, or what to do in the event of direct contact of chemicals with humans, rare fauna or flora and other sensitive areas. Contractors would use only BLM approved staging areas for heavy equipment or trucks.

Sections A and B below detail the screening, implementation and documentation process to be followed under the protocol described in this EA.

#### **A. Maintenance within the Historic Disturbance.**

- 1) If no sensitive or potentially sensitive sites or areas were identified through the screening process then road maintenance could continue within the historic road disturbance without further environmental review.
- 2) A project plan would be completed for multiple site specific projects, including location, type of work, and work schedule. The project plan would serve as staff notification of all road maintenance activities. As these maintenance projects were reviewed, approved and implemented, or disallowed, documentation (project plan) would then be placed in the EA file, the route database, and annual route maintenance file
- 3) If sensitive resources were identified, then additional review would be required prior to project implementation. Protective measures and project modifications would be identified as appropriate. In some cases, adverse impacts could be considered acceptable, depending on the resource, the extent of the impact, and the benefits of the maintenance project. This would involve considering the magnitude of the problem(s) being generated by the route in its current state (i.e. erosion, public safety, etc.). However, if a project is deemed unacceptable even in modified form and/or under specified restrictions, the project would not be approved for implementation.
- 4) For all recurring dust suppression treatments, chemical application on adjacent vegetation or within flowing creeks would be avoided. Worst case impact scenarios are briefly addressed in the impact analysis below and would be incorporated and expanded upon in project EAs.

5) During the course of long-term road maintenance, it may become necessary to develop sites to store supplies and material (such as rock, concrete and culverts), as well as disposal areas for excess road materials. Prior to these activities taking place, BLM or a BLM contractor would develop a site use plan (including rehabilitation) for these sites, which would follow the same screening as outlined above for sensitive resources. When the project is completed, the material site would be rehabilitated according to the project plan so as to create slopes similar to the surrounding terrain. Additional rehabilitation needs would be assessed by staff specialists.

**B. Maintenance Outside Historic Road Disturbance**

Projects would follow the same procedure as under (A) above, except that an individual site-specific project plan would be required for each project. Because of the possibility of impacting potential habitat and/or cultural resources, additional field review may be required.

**IV. AFFECTED ENVIRONMENT**

A detailed description of the Clear Creek Management Area and its resources has been compiled as part of the Clear Creek Management Area Resource Management Plan Amendment and EIS (1995). Additional information may be found in the Hollister RMP of 1984 and the Clear Creek Management Plan of 1986. New information is described below.

**San Benito Mountain Natural Area (SBMNA) and Instant Study Area (ISA).**

In 1971, the San Benito Mountain Natural Area (SBMRNA) was formally designated. The area is 1880 acres in size and contains a Wilderness Study Area (WSA) of 1488 acres. The mineral issues causing the retraction were resolved in subsequent months, and the Bureau proposed extending the Natural Area back to the 1830 acres. The RNA status has been carried forward in both the Hollister Resource Management Plan of 1984 and the Clear Creek Management Plan of 1986, An additional expansion of the Natural Area to 4082 acres was proposed under the 1995 Clear Creek Amendment. This expansion is again proposed in the 2004 DEIS/Plan Amendment for CCMA (pending).

With the passage of the Federal Land Management Policy Act (FLPMA) of 1976, the SBMRNA became an "Instant" Wilderness Study Area (WSA). The WSA was recommended unsuitable for wilderness because of its small size, and because of the presence of roads and developed facilities such as radio towers. The BLM dropped the area from further wilderness consideration in February, 1980. However, since an ISA is embedded within the SBMRNA, the SBMRNA could only be dropped from consideration by the U.S. Congress, and as such is still is subject to Interim Management Policy (IMP). IMP limits activities so as to prevent impairment of wilderness values.

**V. Environmental Impacts**

Critical Element	Affected Yes No	Critical Element	Affected Yes No
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Air Quality	X		T & E Species		X
ACECs	X		Wastes, Hazardous/Solid	X	
Cultural Resources		X	Water Quality	X	
Environmental Justice		X	Wetlands/Riparian Zones	X	
Farmlands, Prime/Unique		X	Invasive/non-native species		X
Floodplains	X		Wild & Scenic Rivers		X
Native American Religious Concerns		X	Wilderness		X

## Alternative I

### Vegetation

The possibility of spillage of hardening mixture during dust suppression efforts creates the potential of adversely affecting all three vegetation components listed below.

