



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

Ponderosa Park clearing (CA-180-11-12) Finding of No Significant Impact February 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 (RMP)/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 proposed action:

1) Impacts can be both beneficial and adverse and a significant effect may exist regardless of the perceived balance of effects. Potential impacts include negligible soil disturbance caused by the use of a chipper and temporary dust due to chipping/mastication of vegetation. However, none of these impacts would be significant at the local or regional scale (cumulatively) because of the small scale of the proposed action. Visual resources may be negatively impacted, depending on the eye of the beholder, but these impacts are in accordance with management goals and objectives stated in the Sierra RMP and are not considered significant. BLM's visual resource management standards for the area would be met. Of critical concern is the preservation of the uncommon mafic/ultramafic soils underlying the project area and the rare plant community (including a diversity of woody species) that these soils support. The vegetation community was not found within the area potentially affected by the project, probably due to the development of the park. If rare plants are discovered, the project design features of the EA will ensure that these important environmental resources are preserved. The uncommon soils would be preserved, also. The chipper would be staged on an existing road within the developed park site. The chipped vegetation would be broadcast in the project/treatment area and would serve as a mulch layer, helping to reduce soil erosion.

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. In fact, the project is designed to help firefighters fight wildfire, thus, protecting public health and safety, especially for local residents.

3) Unique characteristics of the geographic area. The area affected by the proposed action contains a mafic/ultramafic substrate. The area is near a vegetation community—McNab cypress woodland—including special status plants associated with this substrate. This characteristic is rare, not unique, though some of the plants are rare endemics. However, they would not be negatively affected. The special status plants were not found within the project area and, if found, would be avoided by project design. Impacts to the soils derived from the mafic/ultramafic substrate would be negligible.

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.* Clearing brush using hand crews and a chipper is not precedent setting. BLM undertakes these types of projects on a regular basis.

7) *Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.* No significant cumulative impacts have been identified. The proposed action is consistent with the actions and impacts anticipated in the Sierra RMP.

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 proposed action would not affect cultural resources listed on or eligible for the National Register of Historic Places.

9) *The degree to which the action may adversely affect ESA listed species or critical habitat.* Since no ESA listed plants—including the federally listed Layne’s butterweed—have been found within the project area, the US Fish and Wildlife Service was not consulted.

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

William S. Haigh
Field Manager, Mother Lode Field Office

Date



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EA Number: CA-180-11-12

Project Name: Ponderosa Park clearing

Location: MDM, T 19 N, R 6 E, Section 34, Brownsville, Yuba County, CA (see attached map)

1.0 Purpose of and Need for Action

1.1 Need for Action

The Bureau of Land Management's Mother Lode Field Office (BLM) manages scattered public lands on the outskirts of the community of Brownsville, Yuba County. Much of this area has not experienced wildfire in decades. Manzanita and other fuels have grown, increasing the possibility of a catastrophic wildfire. The area where the proposed action would occur is part of a larger area of BLM-administered land leased by Yuba County for recreation and public purposes. The lease area contains ball fields, hiking trails, and other facilities collectively known as Ponderosa Park (the park). The lessee has requested that brush clearing be done along an existing road/trail within the park to 1) help protect certain facilities, as well as homes on adjacent private property, from wildfire; 2) help "spruce up" the park (give it a more park-like appearance); and 3) create better views of certain park facilities like the amphitheatre which may discourage vandalism. There is definite need to implement the proposed action. However, the bigger reason for BLM's involvement is so that we can begin to become a lot more active in the management of vegetation within the lease area because this area contains habitat, or potential habitat, for rare plants including a rare flannelbush and the federally listed Layne's Butterweed.

