



Draft Environmental Assessment

Tubbs Hill Hazardous Fuel Reduction Project

City of Coeur d'Alene, Idaho

FEMA-1781-DR-ID

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FEMA

U.S. Department of Homeland Security

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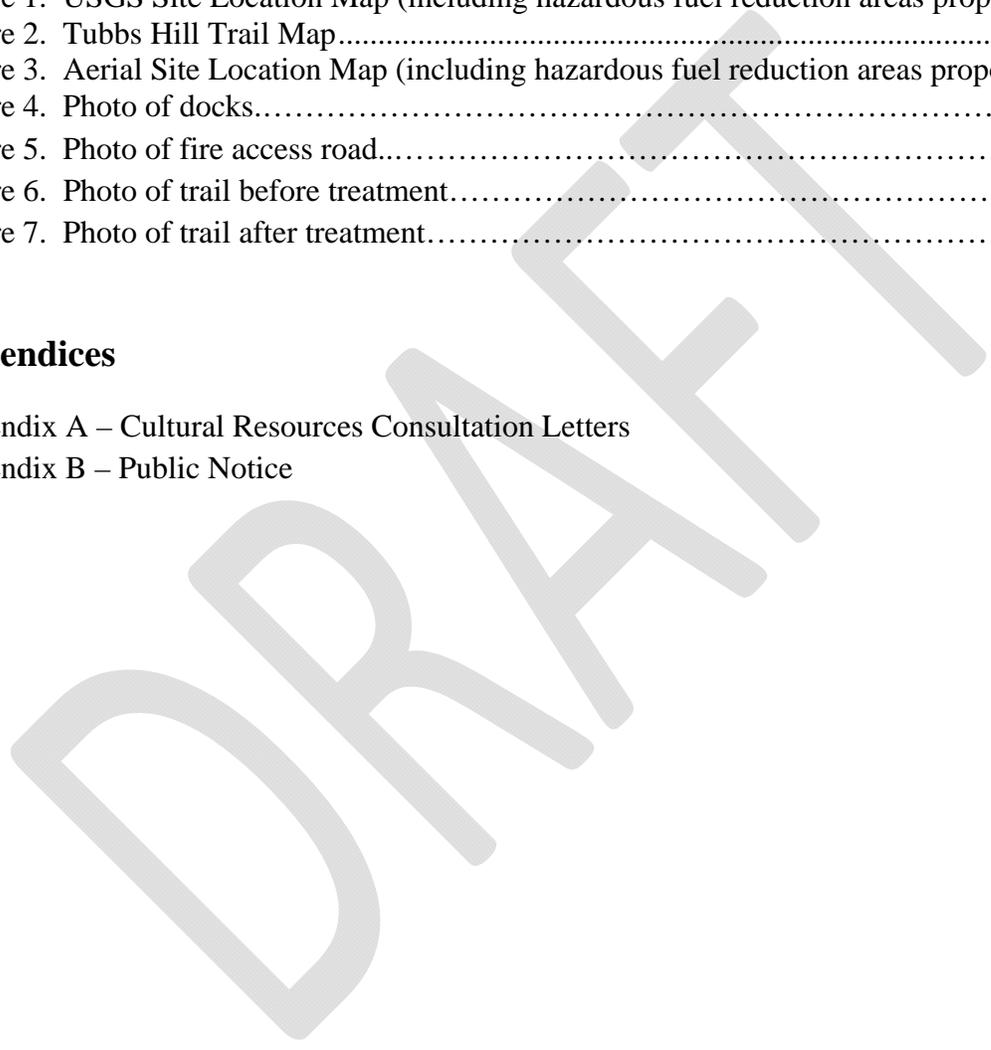
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LIST OF ACRONYMS

APE	Area of Potential Effects
BMPs	Best Management Practices
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CWA	Clean Water Act
EA	Environmental Assessment
EFH	Essential Fish Habitat
EO	Executive Order
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
FPPA	Farmland Protection Policy Act
FONSI	Finding of No Significant Impact
FWCA	Fish and Wildlife Coordination Act
HMGP	Hazard Mitigation Grant Program
IDFG	Idaho Department of Fish and Game
MSA	Magnuson-Stevens Fishery Conservation and Management Act
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NRHP	National Register of Historic Places
OHWM	Ordinary High Water Mark
SHPO	State Historic Preservation Office/Officer
USFS	U.S. Forest Service
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey

1.0 INTRODUCTION

The City of Coeur d'Alene (City) has applied through the Idaho Bureau of Homeland Security to the U.S. Department of Homeland Security's Federal Emergency Management Agency (FEMA) for funding assistance with a wildfire fuel load reduction project for Tubbs Hill City Park. FEMA is proposing to fund 75 percent of the cost for this project through its Hazard Mitigation Grant Program (HMGP), with the remainder coming from the City or other non-federal sources. The Tubbs Hill hazardous fuel reduction project will reduce risk from wildfires to people and property within and adjacent to the 120-acre natural area located next to downtown Coeur d'Alene.

The Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1973 (Stafford Act), as amended, provides federal assistance programs for both public and private losses sustained in disasters. FEMA's HMGP provides grants to states, local governments, and Indian tribes for long-term hazard mitigation projects. This project is authorized under a major disaster declared by the President on July 31, 2008, for flooding that occurred from May 15 to June 9, 2008 (FEMA-1781-DR-ID). The HMGP is authorized under Section 404 of the Stafford Act.

1.1 Authority and Jurisdiction

The National Environmental Policy Act (NEPA) of 1969 requires that Federal agencies evaluate the environmental impacts of their proposed actions and the natural and human environment before deciding to fund an action. The President's Council on Environmental Quality (CEQ) has developed a series of regulations for implementing NEPA. These regulations are included in Title 40 of the Code of Federal Regulations (CFR), Parts 1500–1508. They require the preparation of an Environmental Assessment (EA) that includes an evaluation of alternative means of addressing the purpose and need for a federal action and a discussion of the potential environmental impacts of the proposed federal action. An EA provides the evidence and analysis to determine whether the proposed federal action will have a significant adverse effect on the human environment.

An EA related to a FEMA program must be prepared according to the requirements of the Stafford Act and 44 CFR, Part 10. This section of the federal code requires that FEMA takes environmental considerations into account when authorizing funding or approving actions. This draft EA was conducted in accordance with both CEQ and FEMA regulations for NEPA. The purpose of this EA is to meet FEMA's responsibilities under NEPA and to determine whether to prepare a Finding of No Significant Impact (FONSI) or a Notice of Intent to prepare an Environmental Impact Statement for the proposed project. This EA was prepared with information in the grant application and provided by resource agencies, and from a September 2010 site visit.

2.0 PURPOSE AND NEED

The purpose of the HMGP is to reduce the loss of life and property in future disasters by funding cost-effective mitigation measures during the recovery phase of a natural disaster. The purpose

of this project is to provide funding to the City for wildfire mitigation activities in Tubbs Hill. The hill is a timbered park that creates a unique fire problem for the City fire department due to the proximity of the park to neighboring homes and the volume of public traffic by park users. The factors that affect fire severity and suppression include available fuels, environmental conditions, and suppression response time. Since environmental conditions cannot be controlled, management recommendations focus on fuel levels and suppression strategies.

The City has determined there is a need to address the vegetative fuel load that has been increasing along western portions of the trail system and shoreline of the park. The risk of a devastating fire due to natural (lightning) or human related causes (fireworks, escaped campfires, cigarettes, or intentional setting) in the park and urban interface could cause serious damage or destroy property in the park, to adjacent homes close to the hill, and to the adjacent downtown area by the next wildfire. Houses and other private structures that are on or immediately adjacent to Tubbs Hill are of particular concern, as there is a general lack of sufficient buffer zones between many of the structures and Tubbs Hill vegetation. A fire on Tubbs Hill could threaten the structures. Conversely, a structure fire could threaten Tubbs Hill. Since the only conditions of wildfire that can be managed for fuel loads and suppression response time, reduction of fuels is very important.

