



# United States Department of the Interior



## BUREAU OF LAND MANAGEMENT

Mother Lode Field Office

5152 Hillsdale Circle

El Dorado Hills, CA 95762

[www.ca.blm.gov/motherlode](http://www.ca.blm.gov/motherlode)

### Greely Hill fuel break maintenance (CA-180-10-26) Finding of No Significant Impact October 2010

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 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 negligible soil disturbance caused by the use of a rubber-tracked chipper or masticator and temporary dust due to mastication of vegetation and temporary smoke due to burning piled 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 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.

*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; therefore protecting public health and safety, especially for local residents.

*3) Unique characteristics of the geographic area.* The area affected by the proposed action does not have any unique characteristics. Soils, vegetation, and wildlife are all typical of the elevation and terrain in the central Sierra Nevada foothills.

*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.* Fuel break maintenance using hand crews, mechanized equipment (i.e., rubber-tracked chipper, masticator, etc.), and prescribed fire 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.* No ESA listed species (or their habitat) would 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 would result in actions that would threaten such a violation.

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William S. Haigh  
Field Manager, Mother Lode Field Office

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Date



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**EA Number:** CA-180-10-26

**Project Name:** Greeley Hill fuel break maintenance

**Location:** MDM, T 2 S, R 16 E, Sections 13, 14, and 24  
Mariposa 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 the central Sierra Nevada foothills, especially in the chaparral belt and lower yellow pine belt. Due to decades of fire suppression, much of this area has not experienced wildfire in decades. Chaparral and other fuels have become decadent in some locales, increasing the possibility of a high-severity wildfire. At the same time, foothills communities such as Greeley Hill have grown. There are now numerous private residences in the area, including adjacent to BLM-administered parcels containing dense fuels. Local residents are concerned about wildfire. The public lands around these communities are considered to be within the wild land-urban interface (WUI) and the communities are considered "at risk." Some residents are anxious to see public land managers like the BLM take action to reduce fuels on public lands. Fuel breaks are needed to help give firefighters places to hold wildfire or launch suppression efforts. In the past, BLM worked with a local fire safe organization to build a shaded fuel break on prominent ridges on public and private lands near Greeley Hill, now within the project area for the proposed action analyzed in this EA. The fuel break is located near the community of Greeley Hill. The fuel break was constructed to serve as a strategic holding point in the event of a wildfire. The fuel break was authorized under NEPA document CA-018-05-05. Maintenance was not authorized under this NEPA document. Because these fuel breaks are important strategically to fighting wildfire and protecting local communities, BLM would like to maintain them over the next 10 years.

### 1.2 Conformance with Applicable Land Use Plans

The proposed action—to maintain a shaded fuel break on public land near Greeley Hill—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 maintain a shaded fuel break on BLM-administered land near the community of Greeley Hill. **Only maintenance would be authorized under this EA—no construction—because the fuel break is already built.** Original construction of the fuel break was authorized under CA-180-05-05 and appears to have occurred shortly thereafter. Construction was authorized for both BLM and private lands.

A fuel break running east-west through Section 23 and into Section 24 was apparently constructed circa 2005 without environmental review as part of the project authorized under CA-180-05-05. This segment is not shown on any project area maps associated with CA-180-05-05. This segment of fuel break would NOT be maintained under the present EA. Maintenance could only occur after a separate environmental review has occurred and BLM has made the decision to maintain the segment. Another segment of fuel break running north-south in sections 15, 14 and 23 was apparently constructed circa 2005 as part of the project authorized under CA-180-05-05. This fuel break was partially analyzed. There appears to be sufficient cultural and wildlife resource studies but there is insufficient botanical study. This segment of fuel break would NOT be maintained under the present EA. Maintenance could only occur after a botanical study has occurred and BLM has made the decision to maintain the segment.

There are segments of fuel break that were analyzed under CA-180-05-05 but were never built. Construction of these segments must now be authorized under a separate EA. Fuel break construction is NOT covered under this document. Also, BLM has long-term plans to conduct a large-scale broadcast prescribe burn on BLM-administered land in this area, possibly using the existing fuel breaks as fire control lines. Again, prescribed burning is NOT covered under this document. This type of treatment must be authorized under a separate EA.

The fuel break maintenance proposed in this EA would be done by a hand crew (i.e., a BLM fuels crew, an inmate crew, a Hotshot crew, a BLM-selected contractor, etc.) under BLM supervision. No work would occur outside of the areas previously treated (and shown in bold black line on the attached map) and no more than 200 ft wide. Work would occur only on BLM-administered land. In addition to using chainsaws and other hand tools, the crew would use any of the following methods:

1. The crew would feed cut vegetation into a rubber-tracked brush chipper staged on existing roads/trails. The chipped vegetation would be broadcasted over the project area.
2. The crew would pile and prep vegetation in 6 x 6 ft piles for burning at a later date in accordance with a BLM-approved burn plan and other BLM policy.
3. The crew would use a mechanical masticator to grind, chip, and chew vegetation. The masticated vegetation would be broadcasted across the project area, leaving an altered fuel type, which does not reduce the fuels, but rearranges them so they are more manageable in the event of wildfire suppression. Equipment selected to carry out this task would be designed to minimize ground disturbance. Multiple cutting attachments would be used to adapt to the terrain and fuels.

Once completed the fuel break would continue to be maintained at any time over the following 10 years. At the end of this 10-year period, fuel break maintenance would need to be reauthorized, perhaps with a “fresh” NEPA document. This EA would need to be reviewed by the relevant staff to determine whether it is adequate to use to reauthorize maintenance. During the 10-year period,

maintenance would be done by a crew under BLM supervision. The fuel break would be maintained using any or all of the methods described above.

