

APPENDIX A  
FHWA Coordination

# JUNIPER DUNES ACCESS ROAD PROJECT

## TRIBAL CONSULTATION SUMMARY

### Confederated Tribes and Bands of the Yakama Nation (Yakama Nation)

- On June 20, 2014, the FHWA sent a letter to Yakama Nation Chairperson JoDe L. Goudy that described the proposed Juniper Dunes Access Road project and requested government-to-government consultation. The FHWA has not received a response to this letter. A copy of the June 20, 2014 letter can be found in Appendix A.
- On November 14, 2014, the FHWA sent a letter to Johnson Meninick, Yakama Nation Cultural Resources Program Manager, that defined the proposed Juniper Dunes Access Road project area of potential effects (APE), described the results of Eastern Washington University's (EWU) cultural resources survey, requested information on properties within the APE that may be eligible for the National Register of Historic Places (NRHP) that are of cultural or religious significance to the Yakama Nation and explained that the FHWA intends on making a No Historic Properties Section 106 of the National Historic Preservation Act (Section 106) effect determination for the Alternative 2 APE if the Yakama Nation does not have information on cultural or religious properties within that APE. The FHWA sent a copy of the October 2014 EWU cultural resources report along with the letter. On December 18, 2014, the FHWA sent an email to Johnson Meninick asking if the Yakama Nation has any concerns with the project. On January 8, 2015, Corrine Camuso, Yakama Nation Archaeologist, sent an email to the FHWA stating that the Yakama Nation has no comments regarding the project and does not request any further work be conducted. Copies of the November 14, 2014 letter, December 18, 2014 email and January 8, 2015 email can be found in Appendix A.

### Confederated Tribes of the Colville Reservation (Colville Tribe)

- On June 20, 2014, the FHWA sent a letter to Colville Tribe Chairperson Michael Finley that described the proposed Juniper Dunes Access Road project and requested government-to-government consultation. On July 9, 2014, Jon Meyer, on behalf of the Colville Tribe Tribal Historic Preservation Officer, sent a reply letter to the FHWA stating the proposed Juniper Dunes Access Road project lies within the traditional territory of the Palus Tribe, a constituent member of the Colville Tribe, and the Colville Tribe as a whole. The letter also states the Colville Tribe looks forward to consulting with

the FHWA on defining the APE and identifying cultural resources. Copies of the June 20, 2014 and July 9, 2014 letters can be found in Appendix A.

- On November 14, 2014, the FHWA sent a letter to Arrow Coyote, Colville Tribe History/Archaeology Program staff member, that defined the proposed Juniper Dunes Access Road project APE, described the results of EWU's cultural resources survey, requested information on properties within the APE that may be eligible for the NRHP that are of cultural or religious significance to the Colville Tribe and explained that the FHWA intends on making a No Historic Properties Section 106 effect determination for the Alternative 2 APE if the Colville Tribe does not have information on cultural or religious properties within that APE. The FHWA sent a copy of the October 2014 EWU cultural resources report along with the letter. On December 9, 2014, Arrow Coyote sent a reply letter to the FHWA stating that the EWU cultural resources report failed to mention the Palus Tribe and their ties to the project area and that the FHWA represent all interested parties in the future. The letter also states that the Colville Tribe agrees that the project will result in No Historic Properties Affected and that conditions for inadvertent discoveries, post-review discoveries and activities outside of the project area be observed. In response to Ms. Coyote's letter, the FHWA has asked the EWU to revise their report to include information about the Palus Tribe's ties to the project area. Copies of the November 14, 2014 and December 9, 2014 letters can be found in Appendix A.

### Confederated Tribes of the Umatilla Indian Reservation (Umatilla Tribe)

- On June 20, 2014, the FHWA sent a letter to Umatilla Tribe Chairperson Les Minthorn that described the proposed Juniper Dunes Access Road project and requested government-to-government consultation. The FHWA has not received a response to this letter. A copy of the June 20, 2014 letter can be found in Appendix A.
- On November 14, 2014, the FHWA sent a letter to Teara Farrow Ferman, Umatilla Tribe Cultural Resources Program Manager, that defined the proposed Juniper Dunes Access Road project APE, described the results of EWU's cultural resources survey, requested information on properties within the APE that may be eligible for the NRHP that are of cultural or religious significance to the Umatilla Tribe and explained that the FHWA intends on making a No Historic Properties Section 106 effect determination for the Alternative 2 APE if the Umatilla Tribe does not have information on cultural or religious properties within that APE. The FHWA sent a copy of the October 2014 EWU cultural resources report along with the letter. The FHWA did not receive a reply to this letter. On December 18, 2014, the FHWA sent an email to Teara Farrow Ferman asking if the Umatilla Tribe has any concerns with the project. On December 19, 2014, Amy Senn, Umatilla Tribe Archaeologist sent an email to the FHWA stating that the Umatilla Tribe defers to other interested tribes with regards to the project. Copies of the November 14,

2014 letter, December 18, 2014 email and December 19, 2014 email can be found in Appendix A.



U.S. Department  
of Transportation

**Federal Highway  
Administration**

Western Federal Lands Highway Division  
610 E. Fifth Street  
Vancouver, WA 98661  
Phone 360-619-7700  
Fax 360-619-7846

June 20, 2014

The Honorable Michael Finley, Chairperson  
Confederated Tribes of the Colville Reservation  
PO Box 150  
Nespelem, WA 98155

Re: Juniper Dunes Public Access Road, WA Franklin 2013(1)

Dear Chairperson Finley,

The Federal Highway Administration, Western Federal Lands Highway Division (WFL), in partnership with the Bureau of Land Management (BLM), is seeking comments and/or participation from the Confederated Tribes of the Colville Reservation regarding the Juniper Dunes Public Access Road project (Franklin County, WA) and Environmental Assessment. The project is in the early planning phases of the National Environmental Policy Act process. The purpose of the project is to provide a legal public access road to the Juniper Dunes Wilderness Area and Juniper Forest, starting at a public road and ending at a staging area adjacent to the Juniper Forest off-highway vehicle area. The project area has not been formally defined, but the location of the proposed end point is Latitude 46 20 45 N, Longitude 118 55 51 W. The project will take place on BLM and private land.

This letter is requesting government-to-government consultation with the Confederated Tribes of the Colville Reservation. We would gladly meet with you to discuss the project at your Agency Offices. Additionally, WFL and Franklin County are holding a public open house on July 31, 2014, at the TRAC Center at 6600 Burden Blvd, in Pasco, WA if you wish to attend. You may also contact us in writing or by email—contact information is at the end of this letter. The WFL Archaeologist will be sending another letter under separate cover to your Tribal Historic Preservation Officer to initiate consultation under Section 106 of the National Historic Preservation Act of 1966.

Attached is the Purpose and Need of the project and a map showing the general project area. At this time, we have not yet defined all of the areas of potential effect within the project area; we plan to formally develop project alternatives after receiving responses to our scoping efforts.

Please review the enclosed material and contact WFL before August 4, 2014. If you have any questions, please contact me at 360-619-7710, or Heather Wills, Environmental Manager, at 360-619-7967 or [heather.wills@dot.gov](mailto:heather.wills@dot.gov).

Respectfully,



Clara Conner  
Director, Western Federal Lands Highway Division

Enclosures:  
Juniper Dunes Purpose and Need  
Project Area Map

Cc:  
John Stensgar, Confederated Tribes of the Colville Reservation-Natural Resource Committee  
Chair  
Guy Moura, Confederated Tribes of the Colville Reservation -Tribal Historic Preservation  
Officer  
Keith Wong, WFL Project Manager  
Heather Wills, WFL Environmental Manager

## Juniper Dunes Public Access Road Draft Purpose and Need

### Purpose:

Provide a legal public access road to the Juniper Dunes Wilderness Area and Juniper Forest, starting at a public road and ending at a staging area adjacent to the Juniper Forest off-highway vehicle (OHV) area.

### Needs:

- Users currently access the Wilderness and OHV area by a private road (Peterson Road) that does not have an access easement.
- The owners of the road have closed Peterson Road in the past, cutting off access to the Wilderness and OHV area to the public.
- Peterson Road is not constructed or maintained by the County, so it does not meet County standards for safety and maintenance, and has the following deficiencies:
  - Intersection with Pasco-Kahlotus Road (major rural collector) is at an acute angle which can cause an increase in crash frequency.
  - Inadequate safety clear zone on the roadway, which can cause an increase in property damage and injury accidents.
  - Substandard roadway drainage, which causes poor surface conditions.
  - Poor road surface conditions, such as washboards and potholes, which can cause an increased crash frequency and increase in vehicle damage.
  - Inadequate and inconsistent width, which can cause passing conflicts and increased crash frequency.
- There has been damage to private property along Peterson Road from users of the road.
- The most accessible parking area for the OHV area is outside of the OHV area and is near to private property. The location of the parking area outside of the OHV area leads to use of OHV in unauthorized areas. The proximity of the parking area to private land has caused impacts to private property.
- The lack of legal access and poor road conditions make it difficult for law enforcement and emergency medical services to access the area. Currently, law enforcement patrols are very infrequent and emergency medical services are provided by helicopter.



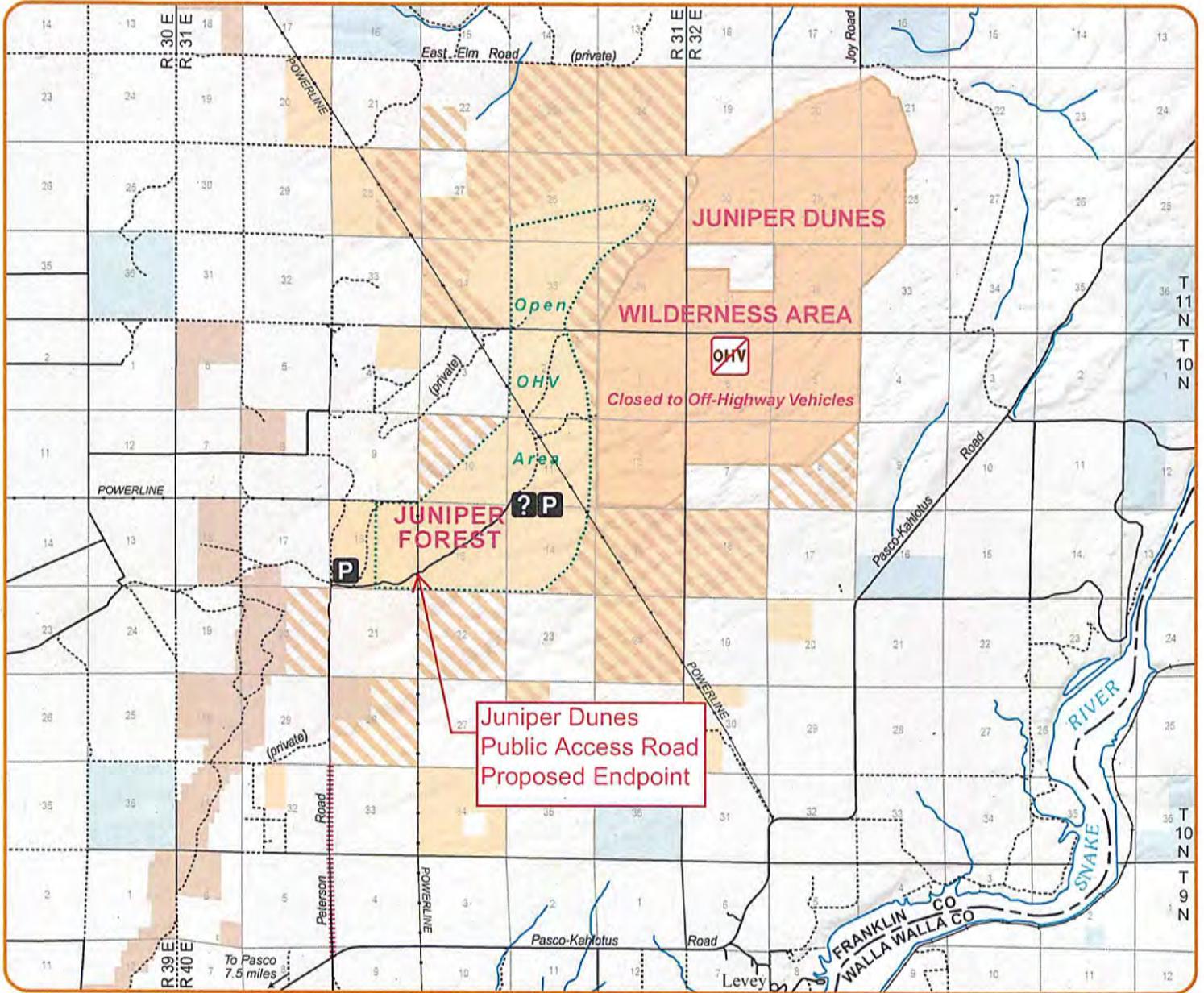
# Juniper Forest

## Recreation Opportunities



# Juniper Dunes Wilderness Area

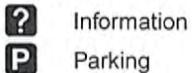
## Recreation Opportunities



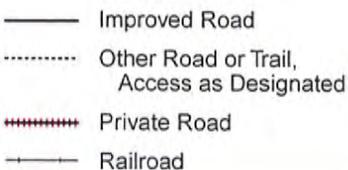
Juniper Dunes  
Public Access Road  
Proposed Endpoint

### LEGEND

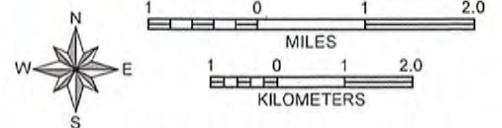
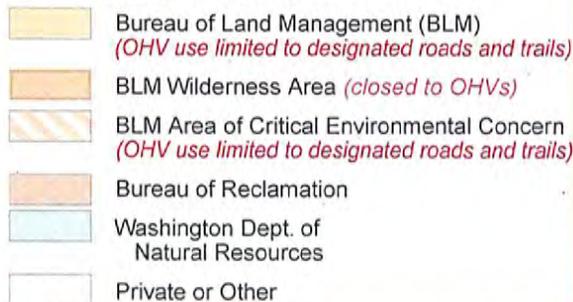
#### Recreation



#### Transportation



#### Administered Land



U. S. Department of the Interior  
Bureau of Land Management  
Spokane District  
1103 N. Fancher  
Spokane, WA 99212  
(509) 536-1200

It is unlawful to trespass on private lands. State hunting and fishing regulations apply to private lands. Landowners are not required to post or fence their lands. Check with private landowners before entering their property.



U.S. Department  
of Transportation

**Federal Highway  
Administration**

Western Federal Lands Highway Division  
610 E. Fifth Street  
Vancouver, WA 98661  
Phone 360-619-7700  
Fax 360-619-7846

June 20, 2014

The Honorable Les Minthorn, Chairperson  
Confederated Tribes of the Umatilla Indian Reservation  
46411 Timine Way  
Pendleton, OR 97801

Re: Juniper Dunes Public Access Road, WA Franklin 2013(1)

Dear Chairperson Minthorn,

The Federal Highway Administration, Western Federal Lands Highway Division (WFL), in partnership with the Bureau of Land Management (BLM), is seeking comments and/or participation from the Confederated Tribes of the Umatilla Indian Reservation regarding the Juniper Dunes Public Access Road project (Franklin County, WA) and Environmental Assessment. The project is in the early planning phases of the National Environmental Policy Act process. The purpose of the project is to provide a legal public access road to the Juniper Dunes Wilderness Area and Juniper Forest, starting at a public road and ending at a staging area adjacent to the Juniper Forest off-highway vehicle area. The project area has not been formally defined, but the location of the proposed end point is Latitude 46 20 45 N, Longitude 118 55 51 W. The project will take place on BLM and private land.

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Attached is the Purpose and Need of the project and a map showing the general project area. At this time, we have not yet defined all of the areas of potential effect within the project area; we plan to formally develop project alternatives after receiving responses to our scoping efforts.

Please review the enclosed material and contact WFL before August 4, 2014. If you have any questions, please contact me at 360-619-7710, or Heather Wills, Environmental Manager, at 360-619-7967 or [heather.wills@dot.gov](mailto:heather.wills@dot.gov).

Respectfully,



Clara Conner  
Director, Western Federal Lands Highway Division

Enclosures:

Juniper Dunes Purpose and Need  
Project Area Map

Cc:

Eric Quaempts, Confederated Tribes of the Umatilla Indian Reservation-Natural Resources  
Director  
Carey Miller, Confederated Tribes of the Umatilla Indian Reservation -Tribal Historic  
Preservation Officer  
Keith Wong, WFL Project Manager  
Heather Wills, WFL Environmental Manager

## Juniper Dunes Public Access Road Draft Purpose and Need

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- The owners of the road have closed Peterson Road in the past, cutting off access to the Wilderness and OHV area to the public.
- Peterson Road is not constructed or maintained by the County, so it does not meet County standards for safety and maintenance, and has the following deficiencies:
  - Intersection with Pasco-Kahlotus Road (major rural collector) is at an acute angle which can cause an increase in crash frequency.
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- The lack of legal access and poor road conditions make it difficult for law enforcement and emergency medical services to access the area. Currently, law enforcement patrols are very infrequent and emergency medical services are provided by helicopter.



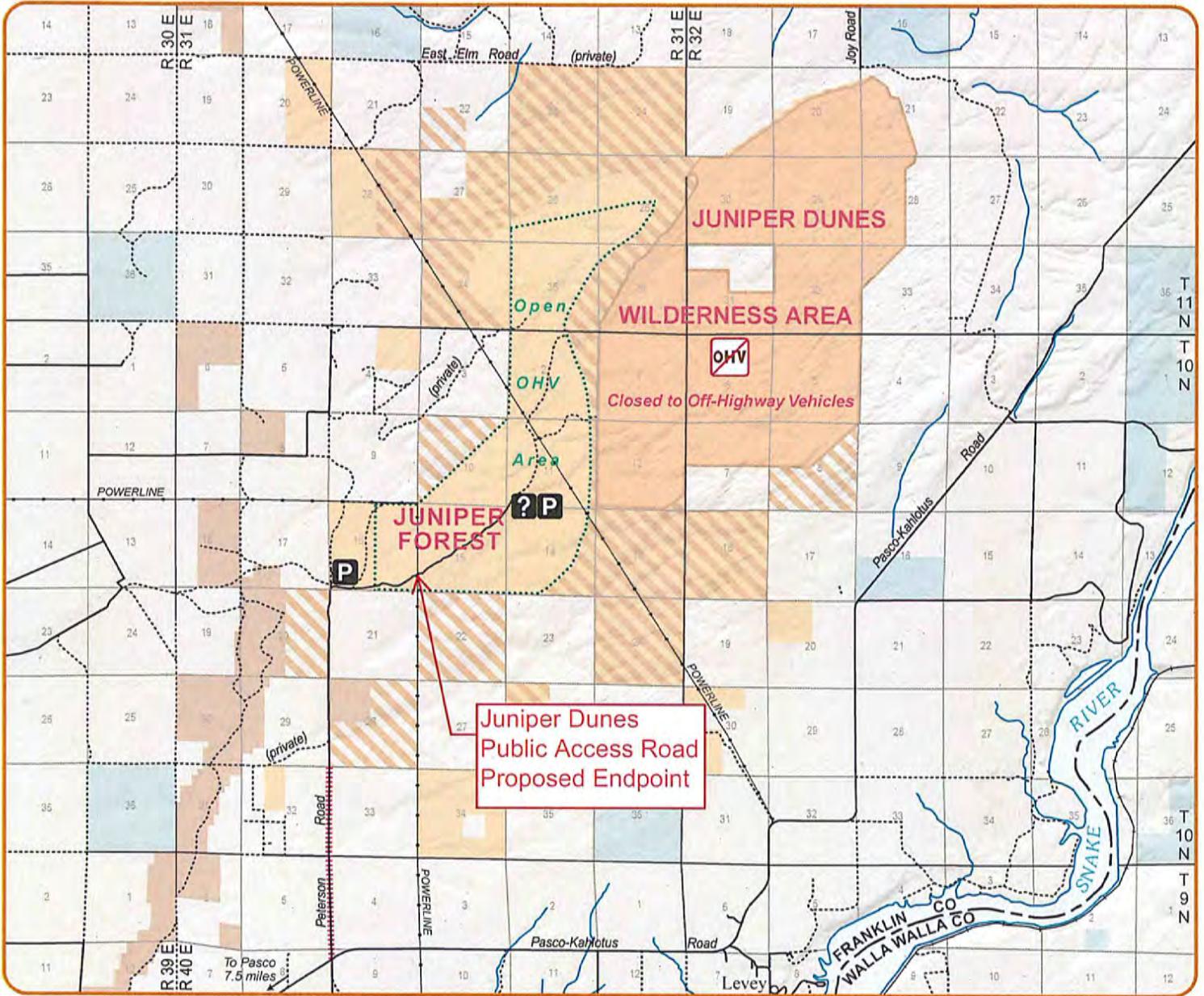
# Juniper Forest

## Recreation Opportunities



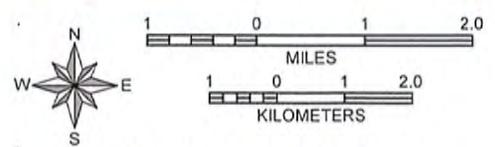
# Juniper Dunes Wilderness Area

## Recreation Opportunities



### LEGEND

<b>Recreation</b>		<b>Administered Land</b>	
<b>?</b> Information		Bureau of Land Management (BLM) (OHV use limited to designated roads and trails)	
<b>P</b> Parking		BLM Wilderness Area (closed to OHVs)	
<b>Transportation</b>		BLM Area of Critical Environmental Concern (OHV use limited to designated roads and trails)	
Improved Road		Bureau of Reclamation	
Other Road or Trail, Access as Designated		Washington Dept. of Natural Resources	
Private Road		Private or Other	
Railroad			



**U. S. Department of the Interior**  
**Bureau of Land Management**  
**Spokane District**  
**1103 N. Fancher**  
**Spokane, WA 99212**  
**(509) 536-1200**

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U.S. Department  
of Transportation

**Federal Highway  
Administration**

Western Federal Lands Highway Division  
610 E. Fifth Street  
Vancouver, WA 98661  
Phone 360-619-7700  
Fax 360-619-7846

June 20, 2014

The Honorable JoDe L. Goudy, Chairperson  
Confederated Tribes and Bands of the Yakama Nation  
401 Fort Road, PO Box 151  
Toppenish, WA 98948

Re: Juniper Dunes Public Access Road, WA Franklin 2013(1)

Dear Chairperson Goudy,

The Federal Highway Administration, Western Federal Lands Highway Division (WFL), in partnership with the Bureau of Land Management (BLM), is seeking comments and/or participation from the Confederated Tribes and Bands of the Yakama Nation regarding the Juniper Dunes Public Access Road project (Franklin County, WA) and Environmental Assessment. The project is in the early planning phases of the National Environmental Policy Act process. The purpose of the project is to provide a legal public access road to the Juniper Dunes Wilderness Area and Juniper Forest, starting at a public road and ending at a staging area adjacent to the Juniper Forest off-highway vehicle area. The project area has not been formally defined, but the location of the proposed end point is Latitude 46 20 45 N, Longitude 118 55 51 W. The project will take place on BLM and private land.

This letter is requesting government-to-government consultation with the Confederated Tribes and Bands of the Yakama Nation. We would gladly meet with you to discuss the project at your Main Agency Offices. Additionally, WFL and Franklin County are holding a public open house on July 31, 2014, at the TRAC Center at 6600 Burden Blvd, in Pasco, WA if you wish to attend. You may also contact us in writing or by email—contact information is at the end of this letter. The WFL Archaeologist will be sending another letter under separate cover to your Tribal Historic Preservation Officer to initiate consultation under Section 106 of the National Historic Preservation Act of 1966.

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Respectfully,



Clara Conner  
Director, Western Federal Lands Highway Division

Enclosures:

Juniper Dunes Purpose and Need  
Project Area Map

Cc:

Johnson Meninick, Confederated Tribes and Bands of the Yakama Nation-Cultural Resources  
Program Manager

Kate Valdez, Confederated Tribes and Bands of the Yakama Nation-Tribal Historic Preservation  
Officer

Elizabeth Sanchey, Confederated Tribes and Bands of the Yakama Nation-Environmental  
Review Coordinator

Keith Wong, WFL Project Manager

Heather Wills, WFL Environmental Manager

## Juniper Dunes Public Access Road Draft Purpose and Need

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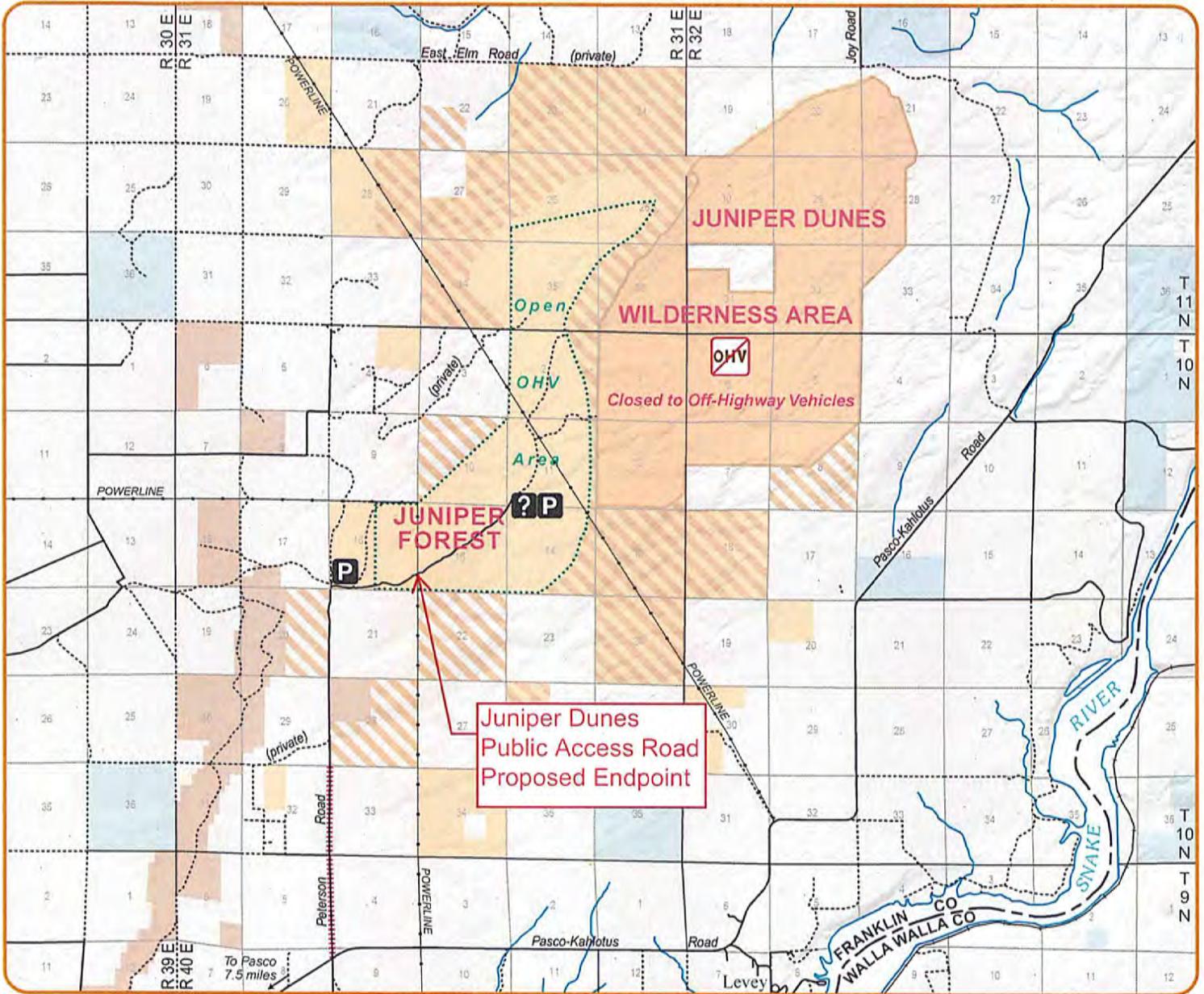
# Juniper Forest

## Recreation Opportunities



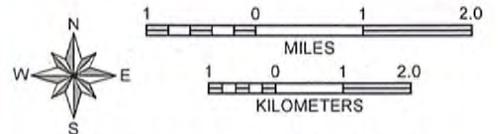
# Juniper Dunes Wilderness Area

## Recreation Opportunities



**LEGEND**

<b>Recreation</b>	<b>Administered Land</b>
<b>?</b> Information	Bureau of Land Management (BLM) <i>(OHV use limited to designated roads and trails)</i>
<b>P</b> Parking	BLM Wilderness Area <i>(closed to OHVs)</i>
<b>Transportation</b>	BLM Area of Critical Environmental Concern <i>(OHV use limited to designated roads and trails)</i>
Improved Road	Bureau of Reclamation
Other Road or Trail, Access as Designated	Washington Dept. of Natural Resources
Private Road	Private or Other
Railroad	



**U. S. Department of the Interior**  
**Bureau of Land Management**  
**Spokane District**  
**1103 N. Fancher**  
**Spokane, WA 99212**  
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The Confederated Tribes of the Colville Reservation  
History/Archaeology Program  
P.O. Box 150, Nespelem, WA 99155

(509) 634-2693  
(509) 643-2694



July 9, 2014

HA: U14-154  
14.0191

Clara Conner, Director  
Western Federal Lands Highway Division  
610 E. Fifth St.  
Vancouver, WA. 98661

RE: Public Access to Juniper Dunes Wilderness Area and Juniper Forest

Clara Conner:

Please be advised your proposed undertaking lies within the traditional territory of the Palus Tribe. The Palus Tribe is a constituent member of and represented by the Confederated Tribes of the Colville Reservation [Colville Confederated Tribes (CCT)]. The CCT is governed by the Colville Business Council (CBC). The CBC delegated to the Tribal Historic Preservation Officer (THPO) the responsibility of representing the CCT with regard to cultural resources management issues throughout the traditional territories of our constituent tribes under Resolution 1996-29. This area includes most of eastern Washington, parts of northeastern Oregon, south central British Columbia, and parts of north central Idaho. In 1996, the CCT also entered into an agreement with the National Park Service to assume state historic preservation officer responsibilities as outlined in Section 101 (d) (2) of the National Historic Preservation Act. The assumption agreement explicitly tasks the THPO to advise and assist Federal and State agencies and local governments in carrying out their historic preservation responsibilities and for the CCT to carry out their responsibilities for review of federal undertakings in regard to cultural resources matters.

We received your letter initiating consultation regarding public access to Juniper Dunes Wilderness Area and Juniper Forest. We look forward to consulting with you on the Area of Potential Effect (APE) and reviewing the archaeological investigation for the APE. Please be aware when defining the Area of Potential Effect (APE), to take into account the auditory, visual, vibration, and olfactory indirect effects to archaeological and traditional cultural properties (TCPs). Please note that cultural resource studies must include all historic property types, traditional sites as well as archaeological sites. Your archaeologist/contractor should consult references not only to identify archaeological sites but also to identify places with Indian names, plant gathering grounds, hunting grounds and spiritually significant places.

These comments are based on information available to us at the time of the project review. We reserve the right to revise our comments as information becomes available. If you have any questions or concerns, please contact Arrow Coyote at (509) 634-2736. Thank you for your time and efforts related to this matter. If you wish to speak to me, my information is below.

Sincerely,

 (Guy Moura)  
for

Guy Moura  
Tribal Historic Preservation Officer  
(509) 634-2695 office; (509) 634-2694 FAX

cc: Dr. Whitlam DAHP  
File (AC)  
Chrono.



U.S. Department  
of Transportation

**Federal Highway  
Administration**

Western Federal Lands Highway Division  
610 E. Fifth Street  
Vancouver, WA 98661  
Phone 360-619-7700  
Fax 360-619-7846

November 14, 2014

In Reply Refer To: HFL-17

Johnson Meninick  
Cultural Resources  
Yakama Nation  
P.O. Box 151  
Toppenish, WA 98948

Re: Juniper Dunes Access Road Project, WA FRANKLIN 2013(1)  
Section 106 No Historic Properties Affected Recommendation

Dear Mr. Meninick:

The Western Federal Lands Highway Division of the Federal Highway Administration (FHWA), in partnership with Franklin County, Washington is proposing to construct a new road to the Juniper Dunes Off-Highway Vehicle area in Franklin County six miles northeast of Pasco, Washington. The proposed work will need to comply with Section 106 of the National Historic Preservation Act (Section 106) and National Environmental Policy Act, thereby warranting a cultural resources identification survey within the area of potential effects (APE). The FHWA defines the APE as encompassing three alternatives (Alternatives 1 Option A, 1 Option B and 2) that are being considered for the new road alignment (Figure 1). The APE is 150 feet on either side of the proposed alternatives. The APE is in Township 9N, Range 31E, Sections 3,4 and 5 and Township 10N, Range 31E, Sections 15, 16, 17, 20, 21, 22, 27, 28, 29, 32, 33 and 34 (Figure 1).

Through a reimbursable agreement with the FHWA, Eastern Washington University (EWU) conducted background research for all three project alternatives and conducted an intensive cultural resources survey within the Alternative 2 APE, the preferred alternative. Enclosed for your review and reference is an electronic copy of the EWU cultural resources report. EWU did not identify any cultural resources within the Alternative 2 APE during their intensive cultural resources survey.

The FHWA would like to request notification if the Yakama Nation believes properties listed on or eligible for the National Register of Historic Places (NRHP) that the Tribe attaches religious or cultural significance may be affected by the proposed project.

If the Yakama Nation does not believe properties listed on or eligible for the NRHP that the Tribe attaches religious or cultural significance may be affected by the proposed project and based on EWU's recommendations, the FHWA recommends that the Juniper Dunes Access Road Project, WA FRANKLIN 2013(1) will result in a No Historic Properties Affected Section 106 effect determination if the new access road is constructed within the Alternative 2 APE.

I appreciate your attention to this request. If you have any questions, or should you require any additional information, please contact me at the above address, by phone at (360) 619-7636, or by e-mail at michael.schurke@dot.gov.

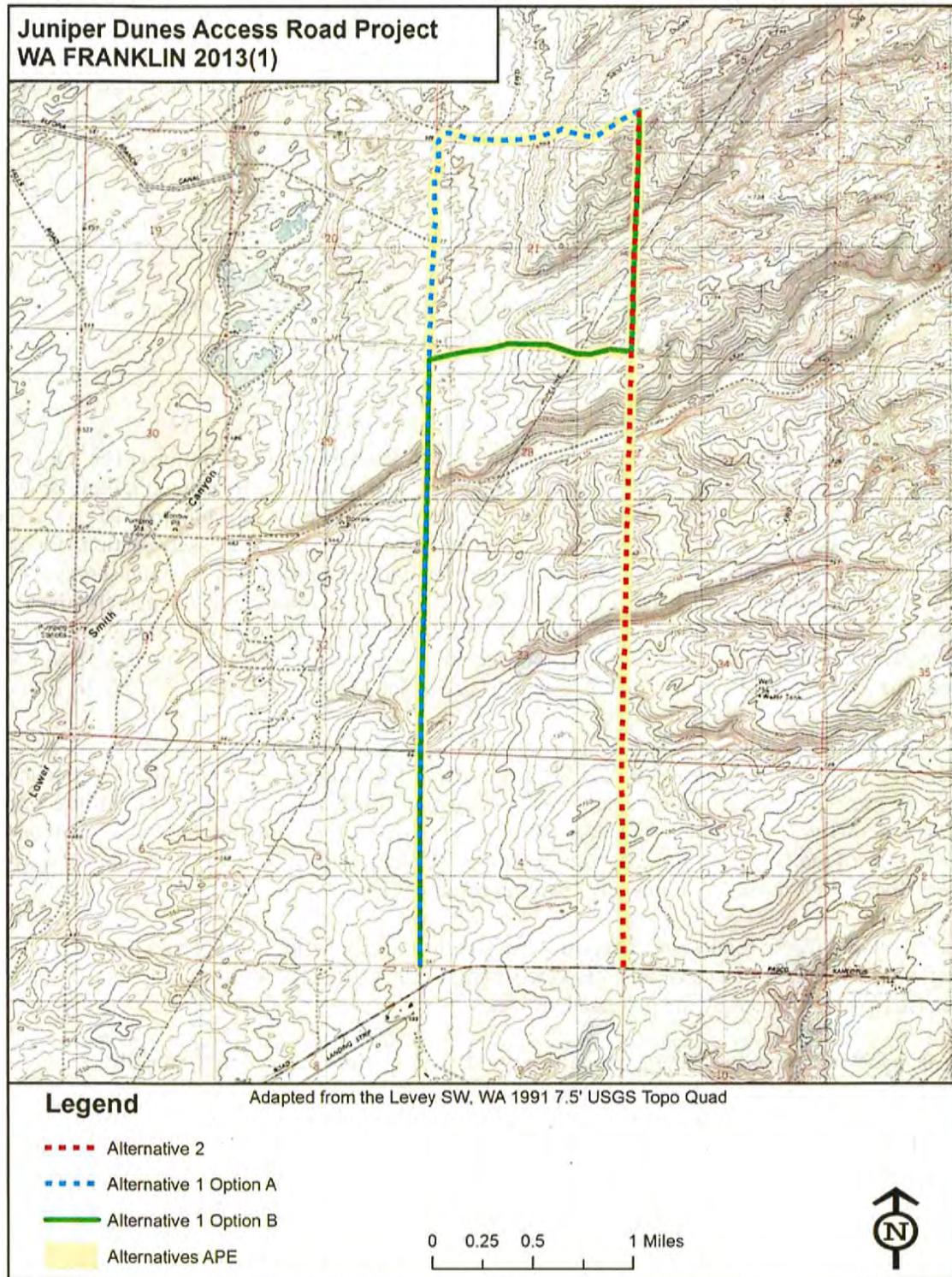
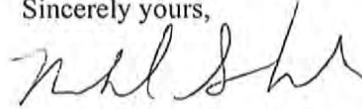


Figure 1. Juniper Dunes Access Road Project APE on a USGS Topo Quad.

November 14, 2014  
Yakama Nation  
Page 3 of 3

Sincerely yours,

A handwritten signature in black ink, appearing to read "Michael Schurke". The signature is written in a cursive style with a large, prominent initial "M".

Michael Schurke, MA, RPA  
Archaeologist

MCS

Enclosures(1)

cc: Seth English-Young, Environmental Protection Specialist, WFLHD  
Keith Wong, Project Manager, WFLHD





U.S. Department  
of Transportation  
**Federal Highway  
Administration**

Western Federal Lands Highway Division  
610 E. Fifth Street  
Vancouver, WA 98661  
Phone 360-619-7700  
Fax 360-619-7846

November 14, 2014

In Reply Refer To: HFL-17

Teara Farrow Ferman  
Cultural Resources  
The Confederated Tribes of the Umatilla  
46411 Timine Way  
Pendleton, OR 97801

Re: Juniper Dunes Access Road Project, WA FRANKLIN 2013(1)  
Section 106 No Historic Properties Affected Recommendation

Dear Ms. Ferman:

The Western Federal Lands Highway Division of the Federal Highway Administration (FHWA), in partnership with Franklin County, Washington is proposing to construct a new road to the Juniper Dunes Off-Highway Vehicle area in Franklin County six miles northeast of Pasco, Washington. The proposed work will need to comply with Section 106 of the National Historic Preservation Act (Section 106) and National Environmental Policy Act, thereby warranting a cultural resources identification survey within the area of potential effects (APE). The FHWA defines the APE as encompassing three alternatives (Alternatives 1 Option A, 1 Option B and 2) that are being considered for the new road alignment (Figure 1). The APE is 150 feet on either side of the proposed alternatives. The APE is in Township 9N, Range 31E, Sections 3,4 and 5 and Township 10N, Range 31E, Sections 15, 16, 17, 20, 21, 22, 27, 28, 29, 32, 33 and 34 (Figure 1).

Through a reimbursable agreement with the FHWA, Eastern Washington University (EWU) conducted background research for all three project alternatives and conducted an intensive cultural resources survey within the Alternative 2 APE, the preferred alternative. Enclosed for your review and reference is an electronic copy of the EWU cultural resources report. EWU did not identify any cultural resources within the Alternative 2 APE during their intensive cultural resources survey.

The FHWA would like to request notification if the Confederated Tribes of the Umatilla believe properties listed on or eligible for the National Register of Historic Places (NRHP) that the Tribe attaches religious or cultural significance may be affected by the proposed project.

If the Confederated Tribes of the Umatilla do not believe properties listed on or eligible for the NRHP that the Tribe attaches religious or cultural significance may be affected by the proposed project and based on EWU's recommendations, the FHWA recommends that the Juniper Dunes Access Road Project, WA FRANKLIN 2013(1) will result in a No Historic Properties Affected Section 106 effect determination if the new access road is constructed within the Alternative 2 APE.

I appreciate your attention to this request. If you have any questions, or should you require any additional information, please contact me at the above address, by phone at (360) 619-7636, or by e-mail at michael.schurke@dot.gov.

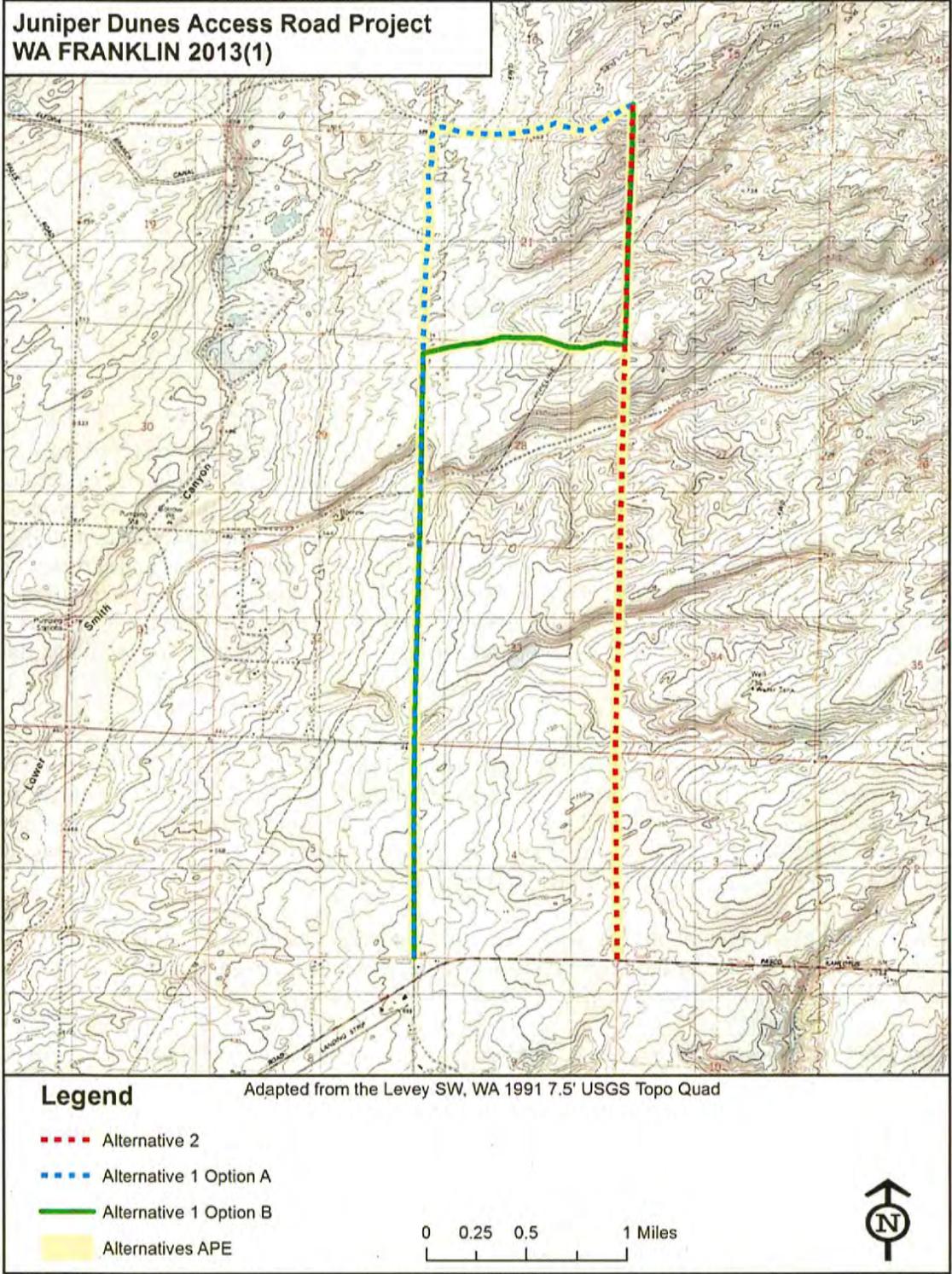
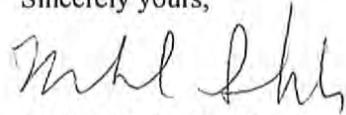


Figure 1. Juniper Dunes Access Road Project APE on a USGS Topo Quad.

