



United States Department of the Interior



BUREAU OF LAND MANAGEMENT

Mother Lode Field Office

5152 Hillside Circle

El Dorado Hills, CA 95762

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Merced River trails work and bear-resistant waste receptacle installation (CA-180-11-09) Finding of No Significant Impact March 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 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 impacts to a BLM sensitive species, Mariposa clarkia (*Clarkia biloba* ssp. *australis*), by trails maintenance and some new construction/trail improvement along the North Fork Merced River. Impacts to the limestone salamander would be avoided. Soils within the established BLM campgrounds would also be impacted during installation of the bear resistant trash receptacles. However, with the project design features, none of these impacts would be significant at the local or regional scale (cumulatively) because of the small scale of the proposed action.
- 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 the public safely access remote areas of the Merced River canyon and the North Fork Merced River canyon on foot.
- 3) *Unique characteristics of the geographic area.* The area affected by the proposed action has unique characteristics including outstanding scenery, free flowing values, geology, cultural resources, and special status species like the limestone salamander and Mariposa clarkia. These unique characteristics would be preserved. Impacts to the Mariposa clarkia would be kept to a minimum. Impacts to the limestone salamander would be avoided.
- 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.* The Mother Lode Field Office has done numerous trails maintenance and campground improvement projects in the past. These activities are nothing new to the field office and are 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 proposed action is relatively small in scale and 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. The limestone salamander is listed under the California ESA. Where encountered the species would be avoided. No impacts are anticipated.

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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5152 Hillside Circle
El Dorado Hills, CA 95672
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EA Number: CA-180-11-09

Proposed Action: Merced River trails work and bear-resistant waste receptacle installation

Location: T4S, R18E, Section 6;
T4S, R17E, Sections 1 and 2;
T3S, R17E, Sections 25, 35, and 36;
Mariposa County

1.0 Purpose and Need for Action

1.1 Need for Action

1.1.1 Trails maintenance and construction/realignment/improvement

The Merced River Special Recreation Management Area provides public access to BLM-administered campgrounds, trailheads, trails, swimming areas, and other recreational resources. The 2008 Telegraph Fire damaged and killed many trees and bushes along the existing trail system and has caused damage to trail segments. The trail system needs to be maintained in order for visitors to have a favorable and safe experience. This system is made up of various multi-use non-motorized trails, most of which are routed on the abandoned Yosemite Valley Railroad grade. Trail segments are in need of maintenance. Certain segments need work to clear sluffs, rockfall, overgrown vegetation, and tree falls following the Telegraph Fire. For years, visitors have been hiking up the North Fork Merced River (east side), starting from the abandoned Yosemite Valley Railroad grade near the North Fork's confluence. Due to the popularity of this area, an informal trail has developed here. A formally authorized trail that takes into account sensitive environmental resources and visitor safety is needed.

1.1.2 Bear-resistant waste receptacles

The existing waste receptacles (trash and recycling) in the campgrounds are not bear resistant. A small number of receptacles were ransacked by bears during the fall of 2010. Replacing the existing waste receptacles with bear resistant models would prevent this from occurring in the future.

1.2 Conformance with Applicable Land Use Plans

The proposed action is consistent with the Sierra Resource Management Plan (2008), pages 26-29. The proposed action is also consistent with the 1991 Merced Wild and Scenic River Plan and 1989 Management Plan for the Limestone Salamander ACEC. Under the Sierra RMP, management objectives for this area include providing for river oriented and land based recreation opportunities, protection of cultural resources, and management of the Merced River Wilderness Study Area (WSA). Maintaining, improving, and building non-motorized trails

would provide appropriate access to the Merced Wild and Scenic River corridor and the Merced River Wilderness Study Area. The proposed trails work and the installation of bear-resistant receptacles, as proposed in this EA, are consistent with the management goals for this area.

2.0 Proposed Action and Alternatives

2.1 Proposed Action

2.1.1 Trails maintenance and construction/realignment

The proposed action is to maintain and improve multi-use non-motorized trails listed below. Hand crews would use standard hand tools and power tools such as McLeods, pick maddock, shovels, and chainsaws to perform the grubbing, brushing, and rebuilding and, in some cases, building/improving trail segments. Tread width would be established at roughly 18 to 24 inches. Head clearance would be up to 10 feet high, and brush clearance would be opened up to provide a 6 foot wide passage.

