



United States Department of the Interior



BUREAU OF LAND MANAGEMENT

Mother Lode Field Office
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El Dorado Hills, CA 95762
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Greenwood Creek trails realignment project (CA-180-10-19) Finding of No Significant Impact March-April 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/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 putting segments of existing trails to bed and building new ones, rerouted, to help preserve cultural resources. The trails would be put to bed and built using hand tools. There would be some ground disturbance associated with new trail construction. However, none of these impacts would be significant at the local level or cumulatively because of the extremely small scale of the project.

2) *The degree of the impact on public health or safety.* No aspects of the project 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 is within a proposed Wild and Scenic River corridor with unique characteristics. Two of the unique characteristics of this area are cultural resources and whitewater recreation. Both have been identified as outstandingly remarkable values (ORV) that help make the South Fork eligible to become a national Wild and Scenic River. The proposed action would potentially benefit the cultural resource ORV.

4) *The degree to which the effects on the quality of the human environment are likely to be highly controversial effects.* No anticipated effects have been identified that are scientifically controversial. As a factor for determining within the meaning of 40 C.F.R. § 1508.27(b)(4) whether or not to prepare a detailed environmental impact statement, "controversy" is not equated with "the existence of opposition to a use." *Northwest Environmental Defense Center v. Bonneville Power Administration*, 117 F.3d 1520, 1536 (9th Cir. 1997). "The term 'highly controversial' refers to instances in which 'a substantial dispute exists as to the size, nature, or effect of the major federal action rather than the mere existence of opposition to a use.'" *Hells Canyon Preservation Council v. Jacoby*, 9 F.Supp.2d 1216, 1242 (D. Or. 1998).

5) *The degree to which the possible effects on the human environment are likely to be highly uncertain or involve unique or unknown risks.* The analysis does not show that this action would involve any unique or unknown risks.

6) *The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.* Trails realignment 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 2008 Sierra Resource Management Plan and its associated environmental impact statement, as well as the 2004 South Fork American River Management Plan and its associated EA.

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. In fact, it would specifically help to preserve unevaluated archaeological sites.

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. If BLM biologists determine that an ESA listed species could be adversely affected, the BLM would either cancel the project or redesign to avoid adverse effects.

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

William S. Haigh
Field Manager, Mother Lode Field Office

Date



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EA Number: CA-180-10-19

Proposed Action: Greenwood Creek and Hastings Creek trails realignment project

Location: MDM, T 11 N, R 9 E, sections 10 and 11, El Dorado County, CA (please refer to the project area map attached)

1.0 Purpose of and Need for Action

1.1 Need for Action

A trail has been developed informally on BLM-administered land near Greenwood Creek. The trail was developed by the public looking for the shortest distance between two points. This trail has become a conduit for storm-water runoff. The trail is within a known archaeological site. Runoff during storm events, particularly late in the rainy season, is eroding the trail and the archaeological site. The trail needs to be put to bed and realigned to help protect the site. Another trail segment in the Hastings Creek area was routed too close to known archaeological sites. Again, the trail serves as a conduit for runoff during storm events. Artifacts are eroding out of the trail. The trail needs to be put to bed and realigned to prevent further erosion of artifacts and deterioration of the archaeological sites.

1.2 Conformance with Applicable Land Use Plans

The proposed action is consistent with the Sierra Resource Management Plan, approved in February 2008. Under this plan (page 17 of the Record of Decision), BLM has a goal of preserving significant cultural resources. The proposed action is also consistent with the South Fork American River Management Plan. Under this plan (page 29 of the plan), BLM decided to give management priority to protecting the natural and cultural values of the entire Greenwood Creek parcel while providing opportunities for high-quality outdoor recreation. Cultural sites were to be protected under this plan.

2.0 Proposed Action and Alternatives

2.1 Proposed Action

The proposed action is use a crew—perhaps a BLM-sponsored AmeriCorps Crew—to use hand tools to realign two trail segments on BLM-administered land in the Greenwood Creek and Hastings Creek area, along the South Fork of the American River (South Fork). The current trail segments, both negatively affecting archaeological sites, would be put to bed using hand tools and new trail segments would be built, also using hand tools, to prevent further affects to the sites. The trail segment to be built near Greenwood Creek is approximately 133 ft long. The trail

segment to be put to bed in this area is about the same length. The trail segment to be built near Hasting Creek is approximately 113 ft long. The trail to be put to bed is approximately 164 ft long. The new trails would have the same width and compacted dirt surfacing. If it is not possible to realign the trail in the Hastings Creek area, the BLM may consider simple drainage control features such as water bars to prevent further erosion.

