Dear Interested Party

Attached are the recently completed Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) for the Lower Table Rock Accessible Interpretive Trail, EA #OR-115-05-05. This EA evaluates the Butte Falls Resource Area, Medford District Bureau of Land Management (BLM) proposal to construct an accessible, interpretive trail loop in the Lower Table Rock portion of the Table Rock Area of Critical Environmental Concern. The project is located in the Northeast ¼ of the Southwest ¼ of Section 30 in Township 36 South, Range 2 West, Willamette Meridian, Jackson County, Oregon.

These documents are available for public review and comment for a period of 15 days. The effective date for the beginning of the comment period will be the date of publication of the notice of the EA availability and FONSI in the Medford Mail Tribune. Notice will also appear in the Grants Pass Daily Courier, however; the date of publication in the Medford Mail Tribune will prevail as the effective date for this decision. The documents are also available on our website (http://www.or.blm.gov/Medford) under planning documents/environmental assessments.

As I make my decisions regarding this project, I will consider all pertinent site-specific comments. The most useful are those that clearly articulate site-specific issues or concerns. Comments received after the 15-day period will not be considered.

If you have questions or comments concerning this project, please contact the project team leader, Robyn Wicks, at (541) 618-2458. Comments may also be mailed to Bureau of Land Management, 3040 Biddle Road, Medford, OR 97504 or e-mailed to or110mb@or.blm.gov (be sure to include “Attention: Robyn Wicks”).

Any comments received, including names and addresses of respondents, will be available for public review at the Medford District BLM Office; 3040 Biddle Road; Medford, Oregon during regular business hours (8:00 am to 4:30 pm), Monday through Friday. If you wish to withhold your name and address or both from public review or from disclosure under the Freedom of
Information Act, you must state this at the beginning of your written comment. Your request will be honored to the extent allowed by law. All submissions from organizations or businesses and from individuals identifying themselves as representatives or officials of organizations or businesses will be made available for public inspection in their entirety. We appreciate your interest and involvement in this project.

Sincerely,

Jim Keeton
Field Manager (Acting)
Butte Falls Resource Area

2 – Attachments:
1 – FONSI (2pp)
2 – EA (13pp)
# EA COVER SHEET

**Resource Area:** Butte Falls  
**EA Number:** OR115-05-05  
**Action/Title:** Construction of Lower Table Rock Accessible Interpretive Trail  
**Location:** T36S, R2W, Section 4, Willamette Meridian  
**For More Information, Contact:** Robyn Wicks  
3040 Biddle Road  
Medford, OR 97504  
541-618-2458

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A special thanks to Bob Rose, Americans with Disabilities Act Consultant with Handicap Awareness and Support League, for his expertise and contributions to this trail project.

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**Reviewing Official:**  
[Signature]  
Butte Falls Field Manager  
5/21/05
Lower Table Rock
Accessible Interpretive Trail
Environmental Assessment
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Lower Table Rock Accessible Interpretive Trail

Map 2: Project Location Map

U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management
MEDFORD DISTRICT
April 2005

No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual or aggregate use with other data. Original data were compiled from various sources. This information may not meet National Map Accuracy Standards. This product was developed through digital means and may be updated without notification.
1.3.1 Objectives

The following objectives were identified by the Interdisciplinary Team for this project.

- Maintain, protect, or restore relevant and important values of areas of critical environmental concern. Those values are identified as Dwarf Woolly Meadow-Foam, other special status plants and animal species, unique geology and scenic values, and education opportunities. (USDI 1995, 56 and 58)
- Increase recreational and educational opportunities in the Rogue Valley consistent with the Uniform Federal Accessibility Standards or American with Disabilities Act Accessibility Guidelines, as much as possible.

1.4 Need

The underlying need for this project is for increased recreation opportunities in the Rogue Valley that are available to all users. The BLM is mandated to provide accessible programs and facilities for people with disabilities when providing recreation facilities.

Lower Table Rock is located an hour or less from the 260,000 people living in the surrounding Rogue Valley. Nearly 20 percent (51,000 people) of the population 5 years and older was classified as disabled in the 2000 census. While the population of the Rogue Valley has increased by 24 percent since 1990, the population with disabilities has nearly doubled (US Census Bureau 2004).

The current trail on Lower Table Rock does not meet accessibility guidelines because of surface materials, trail width, running slope, and cross slope. Persons in wheelchairs are limited to the paved parking area. Also, a concrete slab leading to the toilets has shifted and now limits wheelchair access.

1.5 Legal Requirements

1.5.1 Conformance with Land Use Plans and Other Documents

- Northwest Forest Plan (Final Supplemental EIS and Record of Decision on Management of Habitat for Late-Successional and Old-Growth Related Species Within the Range of the Northern Spotted Owl) 1994

1.5.2 Relationship to Statutes, Regulations, and Other Plans

Federal Land Policy and Management Act of 1976 – Defines BLM’s organization and provides the basic policy guidance for BLM’s management of public lands.

Oregon and California Railroad Act of 1937 (O&C) – Requires the BLM to manage O&C lands for permanent forest production, in accord with sustained-yield principle. Management of O&C lands must also protect watersheds, regulate streamflow, provide for recreational facilities, and contribute to the economic stability of local communities and industries.

National Environmental Policy Act of 1969 – Requires the preparation of environmental impact statements for Federal projects which may have a significant effect on the environment.

Endangered Species Act of 1973 – Directs Federal agencies to ensure their actions do not jeopardize threatened and endangered species.

Architectural Barriers Act of 1968 (Public Law 90-480) – Requires all buildings and facilities constructed in whole or in part by federal funds must be accessible to, and usable by, physically disabled persons.

Section 504 of the Rehabilitation Act of 1973 – Requires all Federal programs, activities, and services must be accessible to disabled visitors, including those with physical, hearing, visual, and learning impairments.

Archaeological Resources Protection Act of 1979 – Protects archaeological resources and sites on federally-
administered lands. Imposes criminal and civil penalties for removing archaeological items from federal lands without a permit.

**Medford District Integrated Weed Management Plan of 1998** – Provides a proactive ecosystem-based approach to reduce populations of alien plant species to a level which will allow for the restoration of native plant species, and provide for overall ecosystem health.

### 1.6 Scoping and Identification of Issues

#### 1.6.1 Scoping

Letters were mailed to 36 individuals, organizations, businesses, and government agencies on December 22, 2004. The letter requested comments pertaining to issues or concerns about the proposed project. A total of two comment letters were received from the Nature Conservancy and Oregon Department of Fish and Wildlife. The Nature Conservancy comments addressed introduction of noxious weeds, protection of native species, heavy clay soils and the natural movement of water, future fire management on the Table Rocks, and consistency with the existing interpretive panels. Oregon Department of Fish and Wildlife was concerned about the location of the trail in regards to riparian areas and wetlands.

