Draft Environmental Assessment

Blue Point Campground & Day Use Removal and Restoration Project

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Ventura County, California

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SUMMARY

The Los Padres National Forest proposes to decommission Blue Point Campground, Day Use Area (BPCG-DUA) and all associated infrastructure, including portions of the road, parking spurs, concrete ford, and rip-rap bank protection. After the removal of the campground, structures, and facilities, the area will be rehabilitated with mechanical equipment to decompact soils, as needed, and restore natural contours allowing for revegetation to occur. The project area is located along Piru Creek 13 miles north of Piru, California, and is approximately 20 acres in size.

The campground and day use were originally closed in 2000 to mitigate recreation use conflicts with Federally listed threatened and endangered species and their habitats. In 2007, the Ranch Fire burned through the area and damaged many of the recreation facilities. This action will remove the abandoned facilities, mitigate the safety hazard, and improve riparian conditions by restoring the area to natural conditions in compliance with the Los Padres National Forest Land Management Plan.

No major issues were raised during scoping beyond the analysis already planned for multiple resources by the interdisciplinary team. Several nearby property owners were concerned about the condition of the road through the day use area leading to their properties. That road segment will be left in place and managed as part of the national forest road system. In addition to the Proposed Action, the Forest Service also evaluated an alternative that that would take no action on the damaged, abandoned campground and day use facilities, and result in no restoration of the site.

The Proposed Action may have short-term effects due to temporary loss of soil cover, disturbance to active stream channels, and temporary flow diversion around the concrete ford removal site, which could increase turbidity. Also, there could be short-term threats to arroyo toads, which might result in incidental take or adverse modification of critical habitat, and to birds nesting on or near the ground that could be susceptible to disturbance during project implementation.

The removal of BPCG-DUA and site restoration would have long-term beneficial effects, such as the creation of more diverse and natural in-channel morphologic features (point bars and pools), a more naturally free-flowing stream channel, and improvement to the riparian vegetation component at the water crossing and along the stream bank. It will also beneficially affect the arroyo toad in the long term by further alleviating recreational pressure in an area of important toad habitat, and by restoring that habitat to a more natural condition, increasing habitat quality and quantity. It is possible there could be a slight improvement in water quality by removing the hardened surfaces and reducing areas of accelerated runoff once these areas have revegetated naturally. Additionally, removal of the outhouses would prevent future use and possible risk to water quality.

Based upon the effects of the alternatives, the responsible official will decide whether to implement this project as proposed, modify the project to address any unresolved conflicts, or to not implement the project.
INTRODUCTION

Document Structure

The Forest Service has prepared this Environmental Assessment (EA) in compliance with the National Environmental Policy Act (NEPA) and other relevant Federal and State laws and regulations. This Environmental Assessment discloses the direct, indirect, and cumulative environmental impacts that would result from the proposed action and alternatives. The document is organized into four parts:

- **Introduction**: The section includes information on the history of the project proposal, the purpose of and need for the project, and the agency’s proposal for achieving that purpose and need. This section also details how the Forest Service informed the public of the proposal and how the public responded.
- **Comparison of Alternatives, including the Proposed Action**: This section provides a more detailed description of the agency’s proposed action. This discussion also includes possible mitigation measures. Finally, this section provides a summary table of the environmental consequences associated with each alternative.
- **Environmental Consequences**: This section describes the environmental effects of implementing the Proposed Action. This analysis is organized by resource area. Within each section, the affected environment is described first, followed by the effects of the No Action alternative that provides a baseline for evaluation and comparison of the Propose Action alternative.
- **Agencies and Persons Consulted**: This section provides a list of preparers and agencies consulted during the development of the environmental assessment.

Additional documentation, including more detailed analyses of project-area resources, may be found in the project planning record located at the Ojai Ranger District Office in Ojai, California.

Background

The Blue Point Campground and Day Use Area (BPCG-DUA) is located approximately 13 miles north of Piru, California (SW¼, Sec. 10, T5N R18W SBBM of the **Cobblestone, California** U.S. Geological Survey 7.5 minute topographic quadrangle). The project area is located in the Ojai-Piru Front Country Place within Back Country and Back Country Non-Motorized land use zones as identified in the Los Padres National Forest (LPNF) Land Management Plan (Forest Plan). Private lands are interspersed with LPNF administered lands in the project vicinity.

In 2000, the Blue Point Campground and Day Use Area (BPCG-DUA) was closed for the protection of endangered species (Endangered Species Act of 1973) and their habitats, particularly the arroyo toad, as a part of the Southern California Conservation Strategy. The campground is adjacent to Piru Creek, and includes designated critical habitat for the arroyo toad (listed in 1994), California red-legged frog (listed in 1996) and southwest willow flycatcher (listed in 1995). In addition, the project area contains suitable habitat for other federally-listed species such as California condor and least Bell’s vireo, and...
Forest Service Sensitive species such as California legless lizard, two-stripe garter snake, San Bernardino ring-neck snake and western pond turtle.

Portions of the Piru Creek watershed burned during the 2003 Piru Fire, but the campground and day use area were unaffected. BPCG-DUA remained closed through 2007, when the Ranch Fire burned through the campground, damaging many of the existing recreational facilities (picnic tables, bathrooms, fire rings, water standpipes, and signs). Since 2007, BPCG-DUA has remained closed. It is being considered for decommissioning because the cost of infrastructure replacement and recreational site management conflicts with threatened, endangered, proposed, candidate and sensitive species (TEPCS). These conflicts are impediments to making the campground operational.

**Purpose and Need for Action**

The purpose of this project is to remove all of the improvements associated with BPCG-DUA, mitigate the hazards from burned and deteriorating improvements, and restore the campground and day use area to a natural condition.

This action is needed to comply with the Forest Plan, and will help move the project area towards desired conditions. Forest Plan Goal 3.1, Managed Recreation in a Natural Setting, (USDA Forest Service, 2005, (pg. 33)) includes:

> Facilities and infrastructure are high quality, well maintained, safe, accessible, and consistent with visitor expectations. Abandoned facilities and facilities no longer needed are removed and sites are restored to natural conditions.

The campground and day use area have been closed since the year 2000, and are in an unsafe state of disrepair and deterioration. The Ranch Fire exacerbated this situation in 2007 by partially burning many of the consumable improvements. There are no plans to reestablish recreation at the site due to conflicts with endangered species, and the site has been abandoned. Therefore the campground and day use area improvements need to be removed and the site restored to natural conditions.

This project is also needed to improve riparian conditions, and to provide ecological conditions to sustain viable populations of native species consistent with Forest Goals 5.2 and 6.2 (USDA Forest Service 2005, Part 1). The campground and day use area were originally closed to protect federally listed species and their habitats that were impacted by recreation use at the site. Decommissioning the recreation area improvements and restoring the site will improve the hydrologic function of Piru Creek, and habitat for federally listed species.

Forest-wide standards and guidelines will be incorporated to ensure the project conforms to the Forest Plan. Also, the project will meet all applicable local, state, and federal laws, such as the Endangered Species Act, Clean Water Act, National Historic Preservation Act, and Wild and Scenic Rivers Act.

**Proposed Action**

To meet the purpose and need for action, the Forest Service proposes to remove all facilities and improvements associated with the Blue Point campground and day use area,
including the concrete ford and rip rap-revetment, and restore the site to a natural condition. See Alternative 1 below for a more detailed description of the Proposed Action.

Public Involvement

As part of the public involvement process, the Forest Service contacted interested members of the public and other government agencies on July 23, 2014 by letter, describing the project with a request to comment by August 27, 2014. In addition, a legal notice was published in the Ventura County Star on July 31, 2014, and a field visit to the project site hosted on August 8, 2014. Cherry Carlson and Juan Carlo from the Ventura County Star participated in the field visit and published an article on the project on August 13, 2014. The proposal was also listed in the Schedule of Proposed Actions in August 2014. Upon discovering that several interested or affected individuals did not receive notification of the proposal, the scoping letter was sent to them and they were provided with an opportunity to comment from September 10, 2015 – October 10, 2015. Several tribal groups (Barbarano Venturano Band of Mission Indians, and Tataviam Band of Mission Indians) were contacted and no comments were received.

During the initial public comment opportunity in 2014, nine individuals provided feedback on the proposed action. Overall, there was support of the project proposal with an interest in salvaging amenities (table planks/fire rings). One comment suggested restoring the historic site. Two comments were received during the 2015 scoping period expressing concern that project related traffic will exacerbate existing damage to Road 4N13.3 during implementation. This concern was addressed in the Proposed Action.

Using the comments from the public, other agencies, and Interdisciplinary Team (IDT) field visits the IDT developed a list of issues to address (see Issues section).

