

DECISION NOTICE
AND FINDING of NO SIGNIFICANT IMPACT

ALLISON GUARD STATION IMPROVEMENT PROJECT

Harney County, OR
Township 19 South, Range 26 E, Section 15, SW Quarter Section

Malheur National Forest
431 Patterson Bridge Road
P.O. Box 909
John Day, OR 97845

Decision and Reasons for the Decision

I have decided to implement the proposed action for this project. This proposal includes the following actions: 1) convert an existing warehouse/bunkhouse into more bunkhouse space, 2) reconstruct building foundations that are deteriorating, 3) construct a new vehicle storage shed in a manner that is consistent with the site's historic character, 4) remove or modify the generator building and move the generator to the vehicle shed, 5) improve access to the cookhouse to meet Americans with Disabilities Act requirements (ADA) and 6) improve the water system by fixing the current spring box or drilling a well.

The *Allison Guard Station Improvement Project Environmental Assessment* (EA), August 2004, is the supporting environmental analysis for this proposal, and is incorporated by reference (40 CFR 1502.21). The EA briefly discusses the need for the project, the alternatives considered, the environmental impacts of the proposed project and alternatives, and a listing of agencies and persons contacted. It also identified the following items as factors in determining the decision:

- Preservation of this eligible National Historic Register Site and the *Preserve America* EO,
- Continued use of the site as a housing facility for fire crews,
- Safety for the fire crews and renters using the facilities, and
- The annual maintenance and life-cycle costs for this facility (value analysis).

I find that the proposed reconstruction work, which is being prepared with the oversight of the State Historic Preservation Office, would ensure this National Register eligible site would be preserved for its historic and social values. None of the work would reduce the sites eligibility or reduce the historic value of these Civilian Conservation Corps (CCC) constructed buildings, and meets the intent of the National Historic Preservation Act. It would also meet Executive Order (EO) 13287 – *Preserve America*, which instructs me to protect, enhance, and provide contemporary use of historic properties.

The site is the location of an important fireguard station. I believe its continued use is essential for good resource management. The stationing of crews there means a quicker response time for initial attack efforts in the surrounding area and a reduced chance of an escaped wildland fire. I realize

that large fires may still happen across the Forest as in 1990, 1996, and 2002; however, I believe it is still prudent management to reduce this threat by maintaining guard stations like Allison. Reducing the amount of acres lost to wildland fire means other resource management options like pre-commercial thinning and prescribed fire can be done on more acres. The combined use of these management options can be used to help restore the natural role of fire back into these ecosystems without catastrophic loss of forest cover and of soils that is more readily seen in large wildfires.

Safety is always one of my primary concerns. I find the proposed reconstruction and upgrading the water facilities would maintain the site to current and expected safety standards. It would also increase the livability for the firefighters stationed there, and continue its value as a recreation rental.

The value analysis for this site indicates the proposed items are economically sound, and I agree. While the current life-cycle cost is only \$10,900 per year, this historic site would further deteriorate and would eventually lose most if not all of its historic value. The cost of initial attack for fire suppression would increase if the guard station were abandoned. This would lead to an increased response time for initial attack, which could lead to more acres lost to wildfire, increasing the loss of other resource values. The proposed water system and building improvements will cost approximately \$785,000. The maintenance and replacement (life-cycle) costs after the improvements are completed would be approximately \$32,000 per year. However, the structures would be preserved, and water quality standards met. These costs would be slightly offset by the continued availability of the site as a recreation rental. The continued use as a guard station would save

response time for wildfire starts in the area, maintaining other resource values.