The Interdisciplinary Team coordinated with Bob Rose, Americans with Disabilities Act Consultant from Handicap Awareness and Support League, in the development of the trail proposal. The Team incorporated his concerns about designing accessibility into the interpretive trail while preserving the natural experience for the trail users. Mr. Rose’s involvement was invaluable in the final design and layout of the trail.

#### 1.6.2 Issues Addressed in Detail

Based on input from the public and the Interdisciplinary Team, the following issues were identified: accessibility (including slopes, safety, resting areas, and trail surface materials), preserving and interpreting the natural experience, drainage (including soils and hydrology), potential for the spread of noxious weeds, and protecting native species.

#### 1.6.3 Issues Not Addressed in Detail

The following issues identified during scoping were discussed by the Interdisciplinary Team and were considered not relevant for purposes of analysis for this project.

**Fire.** The Nature Conservancy mentioned wildfire and prescribed fire management as concerns at Lower Table Rock. The BLM recognizes there is a need for a fire management plan between the three land managers on Upper and Lower Table Rocks: The Nature Conservancy, Rogue River Ranch, and the BLM. Fire was a natural part of ecosystems found in the ACEC and needs to be returned in order to preserve the historic vegetation pattern. However, a fire management plan is beyond the scope of this proposal. It is felt that use associated with the proposed trail would have little, if any, additional effects on either natural or human-caused fire.

**Riparian Areas.** Oregon Department of Fish and Wildlife expressed concerns about activities within riparian areas in the project area and impacts on Snider Creek, a fish-bearing stream located outside the project area. No perennial streams or riparian areas are found within the project area. Only a few defined stream channels are present in the project area and those channels do not directly enter Snider Creek. Trail construction would occur outside the wet season when soil moisture content is less than 25 percent (see Section 3.3, Hydrology, and Section 3.4, Soil). Therefore, there would be no increased effects on water or sediment entering Snider Creek.
2.0 Alternatives

2.1 Introduction

The intent of this project is to provide additional recreation and education opportunities for people with disabilities. The project would comply with BLM policy to "...provide the highest level of accessibility possible and feasible for people with disabilities to facilities, programs, services, and activities, consistent with BLM's mandate of multiple-use management and dispersed recreational use of the public lands." The needs of people with disabilities must be considered in the design of BLM facilities and programs.

Traditionally, trail design has been based on the function and structure of an 'average' person. While no one specific trail will meet everyone's needs, abilities, and interests, making a trail accessible for people with disabilities will also provide a wider variety of opportunities for all users.

The composition of our population has changed radically in recent decades. The proportion of older adults is increasing; approximately 20 percent of Americans have a disability and the percentage is increasing; people are living longer, sometimes with less function; and over 50 percent of American are obese (Kirschbaum, et al. 2001, 12-9). “Designers should consider whether they would be able to enjoy the trail and benefit from all aspects of the trail experience if they were: unable to hear; using crutches; unable to see; using a wheelchair for mobility; using a powered scooter for mobility; 90 years old; lacking in energy; not physically fit; 8 years old; unable to concentrate; or unable to read or not able to read the local language” (Kirschbaum, et al. 2001, 12-3).

2.2 Alternatives

The proposed action contains two alternatives: Alternative 1 (No Action) and Alternative 2 (Proposed Action).

2.2.1 Alternative 1 – No Action

Under the No Action Alternative, current management would continue. No new trail construction would occur and project needs would not be met. Lower Table Rock Trail would remain accessible only to visitors without impairments.

2.2.2 Alternative 2 – Proposed Action

The proposed action would include the following:

1. Upgrade the first 500 feet of existing trail and construct approximately ½ mile of new trail using Americans with Disability Act Accessibility Guidelines to comply with the Architectural Barriers Act.
   - Trail width: 60 inches.
   - Cross Slope: no greater than 2 percent.
   - Running Slope: maximum slope would be 5.5 percent.
   - Clear overhead room: 85 inches preferred and no less than 80 inches.
   - Surface: firm, stable, slip-resistant; crushed rock ¾-inch minus; color that contrasts with adjacent area.
   - Access: The existing power line road and a portion of an old road bed would be used as access for trail-building equipment during trail construction. Rock material located in the section of old road bed from the existing trail to the lower end of the proposed trail would be used, where needed, during trail construction for fill material. The portion of the old road bed used for access would be ripped the same season as used and planted with native plant materials.

2. Install seven fixed benches with armrests and backs the entire length of the bench.
   - Front edge of seat: 17 inches minimum and 19 inches maximum from the ground.
   - Clear ground space (see Figure 1): no more than 2% slope; minimum 30 inches by 48 inches at one end of bench to allow wheelchair users to be seated shoulder-to-shoulder with someone on the bench.

\[\text{Figure 1. Clear ground space}\]
3. Install four interpretive panels
   - Height from ground: maximum 48 inches from the center of the panel.
   - Angle of sign: 45 degrees.
   - Clear ground space: no more than 2% slope; 30 inches by 48 inches in front of panel.
   - Incorporate design from existing interpretive panels and adapt for visitors with visual impairments.
4. Install trailhead information sign (see Figure 2)
   - Location: parking area near arch.
   - Information: minimum information - trail name, permitted users (hikers, motorized mobility devices, service animals), trail length, average and maximum running slope, average and maximum cross slope, average and minimum tread width, type of surface, accessibility rating. May also include map of trail, trail profile, and hazards.
   - Clear ground space: 30 inches by 48 inches in front of sign.
5. Install directional signs
   - Locations: at each trail intersection and/or where accessibility rating changes.
   - Information: Accessibility rating, direction of trail.
6. Improve accessibility to restrooms
   - Install overlay of asphalt to provide ramp access to toilets.
   - Slope: Use the least possible slope; maximum 1 inch rise for 12 inches of run.
7. Install trail counter, site register, or both

2.3 Project Design Features

The following Project Design Features are included in the design of the proposed project. These Project Design Features are a set of resource protection measures identified by the EA interdisciplinary team. The Project Design Features would serve as a basis for resource protection in the implementation of this project and will be considered in the analysis of impacts from the project.