Issues

The Forest Service separated the issues into two groups: key issues and other issues. Key issues were defined as those directly or indirectly caused by implementing the proposed action. Other issues were identified as those: 1) outside the scope of the proposed action; 2) already decided by law, regulation, Forest Plan, or other higher level decision; 3) irrelevant to the decision to be made; or 4) conjectural and not supported by scientific or factual evidence. The Council on Environmental Quality (CEQ) NEPA regulations require this delineation in Sec. 1501.7, “…identify and eliminate from detailed study the issues which are not significant or which have been covered by prior environmental review (Sec. 1506.3)…”.

There were no key issues identified from public involvement. The IDT identified the following resource concerns to evaluate further as part of this analysis during numerous field trips to the project area from 2014 to 2016:

- Federally listed and Forest Service Sensitive species and their habitats, including Arroyo toad, California red-legged frog, and Southwestern willow flycatcher;
- How the project will impact the hydrological function of Piru Creek;
• Impacts to recreation and visual resources, including the portion of Piru Creek (Segment 7) eligible for designation as a Wild & Scenic River, and the Sespe-Frazier Inventoried Roadless Area within the project area.

Analysis of these topics and other resources are included in the Environmental Consequences section of this document.

ALTERNATIVES, INCLUDING THE PROPOSED ACTION

This section describes and compares the alternatives considered for the Blue Point Campground & Day Use Removal and Restoration Project. It includes a description of each alternative considered. This section also presents the alternatives in comparative form, sharply defining the differences between each alternative and providing a clear basis for choice among options by the decision maker and the public.

Alternative 1 – Proposed Action.

The Forest Service proposes to decommission Blue Point Campground & Day Use Area by completing the following actions (Figure 1):

• Remove all facilities and infrastructure within the campground and day use area, including campsites, day use area, bathrooms, gates, walking bridge, and well.

• Remove the rip rap revetment and concrete ford.

• Remove chip seal parking spurs within the day use area, and all chip seal and roads within the campground. The portion of Forest Service Road 4N13.3 within the day use area will remain. However, the portion of the road beginning from the west side of the concrete ford and east to the campground, will be decommissioned and removed from the National Forest System road database.

• Rehabilitate the area with mechanical equipment to decompact soils, restore natural contours, and provide conditions for natural revegetation to occur.

• Noxious weeds will be treated by hand or mechanical methods, or avoided to the extent practicable to prevent spread.

Project implementation will be completed during the late summer to mid-autumn timeframe to coincide with low-stream flows in Piru Creek, and to minimize impacts to wildlife. It is anticipated that September 1st – November 15th will be best time to complete implementation with those objectives in mind. The campground will be decommissioned prior to removing the rip rap revetment and concrete ford. Dewatering of the creek immediately above and below the concrete ford will be completed in advance of removal. The area of impact within the stream channel and removal timeframe will be minimized as much as possible. It is anticipated removal of the concrete ford will occur within a 3-day time period.
Resource Protection Measures

Resource protection measures were developed to eliminate or reduce potential impacts, and apply to the Proposed Action (Alternative 1).

Wildlife

- Project implementation should occur between late summer and mid-autumn (September 1 - November 15) to avoid impacts to breeding wildlife.
- Surveys should be conducted immediately prior to project work beginning to determine if dispersing arroyo toads or red-legged frogs are in the area, or if migrating willow flycatchers are present.
- Micro-trash will be removed from the project area immediately following project implementation.
- If condors are observed within the project area, utilize Condor Recovery Program Guidance on Hazing California Condors (USDI-Fish and Wildlife Service 2014) to deter condors from being impacted by project activities.

Migratory Birds

- If possible, avoid conducting project implementation activities during the breeding season for migratory birds (March 15-July 31). Birds are most vulnerable to disturbance during the incubation and nestling stages of reproduction. Delaying project activities until young have fledged and are fully mobile dramatically decreases the likeliness of detrimental effects.
- Work crews should receive training on avoiding unnecessary impacts to breeding birds and other wildlife species prior to conducting project activities.
- Creek dewatering procedures should avoid any alteration of riparian vegetation around the concrete ford. This riparian shrub habitat is federally protected as southwestern willow flycatcher critical habitat, and the agency is responsible under the Endangered Species Act for not adversely modifying this habitat. Additionally, this habitat also serves as suitable habitat for least Bell’s vireo, another federally-listed species.

Hydrology

- In order to minimize disturbance within Piru Creek, the concrete ford will be removed after removal of all campground facilities on the east side of the stream is completed. The decommissioning will necessitate allowing equipment within the inner gorge, floodplain and the channel bottom of Piru Creek to facilitate the removal of the campground infrastructure and the concrete low water crossing.
- Schedule operations when rain and runoff are least likely to occur. Follow the Forest Wet Weather Operating Standards, and notification protocols, as outlined in an approved Erosion Control Plan (Best Management Practices (BMP) 2.13). Optimally, plan surface disturbance activities to begin when precipitation in excess of 0.1 inches is unlikely, depending on stream flow and weather conditions.
- Native woody riparian vegetation should not be cut or removed, except where needed to facilitate project implementation. Maintain vegetation where practicable to provide adequate shade to meet riparian objectives (based on the potential of the site).
• FS Road 4N13.3 will be inspected pre- and post-project implementation, and any
damage to the road that prevents safe and reasonable access will be evaluated.
• No temporary or permanent roads are to be constructed. Project activities will
occur on existing transportation routes only.
• The Forest Service and/or contractor(s) will develop a Water Pollution Control
Plan. This plan will specify details related to sediment and hazardous materials
control, dewatering or diversion structures, fueling and equipment management
practices, and other factors determined by the Forest project engineer and
hydrologist, biologist, or other equivalent resource specialist.
• Designate debris and sediment disposal sites in advance and follow procedures
outlined by the hydrologist, biologist, or other equivalent resource specialist.
Debris and materials removed during campground and day use area
decommissioning will not be disposed of within Riparian Conservation Areas
(RCAs).
• Equipment storage, fueling and staging areas should be located on upland sites
and use spill containment measures that result in minimal risks of direct drainage
into RCAs. Primary staging and servicing areas are needed within the RCA
because the activities and all ingress and egress to the project site fall within a
RCA; there are no other alternatives for staging, fuel storage or equipment
servicing within a reasonable distance (less than a mile).
• All parking, staging and service areas require the installation and maintenance of
erosion control features such as straw wattles, silt fencing, or any other acceptable
method to prevent sediment from reaching the stream channel. Re-fueling of gas-
powered machinery will not occur within the floodplain or within 20 feet from the
inner gorge of Piru Creek. The Los Padres National Forest Hazardous Substance
Pollution Contingency Plan will be kept on site during project activities and will
be followed.
• Keep erosion-control measures (straw wattles, silt fences, etc.) sufficiently
effective during ground disturbance to allow rapid closure when weather
conditions deteriorate. Complete all necessary stabilization measures prior to
predicted precipitation that could result in surface runoff.
• Brush, loose soils, or other similar debris material will not be stockpiled within
the stream channel or on its banks where it may impact federally listed TEPCS
species or wash into the stream.
• Hazardous materials should be stored at safe distances from RCAs where possible
and in a designated location designed to contain any spills. All refueling of
vehicles should be conducted at designated sites outlined in the Project Spill Plan
to prevent any spillage from entering the stream. Cleanup of all project related
spills of hazardous materials should follow the Forest Hazardous Materials
Response Plan. Spills of hazardous materials should be cleaned up immediately
and contaminated soils removed to disposal sites that are approved by the project
engineer and hydrologist, biologist, or equivalent resource specialist.
• Roads will be decommissioned by ripping 6 to 8 inches deep (BMP 2.13).
• To reduce the risk of compaction, equipment operation will occur on dry or
slightly moist soil. Soil ball test will be conducted or supervised by Forest Service
personnel.
• Before removing campground and day use area structures using mechanical
equipment establish a containment buffer using certified weed-free straw wattles
or silt fences. Properly install silt fences or secure waddles downslope of soil disturbing activities to prevent potential sediment from entering Piru Creek.

- Stabilize the project area during normal operating season when the National Weather Service predicts a 30 percent or greater chance of precipitation, such as localized thunderstorm or approaching frontal system. Stabilize project area by retaining or re-establishing soil cover to 60 to 70 percent on all disturbed areas. Use certified weed-free straw where existing soil cover (i.e. litter, slash, grass) is insufficient.

- Minimize the use of mechanical equipment within the stream channel or live water. For decommissioning facilities in the campground and day use area that do not include the concrete ford removal, maintain the widest buffer feasible between the stream channel and ground disturbing activities. Prior to ground disturbing activities mark the buffer edge (at least 20 feet). Use wood stakes when feasible and remove all marking materials when complete.

- After removal of the concrete ford and chip seal, the crossing site will be re-contoured to best match in-channel topography both upstream and downstream of the crossing to prevent any potential headcuts or incision.

- Permit application to the USACE, the Water Quality Control Board, the State Fish and Wildlife Service will be used to refine the erosion control and dewatering plan to minimize risk to water quality during the removal and restoration process.

