



United States Department of the Interior



BUREAU OF LAND MANAGEMENT

Mother Lode Field Office
5152 Hillside Circle
El Dorado Hills, CA 95762-5713
www.blm.gov/ca/motherlode

Davis Mill window treatment project (CA-180-14-24) Finding of No Significant Impact April 2014

It is my determination that this decision will not result in significant impacts to the quality of the human environment. Anticipated impacts are within the range of impacts addressed in the Sierra Resource Management Plan/Final Environmental Impact Statement. The proposed action does not constitute a major federal action having a significant effect on the human environment; therefore, an environmental impact statement is not necessary and will not be prepared. This conclusion is based on my consideration of CEQ's following criteria for significance (40 CFR §1508.27), regarding the context and intensity of the impacts described in the EA, and based on my understanding of the project:

- 1) *Impacts can be both beneficial and adverse and a significant effect may exist regardless of the perceived balance of effects.* Potential impacts include temporary noise due to construction. However, none of these impacts would be significant at the local level or cumulatively because of the small scale of the project.
- 2) *The degree of the impact on public health or safety.* No aspects of the proposed have been identified as having the potential to significantly and adversely impact public health or safety. In fact, the project is designed to help the Davis Mill building standing; therefore protecting public health and safety.
- 3) *Unique characteristics of the geographic area.* The project area does not have any unique characteristics. Soil, vegetation, wildlife, and cultural resources are all typical for the area.
- 4) *The degree to which the effects on the quality of the human environment are likely to be highly controversial effects.* No anticipated effects have been identified that are scientifically controversial. As a factor for determining within the meaning of 40 C.F.R. § 1508.27(b)(4) whether or not to prepare a detailed environmental impact statement, "controversy" is not equated with "the existence of opposition to a use." *Northwest Environmental Defense Center v. Bonneville Power Administration*, 117 F.3d 1520, 1536 (9th Cir. 1997). "The term 'highly controversial' refers to instances in which 'a substantial dispute exists as to the size, nature, or effect of the major federal action rather than the mere existence of opposition to a use.'" *Hells Canyon Preservation Council v. Jacoby*, 9 F.Supp.2d 1216, 1242 (D. Or. 1998).
- 5) *The degree to which the possible effects on the human environment are likely to be highly uncertain or involve unique or unknown risks.* The analysis does not show that this action would involve any unique or unknown risks.

6) *The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.* Proactive preservation of historic buildings on BLM-administered land is not precedent setting.

7) *Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.* No significant cumulative impacts have been identified. The project is consistent with the actions and impacts anticipated in the Sierra Resource Management Plan and its associated environmental impact statement.

8) *The degree to which the action may adversely affect National Historic Register listed or eligible to be listed sites or may cause loss or destruction of significant scientific, cultural or historical resources.* The project will not affect cultural resources listed on or eligible for the National Register of Historic Places. In fact, it will specifically help to protect a historically significant mill building.

9) *The degree to which the action may adversely affect ESA listed species or critical habitat.* No ESA listed species (or their habitat) will be affected by the proposed action.

10) *Whether the action threatens a violation of environmental protection law or requirements.* There is no indication that this decision will result in actions that will threaten such a violation.

William S. Haigh
Field Manager, Mother Lode Field Office

Date



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EA Number: CA-180-14-24

Proposed Action: Davis Mill window treatment project

Location: MDM, T 17 N, R 9 E, Nevada County, CA

1.0 Purpose of and Need for Action

1.1 Need for Action

The Bureau of Land Management's Mother Lode Field Office (BLM) is soliciting the services of a qualified Design/Build Contractor (DBC), with historic preservation experience, to replace all exterior window openings on the Davis Mill building. The project is intended to prevent moisture from entering the building and to help preserve this historically significant building.

The Davis Mill is located on BLM-administered land in Nevada County, CA near Nevada City. It was built around 1915 for processing gold from a nearby mine and was probably abandoned by World War II. It is one of the last surviving stamp mills still standing in the Mother Lode region and is perhaps the Mother Lode Field Office's best and most important mining-related cultural property. In 2005 the BLM contracted Foothill Resources, Ltd. (Foothill Resources) to conduct an architectural history of the Davis Mill. Foothills Resources prepared a report that documented the mill building's history and historic architecture and recommended that the Davis Mill was eligible for inclusion in the National Register of Historic Places. Based on this recommendation, the BLM formally determined that the Davis Mill was a significant cultural property and underwent the process of having it listed on the National Register, under criteria A and C, at the local level of significance. (It was listed in April 2010.)

In 2010 the BLM received funding available under the American Recovery and Reinvestment Act (ARRA) to address safety and historic preservation issues at the Davis Mill. The mill building has sufficient integrity to qualify for listing on the National Register but deterioration of its roofing system, foundation, and other structural elements has become conspicuous in recent years and threatens to undermine this status and cause the building to become unsafe for public visitation. The ARRA funding was used to 1) remove deposits of mill tailings on BLM-administered land at the mill site to prevent contamination of water in Little Rock Creek; and 2) prepare and implement a "Preservation Plan" that provides recommendations on how to preserve the mill building's historic fabric in accordance with 36 CFR 68 - The Secretary of the Interior's Standards for the Treatment of Historic Properties (the Standards).