November 14, 2014  
Confederated Tribes of the Umatilla  
Page 3 of 3

Sincerely yours,

A handwritten signature in black ink, appearing to read "Michael Schurke". The signature is written in a cursive style with a large initial "M".

Michael Schurke, MA, RPA  
Archaeologist

MCS

Enclosures(1)

cc: Seth English-Young, Environmental Protection Specialist, WFLHD  
Keith Wong, Project Manager, WFLHD





U.S. Department  
of Transportation

**Federal Highway  
Administration**

Western Federal Lands Highway Division  
610 E. Fifth Street  
Vancouver, WA 98661  
Phone 360-619-7700  
Fax 360-619-7846

November 14, 2014

In Reply Refer To: HFL-17

Arrow Coyote  
History/Archaeology Program  
The Confederated Tribes of the Colville Reservation  
P.O. Box 150  
Nespelem, WA 99155

Re: Juniper Dunes Access Road Project, WA FRANKLIN 2013(1)  
Section 106 No Historic Properties Affected Recommendation

Dear Ms. Coyote:

The Western Federal Lands Highway Division of the Federal Highway Administration (FHWA), in partnership with Franklin County, Washington is proposing to construct a new road to the Juniper Dunes Off-Highway Vehicle area in Franklin County six miles northeast of Pasco, Washington. The proposed work will need to comply with Section 106 of the National Historic Preservation Act (Section 106) and National Environmental Policy Act, thereby warranting a cultural resources identification survey within the area of potential effects (APE). The FHWA defines the APE as encompassing three alternatives (Alternatives 1 Option A, 1 Option B and 2) that are being considered for the new road alignment (Figure 1). The APE is 150 feet on either side of the proposed alternatives. The APE is in Township 9N, Range 31E, Sections 3,4 and 5 and Township 10N, Range 31E, Sections 15, 16, 17, 20, 21, 22, 27, 28, 29, 32, 33 and 34 (Figure 1).

Through a reimbursable agreement with the FHWA, Eastern Washington University (EWU) conducted background research for all three project alternatives and conducted an intensive cultural resources survey within the Alternative 2 APE, the preferred alternative. Enclosed for your review and reference is an electronic copy of the EWU cultural resources report. EWU did not identify any cultural resources within the Alternative 2 APE during their intensive cultural resources survey.

The FHWA would like to request notification if the Confederated Tribes of the Colville Reservation believe properties listed on or eligible for the National Register of Historic Places (NRHP) that the Tribe attaches religious or cultural significance may be affected by the proposed project.

If the Confederated Tribes of the Colville Reservation do not believe properties listed on or eligible for the NRHP that the Tribe attaches religious or cultural significance may be affected by the proposed project and based on EWU's recommendations, the FHWA recommends that the Juniper Dunes Access Road Project, WA FRANKLIN 2013(1) will result in a No Historic Properties Affected Section 106 effect determination if the new access road is constructed within the Alternative 2 APE.

I appreciate your attention to this request. If you have any questions, or should you require any additional information, please contact me at the above address, by phone at (360) 619-7636, or by e-mail at michael.schurke@dot.gov.

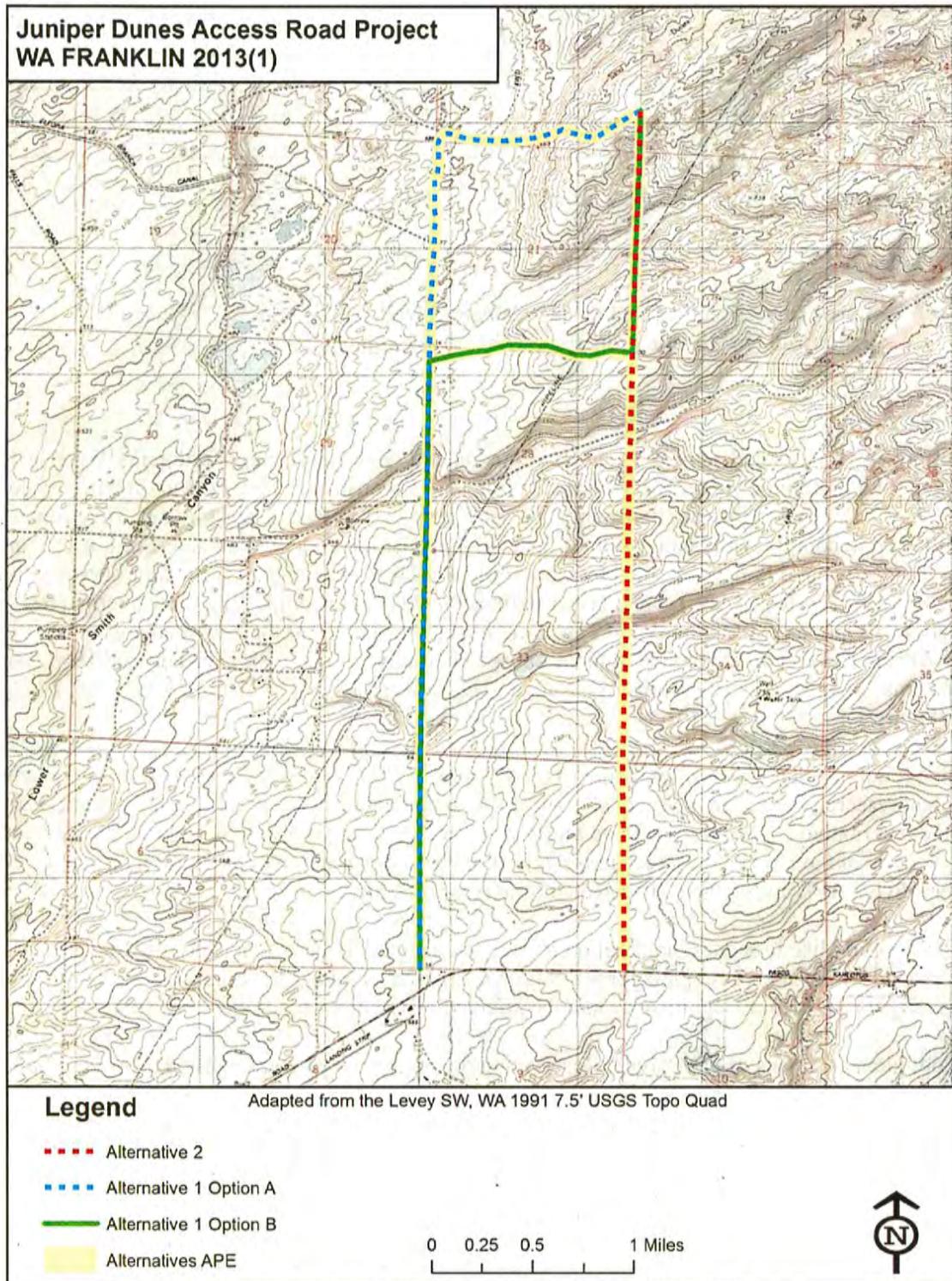
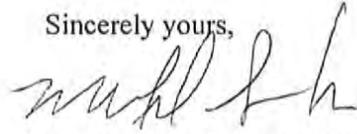


Figure 1. Juniper Dunes Access Road Project APE on a USGS Topo Quad.

November 14, 2014  
Confederated Tribes of the Colville Reservation  
Page 3 of 3

Sincerely yours,

A handwritten signature in black ink, appearing to read 'msh', written over the typed name.

Michael Schurke, MA, RPA  
Archaeologist

MCS

Enclosures(1)

cc: Seth English-Young, Environmental Protection Specialist, WFLHD  
Keith Wong, Project Manager, WFLHD



**From:** Schurke, Michael (FHWA)  
**To:** [Teara Farrow Ferman \(TearaFarrowFerman@ctuir.org\)](mailto:TearaFarrowFerman@ctuir.org)  
**Subject:** Juniper Dunes Access Road Project  
**Date:** Thursday, December 18, 2014 10:10:00 AM  
**Attachments:** [11\\_14\\_14\\_Juniper\\_Dunes\\_106\\_letter\\_to\\_Umatilla.pdf](#)

---

Hi Teara,

On November 14, 2014, I sent a letter to you requesting whether the CTUIR believes cultural resources that are of religious and cultural significance to the Tribe may be affected by the FHWA's proposed Juniper Dunes Access Road Project. I've attached this letter for your reference. Included with my letter was a copy of Eastern Washington University's cultural resources report. I thought I would follow up with an email to see if the Tribe has any concerns.

Thanks,

Mike

Mike Schurke, M.A., RPA  
Archaeologist  
USDOT - Federal Highway Administration  
Western Federal Lands Highway Division  
610 East Fifth Street  
Vancouver, WA 98661  
Phone: 360-619-7636  
Fax: 360-619-7846  
E-mail: [michael.schurke@dot.gov](mailto:michael.schurke@dot.gov)

**From:** [Amy Senn](#)  
**To:** [Schurke, Michael \(FHWA\)](#)  
**Cc:** [Catherine Dickson](#)  
**Subject:** RE: Juniper Dunes Access Road Project  
**Date:** Friday, December 19, 2014 3:33:29 PM

---

Hi Mike,

The CTUIR CRPP will defer to other interested tribes with regard to this project.

Regards,

Amy K. Senn, M.S.  
Archaeologist  
Cultural Resources Protection Program  
Department of Natural Resources  
Confederated Tribes of the Umatilla Indian Reservation  
46411 Timine Way  
Pendleton, OR 97801  
(541) 429-7214

---

**From:** [Michael.Schurke@dot.gov](mailto:Michael.Schurke@dot.gov) [<mailto:Michael.Schurke@dot.gov>]  
**Sent:** Thursday, December 18, 2014 10:10 AM  
**To:** Teara Farrow Ferman  
**Subject:** Juniper Dunes Access Road Project

Hi Teara,

On November 14, 2014, I sent a letter to you requesting whether the CTUIR believes cultural resources that are of religious and cultural significance to the Tribe may be affected by the FHWA's proposed Juniper Dunes Access Road Project. I've attached this letter for your reference. Included with my letter was a copy of Eastern Washington University's cultural resources report. I thought I would follow up with an email to see if the Tribe has any concerns.

Thanks,

Mike

Mike Schurke, M.A., RPA  
Archaeologist  
USDOT - Federal Highway Administration  
Western Federal Lands Highway Division  
610 East Fifth Street  
Vancouver, WA 98661  
Phone: 360-619-7636  
Fax: 360-619-7846  
E-mail: [michael.schurke@dot.gov](mailto:michael.schurke@dot.gov)

The opinions expressed by the author are his or her own and are not necessarily those of the Confederated Tribes of the Umatilla Indian Reservation. The information, contents and attachments in this email are Confidential and Private.

**From:** Schurke, Michael (FHWA)  
**To:** [johnson@yakama.com](mailto:johnson@yakama.com)  
**Subject:** Juniper Dunes Access Road Project  
**Date:** Thursday, December 18, 2014 10:15:00 AM  
**Attachments:** [11\\_14\\_14\\_Juniper\\_Dunes\\_106\\_letter\\_to\\_Yakama.pdf](#)

---

Hi Johnson,

On November 14, 2014, I sent a letter to you requesting whether the Yakama Nation believes cultural resources that are of religious and cultural significance to the Tribe may be affected by the FHWA's proposed Juniper Dunes Access Road Project. I've attached this letter for your reference. Included with my letter was a copy of Eastern Washington University's cultural resources report. I thought I would follow up with an email to see if the Tribe has any concerns.

Thanks,

Mike

Mike Schurke, M.A., RPA  
Archaeologist  
USDOT - Federal Highway Administration  
Western Federal Lands Highway Division  
610 East Fifth Street  
Vancouver, WA 98661  
Phone: 360-619-7636  
Fax: 360-619-7846  
E-mail: [michael.schurke@dot.gov](mailto:michael.schurke@dot.gov)

**From:** [Corrine Camuso](#)  
**To:** [Schurke, Michael \(FHWA\)](#)  
**Cc:** [Johnson Meninick](#)  
**Subject:** Juniper Dunes Access Road Project  
**Date:** Thursday, January 08, 2015 1:54:01 PM

---

Hi Mike,

Johnson asked me to respond to your request regarding the Juniper Dunes Access Road project. CRP has no comments regarding the project and no further work is requested. Thank you for following up with us.

Regards,  
Corrine

Corrine Camuso  
Yakama Nation  
Cultural Resources Program Archaeologist  
Office 509-865-5121 ext 4776



U.S. Department  
of Transportation

**Federal Highway  
Administration**

Western Federal Lands Highway Division  
610 E. Fifth Street  
Vancouver, WA 98661  
Phone 360-619-7700  
Fax 360-619-7846

November 13, 2014

In Reply Refer To: HFL-17

Matthew Sterner  
Transportation Archaeologist  
Washington Department of Archaeology and Historic Preservation  
1063 South Capitol Way, Suite 106  
Olympia, WA 98501

Re: Juniper Dunes Access Road Project, WA FRANKLIN 2013(1)  
Section 106 No Historic Properties Affected Recommendation

Dear Matthew:

The Western Federal Lands Highway Division of the Federal Highway Administration (FHWA), in partnership with Franklin County, Washington is proposing to construct a new road to the Juniper Dunes Off-Highway Vehicle area in Franklin County six miles northeast of Pasco, Washington. The proposed work will need to comply with Section 106 of the National Historic Preservation Act (Section 106) and National Environmental Policy Act, thereby warranting a cultural resources identification survey within the area of potential effects (APE). The FHWA defines the APE as encompassing three alternatives (Alternatives 1 Option A, 1 Option B and 2) that are being considered for the new road alignment (Figure 1). The APE is 150 feet on either side of the proposed alternatives. The APE is in Township 9N, Range 31E, Sections 3,4 and 5 and Township 10N, Range 31E, Sections 15, 16, 17, 20, 21, 22, 27, 28, 29, 32, 33 and 34 (Figure 1).

Through a reimbursable agreement with the FHWA, Eastern Washington University (EWU) conducted background research for all three project alternatives and conducted an intensive cultural resources survey within the Alternative 2 APE, the preferred alternative. Enclosed for your review and reference is a hard copy of the EWU cultural resources report, the report cover sheet and a PDF of the report on a compact disk. EWU did not identify any cultural resources within the Alternative 2 APE during their intensive cultural resources survey.

Based on the information above, the FHWA recommends that the Juniper Dunes Access Road Project, WA FRANKLIN 2013(1), will result in a No Historic Properties Affected Section 106 effect determination if the new access road is constructed within the Alternative 2 APE. **The FHWA requests the Washington State Historic Preservation Officer's concurrence with this recommendation.**

I appreciate your attention to this request. If you have any questions, or should you require any additional information, please contact me at the above address, by phone at (360) 619-7636, or by e-mail at michael.schurke@dot.gov.

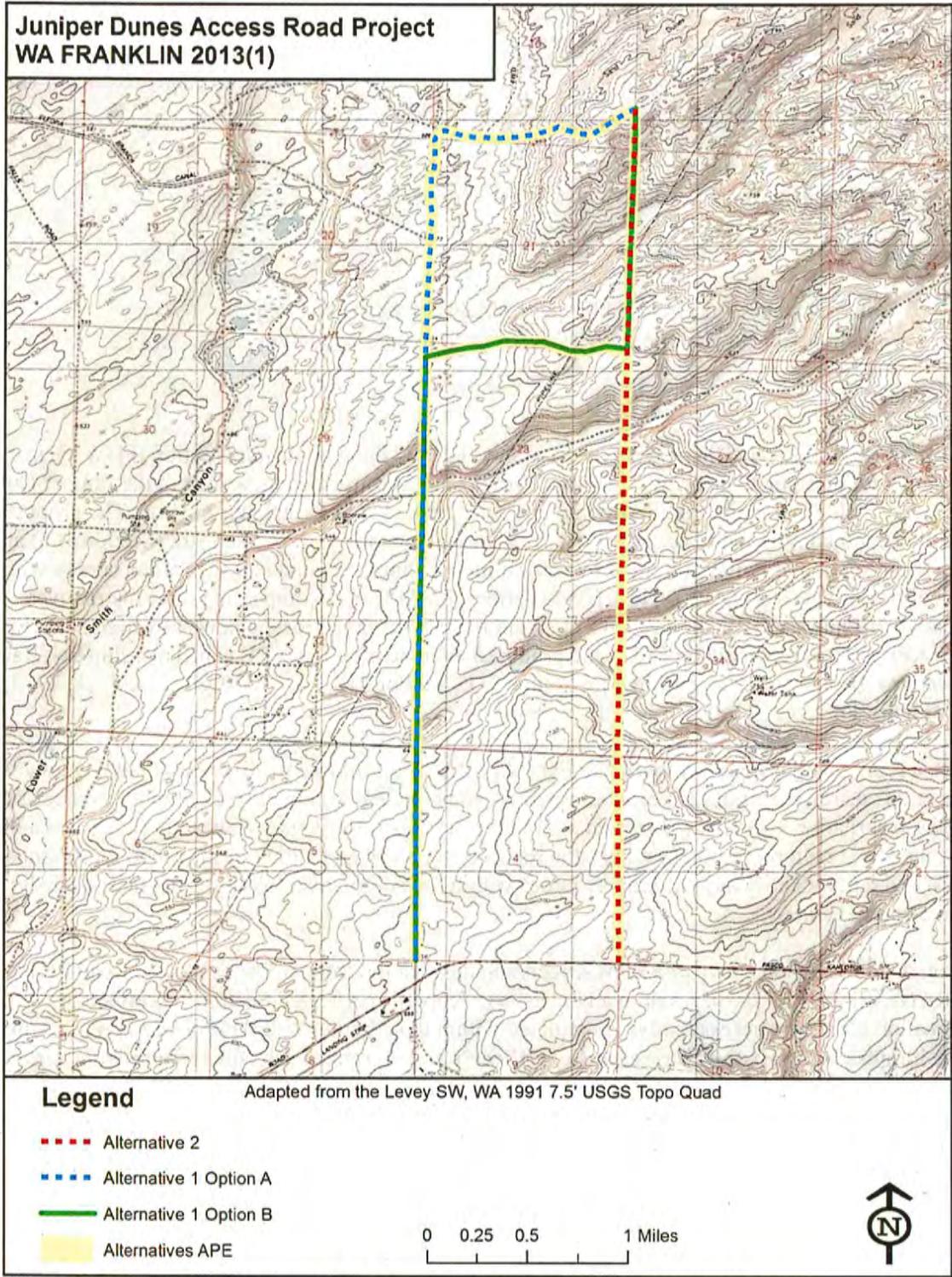


Figure 1. Juniper Dunes Access Road Project APE on a USGS Topo Quad.

November 13, 2014  
Washington Department of Archaeology and Historic Preservation  
Page 3 of 3

Sincerely yours,

A handwritten signature in black ink, appearing to read "Michael Schurke". The signature is written in a cursive style with a large initial "M" and a long, sweeping underline.

Michael Schurke, MA, RPA  
Archaeologist

MCS

Enclosures(3)

cc: Seth English-Young, Environmental Protection Specialist, WFLHD  
Keith Wong, Project Manager, WFLHD





Allyson Brooks Ph.D., Director  
State Historic Preservation Officer

December 11, 2014

Mr. Michael Schurke  
Cultural/Environmental Protection Specialist  
Western Federal Lands Highway Division (FHWA)  
610 E 5th Street  
Vancouver, WA 98661

In future correspondence please refer to:  
Log: 121114-29-FHWA  
Property: Juniper Dunes Access Road  
Re: Receipt of CRM Report, No Historic Properties

Dear Mr. Schurke:

Thank you for contacting our office and providing a copy of the cultural resources survey report completed by AHS. We concur with their professional recommendations and your finding of no historic properties affected for the project.

We would appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4).

These comments are based on the information available at the time of this review and on the behalf of the State Historic Preservation Officer in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36CFR800.

Should additional information become available, our assessment may be revised. In the event that archaeological or historic materials are discovered during project activities, work in the immediate vicinity must stop, the area secured, and this office and the concerned tribes notified.

Thank you for the opportunity to review and comment. If you have any questions, please contact me.

Sincerely,

Matthew Sterner, M.A.  
Transportation Archaeologist  
(360) 586-3082  
matthew.sterner@dahp.wa.gov



Natural Resources Building  
1111 Washington St. S.E.  
Olympia, WA 98501

P.O. Box 40917  
Olympia, WA 98504-0917



(360) 902-3000  
TTY (360) 902-1996  
Fax: (360) 902-3026

E-mail: [info@rco.wa.gov](mailto:info@rco.wa.gov)  
Web site: [www.rco.wa.gov](http://www.rco.wa.gov)

STATE OF WASHINGTON

RECREATION AND CONSERVATION OFFICE

January 28, 2015

Seth English-Young  
Environmental Specialist  
Federal Highway Administration  
Western Federal Lands  
610 East Fifth Street  
Vancouver, WA 98661

Re: Juniper Dunes access / section 6(f) evaluation

Dear Mr. English-Young:

I am responding to your January 21, 2015 inquiry concerning properties with section 6(f) designation, which could be affected by a proposed project constructing a public access road to the Juniper Dunes Wilderness and off-highway vehicle areas (Juniper Dunes). The alternatives were depicted in figure 1-1, Juniper Dunes Public Access Project Alternatives. After a search of our database and records, to the best of our knowledge no state-funded section 6(f) properties will be affected by the proposed alignments depicted in the figure provided.

I would also like to advise you that the State Recreation and Conservation Office manages several other grant programs that have similar anti-conversion requirements provided by section 6(f). Our research considered these state programs as well. To the best of our knowledge, there are no state-grant assisted properties that will be affected by the proposed alignments depicted in the figure provided.

Thank you for the opportunity review and comment on this proposed action. If you have further questions, please contact me at [darrell.jennings@rco.wa.gov](mailto:darrell.jennings@rco.wa.gov) or call (360) 902-3020.

Sincerely,

A handwritten signature in black ink, appearing to read "Darrell Jennings".

Darrell Jennings  
Senior Grants Manager

cc: Myra Barker, RCO Grants Compliance Specialist



**From:** [Ramsay, Heather](#)  
**To:** [English-Young, Seth \(FHWA\)](#)  
**Cc:** [David Siegenthaler](#)  
**Subject:** Re: Juniper Dunes 6(f) request  
**Date:** Friday, January 30, 2015 11:22:21 AM

---

Okay. I don't see any LWCF or UPARR sites around your project area either. I can see how the state's response was confusing but their conclusion is solid. I've cc'd my colleague who handles the Federal Lands to Parks Program (FLP) just in case, but I think given the ownership in the area it's unlikely there are FLP sites there either. Still, I can't speak conclusively on his behalf.

Thanks for checking in,

Heather

---

Funding and Protecting Parks Where you Live

Heather Ramsay, Program Officer  
National Park Service, State & Local Assistance Programs  
909 First Avenue, Seattle, WA 98104-1060  
206.220.4123 - [www.nps.gov/lwcf](http://www.nps.gov/lwcf) or /uprr  
Follow us on Twitter @NPS\_state\_LWCF

On Wed, Jan 28, 2015 at 4:48 PM, <[seth.english-young@dot.gov](mailto:seth.english-young@dot.gov)> wrote:

Ownership varies. There is mainly BLM and private. A small area of one of the alternatives is US Bureau of Reclamation.

There will be no transfer of ownership of BLM property. Franklin County would have an easement for the road that would be on BLM property. The recreation support facility point is interesting—I am not too familiar with 6(f), so I didn't know that. I would think it is certainly a recreation support facility—the entire purpose of the road is to access the recreation area.

Thanks,  
Seth

**From:** Ramsay, Heather [mailto:[heather\\_ramsay@nps.gov](mailto:heather_ramsay@nps.gov)]  
**Sent:** Wednesday, January 28, 2015 4:43 PM  
**To:** English-Young, Seth (FHWA)  
**Subject:** Re: Juniper Dunes 6(f) request

One question that would help - who owns the property over which the new road

would be going? Is it all BLM?

And generally, unless there was a transfer of ownership from our sub-grantee's control (in whole or in part), something like this would probably be considered a recreation support facility and as such compatible with LWCF 6(f) restrictions even if it is on land subject to our jurisdiction.

---

Funding and Protecting Parks Where you Live

Heather Ramsay, Program Officer

National Park Service, State & Local Assistance Programs

909 First Avenue, Seattle, WA 98104-1060

206.220.4123 - [www.nps.gov/lwcf](http://www.nps.gov/lwcf) or /uprr

Follow us on Twitter @NPS\_state\_LWCF

On Wed, Jan 28, 2015 at 3:43 PM, <[seth.english-young@dot.gov](mailto:seth.english-young@dot.gov)> wrote:

**Heather,**

***Thank you for taking the time to look at this. Below is the text of the email I sent to the State of Washington Recreation and Conservation Office. Attached are two maps I sent to them and a letter I got in response. My question at the bottom of this email still applies—is this project subject to 6(f)? Thanks. Seth***

As a follow up to our phone call, I have attached the following documents:

- BLM map of the “Juniper Dunes” area
- Map of the EA alternatives (Alternative 1A, 1B, 1C, and 2)

To give you a frame of reference for the BLM map, the alternatives start on Pasco-Kahlotus Road and end just under the “O” in “Juniper Forest” on the BLM map. Alternative 1A, 1B, and 1C go up Peterson Road, and Alternative 2 is along the section line 1 mile east of Peterson Road (where it says “Powerline” in the BLM Map).

Here is a brief project description:

***The Western Federal Lands Division of the Federal Highway Administration, in partnership with the Bureau of Land Management and Franklin County, is planning to construct a public access road to the Juniper Dunes Wilderness and off-highway vehicle areas (Juniper Dunes).***

***Juniper Dunes is located approximately 10 miles northeast of Pasco, Washington in Franklin County. Juniper Dunes is used primarily for off-highway vehicles (OHVs), but is also used for picnicking and camping, and some hiking, horseback riding, and hunting. Currently, the 19,600 acres of publically-owned land in Juniper Dunes is accessed by Peterson Road, which intersects with Pasco-Kahlotus Road. Portions of Peterson Road are private with no access easement.***

***Multiple alternatives are being analyzed in this EA for access to Juniper Dunes. All build alternatives intersect with Pasco-Kahlotus Road at the current intersection with Peterson Road (Mile Post (MP) 5.95), or along the section line one mile east of Peterson Road (MP 6.95). All build alternatives end at a designated endpoint located in Juniper Dunes OHV area approximately 4.2 miles north of Pasco-Kahlotus Road along the section line one mile east.***

My question is, is this project subject to Section 6(f)?

Seth English-Young

Environmental Specialist

Federal Highway Administration

Western Federal Lands

610 East Fifth Street

Vancouver, WA 98661

360-619-7803



**From:** [Siegenthaler, David](#)  
**To:** [English-Young, Seth \(FHWA\)](#)  
**Cc:** [Heather Ramsay](#)  
**Subject:** Re: Juniper Dunes 6(f) request  
**Date:** Friday, January 30, 2015 12:55:35 PM

---

According to my records, there are no Federal Lands to Parks properties in the area.

Thanks for checking, Heather.

David

David Siegenthaler  
Pacific West Region  
National Park Service  
333 Bush Street, Suite 500  
San Francisco, CA 94104-2828  
V: 415-623-2334  
F: 415-623-2387

Federal Lands to Parks  
Land and Water Conservation Fund  
Urban Park and Recreation Recovery Program  
National Historic Lighthouse Preservation Program

On Fri, Jan 30, 2015 at 11:50 AM, <[seth.english-young@dot.gov](mailto:seth.english-young@dot.gov)> wrote:

Thank you Heather.

I look forward to hearing regarding FLP.

Seth

**From:** Ramsay, Heather [mailto:[heather\\_ramsay@nps.gov](mailto:heather_ramsay@nps.gov)]  
**Sent:** Friday, January 30, 2015 11:22 AM  
**To:** English-Young, Seth (FHWA)  
**Cc:** David Siegenthaler  
**Subject:** Re: Juniper Dunes 6(f) request

Okay. I don't see any LWCF or UPARR sites around your project area either. I can see how the state's response was confusing but their conclusion is solid. I've cc'd my colleague who handles the Federal Lands to Parks Program (FLP) just in case, but I think given the ownership in the area it's unlikely there are FLP sites there either. Still, I can't speak conclusively on his behalf.

Thanks for checking in,

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Funding and Protecting Parks Where you Live

Heather Ramsay, Program Officer

National Park Service, State & Local Assistance Programs

909 First Avenue, Seattle, WA 98104-1060

206.220.4123 - [www.nps.gov/lwcf](http://www.nps.gov/lwcf) or /uprr

Follow us on Twitter @NPS\_state\_LWCF

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Thanks,  
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**Sent:** Wednesday, January 28, 2015 4:43 PM  
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**Subject:** Re: Juniper Dunes 6(f) request

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---

Funding and Protecting Parks Where you Live

Heather Ramsay, Program Officer

National Park Service, State & Local Assistance Programs

909 First Avenue, Seattle, WA 98104-1060

206.220.4123 - [www.nps.gov/lwcf](http://www.nps.gov/lwcf) or /uprr

Follow us on Twitter @NPS\_state\_LWCF

On Wed, Jan 28, 2015 at 3:43 PM, <[seth.english-young@dot.gov](mailto:seth.english-young@dot.gov)> wrote:

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Seth English-Young

Environmental Specialist

Federal Highway Administration

Western Federal Lands

610 East Fifth Street

Vancouver, WA 98661

360-619-7803





U.S. Department  
of Transportation

**Federal Highway  
Administration**

Western Federal Lands Highway Division  
610 E. Fifth Street  
Vancouver, WA 98661  
Phone 360-619-7700  
Fax 360-619-7846

July 1, 2014

Linda Clark  
BLM Spokane District Office, Field Office Manager  
1103 N. Fancher Road  
Spokane Valley, WA 99212

Re: Invitation to Become Participating Agency and Cooperating Agency on Juniper Dunes  
Public Access Road, WA Franklin 2013(1)

Dear Ms. Clark,

The Federal Highway Administration (FHWA), Western Federal Lands Highway Division (WFL), is initiating an Environmental Assessment for the Juniper Dunes Public Access Road project. The purpose of the project is to provide a legal public access road to the Juniper Dunes Wilderness Area and Juniper Forest, starting at a public road and ending at a staging area adjacent to the Juniper Forest off-highway vehicle area. The project area has not been formally defined, but the location of the proposed end point is Latitude 46 20 45 N, Longitude 118 55 51 W. The project will take place on BLM and private land.

The BLM has been identified as an agency that may have an interest in the project because it accesses, and will partially be constructed on, BLM property. With this letter, we extend your agency an invitation to become a participating agency and cooperating agency with the FHWA in the development of the Environmental Assessment for the subject project. Pursuant to 23 USC 139, this designation does not imply that your agency supports the project or has any jurisdiction over, or special expertise with respect to evaluation of, the project.

Participating agencies are responsible to identify, as early as practicable, any issues of concern regarding the project's potential environmental or socioeconomic impacts that could substantially delay or prevent an agency from granting a permit or other approval that is needed for the project. We suggest that your agency's role in the development of the above project should include the following as they relate to your area of expertise:

1. Provide meaningful and early input on defining the purpose and need, determining the range of alternatives to be considered, and the methodologies and level of detail required in the alternatives analysis.
2. Participate in coordination meetings and joint field reviews as appropriate.
3. Timely review and comment on the pre-draft or pre-final environmental documents to reflect the views and concerns of your agency on the adequacy of the document, alternatives considered, and the anticipated impacts and mitigation.

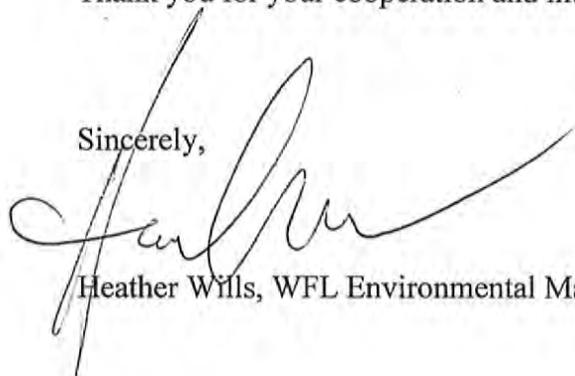
Please respond to FHWA in writing with an acceptance or denial of the invitation prior to **July 31, 2014**. If your agency declines, the response should state your reason for declining the invitation. Pursuant to 23 USC 139, any Federal agency that chooses to decline the invitation to be a participating agency must specifically state in its response that it:

- Has no jurisdiction or authority with respect to the project;
- Has no expertise or information relevant to the project; and
- Does not intend to submit comments on the project.

If you have any questions or would like to discuss in more detail the project or our agencies' respective roles and responsibilities during the preparation of this Environmental Assessment, please contact Seth English-Young at 360-619-7803 or [seth.english-young@dot.gov](mailto:seth.english-young@dot.gov).

Thank you for your cooperation and interest in this project.

Sincerely,



Heather Wills, WFL Environmental Manager

Enclosures:  
Project Area Map

Cc:  
Keith Wong, WFL Project Manager  
Mark Hatchel, BLM Realty Specialist



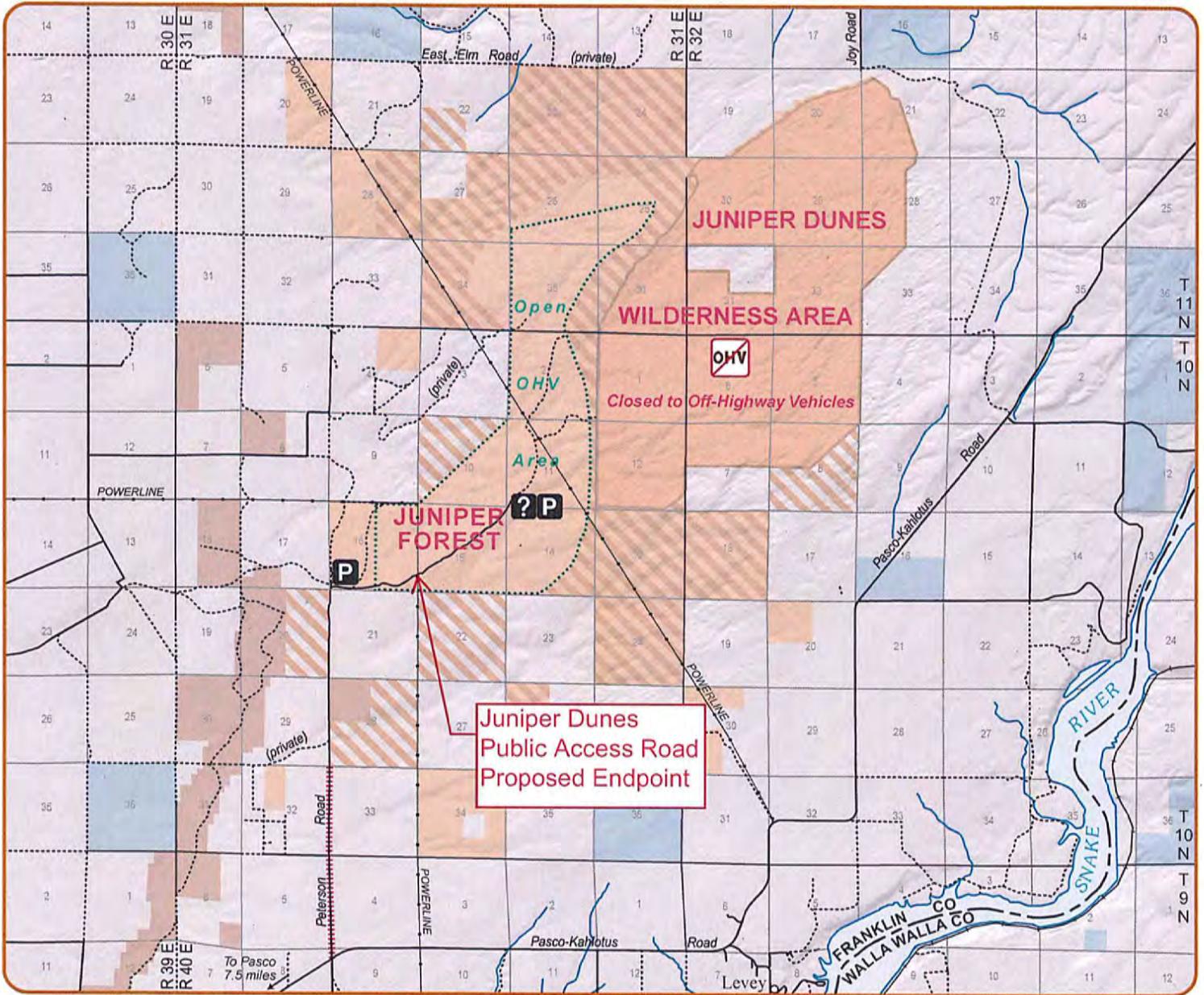
# Juniper Forest

## Recreation Opportunities



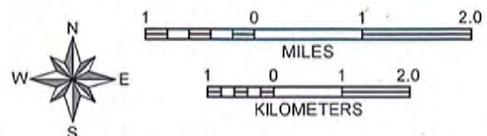
# Juniper Dunes Wilderness Area

## Recreation Opportunities



### LEGEND

<b>Recreation</b>	<b>Administered Land</b>
Information	Bureau of Land Management (BLM) (OHV use limited to designated roads and trails)
Parking	BLM Wilderness Area (closed to OHVs)
<b>Transportation</b>	BLM Area of Critical Environmental Concern (OHV use limited to designated roads and trails)
Improved Road	Bureau of Reclamation
Other Road or Trail, Access as Designated	Washington Dept. of Natural Resources
Private Road	Private or Other
Railroad	



**U. S. Department of the Interior**  
**Bureau of Land Management**  
**Spokane District**  
**1103 N. Fancher**  
**Spokane, WA 99212**  
**(509) 536-1200**

It is unlawful to trespass on private lands. State hunting and fishing regulations apply to private lands. Landowners are not required to post or fence their lands. Check with private landowners before entering their property.



U.S. Department  
of Transportation  
**Federal Highway  
Administration**

Western Federal Lands Highway Division  
610 E. Fifth Street  
Vancouver, WA 98661  
Phone 360-619-7700  
Fax 360-619-7846

July 8, 2014

Franklin County Board of County Commissioners  
1016 N 4<sup>th</sup> Ave  
Pasco, WA 99301

Re: Invitation to Become Participating Agency and Cooperating Agency on Juniper Dunes  
Public Access Road, WA Franklin 2013(1)

Dear Franklin County Commissioners,

The Federal Highway Administration (FHWA), Western Federal Lands Highway Division (WFL), is initiating an Environmental Assessment for the Juniper Dunes Public Access Road project. The purpose of the project is to provide a legal public access road to the Juniper Dunes Wilderness Area and Juniper Forest, starting at a public road and ending at a staging area adjacent to the Juniper Forest off-highway vehicle area. The project area has not been formally defined, but the location of the proposed end point is Latitude 46 20 45 N, Longitude 118 55 51 W. The project will take place on BLM and private land.

Franklin County has been identified as an agency that may have an interest in the project because Franklin County will operate and maintain the facility. With this letter, we extend your agency an invitation to become a participating agency and cooperating agency with the FHWA in the development of the Environmental Assessment for the subject project. This invitation is based on guidance from a 1999 Council on Environmental Quality memo titled *Designation of Non-Federal Agencies to be Cooperating Agencies in Implementing the Procedural Requirements of the National Environmental Policy Act*. The memo encourages federal agencies to actively solicit the participation of state, tribal and local governments as cooperating agencies in the NEPA process. Designation as a cooperating agency does not affect the *Juniper Dunes Memorandum of Agreement* that Franklin County Board of County Commissioners approved on March 26, 2014.

Participating agencies are responsible to identify, as early as practicable, any issues of concern regarding the project's potential environmental or socioeconomic impacts that could substantially delay or prevent an agency from granting a permit or other approval that is needed for the project. We suggest that your agency's role in the development of the above project should include the following as they relate to your area of expertise:

1. Provide meaningful and early input on defining the purpose and need, determining the range of alternatives to be considered, and the methodologies and level of detail required in the alternatives analysis.
2. Participate in coordination meetings and joint field reviews as appropriate.

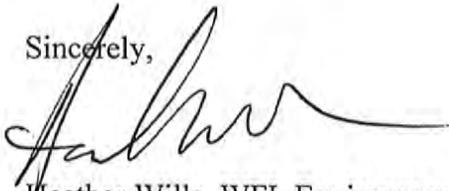
3. Timely review and comment on the pre-draft or pre-final environmental documents to reflect the views and concerns of your agency on the adequacy of the document, alternatives considered, and the anticipated impacts and mitigation.

Please respond to FHWA in writing with an acceptance or denial of the invitation prior to **within 30 days of receipt of this letter**. If your agency declines, the response should state your reason for declining the invitation.

If you have any questions or would like to discuss in more detail the project or our agencies' respective roles and responsibilities during the preparation of this Environmental Assessment, please contact Seth English-Young at 360-619-7803 or [seth.english-young@dot.gov](mailto:seth.english-young@dot.gov).

Thank you for your cooperation and interest in this project.