1. All areas with exposed soil due to disturbance would be seeded with appropriate native grass seed; planted with forbs, brush, and hardwoods; and/or planted with native grass plugs to reestablish vegetation, reduce weed invasion, and reduce erosion.
2. All areas with exposed soil due to disturbance would be mulched with straw certified weed-free.
3. Plant sources would be inspected for nonnative plants before use.
4. Existing vegetation would be brushed back from the trail corridor. Trees and brush flagged by the Contracting Officer's Representative would remain undisturbed.
5. Large brushed material would be left on-site for coarse woody debris. Fines would be hauled off-site for disposal.
6. All crushed rock staging deposits and disposal sites for excess material would be preapproved and located away from Special Status plant populations.
7. All equipment would be cleaned prior to arrival on-site to prevent noxious weed introduction.
8. All imported rock and crushed aggregate would come from an established quarry to minimize the presence of noxious weeds.
9. Cultural sites found in the project area would be mitigated.
10. If an archaeological site is discovered during the project, work would stop and the BLM would be notified within 12 hours.
11. If Special Status plants are encountered along the proposed trail location, mitigation measures would be applied. Mitigation would be determined based on species, site-specific environmental conditions, and species-specific management recommendations.
12. If a Special Status plant site is discovered during the project, work would stop and the BLM would be notified within 12 hours.
13. Contracted work would begin after the completion of the BLM Table Rock Environmental Education Program hiking season, approximately June 4.
14. All ground-disturbing activities, including hauling of materials on unsurfaced roads, would be restricted when soil moisture content exceeds 25 percent by weight to prevent soil compaction and erosion.
15. Noxious weeds would be treated prior to trail construction. The project area would be monitored for noxious weeds after project completion.

3.0 Affected Environment and Environmental Consequences

Chapter 3 contains the relevant resources found in the project area that may be affected by the alternatives. After each resource’s affected environment description, the impacts of the no action and proposed action alternatives are analyzed under the same resource heading.

The following critical elements have been analyzed and will not be affected: Air Quality; Farm Lands (prime or unique); Floodplains; Native American Religious Concerns; Wastes, Hazardous or Solid; Water Quality, Drinking/Ground; Wetlands/Riparian Zones; Wild and Scenic Rivers; Wild Horse and Burros; and Wilderness.

3.1 Recreation and Environmental Education

3.1.1 Affected Environment

Lower Table Rock Trail is a 3.5 mile hike (1.75 miles one-way) to the top of the mesa and back. It gains 800 feet in elevation from the trailhead to the top. The existing trail is designated for day-use only and is located on lands managed by the BLM and The Nature Conservancy. An estimated 4,500 people hike this trail each year. The trail is used year-round and peak use occurs in March through May when the wildflowers are in bloom. A second peak in use occurs in September and October. Trail users include “urban hikers,” who live in local urban and suburban areas, grade school students, and athletes who run or jog the trail. Informal trails, made by hikers going off-trail, are scattered throughout the project area.

The Lower Table Rock trailhead contains a paved parking area with designated accessible parking spaces. A vault toilet and trash receptacles are available adjacent to the parking area. The toilet is fully accessible except for a threshold that limits entry. Six Kodak interpretive panels, located along the first ¼ mile of trail, provide information and interpretation on management of the Table Rocks, geology, fire ecology, Native American culture, settlement, and plant communities. The trail is not accessible to people with disabilities due to its narrow width, steep slopes, and loose surface materials.

The Butte Falls Resource Area Environmental Education program has offered guided interpretive hikes on Upper and Lower Table Rocks since 1983. The guided hikes primarily involve school groups, with elementary school students being the main participants. Participation in this program has grown from about 1,400 students in 1992 to nearly 3,600 students in 2004. Approximately 1,500 students hiked the Lower Table Rock Trail on BLM-guided hikes in 2004. Students with disabilities are not included in these hikes due to the lack of accessibility. Currently, requests for guided hikes with the elderly, students with disabilities, and preschool children are not met.

3.1.2 Environmental Consequences

3.1.2.1 Effects of Alternative 1 (No Action) on Recreation and Environmental Education

Direct and Indirect Effects
In Alternative 1, the No Action Alternative, no trail construction would occur. The Lower Table Rock Trail would remain inaccessible for the entire length of the trail. The need for increased accessible trails would not be met. The Table Rock Environmental Education program guided hikes would continue to be unavailable to students with disabilities. The toilet would also remain inaccessible to people with disabilities. Hikers would continue to create unplanned and undesignated trails throughout the project area.

Cumulative Effects
No additional impacts to Recreation and Environmental Education would result from Alternative 1.
3.1.2.2 Effects of Alternative 2 (Proposed Action) on Recreation and Environmental Education

Direct and Indirect Effects
In Alternative 2, the Proposed Action, 500 feet of existing trail would be made accessible and about $\frac{1}{2}$ mile of new construction would occur. This would increase recreation opportunities in the Rogue Valley for persons with disabilities, as well as the elderly, the very young, and those physically unable to use the trail in its current condition.

One primary objective of ACEC designation for this area, education opportunities, would be enhanced by construction of this interpretive trail. The Table Rocks Environmental Education Program would be able to offer guided hikes on Lower Table Rock to previously excluded groups, such as retirement home residents, disabled veteran’s groups, people with visual impairments, people in wheelchairs, and preschool children. The installation of interpretive panels on the proposed trail would also increase education opportunities for those people using the trail without a hike leader. More people would be able to experience the outdoors in a desired destination. The popularity of the Table Rock Environmental Education Program attests to the public’s desire to learn more about the natural environment in general and the Table Rocks specifically.

The proposed trail would allow people with mobility issues to venture away from the parking area and into the natural environment. The interpretive loop would permit trail users to travel through several plant communities (oak savanna, oak woodland, and chaparral), view and listen to birds, and obtain views of Upper and Lower Table Rocks without power lines in the foreground. The proposed trail would wind through meadows and oak stands. The selection of gravel for the surface material would provide a firm and stable trail. The gravel would have a more natural look and feel than an asphalt or concrete trail surface. The trail user would feel as if they were in a setting more natural than developed.

Short-term, hiking on the Lower Table Rock Trail would be disrupted during trail construction. However, by starting trail work after the guided hike season is over (see Section 2.4, Project Design Features, number 14), the majority of hikers would not experience any disturbance. In the long-term, construction of this trail would increase visitation to Lower Table Rock, however, the increase would occur in a currently unused portion of the ACEC. Visitation to the top of Lower Table Rock would not be expected to increase from construction of this interpretive loop. Demands on the facilities (parking and restrooms) would increase as a result. Because the trail would be located off the existing trail, current trail users should not be impacted.

