



# United States Department of the Interior



## BUREAU OF LAND MANAGEMENT

Mother Lode Field Office

5152 Hillsdale Circle

El Dorado Hills, CA 95762

www.blm.gov/ca/motherlode

### Chung Wah and Indian Diggings cemeteries maintenance and upkeep projects (CA-180-11-24) Finding of No Significant Impact April 2011

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 vegetation removal and temporary noise and dust due to cutting vegetation. 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 action have been identified as having the potential to significantly and adversely impact public health or safety.
- 3) *Unique characteristics of the geographic area.* The project area does not have any unique characteristics. Soils, vegetation, and wildlife 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 the proposed 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.* Cutting vegetation, repairing fences, and doing other minor maintenance work 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 affect cultural resources listed on or eligible for the National Register of Historic Places. This effect will not be adverse. It will be beneficial to the resources.

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



# United States Department of the Interior



## BUREAU OF LAND MANAGEMENT

Mother Lode Field Office  
5152 Hillsdale Circle  
El Dorado Hills, CA 95762  
[www.blm.gov/ca/motherlode](http://www.blm.gov/ca/motherlode)

**EA Number:** CA-180-11-24

**Proposed Action:** Chung Wah and Indian Diggings cemeteries maintenance and upkeep projects

**Location:** Chung Wah cemetery: Block 70, Mormon and Natoma streets, City of Folsom, 1 BM 7 and a portion of Section 2, MDBM, T 9 N, R 7 E (approximately 2 acres)

Indian Diggings cemetery: MDBM, T 8 N, R 13 E, Section 18 (approximately 2.5 acres)

(Refer to the project area maps attached)

## 1.0 Purpose of and Need for Action

### 1.1 Need for Action

Two historic cemeteries located on public lands managed by the Bureau of Land Management's Mother Lode Field Office (BLM) are in need of routine maintenance and upkeep. These cemeteries are the Chung Wah Chinese cemetery in Folsom in Sacramento County and the Indian Diggings Cemetery near Omo Ranch in El Dorado County. The Chung Wah cemetery is listed on the National Register of Historic Places. BLM staff conducted a brush removal/cleanup project here more than 10 years ago, before it came under BLM ownership. A local member of the public and advocate for preserving the cemetery has been mowing grass to help prevent wildfire ignition. Some additional brush clearing, mowing, and other minor maintenance work could be of great benefit in terms of fire prevention and the general upkeep of the cemetery. Portion of the surrounding fence may also be in need of repair.

At the Indian Diggings cemetery, near Omo Ranch, whiteleaf manzanita, black oak volunteers, and other woody plant species are growing up within the cemetery, obscuring views of gravestones. The roots of these plants may also, eventually, cause disturbance. The fence enclosing the cemetery is in disrepair. The BLM considers the Indian Diggings cemetery to be potentially significant (eligible for inclusion on the National Register), pending a formal evaluation.

Neither cemetery is well known to the public and is probably infrequently visited. Under the Sierra RMP, the BLM is directed to preserve significant cultural resources. The BLM is also specifically directed to work with the County to maintain the cemetery. There is no agreement yet. The BLM proposes to use a hand crew to reduce overgrown vegetation, repair fences, and do other routine maintenance and upkeep work at the two cemeteries to help preserve their historic setting and character.

### 1.2 Conformance with Applicable Land Use Plans

The proposed action is consistent with the Sierra Resource Management Plan, approved in February 2008, and the Mother Lode Field Office Fire Management Plan, approved in March 2008. The Sierra Resource Management Plan's Record of Decision (page 17) gives BLM the following two goals, which are consistent with the proposed action: 1). identify, preserve, and protect significant cultural

resources and ensure they are available for appropriate uses by present and future generations; 2). reduce imminent threats and resolve potential conflicts from natural or human-caused deterioration, or potential conflicts with other resource uses.

## **2.0 Proposed Action and Alternatives**

### **2.1 Proposed Action**

The proposed action is to have a hand crew use hand-held tools to trim overgrown vegetation, repair fences, and conduct other non-ground-disturbing maintenance and upkeep activities at two historic-era cemeteries on BLM-administered land. The crew would access the two project areas in vehicles on existing roads. The proposed work would be done by hand using chainsaws, string trimmers, and other hand-held tools.

Under the proposed action, the BLM has the option of removing any and all manzanita and other brushy species within the cemeteries, though some brush may be selectively left to protect sensitive portions of the cemeteries. Any dead vegetation less than six inches in diameter would be cut and removed. Live trees with trunks less than 6 inches in diameter as measured six inches above the ground would be cut and removed, though it is possible that some trees could be left if they add to the cemetery's setting and would not eventually cause disturbance. Tree trunks would be cut flush with the ground. Ladder fuels (branches) would be removed on the lower third (or up to 8 ft) on trees not cut down. Generally grasses and forbs would be cut with a string trimmer or some other suitable trimmer or mower.

All cut vegetation would be cut up and scattered on BLM-administered land. It is possible that a chipper could be used to help reduce vegetation. The chipper would be staged on existing roads. Cut vegetation would be dragged to the chipper. Chipped material would be dispersed on BLM-administered land. No new roads or trails would be created or constructed.

Any fence repairs would be handled by the hand crew using standard tools and methods. The fence would be repaired in place. It may be necessary to put in additional fence posts. The BLM would attempt to repair the fence in a way that is consistent with the cemetery's character and setting.