3.0 LOCATION AND BACKGROUND

3.1 Site Location

Tubbs Hill is located immediately adjacent to downtown Coeur d'Alene in Kootenai County. Tubbs Hill can be identified as all of the land elevated above McEuen Field to the north, 11th Street on the northeast, and Lake Coeur d'Alene on the east, west, and south sides. The action is proposed in the west side of the park, which receives the most use and includes portions of a two-mile loop trail, smaller use trails, and a fire access road. The legal description is Township 50 North, Range 4 West, Section 24, and Latitude 47.67° North, Longitude -116.78° West. Figure 1 shows the location of the project area.

3.2 Background

Tubbs Hill is a 120-acre natural area. Recreational use of Tubbs Hill consists of hikers, joggers, swimmers, photographers, beach users, and boaters. As a public area in the heart of downtown, Tubbs Hill has been a central element in the history of the City. The primary goal for the management of Tubbs Hill is to provide the public with safe opportunities for use while retaining the natural setting.

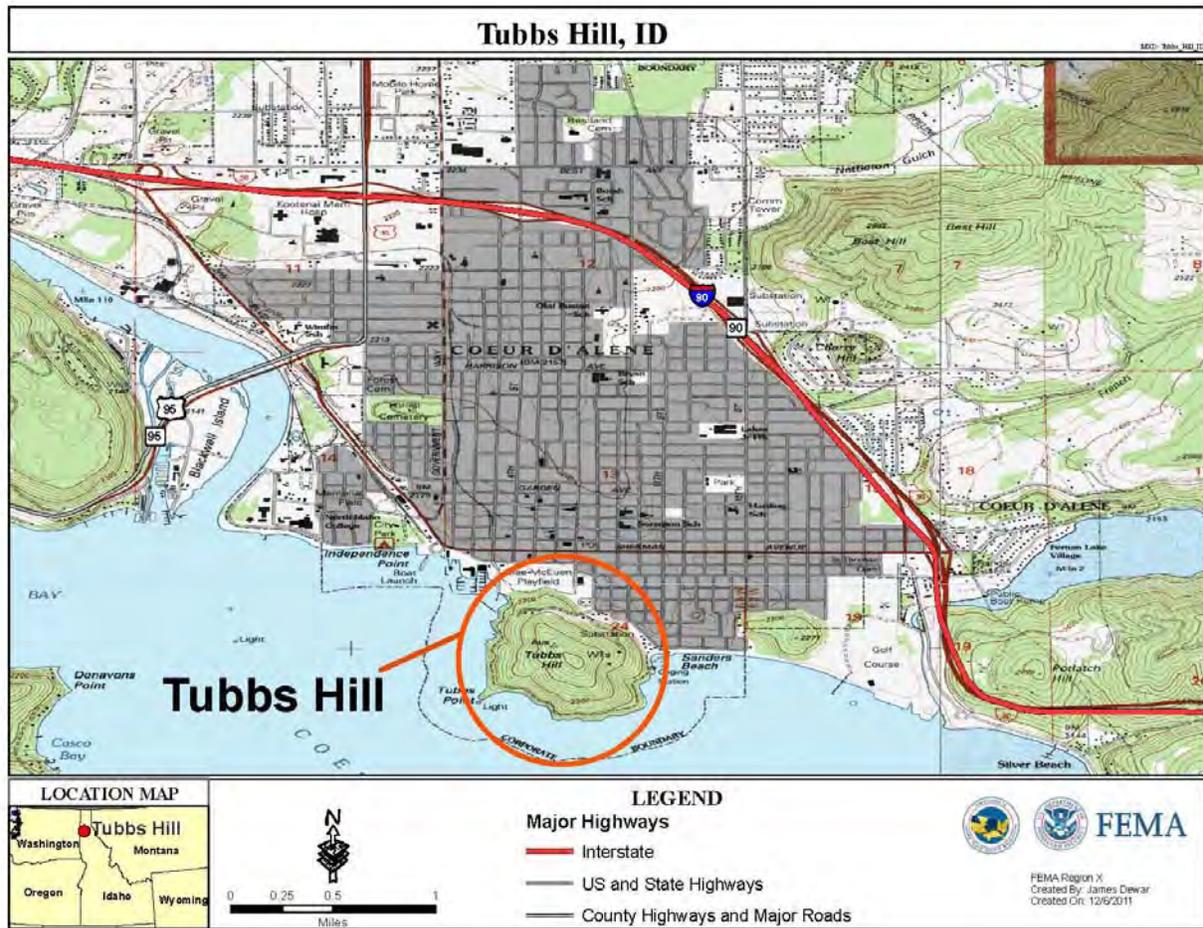


Figure 1. USGS Site Location Map (including hazardous fuel reduction areas proposed)

The City acquired what is now known as Tubbs Hill through a series of purchases that began in 1936, with the final remaining parcel acquired in 1976. The park includes over four miles of primary, interconnecting trails that feature scenic viewpoints, woodland habitats, and historical focal points, along with other smaller secondary trails and an unpaved fire access road. A two-mile loop trail circles the hill and follows the lakeshore. The fire road is approximately one mile long and sufficient for use by 4-wheel drive brush fire vehicles and is gated to prevent access by unauthorized vehicles.

The trail system was originally designed by volunteer U.S. Forest Service (USFS) employees and constructed by a Young Adult Conservation Corps group that was financed and supervised by the local Bureau of Land Management office. In 1987 an interpretive trail program was implemented for Tubbs Hill, with numbered markers which correspond to a guide depicting natural and historical resources. Figure 2 below shows the trail map used for the park. A current guide brochure that includes the map is available at City Hall, the City Parks Department, and some local businesses.



Figure 2. Tubbs Hill Trail Map

There is private property remaining within the public property on the hill, with five residences located on the south side of Pine Avenue west of 8th Street. This extension of Pine Avenue is also known as Tubbs Hill Road. Additional homes and properties adjoin the north edge of Tubbs Hill along Pine Avenue and east of 8th Street. Paved parking is provided at Third Street, City Hall, and on the east side at 10th and 11th Streets. Public restrooms are located at the 3rd Street boat ramp and at McEuen Field on 5th Street. Portable toilets are seasonally located at the City Hall parking lot and the east side. Picnic tables, a gazebo, and children's play equipment are located at McEuen Field near the Third Street entrance to trails.

Other agencies involved with Tubbs Park include the Urban Forestry Commission and the USFS division for the Panhandle National Forest. Tubbs Hill has a problem with root rot in its Douglas fir trees, which can kill the trees, and with mistletoe in the Ponderosa pines, which grows on trees and takes nutrients away, eventually killing small trees.

4.0 ALTERNATIVES

In accordance with Federal laws and FEMA regulations, the EA process for a proposed federal action must include an evaluation of alternatives and a discussion of the potential environmental impacts. This section includes the two alternatives considered in this draft EA: (1) the No Action Alternative and (2), the Proposed Action Alternative, to which FEMA funding would contribute.

A third alternative of utilizing prescribed burns was considered but not carried forward. Burns are weather dependent and require a balance of having the right fuels and how far apart the burn areas are stripped. It is a preferred method for areas that are conducive to burning, as it is a more natural process and releases nutrients and recovers quickly. However, the area proposed for mitigation is wetter and plans to try and burn in this section of the park were discarded, as it looked like it wouldn't work. In addition, the proximity of the western section to private homes and the central downtown area makes burning in the area inadvisable. Furthermore, prescribed burns are not an eligible activity under the HMGP grants.

The Proposed Action is the only feasible alternative that would meet the purpose and need by effectively reducing or removing the risks of wildfire.

4.1 Alternative 1 – No Action Alternative

Inclusion of a No Action Alternative in the environmental analysis and documentation is required under NEPA. The alternative evaluates the effects of not providing eligible assistance for a specific action and provides a benchmark against which the other alternatives may be evaluated.

Under the No Action Alternative, FEMA would not provide funding to reduce wildfire fuel loads in the target areas of Tubbs Hill. Existing conditions would continue to deteriorate. People and nearby structures would continue to be at risk from future catastrophic fire events. Current and ongoing activities to protect the open spaces and park/urban interface would continue, but not to the degree needed if a wildfire occurs. This alternative would not meet the project's purpose and need, nor the City's goals and objectives identified in the *Tubbs Hill Management Plan*.

4.2 Alternative 2 – Fuel Load Reduction in Western Portion of Tubbs Hill (Proposed Action)

The Proposed Action would remove excessive vegetation through hand thinning, pruning, limbing, sawing, or brush cutting by private contractors on approximately 27.45 acres in selected sections of the west side of Tubbs Hill.