The three sections of trail are as follows:

1. Merced River Trail along the railroad grade upstream from Briceburg (5 miles)
2. Merced River Trail downstream from the Railroad Flat campground to the North Fork (3 miles)
3. North Fork Merced River Trail (2 miles)

Section 1 (Railroad grade upstream from Briceburg): this section is in reasonably good shape. Some brush clearing is needed and many trees have fallen across the trail. Minimal tread work is needed. There is no proposal to construct bridges over any of the gulches.

Sections 2 (Railroad grade from Railroad Flat to the North Fork Merced): the first two miles of this trail are rocky and well defined. There is one very large rock blocking the trail here. A short detour would be constructed at this large fallen rock.

Section 3 (North Fork Merced): this is a popular informal trail that leads through a narrow gorge with a 20-foot waterfall. The 2008 Telegraph Fire started near here and has created much of the debris, which burdens this trail. There is substantial brush and vegetation that is growing, or has fallen on the trail. The initial section just above river level has already been established through informal use. We would clear this brush to the standard 6-foot width mentioned above. Tread would be maintained to 18-24 inches. The section of trail that makes the initial climb from the river and traverses the southwest facing hillside within the North Fork canyon needs to be built (in cases, this trail was constructed last year by the BLM-supervised hand crew). An 18-24 inch wide trail tread would be cut into the hillside with a grade no steeper than 20%. The overall elevation gain is approximately 100 feet. Therefore, the steep climbing portions would be very short. The new trail would tie into an existing informal trail defined, in part, by rock on the downhill side of the trail (probably a trail shown on the 1947 USGS 7.5' quadrangle). Trail work would be done for a two-mile stretch, from the North Fork confluence northward to a point. Work would not continue northward past this point. Additional work would need to be assessed and authorized in a separate NEPA document.

Camping would be provided for the crew at the BLM campgrounds along the Merced River. A secondary spike camp location would be located at the confluence of the Main Stem and North Fork Merced if it is determined to be necessary during the course of the project.

The ideal time to do the trail work is October through April. The weather conditions along the Merced River are more favorable for trail work at this time. Summer temperatures are routinely above 100 degrees. Winter rains moisten the soil making the trail construction easier. It would be much more feasible for BLM recreation staff to administer this project outside of the busy summer season.

2.1.2 Bear-resistant waste receptacles

Under the proposed action, the current containers would be replaced with approved bear-resistant waste receptacles. The installation would involve creating a concrete foundation and installing the model on it. There would be ten individual sites in the three campgrounds: four sites in McCabe Flat Campground, three sites in Willow Placer Campground, and three sites in Railroad Flat campground. No additional trash can locations are proposed. Approximate dimensions of each foundation would be 4 by 8 feet and 4 inches thick. (Actual dimensions would be determined by the model specifications of the final chosen units.) All installations would be made at existing waste container locations. The concrete pad would be constructed to the minimum recommended size for the purpose of anchoring the unit solidly to the ground. The installation of the foundation would cause some ground disturbance near the surface. The area has already been heavily disturbed by the construction and use of the campgrounds.

2.2 Project Design Features

- 1) Section 1 (upstream from Briceburg): this trail will require brush clearing and minimal work to clear rockfall, small sluffs, tree falls, and overgrown vegetation. Ground disturbance must be kept to a minimum.
- 2) Section 2 (Railroad Flat to the North Fork Merced River): the first three miles (to the North Fork confluence) are in good shape and will not require significant ground disturbance. One very large rock has fallen on the trail and will require a detour of approximately 20 feet. This detour will be constructed of rock that exists on site and must remain within the width of the abandoned Yosemite Valley Railroad grade.
- 3) Section 3 (North Fork Merced River Trail): work will occur along the same alignment as one of the existing “use paths.” This will further minimize the amount of new disturbed ground. The only area where the trail needs to be built/rebuilt is along a 620 ft section near the southern end where the trail traverses the southwest facing hillside. Beyond this section, only minimal ground disturbance will occur because the trail is somewhat established. Small sluffs and rock fall will need to be removed. Brush clearing and tree fall removal will also be necessary. Once work on the main trail alignment is completed, all of the user-created spurs will be rehabilitated to their natural state. This will focus all future use onto one sustainable, official trail.
 - i) No trails work causing ground disturbance will be done in the immediate vicinity of cultural resources. Refer to the cultural resources report (attached) for more detailed recommendations.