### Special-status plant species

Undocumented occurrences and potential habitat of all special-status species (except *Camissonia benetensis*) listed previously could be identified through the pre-project screening process, with adverse impacts then avoided. Beneficial impacts to all special-status species would be expected to range from minimal to great due to reduced erosion from alluvial terraces, serpentine barrens, sparsely-vegetated hillslopes, and intermittent drainage banks that will be effected by the re-establishment of proper drainage patterns (in areas where drainage patterns have been altered by roads, trails, and mines) and the increased stabilization of road and trail surfaces.

### San Benito forest, vernal pools, and other wetland vegetation

There would be no adverse impacts which would occur to the San Benito Forest or vernal pool and other wetland vegetation. These resources should see some benefit from reductions in sediment transport resulting from the reestablishment of proper road drainage and the increased stabilization of road and trail surfaces.

### Riparian vegetation and Floodplains

There would likely be short-term damage to, or removal of, riparian vegetation at numerous drainage crossings where culverts, and other water crossing structures were installed or repaired. In many instances, riparian vegetation such as Brewer's willow (*Salix breweri*) or goldenrod (*Solidago spp.*) would be expected to recolonize such disturbed sites within 1-2 years. The riparian vegetation removed for the long term (for example in the case of concrete crossing installations) would represent minimal overall impact to the total riparian area within the CCMA. There are no special-status plant species which grow within the riparian zones, though a few known locations of

*Camissonia benetensis* and *Layia discoidea* occur on the edge of wet habitat types. These occurrences would be avoided during all road maintenance. Beneficial impacts to riparian vegetation would be expected to occur due to the reduction in bank erosion and riparian vegetation loss which has been occurring as a result of altered runoff across roads and trails.

Some work could occur within identified floodplain areas. However, the disturbance would be contained within existing road bed areas and therefore not create additional floodplain impacts.

### **Soil, Air, Water**

By constructing proper water drainage controls on roads and trails, Alternative I should greatly decrease sediment loads and erosion levels in the CCMA from that of the existing situation. Pacific Watershed Associates (PWA) estimated the past and future sediment loads from 110 miles of main OHV routes. These estimates showed that the construction of road berms, and installation of culverts and rolling dips would have a beneficial effect of reducing sediment yields. In the short term, during the initial construction phase, some surface disturbance outside of the existing roadbed could take place and material could be sidecast downslope. However, all on-site disposal of cut and fill material would be done so that it would avoid direct sediment delivery into the stream channel. Soils within the CCMA would be better protected with the overall reduction of sediment transport.

Fugitive dust emissions could occur if the surface being disturbed was not adequately moist. The use of the on-site water truck and ongoing compaction during construction should help to minimize emissions. All project work would comply with the requirements for a "remote" exemption for wet-season CCMA road work under Monterey Bay Unified Air Pollution Control District stipulations for such an exemption (See attached Initial Study).

Water quality impacts could occur during the construction of stream crossings (e.g., concrete fords or improved rolling dips armored with rock), but these would be expected to be ephemeral, with sediments settling rapidly after completion of work at the project site. During periods of higher streamflow appropriate sediment capture techniques would be used to prevent excessive turbidity and/or sedimentation downstream from the project site.

### **Human Health & Safety**

#### **A) Asbestos**

As discussed above, maintenance activities could create asbestos dust emissions which could pose a health and safety threat. However, adequately wetting soils should reduce or eliminate the generation of dust. Additionally, BLM policy for work in this area requires that all employees adhere to the Health and Safety Plan (2003). As part of this plan proper employee personal protection equipment such as respirators, coveralls, air samplers, and decontamination facilities are provided and utilized as required under the Safety Plan. All work would conform to existing and/or future revisions of the OSHA and BLM health and safety policies and regulations. Compliance with these guidelines would minimize impacts to human health.