The installation of a trailhead sign and directional signs would allow people with disabilities to assess what portions of the trail they could safely access. Trail users would be less likely to enter an area that is above their level of ability.

Cumulative Effects
The population of the Rogue Valley and the disabled community is expected to continue to grow. As population increases, the demand for recreation opportunities also increases. The addition of a trail that is both accessible and interpretive would alleviate impacts on existing recreation facilities and trails in the local area.

3.2 Special Status Plants, Noxious Weeds, and Nonnative Plants

3.2.1 Affected Environment
One of the primary objectives for Upper and Lower Table Rock ACEC is to protect Special Status plants. Special Status plants include vascular plants, lichens, bryophytes, and fungi in the following categories: 1) T&E (Federal Threatened and Endangered); 2) State Threatened and Endangered; and 3) Bureau Special Status Sensitive and Assessment. BLM policy is to conserve T&E species and the ecosystems on which they depend and ensure actions authorized on BLM-administered lands do not contribute to the need to list Bureau Special Status species under the provisions of the ESA (Endangered Species Act) (USDI 2003). Bureau Tracking species are species for which more data is needed to determine their rarity. Occurrence data is collected for these species but they are not considered Special Status species for management purposes.

The proposed trail on Lower Table Rock is within the range of all three T&E plants occurring in the Butte Falls Resource Area – *Fritillaria gentneri* (Gentner’s fritillary), *Lomatium cookii* (Cook’s lomatium), and *Limnanthes floccosa* ssp *grandiflora* (large-flowered meadowfoam). The project area contains oak woodlands and patches
of chaparral which are potential habitat for *Fritillaria gentneri*, *Lomatium cookii* and *Limnanthes floccosa* ssp. *grandiflora* are both associated with vernal pools or vernally-wet areas. While there are some vernally-wet areas where the trail would be constructed and an associated species (*Limnanthes floccosa* ssp. *floccosa*) of the large-flowered meadowfoam occurs there, the habitat is not highly suitable for these two T&E plants. Another meadowfoam relative, the State Endangered *Limnanthes floccosa* ssp. *pumila* (dwarf wooly meadowfoam), grows only on the tops of Upper and Lower Table Rocks and would not be affected by the proposed project.

The general area of the proposed trail was surveyed for vascular plants in 1998 and no T&E plants were discovered. Since T&E surveys are only valid for 5 years, the proposed project area would be surveyed again in spring 2005 for the 3 T&E plants, as well as the Special Status vascular and nonvascular plants. Preproject surveys for fungi are not required (USDA and USDI 2004, 3) and the project area does not contain suitable habitat for any of the 10 Sensitive fungi on the Medford District list.

Although no Special Status plant species are currently known in the vicinity of the project area, several vascular and nonvascular species have been documented on Upper and Lower Table Rocks or grow in habitats similar to those found on the Table Rocks. See Appendix A, Botany, for a list of Special Status plant species that could occur in the project area.

The lower slopes of Lower Table Rock, including the 40-acre BLM-administered parcel containing the project area, have been altered from pre-historic conditions over the past 150 years. Foot trails transect the parcel, although only the main trail is heavily used. Hikers consistently collect wildflowers, in spite of signage against the practice. A power line and access road cross the eastern part of the parcel. A large, paved parking lot was constructed and vault toilets were installed in the northeast corner in 1999. Fire exclusion has resulted in development of less open oak savanna and more dense shrub and early seral oak components.

These changes have resulted in disrupted natural ecological processes, such as fire and hydrology, and have altered native plant communities. Noxious weeds and nonnative grasses and forbs have replaced some native plant species. Several populations of yellow star-thistle (*Centaurea solstitialis*) were reported during surveys in 1998 in the general area of the proposed trail. Open grassy areas also contain nonnative grasses and forbs, including St. John’s wort (*Hypericum perforatum*), medusahead (*Taeniatherum caput-medusae*), hedgehog dogtail (*Cynosurus echinatus*), ripgut brome (*Bromus rigidus*), and cheat grass (*Bromus tectorum*). While nonnative plants are widespread throughout the 40-acre parcel, many native species populations have persisted and are intact. The plant communities on the Lower Table Rock continue to provide suitable habitat for Special Status plants.

### 3.2.2 Environmental Consequences

#### 3.2.2.1 Effects of Alternative 1 (No Action) on Special Status Plants, Noxious Weeds, and Nonnative Plants

**Direct and Indirect Effects**

No direct or indirect effects to Special Status plants would occur if this project did not take place. Noxious weeds would continue to increase in the project area as a result of recreational use on Lower Table Rock and agricultural use on surrounding private lands. However, any treatment of noxious weeds in the project area would occur under the Medford District Integrated Weed Management Plan.

Use of the existing trails would continue to increase and potential threats to Special Status plants would remain. In the absence of fire, wedgeleaf ceanothus would continue to encroach into open grasslands and oak woodlands. Special Status plants that depend on more open conditions may be shaded out. In the event of a wildfire, the dense brush and trees would burn at a higher intensity than would have historically occurred. This would result in greater damage to Special Status plants than would occur under a more frequent fire regime with a lower severity burn.

Noxious weeds would continue to increase and compete with Special Status plants. Wildflower collecting would continue, in spite of signage and educational efforts to discourage it. Removing the flowers of annual species before they have matured and set seed means they will not bloom the following year, resulting in declining population numbers. Even perennial species would eventually decline in numbers and lose genetic diversity if over-collected. Special Status plant populations would be most vulnerable to impacts along the trails and on the top of Lower Table Rock. Populations in other areas on Lower Table Rock are protected from collecting by dense vegetation.
3.2.2.2 Effects of Alternative 2 (Proposed Action) on Special Status Plants, Noxious Weeds, and Nonnative Plants

Direct and Indirect Effects

*Fritillaria gentneri*, *Lomatium cookii*, or *Limnanthes floccosa* ssp *grandiflora* plants have not been documented on Lower Table Rock. The proposed project would have “no affect” on these three T&E plants. If T&E plants are discovered during the surveys in spring 2005, the sites would be protected according to the required Project Design Criteria in the 2004-2008 programmatic consultation and BO #1-14-03-F-511. For new trail construction projects, those Project Design Criteria include surveying suitable habitat in the project area prior to the decision, identifying sites, and protecting occupied habitat using 100-foot buffers.

It is unknown if Special Status plants occur in the project area. If Special Status plants are discovered during the spring 2005 surveys, they would be protected from the impacts of trail construction through implementation of Project Design Features. The trail construction would not lead to listing any Special Status plants.