**Botany/Noxious Weeds**

- Post implementation monitoring and treatment of noxious weeds will be completed as time and funding allows.

**Cultural Resources**

- Exclusionary fencing or flagging is required to be installed at the location noted in the Cultural Resource Report (Galbraith 2014) prior to the commencement of work activities.

- A meeting between Forest Heritage Resources staff, Forest Project Manager, and the contracted Site Manager shall take place prior to the commencement of work activities to ensure the exclusion area is known to the field crew.

**Recreation/Visual Resources**

- After improvements are removed, shape land forms to mimic natural contours as directed by specialists. Prioritize landscape restoration activities in key places.

- To protect public safety of recreationists, implement temporary closures in the project area for the duration of the project. Ensure sufficient public and internal notice is provided prior to these closures. Coordinate closures with recreation personnel to ensure appropriate signing is posted.
Figure 1. Blue Point Campground and Day Use Removal & Restoration Project Map.
Alternative 2 – No Action

Under the No Action alternative, current management plans would continue to guide management of the project area. No changes would be implemented to accomplish Forest Plan goals and objectives. The campground and day use area would remain closed on a year-round basis and continue to decline into further disrepair. The concrete ford and rip-rap revetment would remain and continue to alter the natural flow and hydrological function of Piru Creek. The existing partially burned restrooms, picnic tables and associated structures would remain, and continue to act as an “attractive nuisance” and safety hazard to the public.

Comparison of Alternatives

This section provides a summary of the effects of implementing each alternative. Information in the table is focused on activities and effects where different levels of effects or outputs can be distinguished quantitatively or qualitatively among alternatives.

Table 1. Summary of Effects

<table>
<thead>
<tr>
<th></th>
<th>Alternative 1 Proposed Action</th>
<th>Alternative 2 No Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Meets Purpose &amp; Need to remove BPCG &amp; DUA</td>
<td>Yes; BPCG-DUA would be decommissioned.</td>
<td>No; BPCG-DUA would remain and fall into further disrepair.</td>
</tr>
<tr>
<td>Effects to Threatened &amp; Endangered Species</td>
<td>Short-term effects. Project complies with ESA. Will improve arroyo toad habitat quality and quantity in the long-term.</td>
<td>Existing infrastructure will continue to negatively affect riparian obligate species.</td>
</tr>
<tr>
<td>Effects to Hydrologic Function</td>
<td>Concrete ford and rip-rap revetment would be removed restoring natural flow and hydrological function.</td>
<td>Concrete ford and rip-rap revetment would remain and continue to alter natural flow of Piru Creek.</td>
</tr>
<tr>
<td>Effects to Wild and Scenic River</td>
<td>Free-flowing condition enhanced by removal of concrete ford.</td>
<td>Concrete ford remains an impediment to free-flowing condition.</td>
</tr>
</tbody>
</table>

ENVIRONMENTAL CONSEQUENCES

This section summarizes the physical, biological, and social environments of the affected project area, and the potential changes to those environments due to implementation of the Proposed Action. It also presents the scientific and analytical basis for comparison with the No Action alternative presented in the previous section. The resource discussion within this section are based on the following specialist reports that are incorporated by reference and in the project record: Wildlife Biological Assessment/Evaluation (Lieske 2015), Migratory Birds Assessment Report (Lieske, 2014); Management Indicator Species Report (Lieske, 2014); Hydrology Report (Blaschak/Immecker, 2017);

Wildlife (TEPC & FSS)

The Wildlife Biological Assessment/Biological Evaluation (Wildlife BA/BE) addressed the impacts of the proposed action on Threatened, Endangered, Proposed, Candidate (TEPC) and Forest Service Sensitive (FSS) wildlife species. This analysis determined if a species is likely to occur within the project’s area of effect (AOE), and whether they are expected to be affected by the project activities, and to what degree. This section is based on the analysis within the Wildlife BA/BE (Lieske 2015), and discloses the effects of the proposed action, followed by those associated with the No Action alternative.

Spatial limits for analysis were set at 3 different scales; site (14.35 ac), local (1 mile from the site centroid), and vicinity (1-10 miles from site centroid). Analysis was conducted at multiple scales to account for potential reasonable and foreseeable actions which may affect both federally-listed and FSS species. The temporal limits for analysis were constrained at 5 years before and following the completion of implementation. This time period was deemed adequate to encompass previously occurring actions and to evaluate the modification and recovery of the riparian corridor following the removal of the campground infrastructure and the concrete ford.

Alternative 1 (Proposed Action)

Arroyo Toad (TEPC)

Direct effects

There is some potential for arroyo toad (ARTO) tadpoles, sub-adults or adults to be injured or killed during project implementation. The most likely risks would be related to the transport of heavy equipment across the concrete ford during equipment staging and during the removal of the concrete ford. ARTOs could be run over by equipment, injured during the dewatering process (adults, sub-adults or tadpoles) prior to crossing removal, or injured/killed by heavy equipment during the crossing removal (adults and sub-adults).

The probability of ARTOs being injured or killed is considered low overall, but is also highly dependent on the status of local breeding activity during the year when implementation occurs. During a year of high reproduction, ARTO tadpoles and toadlets upstream of BPCG-DUA at Agua Blanca Creek could be washed downstream into the project area. Also, following a year of high reproduction adult toads will likely be more numerous within the local project area, and more likely to occur within the site footprint.

The Proposed Action includes a resource protection measure to reduce potential impacts to ARTO. Surveys will be conducted immediately prior to project work beginning to determine if dispersing arroyo toads or red-legged frogs are in the area. If necessary a biological monitor will be present on-site during implementation. Having a qualified biologist on-site to evaluate the local breeding status for the species under those circumstances would greatly reduce the probability of toads being negatively impacted by the project.
Indirect effects

There is some risk that the species may be indirectly affected by fluid leaks originating from heavy equipment operating on land or in the stream channel. Chemical compounds such as hydraulic or transmission fluid could potentially adversely affect either tadpoles, toadlets (juveniles) or adults if they are exposed to them.

The project contains resource protection measures for both the containment and cleanup of chemical spills if they should occur, in order to protect water quality and prevent impacts on wildlife species. These measures are considered sufficient to alleviate the majority of risk associated with this impact occurring.

Determination

Project activities May Affect, and are Likely to Adversely Affect ARTO. However, the removal of BPCG-DUA will also Beneficially Affect ARTO in the long term, both by further alleviating recreational pressure in an area of important habitat and by restoring that habitat to a more natural condition; which should both increase habitat quality and quantity. BPCG-DUA was originally closed because ARTOs are known to use the habitats within the project AOE for breeding, dispersal and estivation. There is potential for the project to affect the species both directly and indirectly. Due to the overlap of ARTO habitats with locations where heavy equipment will be used (both on land and in the stream channel) for infrastructure removal, it is possible toads may be affected by heavy equipment operation. Any direct impacts from heavy equipment are likely to be lethal to the species, making it necessary to request an Incidental Take Statement from the U.S. Fish and Wildlife Service (USFWS) in order to conduct implementation. Recent monitoring (CA DWR 2014) has indicated that even in years with extremely poor environmental conditions (2012-14) the toads have continued to persist and breed in proximity to the project area at all three spatial scales used for analysis. Additionally, adult toads have been observed in close proximity to the concrete ford as recently as 2014 (CA DWR 2014).

Potential threats to ARTOs which might result in incidental take or adverse modification of critical habitat were identified during the Section 7 consultation process. A list of preventative/mitigation measures recommended by the USFWS consultation biologist were incorporated into the project as design criteria for project implementation. Utilization of these design criteria during the implementation process should minimize the probability of adverse effects to the species and their critical habitat to an extent that no significant impacts are likely to occur. These resource protection measures are covered in greater detail in the EA on page 5.

**California red-legged frog (TEPC)**

Direct effects

California red-legged frogs (CRLF) have not been observed within the site, local or vicinity spatial scales of the project area for over 30 years (Sam Sweet’s 1983 sighting, 0.75 mi upstream). Because they are highly unlikely to be present, the probability of actions related to project implementation impacting them directly is considered close to zero.
Indirect effects

As previously stated, CRLF have not been detected within the site, local or vicinity spatial scales of the project area to which indirect effects analysis is applied for over 30 years. Indirect effects of project actions are likely to be most intensive within the site footprint (noise disturbance, physical disturbance, air quality etc.) and to dissipate rapidly at increased distance (more extensively downstream) from the site. Effects such as noise disturbance and air quality alteration should not exceed 400m from the site footprint, while potential downstream effects to water quality would be limited to the vicinity scale of project analysis (1-10 miles from the site centroid). As CRLF have not been detected recently within any of these spatial scales they should not be impacted by this project.

