DRAFT FINDING OF NO SIGNIFICANT IMPACT
TUMBLEDOWN PROJECT

United States Department of Agriculture, Forest Service
Idaho Panhandle National Forests
Sandpoint Ranger District
Bonner County, Idaho

The Sandpoint Ranger District prepared an Environmental Assessment (EA) to identify and evaluate potential environmental effects associated with the proposed Tumbledown Hazardous Fuels Reduction Project. The EA was prepared in accordance with the National Environmental Policy Act, the Council of Environmental Quality Regulations for Implementing the Procedural Provisions of NEPA (CEQ Regulations, 40 CFR 1500-1508) and the Forest Service Handbook (FSH 1909.15_0-60) to determine whether or not any actions would have a significant effect on the quality of the human environment based on the context and intensity of its impact (FSH 1909.15_05 and 40 CFR 1508.27). The IPNF Forest Supervisor will make a decision regarding the Tumbledown Hazardous Fuels Reduction Project once the EA is reviewed by the public and comments are taken into consideration.

Findings

The following is a summary of the project analysis for significance, as defined by Forest Service Handbook 1909.15_05. "Significant" as used in NEPA requires consideration of both **context** and **intensity** of the expected project effects.

Context means that the significance of an action must be analyzed in several contexts (i.e. local regional, worldwide), and over short and long time frames. For site-specific actions significance usually depends upon the effects in the local rather than in the world as a whole.

The Tumbledown Hazardous Fuels Reduction EA is a project-level analysis. Its scope is confined to addressing the significant issues and environmental effects of the project, and the context of the proposal is limited to the locale of the project area. Project activities are limited to the specific fuel and vegetation treatments proposed on lands managed by the USDA Forest Service in the Tumbledown project area, although some analyses considered the extent of effects beyond the project boundaries.

Activities proposed in the Tumbledown Hazardous Fuels Reduction EA are of limited scope and duration, affecting only the immediate area in and around the proposed treatment units. Implementation would occur over a period of three to six years and would substantially improving hazardous fuels conditions and reducing potential wildfire intensities in the project area, while not causing any significant short- or long-term effects.

Design features included in the proposal would limit adverse effects to such an extent that any adverse impacts would be almost undetectable and immeasurable, even at the local level (EA, pages 21-51). There are no issues or unresolved conflict concerning alternative uses of available resources warranting consideration of additional alternatives (EA, pages 11-16).

Intensity refers to the severity of the expected project impacts. The following factors were considered to evaluate intensity.

1) **Impacts that may be both beneficial and adverse:** I considered beneficial and adverse impacts associated with the Proposed Action Alternative as presented in the Tumbledown Hazardous Fuels Reduction EA (pages 21-51). These impacts are within the range of effects identified in the IPNF Forest Plan. I conclude that the specific direct, indirect, and cumulative effects of the selected alternative are not significant, and this action does not rely on beneficial effects to balance adverse environmental effects.

No Effects

Project design and mitigation effectively eliminated or reduced to negligible most of the potential impacts, therefore, implementation of the proposed action would result in no effect to the following resources: cultural and heritage resources (EA, pages 50-51); old growth (EA, pages 37-38); Threatened, Endangered and Sensitive plant species (EA, page 41); stream channel conditions (EA, pages 26-28 and 32); peak flows (EA, page 28); water temperature (EA, page 32);flood plains, wetlands, municipal

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watersheds, impaired watersheds, steep slopes or highly erodible soils (EA, page 28); wetlands including riparian areas and floodplains (EA, page 26-30); bull trout (EA, page 33); fishery potential (EA, page 34); woodland caribou (EA, page 25); bald eagle (EA, page 25); grizzly bear (EA, page 25); Canada lynx (EA, page 25), black swift (EA, page 25); Coeur d'Alene salamander (EA, page 26); common loon (EA, page 26); harlequin duck (EA, page 25); northern bog lemming (EA, page 26); peregrine falcon (EA, page 26); Townsend's big-eared bat (EA, page 26); wolverine (EA, page 26); parklands (EA, page 21); prime farmlands (EA, page 21); and wild and scenic rivers (EA, page 21).

Beneficial Effects

The Tumbledown Hazardous Fuels Reduction EA documents the following beneficial effects of implementing the proposed action:

- Fire behavior under post treatment conditions would be much less intense and less resistant to control than the estimated fire behavior (EA, page 46). By reducing the potential for high intensity and fast moving crown fires fuel treatments would increase the chance of successful fire suppression and greatly lower the potential costs associated with large fires in the WUI (EA, page 46).
- Removal of shade tolerant species would reduce fuel ladders that currently provide pathways for fire to burn into tree crowns. Reduction of crown fire potential would facilitate reintroduction of historic fire régimes, a desired condition consistent with the purpose and need (EA, page 47).
- The percentage of ponderosa pine, western larch and western white pine-dominated stands would be increased as a result of both thinning favoring and planting of these species (EA, pages 36-37).
- Improvements proposed for the existing road network for this project would reduce the amount of road-derived fine sediment being delivered to Granite, Toms Gulch, Tumbledown, North Gold, Kickbush Gulch, Gold Creek and other project-area streams over the long-term (1-10 years). This would transpire into small-scale improvements in spawning areas (cleaner gravel), better insect production and prey availability for native trout, and less native fish avoidance of road-impacted reaches (EA, page 32).
- The proposed action would tend to reduce the appearance of artificial straight lines along the power line corridor. This would move the view towards its assigned VQO as well as that of a less altered but more open landscape (EA, pages 42-43).

Potential Adverse Effects

The Tumbledown Hazardous Fuels Reduction EA documents the following potential adverse effects from implementing the proposed action:

<u>Air Quality</u> (EA, page 47): The proposed action would have limited immediate adverse effect on air quality from proposed prescribed burning, and these effects would be localized and would last for a short duration. Proposed prescribed burning would be monitored and controlled by airshed regulations to avoid violation of air quality standards.

<u>Soil Productivity</u> (EA, pages 50-51): The proposed action would meet Region 1 soil recommendations and IPNF Forest Plan standards. Direct effects due to construction and recontouring of temporary roads are predicted, however, the total disturbance would be less than 15 percent in each activity area.

<u>Sensitive Wildlife Species</u> (EA, pages 22-27): The proposed activities may impact individual flamulated owls, black-backed woodpeckers, pygmy nuthatches, fringed myotis, western toads or their habitat; however only minor effects are expected and would not likely contribute to a trend towards federal listing or cause a loss of viability to the species or population.

<u>Management Indicator Wildlife Species</u> (EA, pages 22-27):The proposed activities may impact individual northern goshawks, pileated woodpeckers, white-tailed deer, forest landbirds, or their habitat; however only minor effects are expected and would not indicate a local or regional change in habitat quality or population status.

<u>Noxious Weeds</u> (EA, pages 38-39): Implementation of proposed activities would increase the risk of weed spread. Appropriate action would be taken if new populations of noxious weeds were discovered within the project area, and the proposed action would meet the intent stated in the Forest Plan for moderate weed control through the implementation of design features.

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Visual Quality (EA, pages 41-43): The proposed temporary road construction would be evident, but would have only a short-term effect on visual quality, given the landforms and the existing evidence of human activity on the landscape. Road cuts and fills would cause soil color contrast. Decommissioning these roads after use would help reduce the amount of time the color contrast remained on the landscape. The proposed action is consistent with management direction in the IPNF Forest Plan.

Fisheries (EA, pages 30-34): While improvements proposed for the existing road network for this project would reduce the amount of road-derived fine sediment being delivered to Granite, Toms Gulch, Tumbledown, North Gold, Kickbush Gulch, Gold Creek and other project-area streams over the long-term (1-10 years), some of the road improvement work, namely ditch improvements and addition of crushed rock over crossings and crossing approaches, associated with this project could potentially deliver some fine-sediment into streams (EA, page 32). This may indirectly affect native cutthroat trout by temporarily increasing sediment delivery into Tumbledown, Cedar, Canyon, N. & S. Twin, and North Gold Creeks. This effect would be a short-duration pulse of elevated turbidity, which could temporarily displace or cause physiological stress to individual fish within the immediate vicinity (100 m downstream).

2) The degree to which the proposed action affects public health or safety: The proposed fuel treatments are designed to increase the efficiency of fire suppression efforts and reduce risks to firefighters, local residents and the public, facilities and structures, water quality, and natural resources. There would be improved community safety because the fuel reduction would allow direct suppression tactics by firefighters, which would increase the chance of suppressing the fire before it reaches private structures. (EA pages 45-47 and 16). Conducting prescribed burning activities according to the Memorandum of Understanding established between the states of Idaho and Montana and burning only when weather and air conditions are favorable for smoke dispersal would protect air quality (EA, page 47) and public health.

3) Unique characteristics of the geographic area, such as proximity to historic or cultural resources, parklands, prime farms, wetlands, wild and scenic rivers or ecologically critical area*:* The proposed action would not impact any known cultural sites (EA, pages 50-51). Recognizing that the potential exists for unidentified sites to be encountered during project activity, a contract provision would be included allowing the Forest Service to unilaterally modify or cancel a contract to protect cultural resources regardless of when they are identified. The project area does not contain any parklands, prime farmlands, wild and scenic rivers or ecologically critical areas (EA, page 21). Wetlands in the project area were omitted from treatments and watercourses would be protected with RHCA buffers (EA, pages 27-28).

4) The degree to which the effects on the quality of the human environment are likely to be highly controversial: The effects of proposed activities on the quality of the human environment are not likely to be highly controversial. This is based on the limited context of the project, a review of public comments received to date, and the project's analysis. Effects analysis was conducted using peer-reviewed scientific literature (EA, page 21-51). Some opposition does exist, but the majority of the comments are in support of the proposed action (Project File, Public Involvement Section). No highly-controversial or significant issues related to the human environment were identified during previous scoping efforts (EA, pages 11-13). No significant issues were raised during the analysis process (EA, pages 11-13).

5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risk: Possible effects on the human environment that are uncertain or involve unique or unknown risks are minimal or non-existent based on a review of project analysis that employed scientifically accepted analytical techniques, available information, and best professional experience and judgment to estimate effects to the human environment. Proposed activities similar to the past fuel reduction projects conducted on many acres across the IPNF. These projects exhibited environmental effects similar to those predicted to occur with implementation of the Proposed Action including the desired changes in fire behavior and forest health that are the objectives of this project. Implementation monitoring of similar projects that have been implemented on the IPNF supports this conclusion (Forest Plan Monitoring Reports 1998-2007). The effects associated with the proposed action are recognized, familiar, and acceptable.

6) The degree to which the action may establish a precedent for future actions with significant effects or presents a decision in principle about future consideration: The proposed action is site-

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specific and would not set precedence for future actions or present a decision in principle about future considerations. This action does not represent a decision in principle about a future consideration. Any proposed future project must be evaluated on its own merits and effects. The proposed activities are in accordance with the best available science we have to manage fuels, fire behavior and forest health

7) Whether the action is related to other actions with individual insignificant but cumulative significant impacts: Based on the analysis and disclosure of effects in the EA (Pages 21-51), Appendix E, and the specialist reports, the proposed activities would not represent potential cumulative adverse impacts when considered in combination with other past actions or reasonably foreseeable future actions.

8) The degree to which the action may adversely affect districts, sites, highway structures, or objects listed in or eligible for listing in the National Register of Historic Places, or may cause loss or destruction of significant scientific, cultural, or historic resources: A comprehensive evaluation of heritage resources was conducted and there are no known sites that would be impacted. Potentially interested tribes were consulted with, and they expressed no concerns about the proposed activities. The proposed action would comply with the Natural Historic Preservation Act (EA, pages 50-51).

9) The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973: This project would not significantly adversely affect Threatened or Endangered species or their habitat. The project would have no effect on grizzly bear (EA, page 22), woodland caribou (EA, page 22), gray wolves (EA, page 22), or Canada lynx (EA, page 22). It would not jeopardize the continued existence of bull trout (EA, pages 33-34).

10) Whether the proposed action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment: Theproject meets federal, state, and local laws for air quality (EA, page 47), heritage resources or cultural sites (EA, pages 50-51), noxious weeds (EA, pages 38-39), water quality (EA, page 26-30), fisheries (EA, pages 30-34) and Threatened and Endangered species (EA, pages 21-26, 33, 40-41). It also meets National Environmental Policy Act disclosure requirements (Tumbledown Hazardous Fuels Reduction EA and this Draft Finding of No Significant Impact).

The proposed action is consistent with the NFMA and the Idaho Panhandle National Forests Forest Plan. All management activities would be in compliance with Management Area direction, including goals and objectives, as described for each resource in the EA (pages 21-51) and in accompanying specialist reports. This proposal does not require any Forest Plan amendments.

<u>16 USC 1604(g)(3)(E) National Forest System Land and Resource Management Plans</u>

(i) Timber harvest would not result in irreversible damage to soil, slope, or watershed conditions (EA, pages 26-30, 48-50).

(ii) Openings would be restocked within five years after harvest (EA, page 38).

(iii) The proposed harvests would not seriously or adversely affect water conditions or fish habitat (EA, pages 26-29, 30-34).

(iv) The proposed harvesting system is not selected primarily because it would give the greatest dollar return or the greatest unit output of timber (EA, pages 3, 7, 10, 17).

<u>16 USC 1604(g)(3)(F) National Forest System Land and Resource Management Plans</u>

(i) Clearcutting is not proposed (EA pages 16-18).

(ii) An interdisciplinary team reviewed and assessed the project (Tumbledown EA).

(iii) Harvest units would be shaped and blended to the extent practicable with the natural terrain (EA, pages 41-43).

(iv) Maximum size limits for areas to be cut in one harvest operation, would not be exceeded (EA, pages 16-18; Figure 2).

(v) The proposed harvests would be carried out in a manner consistent with the protection of soil, watershed, fish, wildlife, recreation, and esthetic resources, and the regeneration of the timber resource (EA, pages 21-51).

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