1.2 Conformance with Applicable Land Use Plans

The proposed action—to clear brush on public land—is consistent with the Sierra Resource Management Plan, approved in February 2008. The Sierra Resource Management Plan's Record of Decision (pages 15-16) gives BLM the goal of establishing a cost-efficient fire management program commensurate with threats to life, property, public safety, and environmental resources. BLM's objectives for meeting these goals are to 1) reduce the risk of wildfire in WUI communities; 2) reduce the risk of catastrophic wildfire through fuels management; 3) use prescribed fire, mechanical, and biological treatments to reduce fuels and promote ecosystem diversity and resilience, control invasive species, reduce fuel hazard, improve wildlife habitat, increase water yield, and enhance watersheds. The Folsom/Mother Lode Field Office Fire Management Plan, approved in March 2008, gives BLM various fire and fuels treatment objectives and strategies for specific lands under BLM's administration. Specific objectives and strategies for the fire management unit, in which the project area is located, are laid out in the plan. The proposed action is consistent with these objectives and strategies.

2.0 Proposed Action and Alternatives

2.1 Proposed Action

The proposed action is to clear brush along an existing trail within Ponderosa Park—an area leased by Yuba County under the Recreation and Public Purposes Act. The clearing would be done by a hand crew (i.e., BLM fuels crew, inmates, Hotshots, contractor, etc.) under BLM supervision. The total area to be cleared is less than 1 acre. The following methods would be used:

1. BLM-supervised hand crew would do the clearing.
2. Hand tools only would be used.
3. BLM chipper would be staged and operated on the existing trail/road only. The chipper would not be moved off the existing trail/road surface.
4. If possible, the chipped vegetation would not be broadcast into the treatment area. The chipped vegetation would be disposed of offsite (i.e., putting them on the edge of existing trails/roads in a 2 ft or 3 ft strips within the park).
5. The treatment area would strictly follow the map/aerial photo attached to this EA. The north side of the trail/road would be treated only (not both sides of the trail/road). Vegetation within the portion of the project area located next to the park amphitheatre (north of the trail) would be cleared just wide enough to provide a clearing/view that would discourage vandalism of facilities and help protect them from wildfire. However, east from the pond (just east of the amphitheatre), the clearing would shrink to 10 ft wide since there are no facilities at risk in this area. An onsite BLM monitor would decide how wide to cut brush.
6. To be treated: shrubs and pines < 6 inches DBH.

2.2 Project Design Features

A geologic substrate of gabbro underlies the project area and the general area, according to geologic mapping. Soil-mapping specialists found that this substrate contains mafic intrusive igneous rock substrate, tending toward ultramafic. On BLM-administered land in the general area (including on leased land) this substrate supports a rare plant community including a diversity of woody species, some of which like McNab cypress are serpentine or serpentine-gabbro endemics (see sections below for more information). Other plant species present are associated with these uncommon geologic substrates, although they are not substrate endemics. Minimizing adverse impacts to the uncommon and diverse plant community is critical. The vegetation associated with this uncommon soil substrate has not been found within the project area, probably due to development of the park. In particular BLM botanists have not identified rare plants within the area potentially affected by the proposed action. However, rare plants do occur on BLM-administered land in the vicinity (including within the area leased to the County). These plants include the federally threatened species Layne's butterweed (*Packera layneae*) and a dwarf flannelbush (*Fremontodendron sp.*) which should be treated in the same way as other special status species (see the Affected Environment section below for rationale).

Ensuring that these rare species are not negatively affected by brush clearing activities is critical. Any negative effects to the rare plants, albeit small, must be avoided. Again, rare plants have, to date, not been found within the project area. However, if discoveries are made during or before implementation of the proposed action, BLM botanists would use flagging tape to mark each rare plant or group of plants within the project area. These flagged areas must be avoided. Vegetation would not be treated within these areas. Chipped vegetation must not be broadcast over these areas. A BLM botanist/monitor would be onsite during implementation of the proposed action to double check for rare plant occurrences and ensure that brush clearing occurs.

A buffer of at least 15 feet would be maintained around any rare plant discovery. For the federally listed Layne's butterweed, the buffer would be 30 ft. The 15 ft buffer around *Fremontodendron* occurrences should ensure that this species will not be cut or degraded in any way.

Though the rare plants and plant community have not been found specifically within the project area, preserving the uncommon mafic intrusive igneous rock substrate and the soils derived from this substrate is still an issue. In general, impacts to soils would be avoided and brush clearing would be kept to the minimum level that provides for public safety. The chipper would be staged on the existing trail. It would not go off road.