If Special Status plant populations occur within the project area, they could be negatively impacted from the trail construction if not protected. Direct impacts would include damage to or destruction of vascular plants or disturbance of seedbeds. Plants would be destroyed if the trail was built over them or their seeds. *Hedwigia detonsa* could be damaged if the rocks they grow on were disturbed during trail construction or were used as in-trail structures. *Funaria muhlenbergii* would be destroyed if the soil it grows on or the rocks it grows under were disturbed during construction.

Special Status plants in the project area could be indirectly impacted by trail construction if they are adjacent to, but not directly on, the proposed trail. Suitable habitat for Special Status plants to colonize from adjacent areas would be lost. Noxious weeds or nonnative species that compete with Special Status vascular plants for resources could be introduced or spread during trail construction. New trail construction in the ACEC could increase Special Status plant collection along the new trail. Most rare plants potentially present in the area are annuals which rely on the production and setting of seed each year to regenerate. Removing the flowers of annual species before they have matured and set seed means they will not bloom the following year, resulting in declining population numbers. Even perennial species would eventually suffer loss of genetic diversity and decline in numbers if over-collected. If populations of these species occur along the new trail, they would be vulnerable to extirpation from over-collecting, particularly those with few plants. Species that grow in moist or vernal-wet habitats, such as the *Navarretia* and *Plagiobothrys* species, could die out at their sites if the moisture regime was changed during trail construction or during culvert, ditch, or waterbar installation.

The proposed new trail construction would disturb soil and open new areas to potential invasion by noxious weeds and nonnative plants already present at the base of Lower Table Rock. New noxious weed seeds could also be brought in on the tires of motorized equipment or in imported gravel, rock, and other materials used during trail construction. Noxious weeds and nonnative plants would compete with and displace native plants the ACEC was designated to protect. Project design features would help limit the spread of existing populations and the introduction of new noxious weeds or nonnative species.

Some Special Status plants have many populations across their ranges with many individuals per population. Others have only a few sites with few individuals. The level of protection for each species depends on its rarity and the degree of potential impacts. The loss of individual plants would not threaten some species population or viability and would not contribute to listing. Other species could be vulnerable to the loss of even a few individuals in any of its populations. Most species are not monitored or are not monitored to the extent that models could predict at what point a loss of individuals would lead to listing. Decisions on protecting populations are based on the best available information about the species and trends in their known populations.

Preconstruction surveys, implementation of site-specific project design features during project implementation, and a weed control program would contribute to the protection of Special Status plant species and would mitigate direct or indirect effects from the trail construction.

Strategies to protect Special Status plants from impacts as a result of the new trail include:

- Surveying the proposed trail route and adjacent areas prior to trail construction,
Lower Table Rock Accessible Interpretive Trail EA

- Moving the trail to avoid T&E and Special Status Sensitive and Assessment populations,
- Requiring motorized vehicles used during construction to be washed prior to entering the project area,
- Requiring imported materials to be weed-free,
- Treating noxious weeds prior to trail construction and monitoring the area for weeds after project completion, and
- Seeding and mulching disturbed soil with native plant materials after project completion

Cumulative Effects
It is likely past trail and road building, construction, agriculture, and recreational activities have impacted Special Status plant populations on Lower Table Rock. Populations of some species have been lost or decreased in numbers from direct impacts, collecting, and competition from nonnative species. Fire exclusion has reduced suitable habitat for some species that require more open growing conditions, such as Microseris laciniata ssp detlingii. As the population of the Rogue Valley increases, recreational use of the Table Rocks is also expected to increase. Pressure on Special Status plants on both Upper and Lower Table Rock would increase as a result of increased public use, collecting, noxious weeds, and fire exclusion. The addition of this trail would add to those impacts if Special Status plants are located adjacent to the new trail. Implementation of Project Design Features would minimize those impacts. This project would not contribute to a need to list and would not adversely affect existing T&E plants.

3.3 Hydrology (surface flows)

3.3.1 Affected Environment
Due to the high clay content of the soils on the lower to mid-slopes of the Table Rocks, infiltration rate and permeability is very slow. This results in rapid runoff during intense or long-duration rain events. Since there are only a few defined stream channels on this portion of the landscape, overland flow is extremely diffuse (unchannelized) and easily intercepted by old jeep roads, old fire lines, and hiking trails.

No perennial streams or riparian areas are located within the project area. Slope gradients are low, with sideslopes less than 20 percent. All overland and stream flows from the project area are intercepted by the ditchline of the county road and are ultimately dispersed onto a private agricultural field via a culvert. There is an extremely low probability that flow from the project area reaches any live or fishery streams.

3.3.2 Environmental Consequences

3.3.2.1 Effects of Alternative 1 (No Action) on Hydrology
Under Alternative 1 (No Action) no impacts to hydrology would result if the proposed project did not occur.

3.3.2.2 Effects of Alternative 2 (Proposed Action) on Hydrology
Indirect and Direct Effects
The trail design, which includes properly-sized culverts in the draws, appropriate trail surfacing, and proper use of geo-textile fabric, would reduce the risk of damage caused by interception of overland flow from the trail. In some areas where the trail traverses the slope, overland flow could be intercepted and redirected or rechannelized. If this occurred, the effect would be localized and would not travel off-site. With the implementation of project design features and the low slope gradients in the project area, effects on stream flows are expected to be negligible.

Cumulative Effects
No additional impacts to hydrology would occur from Alternative 2.
3.4 Soil

3.4.1 Affected Environment

The existing trail occurs on soil mapped as Carney clay. Coker clay soil is mapped nearby to the southeast. The Soil Survey of Jackson County Area, Oregon (1993) describes the soils that formed in the project area to be part of the Carney Soil Series and Coker Soil Series. Both these soil series are classified as fine to very fine montmorillonitic\(^1\) clays. These soils have high shrink-swell potential and low strength.

Carney clay develops in alluvial fans and may form on hill slopes. This soil forms from alluvium\(^2\) and colluviums\(^3\) derived from igneous rocks. It is moderately deep, 20 to 40 inches, to highly weathered volcanic rocks, and moderately well-drained, although permeability is very slow. It has high shrink-swell potential, low strength, and is droughty. The high clay content is greater than 35 percent and can form deep cracks as the soil dries in the summer. On slopes of one percent to five percent, the runoff rate is low and the hazard potential for water erosion is slight. On slopes of 5 percent to 20 percent, the runoff rate is slow to medium and the hazard potential for water erosion is slight to moderate. On steeper slopes, the hazard due to water erosion increases. Compaction, which occurs when this soil is wet, can lead to excessive runoff and subsequent erosion.