Determination

Actions related to both the terrestrial infrastructure and concrete ford removal will have No Effect on California red-legged frogs. CRLF have not been detected within the site, local or vicinity spatial parameters of the project area for over 30 years. A 2005 record of a CRLF tadpole was reported about 1.25 km upstream of the project area, but is not considered credible, due to no reliable confirmation of adults, juveniles or tadpoles being present since 1983, despite intensive monitoring for amphibians on middle Piru Creek from 1999-2001 and 2010-2014. They are very likely no longer present in the area, due to the presence of numerous non-native species (red swamp crayfish, American bullfrog and tamarisk) which either modify habitat conditions or directly compete with CRLF for habitat and food resources.

Least Bell’s vireo (TEPC)

Direct Effects

While there are no records of Least Bell’s vireo (LBVI) breeding within the project’s AOE, there is potential that they may utilize this area in the future. If project activities overlap with the LBVI breeding period there is potential that these activities may detrimentally affect the species through disturbance of breeding activities (nest construction, incubation, nestling/fledgling rearing) due to physical or noise disturbance. Resource protection measures, such as implementing the project between late summer and mid-autumn, have been incorporated into the Proposed Action and are designed to avoid impacts during the breeding season.

Indirect Effects

Project activities could affect the species indirectly regardless of the timing of activities if project activities result in the modification of habitat which impairs the ability of LBVI from using the habitat effectively.

Determination

Project activities May Affect, but are Not Likely To Adversely Affect individuals of this species. Although Least Bell’s vireos haven’t been observed in close proximity to the project area recently, suitable habitat is available, and there is potential that individual birds may occur in the area if the Santa Clara River population continues to expand.
**Southwestern willow flycatcher (TEPC)**

**Direct effects**
If southwestern willow flycatcher (SWFL) occurred in the project area, breeding activity could be disrupted by physical disturbance or noise related to the operation of heavy equipment if implementation occurred during the summer breeding period. However it is considered unlikely that individuals would occur in the area as no recent records exist. Resource protection measures, incorporated into the Proposed Action, were designed to avoid project implementation activities during the breeding season for migratory birds (March 15 - July 31) and to conduct surveys immediately prior to project start date.

**Indirect effects**
Removal of the concrete ford could result in changes to riparian shrub habitat due to changes in hydrology. This could impact the ability of SWFL to effectively use this habitat if it results in changes to shrub cover density and variability. Other factors, such as chemical contamination could also impact SWFL by modifying the riparian shrub habitat.

**Determination**
Project activities will have **No Effect** on southwestern willow flycatcher. There have been no breeding records for the subspecies within the project area for several decades. It is considered unlikely that SWFL would occur within the project area during implementation, and unlikely that they would be negatively affected by activities related to implementation.

**Federally Designated Critical Habitat**
Designated critical habitat exists within the project’s area of effect for three federally-listed species; ARTO, CRLF and SWFL. Critical habitat for these three species would be potentially affected in slightly different ways by project implementation.

ARTO critical habitat extends along Piru Creek both above and below BPCG-DUA crossing. It is primarily linear, buffering along the creek’s riparian corridor. CRLF critical habitat occurs both above and below BPCG-DUA, centered on the riparian corridor, but extending into upland areas a considerable distance from available surface water. SWFL critical habitat is delineated along the riparian corridor both above and below BPCG-DUA, and is limited to the extent of riparian shrub vegetation used as breeding habitat by the species.

The removal of terrestrial infrastructure (picnic tables, roads, vault toilets, water hydrants etc.) should have negligible effects on the critical habitat present for any of species. The infrastructure removal should not substantially alter existing “natural areas” of habitat present within the site footprint. In the long-term, it is expected that there will be an increase in quality of critical habitat due to the removal of “non-natural structures” which somewhat impair the ability of wildlife to use a portion of the total land area within the site footprint. This is particularly relevant for ARTO and CRLF which may use these upland areas as either dispersal or estivation habitats in the future. This also applies to SWFL, which may use areas outside the stream channel for foraging as natural shrub cover is re-established.
The removal of the concrete ford is expected to have a more dramatic effect on altering critical habitat. Removing the concrete ford will (to an extent) alter the hydrology of the stream course and change local deposition and erosion points along the stream channel downstream from the crossing (2016 BPCG-DUA Removal Hydrology Report). This action will restore the Piru Creek stream course to a more natural condition which will continue to modify itself according to existing flow levels.

**Determinations**

**Arroyo toad (TEPS)**

The project **May Affect, but will Not Likely Adversely Affect** critical habitat for ARTOs. In the short term, there should be **No Effect** to critical habitat, while long-term effects of both the terrestrial infrastructure and concrete ford removal are expected to **Beneficially Affect** the species. Project implementation should result in more available sandy terraced areas along the stream which are desirable habitat characteristics for the species. Additionally, the removal of the campground and concrete ford would further limit the amount of disturbance to the species within the stream channel and upland habitats.

**California red-legged frog (TEPS)**

The project **May Affect, but will Not Likely Adversely Affect** critical habitat for CRLF. In the short term, there should be **No Effect** to critical habitat, while long-term effects of both the terrestrial infrastructure and concrete ford removal are expected to **Beneficially Affect** the species. Project implementation should increase the amount of available upland dispersal habitat, as well as restoring natural flow conditions to the stream channel.

**Southwestern willow flycatcher (TEPS)**

The project **May Affect, but will Not Likely Adversely Affect** critical habitat for SWFL. Some degree of modification of riparian shrub habitat is expected as Piru Creek reestablishes a natural stream course following the removal of the concrete ford, but this natural alteration is not expected to detrimentally impact critical habitat for the species. Any changes to habitat that occur will be more reflective of a natural dynamic system where alterations to the stream channel and riparian vegetation correspond to variation in stream flow.

**Northern California Legless Lizard (FSS)**

**Direct Effects**

There is a minor risk of northern California legless lizard (NCLL) individuals being injured or killed from project activities due to trampling by work crews and/or being inadvertently struck by heavy equipment during implementation. They are not known to occur in the area, so the risk of impact is considered relatively small compared to the long-term benefit to the species from infrastructure removal. There is also a minor risk that egg clutches could be trampled or unearthed during the performance of project activities.
Indirect Effects

Indirect effects of project activities on NCLL are (if they were to occur in the project area) expected to be related primarily to alterations in habitat occurring from the removal of the low-water crossing, and/or impairment in the species’ ability to use the habitat effectively due to chemical contamination. Leaks from heavy equipment (engine oil, transmission fluid, hydraulic fluid, etc.) are considered a minimal risk related to the long-term benefit of infrastructure removal. Resource protection measures incorporated into the Proposed Action contain direction for the containment of contaminants to protect wildlife habitat and water quality.

Determination

I have determined that activities related to the proposed action may affect individual NCLL, but are unlikely to result in a population trend that would lead to the listing of the species. The risk of injury/death to individual animals is considered minor. Training and education of work crews, and the implementation of resource protection measures can further alleviate any potential problems and prevent unwanted consequences to the species.

San Bernardino Ring-neck Snake (FSS)

Direct Effects

There is a minor risk of San Bernardino Ring-neck Snake (SBRS) individuals being injured or killed from project activities due to trampling by work crews and/or being inadvertently struck by heavy equipment during implementation. They are not known to occur in the area, so the risk of impact is considered relatively small compared to the long-term benefit to the species from infrastructure removal. There is also a minor risk that egg clutches could be trampled or unearthed during the performance of project activities.

Indirect Effects

Indirect effects of project activities on SBRS are (if they were to occur in the project area) expected to be related primarily to alterations in habitat occurring from the removal of the concrete ford, and/or impairment in the species’ ability to use the habitat effectively due to chemical contamination. Leaks from heavy equipment (engine oil, transmission fluid, hydraulic fluid, etc.) are considered a minimal risk related to the long-term benefit of infrastructure removal. Resource protection measures incorporated into the Proposed Action contain direction for the containment of contaminants to protect wildlife habitat and water quality.

Determination

I determined that project related activities may affect, but are unlikely to contribute to a population trend which would require listing the SBRS. The species is not known to occur in the project’s AOE, but risks of injury or displacement are considered minimal as the species is highly mobile. Risks will be further reduced through implementing resource protection measures for wildlife protections during implementation.
Two-striped Garter Snake (FSS)

Direct Effects
There is a minimal risk of direct incidental contact occurring between Two-stripe garter snakes (TSGS) and work crews/heavy equipment. TSGSs are highly mobile and capable of avoiding most situations where they might feel threatened by project activities. However, there is a remote probability that TSGS could inadvertently be trampled by workers or struck by heavy equipment. Work crews/heavy equipment might also unintentionally trample or unearth egg clutches, if nesting locations occur close to where project infrastructure is being removed.