#### **B) Other Hazardous Materials**

When diluted with water for application, dust suppression chemicals would be readily absorbed into the porous soil and sub-soil. Given the uncertain volumes (a small water truck can hold 2000 gallons) involved, if an accidental spill occurred an unknown amount would be expected to run-off and not be immediately absorbed into the soil. This run-off would need to be diverted from entering any standing or flowing water or sensitive habitats. The native soil and sub-soil could then be used to absorb any remaining free liquids. If the material was not contained, and was accidentally introduced into live water or sensitive areas, then this material could "set-up" and form a contaminated "crust". This "crust" would form a hardpan that could be very thin (1-2 inches) or thick (6-8 inches) based upon the topography and the length of time the product was allowed to stand.

Any spilled hydrocarbon products or other dust suppression agents would biodegrade in the long-term (3-5 years), and would be unlikely to contribute to any permanent habitat damage. In the past, BLM has responded to hydrocarbon spills on public land by either removal of all contaminated soil and vegetation, or in areas of sensitive habitats allowing for natural bio-remediation to occur. Given the diverse range of dust suppression products and the products used in vehicles and heavy equipment, it is not possible to describe how application procedures, or specific emergency removal or disposal options would affect human health.

### **ACEC**

The Serpentine ACEC encompasses approximately 30,000 acres within the CCMA. The ACEC was designated because of its unique geology and resulting vegetation. Impacts to these resources are detailed in the "Vegetation" and "Soil, Air and Water" sections, above.

**Wilderness Study Area**- This area would not be impacted by the proposed action except for areas of disturbance immediately adjacent to the Ridge Road and the County Road. Impacts would be rehabilitated, as necessary, using hand tools wherever possible. If the proposed maintenance was not completed, road-related erosion damage would continue in this area, potentially resulting in greater impacts to the area than those caused by appropriate route maintenance projects.

### **Recreation**

Recreationists may be inconvenienced during periods of road maintenance because they would be unable to use routes during maintenance and dust suppression activities. The net impact should be positive, however, as routes would be safer, travel corridors (at least for main routes) would be better defined, and overall access would be improved. While road work is underway, certain roads, trails, and facilities (i.e. Staging Areas), could be temporarily limited and/or closed. Access in the canyon could be limited, and four or more of the seven staging areas and campgrounds could experience overcrowding (vehicles and visitors). This overcrowding may require additional signing and directional travel control to lessen the opportunity for collisions with motorcycle users in and out of portal trails within the canyon. In addition, terraces which do not usually experience vehicle parking except on very busy weekends could be impacted by vehicle traffic and parking. The visitor safety measures outlined above should minimize this impact. As work proceeds out of the canyon area, controls such as those mentioned above should help to eliminate resource damage and safety hazards.

## **Wildlife**

Impacts to wildlife would mostly result from inadvertent collisions with construction equipment. A minimal amount of habitat would also be impacted by corrective maintenance activities, long-term storage of burden materials, short-term use of concrete batch plants, and development of rock quarry sites. Perhaps as much as 50% of the work would be carried out in the Spring when impacts would be magnified by the potential to disrupt reproductive attempts. The proposed action describes methods intended to minimize impacts. No federally listed species would likely be affected by the proposed action. Vernal pool fairy shrimp do occupy vernal pools within the CCMA. However, no construction is proposed that would add sediment to the pools or significantly divert runoff away from the wetlands.

Spills could result in contaminants entering the watershed or being absorbed into the soil. Contingencies are described as part of the proposed action which would ameliorate these adverse effects, and individual project EAs would be prepared if significant potential for adverse affects is identified in pre-project screening process.

The majority of the stream crossing structures would be constructed during low water periods. At any time, this type of construction could add sediments into the water course. These sediments might reduce hatching success and hatchling survival of aquatic life. Of particular concern is the yellow-legged frog. At high flow rates, more sediment would likely be introduced into the stream. During very low flow periods, increased sediment could become concentrated and particularly threatening. The streams could be completely dammed during the construction of low-water crossings. Depending on the time of year, a stream's rate of flow, population status and distribution of aquatic life, duration of impoundment, and spatial and temporal proximity to other construction sites, could result in adverse impacts that are difficult to mitigate. Such projects could be delayed or analyzed under individual environmental analyses.