- ii) Impacts to limestone salamanders will be avoided. These small amphibians live under mossy rocks on shady slopes, and are active on the surface during the rainy season. All rock work within limestone salamander habitat or potential habitat will be done by hand, moving one rock at a time. In the event that a limestone salamander is uncovered during rock removal, the rock will be carefully placed back over the salamander so no harm occurs to the salamander, and rock removal activity within the immediate area (5 feet surrounding the rock) will cease, until the BLM wildlife biologist can assess the situation. This type of disturbance is minimally invasive and will be completed without harm to limestone salamanders or their habitat.
 - iii) A single elderberry bush was observed along the North Fork Merced segment (segment 3). Elderberry bushes are the host plant for the valley elderberry longhorn beetle, a species listed as threatened by the U.S. Fish and Wildlife Service under the Endangered Species Act. This particular shrub will not be impacted by the project. Should other elderberry shrubs be encountered during the project work, the shrubs must be avoided. Avoidance will be achieved through no ground disturbance within 100 feet of the drip line of any elderberry shrub.
- 4) Noxious weeds are known to thrive in disturbed soils. BLM has been very involved in fighting noxious weed in the project area for over a decade. Every effort would be made to avoid the spread of noxious weeds caused by our own projects. Tools would be cleaned prior to use on site. All of these trails are already monitored and treated for noxious weeds. This monitoring and treatment would continue. Early detection of new infestation is the most effective treatment.

2.3 No Action Alternative

Under this alternative, BLM would not perform the proposed trails work maintenance. No upgrade to the standard trash and recycling containers would be made.

2.4 Alternatives Considered but Eliminated from Detailed Analysis

None.

3.0 Affected Environment

The environmental setting is generally the “foothill” reaches of the Merced River canyon, in the central Sierra Nevada. BLM-administered land within this area is a popular recreation destination during the spring and summer. Wildflower enthusiasts, fishermen, and day hikers are the primary users. Its proximity to Yosemite National Park makes it an attractive alternative to the crowds of summer, while still being close enough for daily visits to the park. The area offers outstanding whitewater boating and wildflower viewing in the spring and excellent camping throughout the year.

The trail system is currently used by hikers, bikers, fishermen, boaters, and equestrian riders. The trails work and campground upgrade proposed in this EA will make their visit easier and safer. The trails are within the river corridor. The proposed trails lie partly or entirely within areas with special designations: the Merced Wild and Scenic River corridor, Merced Wilderness Study

Area, Merced River ACEC, and Limestone Salamander ACEC. The larger area has been designated as the Merced River Special Recreation Management Area, under the Sierra RMP.

The trails subject to work occur in a “Recreational” and “Wild” reach of the Merced Wild and Scenic River. The outstandingly remarkable values (ORVs) that made the river eligible for wild and scenic status are geology, rare plants, threatened and endangered species, recreation, and cultural resources.

Under the Sierra RMP, the project areas have been assigned a Class I Visual Resource Management (VRM) rating. The objective of VRM Class I is to preserve the existing character of the landscape. This class provides for natural ecological changes; however, it does not preclude very limited management activity. The level of change to the characteristic landscape should be very low and must not attract attention. At a minimum, all wilderness and wilderness study areas are in VRM Class I.

Section 1 (the historic railroad grade upstream from Briceburg) traverses the northern (river right) shore of the Merced River from Briceburg up to the USFS boundary at approximately 1250 feet of elevation. It is south facing and very sunny. This non-motorized multi-use trail runs along the Yosemite Valley Railroad grade built just after the turn of the century and abandoned during the mid-1940s. It is generally wide except for places where floods have washed away the railroad grade and a narrower trail bed has previously been established. Yellow starthistle and Italian thistle are known to occur along this section, especially closer to Briceburg.

Section 2 (the historic railroad grade downstream from Railroad Flat campground) to the confluence with the North Fork Merced River is likewise generally wide enough for a train. There are, however, several places where it has been washed out by flooding river waters. It is generally south facing, sunny and rocky with approximate elevation of 900 feet and decreasing. Yellow starthistle and Italian thistle are known to exist along this section. Noxious weed control efforts have been ongoing here since 2000.

Section 3 (the North Fork Merced River) is located on the east side of the North Fork of the Merced River at an elevation of approximately 950 feet. There are several informal user-created paths in this first section of the North Fork that all lead to the single informal trail (probably a pre-1947 trail) which traverses the canyon. At the southern end, near the North confluence, it has been several years since the original trail was established and natural sluffs have all but covered the original trail. In fact, it is unclear where the original trail was located. One user-created path stays low and then climbs very steeply to tie into the more established trail. One path follows the proposed alignment by gradually climbing up while traversing downstream. Other paths spring up each year someplace in-between. Yellow starthistle is not currently found along the North Fork Merced near its confluence with the main stem.

