



EVALUATION AND ADOPTION OF OTHER FEDERAL AGENCY PREPARED ENVIRONMENTAL ASSESSMENT

DRAFT FINDING OF NO SIGNIFICANT IMPACT

Lower Basin Hazardous Fuels Reduction Intersection Project

**U.S Bureau of Land Management
Benton County, Washington**

February 2025

The U.S Army Corps of Engineers, Walla Walla District (USACE), intends to issue the Bureau of Land Management (BLM) a perpetual permit, authorizing the BLM to conduct fuels reduction activities on USACE managed federal lands at the McNary Lock and Dam Project, Benton County, WA. The BLM's proposed action aims to proactively manage and prevent the increasing frequency and severity of wildfires in two separate wildland-urban interface (WUI) areas within Benton County. The two WUI's would include the Horse Heaven Hills area (located just south of, and adjacent to Benton City) and the McNary Units (located just north of, and upstream of McNary Lock & Dam).

The proposed project includes approximately 1,155 acres of BLM-administered land, 112 acres of USACE land, 21 acres of private property, and 11 acres owned by the Kennewick Irrigation District, totaling about 1,289 acres. The BLM's proposed action would. Prior to implementation, a comprehensive burn plan would be developed in close collaboration with USACE, Operations Division, to ensure the prescribed burning activities meet public safety requirements and complies with Appendix R of the Project Operations Engineering Pamphlet (EP) 1130-2-540 titled *Environmental Stewardship and Maintenance Guidance Procedures* (Attachment C). The Appendix R outlines the specific guidance for prescribed fire plans and preparation.

Initial public scoping for the project occurred from September 29, 2023, through October 13, 2023, during which time the BLM encouraged the public and stakeholders to provide input on the project proposal. Stakeholders included individuals that live on the borders of the project area, to include businesses and private landowners. These stake holders were notified via letter, and comments were received through the BLM's ePlanning website. The BLM received a total of 6 comments from the public (outlined within Appendix A of the EA). Comments identified concerns with potential effects to native plants and rare species, wildlife forage, fuel break locations, invasive species control, recreation enforcement, endangered species protection, and the use of targeted grazing.

Public and stakeholder comments received during the scoping period were addressed within the draft *U.S. Department of Interior Bureau of Land Management Lower Basin*



Hazardous Fuels Reduction Environmental Assessment (EA) (Attachment A). The EA presented an analysis of the potential environmental impacts associated with the BLM's proposed action, to include lands owned and managed by USACE. In addition, the draft BLM EA encompasses supplemental analysis to meet USACE's requirements for socioeconomic, wildlife corridors and connectivity, and air quality and emissions. The BLM's draft EA and Finding of No Significant Impact (FONSI) were posted to their National Environmental Policy Act (NEPA) ePlanning website on September 29, 2024, for a 15-day review and comment period. During this period, the BLM received one comment in favor of the project. The BLM EA and FONSI was finalized on November 27, 2024.

In accordance with the Council on Environmental Quality (CEQ) Guidelines 40 Code of Federal Regulations (CFR) 1506.3, USACE is authorized to adopt another federal agency's EA, if the information contained therein is accurate, and adequately addresses the proposed action's environmental impacts and complies with the NEPA regulations. USACE hereby adopts BLM's EA and any relevant supporting documentations referenced or attached therein, in its entirety (Attachment A), except as otherwise modified or supplemented below.

The EA evaluated a total of 3 alternatives, however, only one alternative was determined to meet the BLM's purpose and need, goals and objectives (alternative 2 proposed action). The only difference between the proposed action alternative and alternative 3 in BLM's EA was the inclusion of targeted grazing, which USACE views as a simple variation of the proposed action alternative. The No Action and the proposed action alternatives were considered for environmental analysis by USACE and are outlined in Table 1 below:

Table 1: Alternatives evaluated, with design features included.