Coker clay forms from clayey alluvium derived from igneous rocks, predominantly tuff and breccias. It is very deep, 60 inches or greater, and somewhat poorly drained with very slow permeability. On slopes of 3 percent to 12 percent, the runoff rate is very slow and the resulting hazard due to water erosion is slight. It has high clay content and tends to stay wet in the winter and is dry in the summer. Deep cracks form in the soil when it dries; it has a high shrink-swell potential and low strength.

Soils high in clay typically have critical moisture content limitations for construction. In the wet season, they swell and become very plastic and sticky, making it difficult to excavate or compact. In the dry season, the same clayey soils can become cracked and hardened.

3.4.2 Environmental Consequences

3.4.2.1 Effects of Alternative 1 (No Action) on Soil

Direct and Indirect Effects

Under Alternative 1 (No Action,) no impacts to soil would result if the proposed project did not occur.

Cumulative Effects

No additional impacts to soil would occur from Alternative 1.

3.4.2.2 Effects of Alternative 2 (Proposed Action) on Soil

Direct and Indirect Effects

Under Alternative 2, trail construction would have minimal impacts on soil erosion and sedimentation. Minor amounts of soil compaction would occur adjacent to areas of new construction from equipment operation. Minor localized erosion would occur in areas of ditch and water bar construction. This would occur primarily in the first winter after construction, due to the lack of established vegetation. Planting and seeding native species would reduce erosion soon after reestablishment. Trail design features, such as installation of geotextile fabric and increased depth of surfacing rock, would reduce future trail damage that may result from the shrink and swell properties of the clayey soils.

Cumulative Effects

No additional impacts to soil would occur from Alternative 2.

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\(^1\) Montmorillonite – any of a group of clay minerals and their chemical varieties that swell in water.

\(^2\) Alluvium - clay, silt, sand, gravel, or similar detrital material deposited by running water.

\(^3\) Colluvium - rock detritus and soil accumulated at the foot of a slope.
3.5 Cultural Resources

3.5.1 Affected Environment

Historically and pre-historically the project area has had a rich occurrence of history which includes Native American land use patterns and habitation, as well as pioneer settlement. The encompassing area that included the Table Rocks to Evans Creek was the site of a temporary Takelma Indian reservation from 1853 to 1856. After the Rogue Indian Wars of 1855 and 1856, the remaining Takelma were moved to reservations to the north.

After 1856, agriculture developed around the Table Rocks. In 1872, a Table Rock post office opened up, followed by a school district in 1879. Recreational hikers began to enjoy the Table Rocks during the late 1800s and early 1900s. Development ensued as more grazing lands were cleared, dirt roads were built, and an airstrip was constructed on the top of Lower Table Rock. For a short period during WWII, the Table Rocks and adjacent Camp White areas were used as training grounds for 30,000 troops, trained for the North African War Campaign, from Camp White. In 1978, the Nature Conservancy began a successful campaign to raise $500,000 to preserve the Rocks and prevent the construction of a subdivision in the bowl of Lower Table Rock (Atwood 1994-5: 531). In 1984, the BLM-administered lands were designated as ACEC.

The general area has received archaeological surveys; these surveys include BF 97-6, BF 98-73, and BF 94-2 for the parking lots and vault toilets, and a survey along the Pacific Power 500 kilovolt power line. In 2001, Upper and Lower Table Rock trails were surveyed for trail repair work. Because of the Table Rocks ideal location adjacent to the Rogue River and due to the historical and pre-historical known character, it is expected future surveys will locate cultural resource sites.

3.5.2 Environmental Consequences

3.5.2.1 Effects of Alternative 1 (No Action) on Cultural Resources

Direct and Indirect Effects

Under Alternative 1 (No Action,) no impacts to cultural resources would result if the proposed project did not occur.

Cumulative Effects

No additional impacts to cultural resources would occur under Alternative 1.

3.5.2.2 Effects of Alternative 2 (Proposed Action) on Cultural Resources

Direct and Indirect Effects

The area has been surveyed for archeological resources and prehistoric sites have been recorded in the general area. Prior to the beginning of this project, the District Archeologist would be notified so trail construction in certain areas can be observed. Construction of this trail may expose subsurface remains. If this occurs, the project would be halted and the artifacts recorded. It is expected this construction would have a minimal impact on known cultural artifacts.

Cumulative Effects

Increased development on adjacent private lands could uncover cultural resources. Discovery of new sites would draw more attention to the region’s cultural resources and artifacts. This would increase the potential for unauthorized excavation of these sites, but would also increase knowledge of pre-historic use.

3.6 Areas of Critical Environmental Concern

The primary objectives of the Table Rocks ACEC are to maintain, protect, or restore “dwarf wooly meadow-foam, other special status plant and animal species, unique geology and scenic values, and education opportunities” (USDI 1995, 58). This project falls on a 40-acre parcel within the Table Rock ACEC.

Impacts to Dwarf wooly meadow-foam and other Special Status plant species are addressed in Section 3.2 Special
Status Plants, Noxious Weeds, and Nonnative Plants. This project would not lead to a need to list Bureau Status and Assessment plant species.

Impacts to Special Status wildlife species are included in Appendix B - Wildlife. There are no wildlife issues for Bureau Sensitive or Bureau Assessment species. The proposed project would have no effect or negligible effect on sensitive species. The project would not lead to a need to list any species as federally threatened.

Impacts to education opportunities are covered in Section 3.2 Recreation and Environmental Education. Environmental education would be enhanced by construction of an interpretive trail. The trail would allow for an expansion of the current Table Rock Environmental Education Program to include people with disabilities.

Impacts to unique geology and scenic values would not occur from this project. No unique geology is present in the project area. The scenic values of Lower Table Rock would not be impacted by the addition of an interpretive trail. The presence of shrubs and grass would screen the interpretive trail from view from the parking area. Vegetation would also screen the view of the new trail from most of the existing trail. A natural surface would be used and vegetation would be planted on soil exposed during trail construction.

### 3.7 Environmental Justice

Executive Order 12898 (*Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, February, 1994) requires all federal agencies to “make achieving Environmental Justice part of [their] mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.”

In the 2000 Census, 16.6 percent (388,740 people) of Oregon residents, 12.5 percent (22,269 people) of Jackson County residents, and 15 percent (11,193 people) of Josephine County residents were living below the poverty level. The population of the area by race and origin is shown in Table 1.

