

Determination of NEPA Adequacy (DNA)

U.S. Department of the Interior
Bureau of Land Management
Medford District, Ashland Resource Area

Cascade-Siskiyou National Monument Trailhead Improvements DOI-BLM-OR-M040-2015-004-DNA

A. Location of the Proposed Action:

The proposed authorized area encompasses approximately 8 acres located at two different locations on BLM lands within the Cascade-Siskiyou National Monument (CSNM) (Figure 1). The locations specifically are the Pilot Rock Trailhead (the old rock quarry terminus of BLM Road 40-2E-33) and the Hobart Bluff Trailhead (where the Pacific Crest National Scenic Trail (PCNST) crosses the Soda Mountain Road (BLM Road 39-3E-32.3)).

The Public Land Survey Description is:

Township 41 South, Range 2 East, Section 3 – Pilot Rock,
Township 40 South, Range 3 East, Section 16 – Hobart Bluff,
Willamette Meridian, Jackson County, Oregon.

Description of the Proposed Action:

The Ashland Resource Area of the Medford District Bureau of Land Management (BLM) plans to develop two trailheads (TH): 1) located near Hobart Bluff at the PCNST and the Soda Mountain Road and 2) at the old rock quarry location which serves as the trailhead for the Pilot Rock and Lone Pilot Trails. The two locations are immediately outside of the Soda Mountain Wilderness (SMW) boundary and maintenance and development of these trailheads was approved in the *Cascade-Siskiyou National Monument Record of Decision and Resource Management Plan* (CSNM ROD/RMP) (USDI 2008) and in the *Soda Mountain Wilderness Final Stewardship Plan* (USDI 2012). In addition to the trailhead maintenance and development, the PCNST south of Soda Mountain Road would be re-routed approximately 50 feet to the east to provide sufficient room for the TH development, and to prevent water from flowing down the current trail tread and causing erosion. During spring snow runoff, ruts are evident in the trail tread, which is located on a short, steep pitch. The re-route would lengthen the trail for a short duration, but provide for better erosion control and lessen resource damage. The total length of the re-route would be less than 100 feet. This proposed re-route would be designed in a manner that most effectively protects monument resources from future degradation. (CSNM ROD/RMP, p. 101).