I also considered my duties under the National Forest Management Act as implemented through the amended *1989 Ochoco National Forest Land and Resource Management Plan* (Forest Plan) for objectives, standards, and guidelines. As the Malheur National Forest Supervisor, I have the administrative responsibility for the National Forest System lands of the former Snow Mountain Ranger District, Ochoco National Forest. The proposed action takes place on these lands, and these lands are still under the jurisdiction of the Ochoco Forest Plan. The guard station is allocated to Management Area F28 *Facilities*, and the proposed actions are consistent with the Forest Plan. I am incorporating by reference the *1989 Final Environmental Impact Statement* for the Forest Plan. This document is a detailed statement on the issues, alternatives, and effects of implementing the Forest Plan. For other findings required by law, see my discussion below in the Finding of No Significant Impact (FONSI).

I also considered the issues identified internally and by the public for this project. The main issues are the preservation of this National Historic Register eligible facility, and maintaining its essential role as an active guard station for wildland firefighting. I considered these issues and weighed and balanced them with the four decision factors identified above, the environmental effects of the project disclosed in the EA, the long- and short-term costs, plus the laws and regulations that are affecting the proposal when I made my decision.

Need for the Proposal

The purpose and need for the Allison Guard Station improvement project is to prevent the deterioration of this historic site, while providing safe living conditions for employees stationed there and recreational rental users by meeting building code specifications and water quality standards. Without these improvements, it is anticipated the life expectancy of the buildings would be lowered, eventually deteriorating beyond a point where they can economically be repaired or safely used. Currently, two houses are not safe for occupancy. The bunkhouse will not be useable within approximate 5 years. Safe drinking water would eventually become an issue.

Additionally, on March 3, 2003, President George W. Bush issued Executive Order (EO) 13287 – *Preserve America*. This order instructs federal agencies “to provide leadership in preserving America’s heritage by actively advancing the protection, enhancement, and contemporary use of the historic properties owned by the Federal Government, and by promoting intergovernmental cooperation and partnerships for the preservation and use of historic properties.”

Other Alternatives Considered

In addition to the selected alternative, I considered one other alternative in detail, the No Action Alternative. Under the No Action Alternative, none of the proposed activities would take place. As the EA indicates, the purpose and need for the proposal would not be met. The site would deteriorate to a point where the fire crews or recreational renters could not safely occupy it. Eventually, the structures would lose their historic value, and repair would be

even more expensive. For these reasons I did not select this alternative.

The EA also identifies an alternative dropped from detailed consideration. This alternative would have hauled potable water to a holding tank. The costs were considered too prohibitive; therefore, this alternative was considered not implementable, and I agree.

Mitigation and Monitoring

The EA identifies the following mitigation, and it will be adhered to:

- All work on historic structures at Allison Guard Station will be coordinated with SHPO prior to initiating action, and building designs will match the historic CCC character.
- Sediment trapping as needed during spring box improvement or well drilling.
- Survey and removal of frogs prior to water improvement work.
- Heavy equipment used for any of the project work will be washed before entry onto the Forest to prevent the spread of noxious weeds. This is an early treatment action to control noxious weeds from occupying the disturbed ground created by this project by moving in from adjacent areas or carried in on equipment.

Public Involvement

A scoping letter was sent on April 4, 2003, to everyone on the Malheur schedule of proposed actions (SOPA) mailing list. There was one respondent, Richard Grace. Mr. Grace is a former acting Forest Supervisor for the Malheur National Forest and former Recreation Director for Region 6. He supported the proposed action and stated, “This is a significant historic site and

your treatment of the facilities will protect all historic values.”

This project was listed in the quarterly SOPA since the scoping letter. In addition, public notice of availability to comment on the EA was placed in the Blue Mountain Eagle, the newspaper of record, on September 1, 2004, and in the Burns Times-Herald on August 18, 2004.

I received comments on the EA from Richard Grace and Ron Skrip. Mr. Grace's comments continue to be supportive. Mr. Skrip served as the Snow Mountain District Ranger from June 1970 to August 1975, and has extensive knowledge of the site. He states, “I know of no other National Forest facility in the North West Region that is a more complete example of Depression Era construction.” His comments are also supportive; however, he mentions that the “Donaldson Cabin” should be correctly referred to as the “Donnelly Cabin”, after early Snow Mountain District Ranger Donnelly. The full text of their comments are found in the project file pursuant to 36 CFR 215.6(b).