Indirect Effects
Indirect effects of project activities on TSGS are expected to be related primarily to alterations in habitat occurring from the removal of the concrete ford, and/or impairment in the species’ ability to use the habitat effectively due to chemical contamination. Leaks from heavy equipment (engine oil, transmission fluid, hydraulic fluid etc.) are considered a minimal risk related to the long-term benefit of infrastructure removal. Resource protection measures have been incorporated into the Proposed Action and provide direction for the containment of contaminants to protect wildlife habitat and water quality.

Determination
I determined that project related activities may affect, but are unlikely to contribute to a population trend which would require listing the TSGS. Individuals of the species are known to occur in the project’s AOE, but risks of injury or displacement are minimal as the species is highly mobile and risks will be further reduced through implementing resource protection measures for wildlife protection.

Western Pond Turtle (FSS)

Direct Effects
There is a minor risk of direct incidental contact occurring between western pond turtles (WEPT) and work crews/heavy equipment, particularly while work occurs in the stream channel. Turtles moving over upland areas of stream/river terraces, or across the concrete ford may come in contact with work crews/heavy equipment and could inadvertently be trampled by workers or struck by heavy equipment. Work crews/heavy equipment might also unintentionally trample or unearth egg clutches, if nesting locations occur close to where project infrastructure is being removed.

Indirect Effects
Indirect effects of project activities on WEPT are expected to be related primarily to alterations in habitat occurring from the removal of the concrete ford, and/or impairment in the species’ ability to use the habitat effectively due to chemical contamination. Leaks from heavy equipment (engine oil, transmission fluid, hydraulic fluid etc.) are considered a minimal risk related to the long-term benefit of infrastructure removal. Resource protection measures have been incorporated into the Proposed Action and provide direction for the containment of contaminants to protect wildlife habitat and water quality.
Determination

I determined that during implementation project related activities may affect, but are unlikely to contribute to a population trend which would require listing the WEPT. The relative risk of individual turtles suffering trampling or injury due to project activities is considered minor. Turtles avoid human contact when possible, generally moving into escape habitat (deeper pools with a thick sediment layer) upon perceiving a threat. Due to their anatomy, they are well-protected against minor bumps resulting from unintentional physical contact. Risks of disturbance or injury can be further minimized through proper awareness training of work crews and utilizing resource protection measures during implementation. Following implementation, WEPT are expected to benefit from improved habitat conditions and the restoration of the stream channel to a more natural condition.

**Monarch butterfly (FSS)**

**Direct Effects**

The project may directly affect monarch butterflies through actions which would affect the distribution and/or density of milkweed plants. Activities that involve the cutting or disturbance of vegetation could reduce the amount of available habitat for the species and have a negative impact.

**Indirect Effects**

In addition to the direct effects of cutting/removing milkweed plants on the species, the loss of host plants may also affect individuals indirectly. Monarchs looking for host plants to lay eggs in areas where plants have been cut would be expected to incur higher energetic costs which might result in reduced breeding success in subsequent generations.

**Determination**

I determined that project related activities may affect, but are unlikely to contribute to a population trend which would warrant listing the Monarch butterfly. Although some risks exist for individual monarch butterflies, the loss of habitat specifically related to activities resulting from the Proposed Action can be minimized through resource protection measures, such as training work crews to recognize the species and their host plants, and avoid impacting individual butterflies or cutting host plants which would result in lost habitat.

The risks of larvae, adults or monarchs in the metamorphic state being trampled, or of habitat being damaged or removed is considered to be low. Factors driving species population dynamics (agricultural practices, drought conditions) are broad and considered outside the scope of this project.

**Arroyo chub (FSS)**

**Direct Effects**

This project is not expected to have any direct effects on the species, as arroyo chub are highly unlikely (≤1% probability) to have persisted in available habitats above the San Felicia dam. If the species were to occur in the project area, it is considered unlikely that they would be negatively impacted by project activities. Removal of the concrete ford
would involve a dewatering plan for working in the stream channel and would contain resource protection measures for protecting fish and wildlife resources while project implementation is occurring.

**Indirect Effects**

The species is not expected to be affected indirectly by project activities. Indirect effects of the project are not expected to extend downstream beyond Lake Piru. Arroyo chub are known to be present in portions of Santa Clara River, but populations occur outside the AOE for the broadest of the spatial scales (vicinity) used for analysis.

**Determination**

I have determined that activities related to the proposed action will not affect individual arroyo chub or result in a population trend that would lead to the listing of the species. In the long term, restoring the channel of Piru Creek to a more natural condition by removing the concrete ford is likely to improve habitat conditions in the stream, which would be relevant should a local population introduction occur in the future. Currently the species is not known to be present in Piru Creek above San Felicia dam, and has not been sighted on Piru Creek above Lake Piru since the dam was constructed. It is possible that they used this habitat historically, but they are believed to be extirpated from this portion of their range.

**Cumulative Effects Analysis**

Spatial limits for analysis were set at 3 different scales; site (14.35 ac), local (1 mile from the site centroid), and vicinity (1-10 miles from site centroid). Analysis was conducted at multiple scales to account for potential reasonable and foreseeable actions which may affect both federally-listed and FS Sensitive species. The temporal limits for analysis were constrained at 5 years before and following the completion of implementation. This time period was deemed adequate to encompass previously occurring actions and to evaluate the modification and recovery of the riparian corridor following the removal of the campground infrastructure and the concrete ford.

Cumulative effects were considered while evaluating each species to provide separate determinations on how they were expected to be affected by the considered actions. For federally-listed species, non-Forest Service reasonable and foreseeable actions were weighed in relation to how a species would be impacted directly and indirectly by BPCG-DUA removal. For most species (California condor, CRLF, LBVI and SWFL) this is an additional factor for consideration, but does not modify the thought process of the determination. For ARTOs, the cumulative effects of non-Forest Service actions further magnifies conservation concerns for the species along Piru Creek. In particular, water management practices along Piru Creek have resulted in dramatic habitat fragmentation and deterioration for the species, which makes it critical to proceed with caution.

Based on a thorough evaluation of the cumulative effects of project activities on FSS status wildlife species, no detrimental or beneficial effects are expected to occur. No significant impacts are expected to any of the five FSS species that may occur in the project area. Further, the resource protection measures and Best Management Practices incorporated into the Proposed Action should reduce any potential impacts to a negligible level.
Alternative 2 (No Action)

In the short term, for all TEPC species, the No Action alternative would be expected to have no impact on either populations or on critical habitat conditions. The No Action alternative represents the continuation of current conditions, including unauthorized actions which occur as a result of continued access to the site. No disturbance to the site would occur as the result of infrastructure removal and removal of the concrete ford.

In the long term, the No Action alternative has cumulative detrimental effects on both populations and critical habitat for different TEPC species, most prominently to ARTO. The continued presence of the concrete ford and the campground infrastructure has encouraged continued low-level usage of the campground as a recreational site. This continued unauthorized usage of the site places TEPC species at a continued risk of disturbance, which both increases risk of take occurring to the species, and of adverse modification to critical habitat. Additionally, under the No Action alternative, none of the long term benefits (discussed under the Proposed Action alternative) to both species populations and critical habitat would occur.

Migratory Bird Assessment

Of the 67 priority species which may occur on LPNF, 15 species could possibly be affected by project activities. Birds which could potentially be affected are allocated in the ground-nesting, ground-gleaning and shrub-nesting resource-use guilds (Ehrlich et al 1988).

The primary risk to migratory birds resulting from project activities occurs to incubating/brooding adults, eggs and nestlings during the reproductive process. Adult birds may be flushed off the nest during the incubation or brooding stages of reproduction, which could result in decreased reproductive success. Disturbed or damaged nests may result in mortality to either eggs or nestlings. Additionally, project activities may indirectly affect reproductive success through increased depredation resulting from scent trails or from loss of cover and concealment at the nest site due to vegetation removal.

Overall, the relative risk of individuals being injured/damaged or killed is considered low. The probability of nests being disturbed within the project’s site footprint is feasible (20-30%), but in most cases the incubating/ brooding adult will flush off the nest and return after the source of disturbance is gone. In such cases where a flushing adult is observed, work crews should efficiently complete project activities in the area and move on, in order to minimize detrimental effects to reproduction. The event of a nest actually being damaged/destroyed resulting in direct mortality is possible but unlikely (< 10%), and impacts to migratory birds at a population level is not considered a statistical possibility due to a series of unlikely events which would need to occur.

Foraging adult birds and fledglings (ground-gleaning birds) would typically move away from work crews and heavy equipment. Their response would be to either seek cover in nearby vegetation or to seek other available foraging habitat in the general project area. As infrastructure removal will occur in stages rather than simultaneously, total displacement of birds from foraging habitats within the project area is considered
unlikely. The event of individuals suffering injury or mortality as a result of project activities is considered possible but unlikely (< 10%), and the probability of birds being affected at a population level is considered a statistical impossibility as project activities would only affect a fraction of the total population.

Resource protection measures for project implementation are listed on page 5 of the EA and are designed into the Proposed Action to reduce potential impacts to migratory birds.