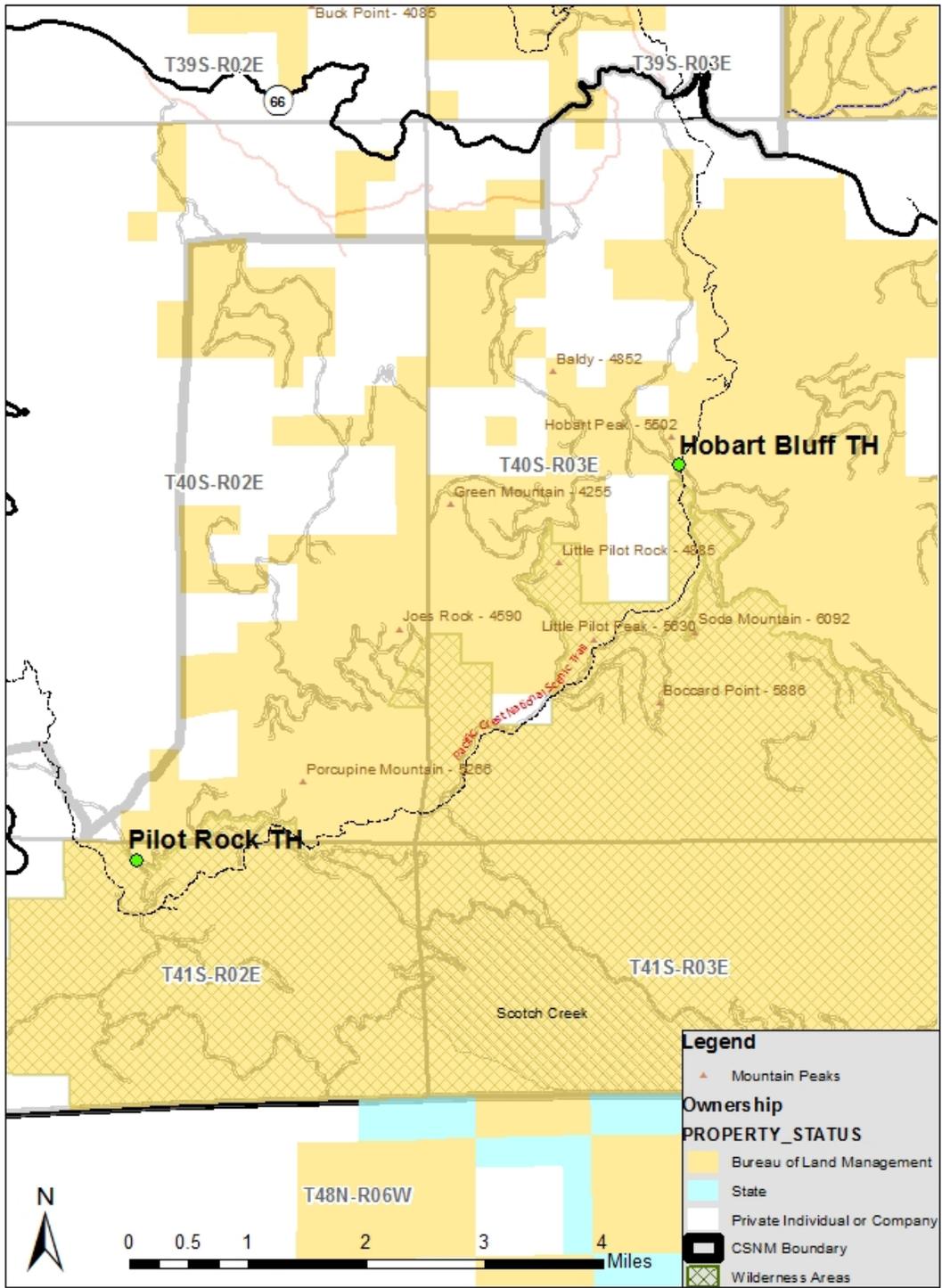
The two TH locations will be developed following the guidelines in the CSNM ROD/RMP and the SMW Final Stewardship Plan including hardening of parking surfaces, vehicle barriers, toilet facilities, and interpretive kiosks. Both TH locations are receiving considerable visitation. Visible resource damage is occurring and public health and safety concerns exist due to lack of facilities. A permanent CXT-style vault toilet is planned to be installed at each TH, in addition to parking improvements and vehicle barriers. The buildings would follow bureau regulations pertaining to visual resource management (VRM) standards for building color, contrast, and placement. In addition, all new

developments would adhere to the Architectural Barriers Act of 1968, and the Americans with Disabilities Act of 1990.

Trailheads will be developed to the minimum extent necessary to reduce resource damage with the purpose of protecting monument and wilderness values; trailheads will be maintained at the following two locations outside the SMW boundary: Pilot Rock Trail/PCNST parking facility at the rock quarry along Pilot Rock Road, PCNST parking under the power lines along Soda Mountain Road (SMW Final Stewardship Plan, p. 21). Vehicle barriers will consist of rock or boulder barriers or natural wooden/earthen barriers best matching the contrast color and texture of the local environment and both BLM and National Landscape Conservation System (NLCS) VRM standards. Any BLM signs used for directional or interpretive information will be procured through the BLM's National Sign Center per NLCS guidelines. The proposed activity would occur between July 1 and September 30, 2015.