The City plans to reduce the ground fuels within 30' of major trails and the fire road to enhance their use as a fire break. The focus of clearing would be to remove young trees and all shrubbery, leaving healthy Ponderosa Pine trees. The City would not remove big trees unless they pose a hazard, such as having the potential to fall on the trails. They also leave trees if they are a bird nesting tree (i.e., one tree on the main trail has an osprey nest). A percentage of the

shrubbery outside of the 30' buffer would also be removed. Where the main trail follows the shoreline, 30' above the trail and all the water to the water would be cleared. The area proposed for mitigation includes six sections, labeled 0-5. The shaded sections in Figure 5 below show where the project would occur.

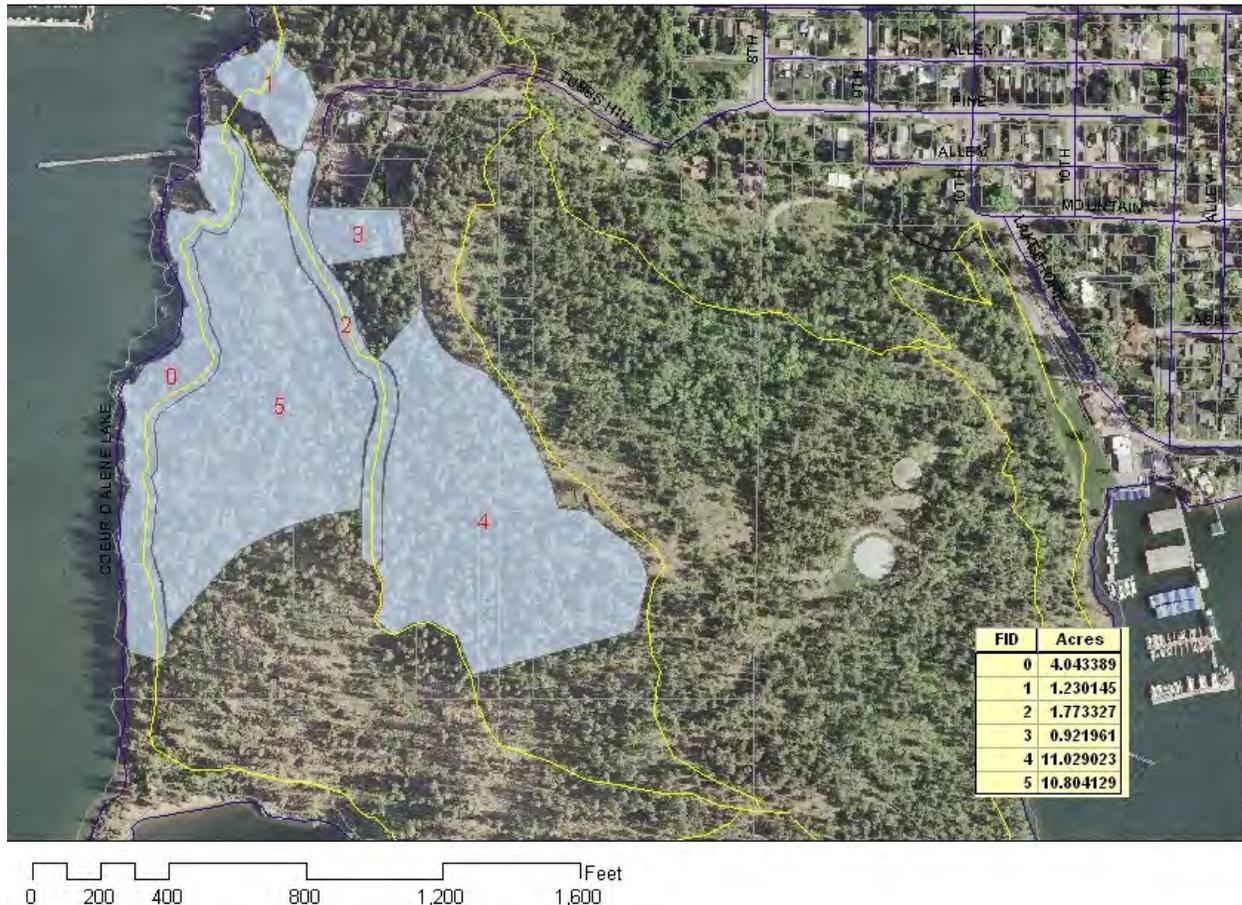


Figure 3. Aerial Site Location Map (including hazardous fuel reduction areas proposed)

The City would hire a contractor, who would bring a chipper up the main fire road and it would stay on the road. Staff would walk in and hand cut the trees and brush with chainsaws and handheld brush cutters. Small trees less than 5" in diameter at breast height (dbh) would be sectioned out by removing the limbs first. The stumps would be left within 4-6" of the ground. The buffer boundaries may be adjusted due to on- the-ground observations, but would not exceed 30'. For the larger trees that are left, their branches would be removed 8-10' in height so that fire can't climb into the trees. High shrubs over 5' in height would be cut at the base, leaving the roots, and would be scattered and left on the ground, with the snow eventually packing it down. The same would be done for shrubs less than 3' in height and spacing.

Some shrubs or vegetation would be flagged not to cut, with preference given to leave those with a dbh or 4-1/2' or more. Chips would be blown back onto the forest floor to retain the nutrients. The work would not involve ground disturbance and what is on the ground would be left there. By having the vegetation low to the ground it would suppress fire. Where the mitigation is proposed the

park tends to be drier and doesn't need non-native control of vegetation as much. Some Ponderosa pines may be replanted in Section 2.



Figure 4. Photo of 3rd Street docks from western portion of Tubbs Hill.



Figure 5. Photo of fire road access point adjacent to West Pine Avenue.

More work would be done to the main fire road than the side trails, as it would be used for fire department access. Outside of the 30' buffer in the planned reduction sections, the City plans to reduce the number and frequency of low shrubs by 75 percent to reduce available fuels yet retain enough undergrowth to retain recreational and natural interest. Their reduction doesn't have to be uniform or evenly spaced, as long as there are isolated areas. The methodology used for fuel reduction in the buffer zones would be applied to the remaining areas as well.

Fuel reduction mitigation has been completed during the past year in a southeastern section of the park. Figures 6 and 7 show how one section of the trail looked before and after fuel reduction at the site was conducted.

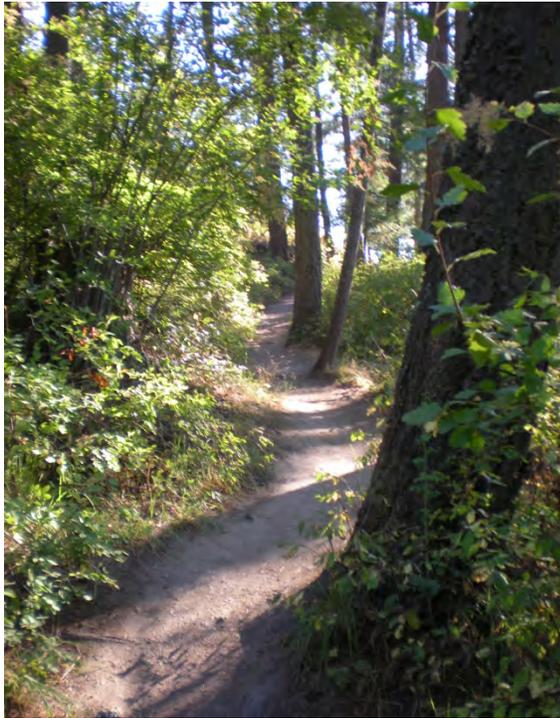


Figure 6. Photo Before: Eastern section of Tubbs Hill trail prior fuel load reduction in 2009.