Other maintenance and upkeep activities may include removing litter and modern items not appropriate to the cemeteries, resetting toppled gravestones, putting up informational signs, etc. Aside from putting in new fence posts, no ground-disturbing activity would occur.

This proposed action would be undertaken for a period of five years from the date it is authorized.

### **2.2 Project Design Features**

There are no project design features.

### **2.3 No Action**

Under the no action alternative, BLM would not conduct vegetation clearing, fence repairs, and other maintenance and upkeep activities at the two cemeteries.

### **2.4 Alternatives Considered but Eliminated from Detailed Analysis**

BLM did not consider any other alternatives in detailed analysis.

## **3.0 Affected Environment**

The project areas contain two very different environmental settings. The Chug Wah cemetery is located on the outskirts of the city of Folsom, on the edge of dredge mining fields along the American

River (now Lake Natomas). The elevation is roughly 100 ft above sea level, at the Central Valley-Sierran foothill transition. The vegetation within the cemetery consists of dense gray pine and live oak woodland with openings. The understory varies from grassy clearings to thickets of poison oak and buckeye.

Indian Diggings cemetery is located at 3200 ft above sea level, along On It Creek, in the west-central Sierra Nevada. Pondoersa pine, black oak, and live oak are the dominant tree species. There are decadent stands of whiteleaf manzanita in the understory around the cemetery and this species is encroaching on the cemetery. Black oak volunteers also coming up within the cemetery.

Neither project area is located on lands with a specific designation such as Areas of Critical Environmental Concern, Wild and Scenic River, Wilderness, Wilderness Study Area, etc.

Recreational use of BLM-administered land within the project area is considered to be very low. Under the Sierra RMP, BLM manages the two project areas in accordance with visual resource management class III guidelines. 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 considered in this environmental assessment, and unless specifically mentioned later in this EA, 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 negatively impact atmospheric, water, or soil resources. The two areas that would be treated are relatively small in size. The use of hand tools within these areas is expected to cause very little, if no, soil disturbance. Cut brush and other fuels would be cut up and dispersed for biomass. Using a chipper to process cut vegetation, as proposed, could create some dust, but not enough to affect air quality. The chipper would be brought in and staged on existing roads.

The BLM botanist analyzed the impacts of the proposed action on botanical resources, especially special status plants. The analysis was designed to help BLM meet its obligations under the Endangered Species Act and other special status policy. Special status plants have not been found within the project areas. The botanist recommends that the proposed action would not affect threatened and endangered plants or other BLM special status plants. Vegetation that would be treated within the variance area is commonplace and would potentially grow back if there are not follow up maintenance.

The BLM wildlife biologist analyzed the impacts of the proposed action on wildlife, especially on special status wildlife. Her analysis was designed to help BLM meet its obligations under the Endangered Species Act and other special status policy. The wildlife biologist recommends that the project would have negligible short-term impacts on wildlife due to temporary noise and dust when fuels are cut and masticated. There would be no impacts to 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 would be affected by the proposed action. The study was designed to help BLM meet its obligations under Section 106 of the Historic Preservation Act and other authorities. The

BLM archaeologist found that the two cemeteries are significant (and potentially significant) cultural resources that would be affected by the proposed action. However, these effects would not be adverse and would be, in fact, beneficial to the resources. The goal of the proposed action is maintenance and upkeep to help preserve the character and setting of the cemeteries over the next five years. The integrity of the cemeteries is being negatively affected by overgrown and dead vegetation, collapsing boundary fences, litter, etc. Whiteleaf manzanita, black oak volunteers, and other woody plant species are growing up within the Indian Diggings Cemetery, obscuring views of gravestones. The roots of these plants may also, eventually, cause disturbance. The work would be closely supervised by the BLM archaeologist and would be done in a way that protects sensitive portions of the cemeteries.

The proposed action would not negatively impact recreational use. Recreational use is uncommon in the two areas affected by the proposed action. Recreation could be impacted, temporarily, during project implementation.

The proposed project would not negatively impact 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 retain the existing character of the landscape.

#### **4.2 Impacts of the No Action Alternative**

The goal of the proposed action is to help preserve the setting and character of the cemeteries. Without the proposed action the integrity of the cemeteries would continue to be negatively affected by overgrown and dead vegetation, collapsing boundary fences, litter and modern debris. Whiteleaf manzanita, black oak volunteers, and other woody plant species are growing up within the Indian Diggings Cemetery, obscuring views of gravestones. The roots of these plants may also, eventually, cause disturbance.

#### **4.3 Cumulative Impacts**

Negative cumulative impacts are not anticipated. The proposed action would not negatively impact significant biological and cultural resources. The proposed action would not impact atmospheric, water, and soil resources. The proposed action would have negligible short-term impacts on commonplace plants and wildlife. The proposed action would be cumulatively good for the preservation of rural historic cemeteries.

## 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* 3/23/11

---

NEPA Coordinator/Archaeologist Date

*/s/ Lauren Fety* 3/21/11

---

Botanist Date

*/s/ Peggy Cranston* 3/18/11

---

Wildlife Biologist Date

*/s/ Jeff Horn* 3/18/11

---

Outdoor Recreation Planner 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](http://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](mailto:jjbarnes@blm.gov).