Figure 1

Proposed Trailhead Improvements



B. Land Use Plan Conformance

Land Use Plan (LUP) Name: *Cascade-Siskiyou National Monument Record of Decision and Resource Management Plan (ROD/RMP).*

Soda Mountain Wilderness Stewardship Plan and Environmental

Date Approved: August 2008

In 2008, the Cascade-Siskiyou National Monument (CSNM) Record of Decision and Resource Management Plan (ROD/RMP) was completed. The CSNM ROD/RMP provides overall direction for management of all resources on BLM-administered lands comprising the CSNM. The proposal meets the objectives and management direction in this plan. The LUP does not change the BLM's responsibility to comply with applicable laws and regulations, including the Federal Land Policy and Management Act (FLPMA), or any other federal law.

This proposal is consistent with the *Medford District Integrated Weed Management Plan Environmental Assessment* (1998) and tiered to the *Northwest Area Noxious Weed Control Program* (EIS, 1985) and the 2001 ROD and *Standards and Guidelines for Amendments to Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines*. The proposal is also in conformance with the direction given for the management of public lands in the Medford District by the Oregon and California Lands Act of 1937 (O&C Act), Federal Land Policy and Management Act of 1976 (FLPMA), the Endangered Species Act of 1973 (ESA), the Clean Water Act of 1987 (CWA), Safe Drinking Water Act of 1974 (as amended 1986 and 1996) (SDWA), Clean Air Act of 1990, and the Archaeological Resources Protection Act of 1979 (ARPA).

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

USDI Bureau of Land Management. 2005. *Cascade-Siskiyou National Monument Proposed Resource Management Plan/Final Environmental Impact Statement*. Medford District Office, Medford, Oregon.

USDI Bureau of Land Management. 2008. *Cascade-Siskiyou National Monument ROD/RMP*. Medford District Office, Medford, Oregon.

USDI Bureau of Land Management. 2011. *Soda Mountain Wilderness Stewardship Plan and Environmental Assessment*. Medford District Office, Medford, Oregon.

USDI Bureau of Land Management. 2012. *Soda Mountain Wilderness Final Stewardship Plan*. Medford District Office, Medford, Oregon.

D. NEPA Adequacy Criteria

- 1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed? Is the current proposed action within the same analysis area of the previously analyzed project?** The 2008 CSNM ROD/RMP and the 2012 SMW Stewardship Plan analyzed developments and maintenance of these two TH locations. The proposed actions are in adherence with the guidelines set forth in the CSNM ROD/RMP and the SMW Stewardship Plan. The analysis area is exactly the same as analyzed in the plan.
- 2. Is the range of alternatives analyzed in the existing NEPA documents appropriate with respect to the current proposed action, given current environmental concerns, interests, and resource values?** The range of alternatives analyzed in the above CSNM ROD/RMP document is appropriate with respect to the current proposed action. Additionally, a range of alternatives for the trailheads was analyzed in the SMW Stewardship Plan and Environmental Assessment (2011).
- 3. Is the existing analysis valid in light of any new information or circumstances?** This project is consistent with the suite of activities analyzed in the above referenced ROD/RMP and EA. The interdisciplinary team planning and overseeing the implementation of this site-specific project reviewed the anticipated effects of this project against those documented in the above-referenced ROD/RMP and EA and found the existing analysis to be valid for this proposed action.

Getner's Fritillary

All of the project sites have been inspected by BLM botanists annually during the last five years. The project areas are within the range of *Fritillaria gentneri*. No federally-listed, bureau special status or survey and manage plants occur at the sites. There will be no effect to federally-listed, special status or survey and manage plant species.

Treatment of Invasive Species

There are no noxious weeds at or near the project areas. Implementing the project will not contribute to the spread of noxious weeds (see project design features below).