Sincerely,



Heather Wills, WFL Environmental Manager

Enclosures:  
Project Area Map

Cc:  
Keith Wong, WFL Project Manager  
Matt Rasmussen, Franklin County Engineer



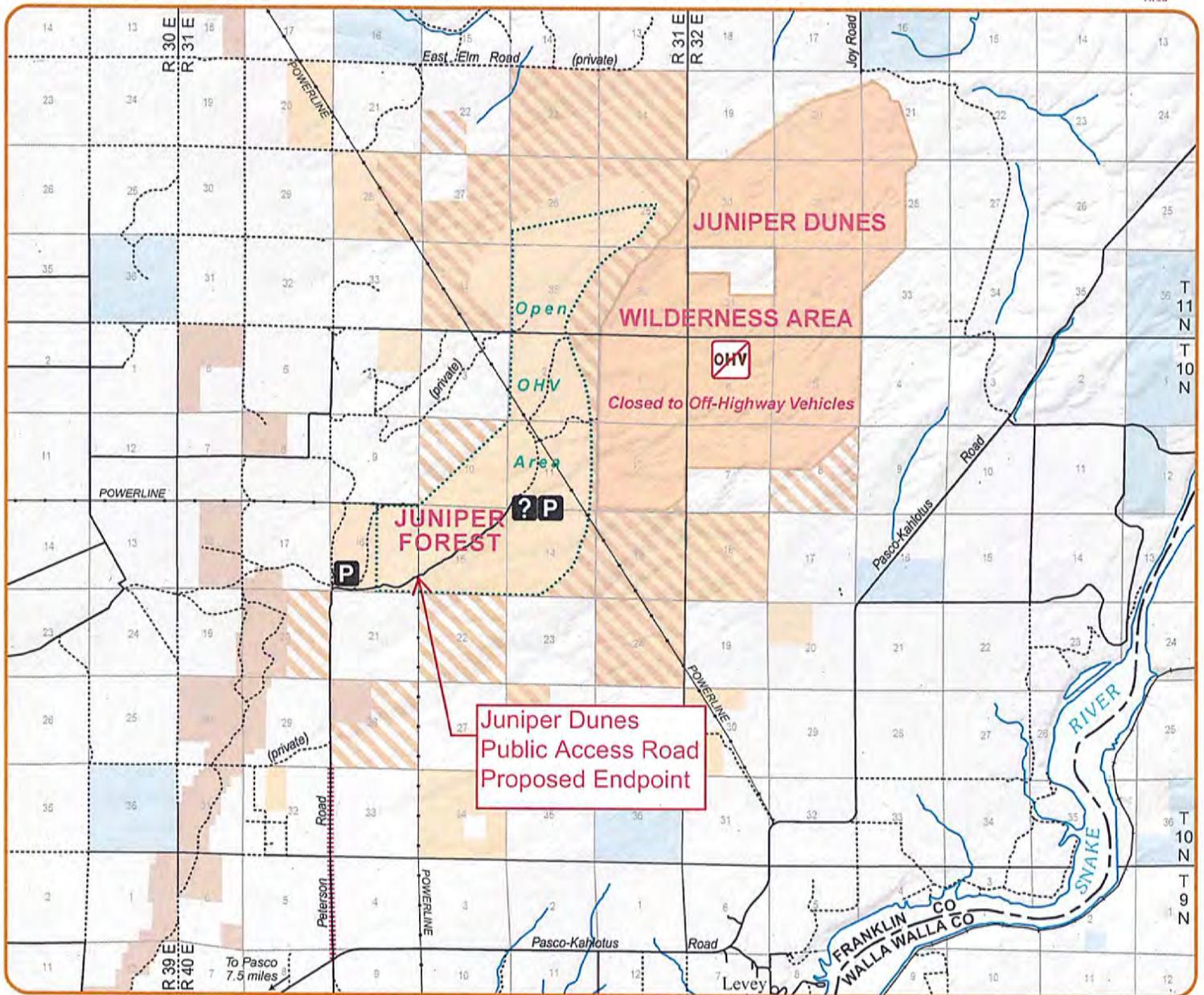
# Juniper Forest

## Recreation Opportunities



# Juniper Dunes Wilderness Area

## Recreation Opportunities



Juniper Dunes  
Public Access Road  
Proposed Endpoint

### LEGEND

#### Recreation

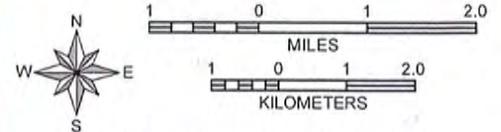
- Information
- Parking

#### Transportation

- Improved Road
- Other Road or Trail, Access as Designated
- Private Road
- Railroad

#### Administered Land

- Bureau of Land Management (BLM) (OHV use limited to designated roads and trails)
- BLM Wilderness Area (closed to OHVs)
- BLM Area of Critical Environmental Concern (OHV use limited to designated roads and trails)
- Bureau of Reclamation
- Washington Dept. of Natural Resources
- Private or Other



U. S. Department of the Interior  
Bureau of Land Management  
Spokane District  
1103 N. Fancher  
Spokane, WA 99212  
(509) 536-1200

It is unlawful to trespass on private lands. State hunting and fishing regulations apply to private lands. Landowners are not required to post or fence their lands. Check with private landowners before entering their property.



# United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
Spokane District  
Border Field Office  
1103 N. Fancher Road  
Spokane Valley, Washington 99212-1275

IN REPLY REFER TO:

2800 (ORW030)  
WAOR 68222

September 9, 2014

Ms. Heather Wills  
WFL Environmental Manager  
Federal Highway Administration  
610 E. Fifth Street  
Vancouver, WA 98661

Dear Ms. Wills:

Thank you for the invitation to become a Cooperating Agency on the Juniper Dunes public access road project. We apologize for our late response. The Bureau of Land Management does have a very big interest in this project and would like to accept your invitation to become a cooperating agency with the Federal Highway Administration. As you know, we have agreed to the anticipated responsibilities as described in the Memorandum of Agreement that we signed on March 31, 2014, and by becoming a Cooperating Agency we also agree to:

1. Provide meaningful and early input on defining the purpose and need, determining the range of alternatives to be considered, and the methodologies and level of detail required in the alternatives analysis;
2. Participate in coordination meetings and joint field reviews as appropriate; and
3. Provide timely review and comment on pre-draft or pre-final environmental documents to reflect the views and concerns of our agency on the adequacy of the document, alternatives considered, and the anticipated impacts and mitigation.

If you have any questions please contact Mark Hatchel, our realty specialist, at 509-536-1211.

Sincerely,

for Linda Clark  
Border Field Manager



# FRANKLIN COUNTY

## BOARD OF COMMISSIONERS

BRAD PECK  
DISTRICT 1

ROBERT E. KOCH  
DISTRICT 2

RICK MILLER  
DISTRICT 3

Fred H. Bowen  
County Administrator

July 23, 2014

Heather Wills, WFL Environmental Manager  
Western Federal Lands Highway Division  
610 E. Fifth Street  
Vancouver, WA 98661

Re: Invitation to Become Participating Agency and Cooperating Agency on Juniper Dunes Public Access Road, WA Franklin 2013(1)

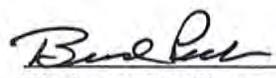
Dear Mrs. Wills,

The Franklin County Board of Commissioners received your invitation to become a participating and Cooperating Agency for the National Environmental Policy Act process surrounding the Juniper Dunes Public Access Road project. This letter will constitute the county's acceptance of your invitation. By accepting the invitation Franklin County will provide meaningful input on the purpose and need for the project, help determine the range of alternatives to be considered and provide input on alternative analysis. The county will also participate in coordination meetings and field reviews as appropriate and provide timely review on environmental documents.

The Board thanks you for the opportunity to participate in this process.

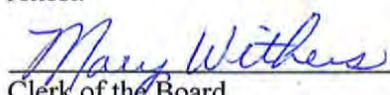
Sincerely,

  
\_\_\_\_\_  
Chairman

  
\_\_\_\_\_  
Chairman Pro Tem

  
\_\_\_\_\_  
Member

Attest:

  
\_\_\_\_\_  
Clerk of the Board





U.S. Department  
of Transportation

**Federal Highway  
Administration**

# Memorandum

Western Federal Lands Highway Division  
610 E. Fifth Street  
Vancouver, WA 98661-3801

TO: Project Files In Reply Refer to: HFL-17

FROM: Seth English-Young, WFLHD Environmental  
Specialist

DATE: October 23, 2014

SUBJECT: Juniper Dunes Access Road Reasonable Range  
of Alternatives

## **Summary**

The Western Federal Lands Highway Division (WFLHD) of the Federal Highway Administration (FHWA), in cooperation with Franklin County and the Bureau of Land Management (BLM) (project partners), is constructing a public access road to the Juniper Dunes Wilderness and off-highway vehicle (OHV) areas. FHWA is the project lead, and BLM and Franklin County are cooperating agencies.

The purpose of this memo is to describe how the reasonable range of alternatives was developed for the Juniper Dunes Access Road Environmental Assessment (EA). This memo includes the project Purpose and Need Statement; outlines the tribal, public and agency involvement; and designates the reasonable range of alternatives to be studied in the EA. It also describes the alternatives considered but dismissed by project partners with a brief explanation on why.

## **Purpose and Need Statement**

### ***Purpose:***

Provide a legal public access road to the Juniper Dunes Wilderness Area and adjacent off-highway vehicle (OHV) open area, starting at a public road and ending at a staging area in the Juniper Dunes OHV open area.

### ***Needs:***

- Users currently access the Wilderness and OHV areas by a private road (Peterson Road) that does not have an access easement.
- The owners of the road have closed Peterson Road in the past, cutting off access to the Wilderness and OHV areas to the public.
- Peterson Road is not constructed or maintained by the County, so it does not meet County standards for safety and maintenance, and has the following deficiencies:
  - Intersection with Pasco-Kahlotus Road (major rural collector) is at an acute angle which can cause an increase in crash frequency.
  - Inadequate safety clear zone on the roadway, which can cause an increase in property damage and injury accidents.
  - Substandard roadway drainage, which causes poor surface conditions.

- Poor road surface conditions, such as washboards and potholes, which can cause an increased crash frequency and increase in vehicle damage.
- Inadequate and inconsistent width, which can cause passing conflicts and increased crash frequency.
- There has been damage to private property along Peterson Road from users of the road.
- The most accessible parking area for the OHV area is outside of the OHV area and is near to private property. The location of the parking area outside of the OHV area leads to use of OHV in unauthorized areas. The proximity of the parking area to private land has caused impacts to private property.
- The lack of legal access and poor road conditions makes it difficult for law enforcement and emergency medical services to access the area. Currently, law enforcement patrols are very infrequent and emergency medical services are provided by helicopter.

In addition to the purpose and needs described above, the Bureau of Land Management (BLM) has their own need with respect to the use of BLM managed lands by Franklin County.

### ***Bureau of Land Management Purpose and Need***

#### ***BLM Purpose:***

To provide public access to meet the recreational demands in the Juniper Dunes Recreation Areas.

#### ***BLM Need:***

The BLM's need for the proposed action is to respond to a right-of-way application submitted by Franklin County under the authority of the Federal Land Policy and Management Act. It also would implement the 1987 Spokane Resource Management Plan's action to acquire public access rights to the Juniper Forest Management Area. Franklin County is applying to construct, operate and maintain a county road to the Juniper Dunes recreation area over lands administered by the BLM's Border Field office of the Spokane District.

### **Tribal, Public, and Agency Involvement**

In early 2014, Franklin County and FHWA considered many alternatives to access the Juniper Dunes Wilderness and OHV areas. An initial review of alternatives was performed by Franklin County which took into consideration cost of construction, environmental and property impacts, and whether the alternative met the purpose and need. BLM and FHWA commented and contributed on the initial list of alternatives prior to the development of the reasonable range of alternatives.

Through this process, project partners narrowed down a list of possible routes to present in the scoping process. The routes, referred to as Alternative 1a, 1b, 1c, and 2 are described below in the *Reasonable Range of Alternatives for Study in the Environmental Assessment* section of this memo. These build alternatives, together with the no-build alternative, make up the reasonable range of alternatives.

On June 20, 2014, FHWA mailed letters to the following tribes requesting government-to-government consultation (for a copy of the letters, see Appendix A):

- Confederated Tribes of the Umatilla Indian Reservation (CTUIR)
- Confederated Tribes of the Colville Reservation (CCT)
- Confederated Tribes and Bands of the Yakama Nation (CTBYN)

The CCT responded on July 9, 2014, with comments on how to define the Area of Potential Effect (see Appendix A). CTUIR and CTBYN have not replied as of the date of this memo.

On July 31, 2014, project partners held a public open house at the Trade, Recreation, Agricultural and Convention Center (TRAC center) in Pasco, Washington. The TRAC center is located about 14 miles from the beginning of the project, and is a convenient public meeting place near to the project. Pasco, along with Richland and Kennewick, make up the "Tri-Cities," a metropolitan area with a population of over 250,000 people, according to the 2010 Census. A large majority of users of the Juniper Dunes Wilderness and OHV area come from the Tri-Cities area.

Project partners advertised the public open house by distributing information through various means:

- Direct mailing. Project partners assembled a mailing list of property owners and residents within 2.5 miles of the project, public agencies with potential interest in the project, and Juniper Dunes user groups whom Franklin County had contact information (for a copy of the mailer, see Appendix B).
- Public notices in the local *Mid-Columbia* section of the Tri-City Herald, the main newspaper for the Tri-Cities. The notices ran on Sunday, July 27 and Wednesday, July 30, 2014.
- The FHWA and Franklin County websites.
- The TRAC center website and reader board. The reader board is outside the TRAC center and is visible from Interstate 182, as well as local roads.
- Fliers to businesses that cater to OHV users in the area. Franklin County contacted businesses that cater to OHV users and sent fliers for them to post advertising the meeting.

Project partners organized the meeting as an open house format with a slideshow presentation. The open house ran from 6-8pm, with a presentation at 6:15pm. Franklin County gave a PowerPoint presentation which lasted about 30 minutes, and opened the floor up for questions and comments afterward. The presentation, which was developed by project partners, described the Juniper Dunes Area and its history, including the history of access to the Juniper Dunes Wilderness and OHV areas. It described the purpose and scope of the Juniper Dunes Access project and presented potential routes. It gave an overview of the project timeline and the current stage of the project. A copy of the presentation and informational handout are included in Appendix B.

Attendees had many questions and comments. Project partners encouraged all attendees to fill out a comment card so they would have written records of comments. They also told attendees that all sections of the comment card are optional. A total of 38 comment cards were received during the meeting. As of the date of this memo, an additional 3 comments

were received after the meeting. Comments received are included in Appendix C. A summary of general comment/question themes:

- Support or opposition to the project or one or more of the proposed routes
- Concern that the project would increase impacts to surrounding land
- Comment on the timing and schedule of the project and/or access to Juniper Dunes
- Suggestions for improvements to the Juniper Dunes Wilderness and OHV areas outside of the scope of this project or comments outside of the scope of this project
- Comments and information about Smith Canyon (an area of BLM-managed land outside of the Juniper Dunes Wilderness and OHV areas, that is adjacent to all alternatives and options)

Project partners received four comment cards that suggested alternate routes not presented at the public meeting: a route entirely using BLM land, a route from Elm Road to the north of Juniper Dunes, a route from the east off Pasco-Kahlotus Road, and a suggestion to extend the road further than the designated endpoint. All three of these suggested routes have been considered but dismissed from further consideration as described in the *Alternatives Considered but Dismissed* section of this memo.

### **Reasonable Range of Alternatives for Study in the Environmental Assessment**

With input from tribes, the public, and interested agencies during the public scoping process, project partners determined the reasonable range of alternatives to be evaluated in the EA, as described below (see map in Appendix D):

- Alternative 1: an alignment along Peterson Road, starting at Pasco-Kahlotus Road. Alternative 1 has three options, all arriving at the same endpoint: Option A travels north for approximately 4.2 miles and approximately east-north-east for 1 mile; Option B travels north for approximately 3 miles, east for approximately 1 mile, and north for approximately 1.2 miles. Option C travels north for approximately 2.5 miles, then roughly follows an existing OHV pathway east-north-east for approximately 1 mile, then north for approximately 1.7 miles.
- Alternative 2: an alignment along the section line one mile to the east of Peterson Road. The alignment would travel north from Pasco-Kahlotus Road approximately 4.2 miles, arriving at the same endpoint.
- No-build alternative: this alternative would not build a new road to Juniper Dunes.

Project partners determined that the build alternatives would best meet the purpose and need of this project compared to any of the alternatives that were considered but dismissed. All options of the build alternatives provide a legal public access road to Juniper Dunes, starting at a public road and ending at the staging area, and would meet all of the project needs. Most of the dismissed alternatives would address the purpose of the project and some would address all the needs. However, dismissed alternatives that would address all of the project needs would be more expensive or difficult to build, and/or have higher environmental or right-of-way impacts than the reasonable range of build alternatives. For more information, see the *Alternatives Considered but Dismissed* section of this memo.

The no-build alternative would not address the purpose and needs of the project, but is included in the reasonable range of alternatives.

The build alternatives would address all needs of the purpose and need, as described below (needs from the purpose and needs section are in *italics*, and a description of how the alternatives meet the needs are in regular text):

- *Users currently access the Wilderness and OHV areas by a private road (Peterson Road) that does not have an access easement.* Franklin County would acquire property to own the right of way, or would obtain an easement for the build alternatives (all options).
- *The owners of the road have closed Peterson Road in the past, cutting off access to the Wilderness and OHV area to the public.* Franklin County would acquire property to own the right of way, or would obtain an easement for the build alternatives (all options), ensuring continuous public access to Juniper Dunes.
- *Peterson Road is not constructed or maintained by the County, so it does not meet County standards for safety and maintenance.* Any build alternative would be a public road, and therefore would be designed and built to County standards and would be maintained by the County.
- *There has been damage to private property along Peterson Road from users of the road.* All build alternatives would include fences where appropriate on the boundary of the right-of-way, so as to reduce potential damage to private property.
- *The most accessible parking area for the OHV area is outside of the OHV area and is near to private property. The location of the parking area outside of the OHV area leads to use of OHV in unauthorized areas. The proximity of the parking area to private land has caused impacts to private property.* The endpoint of the build alternatives is located in the OHV area, over 0.2 miles from private property.
- *The lack of legal access and poor road conditions make it difficult for law enforcement and emergency medical services to access the area. Currently, law enforcement patrols are very infrequent and emergency medical services are provided by helicopter.* Any build alternative would be a public road and would be built and maintained to County standards, therefore improving the road for access by law enforcement and emergency medical services.

All alternatives and options access a designated endpoint in the OHV area (see map in Appendix D). Project partners chose the designated endpoint to locate it in the OHV area and away from private property in order to reduce the likelihood of impacts to private property from users of Juniper Dunes. The endpoint is also located directly to the north of the starting point of Alternative 2, so Alternative 1b, 1c or Alternative 2 would not need to make any unnecessary turns. The endpoint is at the intersection of existing OHV routes and there is a flat, open area that would allow space for a parking area to be added in the future by BLM, if necessary. It is possible that either before or after FHWA selects an alternative to build, construction feasibility could cause relocation of the endpoint from the proposed location. If the endpoint is relocated, FHWA will appropriately analyze the effects of relocating the endpoint and document it to satisfy the National Environmental Policy Act.

### **Alternatives Considered but Dismissed**

If an alternative does not meet the purpose and need, it will not be advanced for further study. Additionally, some alternatives may meet the purpose and need but are more costly or difficult

to construct or may have greater environmental or property impacts than the reasonable alternatives, and will not be advanced for further study.

Theoretically, there is a very large number of starting points and ending points that could meet the purpose and need of this project. However, any potential route on private property that is not located on a section line would have considerably greater impacts to farming operations (irrigation circles) than a route that roughly follows section lines. Therefore, the project partners dismiss any route on private property that does not follow section lines.

Project partners also considered but dismissed any option that does not create a public access road for vehicle travel (e.g. shuttle bus), because they would not efficiently provide access to Juniper Dunes for users and their off-highway vehicles, and therefore would not meet the purpose and need of the project.

The following routes were considered for the project but were dismissed for the reasons described below (see map in Appendix E). Routes were analyzed based on cost of construction, utility of being constructed, and impacts to the affected lands.

1. Other options off of Peterson Road
2. Kruse Road Extension
3. Access from East Foster Wells Road
4. East Elm Road Extension
5. Murphy Road Extension
6. Joy Road
7. Falls Road
8. Routes entirely on BLM or public land
9. Route two miles east of Peterson Road
10. Other locations off of Pasco-Kahlotus Road
11. Different endpoints

*1. Other options off of Peterson Road*

There are two other options off of Peterson Road that travel along section lines:

A route that travels north on Peterson Road approximately 1 mile from Pasco-Kahlotus Road, then east for 1 mile, then north for approximately 3.2 miles. It is dismissed as an alternative for the following reason:

- a) Due to the placement of a smaller irrigation circle along the east-west section line, this route would have greater impacts to irrigation circles than the reasonable range of build alternatives with no appreciable benefit over the reasonable range of build alternatives.

A route that travels north on Peterson Road approximately 2 miles from Pasco-Kahlotus Road, then east for 1 mile, then north for approximately 2.2 miles. It is dismissed as an alternative for the following reason:

- a) The terrain is less suitable for construction than Alternative 1b, thus it would be more expensive to build than Alternative 1b with no appreciable benefit.

## 2. *Kruse Road Extension*

The Kruse Road Extension would access Juniper Dunes from the west. Kruse Road connects to Frontier Road, which connects to both Phend Road and Crestloch Road to intersect with SR-395. It is dismissed as an alternative for the following reasons:

- a) This route is substantially different from existing route – requires more than 20 miles of travel from traditional access.
- b) The route is lengthy, difficult to navigate, and confusing.
- c) Based on the difficulty to navigate and length from the existing route it is likely that some Juniper Dunes users would continue to use Peterson Road, therefore this alternative would not meet the purpose and need of the project.
- d) Users must access the route from an at grade intersection with SR-395, which causes safety concerns.
- e) The most direct route to Kruse Road from SR-395 is Phend Road, which has a narrow substandard bridge in the route. If the bridge would need to be replaced, it would increase project costs.
- f) This route would require a reconfiguration of Kruse Road at the intersection of the new route, increasing project costs.

## 3. *Access from East Foster Wells Road*

Project partners analyzed access from East Foster Wells Road, which would access Juniper Dunes from the southwest. East Foster Wells Road intersects with SR-395. They determined that two access points off of East Foster Wells, one at MP 5.74 and the other at MP 5.54, would be the most feasible and dismissed all others. The routes from MP 5.74 and MP 5.54 are dismissed as alternatives for the following reasons:

- a) Both routes have an undesirable intersection with East Foster Wells Road.
- b) Both routes run over six (6) miles in length and have high construction costs.
- c) Each route has a high impact to local residents.

## 4. *East Elm Road Extension*

The East Elm Road Extension would access Juniper Dunes from the north. The existing East Elm Road is a private road that intersects with SR-395. It is dismissed as an alternative for the following reasons:

- a) The route access is 23 miles from traditional access.
- b) Based on the difficulty to navigate and length from the existing route it is likely that some Juniper Dunes users would continue to use Peterson Road, therefore this alternative would not meet the purpose and need of the project.
- c) This route would require approximately 13 miles of construction to tie in to desired parking area.
- d) Users must access the route from an at grade intersection with SR-395, which causes safety concerns.

### 5. *Murphy Road Extension*

The Murphy Road Extension would access Juniper Dunes from the east. The Murphy Road extension would connect to Pasco-Kahlotus Road. It is dismissed as an alternative for the following reasons:

- a) The route has an undesirable location for intersection with the Pasco-Kahlotus Road.
- b) Terrain is unsuitable for construction.

### 6. *Joy Road*

Joy Road would access Juniper Dunes from the North. Joy Road connects to Blackman Ridge Road, which connects to other roads to access SR-395 and Pasco-Kahlotus Road. The existing Joy Road is close to the northeast portion of the Juniper Dunes Wilderness Area, where OHV are not allowed. It is dismissed as an alternative for the following reasons:

- a) Joy Road is remotely located.
- b) It would not have good access to OHV area.
- c) Based on the difficulty to navigate and length from the existing route it is likely that some Juniper Dunes users would continue to use Peterson Road, therefore this alternative would not meet the purpose and need of the project.
- d) This route would pass by the wilderness area and could promote use in unauthorized areas.

### 7. *Falls Road*

Falls Road would access Juniper Dunes from the west. Falls Road connects to Vineyard Drive which intersects with SR-395. It is dismissed as an alternative for the following reasons:

- a) The route is substantially different from existing route and requires more than 20 miles of travel from traditional access.
- b) Based on the difficulty to navigate and length from the existing route it is likely that some Juniper Dunes users would continue to use Peterson Road, therefore this alternative would not meet the purpose and need of the project.
- c) Users must access the route from an at grade intersection with SR-395, which causes safety concerns.
- d) The route would require crossing established wetlands on U.S. Bureau of Reclamation land.
- e) The route would require a bridge and substantial mitigation.

### 8. *Routes entirely on BLM or Public Land*

There are no possible routes from a public road to Juniper Dunes that are entirely on BLM land. A route entirely on public land, from Foster Wells Road to Juniper Dunes is possible, but it is dismissed for the following reasons:

- a) The majority of it would be on U.S. Bureau of Reclamation land.
- b) It would likely have greater impacts to wetlands and other natural resources than the reasonable range of build alternatives.
- c) The design and construction would be more challenging and expensive than the reasonable range of build alternatives.

### 9. *Route two miles east of Peterson Road*

A route two miles east of Peterson Road would access Juniper Dunes from Pasco-Kahlotus Road to the south. It is dismissed for the following reasons:

- a) Due to the placement of smaller irrigation circles along the section line, it would have greater impacts to irrigation circles than the reasonable range of build alternatives.
- b) Terrain is unsuitable for construction.
- c) The road would likely need to be longer than the reasonable range of build alternatives in order to reach a suitable endpoint.

### 10. *Other locations off of Pasco-Kahlotus Road*

Numerous other locations off of Pasco-Kahlotus Road could access Juniper Dunes. Many of them would have terrain unsuitable for construction. All options accessing off of Pasco-Kahlotus road other than those in the reasonable range of build alternatives, or described specifically in this section, are dismissed from consideration for the following reasons:

- a) They would be greater than one (1) mile away from the existing route, thus increasing the likelihood that some Juniper Dunes users would continue to use Peterson Road, therefore these alternatives would not meet the purpose and need of the project.
- b) They would require a longer road than the reasonable range of build alternatives, thus increasing the cost and impacts of the project.

### 11. *Different endpoints*

In order to meet the purpose of the project, the endpoint must be in the Juniper Dunes OHV area. The designated endpoint is the logical termini for the build alternatives because it is at the intersection of existing OHV routes and there is a flat, open area, which would allow space for a parking area to be added in the future by BLM, if necessary. Additionally, for Alternative 2, the designated endpoint would not require any unnecessary turns.

All endpoints for Alternative 1b, 1c, or 2 that are different than the designated endpoint are dismissed for one or more of the following reasons:

- a) They would require a longer road.
- b) They would require an additional turn.
- c) They would not be the logical terminus.
- d) They would increase environmental impacts.

All endpoints for Alternative 1a other than the designated endpoint are dismissed for one or more of the following reasons:

- a) They would require a longer road.
- b) They would be located closer to private property.
- c) They would not be the logical terminus.
- d) They would increase environmental impacts.

All endpoints for the alternatives other than the reasonable range of build alternatives are dismissed for the reasons described in this memo.

Appendix A  
Correspondence with Tribes



U.S. Department  
of Transportation

**Federal Highway  
Administration**

Western Federal Lands Highway Division  
610 E. Fifth Street  
Vancouver, WA 98661  
Phone 360-619-7700  
Fax 360-619-7846

June 20, 2014

The Honorable Michael Finley, Chairperson  
Confederated Tribes of the Colville Reservation  
PO Box 150  
Nespelem, WA 98155

Re: Juniper Dunes Public Access Road, WA Franklin 2013(1)

Dear Chairperson Finley,

The Federal Highway Administration, Western Federal Lands Highway Division (WFL), in partnership with the Bureau of Land Management (BLM), is seeking comments and/or participation from the Confederated Tribes of the Colville Reservation regarding the Juniper Dunes Public Access Road project (Franklin County, WA) and Environmental Assessment. The project is in the early planning phases of the National Environmental Policy Act process. The purpose of the project is to provide a legal public access road to the Juniper Dunes Wilderness Area and Juniper Forest, starting at a public road and ending at a staging area adjacent to the Juniper Forest off-highway vehicle area. The project area has not been formally defined, but the location of the proposed end point is Latitude 46 20 45 N, Longitude 118 55 51 W. The project will take place on BLM and private land.

This letter is requesting government-to-government consultation with the Confederated Tribes of the Colville Reservation. We would gladly meet with you to discuss the project at your Agency Offices. Additionally, WFL and Franklin County are holding a public open house on July 31, 2014, at the TRAC Center at 6600 Burden Blvd, in Pasco, WA if you wish to attend. You may also contact us in writing or by email—contact information is at the end of this letter. The WFL Archaeologist will be sending another letter under separate cover to your Tribal Historic Preservation Officer to initiate consultation under Section 106 of the National Historic Preservation Act of 1966.

Attached is the Purpose and Need of the project and a map showing the general project area. At this time, we have not yet defined all of the areas of potential effect within the project area; we plan to formally develop project alternatives after receiving responses to our scoping efforts.

Please review the enclosed material and contact WFL before August 4, 2014. If you have any questions, please contact me at 360-619-7710, or Heather Wills, Environmental Manager, at 360-619-7967 or [heather.wills@dot.gov](mailto:heather.wills@dot.gov).

Respectfully,



Clara Conner  
Director, Western Federal Lands Highway Division

Enclosures:  
Juniper Dunes Purpose and Need  
Project Area Map

Cc:  
John Stensgar, Confederated Tribes of the Colville Reservation-Natural Resource Committee  
Chair  
Guy Moura, Confederated Tribes of the Colville Reservation -Tribal Historic Preservation  
Officer  
Keith Wong, WFL Project Manager  
Heather Wills, WFL Environmental Manager

## Juniper Dunes Public Access Road Draft Purpose and Need

### Purpose:

Provide a legal public access road to the Juniper Dunes Wilderness Area and Juniper Forest, starting at a public road and ending at a staging area adjacent to the Juniper Forest off-highway vehicle (OHV) area.

### Needs:

- Users currently access the Wilderness and OHV area by a private road (Peterson Road) that does not have an access easement.
- The owners of the road have closed Peterson Road in the past, cutting off access to the Wilderness and OHV area to the public.
- Peterson Road is not constructed or maintained by the County, so it does not meet County standards for safety and maintenance, and has the following deficiencies:
  - Intersection with Pasco-Kahlotus Road (major rural collector) is at an acute angle which can cause an increase in crash frequency.
  - Inadequate safety clear zone on the roadway, which can cause an increase in property damage and injury accidents.
  - Substandard roadway drainage, which causes poor surface conditions.
  - Poor road surface conditions, such as washboards and potholes, which can cause an increased crash frequency and increase in vehicle damage.
  - Inadequate and inconsistent width, which can cause passing conflicts and increased crash frequency.
- There has been damage to private property along Peterson Road from users of the road.
- The most accessible parking area for the OHV area is outside of the OHV area and is near to private property. The location of the parking area outside of the OHV area leads to use of OHV in unauthorized areas. The proximity of the parking area to private land has caused impacts to private property.
- The lack of legal access and poor road conditions make it difficult for law enforcement and emergency medical services to access the area. Currently, law enforcement patrols are very infrequent and emergency medical services are provided by helicopter.



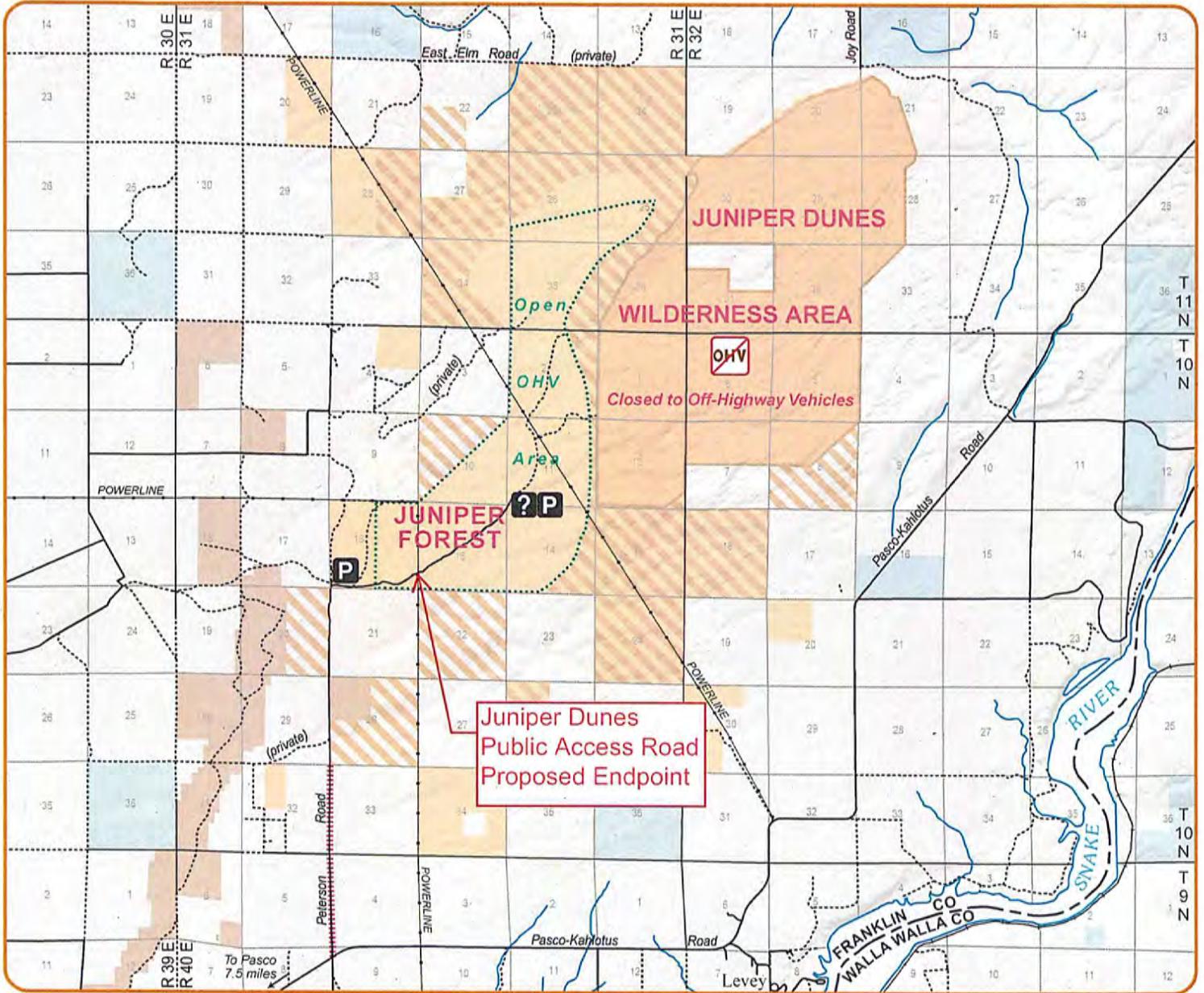
# Juniper Forest

## Recreation Opportunities



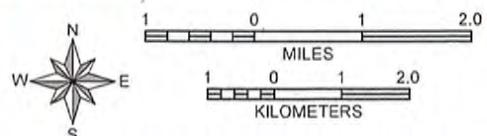
# Juniper Dunes Wilderness Area

## Recreation Opportunities



**LEGEND**

<b>Recreation</b>	<b>Administered Land</b>
Information	Bureau of Land Management (BLM) (OHV use limited to designated roads and trails)
Parking	BLM Wilderness Area (closed to OHVs)
<b>Transportation</b>	BLM Area of Critical Environmental Concern (OHV use limited to designated roads and trails)
Improved Road	Bureau of Reclamation
Other Road or Trail, Access as Designated	Washington Dept. of Natural Resources
Private Road	Private or Other
Railroad	



**U. S. Department of the Interior**  
**Bureau of Land Management**  
**Spokane District**  
**1103 N. Fancher**  
**Spokane, WA 99212**  
**(509) 536-1200**

It is unlawful to trespass on private lands. State hunting and fishing regulations apply to private lands. Landowners are not required to post or fence their lands. Check with private landowners before entering their property.



The Confederated Tribes of the Colville Reservation  
History/Archaeology Program  
P.O. Box 150, Nespelem, WA 99155

(509) 634-2693  
(509) 643-2694



July 9, 2014

HA: U14-154  
14.0191

Clara Conner, Director  
Western Federal Lands Highway Division  
610 E. Fifth St.  
Vancouver, WA. 98661

RE: Public Access to Juniper Dunes Wilderness Area and Juniper Forest

Clara Conner:

Please be advised your proposed undertaking lies within the traditional territory of the Palus Tribe. The Palus Tribe is a constituent member of and represented by the Confederated Tribes of the Colville Reservation [Colville Confederated Tribes (CCT)]. The CCT is governed by the Colville Business Council (CBC). The CBC delegated to the Tribal Historic Preservation Officer (THPO) the responsibility of representing the CCT with regard to cultural resources management issues throughout the traditional territories of our constituent tribes under Resolution 1996-29. This area includes most of eastern Washington, parts of northeastern Oregon, south central British Columbia, and parts of north central Idaho. In 1996, the CCT also entered into an agreement with the National Park Service to assume state historic preservation officer responsibilities as outlined in Section 101 (d) (2) of the National Historic Preservation Act. The assumption agreement explicitly tasks the THPO to advise and assist Federal and State agencies and local governments in carrying out their historic preservation responsibilities and for the CCT to carry out their responsibilities for review of federal undertakings in regard to cultural resources matters.

We received your letter initiating consultation regarding public access to Juniper Dunes Wilderness Area and Juniper Forest. We look forward to consulting with you on the Area of Potential Effect (APE) and reviewing the archaeological investigation for the APE. Please be aware when defining the Area of Potential Effect (APE), to take into account the auditory, visual, vibration, and olfactory indirect effects to archaeological and traditional cultural properties (TCPs). Please note that cultural resource studies must include all historic property types, traditional sites as well as archaeological sites. Your archaeologist/contractor should consult references not only to identify archaeological sites but also to identify places with Indian names, plant gathering grounds, hunting grounds and spiritually significant places.

These comments are based on information available to us at the time of the project review. We reserve the right to revise our comments as information becomes available. If you have any questions or concerns, please contact Arrow Coyote at (509) 634-2736. Thank you for your time and efforts related to this matter. If you wish to speak to me, my information is below.

Sincerely,

 (Guy Moura)  
for

Guy Moura  
Tribal Historic Preservation Officer  
(509) 634-2695 office; (509) 634-2694 FAX

cc: Dr. Whitlam DAHP  
File (AC)  
Chrono.



U.S. Department  
of Transportation

**Federal Highway  
Administration**

Western Federal Lands Highway Division  
610 E. Fifth Street  
Vancouver, WA 98661  
Phone 360-619-7700  
Fax 360-619-7846

June 20, 2014

The Honorable Les Minthorn, Chairperson  
Confederated Tribes of the Umatilla Indian Reservation  
46411 Timine Way  
Pendleton, OR 97801

Re: Juniper Dunes Public Access Road, WA Franklin 2013(1)

Dear Chairperson Minthorn,

The Federal Highway Administration, Western Federal Lands Highway Division (WFL), in partnership with the Bureau of Land Management (BLM), is seeking comments and/or participation from the Confederated Tribes of the Umatilla Indian Reservation regarding the Juniper Dunes Public Access Road project (Franklin County, WA) and Environmental Assessment. The project is in the early planning phases of the National Environmental Policy Act process. The purpose of the project is to provide a legal public access road to the Juniper Dunes Wilderness Area and Juniper Forest, starting at a public road and ending at a staging area adjacent to the Juniper Forest off-highway vehicle area. The project area has not been formally defined, but the location of the proposed end point is Latitude 46 20 45 N, Longitude 118 55 51 W. The project will take place on BLM and private land.

This letter is requesting government-to-government consultation with the Confederated Tribes of the Umatilla Indian Reservation. We would gladly meet with you to discuss the project at your Agency Offices. Additionally, WFL and Franklin County are holding a public open house on July 31, 2014, at the TRAC Center at 6600 Burden Blvd, in Pasco, WA if you wish to attend. You may also contact us in writing or by email—contact information is at the end of this letter. The WFL Archaeologist will be sending another letter under separate cover to your Tribal Historic Preservation Officer to initiate consultation under Section 106 of the National Historic Preservation Act of 1966.

Attached is the Purpose and Need of the project and a map showing the general project area. At this time, we have not yet defined all of the areas of potential effect within the project area; we plan to formally develop project alternatives after receiving responses to our scoping efforts.

Please review the enclosed material and contact WFL before August 4, 2014. If you have any questions, please contact me at 360-619-7710, or Heather Wills, Environmental Manager, at 360-619-7967 or [heather.wills@dot.gov](mailto:heather.wills@dot.gov).

Respectfully,



Clara Conner  
Director, Western Federal Lands Highway Division

Enclosures:

Juniper Dunes Purpose and Need  
Project Area Map

Cc:

Eric Quaempts, Confederated Tribes of the Umatilla Indian Reservation-Natural Resources  
Director  
Carey Miller, Confederated Tribes of the Umatilla Indian Reservation -Tribal Historic  
Preservation Officer  
Keith Wong, WFL Project Manager  
Heather Wills, WFL Environmental Manager



U.S. Department  
of Transportation

**Federal Highway  
Administration**

Western Federal Lands Highway Division  
610 E. Fifth Street  
Vancouver, WA 98661  
Phone 360-619-7700  
Fax 360-619-7846

June 20, 2014

The Honorable JoDe L. Goudy, Chairperson  
Confederated Tribes and Bands of the Yakama Nation  
401 Fort Road, PO Box 151  
Toppenish, WA 98948

Re: Juniper Dunes Public Access Road, WA Franklin 2013(1)

Dear Chairperson Goudy,

The Federal Highway Administration, Western Federal Lands Highway Division (WFL), in partnership with the Bureau of Land Management (BLM), is seeking comments and/or participation from the Confederated Tribes and Bands of the Yakama Nation regarding the Juniper Dunes Public Access Road project (Franklin County, WA) and Environmental Assessment. The project is in the early planning phases of the National Environmental Policy Act process. The purpose of the project is to provide a legal public access road to the Juniper Dunes Wilderness Area and Juniper Forest, starting at a public road and ending at a staging area adjacent to the Juniper Forest off-highway vehicle area. The project area has not been formally defined, but the location of the proposed end point is Latitude 46 20 45 N, Longitude 118 55 51 W. The project will take place on BLM and private land.

This letter is requesting government-to-government consultation with the Confederated Tribes and Bands of the Yakama Nation. We would gladly meet with you to discuss the project at your Main Agency Offices. Additionally, WFL and Franklin County are holding a public open house on July 31, 2014, at the TRAC Center at 6600 Burden Blvd, in Pasco, WA if you wish to attend. You may also contact us in writing or by email—contact information is at the end of this letter. The WFL Archaeologist will be sending another letter under separate cover to your Tribal Historic Preservation Officer to initiate consultation under Section 106 of the National Historic Preservation Act of 1966.

Attached is the Purpose and Need of the project and a map showing the general project area. At this time, we have not yet defined all of the areas of potential effect within the project area; we plan to formally develop project alternatives after receiving responses to our scoping efforts.

Please review the enclosed material and contact WFL before August 4, 2014. If you have any questions, please contact me at 360-619-7710, or Heather Wills, Environmental Manager, at 360-619-7967 or [heather.wills@dot.gov](mailto:heather.wills@dot.gov).