**Management Indicator Species**

The management indicator species (MIS) whose habitat would be either directly or indirectly affected by the BPCG-DUA removal project are carried forward in this analysis, which will evaluate the direct and indirect effects of the Proposed Action alternative on the habitat of these MIS. Mountain lion (fragmentation), arroyo toad (aquatic habitat), and song sparrow (riparian habitat) may be potentially affected by project activities.

**Mountain lion (Fragmentation)**

Project actions may directly or indirectly affect individual mountain lions in proximity to the project area, but are not expected to have any effect on the species at a population level. Individuals may be displaced by noise from heavy machinery within the project area during implementation, but any energetic costs are predicted to be negligible for a wide-ranging species. The species could be affected indirectly through ingestion of contaminants, resulting from fluid leaks from heavy equipment. However the chance of this occurring are extremely low, as project resource protection measures include protocols for containing and removing spills if they should occur.

**Arroyo toad (Aquatic habitats)**

The ARTO is also federally protected as an endangered species and project impacts to ARTOs are discussed in greater detail in the BA/BE (Lieske 2014). Project activities may affect ARTOs both directly or indirectly, as they are known to occur and breed both upstream and downstream of the concrete ford and also occasionally occur in the upland areas of the campground where the majority of the infrastructure (roads, campsites and structures) are located.

Because heavy equipment will be utilized to remove the campground and concrete ford there is potential that toads may be impacted directly by being run over by heavy equipment or trampled by work crew personnel on the ground. Work in the stream channel on the concrete ford may directly affect tadpoles, juveniles or adults. However, resource protection measures are incorporated into project implementation to minimize impacts to ARTOs and other wildlife to the greatest extent possible. These impact avoidance criteria include measures for conducting pre-work surveys, having biological monitors on-site (if necessary), conducting implementation during late-season (autumn) and dewatering the channel during in-stream work.

The project may affect ARTOs indirectly by altering their habitat (temporarily) which would impair their ability to utilize it effectively, or through chemical-related spills (hydraulic fluid, transmission fluid etc.) from heavy equipment. Any negative impacts to ARTO habitat are expected to be very minimal and temporary in nature. Long-term
expectations are that the project will be beneficial to ARTOs, projecting an increase in ARTO habitat quality and quantity resulting from the campground and concrete ford removal.

**Song sparrow (Riparian habitats)**

Project actions may directly or indirectly affect individuals of the species within the project area. Only project actions occurring within the riparian vegetation are likely to affect the species directly, as suitable habitat for song sparrows does not extend into chaparral vegetation. Indirect effects may include noise disturbance or alteration in shrub vegetation resulting from removal of the concrete ford. Any impacts, either direct or indirect are expected to be localized and minimal. Impacts which would alter the current population trend for the species are expected to be impossible given the scope of the project. Further, the project incorporates resource protection measures, including late-season implementation to avoid impacts to breeding birds, as additional measures of protection for the species.

**Hydrology**

Direct and indirect effects analyses for the project are limited to Forest Service lands within the boundaries of the BPCG-DUA. Cumulative effects analyses are constrained to the 6th field subwatershed (HUC-12) in this area. Long-term effects are evaluated in the Cumulative Watershed Effects (CWE) analysis for a period of 30 years, after which the land and hydrology is assumed to have recovered to levels similar to if no treatments were implemented. Shorter-term cumulative effects are assessed for one, five, and ten years post-action.

**Alternative 1 (Proposed Action)**

**Water Quality**

Soil disturbance would occur on the approximately 20 acres of project area during decommissioning activities, including removal of campsite facilities, ripping of chip seal, and removal and re-contouring of the concrete ford. There is a slight chance that the proposed action could have a minor, short-term impact to water quality due to loss of soil cover, disturbance to active stream channels, increased risk of erosion, and heavy equipment usage.

The use of heavy equipment is expected to cause minor, short-term disturbance and slightly increase the potential for local-to-the-site accelerated erosion and sedimentation from destabilization of shorelines, vegetation and ground cover removal, and soil exposure or compaction. In addition, heavy equipment has potential for contamination of the surface water from vehicle fluids. The risk of disturbance these activities will be reduced by using the appropriate techniques adapted to site conditions.

In addition to the temporary reduction of soil cover, fuel and other liquids from heavy equipment operation, and transportation of waste materials from the site have the potential to effect water quality. Temporary flow diversion around the concrete ford removal site would be needed, which would potentially increase turbidity directly downstream of the project area.
In the long-term, local water quality at the site would not be affected. It is possible there could be a slight improvement, as removing the campground and day use facilities would reduce areas of accelerated runoff once these areas have revegetated naturally. Additionally, removal of the outhouses would prevent future use and possible risk to water quality.

**Channel Morphology and Riparian areas**

Channel morphology in the long term should improve with the removal of the concrete ford and rip-rap banks, which would provide for more natural meandering within the narrow floodplain, lateral erosion of banks, and deposition of fine sediments during high flow events. This would also allow point bars to redevelop within the artificially flat channel bottom that is currently occupied by the concrete ford. It is expected that there would be some channel adjustment in the vicinity of the concrete ford from about one-to-three years after removal.

Over the long term, implementing the proposed action with the addition of BMPs and resource protection measures would have the local beneficial effects of restoring riparian vegetation at the water crossing and along the banks that are currently covered in riprap and chip sealed surfaces, and creation of more diverse, natural in-channel morphologic features that aquatic species use as habitat, such as point bars and pools.

**Streamflow**

Removal of hardened concrete structures and decommissioning of the campground loops by breaking up chip seal would increase local infiltration and reduce excess runoff from impermeable surfaces. In the long term, removal of the concrete ford and campground infrastructure is not expected to significantly change peak or base flows, though removing the concrete ford would eliminate any artificial backwater upstream of the structure and allow the stream channel to flow more freely through this reach.

**Soils**

Within the project area, heavy equipment use could potentially create ruts in soil or cause soil displacement, especially where turning of heavy equipment results in churning of soil. Soil compaction would also have the indirect effect of impeding vegetative regrowth by reducing the transfer of water and oxygen to plant roots. To minimize the extent and depth of compaction, resource protection measures would limit equipment operation to dry or slightly moist soil only. Additionally, mechanical equipment would primarily be restricted to the existing chip seal loop during removal of the campground facilities, including camp stoves and grills, picnic benches, and restrooms, prior to loop road decommissioning, which would limit compaction. Resource protection measures require decommissioning the chip seal campground loops by ripping to at least 6 to 8 inches deep. De-compacting the top 8 inches will allow vegetation to regrow. If ripping does not reach 12 inches, root growth would help to de-compact deeper soil within 5 to 10 years. Some plant regrowth is currently occurring within the campground loop and is helping break up the chip seal. Ripping the remaining chip seal will help facilitate the recovery process.

While the erosion hazard rating for the soils within the project area is high, risk of erosion is expected to be relatively low as the hillslope gradient within most of the
disturbed areas is very gradual, and BMPs and resource protection measures would be
implemented to further reduce this risk.

**Cumulative Watershed Effects**

The cumulative effects boundary for water quality and stream hydrology is the Lake Piru – Piru Creek subwatershed, which covers 34,810 acres. Wildfire is one of the main disturbances within this subwatershed. Typically, erosion returns to near background levels within 10 years of a fire. Most erosion from wildfire usually occurs within three-to-six years post-fire (Berg and Azuma 2010). However, the cumulative effects model indicates some larger fires more than 10 years ago may have some lingering effects, including the 2003 Piru Fire that burned 6,746 acres, or 19% of the subwatershed (63,726 acres in total). So these are included within the model. Other large wildfires of note that have burned portions of the Lake Piru subwatershed include the 2006 Day Fire and 2007 Ranch Fire. The 58,000 acre Ranch Fire directly burned through the project area, and some erosion and sediment movement within the campground site is evident. Debris fans from adjacent hillslopes have partially covered portions of the chip seal campground loops.

Grazing does occur within the watershed, though not in the vicinity of the project area. There are two allotments with several management units, though only one, the Temescal Allotment, is active. This includes the Reasoner and Rodeo Flats Units (pastures) within the Temescal Allotment. The Piru and Potholes Allotments are currently vacant. Roads cover approximately 1.2 miles per square mile of the subwatershed and trail density is approximately 0.1 miles per square mile. Two parcels of private land of approximately 210 acres total are located 0.15 mile to the north and upstream of the project area and are accessed by private landowners.

Equivalent Roaded Acres (ERA) modeling shows the Lake Piru – Piru Creek subwatershed is under threshold for cumulative effects, even with implementation of the proposed action. Over time, the ERA value is expected to decrease and remain below threshold with most future foreseeable activities, though unexpected disturbance events, such as large high-severity wildfires, may occur and would increase ERA.

**Cumulative Effects - Soil**

The cumulative effects boundary for soil quality includes the 20 acre project area. Additional activities, both past and present are very minimal and no additional future actions are planned for this area.