- 4. Do the methodology and analytical approach used in the existing NEPA documents continue to be appropriate for the current proposed action?** The interdisciplinary team approach was used in evaluating the proposed action. The present methodology continues to be appropriate, because the action is the same.
- 5. Are the direct, indirect, and cumulative effects of the current proposed action similar to those identified in the existing NEPA documents?** The interdisciplinary team planning and overseeing the implementation of this site-specific project reviewed the anticipated effects of this project against those documented in the above referenced ROD/RMP and EA and the effects disclosed are the same as those identified and analyzed. No new information or circumstances would affect the predicted environmental impacts as stated in the above referenced ROD/RMP and EA.
- 6. Are the public involvement and interagency review associated with existing NEPA document(s) adequately for the current proposed action?** In June 2002, the BLM released the Cascade-Siskiyou National Monument Draft Resource Management Plan/Draft Environmental Impact Statement (DRMP/DEIS). A 90-day comment period followed the publication of the DRMP/DEIS. In response to

numerous requests, the public comment period was extended for an additional 90 days. A 30-day protest period, beginning February 11, 2005, was provided for the Proposed RMP/FEIS in accordance with 43 CFR 1610.5-2.

During the scoping process, over 17,000 comments were received. Issues related to the Scoping Proposal were identified by the interdisciplinary team after reviewing the input received. Issues that could not be resolved with the Proposed Action were carried forward for analysis as significant issues.

A list of the agencies, organizations, and tribes the ROD/RMP was sent to can be found in Chapter 5 of the ROD/RMP.

The Soda Mountain Wilderness was designated in 2009. Two public scoping meetings were held on May 13, 2010. A scoping letter inviting comments was mailed to interested parties and posted on the BLM website. Issues that could not be resolved by the Proposed Action were carried forward for analysis.

E. Interdisciplinary Analysis: This worksheet was distributed to the appropriate members of the Ashland Resource Area Interdisciplinary Team for review and input.

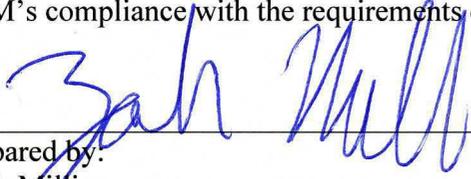
F. Mitigation Measures: Project Design Features (PDFs) are an integral part of the trailhead development and are designed to avoid or reduce the potential for adverse impacts to monument resources. The following PDFs are included in this project.

- All equipment and tools shall be washed and free of mud and debris prior to entering the project area at a site where any mud or debris from the equipment will not contribute to the spread of noxious weeds.
- Areas of disturbance leaving exposed mineral soil outside parking or other designated use zones will be seeded/ planted and/or mulched with native plant materials.
- If during project implementation the contractor encounters or becomes aware of any objects or sites of paleontological or cultural value on federal lands, such as fossils, historical or pre-historical ruins, graves, grave markers, or artifacts, the contractor shall immediately suspend all operations in the vicinity of the cultural value and notify the Authorized Officer of the findings. The project may be redesigned to protect the cultural resource values present, or evaluation and mitigation procedures would be implemented based on recommendations from the resource area archaeologist with concurrence by the Ashland Field Manager and State Historic Preservation Office.
- Trailhead development work shall occur during the dry season (generally between May 15 and October 15). Activities may be permitted when conditions are dry during the wet season (generally Oct 15 – May 15). When dry conditions are experienced within seasonal restrictions, coordination with resource area aquatic specialists for agreement on the activity shall occur. No ditch maintenance shall occur during the wet season (generally Oct 15 – May 15) unless for safety or resource protection. Work shall be suspended during precipitation events or when observations indicate that saturated soils exist to the extent that there is visible runoff or a potential for causing elevated stream turbidity and sedimentation.

- The mardon skipper butterfly and the Siskiyou short-horned grasshopper are known to occur in habitat adjacent to the Hobart Bluff Trailhead. Equipment and foot traffic should be kept off natural meadow areas in this vicinity to avoid inadvertent impacts to grassland habitat.

CONCLUSION

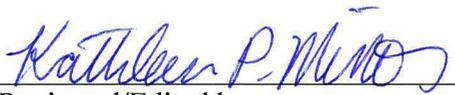
Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the existing NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.



4-13-15

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4-13-15

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