	Prescribed Fire	Herbicide	Native Seeding	Adaptive Management	Targeted Grazing
Alternative 1 (no action)	No prescribed burning would occur. Wildfires would continue under current conditions.	No planned Treatments. Non-native and invasive species would persist under current conditions	No native seeding would occur, native plant species would rely on natural regeneration to reestablish following disturbances	No adaptive management strategies would occur, natural processes would continue under current conditions	No targeted grazing would occur, Wildfires would continue under current conditions
Alternative 2 (proposed action)	Prescribed fire would be utilized to reduce fine fuel loadings and break up	Herbicide treatments would be utilized to combat nonnative and	Native seeding would occur to reestablish areas with low quantities of native species	Adaptive management would be utilized to manipulate implementation strategies to achieve optimal results as	No targeted grazing would occur.



	continuous fuel beds to slow or stop the progress of wildfires	invasive species that can contribute to increased fuel loadings	and naturally combat nonnative and invasive species	conditions change over time	
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Alternative 2 would include the use of adaptive vegetation management through prescribed burning, herbicide application, native plant seeding and is broken down into individual project elements and outlined in greater detail below:

Alternative 2: Proposed Action

Prescribed Burning

Prescribed fire treatments would be applied to fuel breaks where fuel loads exceed 1.10 tons per acre, based on the GR2 fuel model. Burns would take place between October 15 and March 15 under controlled environmental conditions to consume fine fuels (less than 0.25-inch diameter) while protecting the roots of native vegetation. Each burn would be followed by a minimum two-year rest period. After this period, fine fuel loads would be monitored, and treatments would resume if fuel levels exceed 1.10 tons per acre. The objectives are to reduce fuel loads, lower fuel heights, and break up continuous fuel beds by creating a mosaic burn pattern with low-intensity, short-duration fires. Burn plans would comply with BLM standards and follow the guidelines in the Interagency Prescribed Fire Planning and Implementation Procedures Guide (NWCG 2022).

Fireline construction would involve creating up to 41,448 feet of new handlines, primarily in the Horse Heaven Hills and McNary areas. These handlines would clear vegetation down to bare mineral soil and be up to 36 inches wide. Berms, which are raised barriers, would be extended outward from the handlines to help contain fires. In critical areas, a 100-foot-wide fuel modification zone might be established to provide additional containment. Additionally, existing features such as roads and trails could be improved to serve as containment lines. These construction activities would be repeated as necessary using an adaptive management approach, ensuring that the firelines remain effective over time within the same locations.

Herbicide Treatments

Herbicide treatments would target cheatgrass, diffuse knapweed, and other noxious weeds in designated areas. Imazapic would be applied in areas with 10% or greater cheatgrass cover at rates of 2-12 fluid ounce per acre, primarily using aerial broadcast or backpack applications to minimize ground disturbance, except in flatter terrain where ground vehicles may be used. Treatments for cheatgrass would be pre-emergent or early post-emergent, typically in fall or winter. In McNary fuel breaks, clopyralid (0.6-



1.33 pints per acre) or aminopyralid (5-7 ounce per acre) would control diffuse knapweed in spring (rosette to early bolt stage) or fall (rosette stage).

Herbicides would be applied via aerial broadcast, ground vehicles, or hand application depending on terrain. Spot applications or small-scale broadcasts would address other invasive species as needed during the project. All applications would adhere to product labels, design features, and *Spokane District Programmatic Noxious Weed and Invasive Plant Management (NIMP) EA* standard operating procedures to ensure environmental compliance and effectiveness. The aim is to reduce invasive plant cover and support the project's long-term vegetation management goals.

Native Seeding

Seeding would be conducted in areas with bare ground or low abundance of perennial grasses to stabilize soil and reduce the risk of weed invasion. Fuel breaks with less than 25% native bunchgrass canopy cover or fewer than 0.8 desirable species per square foot would be prioritized. Seeding would occur in fall or winter, using aerial broadcast for steep and rugged terrain. In flat or rolling areas, a rangeland drill or Utility Terrain Vehicle broadcaster may be combined with harrowing or rolling to incorporate seed into the topsoil. Handlines would be seeded using hand broadcast and raking.