Other than project implementation, no major projects are currently planned along the access route, Forest Service road 4N13.3, within the project area. Major road maintenance is not expected, but repairs or debris removal may occur due to slope movement and mass wasting from storm events.

Dispersed recreation is low within the project area. Forest Service road 4N13.3 has a locked gate about 3 miles south of the project area that excludes most motorized vehicle use. It is expected vegetation would return to disturbed areas within approximately two-to-three years. Some occasional recreational foot or bicycle traffic could have minor short-term effects to project area soil, though it is not expected to be significant, and it is unlikely that trails would form due to soil compaction.
Illegal OHV activity is not expected because opportunities are very limited within the project area due to topography and limited motorized access. There are no illegal or developed OHV routes adjacent to the project area and potential illegal OHV use would be limited to existing roads. According to the resource protection measures incorporated into the Proposed Action, no temporary roads will be constructed, and BMP 2.7 for road decommissioning, regarding blocking vehicle access to prevent motorized traffic, would deter illegal OHV use. The return of vegetation would be delayed if illegal OHV use occurs due to ineffectively blocking of the road. This would result in soil compaction and erosion until the roads are properly decommissioned.

**Summary of Effects**

The Proposed Action is not expected to adversely affect hydrologic resources because of the following factors: the limited scope and small size of the project area, the long-term local beneficial effects of a more naturally free-flowing stream channel in the vicinity of the crossing, and implementation of BMPs to mitigate risk of short-term effects to hydrologic resources from project implementation. ERA values for both the Proposed Action and No Action alternatives would remain below threshold of concern for cumulative effects.

The Proposed Action (Alternative 1) complies with the Clean Water Act through use of BMPs designed to minimize or prevent the discharge of both point and non-point source pollutants from forest roads and activities, as well as with forest and national plan standards, guidelines and goals listed in the BPCG-DUA Hydrology Report (Blaschak/Immecker, 2017).

**Alternative 2 (No Action)**

Under the No Action alternative, the campground, day use area, and all associated infrastructure would not be decommissioned, including the campground spur roads, concrete ford, and rip-rap.

There are no direct effects of choosing the No Action alternative. Indirect effects include continued unauthorized use of the campground, which would perpetuate compaction and bare soils at the closed recreation site. At the concrete ford, fine sediments would continue to aggrade upstream, degrading in-channel morphology and local water quality. ERA values for the Lake Piru – Piru Creek subwatershed are currently below threshold and further recovery from past actions and wildfires is anticipated to continue. The No Action alternative would not contribute to ERA values, and cumulative effects would not be expected.

The No Action alternative does not comply with Executive Order 11988 because it does not avoid impacts associated with the occupancy of the floodplain, since the concrete ford would remain under this alternative and continue to impact the active channel of Piru Creek and associated riparian area. The No Action alternative does not improve watershed and riparian conditions and move the area toward desired conditions identified in Forest Plan goals 5.1 and 5.2. It is not consistent with watershed function (WAT1) and management (WAT2) program strategies because hydrologic function and water quality would not be protected. The No Action alternative may not support the existing beneficial
use of aquatic organism habitat with the continued degradation of habitat in the vicinity of the concrete ford.

## Botany

There are no known occurrences of Threatened, Endangered, Proposed, or Sensitive plant species within the project area. Marginal potential habitat for Forest Service Sensitive *Calochortus clavatus* var. *gracilis* and *Calochortus fimbriatus* exists, though no plants were found when selected areas with suitable habitat were surveyed.

### Alternative 1 (Proposed Action)

#### Direct Effects

This project proposed action could have a short-term direct effect on any sensitive plants present while facilities and pavement are being removed. Any additional use, improvement, or maintenance of Forest Service road 4N13.3 for purposes of the project could have direct effects on sensitive plant individuals present along the road. However, once the work is completed, there will be no continuing or ongoing impact on the project site itself since the area will no longer be easily accessed by the public or the Forest Service. No further action is planned in the project area by the Forest Service other than normal use and maintenance of Forest Service road 4N13.3. *Calochortus clavatus* var. *gracilis* or *Calochortus fimbriatus* could potentially occur within the project area and if so, could be trampled or damaged by project activities or road use and maintenance. This would result in a short-term direct effect to any individuals present. The risk of these direct effects could be reduced by limiting work to the time of year when the plants are dormant and above ground parts are not present.

#### Indirect Effects

Indirect effects could result from the introduction of non-native invasive plants. The amount of disturbed and open soil created by project activities could promote the introduction of these plants. Invasive plants could compete with any sensitive plants present and impact the population.

#### Cumulative Effects

Cumulative effects will occur within the lower Piru Watershed. This watershed encompasses about 53,400 acres on the Los Padres National Forest. Currently a FERC relicensing project is taking place in the watershed for the Pyramid Lake hydropower station and other related facilities. This license will be issued for a time period of between 20 and 50 years. Activities related to operation of the power station including releases of water downstream to Lake Piru could affect any sensitive plants that may be present and within the area affected by the releases. Some of the study plans proposed for this relicensing process could occur in the reach of Piru Creek between Pyramid Lake and Lake Piru. Any study plan activities taking place in the BPCG-DUA location, which is along this reach, could have an effect on any sensitive plants present for the two to three years of study plan activities. Other effects could occur from occasional visits by passing hikers, hunters, or bicyclists who trample or damage any sensitive plants present in the BPCG-DUA project area. These effects will be ongoing without time limit. Continued
use and maintenance of Forest Service road 4N13.3 will have continued effects on any sensitive plants that might be located along the road where it passes through the project area. Two grazing allotments, Piru and the Potholes Lisk Unit, occur in close proximity to the project site. If any cattle escape these allotments, they could trample, eat, or damage any above ground parts of any sensitive plants present in the project location. This potential effect would only occur if the allotments are active, and currently they are not.

**Determination**

The Proposed Action alternative to decommission BPCG-DUA may affect individuals, but is not likely to result in a trend toward Federal listing or loss of viability for *Calochortus clavatus* var. *gracilis* or *Calochortus fimbriatus*.

**Alternative 2 (No Action)**

Under this alternative, there would be no direct, indirect, or cumulative effects on FSS plants due to project activities. Continued long-term unofficial use of existing facilities by the public may result in some direct effects to potential habitat by concentrating activities in the area of the campground.

**Noxious Weeds**

The Proposed Action would result in a low risk that noxious weeds would be introduced and/or spread in the project area. Measures have been incorporated into the alternative to reduce risk. Once native vegetation begins to reestablish, the noxious weed infestations should be reduced.

Under the No Action alternative, there would be lower risk of noxious weed introduction or expansion. The lack of new ground disturbance would minimize conditions that tend to favor noxious invasive weeds under the Proposed Action alternative.

**Recreation/Visual Resources**

The Interdisciplinary Team took numerous field trips to the project area from 2013 to 2016. An area of concern was the short stretch of Piru Creek (Segment 7) within the project area that is eligible for designation as a Wild and Scenic River. The proposed action was also analyzed with respect to the potential impacts on recreation and visual resources, including recreation use.

**Spatial and Temporal Context for Effects Analysis**

For the purpose of this analysis, short-term is defined as immediate treatment up to three years and long-term is defined as three to ten years after project completion.

**Past, Present, and Foreseeable Activities Relevant to Cumulative Effects Analysis**

The area currently receives a light amount of recreation use. This is mainly in the form of hikers and backpackers hiking through to access the Agua Blanca Trail or to continue cross-country travel further north up Piru Creek. The area also receives some seasonal use by hunters. Two parcels of private land are located north of the BPCG-DUA.
Landowners drive along Forest Service road 4N13.3 to access their land. Ongoing road and trail maintenance will occur in the foreseeable future.

**Alternative 1 (Proposed Action)**

**Direct Effects**

Removing the specified improvements and reshaping the land form to be more natural will reduce barriers or tripping hazards, and improve free and easy public access through the area, including attractive streamside areas and adjacent woodlands. The removal of improvements will also result in a more primitive and natural appearing landscape visually due to the lack of constructed features that currently dot the landscape in this area. The reshaping of the land form after removal of improvements will help the former campground become naturally revegetated and eventually blend into the surrounding forest land. Removal of the concrete ford in Piru Creek will have a positive effect by perpetuating the free-flowing condition of the creek under Wild and Scenic River management guidelines. As noted above in the hydrology section, the Proposed Action would have no effect on long-term water quality, with the possibility of a slight improvement. Dispersed recreationists will not be allowed to access the area for a temporary period of time until project completion. This is expected to be a minor impact as few dispersed recreationists use this area. As the campground has been closed since 2000, there have been no future development plans to reopen the campground. As a result, there is no impact to developed recreation opportunities from the Proposed Action.