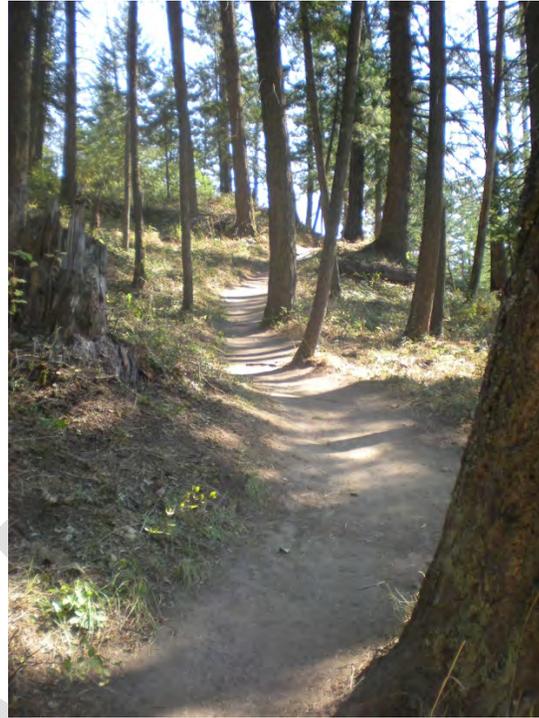


Figure 7. Photo After: View of same site after fuel load reduction was completed.

5.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

The NEPA compliance process requires federal agencies to consider direct and indirect impacts to the environment. The following subsections discuss the regulatory settings and the existing conditions for resources within the affected area. The discussion does not include a complete inventory of each resource, but does provide sufficient information to characterize those resources. This section also describes the potential effects of the two alternatives considered on resources.

For each resource category, the impact analysis follows the same general approach in terms of impact findings. When possible, quantitative information is provided to establish impacts. Qualitatively, these impacts will be measured as outlined below.

None/Negligible: The resource area would not be affected, or changes would be either non-detectable or if detected, would have effects that would be slight and local. Impacts would be well below regulatory standards, as applicable.

Minor: Changes to the resource would be measurable, although the changes would be small and localized. Impacts would be within or below regulatory standards, as applicable. Mitigation measures would reduce any potential adverse effects.

Moderate: Changes to the resource would be measurable and have both localized and regional scale impacts. Impacts would be within or below regulatory standards, but historical conditions are being altered on a short-term basis. Mitigation measures would be necessary and the measures would reduce any potential adverse effects.

Major: Changes would be readily measurable and would have substantial consequences on a local and regional level. Impacts would exceed regulatory standards. Mitigation measures to offset the adverse effects would be required to reduce impacts, though long-term changes to the resource would be expected.

Impacts are disclosed based on the amount of change or loss to the resource from the baseline conditions. Impacts may be direct or indirect. Direct impacts are caused by an action and occur at the same time and place as the action. Indirect impacts are caused by an action and occur later in time or are farther removed from the area, but are reasonably foreseeable. Cumulative impacts are discussed in Section 5.6.

Resources that were not analyzed in detail include air quality, visual resources, and hazardous materials. No prescribed fire would be used for fuel reduction in this project, so no effect to air quality is expected beyond small amounts of dust and exhaust from short-term removal operations. No visual impacts are anticipated due to the minor loss of vegetation and small amounts of ground disturbance. No potential hazardous materials were identified in or near the vicinity of the project. These resources will not be analyzed to any further extent in this document.

5.1 Physical Resources

5.1.1 Climate Change

Generally, the climate in the Coeur d'Alene region can be described as cool with significant snowfall in the winter, and warm dry summers. The average annual rainfall is 26 inches and the average annual snowfall is 66.7 inches. The frost-free season runs about 120 days from mid-May to mid-September. Average temperatures range in the 60s in the summer, with highs in the 70s and 80s; to the 30s in the winter, with lows in the 20s. The CEQ recently released guidance on how Federal agencies should consider climate change in their NEPA decisions documents, suggesting that quantitative analysis should be done if an action would release more than 25,000 metric tons of greenhouse gases per year (CEQ 2010).

5.1.2 Geology and Soils

The City sits on the western edge of the Coeur d'Alene National Forest and is surrounded by forest, which contains several lakes and campgrounds. The form of Tubbs Hill is attributed either to scour or scour by debris from materials carried by floodwater from prehistoric Lake Missoula. The remnant land for which is Tubbs Hill is composed of bedrock from the Prichard Formation from the Precambrian Age. Exposed outcrops most frequently occur on the shoreline where they range from ten to fifty feet in height. Outcrops are also found near the summit and on steeper slopes on the southwest side of the park.

Soils occurring on Tubbs Hill are predominantly composed of coarse-grained high grade metamorphic rock and are well drained. Although the soils are variable depending upon their location, their development is closely related to the bedrock materials. According to the USDA (2011), mapped soil units within the park include: Lenz-Spokane-Rock outcrop association, McGuire Marble association, Skalan-Rock outcrop complex, and Vassar-Rock-outcrop complex. Depth of the soils is generally not great than fifteen inches, due to the resistant bedrock layer, permeability, and slope. The upper layer of soils is generally composed of wind-deposited silt and an ash layer. Soils on Tubbs Hill are prone to erosion, especially in areas which have been stripped of ground cover. Sloped areas exceeding a 15 percent grade are of poor structural quality and are therefore fragile in nature (Tubbs Hill Master Plan Draft 1980).

The Farmland Protection Policy Act (FPPA, 7 U.S. Code 4201 et seq.) requires that Federal agencies minimize the extent to which their programs contribute to the unnecessary conversion of prime farmland, unique farmland, and land of statewide or local importance to non-agricultural uses. Farmlands subject to FPPA requirements may be forestland, pastureland, or cropland, but cannot be urban built-up land.

5.1.3 Environmental Consequences

Alternative 1 – No Action

Under this alternative, FEMA would not provide funding to reduce hazardous fuel loads in Tubbs Hill. No impacts to climate or geology would occur. No impacts to soil resources within the project area would be expected, except for impacts associated with a catastrophic fire. These impacts may include loss of vegetation caused by uncontrolled fire and subsequent soil erosion. The impact intensity would range from minor to major, depending on the size and severity of the wildfire.

Alternative 2 – Proposed Action

No effect geology would be expected based on the nature and small scale of the project and the minor ground disturbing activities. No environmental consequences to soils are expected from fuel reduction activities in the project area because the activities would not require leveling of the soil. Mechanical removal activities are not proposed due to the steep nature of the project area. All vehicles would use the existing infrastructure as a result of the steep terrain. Additionally, no fuel reduction by burning is planned for this project. While individual trees may be removed, their roots would be left in place. Vegetation removal in overly large areas at a given time would be avoided and best management practices (BMPs) for erosion control, such as wood mulching and leaving the smaller cut vegetation on-site, would be employed. The impact intensity would be minor. Because the park is located within the city limits of Coeur D'Alene and does not involve any change in land use, there would be no effect to prime or unique farmlands.

Direct, indirect, and cumulative effects to soil productivity, fertility, stability, or infiltration capacity would be at or below the level of detection. Any adverse effects on soil productivity or fertility would be slight, and no long-term effects to soils would occur.

No detailed analysis was completed for climate change effects, because the amount of greenhouse gases released through implementation of the Proposed Action would be negligible, not meeting the above threshold. Reducing the risk or severity of wildfires would generally be a positive effect to climate change because of the consequent reduction in greenhouse gas releases. However, given the very small and localized scale of the Proposed Action, these fuel reduction activities are not expected to affect overall climate change conditions.

5.2 Wetlands and Water Resources

5.2.1 Surface, Ground, and Water Quality (including Wetlands)

Executive Order (EO) 11990, Protection of Wetlands, requires Federal agencies, in planning their actions, to consider alternatives to wetland sites and limit potential damage if an activity affecting a wetland cannot be avoided. Section 303(d) of the Clean Water Act establishes requirements for States and Tribes to identify and prioritize water bodies that do not meet water quality standards. The project is not near or adjacent to streams or wetlands. There is seasonal drainage running through the park; however it does not carry water year-round. There is a water reservoir, water tank, and a water pump station on the east side, but these sites will not be impacted by the project. The USFWS' *National Wetland Inventory* has no wetlands delineated within the project area (2011). The park is surrounded on the east, west, and south sides by Coeur d'Alene Lake, which is listed as impaired by the Idaho Division of Environmental Quality (Hydraulic Unit Code 17010303).

5.2.2 Floodplains

EO 11988, Floodplain Management, requires Federal agencies to avoid, to the extent possible, the long- and short-term adverse impacts associated with the occupancy and modification of floodplains, and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative. The majority of the project actions would not occur in a floodplain, per FEMA Flood Insurance Rate Map Community Panel 1600760190D. The elevation of Tubbs Hill quickly rises from the shoreline and is in Zone X, an area determined to be outside of a 500-year flood. The immediate shoreline of Coeur d'Alene Lake is in Zone A and is considered in a floodplain.