The project areas are located within the proposed South Fork American Wild and Scenic River and the BLM's South Fork American River Special Recreation Management Area.

2.2 Project Design Features

The BLM would follow its policies and best management practices to build new trail segments and to put the old trail segments to bed. In each case, trail users would get a new trail alignment suitable for all of the uses allowed prior to the realignment, including horseback riding and mountain biking.

To avoid the introduction or reintroduction of noxious weeds, all equipment used to build trail and to put trail to bed would be cleaned prior to its arrival on public lands.

2.3 No Action

Under the no action alternative, the BLM would not put the current trail segments to bed and realign/build new trail segments. Trail use and erosion (caused by rainwater runoff) may lead to further deterioration of the affected archaeological sites. This action could be inconsistent with the BLM's goals of preserving cultural resource on BLM-administered land along the South Fork.

2.4 Alternatives Considered but Eliminated from Detailed Analysis

BLM did not consider any other alternatives in detailed analysis.

3.0 Affected Environment

The areas affected by the proposed action are located within the Greenwood Creek-Clark Mountain parcel, 362 acres of contiguous BLM-administered land encompassing nearly all of Section 10 and a portion of the west half of Section 11 (MDM, T 11 N, R 9 E). A detailed description of this parcel (including what are now the project areas) can be found in the South Fork American River Management Plan (and associated EA) and the notebook produced by BLM for public meetings regarding the plan (BLM 2000).

In brief, the parcel is nearly bisected by the South Fork of the American River—the dominant feature of the parcel. Clark Mountain is located on the south of the river. Land north of the river (referred to as the Straza piece) was acquired by BLM in 1997. Generally, this area contains portions of perennial Greenwood and Hastings creeks including their confluences and small seasonal tributaries. Both creeks were placer mined probably during the Gold Rush. The areas potentially affected by the proposed action are located in the vicinity of Greenwood and Hastings creeks.

A mosaic of vegetation types or alliances is found in the Greenwood/Hastings creek area. South-facing hill slopes on the north side of river are dominated by an interior live oak woodland with black oak, California buckeye, toyon, buckbrush, white leaf manzanita, keckiella, California

coffeeberry, poison oak, and pipe vine. A broad riparian habitat along the river includes sand bar willow, arroyo willow, shining willow, valley oak, Oregon ash, white alder, Fremont cottonwood, button willow, coyote bush, mock orange, California wild grape, deer grass, and scotch broom. Grasslands composed largely of non-native annual species dominate the relatively flat portions of the parcel, between the two creeks, along Highway 49.

Of note, recreational use of BLM-administered land in the Greenwood Creek/Hastings creek area is extremely high. This is among the most popular recreational areas managed by the BLM. The BLM has built trails, parking areas, and other visitor facilities to facilitate recreational use (hiking, nature viewing, horseback riding, mountain biking, waterwater rafting) in this area as well as adjacent BLM-administered land called the Cronan Ranch parcel. BLM trails link the two areas. The short trail segments subject to the proposed action analyzed in this EA are part of the network. The Greenwood Creek/Hastings Creek area is part of a BLM Special Recreation Management Area. Also, the BLM has recommended that the South Fork be incorporated into the national Wild and Scenic River system due, in part, to its outstandingly remarkable whitewater recreation and cultural resource values.

The BLM manages the Greenwood Creek/Hastings Creek area in accordance with class II visual resource management (VRM) standards. (Of note, there is a small area of BLM-administered land nearby within the Greenwood Creek-Clark Mountain parcel managed under class I standards.) The BLM's objective for class II is to retain the existing character of the landscape. The level of change to the characteristic landscape should be low. Management activities may be seen, but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape.

4.0 Environmental Effects

The following critical elements have been considered in this EA, 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, wilderness, and environmental justice.

4.1 Impacts of the Proposed Action

The proposed action would not affect atmospheric, water, or soil resources. The length of the trails to be realigned is relatively short—about 40 yards each. The affected soils are not unique or geologically significant. Rainwater runoff is causing erosion of sediment (including some archaeological sediment), but not enough to affect water quality in the South Fork (near Greenwood Creek) or in Hastings Creek. Trail realignment and construction would neither benefit nor degrade atmospheric, water, and soil resources.