Respectfully,



Clara Conner  
Director, Western Federal Lands Highway Division

Enclosures:

Juniper Dunes Purpose and Need  
Project Area Map

Cc:

Johnson Meninick, Confederated Tribes and Bands of the Yakama Nation-Cultural Resources  
Program Manager

Kate Valdez, Confederated Tribes and Bands of the Yakama Nation-Tribal Historic Preservation  
Officer

Elizabeth Sanchey, Confederated Tribes and Bands of the Yakama Nation-Environmental  
Review Coordinator

Keith Wong, WFL Project Manager

Heather Wills, WFL Environmental Manager

Appendix B  
Public Involvement Materials

The Western Federal Lands Division of the Federal Highway Administration, in partnership with the Bureau of Land Management and Franklin County, is planning to construct a public access to the Juniper Dunes Wilderness and off-highway vehicle areas. The project is currently in the early planning stages.

You are invited to attend a public Open House on Thursday, July 31, 2014 to learn more about the goals of the project, and to provide your feedback to the project team. The meeting will be held at the TRAC Center, 6600 Burden Blvd, Pasco from 6-8PM, with a presentation at 7PM.

For more information contact Seth English-Young, Environmental Specialist at FHWA at [seth.english-young@dot.gov](mailto:seth.english-young@dot.gov) or (360) 619-7803.



## JUNIPER DUNES AREA ACCESS ROAD

### *Open House*

**Thursday, July 31, 2014 • 6:00 pm to 8:00 pm • TRAC Center**

<http://www.wfl.fhwa.dot.gov/projects/wa/juniper-dunes/>

**Seth English-Young**  
Western Federal Land Highway Division  
360-619-7803  
seth.english-young@dot.gov

**Matt Rasmussen**  
Franklin County Public Works  
509-545-3514  
mrasmussen@co.franklin.wa.us

- *19,600-acre wilderness area in Franklin County*
- *Over 8,600 acres of off-road area*
- *Currently not served by county road*

### **Background:**

- Wilderness area, including recreation area, developed from the 1960s through the late 1980s
- The early and middle 2000s were marked by numerous access closures by adjacent property owners on whose land access routes lie
- 2011 – Franklin County received Bureau of Land Management (BLM) grant for access road
- 2013 – Franklin County received Federal Highway Administration (FHWA) grant for access road
- 2014 – Franklin County, BLM, and FHWA's Western Federal Lands Highway Division joined to complete the access road project

### **Scope and Purpose:**

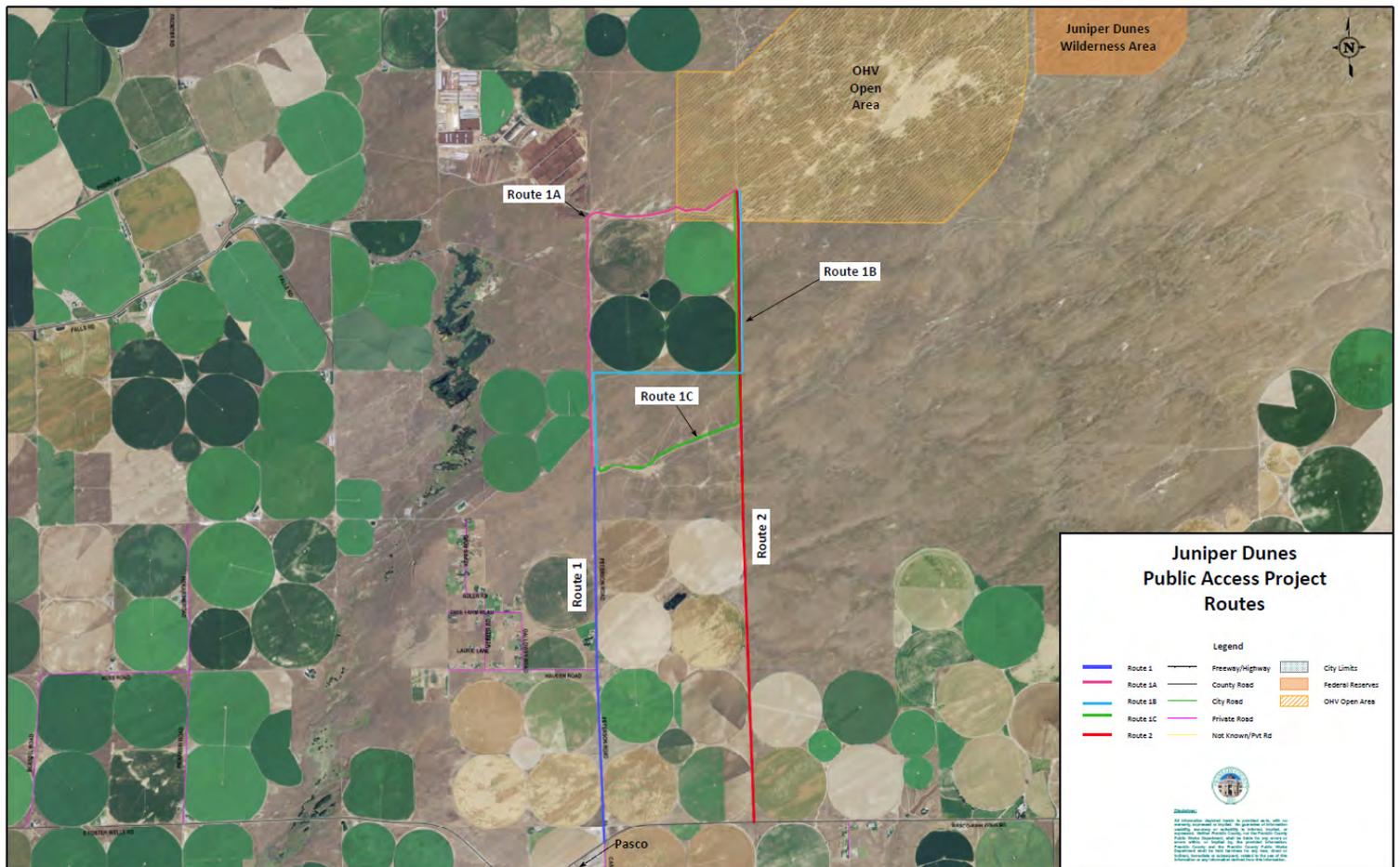
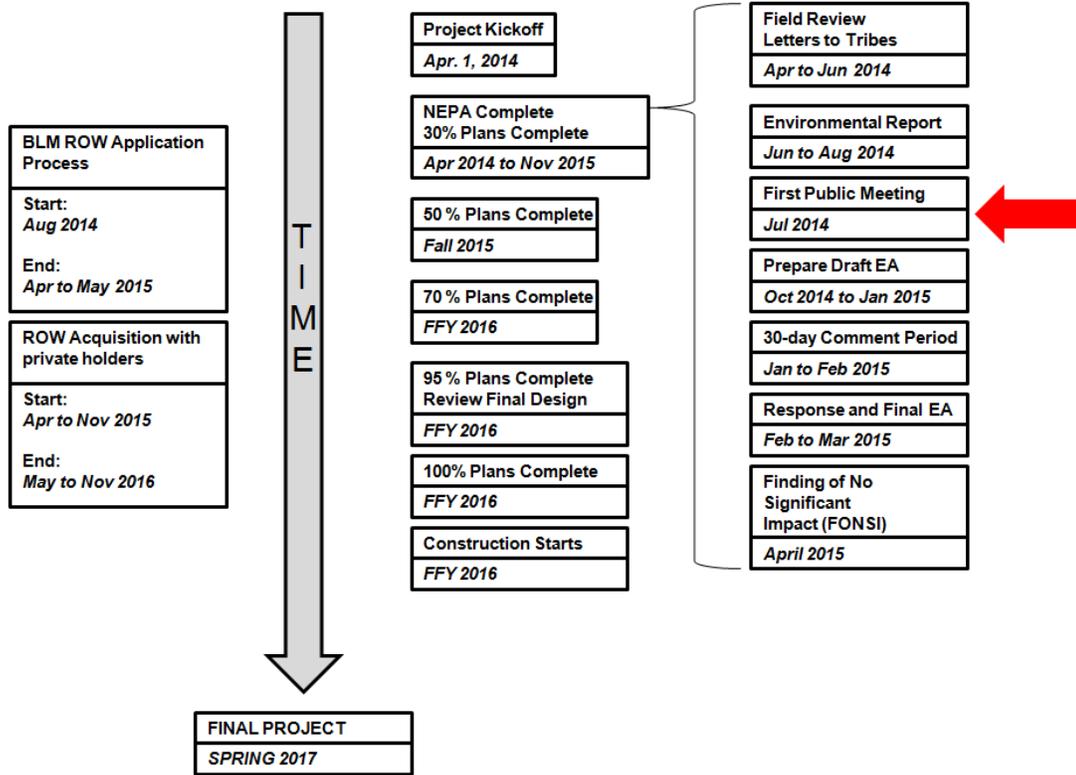
- The project will develop a new access road to the Juniper Dunes Area (proposed specs follow):
  - Length: approximately 4.2 to 4.92 miles
  - Width: two (2) 11-foot lanes with two-foot shoulders (26 feet total)
  - Composition: first mile: asphalt over rock base  
remainder: bituminous surface treatment ("chip seal")
  - Speed: 35 MPH
- Project administration and construction to comply with USDOT requirements
- Estimated cost: \$1,800,000 to \$2,250,000

### **Current Status:**

- Project is currently in the environmental review phase, which is required by federal law (National Environmental Policy Act) and reviews the project's potential to impact biological, cultural, historical, and population resources
- Please see proposed time line on the back of this hand out



# Juniper Dunes Access Road – Planned Timeline

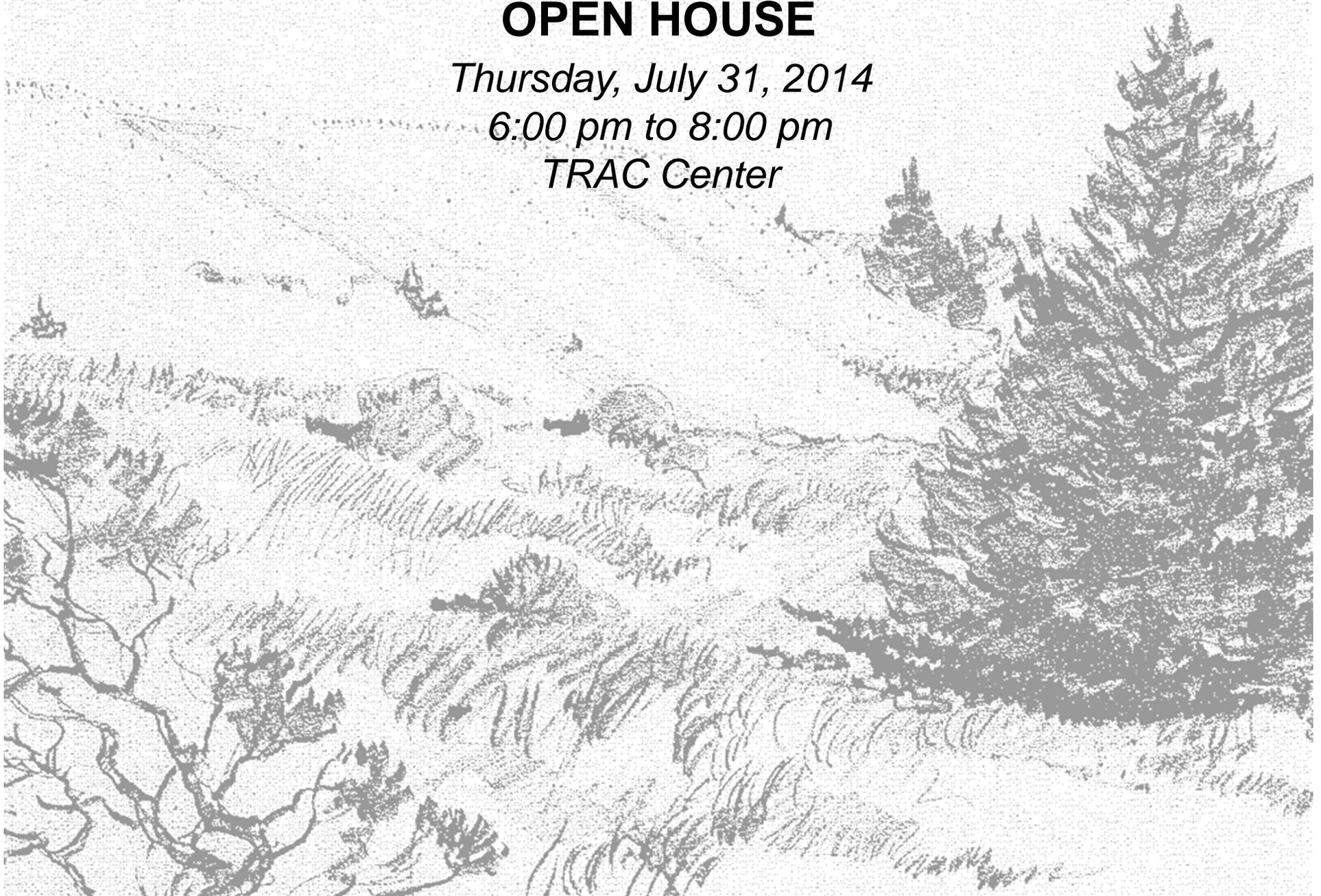


# **JUNIPER DUNES RECREATION AREA ACCESS ROAD OPEN HOUSE**

*Thursday, July 31, 2014*

*6:00 pm to 8:00 pm*

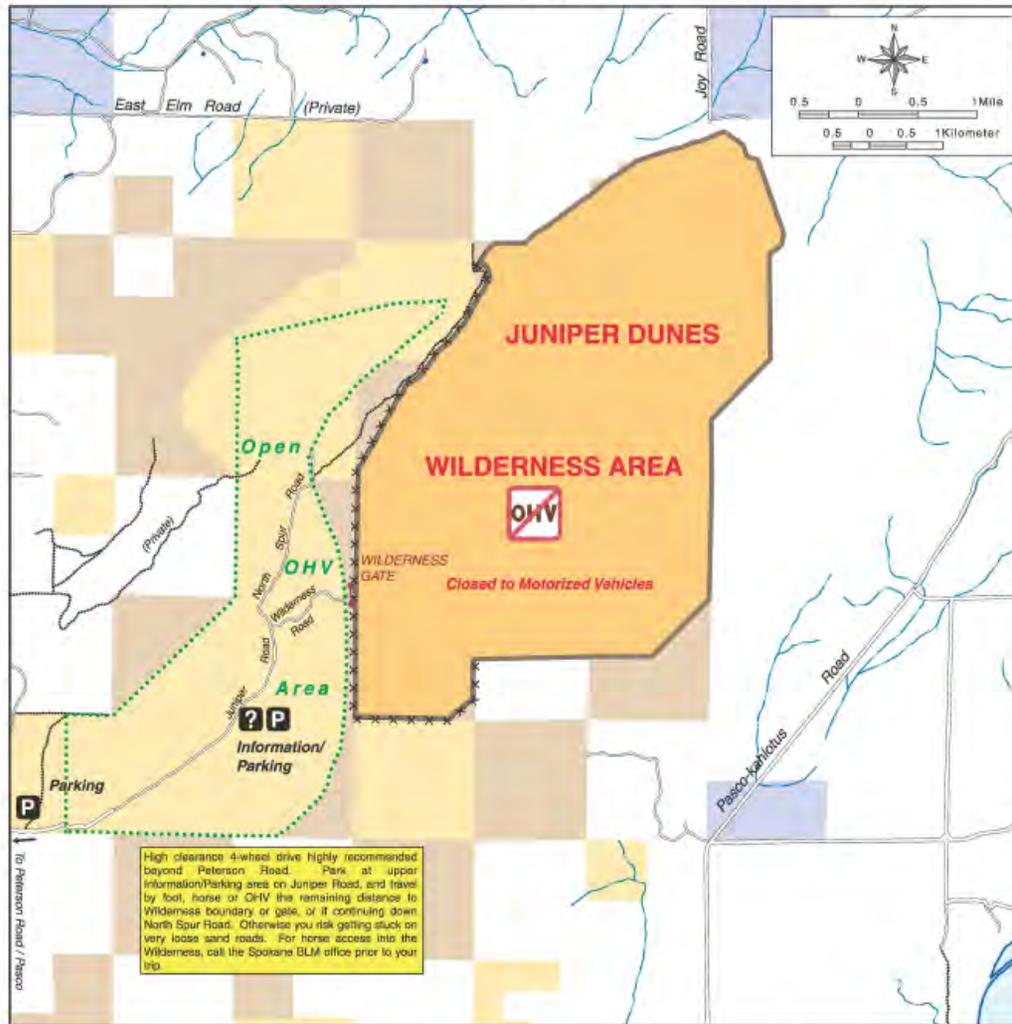
*TRAC Center*



# What is the Juniper Dunes Area?

- Located in southeastern Franklin County (north and west of Pasco-Kahlotus Road)
- Total area: 19,600 acres
- Used for hiking, off-highway vehicles, biking, horseback riding, camping, hunting (within designated areas)
- Consists of three areas:
  - Juniper Dunes Wilderness: 7,100 acres of wilderness area; fenced; no motorized or mechanized uses (including bikes) are permitted
  - OHV "Open" Area: 3,920 acres of off-highway vehicle (OHV)-permissible area
  - ACEC: 8,620 acres of Area of Critical Environmental Concern; OHV use is only permitted on designated trails in this area
- Juniper Dunes Area is not serviced by a public access road, so access is currently at the discretion of surrounding private land owners

# JUNIPER DUNES WILDERNESS



High clearance 4-wheel drive highly recommended beyond Peterson Road. Park at upper information/parking area on Juniper Road, and travel by foot, horse or OHV the remaining distance to Wilderness boundary or gate, or if continuing down North Spur Road. Otherwise you risk getting stuck on very loose sand roads. For horse access into the Wilderness, call the Spokane BLM office prior to your trip.

- LEGEND**
- Trail
  - Improved Road
  - Other Road or Trail, Access as Designated
  - x-x- Fence
- Administered Land**
- Bureau of Land Management (BLM)  
*(OHV use limited to designated roads and trails)*
  - BLM Wilderness Area *(closed to Motorized Vehicles)*
  - BLM Area of Critical Environmental Concern  
*(OHV use limited to designated roads and trails)*
  - Washington Dept. of Natural Resources
  - Private or Other

Surface management and land ownership is subject to ongoing change. Contact the BLM Prineville District office for further information.



No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual or aggregate use with other data. Original data were compiled from various sources. This information may not meet National Map Accuracy Standards. This product was developed through digital means and may be updated without notification.

# History of the Juniper Dunes

- The Juniper Forest Management Area has been utilized by residents of the Tri-City metro area since the 1960s.
- In 1971, the Bureau of Land Management (BLM) began program of acquiring associated lands, resulting in 4,500 acre management area.
- In 1981, Washington State Wilderness Act increased wilderness area by 1,800 acres.
- In 1987, BLM completed the Wilderness Management Plan for Juniper Dunes Wilderness.
- Between 2001 and 2007, several closures of access to privately-owned land initiated the process of trying to build a public access. While this ran through various avenues (direct negotiations between BLM and landowners, proposed federal legislation, *etc.*), a comprehensive outcome did not occur.

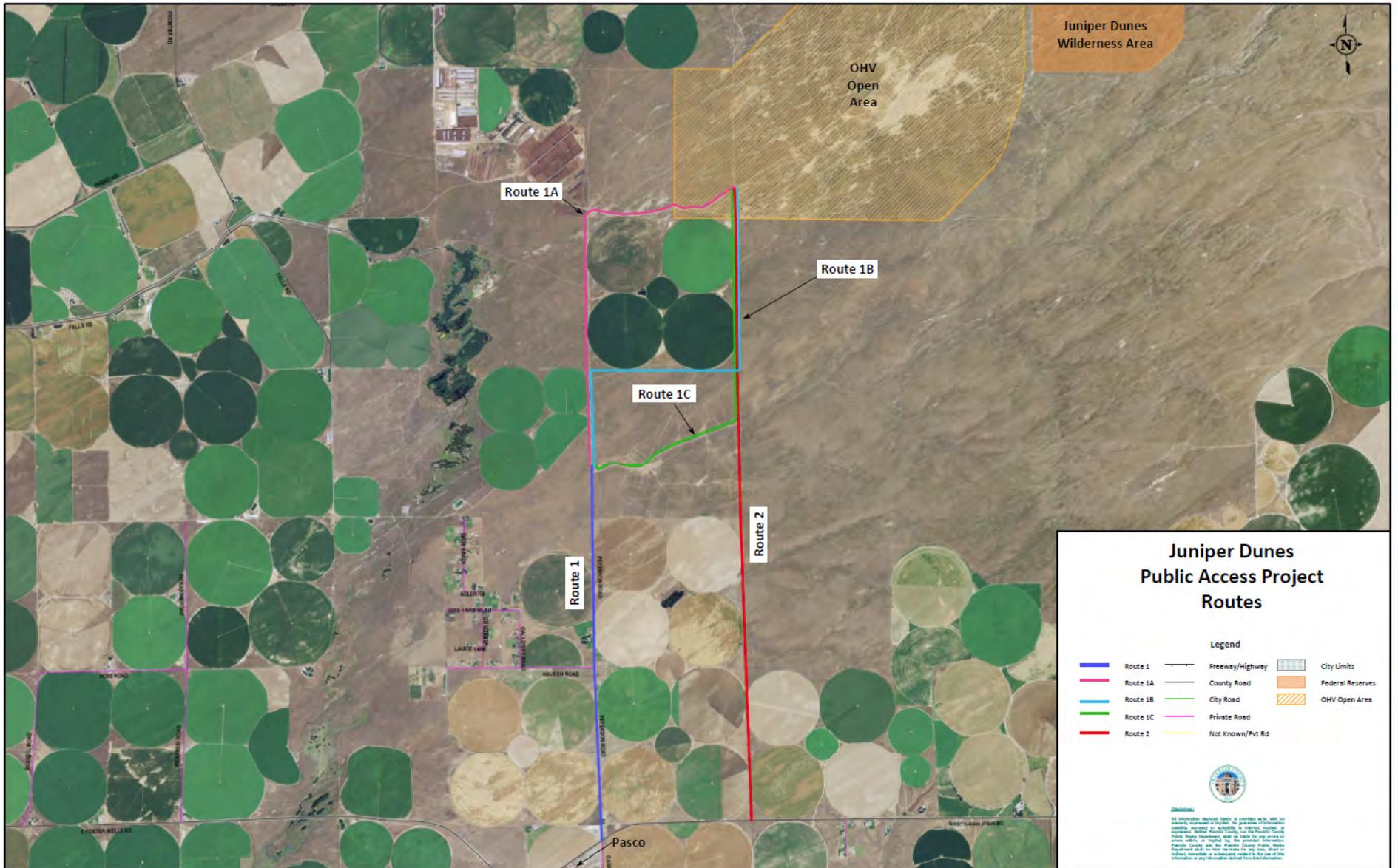
## History of the Juniper Dunes (continued)

- In 2011, Franklin County received a grant from BLM for \$716,500 to complete the first phase of a public access road to the Juniper Dunes area. However, mitigation for concerns regarding existing irrigation water lines risked exceeding available funds.
- In June 2013, Franklin County was awarded a Federal Land Access Program grant, administered through the Federal Highway Administration's Western Federal Lands Highway Division (WFLHD). This provided funding for an access road.
- In August 2013, Franklin County committed to its portion of the funding match.
- In April 2014, Franklin County executed a memorandum of agreement with WFLHD and BLM to work together on the project.

# Juniper Dunes Access Road - Purpose and Scope

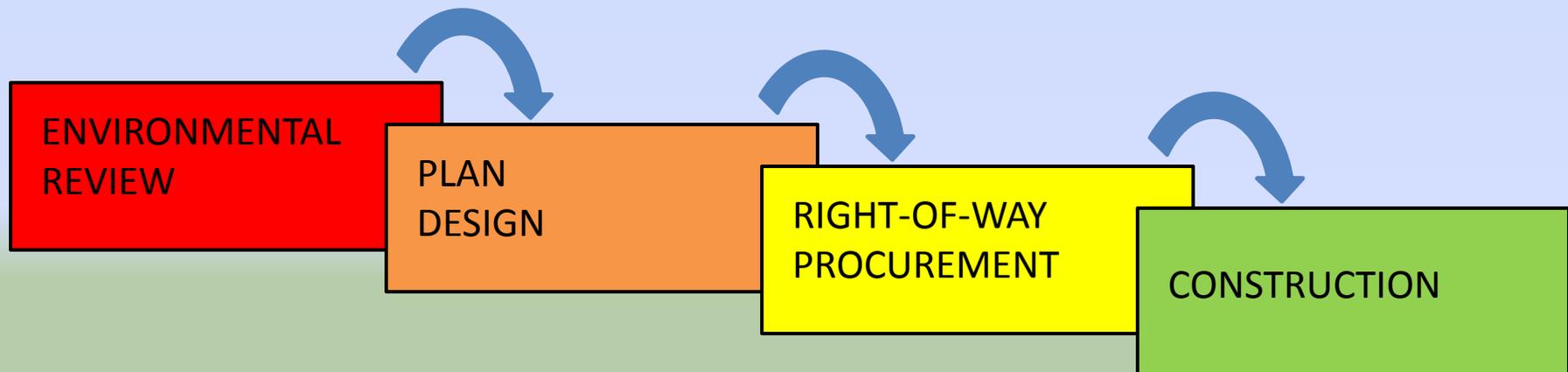
- Provide a legal public access road to the Juniper Dunes Wilderness Area and the adjacent off-highway vehicle (OHV) open area, starting at a public road and ending at a staging area adjacent to the Juniper Dunes open area.
- The project aims to address the following issues:
  - No public access (all access currently traverses private property)
  - Public access has been legally restricted in the past (by property owners)
  - Bring public access to the area to County road standards: drainage, sight distance, road conditions, consistent and necessary road width
  - Prevent or reduce opportunities for vandalism and disturbance of surrounding properties
  - Provide better access for emergency responders
- The BLM's need for the proposed action will be to respond to a right-of-way application submitted by Franklin County and to implement the 1987 BLM Resource Management Plan's action to acquire public access rights to the Juniper Dunes area.

# Juniper Dunes Access Road – Current Stage

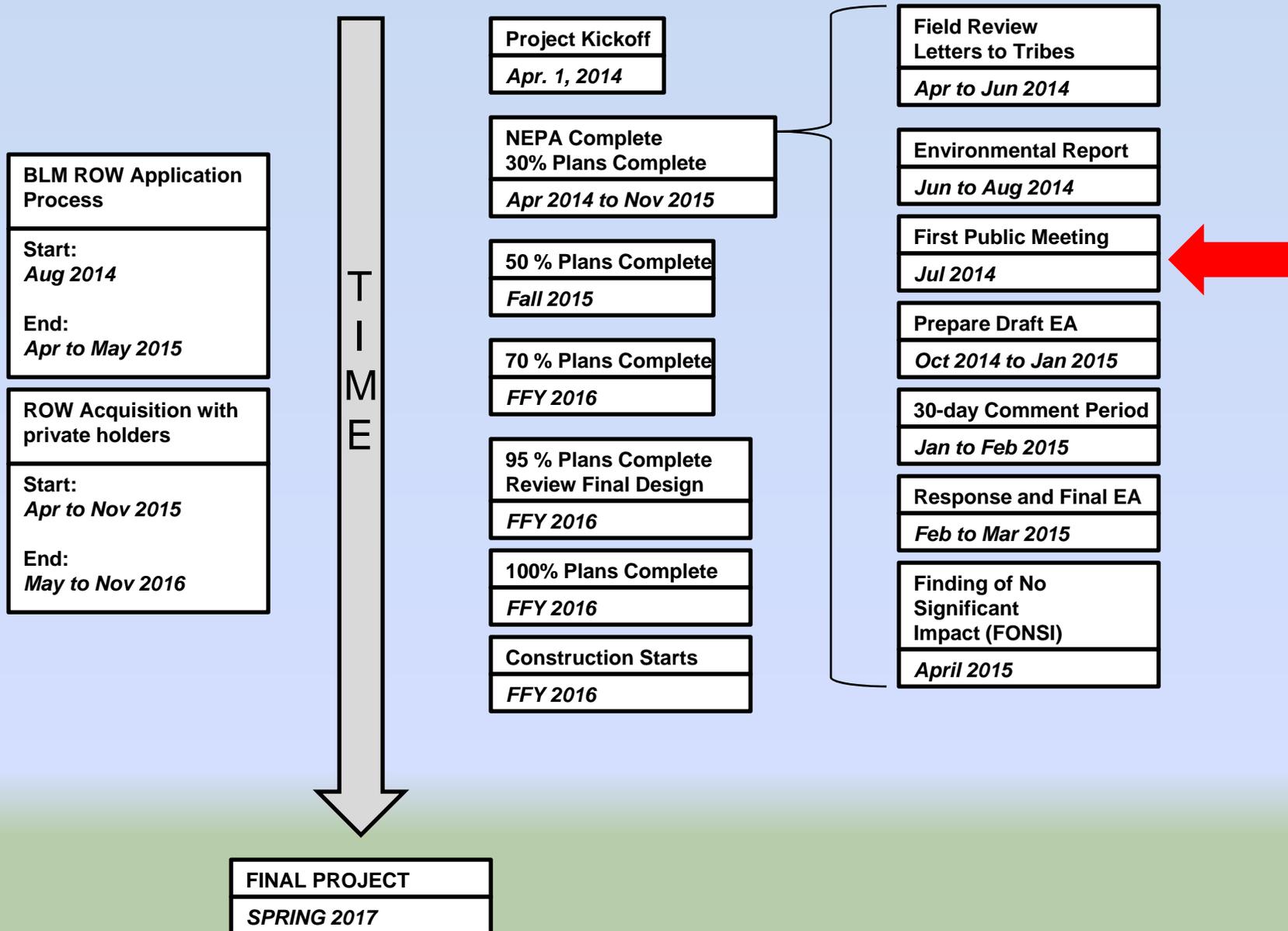


# Juniper Dunes Access Road – Current Stage

- Currently in the environmental review stage:
  - National Environmental Policy Act (NEPA) requires consideration of biological, cultural, historical, population impacts.
  - Requires resource assessment surveys, consultation with local tribes, community input (such as this meeting).
  - All technically viable alternatives must be considered.
- Once the environmental review stage is completed, construction plans can be finalized.
- After plans are completed, right-of-way can be purchased from landowners.
- Then, CONSTRUCTION!



# Juniper Dunes Access Road – Planned Timeline



# QUESTIONS?



Appendix C  
Public Comments

JUNIPER DUNES ACCESS ROAD OPEN HOUSE  
PUBLIC QUESTIONNAIRE

1. What is your relationship to the Juniper Dunes Area? (Mark all that apply)

- Visitor     Adjacent property owner/resident     Franklin County resident  
 Other: \_\_\_\_\_

2. On average, how many times a year do you visit the Juniper Dunes Area?

- 0     1-2     3-5     6-12     More than 12

60+ days  
yr

3. What type of activities do you do when visiting the Juniper Dunes Area?  
(Mark all that apply.)

- Hiking     Cycling     Off-roading     Hunting     Camping  
 Other: \_\_\_\_\_

4. Which route presented do you prefer?

- 1  Route 1A     Route 1B     Route 1C     Route 2     I prefer none of these.

5. Do you support this project to provide an access road to the Juniper Dunes Area?

- Yes     No     I support an access road, but not through this project.

Time will  
tell

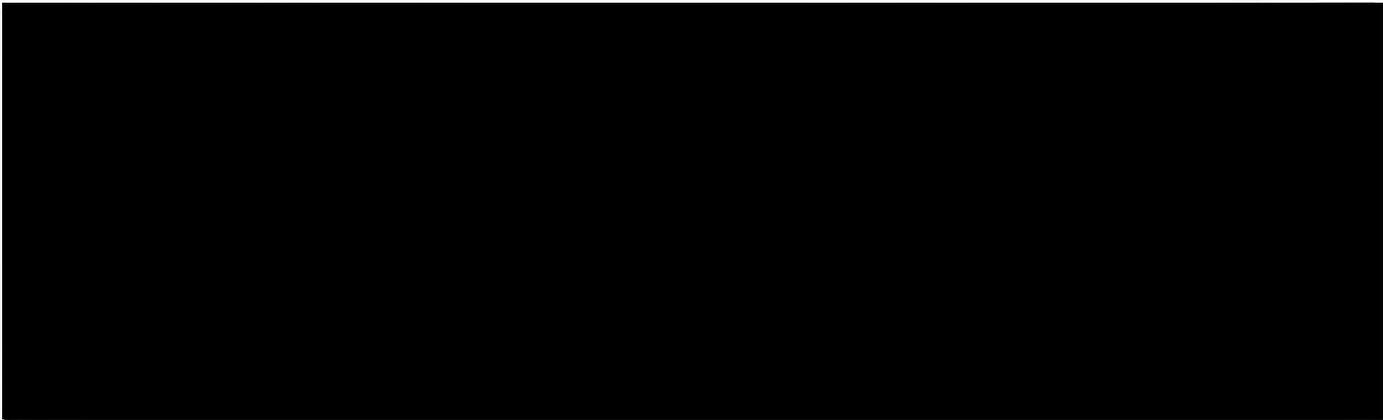
6. Are there any access problems that you feel this project does not address?

No Route 1C Smith Canyon road - further development of this route will be detrimental to use of this area. The only riding area for younger riders.

GENERAL COMMENTS

FAMILY RECREATION, OHV RIDING, IS THE PRIMARY USE FOR SMITH CANYON AREA. Building a road through will detract from the already limited area.

\* Route 1B IS THE ROUTE FROM SMITH CANYON TO THE OHV OPEN AREA. OFF ROAD VEHICLE ROUTE.



**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

1. What is your relationship to the Juniper Dunes Area? *(Mark all that apply)*  
 Visitor     Adjacent property owner/resident     Franklin County resident  
 Other: \_\_\_\_\_
2. On average, how many times a year do you visit the Juniper Dunes Area?  
 0     1-2     3-5     6-12     More than 12
3. What type of activities do you do when visiting the Juniper Dunes Area?  
*(Mark all that apply.)*  
 Hiking     Cycling     Off-roading     Hunting     Camping  
 Other: \_\_\_\_\_
4. Which route presented do you prefer?  
 Route 1A     Route 1B     Route 1C     Route 2     I prefer none of these.
5. Do you support this project to provide an access road to the Juniper Dunes Area?  
 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**GENERAL COMMENTS**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Contact Information - OPTIONAL**

Name: \_\_\_\_\_  
Street address: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ ZIP: \_\_\_\_\_  
Telephone number: \_\_\_\_\_  
Email: \_\_\_\_\_

**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

1. What is your relationship to the Juniper Dunes Area? *(Mark all that apply)*  
 Visitor     Adjacent property owner/resident     Franklin County resident  
 Other: \_\_\_\_\_
2. On average, how many times a year do you visit the Juniper Dunes Area?  
 0     1-2     3-5     6-12     More than 12
3. What type of activities do you do when visiting the Juniper Dunes Area?  
*(Mark all that apply.)*  
 Hiking     Cycling     Off-roading     Hunting     Camping  
 Other: 4x4 AND ATV
4. Which route presented do you prefer?  
 Route 1A     Route 1B     Route 1C     Route 2     I prefer none of these.
5. Do you support this project to provide an access road to the Juniper Dunes Area?  
 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

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**GENERAL COMMENTS**

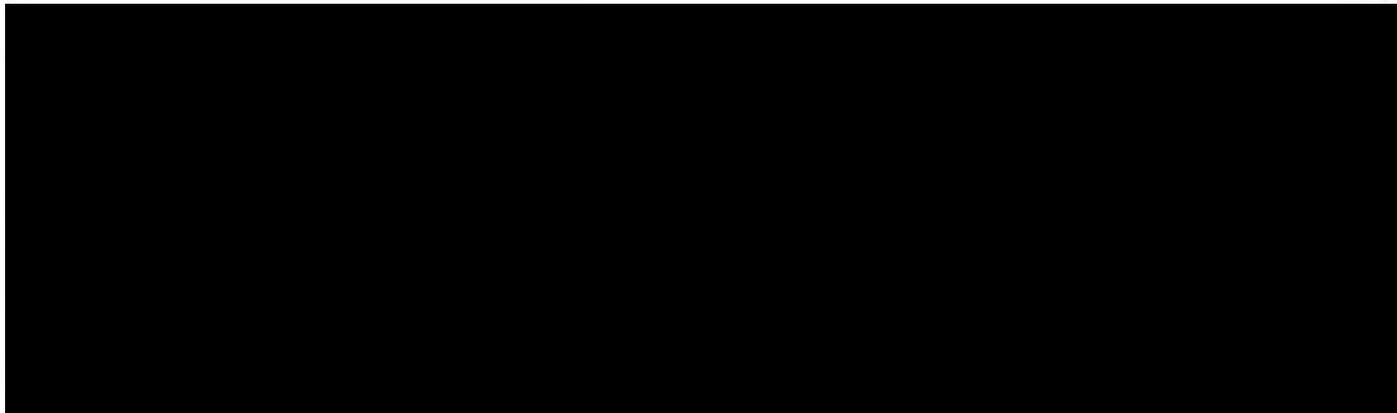
I LIKE THE IDEA OF KEEPING THE JUNIPER DUNES TRAFFIC  
SEPARATED FROM THE AG/HAZARD TRAFFIC. ROUTE 7 WOULD  
MINIMIZE THE CONFLICTS. WOULD NEED TO ENSURE ACCESS  
TO/FROM SALT CANYON AREA IS MAINTAINED.

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**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

1. What is your relationship to the Juniper Dunes Area? (Mark all that apply)
- Visitor     Adjacent property owner/resident     Franklin County resident  
 Other: \_\_\_\_\_

2. On average, how many times a year do you visit the Juniper Dunes Area?
- 0     1-2     3-5     6-12     More than 12

3. What type of activities do you do when visiting the Juniper Dunes Area?  
(Mark all that apply.)
- NA  Hiking     Cycling     Off-roading     Hunting     Camping  
 Other: \_\_\_\_\_

4. Which route presented do you prefer?
- Route 1A     Route 1B     Route 1C     Route 2     I prefer none of these.

5. Do you support this project to provide an access road to the Juniper Dunes Area?
- Yes     No     I support an access road, but not through this project.

6. Are there any access problems that you feel this project does not address?

*If Route 2 is selected, how will access via Petersen Road be controlled to eliminate unauthorized access by non-residents?*

**GENERAL COMMENTS**

- *What were the results of the vehicle count recently done on Petersen Road?*
- *Need to somehow immediately provide portable toilets, trash cans, fire circles, etc., for public health and fire control*
- *If Route 1 is chosen, farmers use Petersen Road to access their fields. It wouldn't be right to put up fences and eliminate their access.*

**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

1. What is your relationship to the Juniper Dunes Area? *(Mark all that apply)*  
 Visitor     Adjacent property owner/resident     Franklin County resident  
 Other: \_\_\_\_\_
2. On average, how many times a year do you visit the Juniper Dunes Area?  
 0     1-2     3-5     6-12     More than 12
3. What type of activities do you do when visiting the Juniper Dunes Area?  
*(Mark all that apply.)*  
 Hiking     Cycling     Off-roading     Hunting     Camping  
 Other: Horse back Riding
4. Which route presented do you prefer?  
 Route 1A     Route 1B     Route 1C     Route 2     I prefer none of these.
5. Do you support this project to provide an access road to the Juniper Dunes Area?  
 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

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**GENERAL COMMENTS**

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Living on Kepps Rd, I would prefer Route 2 to keep the traffic  
off of Peterson Rd.