<table>
<thead>
<tr>
<th>One Race</th>
<th>Oregon</th>
<th>Jackson County</th>
<th>Josephine County</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>2,961,623</td>
<td>166,125</td>
<td>71,103</td>
</tr>
<tr>
<td>Black or African American</td>
<td>55,662</td>
<td>724</td>
<td>202</td>
</tr>
<tr>
<td>American Indian and Alaska Native</td>
<td>45,211</td>
<td>1,980</td>
<td>949</td>
</tr>
<tr>
<td>Asian</td>
<td>101,350</td>
<td>1,631</td>
<td>476</td>
</tr>
<tr>
<td>Native Hawaiian and Other Pacific Islander</td>
<td>7,976</td>
<td>322</td>
<td>83</td>
</tr>
<tr>
<td>Some Other Race</td>
<td>144,832</td>
<td>5,218</td>
<td>883</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>104,745</td>
<td>5,269</td>
<td>2,030</td>
</tr>
<tr>
<td>Total</td>
<td>3,421,399</td>
<td>181,269</td>
<td>75,726</td>
</tr>
<tr>
<td>Hispanic or Latino (of any race)</td>
<td>275,314</td>
<td>12,126</td>
<td>3,229</td>
</tr>
</tbody>
</table>

**Source:** 2000 Census

There would be no disproportionately high and adverse effects on minority or low-income populations as a result of the proposed project. Programs and facilities at Lower Table Rock would remain open and available to all races and income levels. Construction of an accessible trail would add to the total miles of trails available to all users in the local area.
4.0 List of Agencies and Persons Consulted

4.1 Public Involvement
Letters were mailed to the following during the scoping process:

**Agencies**
- United Stated Environmental Protection Agency
- Oregon Department of Fish and Wildlife
- Oregon Department of Forestry
- Oregon Commission for the Blind
- Southern Oregon Education Service District

**Schools**
- Oregon State University
- Southern Oregon State University

**Organizations**
- Dogs for the Deaf
- Oregon Natural Resources Council
- Siskiyou Project
- Handicap Awareness and Support League
- Klamath Siskiyou Wildland Center
- The Nature Conservancy
- Headwaters
- Audubon Society
- Disability Advocacy for Social and Independent Living

**Individuals**
- 15 Neighbors, Property Owners, and Interested Individuals

4.2 List of Preparers

Randy Bryan, Civil Engineering Technician  
B.T. Mechanical Engineering, Oregon Institute of Technology; 31 years BLM.

Linda Hale, Wildlife Biologist  
B.S. Biology, Southern Oregon State College; 15 years BLM.

Diane Parry, Geologist  
B.S. Geology, Humboldt State University; 19 years BLM.


Leah Schrodt, Environmental Education Specialist  
B.A. with emphasis in Cultural/Latin American Studies, Spanish and Fine Arts, The Evergreen State College; 5 years BLM.

Ken Van Etten, Soil Scientist  
B.S. Soil Science, Cal State Polytechnical University at Pomona; 27 years BLM.

Robyn Wicks, Natural Resource Specialist  
B.S. Resource Recreation Management, Oregon State University; 15 years BLM.

Marcia Wineteer, Botanist  
B.A. American Studies, Brigham Young University; M.S. Environmental Education/Botany, Southern Oregon State University; 7 years BLM.

Jean Williams, Environmental Specialist  
B.S. Environmental Interpretation/Education, Oregon State University; 13 years BLM.
4.3 Availability of Document and Comment Procedures

A public notice informing the public of the availability of this EA will be published in the Medford Mail Tribune. Copies of the EA document will be available for public review at the Medford District Office. The document will also be published on the Medford District Planning web site at http://www.or.blm.gov/Medford/planning/environmental_assessments.htm
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References


USDA, US Forest Service, Rogue River and Siskiyou National Forest and USDI, Bureau of Land Management, Medford District Office. 2003. Rogue River/South Coast Biological Assessment FY04-08 for Activities that may affect listed species in the Rogue River/South Coast Province and Biological Opinion (U.S. Fish and Wildlife Service) 1-14-03-F-511 October 20, 2003.


Appendices

Appendix A - Special Status Plants

The following species could occur in the project area and could potentially be impacted by the trail construction:

*Funaria muhlenbergii* (bryophyte) - Bureau Assessment
This tiny moss is less than a centimeter tall. Typical habitat is on mineral soil in xeric, rocky scablands and chaparral, often in the shelter of large boulders or rock outcrops. It is often overlooked and can be difficult to identify except in the spring when the sporophytes are emerged. The Butte Falls Resource Area contains 16 of the 39 sites documented on the Medford District. It has not yet been documented on either Table Rock, but nonvascular surveys have not been conducted in habitat where it occurs.

*Hedwigia detonsa* (bryophyte) - Bureau Tracking
This moss is found on rock outcrops, cliffs, or boulders in chaparral, oak woodland, or mixed hardwood-conifer woodlands. The Butte Falls Resource Area contains 3 of the 19 sites documented on the Medford District. One site is located on the flanks of Upper Table Rock.

*Meconella oregana* (white fairy poppy) - Bureau Sensitive
White fairy poppy, a tiny annual herb, blooms in April and May and typically grows in chaparral on moist sandy or gravelly soils. One site was discovered in spring 2002 beside the Lower Table Rock Trail on The Nature Conservancy land. The Butte Falls Resource Area contains five of the six sites documented on the Medford District. Because it is a native associated with moist areas, its population numbers may fluctuate and the exact location of individual plants may vary from year to year, making it difficult to accurately delineate the extent of the population boundaries.

*Microseris laciniata ssp detlingii* (Detling’s silverpuffs) - Bureau Sensitive
Detling’s silverpuff, a yellow-flowered member of the Aster family, is a perennial that blooms in June and July. It was first reported in Oregon in 1997, although it is more common in California. Typical habitat is in chaparral and grassy openings among Oregon white oak trees. The Butte Falls Resource Area contains 64 of the 90 sites reported in the Medford District. Several sites have been documented on the flanks of Upper Table Rock in habitat similar to that found in the project area.

*Minuartia californica* (California sandwort) - Bureau Tracking
California sandwort, a small, white-flowered annual, blooms in April and May. Typical habitat is on sandy or gravelly slopes, on grassy ridges, and in patches of chaparral. The Butte Falls Resource Area contains all four sites documented on the Medford District. It grows on the tops of both Upper and Lower Table Rocks.

*Navarretia heterandra* (Tehama navarretia) - Bureau Assessment
Tehama navarretia, a small annual, blooms in May and June. Petals are white with purple spots in the throat. Typical habitat is in heavy soils in vernal pools or on wet or drying flats. The Butte Falls Resource Area contains 16 of the 17 sites documented on the Medford District. It has not been documented on either Upper or Lower Table Rock.