5.2.3 Environmental Consequences

Alternative 1 – No Action

No impacts to water resources would be expected from the No Action Alternative. There are not any wetlands or water resources other than Coeur d'Alene Lake within or adjacent to the project area, and no manual or mechanical vegetation removal would occur that would have the potential to affect the lake. No action would not cause any change to existing floodplain values.

Alternative 2 – Proposed Action

The project area is not near or adjacent to any wetlands or streams. The proposed work would occur during the dry season, when seasonal runoff is not expected. No activities would take place below the ordinary high water mark (OHWM) of Coeur d'Alene Lake and the implementation of appropriate BMPs for sediment and erosion control required in Section 7 would ensure the lake will not be affected by the project. A site visit conducted by FEMA Environmental and Historic Preservation staff on September 30, 2010, confirmed that no water resources would be impacted by the project.

No environmental consequences related to floodplains are expected from hazardous fuel reduction activities because the majority of the activities would not occur within a designated floodplain. For those activities along the shoreline located in a floodplain, no impacts are anticipated that would cause any change to pre-existing floodplain values.

No direct, indirect, or cumulative impacts to water resources are anticipated by the Proposed Action.

5.3 Biological Resources

5.3.1 Vegetation

The historic vegetation on Tubbs Hill was very different than what is present today. Prior to 1900, ponderosa pine trees dominated the hill with a smaller component of Douglas-fir and larch trees. In the early 1900s, the hill was heavily logged and the Douglas-fir that began life in the shade of the ponderosa pine became a large component of the new forest as ponderosa pine was removed. The forest on Tubbs Hill now consists primarily of Douglas-fir and a smaller component of ponderosa pine. Ponderosa pine is found largely in the portions of the park with shallow soils and the driest sites. For the majority of the action area for fuel load reduction, Douglas-fir dominates approximately 80 percent of the sections, but ponderosa pine can also be found when direct sunlight is available to the ground. The understory for these sections is dominated by shade-tolerant shrubs and trees, including ninebark (*Physocarpus malvaceus*) and oceanspray (*Holodiscus discolor*), with lesser amounts of snowberry (*Symphoricarpus albus*), mountain maple (*Acer glabrum*), and mockorange (*Philadelphus lewisii*). The ground cover consists of perennial forbs, ferns, mosses, and lichens.

Tubbs Hill has had chronic losses from insects and diseases for the trees within the park. Although the cumulative losses over many years may be large, annual losses most years have been relatively minor. In November 1996, a severe snow and ice storm swept through northern Idaho, snapping off and knocking down many trees and creating ideal conditions for many species of bark beetles and wood borers to build up. Many of the trees were already vulnerable due to bark beetle infestation that had either killed or damaged trees. Salvage logging by helicopter was conducted in May of 1997, following the ice storm. The slash was then cleared.

Even though Tubbs Hill is somewhat isolated, it did not escape a continued insect epidemic. As a result, approximately 50 acres of the Douglas-fir stands on the north and east portions of Tubbs Hill were treated in May 1999 with a synthetic chemical “MCH” that prevented additional trees from attack by Douglas-fir beetles (*Dendroctonus pseudotsugae*). However, there was not enough of MCH to treat all the Douglas-fir stands on Tubbs Hill, and there was no way to save the trees that had already been attacked. In addition to the Douglas-fir beetle, the western pine beetle (*Dendroctonus brevicomis*) is an aggressive killer of ponderosa pine throughout Idaho and neighboring states. As a result, bark beetles have been actively killing trees for many years, including both Douglas-fir and ponderosa pine.

Pockets with root rot are another problem affecting Douglas-fir trees in the park. It is a fungal infection in soil that spreads from root to root. Many of the large Douglas-fir near root rot disease centers on Tubbs Hill are either dead or have symptoms of infection and are not expected to live much longer. John Schwandt, USFS pathologist, has been working in Idaho on the root rot problem. There is no estimate of the number of trees in the park with root rot, but it is typical to find a lot of it in one area, particularly on the north and east side of the park. Douglas-fir trees are infrequently killed directly as a result of root decay alone, but often suffer from wind breakage or are preferentially attacked by bark beetles.

In addition to bark beetles and root rot, there is also a problem with dwarf mistletoe in the ponderosa pines. It is a small, leafless, parasitic plant that grows on the trees and takes nutrients away. The growth clusters initially looks like a big gnarly softball with aerial shoots called witches’ brooms. Although it can kill small trees, it is host specific and cannot spread to other species such as Douglas-fir.

5.3.2 Wildlife and Fish

Numerous bird species are in and adjacent to Tubbs Hill, including osprey, bald eagles, various songbirds such as pygmy and red-breasted nuthatch and violet-green swallows, and waterbirds in and adjacent to Lake Coeur d’Alene. There is nesting habitat within the park and one tree on the fire road has an osprey nest. Osprey typically nest in the region from April through July, according to Rick Donaldson (2011), biologist for the U.S. Fish and Wildlife Service (USFWS). Additional wildlife includes mammals (bats, squirrels, porcupines, skunk, mice, deer, and wild turkeys) and some reptiles and amphibians (painted turtle, pine snake, Rocky Mountain rubber boa, spotted frog, western garter snake, western skink, and western toad).

Coeur d’Alene Lake, which surrounds the hill on three sides, provides a diverse fishery for both cold and warm water species. Fish that occur in Coeur d’Alene Lake include black crappie, northern pike, smallmouth bass, largemouth bass, yellow perch, Chinook salmon, and sockeye salmon. Smallmouth bass occur year-round and are most numerous along rocky shorelines of the lake. Largemouth bass occur year-round are most numerous in weedy bays.

5.3.3 Federally Listed Species and Critical Habitat

The Endangered Species Act (ESA) was established to conserve, protect, and restore Threatened and Endangered species and their habitats. Section 7 of the ESA (50 CFR 402) requires Federal

agencies to ensure their actions do not jeopardize the continued existence of listed species and do not result in adverse modification to designated critical habitat. Five listed species under the Endangered Species Act (ESA) are known to occur in Kootenai County: Canada lynx (*Lynx canadensis*), listed as threatened; gray wolf (*Canis lupus*), listed as endangered; bull trout (*Salvelinus confluentus*), listed as threatened and as having critical habitat; Spalding's catchfly (*Silene spaldingii*), listed as threatened; and water howellia (*Howellia aquatilis*), listed as threatened. Of these, bull trout are known to occur in Coeur d'Alene Lake in very small numbers. However, they occur in deeper areas of the lake and would not occur near the Tubbs Hill shoreline (Jim Fredericks, IDFG). Chinook salmon also occur, but are landlocked non-native stock and are not included under ESA listings.

The Canada lynx and gray wolf will not be discussed further since Tubbs Hill is surrounded by urban development and the project is outside the known range for these species. This was confirmed by Jim Fredericks (2011), IDFG biologist, and Rick Donaldson (2011), USFWS biologist. There would be no project effect would to these species.

5.3.4 Migratory Birds

The project area provides habitat for a variety of migratory birds, including songbirds and birds of prey. The Migratory Bird Treaty Act (MBTA) of 1918, as amended, provides federal protections for migratory birds, their nests, eggs, and body parts from harm, sale, or other injurious actions. The MBTA includes a "no take" provision.

In northern Idaho, the primary nesting season for migratory birds generally occurs between April 1 and August 1 each year, although nesting activity may vary by year, location, and species (Donaldson 2011).

5.3.5 Environmental Consequences

Alternative 1 – No Action

Under this alternative, FEMA would not provide funding to reduce hazardous fuel loads in Tubbs Hill and no vegetation management activities would be conducted. Wildlife currently inhabiting or foraging in the area would continue to do so. Tubbs Hill would continue to be at risk from wildfires, and the high risk of vegetation loss from wildfires would remain the same. Factors contributing to the highest fire risk include combinations of steep topography, fuel loads, and significant access issues; with the one-mile fire road being the only vehicular access route for brush fire vehicles within the park. This includes residences adjacent to the park lacking defensible space between the natural vegetation and structures.