The Preservation Plan was completed in November 2010 by contractor C3, LLC (C3) based in Greenwood Village, Colorado. It is titled Architectural & Engineering Assessment of the Davis Stamp Mill, Nevada County, California. This report documents existing conditions as a baseline for making recommendations and anticipating long-term effects. The report focuses on assessing the mill

building for structural integrity, intactness, and damaged or deteriorated conditions and provides recommended treatments for addressing each of these conditions. The recommended treatments are believed to be consistent with the Standards.

Due to budget constraints, the BLM and its contractors C3 and Tetra Tech, Inc. were only able to implement a few of the recommended treatments in C3's Architectural & Engineering Assessment report. These included 1) drainage control to prevent water from damaging the building's foundations; 2) fumigation to reduce damage caused by wood-boring insects; and 3) minor structural repairs to replace rotting structural supports at the entrance to the first flight of stairs on the lowest level of the building.

A relatively high priority treatment identified by C3 in 2010 (that was not implemented due to budget constraints) was the replacement of the mill building's exterior windows. Many of the window openings lack coverings. Some of the openings have coverings but these are not considered to be "original" architectural elements (dating to the building's period of significance) and may not be consistent with the Standards. The BLM has periodically installed plastic sheeting as a temporary measure to prevent rain and other moisture from entering the building through the openings that lack coverings; however this has proven to be a very poor solution. Of note, C3 has recommended the installation of window frames manufactured from western red cedar and consistent with early 1900s mill building architecture. Lexan plexiglass would be installed in the frames to help withstand weathering and potential vandalism (i.e., rock throwing, etc.). The potential for vandalism at the mill building is high since the BLM does not have a daily management presence at the site; in other words, the mill site is not a developed recreational site with a full-time staff and visitor use facilities (parking, bathrooms, etc.).

The proposed action – installing/replacing window treatments on the building's exterior – is a critical proactive management project that will help keep the mill building listed on the National Register of Historic Places and will help prevent the building from deteriorating structurally, potentially causing it to become unsafe and even hazardous to the public.

1.2 Conformance with Applicable Land Use Plans

The proposed action is consistent with the Sierra Resource Management Plan, approved in February 2008. On page 15 of the plan, a goal is to identify, preserve, and protect significant cultural resources and ensure they are available for appropriate uses by present and future generations.

2.0 Proposed Action and Alternatives

2.1 Proposed Action

Under the proposed action a qualified Design/Build Contractor (DBC) would install/replace all exterior window treatments on the Davis Mill building. Project-related vehicles, materials, and personnel would be within the mill, immediately adjacent to the mill building, and on existing roads at the mill site. There would be no new ground disturbance. All work would be consistent with the 36 CFR 68 - The Secretary of the Interior's Standards for the Treatment of Historic Properties (the Standards).

2.2 Project Design Features

Project-related work would not be allowed until conditions at the site are relatively dry, probably after April 15.

2.3 No Action

Under the no action alternative, BLM would not install/replace window treatments on the Davis Mill building. The lack of window treatments would continue to subject the inside of the building to temperature and moisture fluctuations, causing it to deteriorate structurally due to wood rot, insect damage, and other causes.

2.4 Alternatives Considered but Eliminated from Detailed Analysis

BLM did not consider any other alternatives in detailed analysis.

3.0 Affected Environment

The Davis Mill was built between 1915 and 1920 for processing gold ore from the Randolph Mine. The mill was built under the auspices of the mine's owner and operator, the Davis family, including mother Eliza and sons William, Arthur, and Harry. The mill appears to have seen its most extensive period of use during the late 1910s and early 1920s. By the late 1920s the family was leasing the mine to the Western Merger Mines Company. In 1931 the company pulled out and the mine and mill came back under the control of the Davis family. Out of work, the brothers gave hardrock mining at the Randolph another try but their efforts proved unprofitable and they were forced to earn a living by other means. Harry, who lived with his wife and mother at the mine, may have operated the Davis Mill intermittently to treat ore from other mines during the 1930s, and possibly during the early 1940s. The mill was completely shut down by the end of the World War II. Remarkably well-preserved, the mill is today a testament to the work of a small family-run mining operation. The mill is also an outstanding example of stampmill vernacular. It exhibits distinctive characteristics of its type, period, and method of construction. The mill has an impressive multistory frame superstructure entirely clad in corrugated metal. The mill was equipped with a typical array of equipment: an ore bin, rock crusher, a five-stamp battery, an amalgamation table, a retort room, and concentrators. Much of this equipment remains in place, providing valuable insight on how the Davis family configured their mill.