*Navarretia leucocephala* (White-flowered navarretia) - Bureau Tracking
White-flowered navarretia, a small white-flowered annual, blooms in early summer. Typical habitat is in vernal pools or vernaly wet areas. The Butte Falls Resource Area contains the two sites documented on the Medford District. One site is located on the top of Upper Table Rock.

*Navarretia subuligera* (Awl-leaf navarretia) - Bureau Tracking
Awl-leaf navarretia, a small, white-flowered annual, blooms in early summer. Typical habitat is in open, rocky, wet places. The Butte Falls Resource Area contains all six sites documented on the Medford District. It has not been documented on either Upper or Lower Table Rock.

*Navarretia tagetina* (marigold navarretia) - Bureau Tracking
Marigold navarretia, a blue-flowered annual, blooms in early summer. Typical habitat is in open, grassy flats and
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...vernally-wet areas. The Butte Falls Resource Area contains 20 of the 21 documented sites in the Medford District. Nine sites are located on the flanks and top of Upper Table Rock.

*Plagiobothrys austiniae* (Austin’s popcorn flower) - Bureau Assessment
Austin’s popcorn flower, a white-flowered annual, blooms in April and May. Typical habitat is in vernal pools and other wet sites. The Butte Falls Resource Area contains 10 of the 11 sites on the Medford District. It grows in vernally-wet areas on the tops of Upper and Lower Table Rocks.

*Plagiobothrys greenei* (Greene’s popcorn flower) - Bureau Assessment
Greene’s popcorn flower, a white-flowered annual, blooms in the spring. Typical habitat is at the edges of vernal pools or in vernally-wet grasslands. The Butte Fall Resource Area contains all 12 sites documented on the Medford District. It occurs on the tops of Upper and Lower Table Rocks.

*Plagiobothrys glyptocarpus* (sculptured popcornflower) - Bureau Assessment
Sculptured popcornflower, a white-flowered annual, blooms in April and May. Typical habitat is in moist grasslands and woodlands below the 2,000 foot elevation. The Butte Falls Resource Area contains 49 of the 54 sites documented on the Medford District. It has not been documented on either Upper or Lower Table Rock.
Appendix B – Wildlife

Affected Environment
No threatened or endangered species are present in the project area. The proposed project area is habitat for wild turkeys, quail, deer, squirrels, mice, western skink, alligator lizards, western fence lizards, sharp tailed snakes, gopher snakes, rattlesnakes, spotted towhee, and blue-gray gnatcatchers. One rattlesnake den is present within the proposed site. Rattlesnakes are not on the Medford BLM sensitive species list.

Effects of the Proposed Action on Wildlife

Direct and Indirect Effects
Trail building activities would cause wildlife to move away from the area during construction. Some larger species would move away from the new trail when people are present. However, these animals continue to use the area near the existing trail and impacts to animals in the area are expected to be negligible. The proposed trail would be located away from the rattlesnake den in order to protect the den and reduce encounters between humans and rattlesnakes.

A review of the BLM Bureau Sensitive List species was completed (see Table B-1). There are no wildlife issues for Bureau Sensitive or Bureau Assessment species. The proposed project would have no effect or negligible effect on sensitive species. The project would not lead to a need to list any species as federally threatened.

<table>
<thead>
<tr>
<th>Table B-1. Summary of Wildlife Sensitive Species Effects Determination</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Species</strong></td>
</tr>
<tr>
<td>Bald eagle</td>
</tr>
<tr>
<td>Fisher</td>
</tr>
<tr>
<td>Mardon skipper butterfly</td>
</tr>
<tr>
<td>Northern spotted owl</td>
</tr>
<tr>
<td>Vernal pool fairy shrimp</td>
</tr>
<tr>
<td>Black-backed woodpecker</td>
</tr>
<tr>
<td>Burrowing owl</td>
</tr>
<tr>
<td>Crater Lake tightcoil</td>
</tr>
<tr>
<td>Ferruginous hawk</td>
</tr>
<tr>
<td>Flammulated owl</td>
</tr>
<tr>
<td>Lewis’ woodpecker</td>
</tr>
<tr>
<td>Monadenia chaceana</td>
</tr>
<tr>
<td>Oregon shoulderband (snail) HEHE</td>
</tr>
<tr>
<td>Oregon vesper sparrow</td>
</tr>
<tr>
<td>Peregrine falcon</td>
</tr>
</tbody>
</table>
### Table B-1. Summary of Wildlife Sensitive Species Effects Determination

<table>
<thead>
<tr>
<th>Species</th>
<th>Determination</th>
<th>Rationale for determination</th>
</tr>
</thead>
<tbody>
<tr>
<td>Siskiyou short-horned grasshopper</td>
<td>If present, effects would likely be negligible. Would not lead to the need for federal listing.</td>
<td>No reports of species in area. Found in the Cascades Mountains. Associated with elderberry. Unlikely to be present. Adequate grassland habitat would be left after trail is constructed. They could move away from disturbance.</td>
</tr>
<tr>
<td>Streaked horned lark</td>
<td>No effect</td>
<td>Horned larks have been extirpated from the Rogue Valley. May migrate through area.</td>
</tr>
<tr>
<td>Three-toed woodpecker</td>
<td>No effect</td>
<td>Range overlaps with spruce trees. No habitat in project area.</td>
</tr>
<tr>
<td>Townsend’s big-eared bat</td>
<td>No effect</td>
<td>Proposed project would not remove habitat.</td>
</tr>
<tr>
<td>White-headed woodpecker</td>
<td>No effect</td>
<td>Not present in the proposed project area.</td>
</tr>
<tr>
<td>Foothill yellow-legged frog</td>
<td>No effect</td>
<td>Not habitat in project area.</td>
</tr>
<tr>
<td>Fringed myotis</td>
<td>No effect</td>
<td>Proposed project would not remove habitat.</td>
</tr>
<tr>
<td>Pallid bat</td>
<td>No effect</td>
<td>Proposed project would not remove habitat.</td>
</tr>
<tr>
<td>Tri-colored blackbird (KM breeding population)</td>
<td>Negligible effect</td>
<td>Present in Denman Wildlife refuge. They have not been found to breed in proposed project area.</td>
</tr>
<tr>
<td>White-tailed kite</td>
<td>No effect</td>
<td>Proposed trail would not remove nesting habitat. Present in the agricultural lands near Table Rocks and may forage in the area.</td>
</tr>
</tbody>
</table>

### Cumulative Effects of the Proposed Action

No additional cumulative effects to wildlife would occur.