**Indirect Effects**

The area, including access to Agua Blanca Trail will be closed to the public during implementation of the project. This is for public safety reasons to keep the public out of the project area during decommission work. Recreationists will be advised of the closure which will be in place three to four months starting in late summer while the proposed decommissioning work is taking place. The SIO may temporarily drop from High to Moderate and the Semi-Primitive Non-Motorized Recreation Opportunity Spectrum (ROS) class may be affected by the increase of on-site controls and restrictions during and for a period of time after implementation. As the area starts to return to a natural state, there will be temporary impacts to the overall forest experience of recreationists until the impacts of the removal of improvements disappear and are no longer evident. These temporary short-term impacts will be in the form of freshly shaped landforms devoid of vegetation that mimic natural contours. Scenery within the immediate vicinity and the natural free-flowing condition of the creek will be improved.

**Cumulative Effects**

Other activities being studied in Piru Canyon include a proposed reroute of the southern half of the Pothole Trail (18W04) and a related action of creating a permanent trailhead facility to serve the Pothole and Agua Blanca Trails users. The latter is a project being planned by United Water Conservation District and would be situated on lands owned and administered by them. These two projects, both approximately two miles south of Blue Point Campground, are not expected to have recreation related effects that will overlap with the proposed action. Another study under review is to survey trail conditions and evaluate trail restoration actions on the Agua Blanca trail. If the survey moves
forward, it may have a slight impact on the dispersed recreation experience on the trail while the survey is taking place. Although, the impact would be low and limited to a short duration, it may overlap in time with implementation of the proposed action and result in an incremental cumulative effect. Long-term, ongoing trail maintenance will occur into the foreseeable future.

The project will improve and benefit the visual resources in the project vicinity. Overall, the project will have a lasting and meaningful positive cumulative impact on recreation, and visual resources. The project will benefit dispersed recreation by allowing unrestricted access across the land form and to streamside areas that are currently impeded by walking through and around improvements, many of which are in a poor, charred condition.

**Alternative 2 (No Action)**

There will be no resource protection measures associated with this alternative as everything will remain status quo. Under this alternative, there would be no change to the current condition of the project area.

Alternative 2 would result in overall short- and long-term negative effects on recreation and visual resources as the improvements fall further into disrepair. Similarly, the SIO will be reduced to Moderate (moderately altered) as time goes on and the improvements fall into further disrepair. The Semi-Primitive Non-Motorized ROS class will be affected as the man-made improvements are not natural appearing and do not harmonize with the natural environment. The improvements would negatively influence the experience of forest recreationists and would create safety hazards hidden in the tall vegetation.

**Inventoried Roadless Areas**

**Special Designation Area**

A small portion of the project area is within an inventoried roadless area (IRA) known as the Sespe-Frazier IRA. IRAs were created in two national efforts in the 1970s to analyze and map roadless areas for possible inclusion into the National Wilderness Preservation System. Remnants of these early studies remain in effect as non-contiguous IRA pieces following the establishment of the Sespe Wilderness in 1992.

While BPCG-DUA predate establishment of inventoried roadless areas, some of the facilities are located within the Sespe-Frazier IRA. The campground has been in existence since 1948 and occupies 20 acres known as the project area. The overlap between the project boundary and the IRA boundary occurs in the eastern half of the easternmost loop of the campground road and extends south. Facilities included in this area of overlap are a portion of the campground loop road, six campsites, one restroom, one footbridge, one water well, and buried water distribution line. This area within the IRA is approximately four acres in size. These non-contiguous areas are pieces of the Sespe-Frazier IRA. Area 5 of this IRA flanks the campground boundary on the west. Area 6 is the polygon that runs down the east side of the campground and intersects the project boundary as described above.
It is quite likely that including a portion of the campground within the IRA boundary was a mapping oversight. The Final Environmental Impact Statement of the LMP Amendment describes the Area 6 IRA boundary as “just east of Blue Point Campground.” Therefore it appears the intent was to exclude the campground from the IRA. Nonetheless, any impacts of the proposal on IRA characteristics have been evaluated.

The roadless area conservation rule was adopted by the Department of Agriculture to protect and conserve roadless areas on National Forest System lands. The rule prohibits road construction and reconstruction in IRAs. It also prohibits timber cutting, sale, or removal in IRAs.

There are nine values or features that often characterize inventoried roadless areas. These include:

- High quality or undisturbed soil, water, and air;
- Sources of public drinking water;
- Diversity of plant and animal communities;
- Habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land;
- Primitive, semi-primitive non-motorized and semi-primitive motorized classes of dispersed recreation;
- Reference landscapes;
- Natural appearing landscapes with high scenic quality;
- Traditional cultural properties and sacred sites; and
- Other locally identified unique characteristics.

**Direct and indirect effects**

**Alternative 1 (Proposed Action)**

The proposed activities are in compliance with the roadless area conservation rule. All project work is limited to existing roads and existing developed areas. Activities will not result in any new roads. No trees will be cut as a result of the proposed activities.

Effect to IRA characteristics: The proposed activities will be supportive of IRA characteristics, as they will return the area to a natural appearing landscape by removing campground improvements. To put the scale of this project in perspective, the improvements being proposed for removal are situated on four acres of NFS within the IRA, and this Area 6 of the IRA contains 868 acres.

The process of returning the campground loop road to a natural appearing landscape will improve drainage and prevent future resource damage from erosion. This will also help preserve the IRA characteristics of the area. The removal of the other listed improvements will likewise preserve the IRA characteristics.

The net effect of the Proposed Action would be to leave this small section of the IRA in a more pristine condition as it helps preserve the IRA characteristics.
Alternative 2 (No Action)

This alternative is in compliance with the roadless area conservation rule, as no road construction, road reconstruction, or timber cutting would occur.

The campground is part of the baseline condition of the IRA. Since closure, and with less use and facility maintenance, the campground is in the slow process of being reclaimed by natural processes, including vegetation growth and distribution. However, there will continue to be evidence of development associated with the remnant facilities and infrastructure. And hydrological processes will continue to impact the area. In sum, this alternative would not improve the stated IRA characteristics.

Cultural Resources

The Area of Potential Effect (APE) for this project was established to facilitate consideration of both direct and indirect effects on cultural resources from the undertaking, as required by 36 CFR 800, which defines an APE as “the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any properties exist. The [APE] is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking” (36 CFR 800.16(d)). For this project, the APE is defined as the entirety of the BPCG-DUA and areas immediately adjacent to the campground accessible by vehicles.

Potential effects of ground disturbing activities may not be limited to physical damage of tangible and visible artifacts. Soil disturbing activities may modify the horizontal distribution of artifacts; obscuring patterns existing in their original deposition, and eventually introduce new trends in their arrangement. Potential impacts to cultural resources include: artifact breakage, introduction of non-cultural elements, and alteration of horizontal and vertical distribution of cultural materials through deflation, compaction, and erosion of soils.

Alternative 1 (Proposed Action)

One known cultural resources has been identified within the project’s APE. All site information and locations are protected under the Freedom of Information Act and is available to appropriate Forest Service personnel by Heritage Resource staff. Cultural resource protection measures are required to avoid adverse effects to the historic property within the project’s Area of Potential Effects (APE), and have been incorporated into the Proposed Action. Exclusionary fencing or flagging shall be installed prior to the commencement of work activities. A pre-work meeting between the South Zone Archaeologist, Forest Service Officer in Charge, and the project site manager is recommended to ensure adequate steps are taken to clearly delineate the area of avoidance to ensure no adverse effects on the historic property.

Alternative 2 (No Action)

Under the No Action alternative, current management plans would continue to guide management of the project area. No changes would be implemented to accomplish forest goals and objectives. The campground and day use area would remain closed on a year-
round basis and continue to fall into further disrepair. The concrete ford and rip-rap revetment would remain and continue to alter the natural flow and hydrological function of Piru Creek. The existing partially burned restrooms, picnic tables and associated structures would remain, and continue to act as an “attractive nuisance” and safety hazard to the public. These attractive nuisances, if left in place may encourage an adverse effect to the historic property as public visitation and associated activity will be higher if the Proposed Action is not carried out increasing the chance of vandalism to the site.

CONSULTATION AND COORDINATION

The Forest Service consulted the following individuals, Federal, State, and local agencies, tribes and non-Forest Service persons during the development of this environmental assessment:

**ID TEAM MEMBERS:**

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Steven Galbraith – South Zone Archeologist
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Pete Zavalla – Forest Tribal Liaison
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Charlie Robinson – District Recreation Officer

**FEDERAL, STATE, AND LOCAL AGENCIES:**

US Fish and Wildlife Service
California Department of Fish & Wildlife
United Water Conservation District
US Army Corps of Engineers
California Department of Water Resources
Pyramid Lake Dam
Los Angeles Regional Water Quality Control Board

**TRIBES:**

Barbarano Venturano Band of Mission Indians
Tataviam Band of Mission Indians
OTHERS:

Interested public