The initial section, where the informal trail needs to be realigned, is southwest facing and generally sunny. After a half mile or so the trail turns to the east and therefore the slope is north facing and shady. Vegetation is chamise and grey pine with a southern exposure. No unique soil formations exist in this project area. Although the Merced River canyon supports a number of

special status plant species, only the BLM sensitive species Mariposa clarkia (*Clarkia biloba australis*) occurs within this portion of the project area. This late blooming annual is, in fact, abundant throughout the whole Merced River corridor and it occurs in patches along all the trail sections discussed in this EA. Limestone salamander, a species listed as threatened by the state under the California Endangered Species Act, may also occur within the project area along the North Fork. Potential limestone salamander habitat occurs on shady, mossy, talus slopes. The salamander is active on the surface during the rainy season.

4.0 Environmental Effects

The following critical elements have been considered for this environmental assessment, and unless specifically mention later in this chapter, have been determined to be unaffected by the proposal: air quality, prime/unique farmlands, floodplains, wetlands and riparian zones, and environmental justice.

4.1 Impacts of the Proposed Action

This proposed action would occur within several areas with special designations (the boundaries overlap): the Merced Wild and Scenic River, Merced River Wilderness Study Area (WSA), and two BLM areas of critical environmental concern (ACEC) including the Limestone Salamander ACEC and Merced River ACEC. The proposed action would not negatively affect these areas or the values that led to their designation. The outstandingly remarkable values (ORVs) for which the Merced River was determined eligible to become wild and scenic. The project would not affect water quality or flows, geology, threatened and endangered species, or cultural resources. Much of the trail work proposed would occur on trails routed on the abandoned Yosemite Valley Railroad grade. This feature is one of the ORV cultural resources. It has been in use as part of the trail system for many years. The proposed trails work would not diminish this ORV in any way. The trails work would enhance the river's recreation ORV. The trail work would not impair the Merced River WSA's suitability to be designated a wilderness area in the future.

Trails subject to maintenance and improvement within the North Fork Merced River canyon exist within a unit of the Limestone Salamander ACEC. Hand crews would perform the proposed work. No heavy equipment would be used to the trails work. The vast majority of the trail tread for this project is already in place, created by people trying to access public lands within the canyon for decades. Therefore, the threat to limestone salamanders is extremely low. These small amphibians live under mossy rocks on shady slopes. All rock work required will be done by hand, moving one rock at a time. This type of disturbance is minimally invasive and can be completed without harm to limestone salamanders or their habitat.

The proposed action would have negligible (perhaps no) negative impacts on atmospheric, water, and soil resources. The project areas are located along major streams: the Merced River and the North Fork Merced River and some of their tributaries. However, the area that would be treated is very small in size. In most cases, the trail treads already exist—located on the abandoned Yosemite Valley Railroad grade or informally created foot trails. The bear-resistant receptacles would be placed within BLM's campgrounds which were built decades ago. Construction and maintenance work would be done by hand crews and would be done in a way that would not create future erosion problems.

BLM botanist Al Franklin (now retired) conducted a botanical study for the proposed North Fork Merced River trails work in 2008. Also, he has conducted botanical inventories in the past for the other projects areas/trail sections/the campgrounds. Franklin's 2008 study was specific to the North Fork trail alignment proposal discussed in this EA and was designed to help BLM meet its obligations under the Endangered Species Act and other relevant authorities. The current BLM botanist has reviewed his study and other relevant botanical information vis-à-vis the proposed action.

A BLM sensitive species, Mariposa clarkia (*Clarkia biloba australis*), occurs in varying densities along all three sections of the trails analyzed in this EA. Mariposa clarkia is an annual wildflower with a very limited distribution; the species is found almost exclusively in the Merced River drainage. It is often found in chaparral and foothill woodland habitat both on serpentinite soils which are uncommon and more common soil formations. It blooms in late spring and early summer (May-July) often prolifically in the Merced River canyon; annual variation in population size has been observed. Its limited range and threats from non-native plants and road maintenance led to its ranking by the California Native Plant Society as 1B.2 (Rare, threatened, or endangered in California and elsewhere). It is thought that the Mariposa clarkia's isolation in the Merced River drainage led to its speciation (Roberts and Lewis 1955).