The BLM botanist is going to analyze the impacts of the proposed action on botanical resources, especially special status plants. The analysis is designed to help BLM meet its obligations under the Endangered Species Act and meet other BLM policies. The botanist will recommend whether or not the proposed action would affect threatened and endangered plants or other BLM special status plants. To avoid negative impacts to special status plants, the BLM would either cancel the proposed trail work or redesign it. Also of concern is the spread of noxious weeds. The proposed

action would be implemented in a way that avoids the introduction or reintroduction of noxious weeds (please refer to design features 2.2).

Of note, the project area located near Greenwood Creek is within a broad riparian zone associated with the South Fork. The proposed action would not negatively impact this riparian zone.

The BLM wildlife biologist is going to analyze the impacts of the proposed action on wildlife, especially on special status wildlife. Her analysis will be designed to help BLM meet its obligations under the Endangered Species Act and meet other BLM policies. The biologist will recommend whether or not the proposed action would affect threatened and endangered wildlife or other BLM special status wildlife. To avoid negative impacts to special status wildlife, the BLM would either cancel the proposed trail work or redesign it.

The BLM archaeologist has begun a cultural resource study of the proposed action to determine whether significant cultural resources could be affected by the proposed action. The study is designed to help BLM meet its obligations under Section 106 of the Historic Preservation Act. A preliminary review by the BLM archaeologist found that no significant cultural resources would be affected by the proposed action. In fact, this action would help preserve known archaeological sites being eroded by the current trail alignments. The BLM archaeologist would be present during implementation to ensure that the known sites are not negatively affected. Putting the old trails to bed with hand tools would not negatively affect the archaeological sites. No places of traditional religious and cultural significance to Native Americans would be affected.

The proposed action could negatively impact recreational use very temporarily—perhaps a few hours at each project location—during project implementation. Trail use would resume, unaffected, upon completion of the realignment project. The trails would be realigned in accordance with BLM standards and best management practices. In each case, trail users would get a new trail alignment suitable for all of the uses allowed prior to the realignment, including horseback riding and mountain biking. The new segment near Greenwood Creek may be a longer but better alignment/grade for hiking, horseback riding, and mountain bike riding. There may be some temptation for trail users to “cut corners” and attempt to reestablish the old trail alignment because it is the shortest distance between two points. The new segment near Hastings Creek should be acceptable to all current trail users. The BLM would make every effort possible to create a trail alignment that is satisfying to all trail users. If this is not possible, the project would be canceled. The BLM may, alternatively, install simple water bars to control drainage. This would have no long-term effects on recreation.

The proposed action would not negatively impact visual resources. BLM manages the area in accordance with VRM class II 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.

The proposed action would not negatively impact any of the outstandingly remarkable values (ORVs) identified by BLM for the proposed South Fork American Wild and Scenic River. In fact, the proposed action would help to preserve cultural resources which are considered an ORV. The proposed action would help to protect the ORV.

4.2 Impacts of the No Action Alternative

Under the no action alternative, the trail segments would not be realigned. This alternative would not affect atmospheric, water, or soil resources. The current trail alignments are causing erosion during storm events and possibly by regular use under certain conditions. As mentioned above, however, there is not enough erosion to affect water quality in the South Fork (near Greenwood Creek) or in Hastings Creek. There would be no effect to special status botanical and wildlife resources. There would be no effect to recreation, visual resources, and recommended South Fork American Wild and Scenic River ORVs. The trail network would stay the same.

There would, however, be long-term negative effects to archaeological sites. Left unmanaged, the trail use and erosion (caused by rainwater runoff) would likely further erode the affected archaeological sites. This could compromise their scientific value (which is unevaluated). With artifacts visible in the trail tread, it exposes the sites to possibly looting and vandalism.

4.3 Cumulative Impacts

Negative cumulative impacts are not anticipated. The proposed action would not negatively impact recreation. The proposed action is, however, expected to have long-term beneficial cumulative impacts on the conservation of prehistoric and historic-era archaeological sites along the lower South Fork. In the last 20 years private lands in this area (which is much of the land) has seen explosive growth, and archaeological sites in this area have been increasingly threatened by residential development.

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

3-19-10

NEPA coordinator/Archaeologist	Date
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Botany	Date
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Wildlife	Date
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Recreation	Date
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5.3 Availability of Document and Comment Procedures

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

5.4 References Cited

Bureau of Land Management (BLM)

2000 South Fork of the American River Community-Based Planning Project Notebook. Bureau of Land Management-Folsom Field Office, Folsom, California. On file, at the BLM Mother Lode Field Office.