No impacts to biological resources would be expected, except for impacts associated with a wildfire. These impacts may include loss of vegetation caused by uncontrolled fire and subsequent soil erosion, along with adverse impacts to wildlife through the loss of habitat or the mortality of individuals. The impact intensity would range from minor to major, depending on the size and severity of the wildfire.

Alternative 2 – Proposed Action

The impact intensity to vegetation from the Proposed Action would be minor. Integrating thinning and manual vegetative treatment could result in a small loss of individual native plants. Various disturbances from work crews, removal of individual small trees, and hand pruning or limbing would result in localized, indirect, small effects to native plant communities. However, in these habitat types thinning is generally desirable and promotes reduction of overstocked understory trees and shrubs. The majority of the vegetation removed would be brush.

The Proposed Action also includes removing small Ponderosa pine trees that are infected with dwarf mistletoe so it doesn't spread, along with dead or dying Douglas-fir trees in the action area. Removal of the hazard trees along the trail system will address public safety concerns for recreational users of the park. While dead trees are important for wildlife habitat, there are many dead trees that are not hazards to the trails that would serve this purpose.

Overall changes in the vegetative community or species population would be minor, with small and localized effects to a relatively minor proportion of any native species population. Many of these species are ecologically dependent on fire and fire cycles, and the effects are considered minor in the short term and beneficial in the long term.

No in-water work is proposed for the project and aquatic species such as small mouth bass that are oriented towards the shoreline would not be affected. The project is not anticipated to affect food fish populations in the lake or to contribute to pollution levels or contamination of lake waters.

Informal consultation for ESA-listed species was conducted with the USFWS and determined the only species likely to be found near the proximity of the Proposed Action is bull trout. Because the proposed work would not be conducted in the waters of Lake Coeur d'Alene and little, if any, ground disturbance is anticipated, the USFWS (2011) agreed there would be no effect to bull trout.

Impacts to non-listed wildlife, including migratory birds, could occur through habitat modification. Various factors including changes in food sources, shelter, population density, and dispersal effort would determine the severity of impacts to non-listed wildlife. These impacts would be minor, and the changes would be small and localized. All nesting trees would be flagged to be left alone during project implementation and would be a condition of project approval. These impacts would dissipate as displaced individuals either establish new home ranges or are outcompeted. These effects would not be expected to exceed the natural range of variability or have long-term effects on the natural processes sustaining these populations.

Consultation with the USFWS (2011) was conducted in view of determining conservation measures to minimize impacts to nesting migratory birds protected under the MBTA. The USFWS supports the plan to avoid cutting larger trees in the project area, especially mature ponderosa pine. To ensure migratory birds are protected, it was determined that no vegetation shall be cut or removed between April 1 and August 1 in any given year.

5.4 Cultural Resources

The National Historic Preservation Act (NHPA) requires Federally-funded actions to protect cultural resources in and around a project site, in cooperation with the state, tribes, and local governments. Section 106 of the NHPA and its implementing regulations (36 CFR 800) outline the procedures to be followed in the documentation, evaluation and mitigation of impacts to cultural resources. The State Historic Preservation Officer (SHPO) is responsible for administering state-level programs. Cultural resources include resources of historical and/or archaeological significance. For purposes of this analysis, the term “archaeological resources” is used to refer to prehistoric or historical subsurface sites or objects, and the term “historic resources” is used to refer to above-ground historic structures and sites.

The Area of Potential Effects (APE) targeted for wildfire vegetation management at Tubbs Hill includes six different zones in the western portion of the park that includes approximately 27.45 acres. The APE is accessible by the 3rd Street trail access entrance and by the fire road that starts at the end of Tubbs Hill Road (an extension of Pine Avenue). The fire road is sufficient for use by large 4-wheel drive brushfire vehicles and is gated to prevent access by unauthorized vehicles.

5.4.1 Prehistoric Context (American Indian/Religious Sites/Tribal Interests)

Historical research indicates the APE is within the vast Coeur d’Alene ancestral territory. Tubbs Hill and the City of Coeur d’Alene were once part of the vast four million acre territory claimed by the Coeur d’Alene Indians. The Coeur d’Alenes were a semi-nomadic tribe with an estimated population of 3-4,000. They referred to themselves as Skeetwish, meaning “discovered people” and acquired the name Coeur d’Alene from French Canadian trappers.

5.4.2 Historic Context

The City of Coeur d’Alene began as a military post in the late 1870s when Camp Coeur d’Alene, later renamed Fort Sherman, was established by General Sherman of Civil War fame. The purpose of the fort was to provide safety for settlers traveling west. A small community developed around it consisting of soldiers’ families and settlers who supplied the fort with wood and food. Fort Sherman was located northwest of Tubbs Hill along the shores of Lake Coeur d’Alene.

Coeur d’Alene prospered when A.J. Pritchard discovered gold in 1881, on what is now called Pritchard Creek. The additional discovery of silver and lead in the Coeur d’Alene mining district caused the town to be inundated with prospectors, utilizing steamers to transport miners and supplies up the Coeur d’Alene River to the Old Mission landing east of town via Lake Coeur d’Alene. Steamboat docks were located on Lake Coeur d’Alene near the present day floating boardwalk northwest of Tubbs Hill.

Tony A. Tubbs, an immigrant from Germany, came into the area in 1882 and filed a claim which included a large portion of what is now Tubbs Hill. In 1884, he made a plat of the west portion of the site, which became known as the Tubbs Addition to the City of Coeur d’Alene, consisting

of 11 lots. It began in the north at the toe of the hill and covered the west slope along the lake to the south shore. The south side of the addition to the water's edge was dedicated as "Beauty Bay Park" to the inhabitants of Coeur d'Alene to be kept there for the free use, occupation, and enjoyment by residents. It included a sandy beach and rock peninsula in the southwest corner of the park where there is a battery-powered navigation light that is maintained by the U.S. Coast Guard.

In the early days, Tubbs Hill was too difficult to develop by land. A wealthy pioneer, Austin Corbin II, succeeded in building a house above the cove at the southwest end of Tubbs Hill, when he acquired property in Tubbs Addition on August 14, 1906. The Corbin house was abandoned, probably vandalized, and by the 1930s had only a fireplace chimney standing (Scott W. Reed, 2008).

In the 1920s and 1930s, the IDFG operated a fish hatchery along the shore between the toe of the hill and Ray Jones Marina, now the 11th Street Marina. After the hatchery was closed, the state property changed hands two times before it was eventually sold to the City in 1975. In the interim, the building on the property used in connection with the hatchery was turned into a maintenance office for the Idaho Water Company, which the city rented out as a residence once they acquired ownership. This portion of Tubbs Hill includes a trail entrance on the east side from 11th Street that connects to the trails encircling the park and topping the hill. This site is located well outside of the APE to the east.

5.4.3 Historic Properties

A review of National Register of Historic Places listings in the APE's vicinity resulted in no listed historic properties within or near the APE.

Historic resources identified in the APE include two concrete post holes at the top of Tubbs Hill that were used to post the American flag during special events. At the very highest point of the hill are two concrete post holes located in the APE, with one at least 12 inches across and the other pole size. From *The Treasure Called Tubbs Hill* by Scott Reed, Roger Young, who was born in 1925 and wandered Tubbs Hill while growing up, is quoted as remembering a tree-sized pole fitting into a 12-inch diameter hole at this location. The American flag was run up the pole on special occasions and was visible all over town. It is theorized when the big tree broke or fell, a new smaller diameter hole was constructed for a more manageable flagpole. No one has used either post hole in recent generations and with the surrounding forest that now exists, a flag could not be seen. The post holes would not be altered during project implementation.

Today, only remnants of the concrete foundation of the Corbin House remain where the chimney once stood. Remnants of the Corbin House remains and the southwest peninsula are both located outside of the APE for the proposed undertaking.

Also of note, concrete footings and remnant flowerbeds consisting of five concrete blocks remain in the southeast portion of the park (well outside of the APE) where a once impressive grandstand was erected in 1914. It was the favorite spot of thousands for viewing Independence Day celebrations and rowing regattas. The grandstand was also used for viewing passing

steamboats and the burning of old boats during Fourth of July celebrations, and to view hydroplane races that occurred during the summer from 1958-1966.

5.4.4 Environmental Consequences

Alternative 1 – No Action

Under the No Action Alternative, FEMA would not provide funding to reduce fuel loads in Tubbs Hill thus no new activities would occur that would potentially affect cultural resources.