I asked Forest Archaeologist Don Hann to review the records for the correct name of the cabin. He informed me that “Donnelly” is the correct name. The cabin was built in 1911 by Ranger Donnelly and was in use until 1935 (site reports for 674EA4). I have determined this is a minor, non-substantive correction to the EA.

Finding of No Significant Impact

I have reviewed the Council on Environmental Quality Regulations for Significance (40 CFR 1508.27) and I have determined that the decision is not a major federal action that would significantly affect

the quality of the human environment either individually or cumulatively; nor would this decision affect the quality of the human environment in either context or intensity. Therefore, an environmental impact statement will not be prepared. This conclusion and finding is based on the following factors found in the documentation:

Context

Allison Guard Station is an important CCC built set of structures on the Ochoco National Forest. Nationally, regionally, and locally many of these structures are being lost due to deterioration, vandalism, or natural disaster (EA pp. 9-10). However, this decision will allow these structures to be preserved, thus maintaining their historic value locally, regionally, and nationally. Both the short- and long-term effects of the proposed reconstruction and other improvements would maintain the eligibility of these structures for inclusion in the National Register of Historic Places. Therefore, the decision to implement the proposed action is not significant.

Intensity

1. The EA identifies both the beneficial, adverse, and cumulative impacts under Question 5 (pp. 4-10). On the whole, the environmental effects are short-term (less than 5 years), and the long-term effects are the social benefits of preserving the historic CCC structures and site while maintaining its use as a fireguard station. I do not believe that meeting my responsibilities under the National Historic Preservation Act or the EO on *Preserve America* by undertaking these improvements to maintain this site would significantly affect the human environment (40 CFR 1508.14).

2. The proposed reconstruction, remodeling, and maintenance would continue to benefit public health and safety for the use of these facilities by firefighters stationed there, recreation renters, and the general public (EA pp 2-3, & 9-10). The water improvement would assure that water quality standards would continue to be met (EA pp 1, 3-4, 6-7, & 9). Therefore, the degree of change is minimal and non-significant because we will continue to maintain the appropriate standards.
3. No prime forestland or rangelands (EO 11514 *Environmental Quality*), flood plains (EO 11988 *Floodplains*), and wetlands (EO 11990 *Wetlands*) will be lost due to these activities. The site is eligible for inclusion in the National Register of Historic Places; therefore, the geographic area has unique historic characteristics. It is also adjacent to the Donnelly Cabin site, which is listed on the register (EA p. 6). However, the EA discloses that there are no effects, including cumulative to this heritage resource by the proposed action (EA p. 6), and there is no evidence of buried historic or prehistoric components at the site (EA p. 5). It further discloses that we have been consulting on this proposal with the Oregon State Historic Preservation Office (SHPO), and “the historic attributes of the guard station will be protected or enhanced through implementation of the proposed action” (EA p. 6). I visited Allison Guard Station and the Donnelly Cabin on July 20, 2004 with members of the Forest Leadership Team. I personally noticed that the proposed action is far enough away from the Donnelly Cabin that there would be no affect to the cabin or its historic landscape. Since the proposal is maintaining the historic value of Allison Guard Station, is being done in consultation with SHPO, the actual changes are minor, and there will be no loss of the historic context, the proposed action is not significant.
4. The effects of proposed action on the quality of the human environment are outlined in the EA (pp. 5-10). There is no controversy over the nature of the effects, nor has scoping or public review of the analysis enlisted public controversy. Therefore, the effects are not significant.
5. The EA does not identify any effects on the human environment that are highly uncertain or involve unique or unknown risks (EA pp. 5-10). The effects of drinking water developments and housing reconstruction and maintenance are widely known. The proposed action does not include anything unique; therefore, this action is not significant.
6. This decision does not set a precedent for future actions with significant effects nor does it represent a decision in principle about a future consideration. The Ochoco Forest Plan lists this guard station as Management Area 28, Facilities (MA-F28). Nothing in this decision changes that designation (EA p. 7). This decision maintains or enhances the current eligibility of these historic structures for the National Register of Historic Places; therefore it is not significant (EA p. 6).
7. The EA addresses cumulative effects (EA pp 5-10). During my review of them, I did not see anything that would result in the accumulation of similar effects or create a synergistic interaction of different effects. Therefore, I have determined the cumulative effects are insignificant because of the low probability they will occur or because the required mitigation measures will reduce their magnitude. The mitigation measures are common and have been