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**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

1. What is your relationship to the Juniper Dunes Area? *(Mark all that apply)*  
 Visitor     Adjacent property owner/resident     Franklin County resident  
 Other: \_\_\_\_\_
2. On average, how many times a year do you visit the Juniper Dunes Area?  
 0         1-2         3-5         6-12         More than 12
3. What type of activities do you do when visiting the Juniper Dunes Area?  
*(Mark all that apply.)*  
 Hiking     Cycling     Off-roading     Hunting     Camping  
 Other: \_\_\_\_\_
4. Which route presented do you prefer?  
 Route 1A     Route 1B     Route 1C     Route 2     I prefer none of these.
5. Do you support this project to provide an access road to the Juniper Dunes Area?  
 Yes         No         I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

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**GENERAL COMMENTS**

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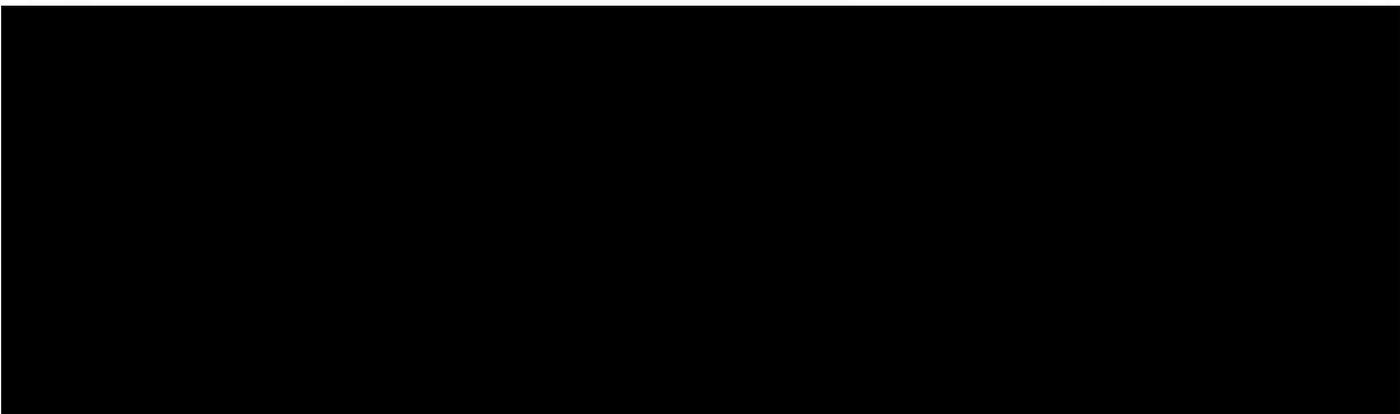
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JUNIPER DUNES ACCESS ROAD OPEN HOUSE  
PUBLIC QUESTIONNAIRE

1. What is your relationship to the Juniper Dunes Area? *(Mark all that apply)*  
 Visitor     Adjacent property owner/resident     Franklin County resident  
 Other: \_\_\_\_\_
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*(Mark all that apply.)*  
 Hiking     Cycling     Off-roading     Hunting     Camping  
 Other: N/A
4. Which route presented do you prefer?  
 Route 1A     Route 1B     Route 1C     Route 2     I prefer none of these.
5. Do you support this project to provide an access road to the Juniper Dunes Area?  
 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

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GENERAL COMMENTS

*If route 2 is selected, signage needs to be placed at Petersen Road stating "No access to Juniper Dunes"*

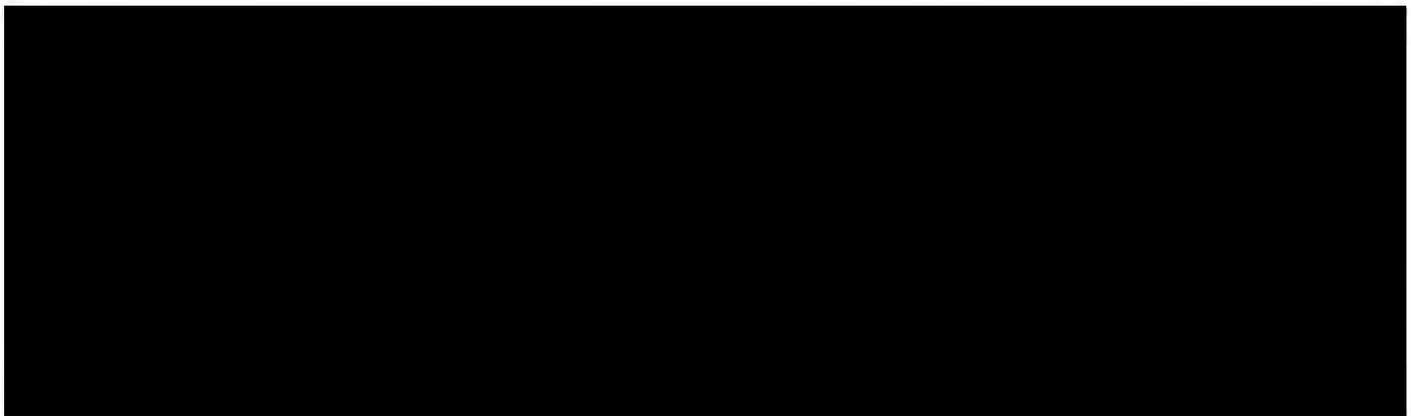
*The three cross over points from Petersen Road could need to be blocked also.*

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**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

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 Visitor     Adjacent property owner/resident     Franklin County resident  
 Other: Kannewick Resident
2. On average, how many times a year do you visit the Juniper Dunes Area?  
 0     1-2     3-5     6-12     More than 12
3. What type of activities do you do when visiting the Juniper Dunes Area?  
*(Mark all that apply.)*  
 Hiking     Cycling     Off-roading     Hunting     Camping  
 Other: \_\_\_\_\_
4. Which route presented do you prefer?  
 Route 1A     Route 1B     Route 1C     Route 2     I prefer none of these.
5. Do you support this project to provide an access road to the Juniper Dunes Area?  
 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

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**GENERAL COMMENTS**

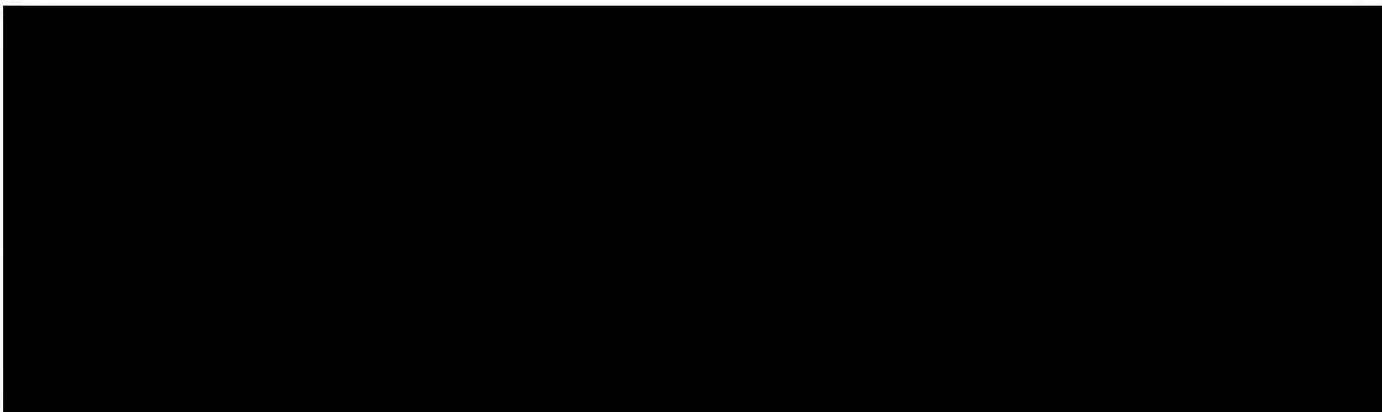
*Make it a priority and get it done.  
this problem has been dragging on for  
for too long.*

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**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

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*(Mark all that apply.)*  
 Hiking     Cycling     Off-roading     Hunting     Camping  
 Other: \_\_\_\_\_
4. Which route presented do you prefer?  
 Route 1A     Route 1B     Route 1C     Route 2     I prefer none of these.
5. Do you support this project to provide an access road to the Juniper Dunes Area?  
 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

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**GENERAL COMMENTS**

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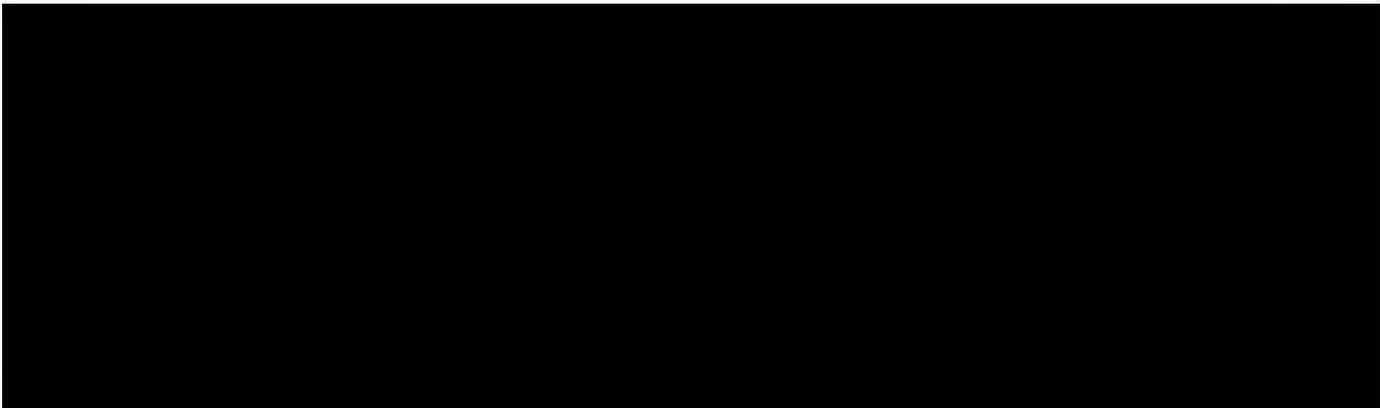
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**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

1. What is your relationship to the Juniper Dunes Area? *(Mark all that apply)*  
 Visitor     Adjacent property owner/resident     Franklin County resident  
 Other: \_\_\_\_\_
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3. What type of activities do you do when visiting the Juniper Dunes Area?  
*(Mark all that apply.)*  
 Hiking     Cycling     Off-roading     Hunting     Camping  
 Other: \_\_\_\_\_
4. Which route presented do you prefer?  
 Route 1A     Route 1B     Route 1C     Route 2     I prefer none of these.
5. Do you support this project to provide an access road to the Juniper Dunes Area?  
 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

*Route 1 to help the Home owners who  
set up with this for years*

**GENERAL COMMENTS**

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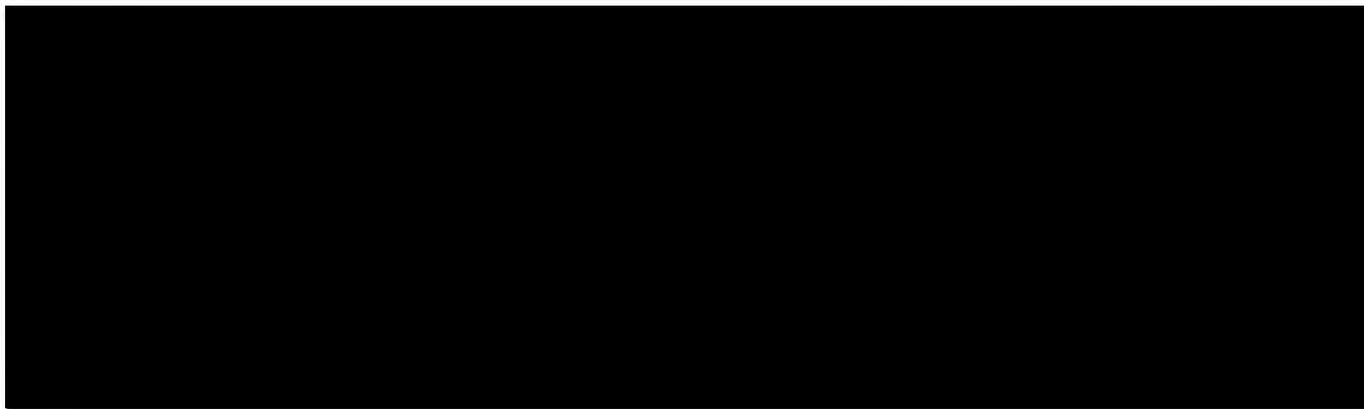
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**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

1. What is your relationship to the Juniper Dunes Area? *(Mark all that apply)*  
 Visitor     Adjacent property owner/resident     Franklin County resident  
 Other: \_\_\_\_\_
2. On average, how many times a year do you visit the Juniper Dunes Area?  
 0     1-2     3-5     6-12     More than 12
3. What type of activities do you do when visiting the Juniper Dunes Area?  
*(Mark all that apply.)*  
 Hiking     Cycling     Off-roading     Hunting     Camping  
 Other: \_\_\_\_\_
4. Which route presented do you prefer?  
 Route 1A     Route 1B     Route 1C     Route 2     I prefer none of these.
5. Do you support this project to provide an access road to the Juniper Dunes Area?  
 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

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**GENERAL COMMENTS**

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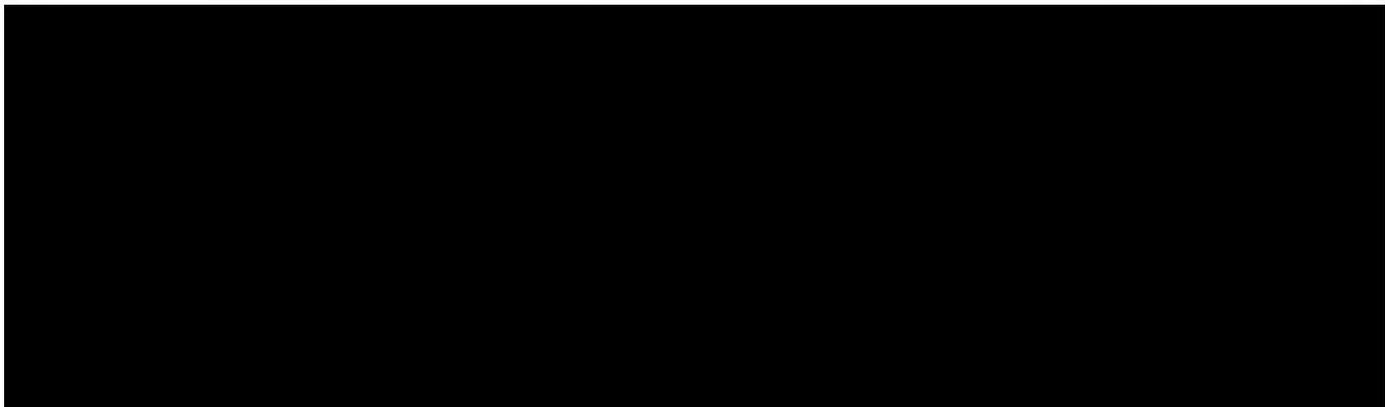
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**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

1. What is your relationship to the Juniper Dunes Area? *(Mark all that apply)*  
 Visitor     Adjacent property owner/resident     Franklin County resident  
 Other: \_\_\_\_\_
2. On average, how many times a year do you visit the Juniper Dunes Area?  
 0     1-2     3-5     6-12     More than 12
3. What type of activities do you do when visiting the Juniper Dunes Area?  
*(Mark all that apply.)*  
 Hiking     Cycling     Off-roading     Hunting     Camping  
 Other: \_\_\_\_\_
4. Which route presented do you prefer? *no preference*  
 Route 1A     Route 1B     Route 1C     Route 2     I prefer none of these.
5. Do you support this project to provide an access road to the Juniper Dunes Area?  
 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

*Access to wilderness area will continue to be a challenge,  
but this will help!*

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**GENERAL COMMENTS**

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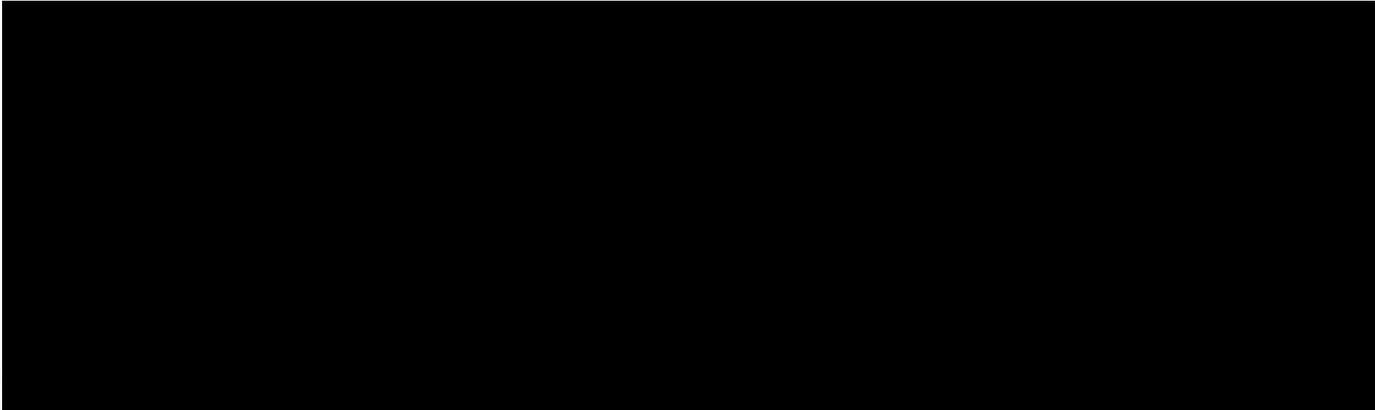
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**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

1. What is your relationship to the Juniper Dunes Area? (Mark all that apply)  
 Visitor     Adjacent property owner/resident     Franklin County resident  
 Other: \_\_\_\_\_

2. On average, how many times a year do you visit the Juniper Dunes Area?  
 0     1-2     3-5     6-12     More than 12

3. What type of activities do you do when visiting the Juniper Dunes Area?  
(Mark all that apply.)  
 Hiking     Cycling     Off-roading     Hunting     Camping  
 Other: N/A

4. Which route presented do you prefer? unsure, not enough info provided.  
 Route 1A     Route 1B     Route 1C     Route 2     I prefer none of these.

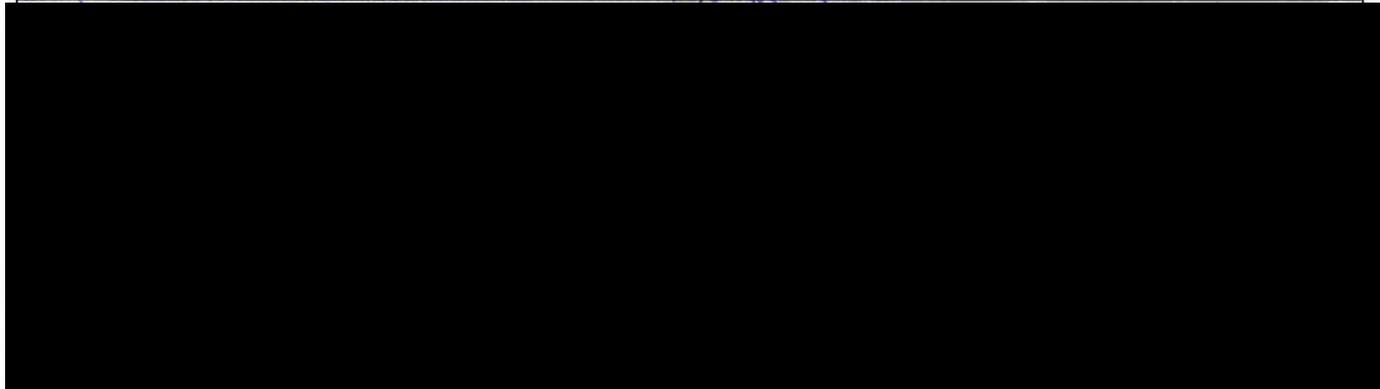
5. Do you support this project to provide an access road to the Juniper Dunes Area?  
 Yes, but...     No     I support an access road, but not through this project.

6. Are there any access problems that you feel this project does not address?

I feel it is imprudent to provide increased access to Juniper Dunes prior to having appropriate supporting infrastructure in place. In addition, the County is struggling to maintain existing gravelled roads so you only have 1 mile to be paved. The remaining

**GENERAL COMMENTS**

gravelled portion will continue to be a rough, un-bladed mess, as ~~are~~ are all existing gravelled roads in the County. And this access appears to attract far more traffic than typical gravelled County Roads. Franklin County ordinances ensure the County is a "Right to Farm" County, and follows the Code of the West. Please listen carefully to the Ag Property Owners that surround & about access to Juniper Dunes, before you make any access decisions. Thank you.



**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

1. What is your relationship to the Juniper Dunes Area? *(Mark all that apply)*  
 Visitor     Adjacent property owner/resident     Franklin County resident  
 Other: Benton County Resident
2. On average, how many times a year do you visit the Juniper Dunes Area?  
 0     1-2     3-5     6-12     More than 12
3. What type of activities do you do when visiting the Juniper Dunes Area?  
*(Mark all that apply.)*  
 Hiking     Cycling     Off-roading     Hunting     Camping  
 Other: \_\_\_\_\_
4. Which route presented do you prefer?  
 Route 1A     Route 1B     Route 1C     Route 2     I prefer none of these.
5. Do you support this project to provide an access road to the Juniper Dunes Area?  
 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

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**GENERAL COMMENTS**

Change the Area of environmental concern to  
a open riding Area.

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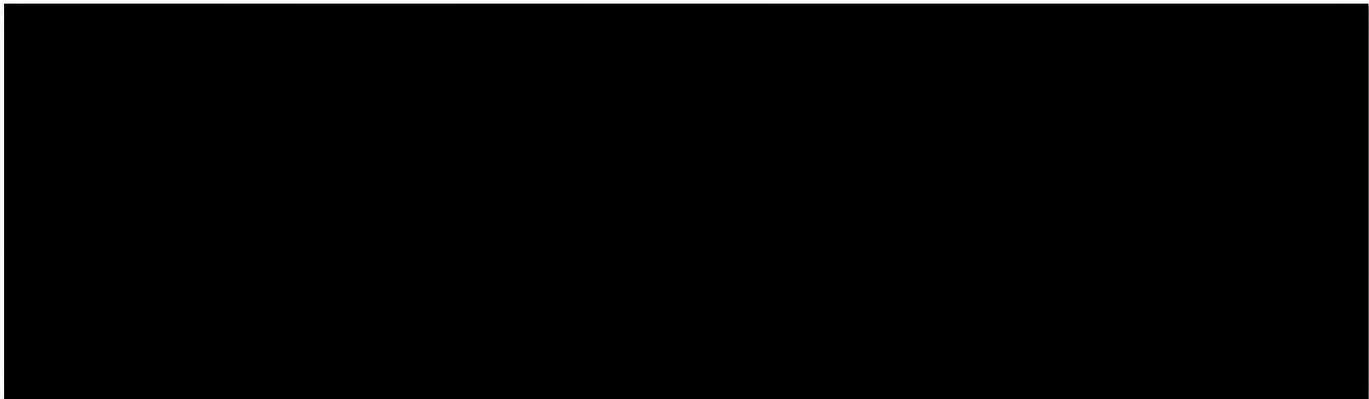
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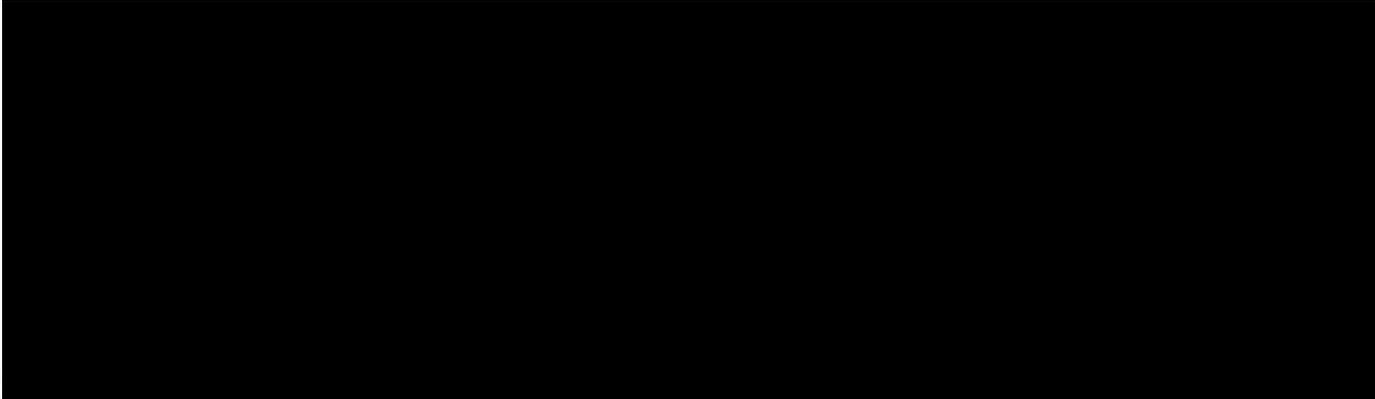
**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

1. What is your relationship to the Juniper Dunes Area? *(Mark all that apply)*  
 Visitor     Adjacent property owner/resident     Franklin County resident  
 Other: \_\_\_\_\_
2. On average, how many times a year do you visit the Juniper Dunes Area?  
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3. What type of activities do you do when visiting the Juniper Dunes Area?  
*(Mark all that apply.)*  
 Hiking     Cycling     Off-roading     Hunting     Camping  
 Other: \_\_\_\_\_
4. Which route presented do you prefer?  
 Route 1A     Route 1B     Route 1C     Route 2     I prefer none of these.
5. Do you support this project to provide an access road to the Juniper Dunes Area?  
 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

Route 1C goes through Smith Canyon  
If Route 2 is chosen, provide access into Smith Canyon  
\_\_\_\_\_  
\_\_\_\_\_

**GENERAL COMMENTS**

This is a much needed project  
Please let dirt bikes and A.T.V.'s continue  
into all places we currently enjoy  
\_\_\_\_\_  
\_\_\_\_\_



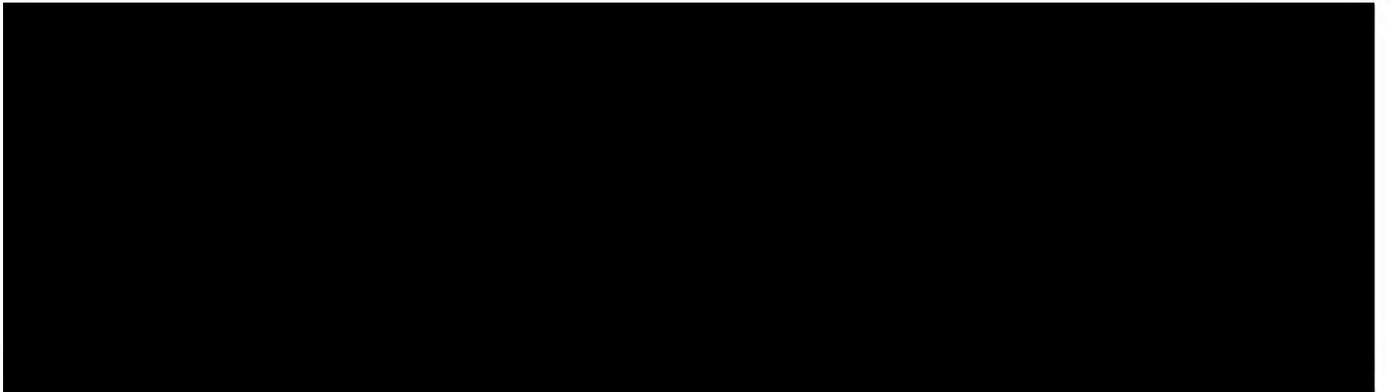
**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

1. What is your relationship to the Juniper Dunes Area? *(Mark all that apply)*  
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 Other: \_\_\_\_\_
2. On average, how many times a year do you visit the Juniper Dunes Area?  
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3. What type of activities do you do when visiting the Juniper Dunes Area?  
*(Mark all that apply.)*  
 Hiking     Cycling     Off-roading     Hunting     Camping  
 Other: \_\_\_\_\_
4. Which route presented do you prefer?  
 Route 1A     Route 1B     Route 1C     Route 2     I prefer none of these.
5. Do you support this project to provide an access road to the Juniper Dunes Area?  
 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

Route 1C is a popular Area to recreate it is  
least preferred as it displaces a good area for  
youth Riders and in experienced Riders.

**GENERAL COMMENTS**

This project is most likely eligible  
for State RCO NOVA Grant as a non-highway  
Road or access for Recreation  
Once the Road is completed funds (Grants) from RCO  
can assist with Signage, Campground development  
or Education/Enforcement  
Federal RTP is another grant Source



**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

1. What is your relationship to the Juniper Dunes Area? *(Mark all that apply)*  
 Visitor     Adjacent property owner/resident     Franklin County resident  
 Other: \_\_\_\_\_
2. On average, how many times a year do you visit the Juniper Dunes Area?  
 0     1-2     3-5     6-12     More than 12
3. What type of activities do you do when visiting the Juniper Dunes Area?  
*(Mark all that apply.)*  
 Hiking     Cycling     Off-roading     Hunting     Camping  
 Other: HORSE RIDING
4. Which route presented do you prefer?  
 Route 1A     Route 1B     Route 1C     Route 2     I prefer none of these.
5. Do you support this project to provide an access road to the Juniper Dunes Area?  
 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**GENERAL COMMENTS**

lets get it done

Tri City Horse clubs will volunteer

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Contact Information - OPTIONAL**

Name: \_\_\_\_\_

Street address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ ZIP: \_\_\_\_\_

Telephone number: \_\_\_\_\_

Email: \_\_\_\_\_

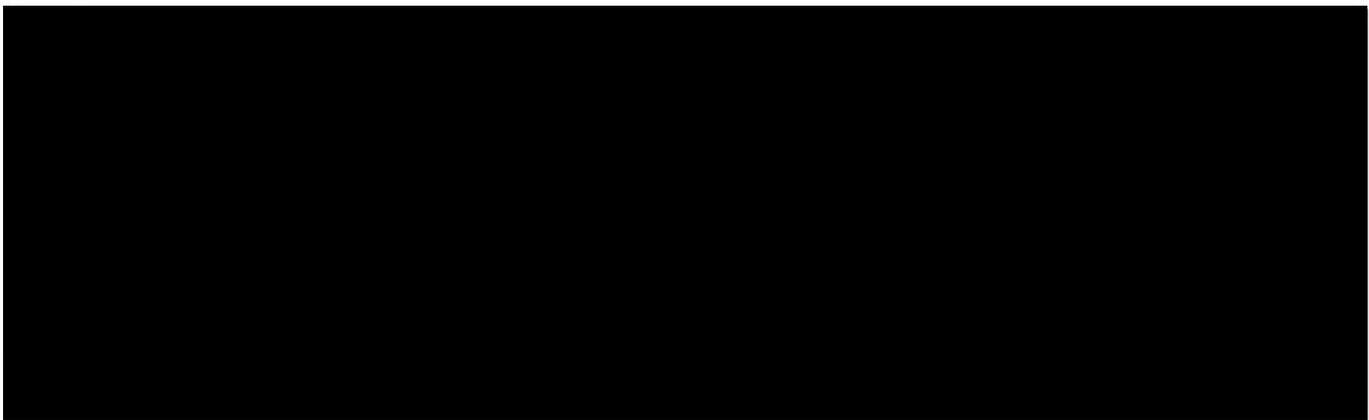
**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

1. What is your relationship to the Juniper Dunes Area? *(Mark all that apply)*  
 Visitor     Adjacent property owner/resident     Franklin County resident  
 Other: BENTON COUNTY RESIDENT
2. On average, how many times a year do you visit the Juniper Dunes Area?  
 0     1-2     3-5     6-12     More than 12
3. What type of activities do you do when visiting the Juniper Dunes Area?  
*(Mark all that apply.)*  
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 Other: \_\_\_\_\_
4. Which route presented do you prefer?  
 Route 1A     Route 1B     Route 1C     Route 2     I prefer none of these.
5. Do you support this project to provide an access road to the Juniper Dunes Area?  
 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

Keeping y<sup>ou</sup> people out of farmers land  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**GENERAL COMMENTS**

This project is a long time coming. It should be a #1  
priority as this a very popular riding area  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

1. What is your relationship to the Juniper Dunes Area? *(Mark all that apply)*  
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 Other: \_\_\_\_\_
2. On average, how many times a year do you visit the Juniper Dunes Area?  
 0     1-2     3-5     6-12     More than 12
3. What type of activities do you do when visiting the Juniper Dunes Area?  
*(Mark all that apply.)*  
 Hiking     Cycling     Off-roading     Hunting     Camping  
 Other: Farm
4. Which route presented do you prefer?  
 Route 1A     Route 1B     Route 1C     Route 2     I prefer none of these.
5. Do you support this project to provide an access road to the Juniper Dunes Area?  
 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

NO

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**GENERAL COMMENTS**

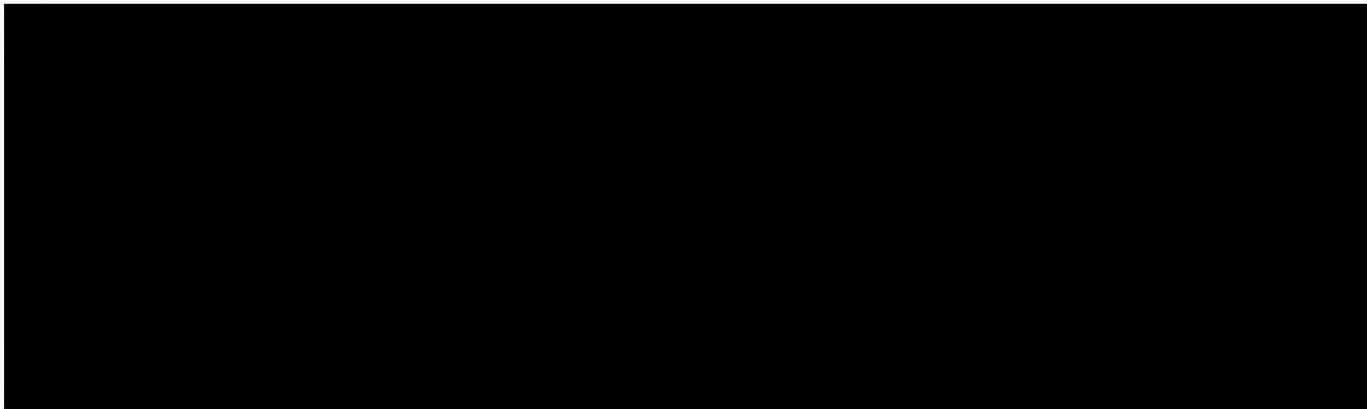
Route 2 most appealing because of the shift into BLM Area to cut down on impact on farm center pivots, especially if road is fenced.

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**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

1. What is your relationship to the Juniper Dunes Area? *(Mark all that apply)*  
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 Yes         No         I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

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**GENERAL COMMENTS**

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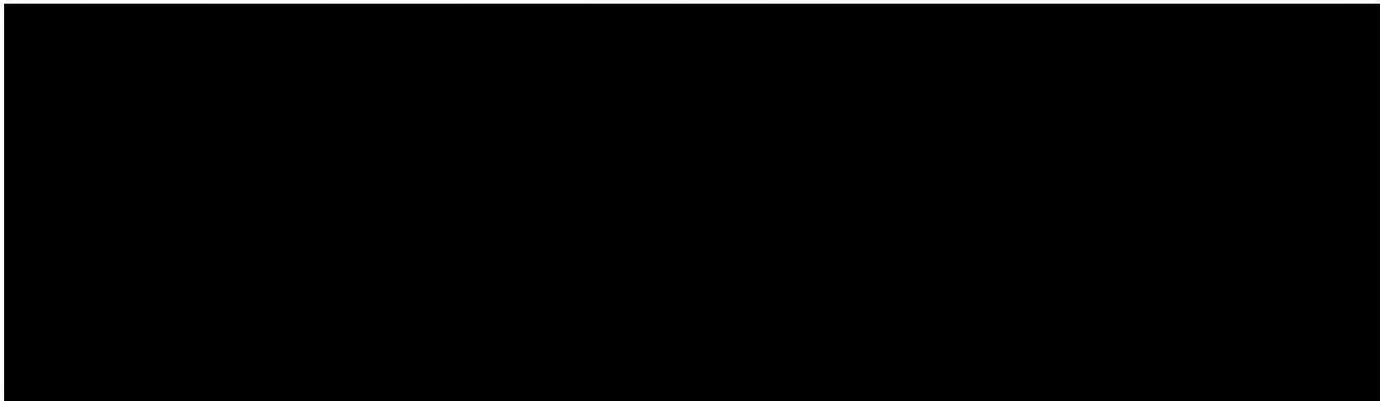
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**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

1. What is your relationship to the Juniper Dunes Area? *(Mark all that apply)*  
 Visitor     Adjacent property owner/resident     Franklin County resident  
 Other: \_\_\_\_\_
2. On average, how many times a year do you visit the Juniper Dunes Area?  
 0     1-2     3-5     6-12     More than 12
3. What type of activities do you do when visiting the Juniper Dunes Area?  
*(Mark all that apply.)*  
 Hiking     Cycling     Off-roading     Hunting     Camping  
 Other: \_\_\_\_\_
4. Which route presented do you prefer?  
 Route 1A     Route 1B     Route 1C     Route 2     I prefer none of these.
5. Do you support this project to provide an access road to the Juniper Dunes Area?  
 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

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**GENERAL COMMENTS**

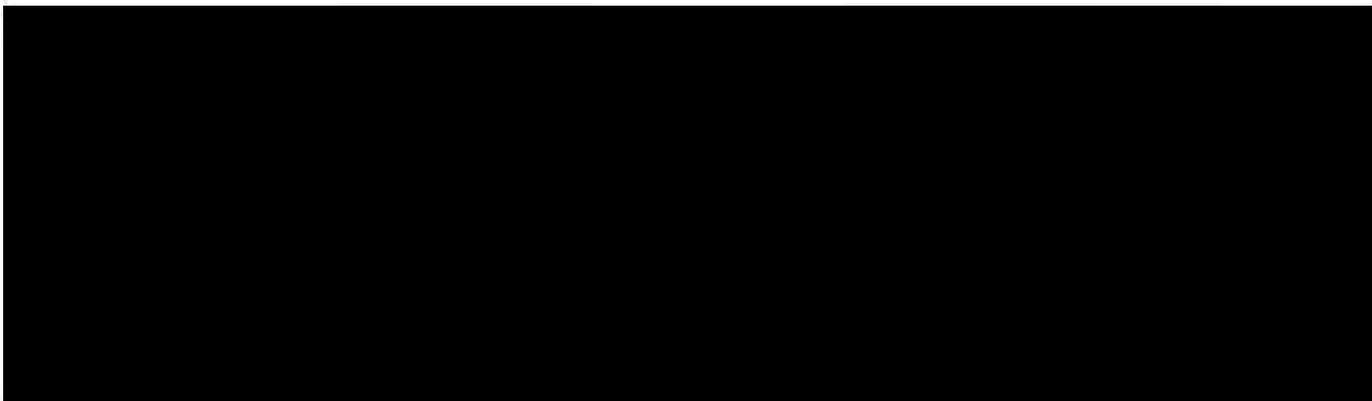
Need to have good exits off the Road so that you can pull a large camper into the camping area.

Need to leave Smith Canyon accessable - It makes a great family area.

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**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

1. What is your relationship to the Juniper Dunes Area? *(Mark all that apply)*  
 Visitor     Adjacent property owner/resident     Franklin County resident  
 Other: \_\_\_\_\_

2. On average, how many times a year do you visit the Juniper Dunes Area?  
 0     1-2     3-5     6-12     More than 12

3. What type of activities do you do when visiting the Juniper Dunes Area?  
*(Mark all that apply.)*  
 Hiking     Cycling     Off-roading     Hunting     Camping  
 Other: \_\_\_\_\_

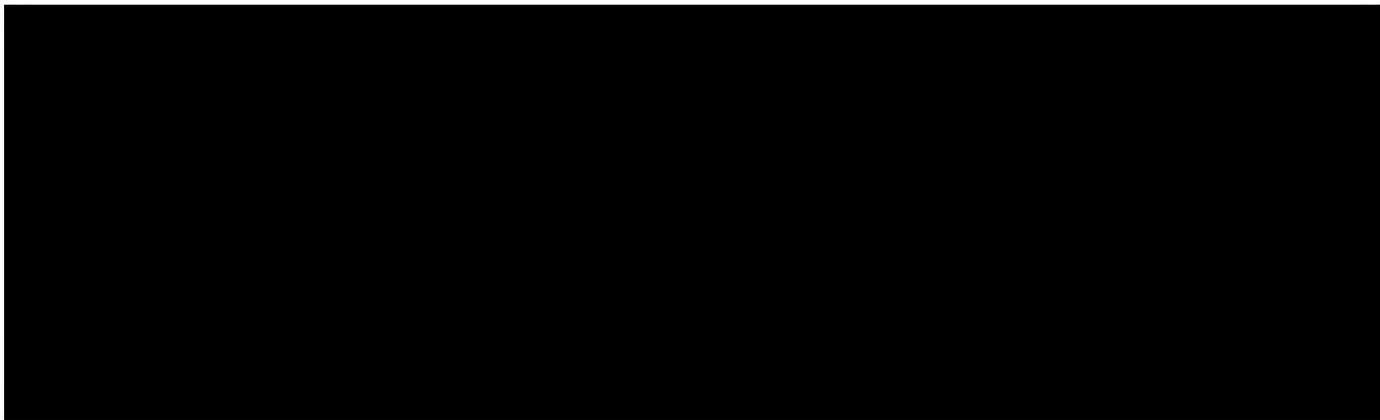
4. Which route presented do you prefer?  
 Route 1A     Route 1B     Route 1C     Route 2     I prefer none of these.

5. Do you support this project to provide an access road to the Juniper Dunes Area?  
 Yes     No     I support an access road, but not through this project.

6. Are there any access problems that you feel this project does not address?  
*I feel that the projects are encroaching on ~~the~~ it feel that*  
*the road should be made and also extra parking spots made*

**GENERAL COMMENTS**

*with the addition of access, the need for ~~gas~~ garbage facilities*  
*is of great concern, also would like to see more areas opened*  
*up.*



**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

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 Other: \_\_\_\_\_
2. On average, how many times a year do you visit the Juniper Dunes Area?  
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 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

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**GENERAL COMMENTS**

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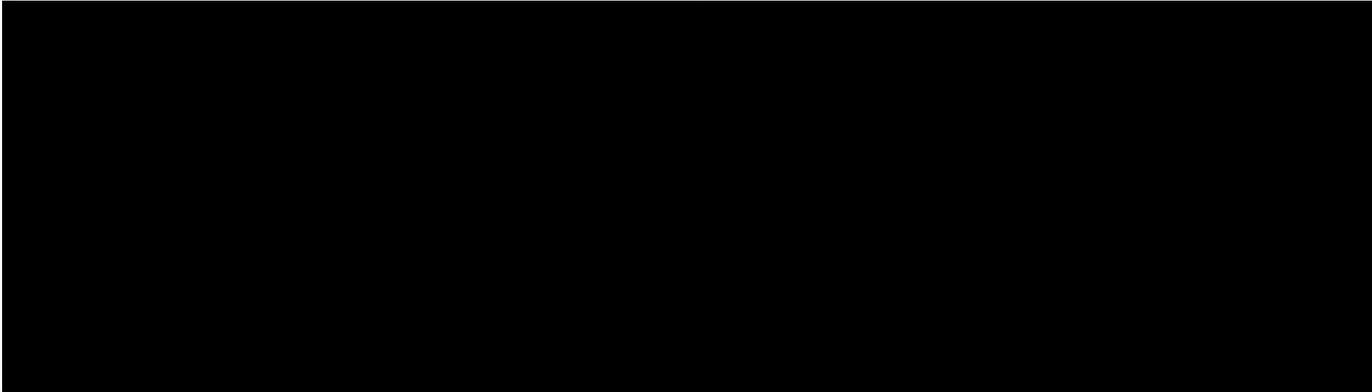
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**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

1. What is your relationship to the Juniper Dunes Area? (Mark all that apply)  
 Visitor     Adjacent property owner/resident     Franklin County resident  
 Other: Nikea Jeep owner
2. On average, how many times a year do you visit the Juniper Dunes Area?  
 0     1-2     3-5     6-12     More than 12
3. What type of activities do you do when visiting the Juniper Dunes Area?  
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 Hiking     Cycling     Off-roading     Hunting     Camping  
 Other: \_\_\_\_\_
4. Which route presented do you prefer?  
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5. Do you support this project to provide an access road to the Juniper Dunes Area?  
 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

the costs of each route and the impact on the current Areas including Oru and the aq. properties. Not to mention all the land owners that don't know about this project

**GENERAL COMMENTS**

I am more for plan 1A because I feel that it will keep the integrity of the offroad areas that are out of the ohv areas that are on 1A and C but if we could keep those areas I would prefer Route 2 because it would move the road away from the current problem • Multiple unload areas to slow down  
• the current 1A and 1C areas are great areas for kids  
• There should be a shoulder for ATVs to keep road up and Conges



**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

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 Visitor     Adjacent property owner/resident     Franklin County resident  
 Other: \_\_\_\_\_
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 Other: \_\_\_\_\_
4. Which route presented do you prefer?  
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 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

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**GENERAL COMMENTS**

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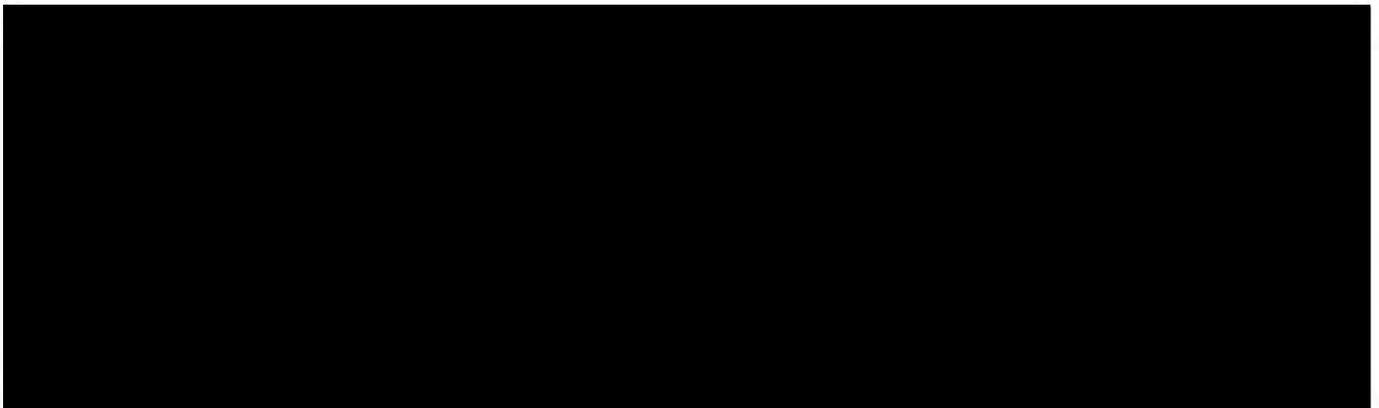
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**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

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 Visitor     Adjacent property owner/resident     Franklin County resident  
 Other: \_\_\_\_\_
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6. Are there any access problems that you feel this project does not address?