Alternative 2 – Proposed Action

FEMA initiated consultation with the SHPO, Coeur d'Alene Tribe, and Kalispel Tribe of Indians for additional information about historic properties that may be within the APE. In a January 7, 2011 letter, the SHPO stated that their records indicate two Native American archaeological sites (10KA46 and 10KA479) are located within or near the project area. Another site (10KA47) is located on the eastern side of the hill. With the presence of these sites, the SHPO advised that they would wait to provide final recommendations until the views of the presumed significance was obtained by the tribes consulted, thus a response is pending.

The Kalispel Tribe responded on January 11, 2011, that they would not be commenting on the project as it is located outside of ceded lands. The Coeur d'Alene Tribe conducted a site visit on April 27, 2011 and determined that based on the nature and location of activities there would be no impact to historic properties that may be of religious or cultural significance to them (Wagner 2011).

FEMA has determined that the fuel reduction project would have no effect on historic properties because the areas delineated for fuel reduction occurs outside of the areas where historic resources have been identified, with the exception of concrete post holes at the top of Tubbs Hill, which would not be impacted. The potential for archaeological resource impacts is limited as ground disturbance will be minimally invasive given fuels reduction methodologies, and thus no further field investigations were conducted to further evaluate the potential presence of archeological resources.

An unexpected discovery clause is included in Section 8.0 and requires that in the event historically or archaeologically significant materials or sites (or evidence thereof) are discovered during the implementation of the project, work in the affected area shall be halted and all reasonable measures taken to avoid or minimize harm to the find until such time as FEMA, in consultation with the SHPO and Tribes, evaluates the find in compliance with the NHPA.

5.5 Socioeconomic Resources

Executive Order (EO) 12898, Environmental Justice, directs federal agencies to identify and address, as appropriate, disproportionately high and adverse human health or environment effects on minority and low-income populations in the United States resulting from federal programs, policies, and activities. Socioeconomic and demographic data for residents in the project vicinity

was reviewed to determine if a disproportionate number (defined as greater than 50 percent) of minority or low-income persons have the potential to be affected by the Proposed Action.

5.5.1 Environmental Justice

For the purpose of evaluating Environmental Justice effects in this draft EA, the affected environment is defined as the population of the City of Coeur d'Alene, Idaho. Statistics for Kootenai County were also evaluated for comparison. As reported in the 2000 U.S. Census, there were 34,514 people in the city, with 95.8 percent white, .22 percent black, .77 percent American Indian, .61 percent Asian, and the remaining population from other races. The county population was reported as 108,685 in 2000. The U.S. Census determined that 12.8 percent of the city population was below the poverty line in 2000, compared to 10.5 percent for the county. There was very little change to the population demographics for the 2005 to 2009 U.S. Census estimates; however the population estimate for the city increased to 41,898, and the county increased to 133,461.

5.5.2 Public Health and Safety

The number of dead trees and ladder fuels from dead branches low on live trees and tall shrub cover has produced a fairly heavy fuel load in Tubbs Hill, particularly in the western portion of the park that has not had fuel reduction activities in recent history. The ladder fuels that exist provide a means for ground fires to get into crowns of trees and spread from crown to crown. Crown fires spread quickly and are harder to control than ground fires. A fuel model assessment by the Idaho Department of Lands calculated that with existing fuels, worse-case weather conditions, and a twenty minute response time by hand crews, a potential fire would be 9.3 acres in size on arrival with flame lengths of 8.5 feet. Use of hand crews for firefighting, which is what would be used inside the park, is limited to flame lengths of four feet or less.

The general public health and safety for the surrounding local populations of Tubbs Hill relates to the ability of the city to decrease the potential for a catastrophic fire that would impact the community as a whole. Of particular concern are the houses and other private structures that are on or immediately adjacent to Tubbs Hill. There is a general lack of sufficient buffer zones between many of the structures and Tubbs Hill vegetation. A fire on Tubbs Hill could threaten the structures as, conversely, a structure fire could threaten Tubbs Hill.

People are perceived to present the greatest threat of igniting fires. Areas of heavy use, such as trails are the areas of great concern. Other areas of concern are those where people are likely to light campfires, including beach areas and sites in secluded locations likely to be used for "camps".

5.5.3 Environmental Consequences

Alternative 1 – No Action

Under the No Action Alternative, FEMA would not provide funding to reduce fuel loads in Tubbs Hill. The community would remain at risk from future wildfire events. This alternative

would have a potential major adverse effect with substantial consequences to public health and safety, should a catastrophic fire occur. Effects could include injury and loss of life and damage or loss of improved property.

Alternative 2 – Proposed Action

The areas selected under the Proposed Action are areas determined high-priority based solely on their need for fuel reduction to protect residents and businesses located in downtown Coeur d’Alene adjacent to Tubbs Hill from damages that could occur during future wildfire events in the forested park. Demographics were not a factor in formulating the project and all demographic groups surrounding the park would equally benefit from reduced wildfire risks and improved public safety.

5.6 Cumulative Effects

CEQ regulations (40 CFR 1508) for implementing NEPA require an assessment of cumulative effects during the decision-making. Cumulative effects are those that result from the incremental effect of an action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (federal or non-federal) or person undertakes an action. Cumulative effects can result from individually minor, but collectively significant, actions taking place over a period of time.

The Proposed Action is not expected to have adverse cumulative impacts to climate, geology, and soils; water resources; cultural resources; or socioeconomic resources; as no adverse project impacts are anticipated. Adverse impacts to biological resources, including wildlife and migratory birds, could occur through short-term habitat modification when combined with other activities in the region that impact habitat suitability; however these impacts would not result in significant overall permanent adverse effects. Also, mimicking the maintenance function natural wildfires provide to forest health through vegetation management activities could be a beneficial effect to forest resources in the region. Although the Proposed Action, when combined with other planned wildfire mitigation activities in the region, would reduce the risk of large wildfire-cause greenhouse gas emissions, the cumulative beneficial effects would be negligible from an overall climate change standpoint.

6.0 AGENCY COORDINATION AND PUBLIC INVOLVEMENT

Several state and federal agencies, in addition to two tribes, were consulted throughout the draft EA process to gather valuable input and to meet regulatory requirements. Agencies contacted included the IDFG, USFWS, SHPO, and Idaho DEQ.

FEMA’s draft EA is being released and a public notice is being posted in Coeur d’Alene for a 30-day public review and comment period. The draft EA and public notice will be posted for viewing on FEMA’s website at <http://www.fema.gov/plan/ehp/envdocuments/index.shtm>. A copy of the public notice is included in Appendix B.

The initial public notice will also serve as the final public notice for this project. Unless significant substantive public comments are received, no further public involvement will be conducted for this draft EA. FEMA does not anticipate the need to prepare an Environmental Impact Statement. In the public notice distributed with the draft EA, all recipients were notified that after the public comment period ends, provided no substantive comments are received, the final EA and a FONSI will be available at the above website.

7.0 PERMITTING, PROJECT CONDITIONS, AND MITIGATION MEASURES

The City of Coeur d'Alene is required to obtain and comply with all local, state, and federal permits and approvals prior to implementing the Proposed Action Alternative. Activities within the Proposed Action Alternative project areas shall be consistent with the scope of work in the project grant application.

The following mitigation measures are required as conditions of FEMA funding:

1. The applicant is responsible for selecting, implementing, monitoring, and maintaining appropriate BMPs to provide habitat protection.
2. To ensure migratory birds are protected, no vegetation shall be cut or removed between April 1 and August 1.
3. All nesting trees within the action area shall be flagged prior to project implementation and shall be left alone during fuel reduction activities.
4. In the event that historically or archaeologically significant materials or sites (or evidence thereof) are discovered during the implementation of the project, the project shall be halted and all reasonable measures taken to avoid or minimize harm to property until such time as FEMA, in consultation with the SHPO, determines appropriate measures have been taken to ensure that the project is in compliance with the NHPA.
5. Any change to the approved scope of work will require re-evaluation for compliance with NEPA and other laws and Executive Orders.