The Davis Mill is in its original location on public land on Harmony Ridge, near the South Fork of the Yuba River in the central Sierra Nevada foothills. The flat's immediate surroundings are forested with live oak, black oak, incense cedar, ponderosa pine, dogwood, and madrone. Manzanita, Scotch broom, and mountain misery are the dominant understory plants. The current vegetation is mostly native and, based on photos taken in the late 1920s and early 1930s, appears to resemble the environment that existed at the millsite during early 1900s. The photos suggest that area may have had more ponderosa pine in the past. The pine was probably sold by the Davis family to loggers in the 1930s and 1940s to help pay the bills.

Recreational use of BLM-administered land in the area is considered to be very low. Recreationists visit this area infrequently. There are numerous private residences near the mill site. BLM manages this area in accordance with class III visual resource management (VRM) standards. BLM's objective for class III is to partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate. Management activities may attract attention but should not dominate the view of the casual observer. Changes should repeat basic elements found in the predominant natural features of the characteristic landscape.

4.0 Environmental Effects

The following critical elements have been determined to be unaffected by the proposed action: areas of critical environmental concern, prime/unique farmlands, floodplains, wetlands and riparian zones, wild and scenic rivers, wilderness, and environmental justice.

4.1 Impacts of the Proposed Action and Alternatives

The proposed action would not impact atmospheric, water, or soil resources. Project-related vehicles, materials, and personnel would be within the mill, immediately adjacent to the mill building, and on existing roads at the mill site. There would be no new ground disturbance.

The BLM botanist analyzed the impacts of the project on botanical resources, especially special status plants. The analysis was designed to help BLM meet its obligations under the Endangered Species Act. He did not find any special status plants affected by the proposed action. The botanist recommended that the proposed action would not affect threatened and endangered plants or other BLM special status plants. Project-related vehicles, materials, and personnel would be within the mill, immediately adjacent to the mill building, and on existing roads at the mill site. There would be no new ground disturbance. There would be no negative effects to vegetation.

The BLM wildlife biologist analyzed the impacts of the project on wildlife, especially on special status wildlife. Her analysis was designed to help BLM meet its obligations under the Endangered Species Act. The biologist recommended that the project would have negligible short-term impacts on wildlife due to elevated noise levels and other disturbances associated with construction work. There would be no impacts on threatened and endangered wildlife or other BLM special status wildlife.

The BLM archaeologist conducted a cultural resource study of the project area to determine whether significant cultural resources could be affected by the proposed action. The study was designed to help BLM meet its obligations under Section 106 of the Historic Preservation Act. The BLM archaeologist found that the proposed action would help protect a historically significant cultural resource—the Davis Mill. Effects to the Davis Mill would be “not adverse.” No places of traditional religious and cultural significance to Native Americans would be affected.

The proposed action would not negatively impact recreational use. Recreational use is very uncommon in the area affected by the proposed action. Recreation could be impacted, for a short period of time, during project implementation.

The proposed project would have a negligible temporary impact on visual resources. BLM manages the area in accordance with VRM class III standards, and the proposed action is in line with the management objective for this class, which is to partially retain the existing character of the landscape.

4.2 Impacts of the No Action Alternative

There would be no negative impacts to the environment except to cultural resources, specifically the significant Davis Mill. The lack of window treatments would continue to subject the inside of the building to temperature and moisture fluctuations, causing it to deteriorate structurally due to wood rot, insect damage, and other causes. The building could deteriorate to a point that it becomes unsafe and a public hazard.

4.3 Cumulative Impacts

Negative cumulative impacts are not anticipated. The proposed action would not impact significant biological and cultural resources. The proposed action would not negatively impact atmospheric, water, and soil resources, nor would it negatively affect visual resources and recreation. The proposed action is expected to have beneficial cumulative impact on historically significant buildings and wildfire protection.

5.0 Agencies and Persons Consulted

No outside agencies were consulted.

5.1 Authors

James Barnes, BLM NEPA coordinator/archaeologist

5.2 BLM Interdisciplinary Team/Reviewers:

/s/ James Barnes *3/13/14*

NEPA Coordinator/Archaeologist Date

/s/ Jeff Babcock *03/13/2014*

Engineer Date

/s/ Beth S. Brenneman *3/12/14*

Botanist Date

/s/ Peggy Cranston *3/12/14*

Wildlife Biologist Date

/s/ Jeff Horn *3/13/14*

Outdoor Recreation Planner/VRM Specialist Date

5.3 Availability of Document and Comment Procedures

This EA will be posted on Mother Lode Field Office's website (www.blm.gov/ca/motherlode) under NEPA and would be available for a 15-day public review period. The EA is also available by mail upon request during this 15-day public review period. Comments should be sent to James Barnes at Bureau of Land Management, Mother Lode Field Office, 5152 Hillside Circle, El Dorado, CA, 95762, or emailed to jjbarnes@blm.gov.