Seed would be applied at 20-25 pounds per acre, and seed mixes tailored to the area would be used. For the McNary Units, the seed mix includes:

- **Indian ricegrass** (*Achnatherum hymenoides*): 30%
- **Needle and thread** (*Hesperostipa comata*): 30%
- **Sandberg bluegrass** (*Poa secunda*): 20%
- **Sand dropseed** (*Sporobolus cryptandrus*): 15%
- **Native forbs**: 5%.

In the Horse Heaven Hills, source-identified biotypes would be preferred to preserve important botanical resources. The approach ensures soil stabilization, minimizes erosion, and promotes the re-establishment of native plant communities.

Adaptive Management

A combination of Assessment, Inventory, and Monitoring (AIM) plot data and fuel loading calculations would determine fire return intervals for fuel breaks. AIM plots would monitor soil and vegetation characteristics, and field personnel would assess burn severity, soil hydrophobicity, herbicide effectiveness, and planting success. This data would establish fuel thresholds for additional prescribed fire treatments. Monitoring invasive grasses and non-native species would guide herbicide use and native seeding needs. Long-term monitoring would rely on AIM plots located near the center of each polygon, consisting of three 25-meter transects radiating from a central point. A soil pit, measuring 50 centimeters in diameter and 70 centimeters deep, would be dug near the



plot center. Combined monitoring efforts would ensure adaptive management and effective treatment strategies.

The EA evaluated the potential effects of the no action alternative, which is required by NEPA to be used as a baseline from which to compare all other alternatives, and the proposed action alternative on the environmental resources shown in Table 2.

Table 2. Summary of Potential Effects of Proposed Action Alternative

Issues Considered	Insignificant effects	Significant Effects	Resource unaffected by action
Fire Behavior	X	-	-
Public Safety (Herbicide Treatments)	X	-	-
Native Plant Communities, Noxious and Invasive Weeds, Biotic Soil Crust, and Rare Plants	X	-	-
Grazing Authorizations	X	-	-
Recreation	X	-	-
Visual Resource Management	X	-	-
Cultural Resources and Historic Places on the National Register	X	-	-
Fossil Localities	X	-	-
Soil Resources	X	-	-
Minority/ Low-Income Populations/ Communities	X	-	-

The BLM's proposed action would have insignificant effects to all the resources described in the above Table 2. For more detailed information concerning the effects analysis for those resources can be found in Section 3 of BLM's EA.

Issues considered but not analyzed in detail are included within the Table 3 below:

Table 3. Issues considered but not analyzed further.

Issue Considered	Explanation
Wildlife Species and Migratory Birds of Conservation Concern (BCC)	The project avoids sensitive periods for wildlife and uses design features to mitigate short-term disturbances, ensuring long-term habitat benefits. Herbicides are low-toxicity, and timing restrictions prevent impacts to sensitive species and migratory birds.



Wildlife Corridors and Connectivity	The project avoids creating permanent barriers to wildlife movement and uses temporary or virtual fencing for targeted grazing. Short-term impacts from prescribed burns are mitigated by quick vegetation recovery, while shrub-steppe habitats are preserved as wildlife corridors long-term.
Air Quality and Emissions	The proposed treatments have the potential to temporarily impact air quality, however, these impacts would not result in significant long-term impacts to climate change and greenhouse gas emissions. Prescribed fire treatment emissions are significantly lower than those of unplanned wildfires. Regulatory measures and approvals ensure compliance, and the project aims to reduce fire size and intensity, ultimately benefiting air quality and reducing long-term GHG emissions.

For more information concerning these issues not analyzed, refer to Section 3.11 of the BLM's EA. Below outlines how the BLM's proposed action complies with relevant federal environmental laws and regulations.