The proposed maintenance work may serve help to create a perimeter for a proposed large-scale broadcast prescribe burn to be analyzed in a separate EA.

Any fuels treatment work (i.e., broadcast prescribed burn) that BLM may propose in the future affecting land outside the scope of the proposed action described above and/or outside of the area analyzed in this EA would be subject to BLM's full environmental review/decision-making process. In other words, a new NEPA document may be needed. Certainly, new cultural and biological recommendations would be needed.

## **2.2 Project Design Features**

To minimize the potential for introduction or spread of invasive weeds, equipment used for the proposed action would be cleaned prior to entering area and, where possible, would avoid operating within weed-infested areas, such as stands of Scotch broom.

## **2.3 No Action**

Under the no action alternative, BLM would not maintain the fuel breaks.

## **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 on BLM-administered parcels in the central Sierra Nevada foothills. Specifically the project area is the tops of prominent ridges near Greely Hill. Elevations within the project area average 3000 ft above sea level.

Vegetation in the project area varies depending on elevation, soils, exposure, soil moisture, microclimates, and other factors. The project area is generally dominated by a mixed ponderosa pine-black oak forest. Understory shrubby species include mountain misery, poison-oak, and white-leaf manzanita. Dense stands of manzanita were treated in 2005 as part of the original construction. These stands are growing back.

This mixed ponderosa pine-black oak forest provides habitat for a variety of wildlife including black bear, coyote, bobcat, grey fox, California quail, Steller's jay, raven, hawks, and eagles. The project area is near the boundary of the Stanislaus National Forest.

Recreational use of the project area is considered to be low. The existing road within the project area is used by walkers, joggers, bicyclists, off-highway vehicle riders. 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 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 would have negligible impacts on atmospheric, water, or soil resources. There are small seasonal streams in the area. The project area is not located on a major stream. The area that would be treated is relatively small in size. Use of a masticator is expected to cause little soil disturbance. The masticator would be staged on the existing road. Masticated brush and other fuels would be dispersed throughout the project area. This layer of mulch would help prevent erosion. Vehicle barriers such as cables, berms, and large boulders may be placed at strategic locations to prevent dirt bikes and other off-highway vehicles from driving within the treated area and causing erosion problems. Cutting and mastication of fuels, as proposed, would create some dust, but not enough to affect air quality. Burning piles of cut vegetation would also have a negligible short-term affect on atmospheric resources.

BLM natural resources specialists associated with BLM's fire program conducted a botanical study of the project area in 2004. They conducted a field inventory in month/year when conditions were suitable for plant identification within the project area. The study was designed to help BLM meet its obligations under the Endangered Species Act and other policies. The BLM botanist has reviewed the study vis-à-vis the proposed action analyzed in this EA. He recommends that the proposed action would not affect threatened and endangered plants or other BLM special status plants. Manzanita and other fuels that would be treated are commonplace and would grow back within a few years. In 2004 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 and other policies. The biologist has reviewed her 2004 study vis-à-vis the proposed action analyzed in this EA. She recommends that the proposed action would not affect threatened and endangered wildlife or other BLM special status wildlife (refer to the study attached).

In 2004 and 2005 the BLM archaeologist conducted cultural resource studies of the project area. The studies included background records search, field inventory, and Native American consultation. The studies were designed to help BLM meet its obligations under Section 106 of the Historic Preservation Act. The BLM archaeologist has reviewed his 2004 and 2005 studies vis-à-vis the proposed action. He recommends that no significant cultural resources would be affected by the proposed action. The cultural resources identified within and near the project area would be flagged for avoidance. They would not be affected. No places of Native American religious and/or cultural significance would be affected (refer to the Section 106 compliance studies/recommendations attached).

The proposed action could have 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 and masticating fuels. Recreationists would continue to use the project area after the project is implemented.

The project area is not known for its visual resources. The proposed project would have a negligible impact on visual resources. Some vegetation would be removed. The fuel break would not be visible, except by the air. It would not, for example, mar the scenic beauty of a river canyon. 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

There would be no impacts to environmental resources, such as water, soils, and wildlife. There could be impacts to firefighting efforts. If a wildfire occurred, firefighters would not have this strategic fuel break to stop the advance of the fire and attack the fire. The result could be a larger wildfire that impacts environmental resources well beyond the project area. There may also be impacts to private property.

#### 4.3 Cumulative Impacts

The proposed action is expected to have beneficial cumulative impact on wildfire suppression in the area as long as BLM maintains the fuel break. Negative cumulative impacts are not anticipated. The proposed action would not impact significant biological and cultural resources. The proposed action would not impact water and soil resources. The proposed action would have negligible impacts on commonplace plants and wildlife.

#### 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* *10-26-10*

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NEPA coordinator/Archaeologist Date

*/s/ Brian Mulhollen* *10-26-10*

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Fuels specialist Date

*/s/ Jeff Horn* *10-26-10*

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Recreation Date

*/s/ Albert Franklin* *10-25-10*

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Botanist Date

*/s/ Peggy Cranston* *10-25-10*

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Wildlife specialist Date

### **5.3 Availability of Document and Comment Procedures**

This EA will be posted on Mother Lode Field Office's website ([www.ca.blm.gov/motherlode](http://www.ca.blm.gov/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](mailto:jjbarnes@blm.gov).