effectively used in the past. For example the EA identifies the “swampy area” as a natural barrier that traps sediment from reaching Allison Creek and sediment traps will be used as necessary to minimize the amount of soil displacement (EA p. 7).

8. This decision will not cause loss or destruction of significant scientific, cultural, or historical resources. Because of the reasons I disclosed in item 3 above, they will be maintained or enhanced. A cultural report has been completed in compliance with the National Historic Preservation Act requirements, and it and the EA have been shared with SHPO.
9. A biological evaluation (BE) was prepared for this project, and a summary of the findings is found in the EA (pp. 7-9). No impacts are expected on sensitive plant species or endangered fish species. There is no known use of the area by the bald eagle. The Columbia spotted frog, a sensitive species, has been documented in the project area. However, as mitigation, the area will be surveyed for frogs just prior to implementing the water system improvements. The EA discloses this technique has been successfully used to mitigate effects for other activities (EA p. 8); therefore, the proposed action will not likely contribute to a trend toward federal listing, and is not significant.
10. The implementation of this decision will not threaten the violation of Federal, State, or local laws, or requirements imposed for the protection of the environment relevant to this decision. A BE, EA, and cultural report have been completed in fulfillment of the Endangered Species Act, National Environmental Policy Act, and National Historic Preservation Act. Clean Water Act and Federal Water Pollution Control

Act Amendments are being met by the use of sediment traps (Best Management Practices) to reduce sediment and are the point and non-point source pollution control tool for this project (EA p. 10). The EA (pp. 1, 3-4) shows the proposed project is in compliance with the *1989 Ochoco National Forest Land and Resource Management Plan* as amended, thus the requirements of the National Forest Management Act are met. The EA shows that this decision would meet EO 13287 *Preserve America* (EA pp. 9-10). There is nothing in the EA that suggests there would be any disproportionate adverse environmental effects to minority or low-income populations (EO 12898 *Environmental Justice*). The proposed action will in fact maintain this CCC constructed site equally for all Americans. The mitigation measures in place to reduce the spread of noxious weeds (EA pp. 7-10) meet the intent of EO 11987 *Exotic Organisms* and EO 13112 *Invasive Species*. The EA does not identify any effects to migratory birds (EO 13186 *Migratory Birds*). Furthermore, direction on administrative sites like Allison Guard Station is found in the Forest Service Manual at 7300 *Buildings and Other Structures* and 7420 *Drinking Water*, plus Forest Service Handbooks 7309.11 *Buildings and Related Facilities Handbook* and 7409.11 *Sanitary Engineering and Public Health Handbook*. Nothing in this decision is contrary to these regulations and guidelines. Therefore, implementation of this decision is not significant.

Administrative Appeal Opportunity

Pursuant to 36 CFR 215.12(e)(1), this decision is not subject to appeal because no substantive comments expressing concerns and only supporting comments were received during the comment period for this proposed action.

Implementation Date

Pursuant to 36 CFR 215.9(c), implementation may begin immediately after publication of the legal notice of this decision in the *Blue Mountain Eagle*, the newspaper of record.

Contact Person

For further information, contact Bill Supulski, Planning Staff, at P.O. 909, John Day, OR 97845, or by telephone at (541) 575-3140.



ROGER W. WILLIAMS
Forest Supervisor

October 5, 2004