The Endangered Species Act (ESA) requires federal agencies to consider the conservation needs of threatened and endangered species in all their actions and to consult with the U.S Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS), together, the Services, on the impacts of these federal actions. The BLM generated a USFWS Information for Planning and Consultation (IPaC) report for the project areas. The IPaC identified the following species as potentially occurring in the project area: Gray Wolf (*Canis lupus*), Yellow-billed Cuckoo (*Coccyzus americanus*), and Bull Trout (*Salvelinus confluentus*). Due to the proximity to the Columbia River, specifically within the McNary units which are within 300 ft of the ordinary high-water mark, ESA-listed salmonids should be considered. The species and sub-populations potentially impacted would include: Snake River Sockeye (*Oncorhynchus nerka*), Snake River Fall Chinook (*Oncorhynchus tshawytscha*), Snake River Spring/ Summer Chinook (*Oncorhynchus tshawytscha*), Snake River Steelhead (*Oncorhynchus mykiss*), Upper Columbia River Spring Chinook (*Oncorhynchus tshawytscha*), Upper Columbia River Spring Chinook (*Oncorhynchus tshawytscha*), Upper Columbia River Steelhead (*Oncorhynchus mykiss*), and Middle Columbia River Steelhead (*Oncorhynchus mykiss*).

The BLM determined in their analysis that there would be "No Effect" to the following species as they would not exist in the project areas for the following reasons:

- Gray Wolf (*Canis lupus*): There are no records of wolf packs in the Lower Basin and the high levels of anthropogenic activities in the area would preclude use of the project area by wolves. Furthermore, there is no critical habitat designated for this species within the project areas.
- Yellow-billed Cuckoo (*Coccyzus americanus*): This species is considered functionally extirpated by Washington Department of Fish and Game (WDFW),



with sightings in the State being only of non-breeding vagrants. Furthermore, there is not critical habitat designated for this species in the project areas.

The BLM acknowledges that bull trout and the above listed salmonid species (and sub-populations) exist within the Columbia River and its tributaries, but has determined that that the proposed action would have “no effect” to the species and critical habitat for the following reasons:

- **Bull Trout and Salmonids:** These species occupy the Columbia River and its tributaries either for over wintering or as a migratory corridor. Any potential effects to these species or their designated critical habitats resulting from activities proposed by BLM and authorized by USACE’s issuance of a perpetual permit have been consulted on previously within the BLM’s NIMP EA. Proposed activities would include project design features captured within the Spokane NIMP EA and the associated Aquatic Restoration Biological Opinion (ARBO II). Those design features are outlined within Appendix D of the EA. Furthermore, coordination with USACE Operations Division would ensure that any application of herbicide on USACE managed lands would be consistent with USACE’s Integrated Pest Management Program (IPMP) or Aquatic Pest Management Program (APMP). These programs have completed consultation and coordination with the USFWS and NMFS, with the intention of protecting aquatic ESA-listed species. Other components of the proposed action (prescribed burning, natural plantings, and fuel break construction) would occur greater than 300 feet from the river’s ordinary high-water mark, and therefore would also have “no effect” on these species or critical habitat.

USACE has generated its own USFWS IPaC Report (Attachment B) for the project areas and concluded supplemental analysis was required for two additional terrestrial ESA species. It was determined that the Proposed Action would have “No Effect” to these species for the following reasons:

- **Monarch Butterfly:** This species relies on specific habitats for breeding, foraging, and migration. Their primary habitat requirements include open areas with abundant milkweed species (*Asclepias* spp.) for larval development, as milkweed is the sole host plant for monarch caterpillars. Adult monarchs require diverse nectar sources from native flowering plants to sustain energy, particularly during their fall migration south to overwintering sites in central Mexico. Key nectar plants in the region include species like showy milkweed (*Asclepias speciosa*), goldenrod (*Solidago* spp.), and asters (*Symphyotrichum* spp.). While these habitat conditions may be present within the action area and this species is known to migrate through the area, the implementation of proposed fuels reduction activities would occur during periods when this species would not be present within the area. Therefore, USACE biologists have determined that the proposed action would have “No Effect” to this species. Furthermore, proposed critical habitat is isolated to



overwintering grounds in California, and thus, there would be “No Effect” to critical habitat.

- Suckley’s Cuckoo Bumble Bee: This species relies on healthy populations of host bumble bee species, particularly *Bombus occidentalis* (the western bumble bee), for its survival. As an obligate social parasite, *B. suckleyi* does not establish its own colonies but infiltrates the nests of host species to lay its eggs. Habitat requirements include diverse, flower-rich environments that support both the cuckoo bumble bee and its hosts, with access to abundant nectar and pollen sources from native flowering plants and undisturbed areas suitable for nesting and overwintering. These resources are not present within the action area and therefore would have “No Effect” to this species. The timing of proposed fuel reduction activities would occur during periods of hibernation, known as diapause, during the early fall and winter months. Furthermore, there is currently no critical habitat designated for this species.

USACE biologists have determined the proposed action would have “No Effect” to the above species and concurs with the determinations made within the BLM’s analysis. No further consultation is required.

The NHPA requires federal agencies to consider the effects of their actions on historic properties and to take measures to avoid or minimize adverse effects to these culturally significant resources. This would apply to properties that are listed, or are eligible for listing, on the National Register for Historic Places (NRHP). In order to meet its obligations under Section 106 of the National Historic Preservation Act of 1966 [as amended] (NHPA) and agency-specific consultation policies, the BLM has formally consulted (as the lead federal agency) with the Washington State Department of Archaeology and Historic Preservation, the Confederated Tribes of the Umatilla Indian Reservation, the Confederated Tribes and Bands of the Yakama Nation, the Confederated Tribes of the Warm Springs, and the Wanapum Band of Indians on the area of potential effects (APE) for the range of actions proposed on January 24, 2024. Findings of effects determinations would be consulted on with these same parties on a case-by-case basis and prior to the implementation of any proposed action with the potential to adversely affect cultural resources.

Section 404 of the Clean Water Act (CWA) established a program to regulate the discharge of dredged or fill material into waters of the United States (WOTUS) and Section 401 requires that any federal activity that may result in a discharge to WOTUS must first receive a water quality certification from the appropriate state certifying. The proposed action would not trigger Section 404 as the action would not result in discharges of dredged or fill material into the Columbia River, the nearest WOTUS.

Section 402 of the CWA establishes the framework for the National Pollutant Discharge Elimination System. This section regulates the discharge of pollutants into WOTUS. The section is triggered if an action results in greater than one acre of ground disturbance



and has the potential for stormwater runoff into WOTUS, or an action results in the discharge (point or non-point source) into WOTUS. The proposed action has the potential for the disturbance of greater than one acre, through handline construction (~41,448 feet), however, these activities would not be localized to any area that has the potential for stormwater discharge into WOTUS. Furthermore, the proposed action would not result in any point or non-point source discharges of pollutants into WOTUS. Therefore, the proposed action would not trigger the Section 402 of the CWA.

USACE has determined that the BLM Final EA provides sufficient evidence and analysis to meet the requirements pursuant to NEPA, except as supplemented or explained above. This FONSI, along with the BLM's Final EA and all other supporting documentation, was released for a 15-day public comment and review starting on February 28, 2025. Any comments received would be addressed in an attachment to the finalized USACE FONSI document.

I have taken into consideration the technical aspects of the BLM's proposed Fuels Reduction Project within the Lower Columbia Basin, the best scientific information available, and the analysis and content within the BLM produced EA, as supplemented to meet USACES analysis requirements. Based on this information, I have determined that implementation of the BLM's proposed action, and USACE's authorization to implement these activities on USACE property, would not significantly affect the quality of the human environment, and therefore an Environmental Impact Statement is not required. USACE would proceed with issuing the BLM a perpetual permit, authorizing the BLM to conduct fuels reduction activities on USACE property, in a timely manner and as time and resources permit.

KATIE WERBACK

Lieutenant Colonel, EN
Commanding

Date



Attachment A: Lower Basin Hazardous Fuels Reduction Environmental Assessment, Bureau of Land Management Spokane Border Field Office, dated August 2024.

Attachment B: U.S Fish and Wildlife Information for Planning and Consultation (IPaC) report, dated January 30, 2025.

Attachment C: Appendix "R" Prescribed Fire Plan dated July 31, 2005.

DRAFT