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**GENERAL COMMENTS**

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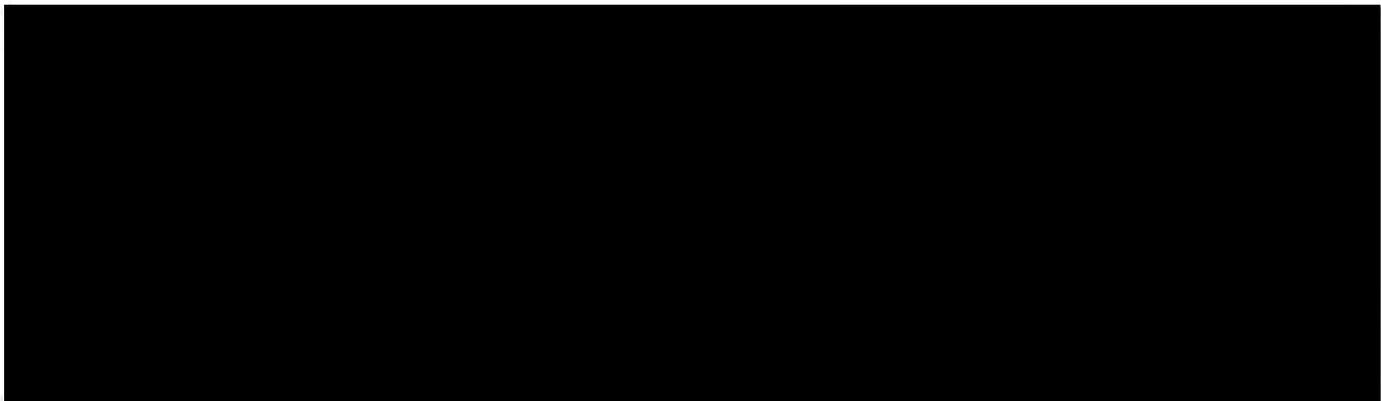
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**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

1. What is your relationship to the Juniper Dunes Area? *(Mark all that apply)*  
 Visitor     Adjacent property owner/resident     Franklin County resident  
 Other: BENTON COUNTY RESIDENT
2. On average, how many times a year do you visit the Juniper Dunes Area?  
 0     1-2     3-5     6-12     More than 12
3. What type of activities do you do when visiting the Juniper Dunes Area?  
*(Mark all that apply.)*  
 Hiking     Cycling     Off-roading     Hunting     Camping  
 Other: \_\_\_\_\_
4. Which route presented do you prefer?  
 Route 1A     Route 1B     Route 1C     Route 2     I prefer none of these.
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 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

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**GENERAL COMMENTS**

Cost

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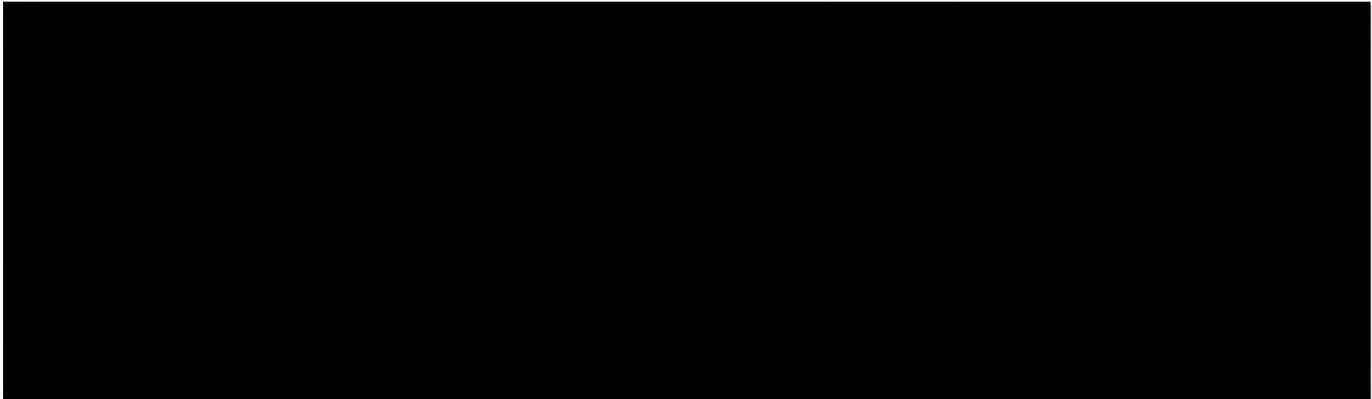
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**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

1. What is your relationship to the Juniper Dunes Area? *(Mark all that apply)*  
 Visitor     Adjacent property owner/resident     Franklin County resident  
 Other: Benton County
2. On average, how many times a year do you visit the Juniper Dunes Area?  
 0     1-2     3-5     6-12     More than 12
3. What type of activities do you do when visiting the Juniper Dunes Area?  
*(Mark all that apply.)*  
 Hiking     Cycling     Off-roading     Hunting     Camping  
 Other: \_\_\_\_\_
4. Which route presented do you prefer?  
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 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

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**GENERAL COMMENTS**

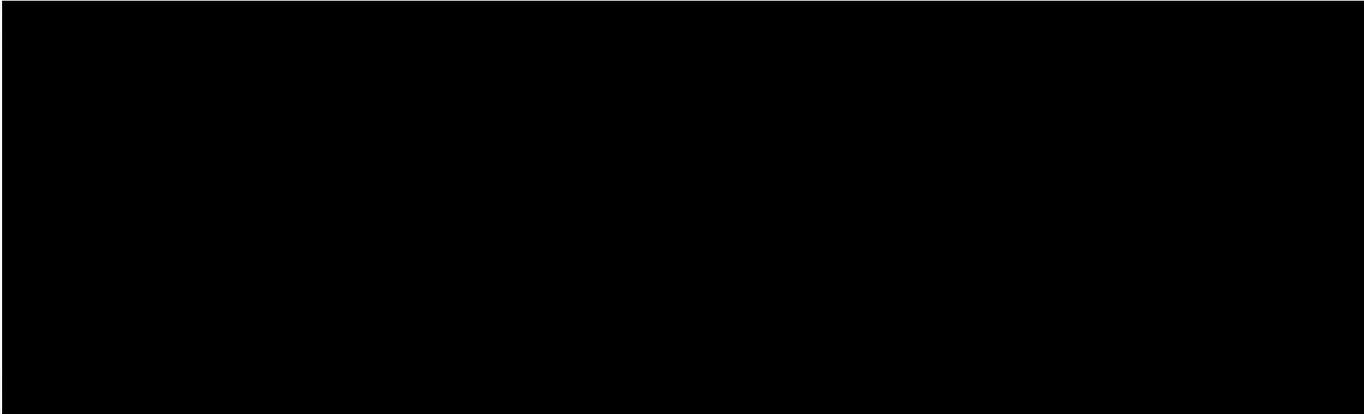
1 Trash control  
2 No paddle tires! Hoopiepers & dirt bikes  
3 drag main trails yearly

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**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

1. What is your relationship to the Juniper Dunes Area? *(Mark all that apply)*  
 Visitor     Adjacent property owner/resident     Franklin County resident  
 Other: \_\_\_\_\_
2. On average, how many times a year do you visit the Juniper Dunes Area?  
 0     1-2     3-5     6-12     More than 12
3. What type of activities do you do when visiting the Juniper Dunes Area?  
*(Mark all that apply.)*  
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 Other: \_\_\_\_\_
4. Which route presented do you prefer?  
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5. Do you support this project to provide an access road to the Juniper Dunes Area?  
 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

An alternate Route To the North From Elm  
Road at Hwy 395 near E. Itopeia

**GENERAL COMMENTS**

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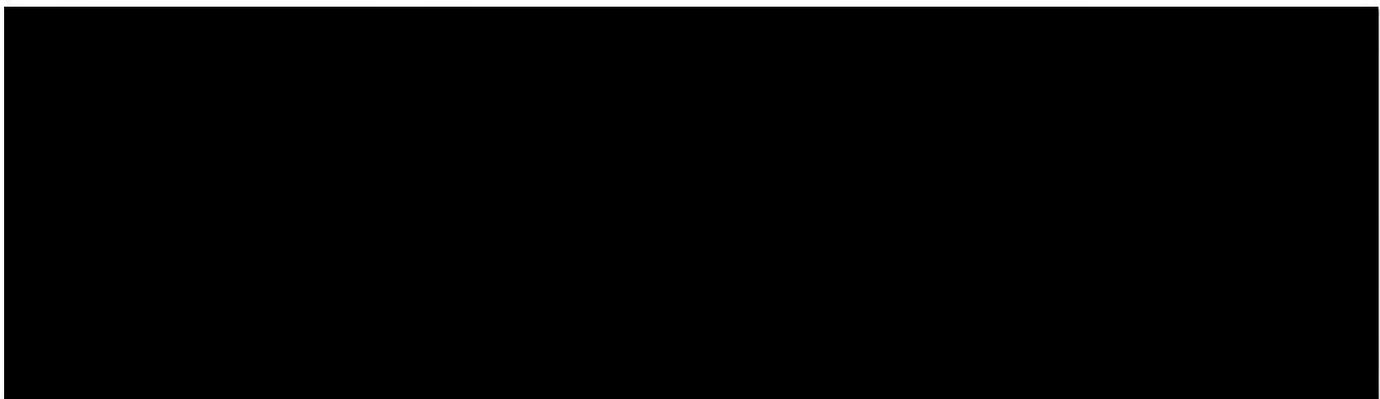
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**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

1. What is your relationship to the Juniper Dunes Area? *(Mark all that apply)*

- Visitor     Adjacent property owner/resident     Franklin County resident  
 Other: \_\_\_\_\_

2. On average, how many times a year do you visit the Juniper Dunes Area?

- 0     1-2     3-5     6-12     More than 12    (20 to 30)

3. What type of activities do you do when visiting the Juniper Dunes Area?  
*(Mark all that apply.)*

- Hiking     Cycling     Off-roading     Hunting     Camping  
 Other: \_\_\_\_\_

4. Which route presented do you prefer?

- Route 1A     Route 1B     Route 1C     Route 2     I prefer none of these.

5. Do you support this project to provide an access road to the Juniper Dunes Area?

- Yes     No     I support an access road, but not through this project.

6. Are there any access problems that you feel this project does not address?

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**GENERAL COMMENTS**

open up more OHV area

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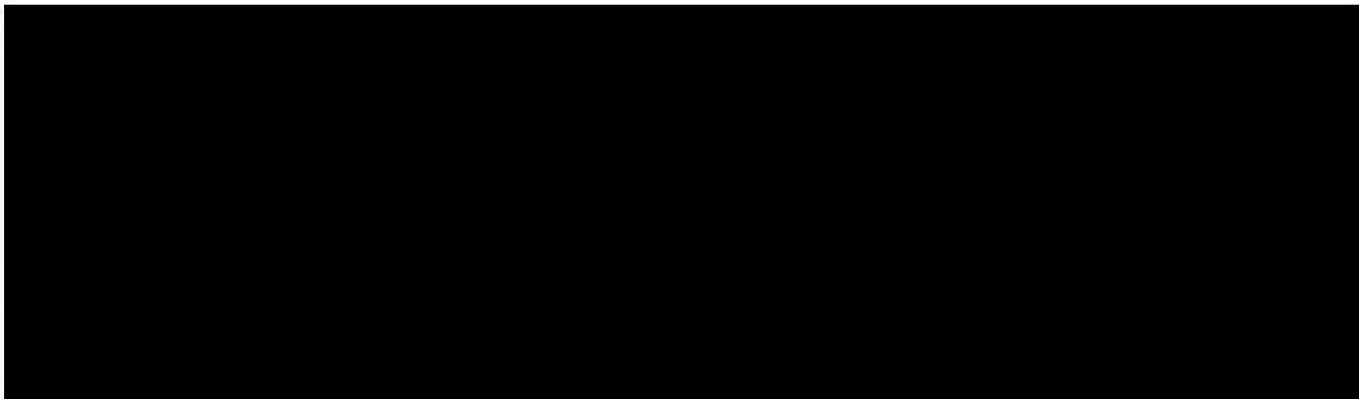
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**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

1. What is your relationship to the Juniper Dunes Area? *(Mark all that apply)*  
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 Other: \_\_\_\_\_
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*(Mark all that apply.)*  
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 Other: \_\_\_\_\_
4. Which route presented do you prefer?  
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 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

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**GENERAL COMMENTS**

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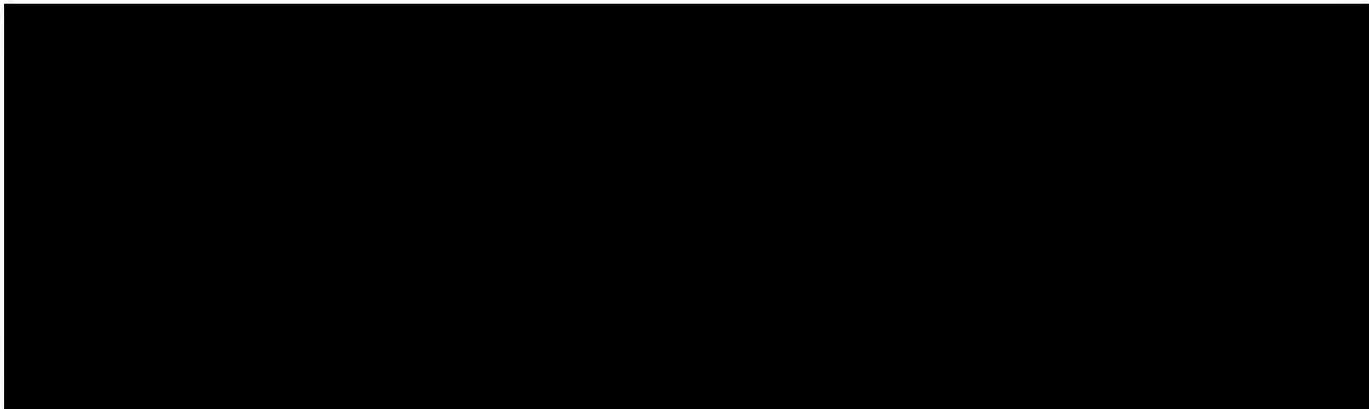
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**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

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 Other: \_\_\_\_\_
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3. What type of activities do you do when visiting the Juniper Dunes Area?  
*(Mark all that apply.)*  
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 Other: \_\_\_\_\_
4. Which route presented do you prefer?  
 Route 1A     Route 1B     Route 1C     Route 2     I prefer none of these.
5. Do you support this project to provide an access road to the Juniper Dunes Area?  
 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

Private land owners adjacent to property  
claiming rights

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**GENERAL COMMENTS**

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_



**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

1. What is your relationship to the Juniper Dunes Area? *(Mark all that apply)*  
 Visitor     Adjacent property owner/resident     Franklin County resident  
 Other: \_\_\_\_\_
2. On average, how many times a year do you visit the Juniper Dunes Area?  
 0     1-2     3-5     6-12     More than 12
3. What type of activities do you do when visiting the Juniper Dunes Area?  
*(Mark all that apply.)*  
 Hiking     Cycling     Off-roading     Hunting     Camping  
 Other: pick up trash, metal detect
4. Which route presented do you prefer? *whatever zone used now is*  
 Route 1A     Route 1B     Route 1C     Route 2     I prefer none of these.
5. Do you support this project to provide an access road to the Juniper Dunes Area?  
 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

No.

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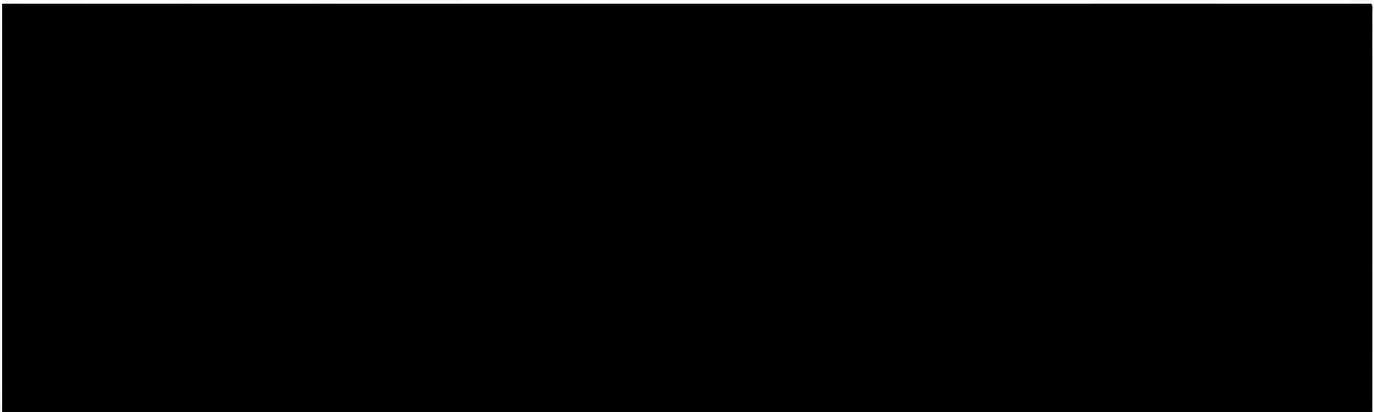
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**GENERAL COMMENTS**

I feel being able to have access is important. We need to be able to have this done. I would be willing to pay higher sales tax to be able to have access. I want + need to have Juniper Dunes available. My family enjoys being able to ride + have recreation in the Dunes.



**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
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 Other: \_\_\_\_\_
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 Other: \_\_\_\_\_
4. Which route presented do you prefer?  
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5. Do you support this project to provide an access road to the Juniper Dunes Area?  
 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

*fixing the road*

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**GENERAL COMMENTS**

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**Contact Information - OPTIONAL**

Name: \_\_\_\_\_

Street address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ ZIP: \_\_\_\_\_

Telephone number: \_\_\_\_\_

Email: \_\_\_\_\_

**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

1. What is your relationship to the Juniper Dunes Area? *(Mark all that apply)*  
 Visitor     Adjacent property owner/resident     Franklin County resident  
 Other: \_\_\_\_\_
2. On average, how many times a year do you visit the Juniper Dunes Area?  
 0     1-2     3-5     6-12     More than 12
3. What type of activities do you do when visiting the Juniper Dunes Area?  
*(Mark all that apply.)*  
 Hiking     Cycling     Off-roading     Hunting     Camping  
 Other: exercising second Amendment
4. Which route presented do you prefer?  
 Route 1A     Route 1B     Route 1C     Route 2     I prefer none of these.
5. Do you support this project to provide an access road to the Juniper Dunes Area?  
 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

~~Route 1A~~    ~~Route 1B~~    ~~Route 1C~~

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**GENERAL COMMENTS**

Why not create a new road or  
use route B and extend to the north

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

<b><u>Contact Information - OPTIONAL</u></b>			
Name: _____			
Street address: _____			
City: _____	State: _____	ZIP: _____	
Telephone number: _____			
Email: _____			

**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

1. What is your relationship to the Juniper Dunes Area? *(Mark all that apply)*  
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 Other: \_\_\_\_\_
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5. Do you support this project to provide an access road to the Juniper Dunes Area?  
 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

NO not at this time

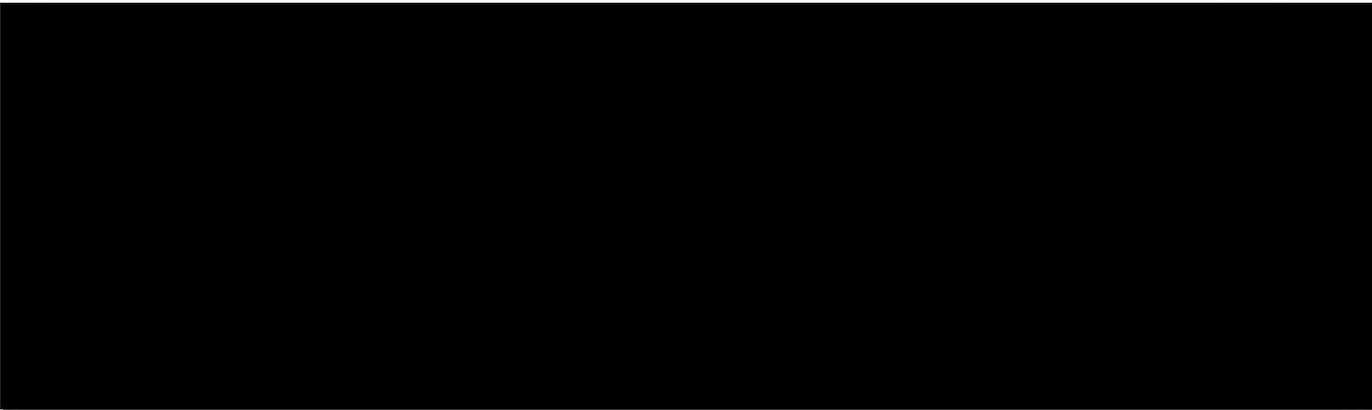
\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**GENERAL COMMENTS**

Me and my family use that area every week almost all year we PICNIC CAMP off road quading and it is the only place left around the tricities that you can use for these purposes I have lived in this area for 40 years and have seen dozens of areas closed or developed !! People need places to get AWAY!



**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

1. What is your relationship to the Juniper Dunes Area? *(Mark all that apply)*  
 Visitor     Adjacent property owner/resident     Franklin County resident  
 Other: \_\_\_\_\_

2. On average, how many times a year do you visit the Juniper Dunes Area?  
 0     1-2     3-5     6-12     More than 12

3. What type of activities do you do when visiting the Juniper Dunes Area?  
*(Mark all that apply.)*  
 Hiking     Cycling     Off-roading     Hunting     Camping  
 Other: Horse Riding

4. Which route presented do you prefer?  
 Route 1A     Route 1B     Route 1C     Route 2     I prefer none of these.

5. Do you support this project to provide an access road to the Juniper Dunes Area?  
 Yes     No     I support an access road, but not through this project.

6. Are there any access problems that you feel this project does not address?  
Yes, I feel like there are alternative Routes via  
BLM land that is not offered as an option

**GENERAL COMMENTS**

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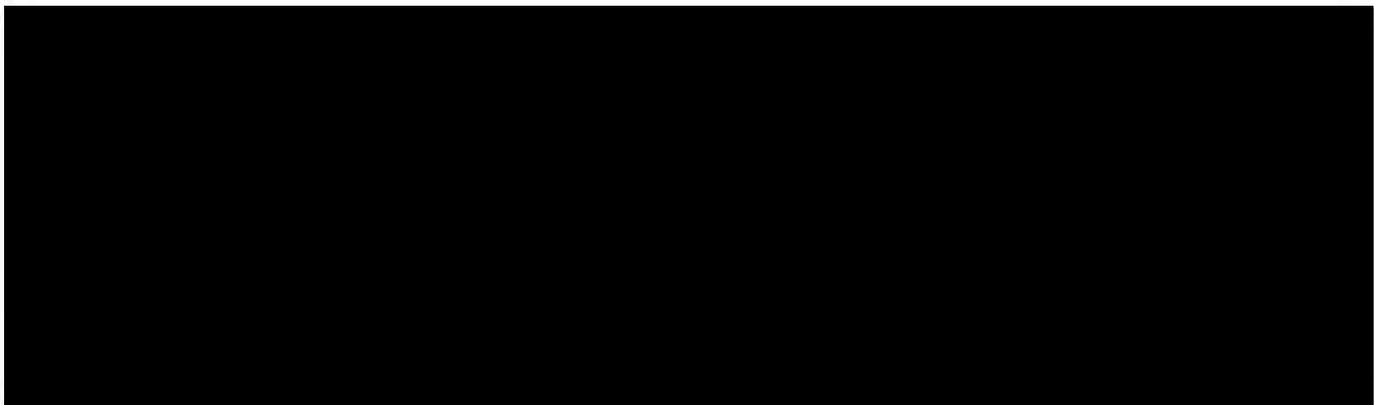
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**JUNIPER DUNES ACCESS ROAD OPEN HOUSE**  
**PUBLIC QUESTIONNAIRE**

1. What is your relationship to the Juniper Dunes Area? *(Mark all that apply)*  
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 Other: \_\_\_\_\_
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*(Mark all that apply.)*  
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 Other: \_\_\_\_\_
4. Which route presented do you prefer?  
 Route 1A     Route 1B     Route 1C     Route 2     I prefer none of these.
5. Do you support this project to provide an access road to the Juniper Dunes Area?  
 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?

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**GENERAL COMMENTS**

*Let's get it done. Maintain access to Smith Canyon*

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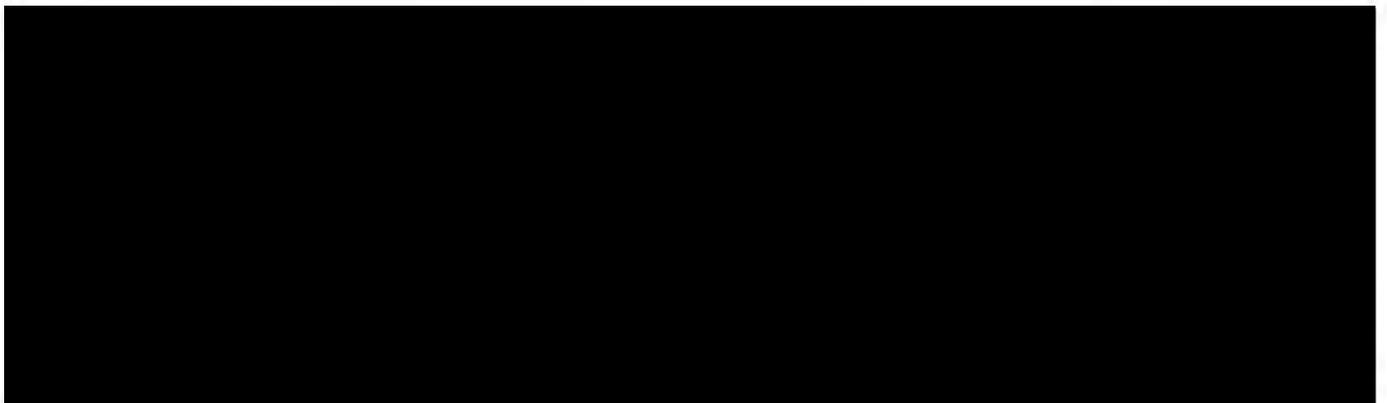
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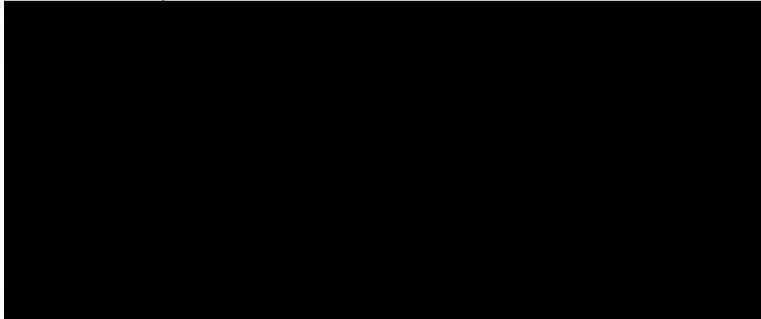
# FRANKLIN COUNTY

## PUBLIC WORKS DEPARTMENT

**Matt Mahoney**, Public Works Director  
**Matthew S. Rasmussen, PE**, County Engineer/Asst. Director

June 25, 2014

MR-14-046



Franklin County is planning a project to provide access to the Juniper Dunes Wilderness Area. In order to comply with state and federal regulations regarding wildlife and the environment, the Franklin County Public Works Department must complete a preliminary survey of the land. This survey will occur along two routes being considered for the access, as shown on the attached map. The routes will be in the proximity of your property [REDACTED]. Depending on the final layout, Franklin County may need to purchase property along the selected route.

A consultant for the Public Works Department will be in the area of the proposed project from approximately June 29, 2014, to July 11, 2014. During that time, they will need access to your property along the boundary stated above.

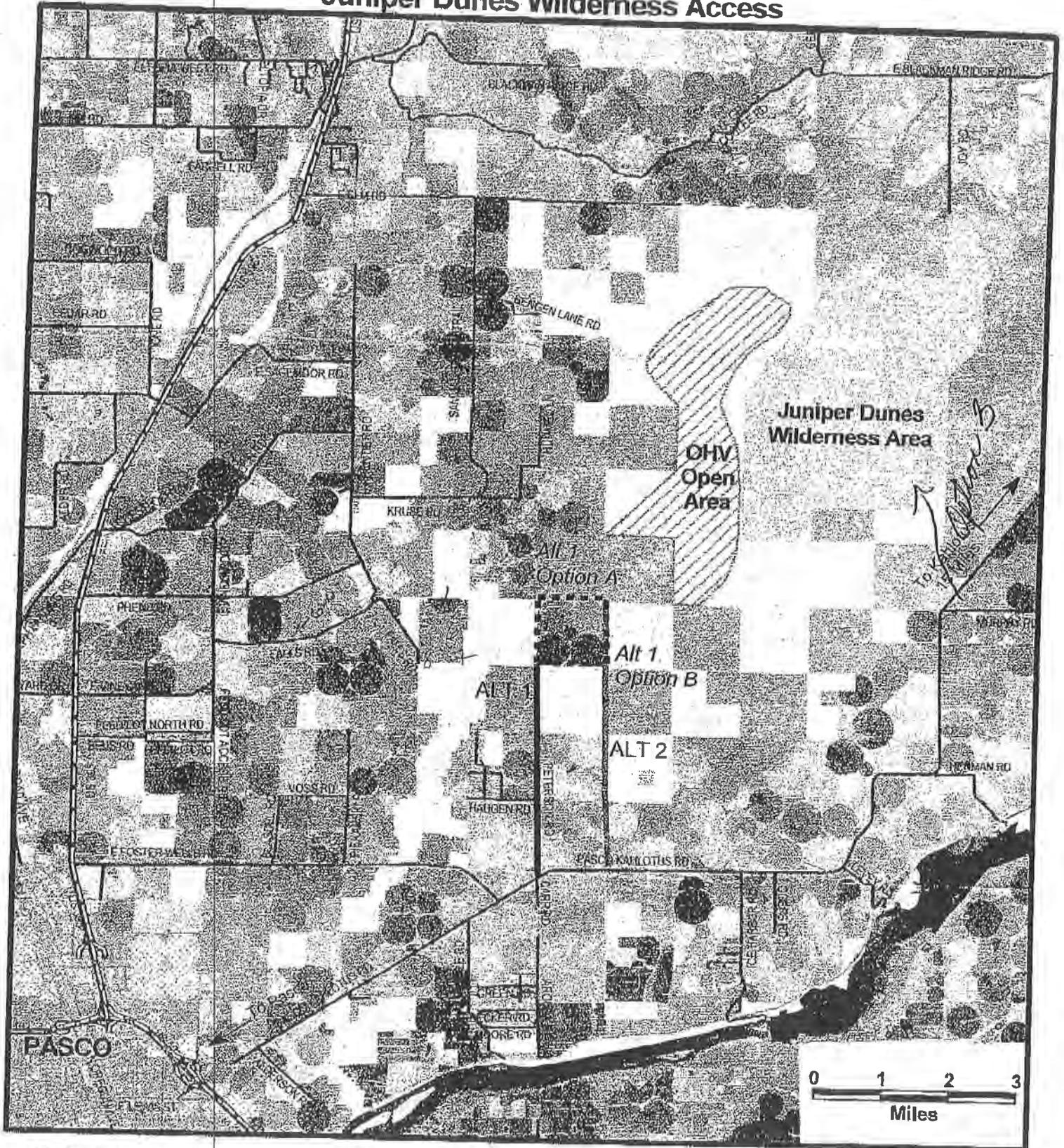
We will also be hosting a public meeting on July 31, 2014 at the TRAC in Pasco. The meeting will occur from 6pm to 8pm and is an opportunity for you to come and learn more about the project and express any concerns that you may have.

If you have any questions, please feel free to contact me. I can be reached at 509.545.3514 or at [mrasmussen@co.franklin.wa.us](mailto:mrasmussen@co.franklin.wa.us).

Sincerely,

  
Matt Rasmussen, P.E.  
Franklin County Engineer

# Juniper Dunes Wilderness Access



**Legend**

	OHV Open Area		Private Land Owner		County Road
	Wilderness Area		City Limits		City Road
	Federal Lands		Freeway/Highway		Private Road



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 All information depicted herein is provided "as-is," with the warranty, expressed or implied, of accuracy or information. No guarantee of information, accuracy, reliability or availability is intended, implied, or expressed. Neither Franklin County nor the Franklin County Public Works Department, shall be liable for any errors or omissions made or required by the provided information. Franklin County and the Franklin County Public Works Department shall be held defenseless for any loss, direct or indirect, consequential or subsequent, related to the use of the information or any information derived from this information.

JUNIPER DUNES ACCESS ROAD OPEN HOUSE  
PUBLIC QUESTIONNAIRE

1. What is your relationship to the Juniper Dunes Area? (Mark all that apply)  
 Visitor     Adjacent property owner/resident     Franklin County resident  
 Other:

---

2. On average, how many times a year do you visit the Juniper Dunes Area?  
 0     1-2     3-5     6-12     More than 12
3. What type of activities do you do when visiting the Juniper Dunes Area?  
(Mark all that apply.)  
 Hiking     Cycling     Off-roading     Hunting     Camping  
 Other:

---

4. Which route presented do you prefer?  
 Route 1A     Route 1B     Route 1C     Route 2     I prefer none of these. *Route 3*
5. Do you support this project to provide an access road to the Juniper Dunes Area?  
 Yes     No     I support an access road, but not through this project.
6. Are there any access problems that you feel this project does not address?  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

GENERAL COMMENTS

*Why aren't we considering Option 3. That is the shortest distance from a good road. If people could go across fewer miles, new road and less property owners are affected. (See map), meaning less road to build and less property to buy.*

\_\_\_\_\_  
\_\_\_\_\_

RECEIVED

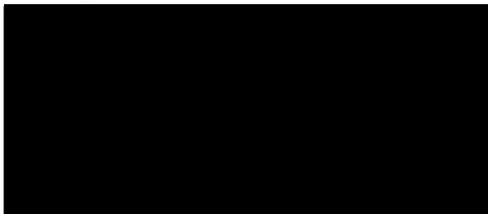
SEP 03 2014

To Franklin County Commissioners and Road Dept.

FRANKLIN COUNTY  
PUBLIC WORKS DEPT.

My name is Steve DeRuyter. I am a first generation in the United States dairy farmer who has based my livelihood upon my dairy operation. My wife Sharon and I have three children who now are integrated into our farm that also live off of the farm as well as our many employees that rely on us for a stable lifestyle. We have been dairy farming in Franklin County since 2001. In the almost 14 years that we have resided in this county my wife and I have generated a substantial tax base, and have been active in our community. The investment that we have also made in our farming operation is the reason why we are writing to you. Our farm is an isolated place for the safety of my cattle and our employees, we are out of the way and do not bother anyone where we are located and we would like to remain that way. With the introduction of the access to the juniper dunes we fear that this seclusion may be interrupted. We have had some times in the past catching people trespassing on our property, or racing past our cows, and we fear that the access to the dunes will further that problem. We do not want a dairy vs public conflict, and my wife and I owe it to my operation and the numerous people we suppose to please ask you to look at all access points. The access point that seems to make a reasonable amount of sense to us is off of the P-K highway past Carr farms or Joy road to the north end of the Dunes. This route is most favorable because of the small amount of impact it will create for people that live in our area. We feel that there is a fiduciary responsibility to look at all access points and find the estimated costs. As tax payers and members of the community we feel it is only fair that the community has access to the dunes, but this access shouldn't disrupt or cause problems for the people that live near the dunes. There should be a reasonable and logical point of access for the entire community and I employ you to help us find it.

Sincerely,



## English-Young, Seth (FHWA)

---

**From:** English-Young, Seth (FHWA)  
**Sent:** Monday, September 22, 2014 12:34 PM  
**To:** [REDACTED]  
**Cc:** Wong, Keith (FHWA); Grant Dejongh (gdejongh@co.franklin.wa.us)  
**Subject:** RE: Juniper Dunes Area Access Road

[REDACTED]  
Thank you for your comments and questions. I've addressed them below:

1. I see your point. Most people would probably go to Peterson Road initially, and maybe still use it for a while. However, if there are clear signs saying the access is 1 mile away, and the new access road is paved for a portion and the gravel portion is maintained, and if the property owner at the end of Peterson Road closes the gate, then my opinion that almost all users would eventually use the new road. That being said, if Route 1 is chosen, it does eliminate the need to have to direct people take a new route.

Regarding access to private property, the project proposes to include fencing on the sides of the road, as necessary. Hopefully, that will keep most road users out of private property, while still allowing property owners access to their land.

2. The irrigation line in Peterson Road will likely require replacement if the access road is constructed there due to the condition of the pipe. As it is aged and deteriorated, attempting to build on it would run both the risk of it breaking during construction and it breaking subsequent to the new road being built, both of which are unacceptable for the project. Respective of whether the line is moved or not, the existing pipe will need to be replaced prior to construction. As for other utilities in the roadway, those will be determined on a case-by case basis once the final road location and alignment is selected. Specifically regarding the power poles, they can be supported (for work around their bases) or moved by the agency that owns them. The cost of this support or relocation would then be paid as part of this project.

Hope this answers your questions. Thank you for the email, I will be sending out updates as the project progresses.

Seth English-Young  
Environmental Specialist  
Federal Highway Administration  
Western Federal Lands  
610 East Fifth Street  
Vancouver, WA 98661  
360-619-7803

[REDACTED]  

---

**To:** Wong, Keith (FHWA); English-Young, Seth (FHWA)  
**Subject:** Juniper Dunes Area Access Road

Gentlemen

I would like to thank you for the information you provided to the public at the open house on July 31. After the meeting, I turned in my questionnaire with my comments. Hopefully, you received the promised follow-up information from various members of the audience.

I have some additional comment/questions I would like to share with you.

1. Upon further reflection, I feel it would be best to use Route 1, not Route 2. People are so driven by habit that they would continue using Peterson Road, even if an alternate, paved route (Route 2) was available. The only way to prevent them from using Peterson Road is to completely eliminate access, which is impossible. They would find a way around any gate/barrier you installed.

Since there is no way to prevent the use of Route 1 (Peterson Road), I would recommend the selection of Route 1 as the access road to the Juniper Dunes area. Selecting Route 2 would result in damage to private property along both Peterson Road and Route 2. You need to do everything possible to limit the possibility of further damage. Unfortunately, people today are not as respectful of other people's property as they should be and don't think twice about riding thru fields and chasing livestock on their ATVs.

Several years ago two black angus bulls walked past the back of our property and allowed us to "shoo" them into one of our empty pastures. Those bulls were exhausted and looking for a quiet place to hide. With the help of a neighbor the owner was located, and they made it back to their girls safely (no thanks to the people that chased them away from their herd). Some ATV riders don't think beyond the fun they have chasing animals or riding thru fields. Something needs to be done to ensure they have limited access to areas where there are crops and livestock. If the bulls had hurt someone or damaged property, it would have been the fault of the ATV riders, not the owner of the bulls. Unfortunately, the owner of the bulls is the one most people would have blamed.

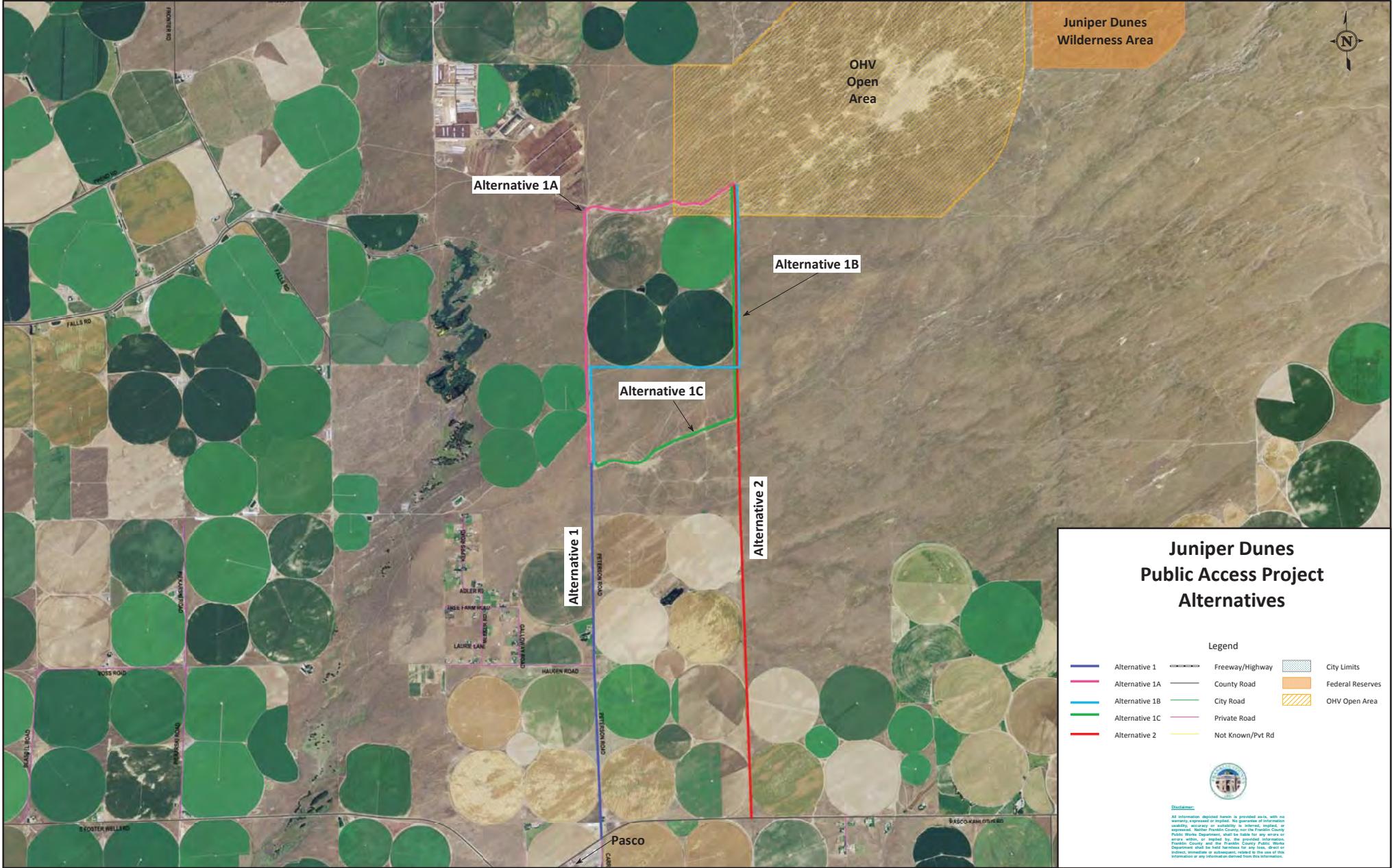
2. If Peterson Road is chosen to be the access road and is upgraded, will you be moving the power poles? If not, were you going to leave the irrigation "main line" in the ground? Given how close the irrigation risers are to the power poles, I wasn't sure how you could remove the irrigation line without causing the power poles to fall. When I look at how far pavement is from most power poles, I couldn't help wondering how leaving the irrigation line in the ground would cause a problem. Couldn't you just remove the risers and plugging the hole in the main line? The same is true of the telephone cable that is currently on the east side of Peterson Road. Is it down deep enough that it could be left in the ground and a new cable installed? Taking things out of the ground is expensive and time consuming!