Certain types of road work could require specific levels of soil moisture to properly perform the needed work. While it might be most practical to perform work when sufficient rainfall had occurred to provide sufficient soil moisture, there might be situations requiring the addition of water. Water could be drawn from adjacent streams. However, this type of work could increase turbidity, increase the likelihood of accidental release of petroleum products into the stream, and reduce the quantity and quality of water needed by aquatic wildlife.

Generally, wildlife should benefit from maintaining runoff and sediments within natural channels rather than current tendency for roads to divert flow, which has resulted in accelerated erosion and sedimentation.

## **Cultural Resources**

In general, the greatest impacts to cultural resources would occur when there were no visible surface indicators within the proposed project area (e.g., maintenance work would commence and an inadvertent cultural resource discovery occurs within the proposed project area). A common example of this would be an archaeological site buried under silt or covered by heavy vegetation which would hamper surface visibility

during cultural resources inventory. As described above, if inadvertent finds are encountered during any project, all work will cease in the area of the discovery until a qualified archaeologist is called to assess the resource and initiate mitigation (if necessary).

Spillage of hardening mixtures and related solutions during dust suppression efforts could potentially affect cultural resource materials located at or near the ground surface. Effects upon inorganic and organic artifactual constituents are unknown, but adverse affects are possible. Disking of the ground during suppressant application would affect approximately the top 6" of deposit by disrupting material provenance and possibly damaging delicate cultural materials.

Cultural resources will benefit from maintaining runoff and sediments within natural channel courses rather than the artificial tendency for roads to divert flow, causing accelerated erosion and increased sedimentation across potential archaeological site locations. Proper route maintenance will ideally keep all vehicles on the designated routes rather than on unapproved or closed routes, aiding in cultural resources protection and management.

## **Alternative II**

Impacts from road maintenance performed under site-specific environmental analysis would be as described under the impacts for Alternative I. However, this alternative would likely delay appropriate route maintenance because of the individual NEPA analysis required for each project. This could result in maintenance being deferred or delayed unnecessarily, allowing adverse effects from poor drainage and route maintenance to continue.

## **Description of Mitigation Measures and Residual Impacts**

No adverse residual impacts are anticipated. The proposed action, if implemented according to the stated protocol and within the specified assumptions and definitions, should not require additional mitigation beyond individual project plan stipulations.

## **Cumulative Impacts**

The proposed action would be implemented over a period of several years, and should have the net affect of reducing erosion and sediment transport in all watersheds. This should have a net positive impact on the natural resources within the CCMA. Additionally, by implementing a far-reaching and logical maintenance schedule, recreationists would over time be able to identify the designated route system more easily, possibly reducing non-compliance and violations. Providing a sustainable, safe, and properly maintained route network is BLM's goal for the CCMA, and this protocol is intended to improve and streamline route maintenance efforts.

## **Persons/Agencies Consulted:**

Monterey Bay Unified Air Pollution Control District  
California Department of Fish and Game

**Preparer(s):**

Erik Zaborsky, Archaeologist  
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Gary Diridoni, Wildlife Biologist  
Tim Moore, Hazardous Materials/Geologist  
Dave Slibsager, Implementation Lead  
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**References**

San Benito County, 2004. Letter granting BLM permission to perform maintenance on County roads

within the CCMA.

Pacific Watershed Associates. 1995. Erosion analysis for Clear Creek Management Area.

\_\_\_\_\_  
Environmental Coordinator

\_\_\_\_\_  
Date

**FINDING OF NO SIGNIFICANT IMPACT/DECISION RECORD**

I have reviewed this environmental assessment including the explanation and resolution of any potentially significant environmental impacts. I have determined that the proposed action with the mitigation measures described below will not have any significant impacts on the human environment and that an EIS is not required. I have determined that the proposed project is in conformance with the approved land use

plan. It is my decision to implement the project with the mitigation measures described and defined within this document.

Authorized Official: \_\_\_\_\_

Date: