Finding of No Significant Impact
Paradigm Fuel Break Project
Environmental Assessment DOI-BLM-ID-B010-2011-0060-EA

I have reviewed the Council on Environmental Quality Regulations (CEQ) for significance (40 CFR 1508.27) and have determined the actions analyzed in DOI-BLM-ID-B010-2011-0060-EA (EA) would not constitute a major federal action that would significantly affect the quality of the human environment; therefore, an Environmental Impact Statement is not required. My determination was made by considering both the context and intensity of the potential effects, as described in the EA, using the following factors defining significance:

1) Impacts that may be both beneficial and adverse.

Potential direct, indirect, and cumulative impacts for wildfire management, general vegetation, special status plants, wildlife, special status animals, cultural resources, visual resources, soils, air quality, and livestock management were disclosed in the EA (Section 3.0). Stipulations, design features, and monitoring and control intended to mitigate impacts to the various resources and land uses were incorporated in the action alternatives (EA sections 2.3.2.2 and 2.3.2.3). The analysis indicated no significant impacts on society as a whole, the affected region, or the affected resources. While minimal adverse impacts to resources have been identified in the EA, the anticipated long-term benefits of a strategic fuel break system are numerous and discussed in the EA.

2) The degree to which the proposed action affects public health or safety.

The EA analyzed general impacts to public health and safety in EA Section 3.8 (Air Quality). If prescribed burning is used for seed bed preparation, impacts to air quality would be minimal and short-term and there would be no cumulative impact, overall. Burning within prescription and participation in the Montana Idaho Airshed Group Prescribed Fire Program would keep airshed emission levels within the Idaho Department of Environmental Quality's air quality standards. The likelihood of smoke being present for periods longer than two to three ours is negligible due to the type of fuels being targeted and by burning within prescription.

3) Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands. wetlands, wild and scenic rivers, or ecologically critical areas.

The historic and cultural resources of the area of potential effect have been reviewed by BLM. The potential impacts will be mitigated with design features and stipulations (EA sections 2.3.2.2). Additional cultural resource surveys would be required along the power line and additional fuel breaks added late in the planning process if Alternatives 2 or 3 are selected. For all action alternatives, additional cultural surveys may be required where the Oregon National Historic Trail is within the Area of Potential Effect or within 0.25

mile, to determine the exact location of the trail and if there is trail braiding. Any and all actions within archeological sites must be pre-approved by consultation with the Idaho State Historic Preservation Office (SHPO).

There are no impacts to wetlands identified in the EA (wetlands mapped in the project area are minimal). Avoidance of wetlands is identified as a design feature and would limit or eliminate impacts if a wetland is encountered (EA Section 2.3.2.2). There are no park lands, prime farmlands, wilderness, Wild and Scenic Rivers, or ecologically critical areas.

4) *The degree to which the effects on the quality of the human environment are likely to be highly controversial*.

Seeding of prostrate kochia is the primary method identified for establishing fuel breaks (greenstrips) in the Paradigm Project area. There is concern about its potential to spread beyond its treatment footprint, particularly into slickspot peppergrass habitat (slickspot peppergrass is a proposed for federal protection under the Endangered Species Act).

Prostrate kochia has been used widely across the West, including within and adjacent to the Paradigm Project area. The EA presents numerous studies showing no movement to minimal movement of prostrate kochia beyond original treatment boundaries (EA Section 3.2.2), and provides thorough analysis and impacts of utilizing prostrate kochia in slickspot peppergrass habitat (EA Sections 3.3.2). Project design features and a robust fuel break monitoring and control strategy specific to prostrate kochia were developed to restrict or eliminate possible impacts to slickspot peppergrass (EA sections 2.3.2.2 and 2.3.2.3).

5) *The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.*

Fuel break development is a relatively common practice. The BLM and other entities (e.g., Idaho Department of Transportation) use and maintain fuel breaks (both vegetated and not) to help control fire and minimize impacts of fire to the human environment and to the natural environment. The EA describes potential impacts from fuel break development and maintenance as well as design features and stipulations created to minimize or eliminate impacts (EA Section 3.0). No effects on the human environment are considered to be highly uncertain or involve 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*.

BLM's fire protection priorities are (1) human life, (2) property, and (3) natural/cultural resources. Fuel breaks have been developed on the Boise District using similar methods as the proposed action with similar objectives and effects. Although this project is proposed on a larger scale than previous projects of this nature, it would not establish a precedent for future actions with significant effects or represent a decision principle.

7) *Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.*

Actions analyzed for cumulative effects included other fuel break development, construction of energy infrastructure, recreation, noxious weed treatment, livestock grazing and trailing, and wildfire. Fuel break development, as described in the action alternatives, alone or cumulatively with these activities would not produce significant impacts (EA sections 3.1.3, 3.2.3, 3.3.3, 3.4.3, 3.5.3, 3.6.3, 3.7.3, 3.8.3, and 3.9.2). Adverse, site specific impacts to vegetation and soils (habitat), slickspot peppergrass, and wildlife by this project and cumulatively with other actions were identified in the EA, but were not deemed significant. Project design features plus the benefits of a strategic fuel break system would offset these impacts by protecting resources from future wildfires; maintaining intact habitat and promoting improvement of degraded habitat over the long term.

8) *The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places (NRHP) or may cause loss or destruction of significant scientific, cultural, or historical resources.*

Acceptable treatment types within archeological sites would be determined on a site by site basis in consultation with the Idaho State Historical Preservation Office (SHPO). In all cases no heavy ground disturbing activities will be allowed within any site or within the Oregon National Historic Trail corridor. Methods of fuel break development would be decided on a site by site basis and include complete avoidance of a site to activities with minimal ground disturbance that would not affect the site's NRHP qualities. Avoidance and mitigation would protect these sites ensuring adverse impacts to cultural resources is minimal at most.

9) *The degree to which the action may adversely affect an endangered or threatened species or its habitat that has determined to be critical under the Endangered Species Act of 1973.*

The BLM consulted with the US Fish and Wildlife Service (USFWS) regarding the potential impacts to slickspot peppergrass (proposed for federal protection) per Section 7 of the Endangered Species Act. Adverse impacts to slickspot peppergrass by fuel break development were identified in the EA via disturbance to occupied habitat, critical habitat, and habitat within the proposed fuel break footprint, but were not deemed significant. Project design features, namely avoidance and treatment buffers, consistent with the 2014 Conservation Agreement would minimize disturbance; and the benefits of a strategic fuel break system would outweigh these impacts by providing long-term protection to from future wildfires. The USFWS Conference Opinion concludes that the Paradigm Project will not jeopardize the survival and recovery of slickspot peppergrass and will not destroy or adversely modify proposed critical habitat.

10) Whether the action threatens a violation of Federal, State, and local laws or requirements imposed for protection of the environment.

The fuel break development alternatives comply with all known federal, state, local or tribal law and requirements imposed for the protection of the environment and are consistent with applicable land management plan, policies, and programs (EA sections 1.3 and 1.4). State, local, and tribal interests were given the opportunity to participate in the environmental analysis process during scoping and comment periods and via consultation.

/s/ *Tate Fischer* **04/24/2015**

Tate Fischer
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Date