Some types of construction are complicated beyond imagination. As a former employee of a Licensing and Environmental Programs group, I fully understand how challenging this project will be and look forward to hearing from you on the status of the Juniper Dunes Area Access Road.

Good Luck!! (You're going to need it!!!)

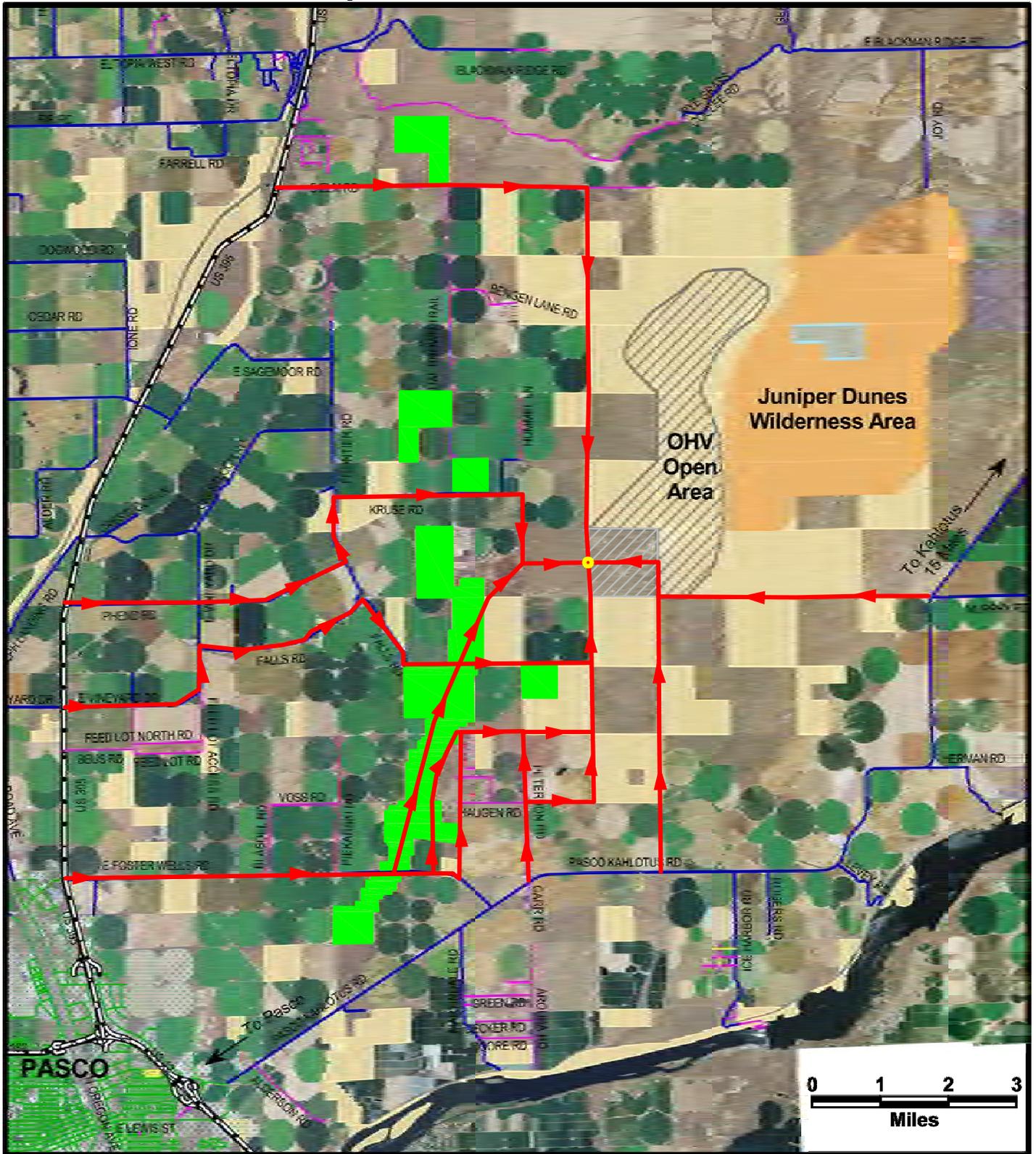


Appendix D  
Map of Reasonable Range of Alternatives



Appendix E  
Map of Alternatives Considered but Dismissed

# ALTERNATIVES CONSIDERED BUT DISMISSED



- Legend**
- OHV Open Area
  - Private Land Owner
  - County Road
  - Wilderness Area
  - City Limits
  - City Road
  - Federal Lands
  - Freeway/Highway
  - Private Road
  - Bureau of Reclamation Land
  - Alternative Routes Considered and Dismissed
  - Staging Area



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**APPENDIX C**  
Wetland Determination Memo



DAVID EVANS  
AND ASSOCIATES INC.

---

## MEMORANDUM

**DATE:** July 15, 2014  
**TO:** Seth English-Young  
Western Federal Lands Highway Division  
610 E. Fifth Street  
Vancouver, WA 98661  
**FROM:** Ethan Rosenthal  
**SUBJECT:** **Wetland Determination**  
**PROJECT:** FHAX00000213 - Juniper Dunes Access Road, WA Franklin 2013(1)  
**COPIES:** File

---

This memorandum provides a summary of wetland reconnaissance work conducted for the Juniper Dunes Access Road project, located in Franklin County, Washington. David Evans and Associates, Inc. (DEA) conducted a wetland reconnaissance site visit on July 2 and 3, 2014 in which no wetlands or waterways were observed within the project study area. Details of the site investigation and background research are provided below.

### **METHODS**

#### **Study Area**

The project study area was defined as a 200-foot corridor (100 feet to each side) along proposed project road alternative centerlines. The study area is shown on attached Figure 1. The entire study area was reviewed during the July 3, 2014 site visit.

#### **Preliminary Resource Review**

Reference materials were reviewed prior to the field investigation to provide information regarding the possible presence of wetlands, water features, hydric soils, wetland hydrology, and site topography. The materials reviewed included:

- ESRI, ArcGIS Online, USA Topographic Maps, 30x60 GRID Walla Walla, WA, 1980 and Richland 1978 (see Figure 1)
- ESRI, ArcGIS Online, USA Topographic Quad Maps, Levey SW, WA, 1991 (see Figure 2)
- USFWS, National Wetlands Inventory (NWI), Wetlands Mapper, 2014 (see Figure 2)
- Natural Resource Conservation Service (NRCS), Soil Survey Geographic (SSURGO) database for Franklin County, WA 2013 (see Figure 3)
- ESRI, ArcGIS Online, World Imagery. Microsoft 2010. (see Figure 4)
- Franklin County, WA GIS tax lot layer. 2014 (see Figure 4)

#### **Field Methods**

Wetland delineation field work occurred on July 2 and 3, 2014. The wetland delineation was conducted using the Level 2 Routine Delineation Method described in the U.S. Army Corps of Engineers (USACE) Wetlands Delineation Manual (Environmental Laboratory 1987) and further supported by the Arid West Regional Supplement (Supplement) to the Corps of Engineers Wetland Delineation Manual (USACE 2008). This method

requires the simultaneous presence of hydrophytic vegetation, hydric soils, and positive wetland hydrology in wetland delineations. No site specific changes to these methods were necessary.

Areas in which wetland hydrology, hydric soils, and hydrophytic vegetation were all present were considered wetlands. As no wetlands or areas that may potentially be wetlands were observed, formal wetland sampling plots were not recorded, but general plant community data was noted.

## **SITE DESCRIPTION**

The project study area is situated approximately eight miles northeast of Pasco, Washington along the western edge of the Juniper Dunes area managed by the U.S. Bureau of Land Management (BLM). The area resides within the Columbia Plateau ecoregion and is consistent with typical land cover for the ecoregion, which includes sagebrush steppe, grasslands, and agricultural production. The study area crosses a patchwork of privately owned lands and lands managed by BLM. Private lands contain irrigated cropland (primarily center pivot irrigation) and highly disturbed lands in between the irrigation circles. BLM lands contain sagebrush and upland grassland habitats containing a mix of native and non-native plant species. Off road vehicle (ORV) use occurs within BLM land.

The area is arid with no surface water or evidence of water based erosion/scouring present. Soils types range from sandy loams to loamy sands, with some small pockets of pure sand. Topography is relatively level to moderately sloping along the west side of the study area, which follows an existing gravel private road. Topography along the eastern portion of the study area consisted of more varied terrain, with somewhat level topography at the southern end and hilly topography in the middle and northern sections.

## **RESULTS**

Review of existing map data revealed no mapped drainages, wetlands, or hydric soils within the project study area (see attached Figures 1, 2, 3, and 4). Similarly, no potential wetland or waterway features were observed during the field reconnaissance. Field sampled soils were consistent with soil survey mapping in that they ranged from deep sandy loam to loamy sand, which results in very well drained soils unlikely to result in the formation of hydric soils especially given the arid nature of the area. The study area consists entirely of upland plant communities. No potential hydrophytic plant communities (i.e., wetland plant communities) were observed and therefore formal wetland delineation sampling plots were not conducted. Sagebrush habitats were typically dominated by big sagebrush (*Artemisia tridentata*), Russian thistle (*Salsola kali*), and cheatgrass (*Bromus tectorum*), with patches of escaped wheat cultivars (*Triticum* sp.) occurring in areas near agricultural fields. Needle and thread grass (*Hesperostipa comata*) was also observed as a dominant in areas of sagebrush habitat found along portions of the Alternative 2 alignment. Upland grassland habitats were dominated by cheatgrass and escaped wheat cultivars. Remaining areas within the study area either consisted of gravel roadway, dirt roadway/ORV paths, and agricultural crops.

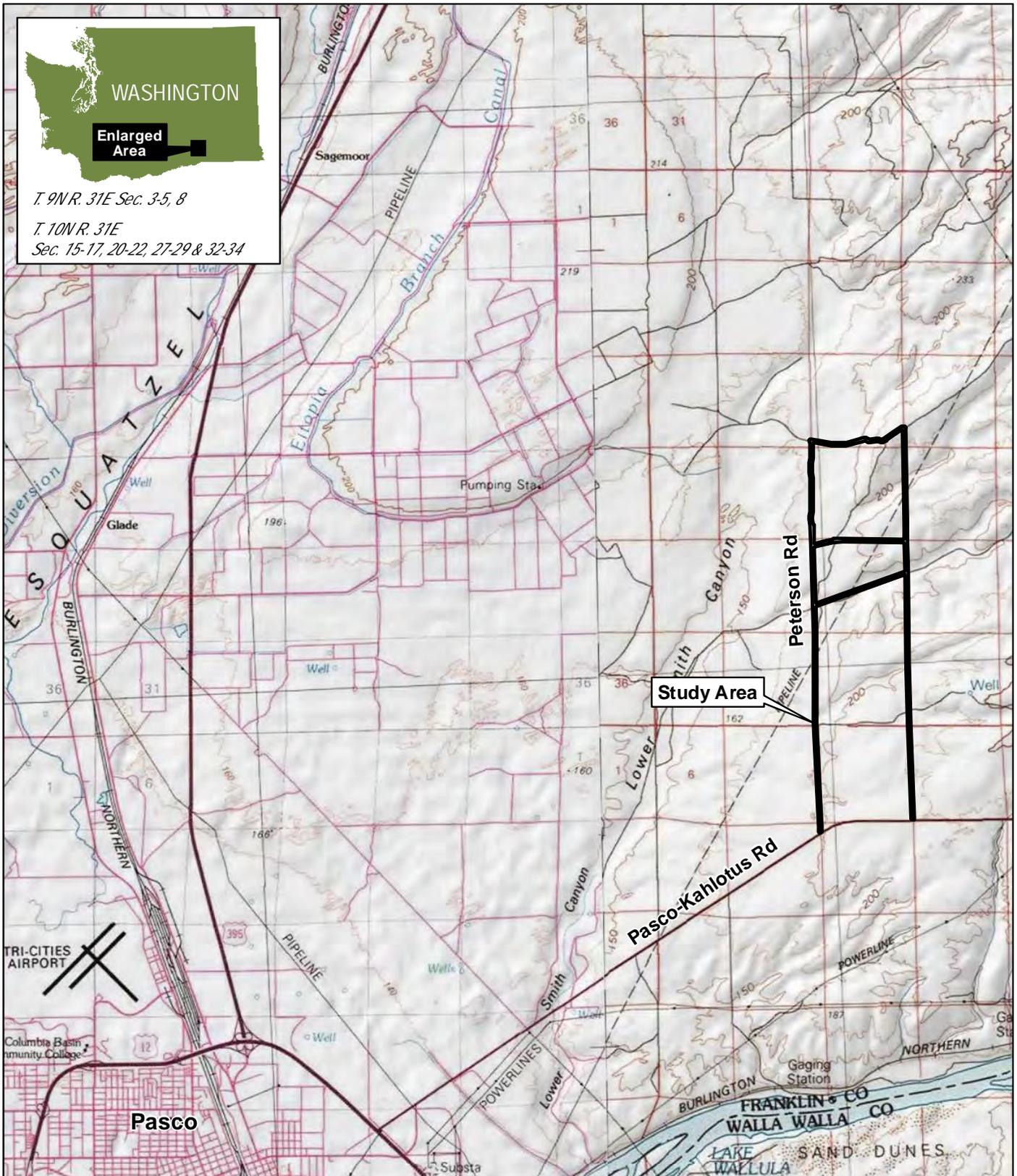
Attachments/Enclosures:

Figure 1 Vicinity Map

Figure 2 National Wetlands Inventory

Figure 3 Soil Survey

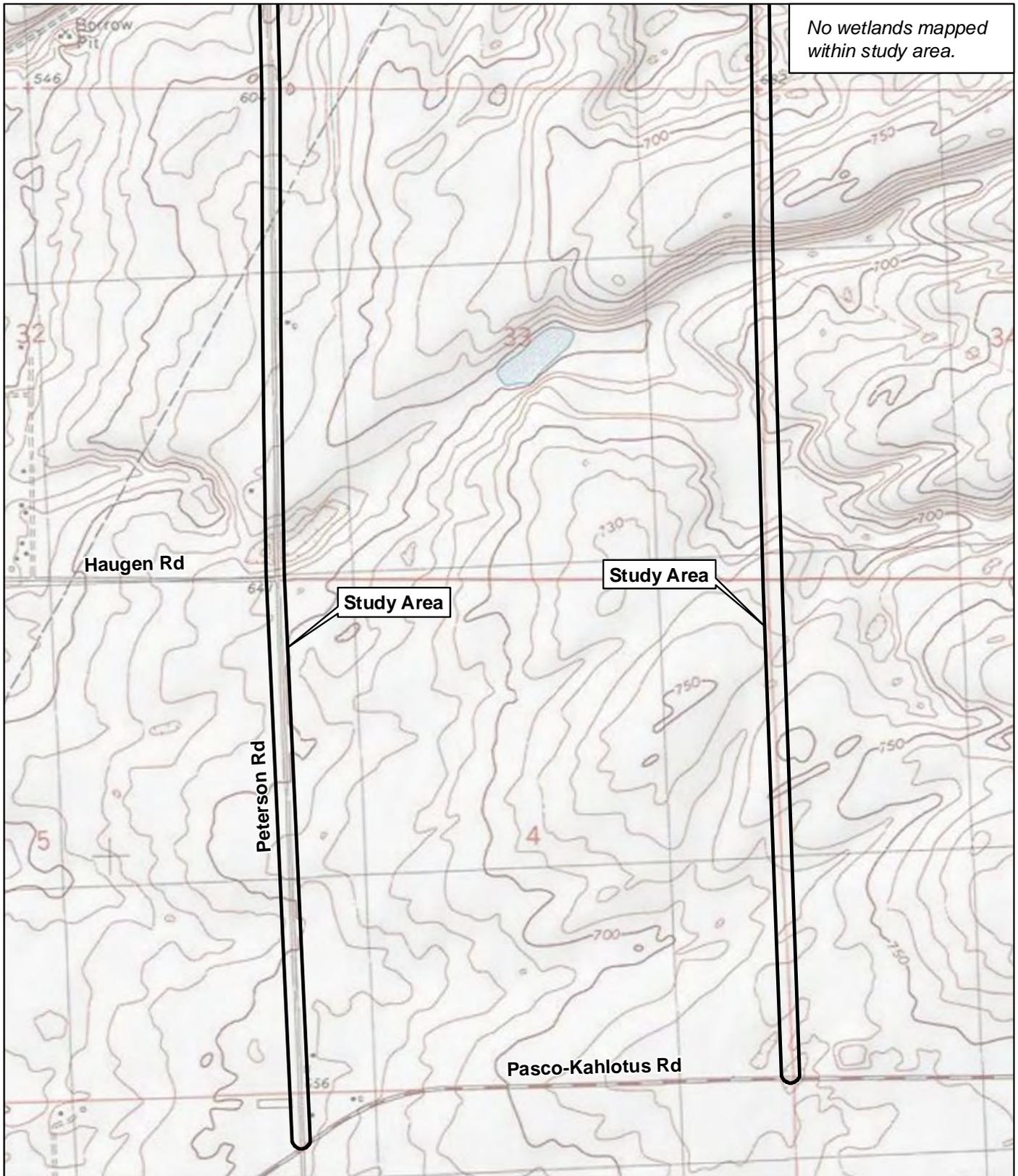
Figure 4 Aerial Photo



ESRI, ArcGIS Online, USA Topographic Maps. 30x60 GRID.  
 1980. Walla Walla, Washington; 1978. Richland, Washington.

**Figure 1**  
 Vicinity

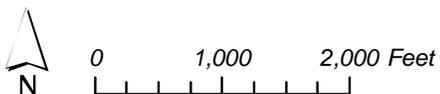


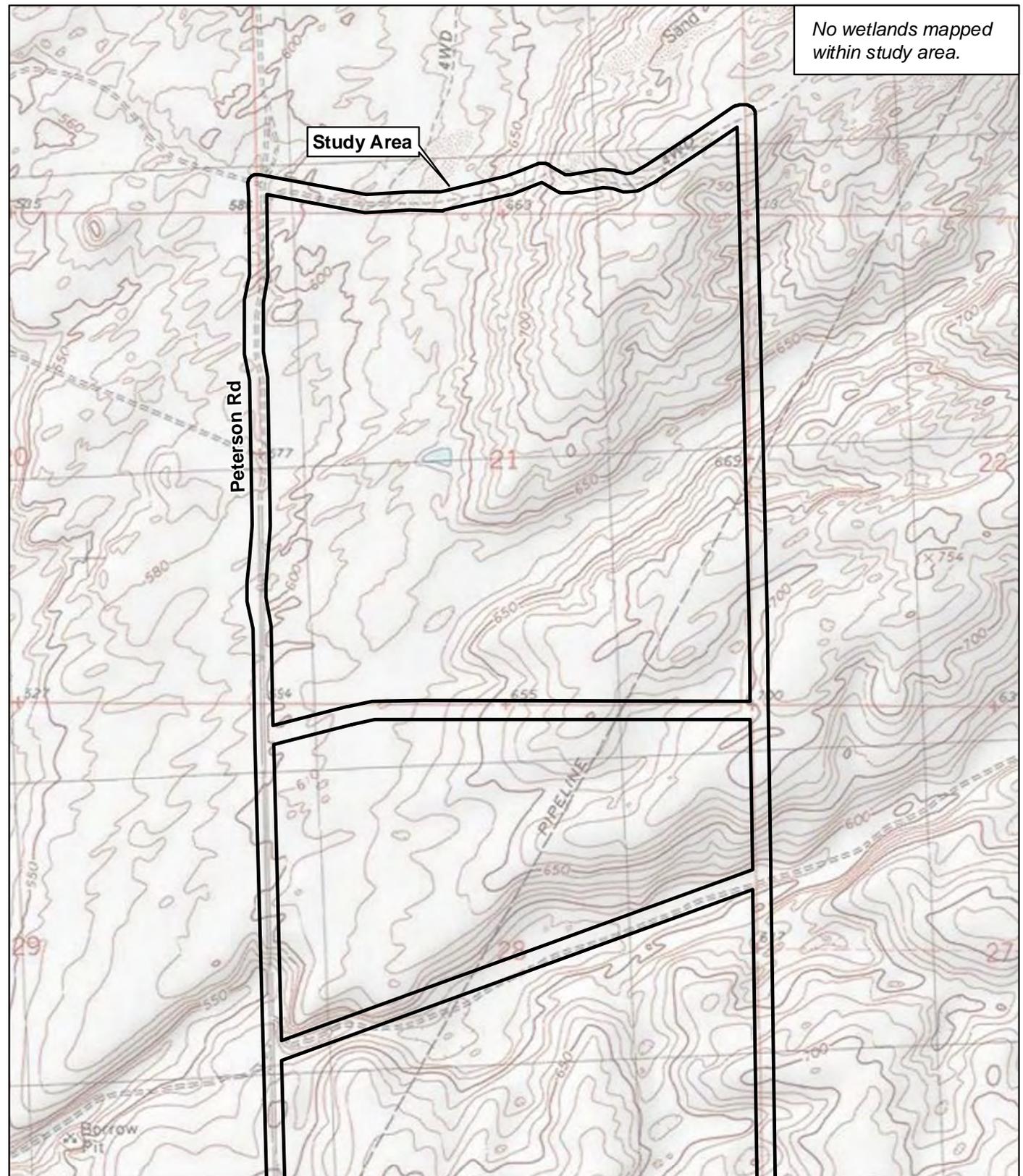


ESRI, ArcGIS Online, USA Topographic Maps. 1991. Levey SW, Washington.

US Fish and Wildlife Service. 2010. National Wetlands Inventory (1977 to present).  
Branch of Habitat Assessment.

**Figure 2, Sheet 1**  
National Wetlands Inventory

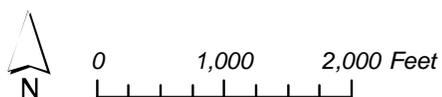


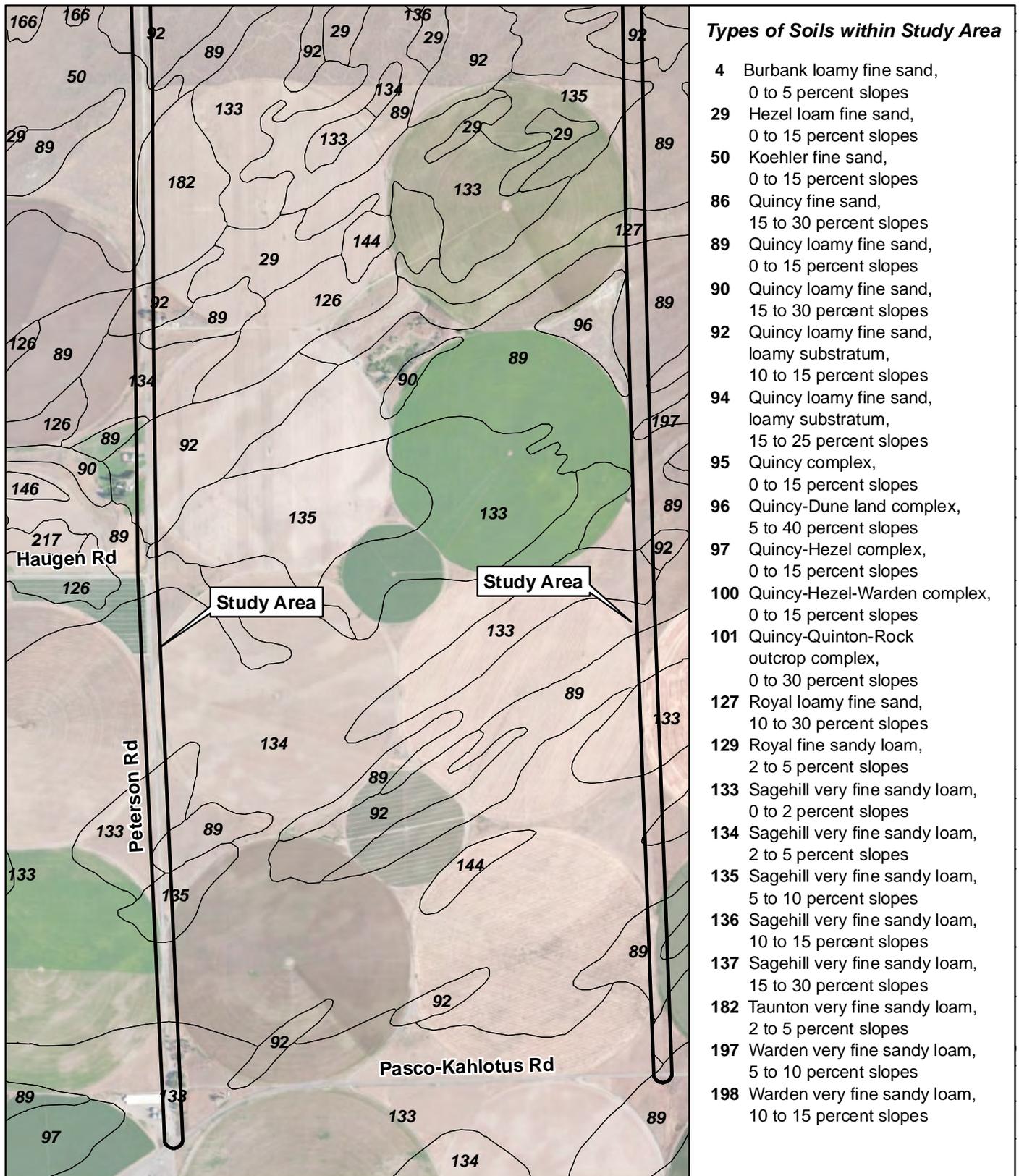


ESRI, ArcGIS Online, USA Topographic Maps. 1991. Levey SW, Washington.

US Fish and Wildlife Service. 2010. National Wetlands Inventory (1977 to present).  
Branch of Habitat Assessment.

**Figure 2, Sheet 2**  
National Wetlands Inventory

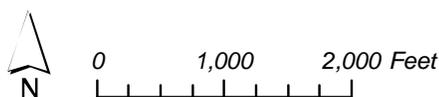




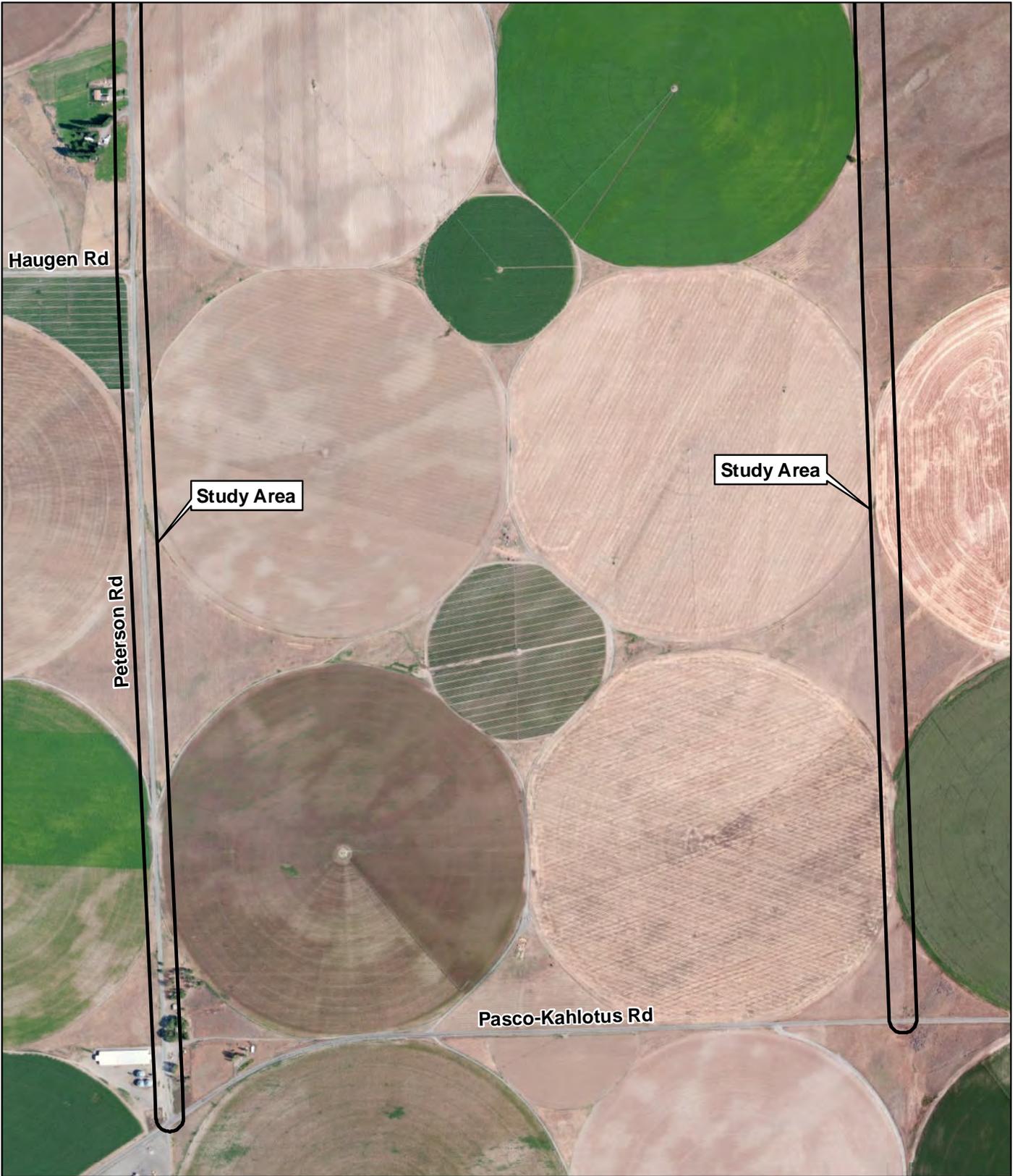
ESRI, ArcGIS Online, World Imagery. Microsoft. 2010. UC-G.

Natural Resources Conservation Service (NRCS). 2013. Soil Survey Geographic (SSURGO) database for Franklin County, Washington.

**Figure 3, Sheet 1**  
Soil Survey

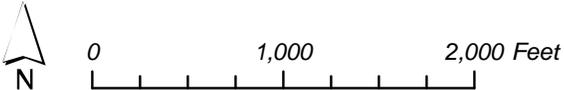


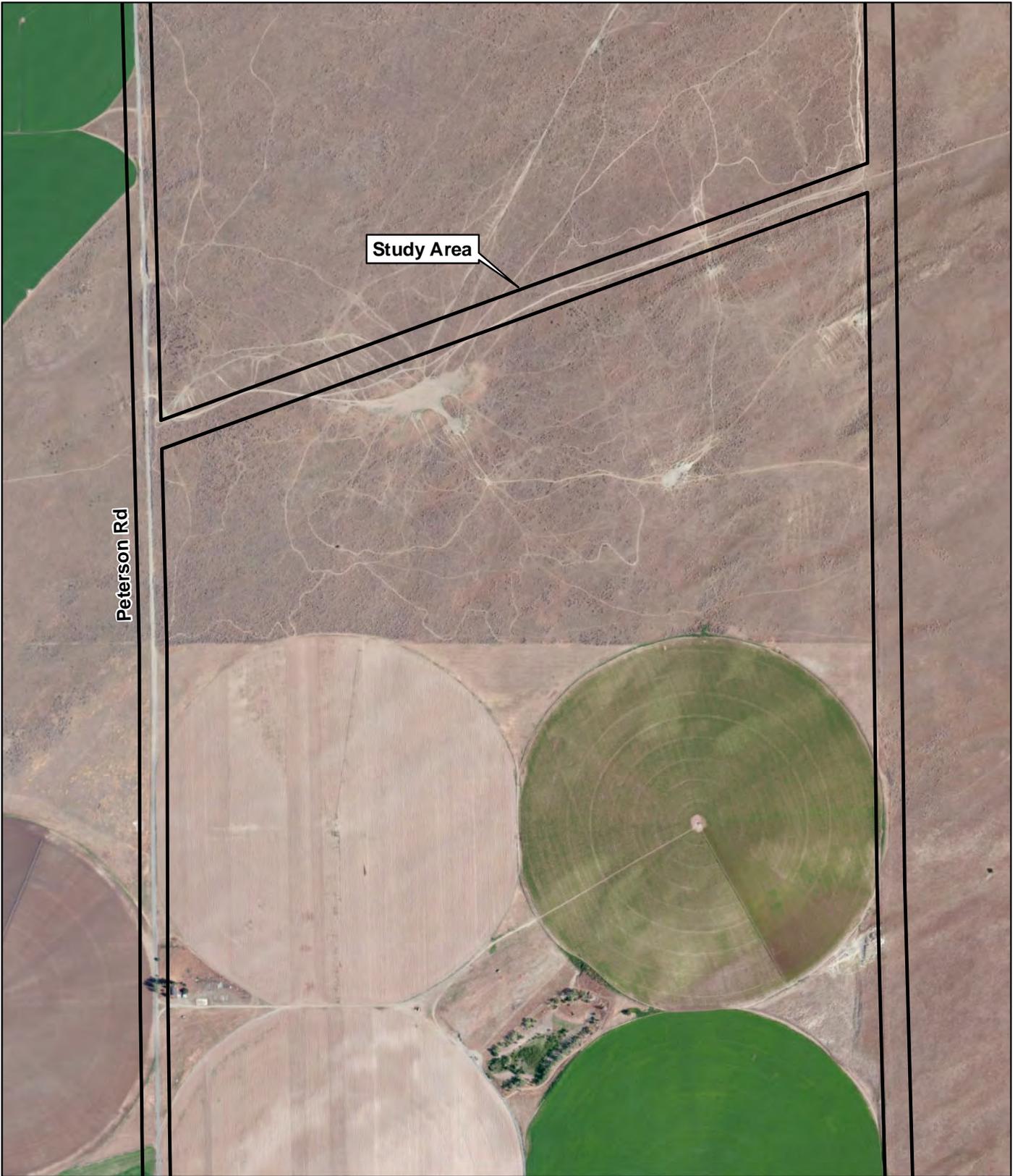




ESRI, ArcGIS Online, World Imagery. Microsoft. 2010. UC-G.  
Franklin County, Washington. 2014.

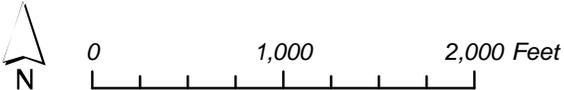
**Figure 4, Sheet 1**  
Aerial Photograph





ESRI, ArcGIS Online, World Imagery. Microsoft. 2010. UC-G.  
Franklin County, Washington. 2014.

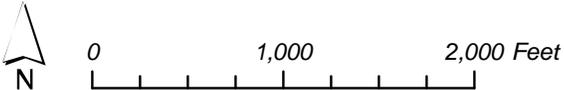
**Figure 4, Sheet 2**  
Aerial Photograph





ESRI, ArcGIS Online, World Imagery. Microsoft. 2010. UC-G.  
Franklin County, Washington. 2014.

**Figure 4, Sheet 3**  
*Aerial Photograph*





# BIOLOGICAL RESOURCES REPORT

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## Juniper Dunes Access Road Project

**Task Order No. DTFH7014F10003**  
**IDIQ Contract No. DTFH70-10-D-00019**  
**Project No. WA Franklin 2013(1)**

*Prepared for:*

**Federal Highway Administration**  
**Western Federal Lands Highway Division**  
610 East Fifth Street  
Vancouver, Washington



*Prepared by:*

**David Evans and Associates, Inc.**  
2100 SW River Parkway  
Portland, Oregon 97201



**August 15, 2014**



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## **1. INTRODUCTION**

The Western Federal Lands Highway Division (WFLHD) of the Federal Highway Administration (FHWA), in cooperation with Franklin County and the Bureau of Land Management (BLM), is constructing an approximately 4.2 to 5 mile road from Pasco-Kahlotus Road to the Juniper Dunes Wilderness and off-highway vehicle (OHV) areas (Figure 1, Appendix A) in Franklin County, Washington. The project would occur on private land and BLM land.

The area known as “Juniper Dunes” consists of three adjoining areas comprising a total of approximately 19,600 acres. Each area has different use regulations:

- Juniper Dunes Wilderness - The 7,100-acre wilderness area, designated in 1984, is fenced. Motorized and mechanized use (including bicycles and game carts) is strictly prohibited within the wilderness area.
- OHV "Open" Area - A 3,920-acre off-highway vehicle (OHV) area is designated as "Open" to OHV use. Cross-country travel is permissible throughout the "Open" area.
- ACEC - Lastly, the 8,620-acre Area of Critical Environmental Concern (ACEC) is designated for "Limited" OHV use. Under the "Limited" designation, travel is limited to designated routes - no off-route travel is allowed. However, no OHV routes have been designated in the ACEC. Therefore, OHV use is not allowed within this area.

This Biological Resources Report (BRR) was prepared to examine whether or not the Juniper Dunes Access Road Project (project), may affect federally listed, threatened, and endangered species or candidates for listing under the Endangered Species Act (ESA), as well as Washington State and BLM Special Status Species. This BRR evaluates potential impacts to these species from project implementation based on current habitat conditions and suitability for providing the life history requirements of these species.

### **1.1 PROJECT DESCRIPTION**

There are two alternatives to access the endpoint in the OHV area. Alternative 1 is an alignment along Peterson Road (a private road), starting at Pasco-Kahlotus Road.

Alternative 1 has three options, all beginning at the intersection of Pasco-Kahlotus Road and Peterson Road, and arriving at the same endpoint:

- Alternative 1, Option A travels north for approximately 4 miles and approximately east-north- east for 1 mile.
- Alternative 1, Option B travels north for approximately 3 miles, east for approximately 1 mile, and north for approximately 1.2 miles.
- Alternative 1, Option C travels north for approximately 3 miles, northeast for approximately 1 mile, and north for approximately 1.5 miles.

Alternative 2 lies along the section line one mile to the east of Peterson Road. The alignment would travel north from Pasco-Kahlotus Road approximately 4.2 miles, arriving at the same endpoint as Alternative 1 and associated optional alignments.

## 1.2 PROJECT ACTIONS

The work shall consist of clearing and grubbing, roadway excavation, embankment compaction, placement of drainage structures (if necessary), placement of crushed surfacing, and placement of a bituminous surface treatment (first mile of roadway only). It is anticipated that clearing and grubbing the construction limits will be accomplished with motor graders, bulldozers, and hauling equipment (e.g. dump trucks, paddle-wheel scraper, etc.)

Roadway excavation and embankment compaction is anticipated to be performed by scrapers, motor graders, bulldozers, rollers, and hauling equipment. Approximately 40,000 cubic yards of material is anticipated to be excavated and compacted. Drainage structures (culverts, catch basins, etc.) if required, will be placed by excavator or backhoe.

Crushed surfacing will be placed by dump truck and motor graders, and then compacted by vibratory drum rollers. Approximately 7,500 tons of crushed aggregate will be placed.

The bituminous surface treatment will be placed by oil distributor truck, gravel spreader, and pneumatic rollers. Approximately 65 tons of Catatonic Rapid Set oil and 550 tons of crushed screenings are anticipated to complete the bituminous surface.

The conceptual design information and preliminary drawings were not available prior to this report. Therefore, the following project assumptions were made:

- Construction is anticipated to start in fall 2016, and require about three months to complete.
- The cut and fill quantities and vegetation impacts required for the project have not been determined, but vegetation impacts have been preliminarily estimated, as described in Section 4.2.
- Stormwater runoff will infiltrate to adjacent, well-drained soils. No new stormwater facilities are planned.

## 1.3 MINIMIZATION MEASURES

Although project design is still in the preliminary stages, the project-related Best Management Practices (BMPs) shown in Table 1 are typical on this type of project.

**Table 1: Project Related BMPs Applicable to All Project Actions**

Project Related BMPs Applicable to All Project Actions	
1	All direct project-related impacts will occur within the study area.
2	Temporary staging and material storage areas will be located in previously disturbed areas that are immediately adjacent to the roadway alignment or other approved sites.
3	Only vegetation that is necessary for the project to be constructed will be removed.
4	Where practicable for soil stability, re-vegetation with a native seed mixture will be planted in areas disturbed by construction activities.
5	Vegetation clearing would occur outside the migratory bird treaty act (MBTA) nesting season (approximately May 15 to July 15 based on the local BLM representative-Lowe, pers. comm., 2014), or surveys will be conducted immediately prior to construction to ensure that nesting birds are not present.

## **2. METHODS**

Information on biological resources in the vicinity of the proposed project was gathered from existing documentation and references, coordination with state and federal agencies, and field surveys conducted by biologists.

### **2.1 RESEARCH AND COORDINATION**

The following resources were used to create a list of species with the potential to occur in or near the study area. Other studies reviewed to inform the BRR are referenced within the text of the document.

- Bureau of Land Management, Geographic Biotic Observations (GeoBOB) database (BLM, 2014)
- Interagency Special Status/Sensitive Species Program website (USFS and BLM 2014)
- US Fish and Wildlife Service (USFWS) Federally Listed Species for Franklin County (USFWS 2013)
- Washington State Species of Concern Lists (WDFW 2014)
- Washington Natural Heritage Program (WNHP) Priority Habitats and Species (PHS) database search results within two miles of the Juniper Dunes Access Road Project (WNHP 2014)
- Washington Natural Heritage Information System List of Known Occurrences of Rare Plants in Franklin County, Washington. March 2014.

#### **Personal Communications with Agency Personnel, June and July, 2014**

- Jason Lowe, Wildlife Biologist, Bureau of Land Management Spokane District Office, WA
- Kim Frymire, Botanist, Bureau of Land Management Washington Border Field Office, WA
- Jim Watson, Wildlife Research Scientist, Washington Dept. of Fish and Wildlife (WDFW), Concrete, WA
- Sara Gregory, Benton & Franklin County District Wildlife Biologist (WDFW), Pasco, WA
- Matthew Rasmussen, PE, County Engineer/Assistant Public Works Director, Franklin County, WA

### **2.2 FIELD SURVEYS**

Two David Evans and Associates, Inc. (DEA) biologists, familiar with the vegetation and wildlife of the region, conducted a reconnaissance level survey (site recon) to document habitat conditions within the site and vicinity on July 2 to 3, 2014. The study area extends 100 feet to either side of centerline for each alternative, as shown in Figure 1 and 2, Appendix A.

Where habitat was highly degraded (Alternative 1, Options A, B, and C) the entire study area was reviewed from a vehicle with spot-checks on foot. In less-disturbed habitat (Alternative 2) staff carefully traversed the entire study area on foot looking for special status plants, wildlife, and wildlife habitat using the intuitive controlled method. The site visits occurred during the flowering season for the species noted by BLM with potential to occur within the study area.