The project area is relatively weed-free. To prevent the spread of weeds to new areas within the BLM parcels and adjacent private lands, all equipment used to implement the proposed action must be thoroughly cleaned of adhering soil and vegetation before entering the project area. Generally, equipment used to implement the proposed action would avoid areas with weed populations.

2.3 No Action

Under the no action alternative, BLM would not clear brush in the subject area.

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 area is located within a BLM-administered parcel near the community of Brownsville in the central Sierra Nevada foothills. Elevations within the project area average 2150 ft above sea level. On BLM-administered land in the area is an uncommon mafic/ultramafic substrate which supports an equally uncommon and diverse mixed chaparral community, along with west side ponderosa pine forest, and stands of McNab cypress. Woody chaparral species include common species like white leaf manzanita, Lemmon's ceanothus, toyon, holly-leaf redberry, as well as locally less common shrubs and small trees like chaparral pea, silk tassel, Brewer's oak, Oregon grape, and dwarf flannelbush. Douglas fir occurs with pine in the canyon of Honcut Creek. McNab cypress is a species usually restricted to ultramafic substrates and is found within the project area.

Uncommon understory species include Sanborn's onion and Butte County fritillary. The plant species of greatest conservation concern are the federally threatened species *Packera layneae* (Layne's butterweed) and a dwarf *Fremontodendron* (dwarf flannelbush). The latter is a close relative of the federally endangered species Pine Hill flannelbush, but research has shown it to be genetically distinct. Currently, the dwarf flannelbush of the Brownsville area/project area has no conservation status and it has not been recognized as a separate taxon, although it has been shown to have a distinct genetic profile (Kelman 2006). Until research occurs that clarifies the taxonomic placement of this population, the conservation of these plants is critical. The project area specifically has been developed into a public park with trails, a ball field, and other facilities, under lease to BLM. As a result, the rare chaparral community is not well preserved within the project area. None of the associated rare plant species have been found within the project area. The project area contains relatively common white leaf manzanita.

This vegetation community is habitat for a variety of wildlife including black bear, coyote, bobcat, grey fox, California quail, Steller's jay, raven, hawks, and eagles. There are numerous private residences in the general area.

Under the Sierra RMP, BLM manages the project area as an extended recreation use area, meaning that recreation management is not a high priority here. This is not to say that recreation and public use are not substantial. The subject area has been leased for recreation and public purposes by Yuba County. The lease provides for a community park (ball fields, picnic grounds, hiking trails, meeting hall, associated parking areas, etc.). The community park receives a fair amount of recreational use. At the park site, fuels reduction has been implemented in the past.

BLM manages the project 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 considered in this environmental assessment, and unless specifically mentioned later in this EA, have been determined to be unaffected by the proposal: 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—brush clearing by a hand crew along an existing road/trail—would cause small or negligible negative impacts to atmospheric, water, or soil resources because the area to be treated is relatively small in size (less than 1 acre). Cutting and chipping of fuels would create some dust, but this would be temporary and would not be enough to seriously affect air quality. There are small seasonal streams in the area. The project area is not located on a major stream. The chipper would be staged on the existing road/trail to help prevent impacts to soils and potential erosion. Of concern are negative effects to the mafic or ultramafic soils found within the project area which are uncommon generally. BLM-administered land near the project area supports rare plant species and an uncommon chaparral plant community. The uncommon chaparral plant community does not occur within the area potentially affected by the proposed action, probably due to the development of the park. No chips would be broadcast to better simulate natural ecosystem processes at these sites. These sites usually lack any substantial litter or duff layer. The seed of species adapted to chaparral sites often fail to germinate or establish if litter or duff is present.

BLM botanists analyzed the impacts of the proposed action on botanical/vegetation resources, especially special status plants. The analysis is designed to help BLM meet its obligations under the Endangered Species Act and other applicable authorities and policies. Rare plants associated with the underlying mafic/ultramafic substrate were not found within the area potentially affected by the proposed action. The uncommon plant community associated with these rare species does not seem to be present within the project area, probably due to the development of the park. The plant community and associated rare plant species are known to occur on BLM-administered land not far from the project area (including within the leased area/park). Therefore, if the rare plants are discovered during project implementation or before, direct negative impacts to these plants would be prevented by avoiding them (please refer to design features 2.2). Cutting operations would not occur in the immediate vicinity of Layne's butterweed or the rare flannelbush. Chips would not be spread on these species. Likewise the chipper would not be used off road in the habitat of these species. Again, the project area is within the developed park site under lease to the County.