8.0 CONCLUSION

The draft EA evaluated environmental and historic resources that could be affected by the Proposed Action. The evaluation did not identify any significant adverse impacts associated with the resources of geology, soils, and climate; water resources, wetlands, and floodplains; wildlife, fish, and vegetation (including ESA-listed species and critical habitat); historic, archaeological, and cultural resources; and socioeconomic and environmental justice. Implementing the Proposed Action, along with any conditions associated with permits or approvals, is expected to avoid or minimize adverse effects associated with the action. Following public involvement, FEMA will determine whether to issue a FONSI for the Proposed Action.

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DRAFT

APPENDIX A

Cultural Resources Concurrence Letters

DRAFT



"The History and Preservation People"

Our mission: to educate through the identification, preservation, and interpretation of Idaho's cultural heritage. www.idahohistory.net

C.L. "Butch" Otter Governor of Idaho

Janet L. Gallimore Executive Director

Administration 2205 Old Penitentiary Road Boise, Idaho 83712-8250 Office: (208) 334-2682 Fax: (208) 334-2774

Archaeological Survey of Idaho 210 Main Street Boise, Idaho 83702-7264 Office: (208) 334-3847 Fax: (208) 334-2775

Historical Museums and Education Programs 610 North Julia Davis Drive Boise, Idaho 83702-7695 Office: (208) 334-2120 Fax: (208) 334-4059

Historic Preservation Office 210 Main Street Boise, Idaho 83702-7264 Office: (208) 334-3861 Fax: (208) 334-2775

Historic Sites Office 2445 Old Penitentiary Road Boise, Idaho 83712-8254 Office: (208) 334-2844 Fax: (208) 334-3225

Public Archives and Research Library 2205 Old Penitentiary Road Boise, Idaho 83712-8250

Public Archives Office: (208) 334-2620 Fax: (208) 334-2626

Research Library Office: (208) 334-3356 Fax: (208) 334-3198

Oral History Office: (208) 334-3865 Fax: (208) 334-3198

MCS

January 7, 2011

Mr. Mark Eberlein
FEMA
Region X
130 228th St. SW
Bothell, WA 98021-9796

RE: FEMA Hazard Mitigation Program, Tubbs Hill Hazardous Fuel Reduction Program, City of Coeur d'Alene, Idaho

Dear Mark:

Thank you for requesting our views on the proposed fuels reduction project on Tubbs Hill in Coeur d'Alene, Idaho (T50N, R4W, Section 24). Work will include removing excessive vegetation along the fire access road, trails, and beaches in the northwest quadrant of the Hill. After reading the project description, we agree that most of the proposed actions have little potential to affect historic properties. We are concerned, however, about terms such as "landscape modifications" and "erosion control."

Considering the prominence of this landform and its location at the outlet of the lake, we would assume that it has historical and cultural significance to the Coeur d'Alene Tribe. We are pleased that you will be consulting with the Tribe. The appropriate contact would be Jill Wagner, Coeur d'Alene Tribal Historic Preservation Officer (208-686-1572).

Additionally, our records show that two Native American archaeological sites (10KA46 and 10KA479) are located within or near the project area. Another site (10KA47) is located on the eastern side of the Hill.

With the presence of these sites, and the presumed significance of the location to the Coeur d'Alene Tribe, we will probably recommend an archaeological survey. However, we will wait to provide final recommendations until after you have obtained the views of the Tribe.

We appreciate your cooperation. If you have any questions, please feel free to contact me at 208-334-3847, ext. 107.

Sincerely,
Susan Pengilly
Susan Pengilly
Deputy SHPO and
Compliance Coordinator

RECEIVED

JAN 12 2011

cc: Jill Wagner, Coeur d'Alene Tribe



FEMA REGION X

The Idaho State Historical Society is an Equal Opportunity Employer.



11 January 2011

Ms. Science Kilner
FEMA
U.S. Department of Homeland Security
Region X
130 228th Street, SW
Bothell, WA 98021-9796

Re: FEMA Hazard Mitigation Grant Program 1781 DR, Tubbs Hill Hazardous Fuel Reduction Program,
City of Coeur d'Alene, Idaho.

Dear Ms. Kilner:

Please thank Mr. Eberlein for his letter pertaining to the above referenced matter dated 4 January 2011. After review of the proposed undertaking I regret to share with you that the Kalispel Tribe of Indians shall not be commenting on this project as it is located outside its ceded lands. If you have not ready done so we recommend that you bring the matter to the attention of Dr. Jill Wagner of the Coeur d'Alene Tribe. In closing thank you for affording the Kalispel Tribe this opportunity to participate in this project.

Respectfully,

A handwritten signature in black ink, appearing to read "Kevin J. Lyons".

Kevin J. Lyons, M.A.
Cultural Resources Program Manager
Kalispel Natural Resources Department
Kalispel Tribe of Indians

KJL:kjl

Kalispel Tribe of Indians
P.O. Box 39
Usk, WA 99180
(509) 445-1147
(509) 445-1705 fax
www.kalispeltribe.com

RECEIVED

JAN 13 2011

FEMA REGION X

-----Original Message-----

From: Jill Wagner [mailto:jwagner@cdatribe-nsn.gov]
Sent: Friday, April 29, 2011 11:30 AM
To: Jackson David
Cc: Stephensen Mark; Kilner, Science; suzi.pengilly@ishs.idaho.gov; Baker Jay; KARENH@cdaid.org
Subject: RE: Tubbs Hill Wildfire Mitigation Project Cultural Assessment

Mr Jackson,

I had talked with someone, possibly Science Kilner, about this a while back and agreed to do a reconnaissance visit to the area as soon as I could when there wasn't snow. That turned out to be Wednesday April 27th.

I walked the trail system and a few off-trail areas through the fire suppression areas provided by Science in attachments to an email on Feb. 11. I'm drafting a letter stating that given the slope, the expected low impacts, and relation to existing sites, I believe that there will be no impact to known properties, and a request for immediate contact with this office in case of inadvertent discovery during project implementation.

Should that letter go to you or someone else?

Jill

Jill Maria Wagner, Ph.D.
Tribal Historic Preservation Officer
Cultural Resources Program
Coeur d'Alene Tribe
P.O. Box 408 / 850 A Street
Plummer, ID 83851
(208) 686-1572
jwagner@cdatribe-nsn.gov

APPENDIX B

Public Notice

DRAFT

**The U.S. Department of Homeland Security's
Federal Emergency Management Agency (FEMA)
Draft Environmental Assessment
FEMA-1781-DR-ID
City of Coeur d'Alene, Idaho**

Tubbs Hill Hazardous Fuel Reduction Project

Notice is hereby given that FEMA plans to assist the City of Coeur d'Alene by providing partial funding for a wildfire fuel load reduction project for Tubbs Hill City Park. FEMA is proposing to fund 75 percent of the cost for this project through its Hazard Mitigation Grant Program (HMGP), with the remainder coming from the applicant or other nonfederal sources. Federal financial assistance would be provided pursuant to the authority of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, Public Law 93-288, as amended.

FEMA has prepared a draft Environmental Assessment (EA) for the proposed project pursuant to the National Environmental Policy Act (NEPA) of 1969 and FEMA's implementing regulations. The draft EA will be finalized after agency and public review and input. The EA evaluates alternatives for compliance with applicable environmental laws, including: Executive Orders No. 11988 (Floodplain Management), No. 11990 (Protection of Wetlands), and No. 12898 (Environmental Justice). Alternative 1 is the No Action Alternative, and Alternative 2, the Proposed Action, would remove excessive vegetation on approximately 27.45 acres in selected sections of the west side of Tubbs Hill.

This notice will constitute as the final notice as required by Executive Order 11988, Floodplain Management, and Executive Order 11990, Protection of Wetlands. If no significant issues are identified during the comment period, FEMA will finalize the EA, issue a Finding of No Significant Impact (FONSI), and fund the project.

The draft EA is available for viewing at www.fema.gov/plan/ehp/envdocuments/index.shtm. Please submit your written comments to Mark Eberlein, FEMA Regional Environmental Officer, no later than midnight on _____. Comments can be submitted by:

1. By mail to: U.S. Department of Homeland Security
FEMA Region X
130 228th Street SW
Bothell, WA 98021-9796
2. Fax at: (425) 487-4613
3. E-mail at: mark.eberlein@dhs.gov

After the public comment period ends, the final EA and the FONSI will be available for viewing at: http://www.fema.gov/plan/ehp/envdocuments/archives_index.shtm.