A scientific literature search did not yield specific studies about Mariposa clarkia. Nevertheless, a 1955 study by Roberts and Lewis provides valuable information about *Clarkia biloba* and its rare, closely related taxon. *C. biloba* produces abundant seed, though the seeds have no special means of dissemination (other than gravity). Colonies may be composed of up to tens of thousands of individuals at densities of 10-100 adult plants per square yard (Roberts and Lewis 1955). Each mature individual may produce 10-20 capsules and around 50 seeds per capsule (Roberts and Lewis 1955). A *Clarkia springvillensis* seed bank study found approximately 223 seeds/m² within patches and 440 seeds/m² just after seed is dropped from flowers (McCue and Holtsford 1998). Seed dormancy and germination requirements specifically of Mariposa clarkia are unknown; however, studies of related taxons can provide insight. Experiments have suggested that *Clarkia* species persist a least few years in the soil after production, but probably less than eight years (McCue and Holtsford 1998).

The proposed trail work (brush clearing and limited tread work) in what is referred to as Section 1 and Section 2 in this EA would not be a detriment to the conservation of these annual wildflowers. Project work would be limited to October-April and would avoid the periods of flowering, pollination and seed set of Mariposa clarkia. Less than 0.5% of Mariposa clarkia habitat in the trail maintenance area would be impacted. Project work would take place mainly along established trails (on the historic railroad grade) and would have minimal soil disturbance beyond the trail tread. These trails are regularly patrolled for weed infestations, a major threat to the Mariposa clarkia.

The trail work proposed for the North Fork of the Merced River (referred to as Section 3 in this EA) would temporarily disturb a portion of a Mariposa clarkia population; however, the effects of the proposed action on Mariposa clarkia and its habitat as a whole in this area would be negligible. The colonies of Mariposa clarkia are of sufficient size that establishing an appropriate, sustainable tread of 18-24 inches is small when compared to the size of the

population as a whole in stretch of North Fork. A user-created trail already exists. This trail would be developed into a formal non-motorized trail; thus, the area is already disturbed. And Mariposa clarkia occurs along the user-created trail in this area. The linear nature of trail construction would minimize total soil disturbance and negative effects to the species. Tread width will be 18-24 inches with a few feet cut on the upslope and loose dirt cast over the down slope side. This may allow the Mariposa clarkia seed bank to travel intact to a location a few feet away. Mariposa clarkia is known to thrive in disturbed soils. Other user-created paths would be closed, rehabilitated and would allow that habitat to return to an untrampled state. Only a small area of Mariposa clarkia habitat is involved in the North Fork of Merced River trail construction/realignment, and it is likely that some of the newly disturbed ground would become new habitat (or return to habitat if it was habitat before the project). It has been observed in the field that clarkia plants on steep slopes above a trail sometimes germinate and establish on the soils disturbed by the trail work itself. Therefore, the effects of proposed action on Mariposa clarkia would be negligible.

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. She recommends that the proposed action would not affect threatened and endangered wildlife or other BLM special status wildlife. Of particular concern is the limestone salamander, which is listed under the California Endangered Species Act. Because the trails work is restricted to south-facing dry slopes that do not provide habitat for the limestone salamander, the BLM wildlife biologist has determined that the proposed action would not negatively affect this species or its habitat, including the Limestone Salamander ACEC. In addition, implementation of project design feature 3.ii would prevent take of limestone salamander. All rock work required would be done by hand, moving one rock at a time. In the unlikely event that a limestone salamander is uncovered during rock removal, the rock would be carefully placed back over the salamander so no harm occurs to the salamander, and rock removal activity within the immediate area (5 feet surrounding the rock) would cease, until the wildlife biologist can assess the situation. This type of disturbance is minimally invasive, and will be completed without harm to limestone salamanders or their habitat.

In addition to potential limestone salamander habitat, a single elderberry bush was observed along the North Fork Merced section (section 3). Elderberry bushes are the host plant for the valley elderberry longhorn beetle, a species listed as threatened by the U.S. Fish and Wildlife Service under the Endangered Species Act. This particular shrub would not be impacted by the project. No other elderberry shrubs were observed in the project area. However, project design feature 3.iii specifies that should any other elderberry bushes be encountered during project work, the shrubs will be avoided. Avoidance will be achieved through no ground disturbance within 100 feet of the drip line of any elderberry shrub. The proposed project would have no effect on valley elderberry long-horned beetle.