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 applicable authorities. The biologist recommended that the proposed actions would not affect threatened and endangered wildlife or other BLM special status wildlife.

The BLM archaeologist conducted a cultural resource study of the proposed actions to determine whether significant cultural resources could be affected by the proposed action. The study included a background records search and field inventory. The study was designed to help BLM meet its obligations under Section 106 of the National Historic Preservation Act. He found that the proposed actions would not affect significant cultural resources. No places of traditional religious and cultural significance to Native Americans would be affected.

The proposed action could perhaps have some negligible short-term impacts on recreational use. Walkers, joggers, bicyclists, and motorists might be inconvenienced temporarily during project implementation due to the noise and dust caused by cutting, chipping, and masticating fuels. This negative impact would be temporary, lasting as long as the proposed action is being implemented (perhaps only a few days at the most). Recreationists would continue to use the project area after the proposed action is completed. This includes initial construction and ongoing maintenance.

The project area is within a developed park and is not known for its visual resources. The proposed action would have a negligible negative impact on visual resources. Brush would be removed, with the exception of areas containing rare plants if they are discovered. The clearing would be visible, but the park would be more visually attractive after understory brush removal than before the clearing occurred. Importantly, the proposed action is in line with BLM's VRM class III management objective which is to partially retain the existing character of the landscape.

4.2 Impacts of the No Action Alternative

Under the no action alternative, there would be no impacts to environmental resources, such as the uncommon soil and vegetation derived from the underlying mafic/ultramafic substrate. However, there could be negative impacts to firefighting efforts and efforts to protect local residents and the Brownville community and their parks from wildfire. The result could be a larger wildfire that impacts environmental resources well beyond the project area. The environmental impacts of such a wildfire could be positive (e.g., enhanced reproduction of some fire dependent species), or they could be negative (e.g., large-scale clearing of habitat by bulldozers in the course of fire suppression for a larger fire). There may also be impacts to private property.

4.3 Cumulative Impacts

The proposed action could have slight negligible negative impacts on mafic/ultramafic soils which are uncommon on the regional and larger geographic scale. BLM would keep mechanized equipment on the established trail to minimize this impact and conserve these soils. The proposed action is expected to have beneficial cumulative impact on wildfire suppression in the area as long as BLM maintains cleared area.

5.0 Agencies and Persons Consulted

The US Fish and Wildlife Service was not consulted since rare plants including the federally listed Layne's butterweed was not found within the area potentially affected by the proposed action.

5.1 Authors

James Barnes, BLM NEPA coordinator/Archaeologist
Lauren Fety, BLM Biology Technician

5.2 BLM Interdisciplinary Team/Reviewers:

<i>/s/ James Barnes</i>	<i>2/8/11</i>
NEPA coordinator/Archaeologist	Date
<i>/s/ Brian Mulhollen</i>	<i>2/7/11</i>
Fuels specialist	Date
<i>/s/ Jeff Horn</i>	<i>2/3/11</i>
Recreation	Date
<i>/s/ Lauren Fety</i>	<i>2/3/11</i>
Botany	Date
<i>/s/ Peggy Cranston</i>	<i>2/3/11</i>
Wildlife	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 will 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 Hills, California 95762 or emailed to jjbarnes@blm.gov.

5.4 References Cited

- Boyd, Robert S. 1996. Ant mediated seed dispersal of the rare chaparral shrub *Fremontodendron decumbens* (Sterculiaceae). *Madrono* 43: 299-315.
- Kelman, W.M., L. Broadhurst, C. Brubaker, and A. Franklin 2006. Genetic relationships among *Fremontodendron* (Sterculiaceae) populations of the central Sierra Nevada foothills of California. *Madrono* 53: 380-387.