In 2008 the BLM archaeologist conducted a cultural resource study for the North Fork Merced River trail development project which is, in part, the proposed action described in this EA. In the past, the BLM archaeologist has conducted studies in the other areas of the Merced River canyon that are now the project areas for the proposed action discussed in this EA. His 2008 study was specific to the North Fork Merced project area and included a background records search, field

inventory, and Native American consultation. The study was designed to help BLM meet its obligations under Section 106 of the Historic Preservation Act and other authorities. The BLM archaeologist has reviewed his 2008 study vis-à-vis the proposed action, particularly the new trail construction along the North Fork Merced. He has also conducted additional field inventory. There are several cultural resources, mainly historic-era, in this area—some very close to where trail work would occur. The trail would be improved and aligned in a way that avoids direct impacts to the cultural resources along the North Fork Merced. Indirect impacts are possible from improved access to this area (which sometimes leads to looting and vandalism), but the informal trail has existed in this area for years and, in fact, is probably a historic-era trail. The Yosemite Valley Railroad grade has been determined not eligible of for the National Register of Historic Places. Regardless, the trail work would have very little impact on it. The railroad grade is considered a wild and scenic outstandingly remarkable value (ORV). The proposed work would not diminish the ORV. This ORV would not be negatively affected. The BLM archaeologist recommends that no significant cultural resources would be affected by the proposed action. No places of Native American religious and/or cultural significance would be affected (refer to the Section 106 compliance study/recommendations attached).

The proposed action is expected to have a beneficial impact on recreation. The potential displacement of recreation users (i.e., hikers, bikers and campers, etc.) during implementation is negligible. One of the features of proposed action is to do the trails work during the off-peak season when visitation is low. Regardless, the public would always be able to walk around any work site along the trail, or continue to use the campgrounds. In the long-run, low impact non-motorized access to BLM-administered lands within the Merced River canyon including the North Fork Merced, would be enhanced and made safer. Campground facilities would be improved by the placement of bear-resistant receptacles. These campgrounds are already developed and have been operating for over two decades.

The proposed action is consistent with the project areas' VRM Class I rating. The objective of this class is to preserve the existing character of the landscape. This class provides for natural ecological changes; however, it does not preclude very limited management activity. The level of change to the characteristic landscape should be very low and must not attract attention. The proposed trail maintenance/construction is relatively small, affecting mostly pre-existing informal trails, and would not affect the quality of visual resources within the Merced River canyon or the North Fork Merced River canyon. The bear-resistant receptacles would be installed in existing campground facilities. They would prevent bears from getting into trash receptacles which usually causes the trash to be strewn about—the potential for this definite eye soar would be reduced as a result of the new receptacles.

4.2 Impacts of the No Action Alternative

If the project were not conducted, there would be no impacts to special status species or the Merced Wild and Scenic River ORVs. The public would continue to use the proposed area on the existing use paths. Multiple trailing and erosion will continue to occur. Some members of the public will not be able to access the area because the condition of the trail is more difficult than their abilities. Bears will continue to be able to get into the trash. This will lead to a larger long-term problem if left unchecked.

4.3 Cumulative Impacts

Because there are no site-specific adverse impacts expected for environmental resources, no cumulative impacts are expected at a larger scale. Negligible impacts to the Mariposa clarkia are expected but not enough to cause cumulative impacts. No impacts to limestone salamander or valley elderberry longhorn beetle are anticipated.

5.0 Agencies and Persons Consulted

5.1 BLM Interdisciplinary Team

- David Greenwood, BLM outdoor recreation planner
- James Barnes, BLM archaeologist
- Lauren Fety, BLM biological technician
- Peggy Cranston, BLM wildlife biologist

5.2 BLM Interdisciplinary Team/Reviewers:

/s/ James Barnes *2/15/11*

NEPA coordinator/Archaeologist Date

/s/ Lauren Fety *2/15/11*

Botanist Date

/s/ Peggy Cranston *2/15/11*

Wildlife biologist Date

/s/ Jeff Horn *2/15/11*

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) 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 Hillsdale Circle, El Dorado, CA, 95762, or emailed to jjbarnes@blm.gov.

5.4 Literature Consulted

Hickman, JC, ed. 1993. *The Jepson Manual: Higher Plants of California*. University of California Press, Berkeley, CA.

McCue, KA and TP Holtsford. 1998. Seed bank influences on genetic diversity in the rare annual *Clarkia springvillensis* (Onograceae). *Am. J. of Botany* 85: 30-36.

Roberts, MR and H Lewis. 1955. Subspeciation in *Clarkia biloba*. *Evolution* 9:445-454.

Smith-Huerta, NL. 1984. Seed germination in related diploid and allotetraploid clarkia species. *Botanical Gazette*.145: 246-252.