General habitat conditions were noted and representative photographs were taken, which are included in Appendix B.

Habitat boundaries were determined from direct observation aided by aerial photo interpretation. Habitat types are modified from those used in Wildlife-Habitat Relationships in Oregon and Washington (Johnson, D. H. and T. A. O'Neil, Oregon State University Press 2001). Given the reconnaissance nature of the site visits, habitat mapping was approximate, and the size of habitat polygons was maintained at approximately three to five acres. Therefore, patches of habitat less than three to five acres within a larger habitat polygon were not mapped separately. In many cases, patches of cheatgrass (*Bromus tectorum*), for example, were present within larger areas of native species, but these patches were not mapped unless larger.

Concurrent with the site recon, a reconnaissance level wetland field survey was conducted to identify any wetlands in the study area using the Level 2 Routine Delineation Method described in the U.S. Army Corps of Engineers (USACE) Wetlands Delineation Manual (Environmental Laboratory 1987) and further supported by the Arid West Regional Supplement (Supplement) to the Corps of Engineers Wetland Delineation Manual (USACE 2008). Since no aquatic resources or surface water connections to aquatic resources were found within the vicinity of the study area, aquatic species are not addressed in this document.

### **3. RESULTS**

#### **3.1 VEGETATION**

The project is located in the shrub-steppe lands of the interior Columbia Basin, an essentially treeless biome that covers much of the interior west between British Columbia and Mexico (Daubenmire, 1970). Elevations within the study area range from approximately 650 to 750 feet in elevation. Much of the study area is occupied by highly degraded habitats, including developed areas, agriculture areas, and ruderal areas that appear to have been cultivated at one time, and now are dominated completely by weeds. Habitat mapping shown in Figure 2 includes the following habitat types: Developed, Agricultural, Steppe, Shrub-Steppe, and Upland Trees. Developed areas include roads and residences. Agricultural areas include primarily center pivot agriculture planted with wheat, corn, or potatoes.

Outside of agricultural areas, native herbaceous cover consists primarily of needle and thread (*Hesperostipa comata*), with less cover by bluebunch wheatgrass (*Pseudoroegneria spicata*), Idaho fescue (*Festuca idahoensis*), and Sandberg's bluegrass (*Poa secunda*). Steppe habitat is dominated by the native and non-native species herbaceous shown in Table 2, and was very weedy in places.

Shrub-steppe habitat includes the herbaceous species found in steppe habitat, but with a shrub layer of at least 10% cover. In the study area, this habitat type is dominated primarily by big sagebrush (*Artemisia tridentata*) and cheatgrass. Trees (other than those present adjacent to residences) were small and very limited in distribution.

**Table 2: Dominant Species within the Study Area**

Native Shrubs		Abundance
<b>Big Sagebrush</b>	<i>Artemisia tridentata</i>	Dominant
<b>Gray Rabbitbrush</b>	<i>Ericameria nauseosa</i>	Common
<b>Antelope Bitterbrush</b>	<i>Purshia tridentata</i>	Common
Native Grasses and Herbs		Abundance
<b>Needle and Thread</b>	<i>Hesperostipa comata</i>	Dominant
<b>Common Yarrow</b>	<i>Achillea millefolium</i>	Abundant
<b>Yellow Bee Plant</b>	<i>Cleome lutea</i>	Abundant
<b>Indian Ricegrass</b>	<i>Achnatherum hymenoides</i>	Common
<b>Indian-Wheat</b>	<i>Plantago patagonica</i>	Common
<b>Bluebunch Wheatgrass</b>	<i>Pseudoroegneria spicata</i>	Uncommon
<b>Bristly Fiddleneck</b>	<i>Amsinckia tessellata</i>	Uncommon
Non-native and Invasive Species		Abundance
<b>Cheatgrass</b>	<i>Bromus tectorum</i>	Dominant
<b>Russian Thistle</b>	<i>Salsola kali</i>	Dominant
<b>Prickly Lettuce</b>	<i>Lactuca serriola</i>	Dominant
<b>Jim Hill Mustard</b>	<i>Sisymbrium altissimum</i>	Dominant
<b>Wheat</b>	<i>Triticum sp.</i>	Dominant
<b>Yellow Salsify</b>	<i>Tragopogon dubius</i>	Common
<b>Redstem Stork's Bill</b>	<i>Erodium cicutarium</i>	Common
<b>Rush Skeletonweed</b>	<i>Lygodesmia juncea</i>	Uncommon
<b>Field Bindweed</b>	<i>Convolvus arvensis</i>	Uncommon
<b>Scotch Thistle</b>	<i>Onopordum acanthium</i>	Uncommon
<b>Canada Thistle</b>	<i>Cirsium arvense</i>	Uncommon
<b>Russian Knapweed</b>	<i>Centaurea repens</i>	Uncommon

Since some areas dominated by native species were present, the relative presence of native herbaceous species within steppe and shrub-steppe habitat has been indicated by a habitat category number as shown in Figure 2; Appendix A. Table 3 provides an example of the approximate percent cover by natives and non-natives used to categorize these habitat categories. Category 5 habitat was present where agriculture, fire, or other disturbance has resulted in nearly 100% cover by weeds. Category 4 habitat contained approximately half native and non-native species, while Category 3 habitat approached 70% cover by natives. No Category 1 or 2 habitats were present within the study area.

**Table 3: Approximate Herbaceous Cover by Habitat Category**

Category	Percent Native	Percent Non-native and Invasive
1	>99	<1
2	90	10
3	70	30
4	50	50
5	<1	>99

Excluding agricultural and developed areas, Alternative 1 habitat was dominated primarily by cheatgrass and big sagebrush. Option A, B, and C contained similarly weedy habitat, as well as some cover by antelope bitterbrush and gray rabbitbrush. The only areas dominated by native species (Category 3 and 4) occurred within Alternative 2 south of the Option B alignment. In these areas, needle and thread was dominant in large patches, with or without cover by big sagebrush. Category 3 and 4 habitats were generally found east of the property boundary along Alternative 2, although in some places needle and thread and other patches of native habitat were present west of the property boundary. The fenceline between properties was often quite weedy due to windblown weeds gathering on the fence, but the approximate scale of the habitat mapping did not always allow for this to be reflected in detail.

### 3.2 GENERAL FIELD OBSERVATIONS

Appendix B includes representative photos taken during the site recon, and Appendix C summarizes the wildlife species observed during the site recon. A wide variety of raptors, migratory birds, and reptiles utilize the study area for forage and cover, and numerous ground-dwelling species would be expected to occur, although the time was not taken to identify burrows. In general, burrows of any size appeared to be somewhat uncommon within the study area, perhaps due to the sandy nature of the soil. This could potentially limit the presence of ground-dwelling species and their associates. Two or three badger burrows were observed along the fence line of Alternative 2, and were searched for presence of special status species, but none was found.

Since trees were very limited within the study area, tree-nesting species were also limited. However, a lone 20-foot-tall poplar (*Populus* sp.) occurred in the northern portion of Alternative 1, and contained an active Swainson's hawk nest. An 8-foot tall western juniper (*Juniperus occidentalis*) was present in the central portion of Alternative 2, but contained no nests. Three 15-30 foot tall elm trees (*Ulmus* sp.) were present in this area as well, approximately 10 feet west of the study area. They contained several active Bullock's oriole nests, and adults displayed territorial behavior. Finally, a 30-foot western juniper was present east of the Alternative 2 study area (hundreds of feet outside the study area), and contained what appeared to be active crow or raven nests. A pair of Swainson's hawks was observed soaring and calling in the area, and a pair of Swainson's hawks was also observed (the same pair or another pair) flying and vocalizing over the southern portion of Alternative 2. A pair of western kingbirds displaying territorial behavior was also encountered in this area, and a grasshopper sparrow was noted south of this area.

### 3.3 WILDLIFE AND PLANTS- FEDERAL SPECIES

Federally listed threatened and endangered species are those plant and animal species formally listed by the USFWS under authority of the ESA. No critical habitat has been identified within the study area.

Table 4 displays those endangered, threatened, proposed, and candidate species with the potential to occur in or near the study area that are listed as occurring in Franklin County, Washington (USFWS 2014).

**Table 4: Federal Threatened, Endangered, Proposed, and Candidate Species With the Potential to Occur In or Near the Study Area**

Common Name	Scientific Name	USFWS Status	Habitat Requirements *	Potential Occurrence in the Study Area?
Pygmy rabbit	<i>Brachylagus idahoensis</i>	Endangered	Dense stands of big sagebrush growing in deep loose soils.	None. Outside the current range of the species. No further assessment.
Washington ground squirrel	<i>Urocitellus washingtoni</i>	Candidate	Shrub-steppe habitat. Most abundant in areas of high grass cover, on deep soils with low clay content and high silt content.	Unlikely. Randomized surveys in the area in 2013 found none. See Section 3.3.2.

\* Source of Habitat Requirements : Natureserve 2014

The following section addresses the status, background, occurrence, potential effects, and recommended conservation measures for endangered, threatened, proposed and candidate species that may utilize the study area of the project. Potential effects include direct, indirect, and cumulative impacts from project actions. Recommended conservation measures are those measures in addition to those described in Table 1 that would identify avoidance and high concern areas, suggest construction schedules to avoid impacts and make recommendations to avoid or minimize potential effects to listed species as applicable.

#### 3.3.1 Federal Threatened, Endangered, or Proposed Species

No federally-listed threatened, endangered, or proposed species are likely to occur in the study area.

#### 3.3.2 Federal Candidate Species

##### 3.3.2.1 Washington ground squirrel

**Background Information:** Washington ground squirrels occupy shrub-steppe and native grassland habitats, especially on sites with deep silty loam soils, which may enhance burrow digging. Washington ground squirrels are only active for 4 to 5 months, spending the rest of the year hibernating in underground burrows. Hibernation generally lasts from late May to late June through mid-January to late February (WDFW 2012).

**Occurrence in Project Area:** Although the study area lies outside the current range of the species (WDFW 2012), according to WDFW (Lowe, pers. Comm., 2014), one old record of the species exists near the wilderness boundary northeast of the study area (date unknown). The species was not found during randomized surveys conducted in the area by WDFW in 2013 (Lowe, pers. Comm., 2014). DEA biologists have conducted extensive field surveys in shrub-steppe habitat, including surveys for Washington ground squirrel based on presence of scat, and no such sign was found within the study area during the site reconnaissance.

### 3.3.3 Federal Species of Concern

The USFWS maintains a list of Federal Species of Concern. USFWS species of concern do not warrant the same level of protection as threatened or endangered species. Table 5 displays the federal Species of Concern (SOC) with the potential to occur in or near the study area that are listed as occurring in Franklin County, Washington (USFWS 2014).

**Table 5: Federal Species of Concern With the Potential to Occur in or Near the Study Area**

Common Name	Scientific Name	USFWS Status	Habitat Requirements*	Potential Occurrence in the Study Area?
<b>Burrowing owl</b>	<i>Athene cunicularia</i>	SOC	Open grasslands typified by short vegetation and presence of fresh small mammal burrows.	May occur, although few small mammal burrows seen during site visits. See Section 3.3.3.1.
<b>Ferruginous hawk</b>	<i>Buteo regalis</i>	SOC	Shrub-steppe with trees for nesting	Seven records within two miles of the study area, but no current nesting known within 1.5 miles of the study area.
<b>Bald eagle</b>	<i>Haliaeetus leucocephalus</i>	SOC	Mature forest/snags within 1 mile of large bodies of water	Known to winter along Columbia River. May fly over, but no nesting or foraging present.
<b>Loggerhead shrike</b>	<i>Lanius ludovicianus</i>	SOC	Lowland communities of sagebrush shrub-steppe.	Likely to occur, but no records. See Section 3.3.3.3.
<b>Long-eared myotis</b>	<i>Myotis evotis</i>	SOC	Mostly forested areas, especially those with broken rock outcrops.	None. No forested areas near study area. No further assessment.
<b>Northern sagebrush lizard</b>	<i>Sceloporus graciosus</i>	SOC	Shrub-steppe habitats with open ground areas	Known to occur within the study area. See Section 3.3.3.4.
<b>Pallid Townsend's big-eared bat</b>	<i>Corynorhinus townsendii pallescens</i>	SOC	Shrub-steppe habitats.	Likely to occur due to presence of prey, but no records. See Section 3.3.3.5.
<b>Gray cryptantha</b>	<i>Cryptantha leucophaea</i>	SOC	Inland sand dunes steppe habitat	May occur, but no records. See Section 3.3.3.6.

\* Source of Habitat Requirements : Natureserve 2014

### 3.3.3.1 Burrowing owl

**Background Information:** The burrowing owl is a small owl of open grassland and shrub-steppe habitats. The primary habitat characteristics preferred by burrowing owls include a complex of available burrows, short and/or sparse vegetation that provides good visibility, and adequate populations of prey species. Agriculture and other development expose owls to pesticides and increase their vulnerability to predation (Larsen, et. al 2004). In addition, burrowing owls seem to be attracted to agriculture due to high prey abundance, but in agricultural areas natal recruitment and adult return rates were lower, suggesting that agricultural areas may constitute a population sink (WDFW 2012).

**Occurrence in Project Area:** According to WDFW (Gregory, pers. Comm., 2014), it is possible that they are present within the study area, and they are common in less disturbed habitat a few miles away, but none are known to occur in the study area, and no sign was found within the limited number of badger burrows during the site recon. An observation of a migratory individual occurred nearby a few years ago, but no breeding sightings have occurred, even during the ferruginous hawk surveys conducted in recent years (Lowe, pers. Comm., 2014). According to Larsen, et. al (2004), the friable nature of sandy soils results in relatively high rates of burrow failure due to erosion and trampling by livestock. Silt-loam soils are more structurally stable and less likely to fail than are soils with a sand component. Therefore, although the species can occur adjacent to human disturbance, the lack of silt loam soils and presence of intensive agriculture may limit the presence of the species within the study area.

### 3.3.3.2 Ferruginous hawk

**Background Information:** Landscapes comprised primarily of shrub-steppe, native prairie, haylands, and pasture are favored for nesting, while cropland is avoided (Larson et. al 2004). Most nests are found in areas with a high proportion of grassland, shrubland, and juniper forest and a low proportion of wheatland. Ferruginous hawk populations decline consistently once cultivated land exceeds 30% of the area. In Washington, ferruginous hawks nest on rock outcrops, steep low cliffs, ledges on hills, in some canyons, in isolated trees, and on powerline towers or other artificial structures (Larson et. al 2004). Ferruginous hawks are sensitive to disturbance; pairs may abandon nests even when mildly disturbed during nest building or incubation (March 1 through May 31).

**Occurrence in Project Area:** Seven records are mapped by the BLM GeoBOB database (2014) within two miles of the study area, including two within the central portion of Alternative 1 within highly degraded agricultural roadside areas. Surveys were conducted in the area by WDFW in 2013, but no formal report has been written, and no new information for the study area was currently available. However, according to unpublished BLM documentation for the Juniper Dunes Area of Critical Environmental Concern, Juniper Dunes (as defined in the introduction) is known to be home to a large proportion of Ferruginous hawks nesting within Washington (up to one-third). According to WDFW (Watson, pers. Comm., 2014), the species is known to occur and nest in the vicinity, and the closest known nest is 1.7 miles east of Alignment 2. Although the nest was last confirmed in 2002, WDFW stated that even if currently unoccupied, the historic nest location reflects habitat that the birds would potentially use in the future should the site be occupied. In addition, the WHNP database search revealed a historic

nest location within 0.5 miles east of Alternative 2 (WNHP 2014). This nest tree was investigated during the DEA site visits and was not found to contain an active raptor nest, and a pair of Swainson's hawks was observed soaring above it.

Mormon crickets (*Anabrus simplex*) are one of the most numerous prey items for Ferruginous hawk, and are abundant in the study area, especially along Alternative 2, which would indicate favorable conditions for the species to be present. However, during site visits conducted by DEA in 2014, the presence of nesting Swainson's hawk on the north end of Alternative 1, and observations of a pair of Swainson's hawks and red-tailed hawks along Alternative 2 make it less likely that Ferruginous hawks currently use the study area since competition with other species would be a factor.

### 3.3.3.3 Loggerhead shrike

**Background Information:** Loggerhead shrikes use open habitat during both breeding and non-breeding seasons, and in Washington are most abundant in lowland communities of sagebrush shrub-steppe. Specific factors limiting loggerhead shrikes are unknown. Suggested causes of population decline include loss of breeding habitat, low overwinter survival through loss of wintering areas, contamination by pesticides and high mortality due to vehicle collision (Larsen, et. al 2004).

**Occurrence in Project Area:** According to WDFW (Lowe, pers. Comm., 2014), presence of loggerhead shrike is likely within shrub-steppe habitat, although it is not specifically known to occur, and was not detected during site visits in 2014.

### 3.3.3.4 Northern Sagebrush lizard

**Background Information:** This species is found in shrub-steppe habitats with open ground areas, and is associated with sand dune habitat in Washington. Regularly perches on rocks and uses rodent burrows and shrubs for cover (Natureserve 2014).

**Occurrence in Project Area:** Based on surveys conducted by WDFW in and near the study area (WDFW 2011), the species is known to occur within the study area of Alternative 1 Option A, and is therefore likely to occur throughout the study area.

### 3.3.3.5 Pallid Townsend's big-eared bat

**Background Information:** This subspecies of the Townsend's big-eared bat uses shrub-steppe habitats. Mormon cricket, which is a primary prey species (Lowe, pers. Comm., 2014), is abundant along Alternative 2 and may be present throughout shrub-steppe habitats at different times.

**Occurrence in Project Area:** Although it is not specifically known to occur, presence of the pallid Townsend's big-eared bat is likely within shrub-steppe habitat in the study area due to presence of its prey, the Mormon cricket (Lowe, pers. Comm., 2014). Large numbers of these insects were present in sagebrush patches in the central portion of Alternative 2.

### 3.3.3.6 Gray cryptantha

**Background Information:** This species is basically restricted to sand dunes that have not been completely stabilized, and appears to be dependent on the strong winds of the region and the availability of open sand (Natureserve 2014). It is associated with rabbitbrush, bluebunch wheatgrass, cheatgrass, and sagebrush.

**Occurrence in Project Area:** Based on WDFW database results, the species occurs in dune habitats north and east of the study area (WNHP 2014). It was not observed during site visits, and no dune habitat exists within the study area, which may make presence of the species less likely than in occupied areas to the north of the study area.

## 3.4 SPECIAL STATUS WILDLIFE SPECIES

In addition to the Federally-listed species described above, Washington State maintains a list of Species of Concern which can be found on their website (WDFW 2012). These include native wildlife species that have need of protection and/or management to ensure their survival as free-ranging populations in Washington.

The BLM (in association with the United States Forest Service [USFS]) maintains lists of Sensitive Species and Strategic Species. Sensitive Species are species that could easily become endangered or extinct and should be managed such that activities on federal lands do not contribute to their listing. Strategic Species are species whose actual protection status is unknown due to data gaps or taxonomic uncertainties. Collectively, the BLM refers to both lists as Special Status Species.

The Interagency Special Status/Sensitive Species Program at the regional USFS headquarters office is responsible for updating the Strategic Species status as information about each species becomes known. The BLM has developed this approach to meet their obligation under the ESA as well as the National Forest Management Act. Since the project lies within the Spokane district, the Sensitive and Special Status Species list for the Spokane District was consulted (USFS and BLM. 2014) and cross-referenced with the WDFW list of Species of Concern (WDFW 2012). In addition, the BLM GeoBOB database was queried (BLM 2014).

Based on these results, a list of plant and animal species that could potentially occur within the project area, or be affected by the proposed project, was generated. Since no mesic habitats (which are required for the two invertebrates suspected or documented in the Spokane district) occur within the study area, and no fungi species are listed, only wildlife and plant species are addressed further in this document. BLM and State of Washington wildlife species with the potential to occur in or near the study area are provided in Table 6, and the code key is provided at the bottom of the table. Species that may be impacted by the project are discussed separately.

### **3.4.1 Long-billed curlew**

**Background Information:** The species nests on the ground, usually in flat area with short grass or bare ground, sometimes on more irregular terrain, often near rock or other conspicuous object (Natureserve 2014). The species nests between April and June, with only one brood per year.

**Occurrence in Project Area:** One record is mapped by the BLM GeoBOB database (2014) within two miles of the study area, approximately 1.5 miles east of the center of Alternative 2, and the species may occur within the study area, but was not detected during site visits in 2014.

### **3.4.2 Swainson's hawk**

**Background Information:** The species occurs in a variety of habitats, including shrub-steppe with scattered trees. Tolerates extensive cultivation in the nesting area, and readily nests in trees in shelterbelts and similar situations produced by humans (Natureserve, 2014).

**Occurrence in Project Area:** Two records are mapped by the BLM GeoBOB database (2014) within two miles of the study area. Both lie approximately 1.5 miles east of the center of Alternative 2. More importantly, an active Swainson's hawk nest was detected during the site visits in a lone 20 foot tall poplar in the northern portion of Alternative 1. A single hawk was sitting on the nest, which lies within 50 feet of the edge of the roadway and is easily distinguishable from the road. A pair of Swainson's hawks was also observed twice (the same pair or another pair) flying over the central and southern portion of Alternative 2.

### **3.4.3 Black-tailed jackrabbit and white-tailed jackrabbit**

**Background Information:** Both of these species are closely associated with shrub-steppe habitat,

**Occurrence in Project Area:** Although no sign was found during the site recon, these species may occur within the study area. There are documented occurrences northeast of the project.

### **3.4.4 Herpetiles**

Based on surveys conducted by WDFW in and near the study area (WDFW 2011), several state-listed species of herpetiles (in addition to sagebrush lizard) are known to occur in and near the study area in shrub-steppe habitat (see Table 6).

**Table 6: Special Status Wildlife Species Potentially Occurring in the Study Area**

Common Name	Scientific Name	Status <sup>1</sup>	Habitat Requirements	Potential Occurrence in the Study Area?	Potential Effects
<b>Birds</b>					
<b>Ash-throated flycatcher</b>	<i>Myiarchus cinerascens</i>	BLM, Smon	Trees for nesting	Trees very limited.	Unlikely.
<b>Bald eagle</b>	<i>Haliaeetus leucocephalus</i>	BLM, SS, Fco	Mature forest/snags within 1 mile of large bodies of water	May fly over, but no nesting or foraging present.	Unlikely.
<b>Bobolink</b>	<i>Dolichonyx oryzivorus</i>	BLM, Smon	Grasslands	Habitat not present.	None.
<b>Burrowing owl</b>	<i>Athene cunicularia</i>	BLM, Fco, Scan	Closely associated with burrows in grasslands, deserts and scrublands	Known to breed locally	Maybe. Discussed in Section 3.3.3.1.
<b>Ferruginous hawk</b>	<i>Buteo regalis</i>	BLM, Fco, ST	Shrub-steppe with trees for nesting	Known to breed near the study area	Maybe. Discussed in Section 3.3.3.2
<b>Golden eagle</b>	<i>Aquila chrysaetos</i>	Scan	Forages in many habitat types; needs cliffs for nesting	Unlikely. Rare visitor to study area	Unlikely.
<b>Grasshopper sparrow</b>	<i>Ammodramus savannarum</i>	Smon	Closely associated with grasslands, fields and pastures	Detected along Alternative 2.	Detected along Alternative 2.
<b>Gray flycatcher</b>	<i>Empidonax wrightii</i>	BLM, Smon	Shrub-steppe	Not known to occur, but may be present.	Unlikely.
<b>Loggerhead shrike</b>	<i>Lanius ludovicianus</i>	Fco, Scan	Closely associated with juniper woodlands and shrub-steppe	Likely to occur, but not known.	Maybe. Discussed in Section 3.3.3.3.
<b>Long-billed curlew</b>	<i>Numenius americanus</i>	BLM, Smon	Closely associated with grasslands and shrub-steppe where adjacent to wetland areas or irrigated fields	Likely to occur, but not known.	Maybe. Discussed in Section 3.4.1
<b>Merlin</b>	<i>Falco columbarius</i>	Scan	Forages widely in open habitats; nests in westside and eastside forests	Unlikely. Rare migrant.	Unlikely.
<b>Peregrine falcon</b>	<i>Falco peregrinus</i>	Fco, SS	Cliff nester; forages near large concentrations of prey birds	Unlikely. Rare visitor to study area	Unlikely.
<b>Prairie falcon</b>	<i>Falco mexicanus</i>	Smon	Closely associated with grasslands and shrub-steppe; needs cliffs and rock outcrops for nesting	Unlikely. Rare visitor to study area	Unlikely.
<b>Sage sparrow</b>	<i>Amphispiza belli</i>	Scan	Shrub-steppe obligate	Unlikely. Rare migrant	Unlikely.
<b>Sage thrasher</b>	<i>Oreoscoptes montanus</i>	Scan	Shrub-steppe obligate	Unlikely. Rare summer visitor	Unlikely.

Common Name	Scientific Name	Status <sup>1</sup>	Habitat Requirements	Potential Occurrence in the Study Area?	Potential Effects
<b>Swainson's hawk</b>	<i>Buteo swainsoni</i>	Smon	Grasslands, shrub-steppe, and juniper woodlands; nests in shrubs and trees.	Known to breed in study area	Maybe. Discussed in Section 3.4.2.
<b>Mammals</b>					
<b>Black-tailed jackrabbit</b>	<i>Lepus californicus</i>	BLM, Scan	Closely associated with shrub-steppe and desert scrublands	Known to occur to the NE, and may occur in study area	Maybe. Discussed in Section 3.4.3.
<b>Fringed myotis</b>	<i>Myotis thysanodes</i>	Fco, Smon	Requires caves, mines or rock crevices for roosting; forages over open water and fields	Not documented, but may occur	Unlikely.
<b>Long-eared myotis</b>	<i>Myotis evotis</i>	Fco, Smon	Uses caves, mines, hollow trees, loose bark or rock crevices for roosting	Not documented, but may occur	Unlikely.
<b>Long-legged myotis</b>	<i>Myotis volans</i>	Fco, Smon	Uses caves or mines as hibernacula; uses hollow trees, loose bark or rock crevices for roosting.	Not documented, but may occur	Unlikely.
<b>Northern grasshopper mouse</b>	<i>Onychomys leucogaster</i>	Smon	Closely associated with shrub-steppe	Known to occur to the NE, and may occur in study area	Maybe. Expected to move to adjacent suitable habitat.
<b>Ord's kangaroo rat</b>	<i>Dipodomys ordii</i>	Smon	Closely associated with shrub-steppe	Known to occur to the NE, and may occur in study area	Maybe. Expected to move to adjacent suitable habitat.
<b>Pallid bat</b>	<i>Antrozous pallidus</i>	Smon	Requires rock cliffs, caves or mines for breeding; closely associated with open water and wetlands for foraging	Not documented, but may occur	Unlikely.
<b>Small-footed myotis</b>	<i>Myotis ciliolabrum</i>	Fco, Smon	Requires cliffs, rimrock boulders or talus for breeding; closely associated with wetlands, open water and grasslands for foraging	Not documented, but may occur	Unlikely.
<b>Washington ground squirrel</b>	<i>Spermophilus washingtoni</i>	BLM, Fcan, Scan	Shrub-steppe obligate	Not documented, but may occur	Maybe. Discussed in Section 3.3.2.1.
<b>Western pipistrelle</b>	<i>Pipistrellus hesperus</i>	Smon	Requires cliffs, rimrock boulders or talus for breeding; closely associated with wetlands, open water and grasslands for foraging	Unlikely due to lack of habitat	Unlikely.
<b>White-tailed jackrabbit</b>	<i>Lepus townsendii</i>	BLM, Scan	Closely associated with native shrub-steppe and grasslands	Not documented, but may occur	Maybe. Discussed in Section 3.4.3.

Common Name	Scientific Name	Status <sup>1</sup>	Habitat Requirements	Potential Occurrence in the Study Area?	Potential Effects
<b>Herpetiles</b>					
<b>Night snake</b>	<i>Hypsiglena torquata</i>	Smon	Found under rocks and other objects in shrub-steppe and dry forests	Not documented, but may occur	Maybe. Discussed in Section 3.4.4.
<b>Pacific gopher snake</b>	<i>Pituophis catenifer catenifer</i>	Smon	Wide range of habitats, including shrub-steppe	Likely. Documented nearby.	Maybe. Discussed in Section 3.4.4.
<b>Racer</b>	<i>Coluber constrictor</i>	Smon	Found under rocks and other objects in shrub-steppe and dry forests	Likely. Documented nearby.	Maybe. Discussed in Section 3.4.4.
<sup>1</sup> Status codes:					
<p><b>Fcan = Federal Candidate; Fco = Federal Species of Concern;</b>  <b>SC = State Species of Concern; Scan = State Candidate; SE = State Endangered; Smon = State Monitor; SS = State Sensitive; ST = State Threatened;</b>  <b>BLM= BLM Sensitive or Strategic</b></p>					

### 3.5 BIRDS OF CONSERVATION CONCERN

All birds found on the most current USFWS list of Birds of Conservation Concern Great Basin Region (BCR 9) have already been covered under the previous sections (USFWS 2008). They include ferruginous hawk, long-billed curlew, and loggerhead shrike.

Although not listed by an agency, bank swallow nests were found in a cut bank near the center of Alternative 1, and swallows were seen using the nests during the site visits. These species would be protected by the MBTA, and road widening associated with Alternative 1 would impact these nests.

### 3.6 SPECIAL STATUS PLANT SPECIES

Of the BLM and Washington State special status plant species known to occur on the Spokane district, only gray cryptantha, which was discussed under listed species, was determined to be likely to be present within the study area (Frymire, pers. Comm., 2014). Based on habitat needs, five other plant species could potentially occur within the project area, and are discussed in Table 7.

**Table 7: Special Status Plant Species Potentially Occurring in the Study Area**

Common Name	Scientific Name	Status <sup>1</sup>	Habitat Requirements	Potential Occurrence in the Study Area?
Great Basin gilia	<i>Aliciella leptomeria</i>	SS	Open semiarid habitats with gravelly or sandy soils	Not detected, but may be present.
Snake River cryptantha	<i>Cryptantha spiculifera</i>	BLM, SS	Dry, open areas in stable soils in steppe habitat	Not detected, but may be present.
Desert dodder	<i>Cuscuta denticulata</i>	SS	Parasitic on sagebrush	Unlikely, but could be present in sagebrush habitats.
Dwarf evening-primrose	<i>Eremothera pygmaea</i>	BLM, SS	Sagebrush shrub-steppe, on unstable soils	Unlikely since unstable soils are limited, but could be present.
Piper's daisy	<i>Erigeron piperianus</i>	BLM, SS	Commonly found in virgin stands of big sagebrush/bluebunch wheatgrass	Unlikely since no such habitat is present, but could be present in sagebrush habitats.
<sup>1</sup> Status codes:				
SS = State Sensitive; BLM=Sensitive or Strategic				

BLM requested that the site visits also target two species that are not currently on the BLM special status species list, but may be present: yellow wild rye (*Elymus flavescens*), and prickly pear cactus (*Opuntia polyacantha*). Yellow wild rye was not detected, and no sand dunes were present within the study area, but prickly pear cactus was found on BLM land in four places along the Alternative 2 alignment, and BLM has been informed.

## **4. PROJECT EFFECTS**

### **4.1 PROJECT EFFECTS OVERVIEW**

#### **4.1.1 Project Direct Effects**

Direct effects to habitat and impacts to wildlife are discussed by species in the following sections. Direct effects are those effects caused directly by construction or operation of the proposed action. They include potential impacts to species using the immediate project footprint, as well as species using adjacent areas that may experience increased noise or pollution during construction. Direct impacts to wildlife habitat (vegetation) are discussed in Section 4.2.

#### **4.1.2 Project Indirect Effects**

Indirect effects occur separated from the proposed project by time or distance. These could include effects on future food resources and foraging areas, or long-term changes in increased human disturbance or changes to associated land use. In general, the project could generate long term changes to either human activity levels or land use in the action area because it is increasing roadway capacity and providing improved access to previously less accessible areas.

According to information provided by Franklin County and BLM for the 2013 Washington State Federal Lands Access Program Project Proposal, , the average daily traffic (ADT) is 28 and the peak season seasonal average daily traffic (SADT) is 65. The 20 year projection of ADT is 105 and SADT is 243. Therefore the increase in ADT as a result of the project is estimated by WFLHD to increase four-fold within 20 years, and the SADT to increase ten-fold within 20 years.

Indirect effects from increased traffic as a result of the project may slightly increase the number of collisions with wildlife, but would not be expected to create a barrier to wildlife movement because “At low traffic intensity (<2,500) the small proportion of fauna casualties and animals repelled causes limited impact on the proportion of animals successfully crossing a road barrier” (Forman et al. 2003). The increased ADT and SADT estimated by WFLHD would still remain below volumes that would be likely to make the new roadway impermeable to passage by any listed species addressed in this document. However, locating the road within currently un-roaded habitat (Alternative 2) would increase indirect impacts to wildlife that may currently be present in those areas.

#### **4.1.3 Project Cumulative Effects**

Cumulative effects are those effects of future state or private (non-federal) activities that are reasonably certain to occur within the action area of the federal action subject to ESA consultation (Federal Register 1986). According to the Franklin County Public Works Department (Rasmussen, pers. Comm., 2014), one other County project would occur in the vicinity, a road project improving Pasco-Kahlotus Road from the intersection with Peterson Road to three miles to the east. The project would occur within the next two years and would consist of three feet of additional shoulder width, re-surfacing, and safety improvements, including raising the roadway at the proposed intersection with Alternative 2 to improve sight line distance.

The County project would result in cumulative impacts to habitat in the area, but the existing Pasco-Kahlotus Road runs through almost entirely agricultural habitat (center pivot), roadside vegetation is almost entirely weedy, and traffic levels quite high. Therefore, it is believed that wildlife use within the habitat to be impacted is currently very low.

## 4.2 VEGETATION

Based on Franklin County design, the preliminary typical section includes the following measurements (and impact assumptions):

- Two 13-foot lanes (total of 26 feet)
- Two 4:1 slopes from road edge (total of 8 feet)
- One 2:1 ditch profile (total of 4 feet)

Therefore, total permanent impact would be 38 feet, plus 6 feet of temporary impact on either side for a total of 50 feet of impact, on average. The 12 feet of temporary impact would be re-seeded with native vegetation.

For the alignment outside Peterson Road, which includes portions of Alternative 1, Options A, B, and C, as well as all of Alternative 2, terrain is more varied (it has generally not been previously graded) and project design has not yet reached the point where cut and fill quantities can be calculated. Therefore it is assumed that cut and fill impacts would be greater outside of the Peterson Road prism. We conservatively estimated an average of at least 15 additional feet of temporary impact on either side of centerline in areas outside of the Peterson Road prism, for a total impact of 80 feet, on average (compared to 50 feet within the Peterson Road prism).

Impacts to habitat types from the various alternatives and options are shown in the tables provided in Appendix D, A summary of impacts to steppe and shrub-steppe habitat (permanent and temporary impacts combined) is provided in Table 7. As mentioned previously, Category 5 habitat is nearly 100% dominated by weeds. Impacts to agricultural and developed habitats are not included, which explains the lower acreage of impact for Alternative 1, Option A because Option A extends the greatest distance along Peterson Road. However, it should be noted that Alternative 1, Option A passes by the active Swainson's hawk nest discussed previously.

**Table 8: Habitat Impacts Summary by Category for Steppe and Shrub-Steppe Habitats (acres)**

Alignment	Category 3	Category 4	Category 5	Total
Alternative 1, Option A	--	--	18.3	18.3
Alternative 1, Option B	2.3	1.9	11.6	26.2
Alternative 1, Option C	5.0	1.9	8.4	27.9
Alternative 2	17.4	5.0	14.2	36.6

Note: See Appendix D for temporary and permanent impact numbers by Alternative

**Recommended Conservation Measures:** As described in Table 1, in addition to other BMPs for construction, re-vegetation with a native seed mixture will be planted in areas disturbed by construction activities. The following native seed mix has been provided by BLM for use in the project.

**Table 9: USFS/BLM Approved Reclamation Seed Mix**

Species Scientific Name	Common Name	Seeding Rate (lb PLS/acre)
<i>Achillea millefolium</i>	Yarrow	0.10
<i>Pseudoroegneria spicata</i>	Bluebunch wheatgrass	6.00
<i>Lupinus sericeus</i>	Silky lupine	0.50
<i>Hesperostipa comata</i>	Needle-and-thread	3.00
<i>Poa secunda</i>	Sandberg's bluegrass	3.00
<i>Elymus elymoides</i>	Bottlebrush squirrel-tail	2.00
<i>Elymus lanceolatus</i>	Thickspike wheatgrass	3.00
<b>Total Seed in PLS/Acre</b>		<b>17.60</b>

Note: All biotypes of species used must be adapted to <8" precipitation zone.

Seeding will be completed at the appropriate time of year as advised by qualified personnel. The individual species and application rates have been selected to promote optimum seed germination and plant growth. Changes and/or adjustments to the seed mix and/or application rate may need to be made based on local conditions.

### 4.3 FEDERAL SPECIES

This section provides a preliminary determination of effect and recommended conservation measures for federally sensitive species that may be impacted by the project.

#### 4.3.1 Federal Threatened, Endangered, or Proposed Species

As discussed previously, no federally-listed threatened, endangered, or proposed species are likely to occur in or near the study area. Since no unique habitats or federally-listed species are known to occur, it does not appear that vegetation removal for the project would result in destruction of unique habitats or in habitat loss for federally threatened or endangered species.

#### 4.3.2 Federal Candidate Species

Although it is not known to occur within the vicinity, the project may reduce habitat available for one candidate species, the Washington ground squirrel.

##### 4.3.2.1 Washington ground squirrel

**Preliminary Determination of Effect:** The probability of occurrence for Washington ground squirrel in the study area is low since it lies on the edge of the species predicted range, WDFW surveys for the squirrels nearby were negative, and no sightings of the species by BLM biologists doing various other springtime surveys have been made (Lowe, pers. Comm., 2014). However, if the species were present, construction could result in mortality or loss of fitness for individuals present within the study area. Indirect impacts are unlikely since the species can inhabit areas of human disturbance, unless the new roadway would make it more likely that further development would occur in adjacent areas.

**Recommended Conservation Measures:** None because they are not expected to occur in the project area. The project is on the edge of the species predicted range, WDFW surveys for the squirrels nearby were negative, and no sightings of the species by BLM biologists doing various other springtime surveys have been made.

### **4.3.3 Federal Species of Concern**

The project may reduce habitat available for several federal species of concern that include or may include the study area and vicinity in their territories. The species discussed below may be displaced by noise and visual disturbances caused by construction, but are expected to move to adjacent suitable habitat. Overall, potential for project related injury, mortality, and habitat loss to these species is not expected to lead to future listing under the ESA.

Variations in impacts by alignment (shown in Table 8), would result in greater disturbance for certain alignments, which would result in greater impacts to potential habitat, but would not be expected to increase the overall disturbance to federally listed species, unless they were found to occur within the study area or vicinity.

For birds, FHWA will clear vegetation outside of the MBTA nesting season or perform surveys in advance of construction to ensure that nesting birds are not present. If necessary, FHWA will coordinate with Animal and Plant Health Inspection Service for nest relocation.

#### **4.3.3.1 Burrowing owl**

**Preliminary Determination of Effect:** The probability of occurrence is moderate since they are known to occur a few miles away, although only sandy soil types are mapped within the study area, which according to Larson et. al (2004) could decrease probability of occurrence. If individuals were present within or adjacent to the study area, construction could result in mortality or loss of fitness.

**Recommended Conservation Measures:** Vegetation clearing would occur outside the burrowing owl nesting season (approximately March through September), or surveys will be conducted immediately prior to construction to ensure that nesting birds are not present. If these measures cause disruptions to the construction schedule, more specific avoidance measures will be developed in coordination with BLM and WDFW.

#### **4.3.3.2 Ferruginous hawk**

**Preliminary Determination of Effect:** The probability of occurrence for ferruginous hawks in the study area is currently relatively low due to presence of other raptor species, but the species is known to use the study area and vicinity. This species does not appear to be currently using the study area for nesting. Surveys to determine presence or absence have been conducted by BLM each year since 2008, and the nearest occupied nest is 1.7 miles to the east. While a historic nest tree is present within 1/8 of a mile of Alternative 2, it has not been occupied recently. Increased public access from the project could further decrease the likelihood of use by the species by making conditions more favorable to less-sensitive raptors.

**Recommended Conservation Measures:** If active nests are found in the vicinity, the following WDFW guidelines should be followed: According to Larson et. al (2004) brief human access and intermittent ground-based activities should be avoided within a distance of 820 feet of nests during the hawks' most sensitive period (March 1 to May 31). Prolonged activities should be avoided, and noisy, prolonged activities should not occur, within 0.6 miles of nests during the breeding season (March 1 to August 15). Construction or other developments near occupied nests should be delayed until after the young have dispersed, which generally occurs about a month after fledging.

If these guidelines cause disruptions to the construction schedule, more specific avoidance measures will be developed in coordination with BLM and WDFW. Such measures could include hazing during nest building to preclude use of the nearby historic nest tree, shortening the breeding season restriction to June 30 if appropriate, monitoring to see if the hawks are affected by construction noise, muffling construction equipment, or other measures deemed appropriate.

In addition, WDFW suggested minimizing human access directly to the nest area 1.7 miles east of Alternative 2 to reduce the opportunity for ORVs or hikers to disturb the historic nest in that location. A two-track road connects directly to the study area (Watson, pers. Comm., 2014), and should be fenced, gated, or otherwise excluded from access from the new roadway.

#### **4.3.3.3 Loggerhead shrike**

**Preliminary Determination of Effect:** The probability of occurrence is moderate since they are known to occur a few miles away. If the species is present, construction could result in loss of fitness for species present adjacent to the study area. However, since the project would observe the MBTA and vegetation would be cleared outside the MBTA nesting season, direct mortality would be unlikely.

**Recommended Conservation Measures:** Vegetation clearing would occur outside the migratory bird nesting season (approximately May 15 to July 15), or surveys will be conducted immediately prior to construction to ensure that nesting birds are not present.

#### **4.3.3.4 Pallid Townsend's big-eared bat**

**Preliminary Determination of Effect:** If the species is present, construction could result in loss of fitness for species present adjacent to the study area. Mortality would be unlikely since the species would be expected to move to adjacent suitable habitat.

**Recommended Conservation Measures:** No conservation measures are recommended.

#### **4.3.3.5 Northern Sagebrush lizard**

**Preliminary Determination of Effect:** Construction could result in mortality or loss of fitness for species present or adjacent to the study area. Mortality would be somewhat unlikely since the species would be expected to move to adjacent suitable habitat.

**Recommended Conservation Measures:** None because this species is highly mobile and can therefore escape surface-disturbing activities. Additionally, the species is not especially rare and is well distributed in the region (Lowe, pers. Comm., 2014).

#### **4.3.3.6 Gray cryptantha**

**Preliminary Determination of Effect:** No effect based on lack of sand dune habitat within the study area.

### **4.3.4 Special Status Species**

Vegetation present in the project area makes up a very small portion of the potential habitat adjacent to the construction site. Birds, including those in Table 6 with the potential to occur, may be displaced from the project area by noise and visual disturbances caused by construction, but are expected to move to adjacent suitable habitat.

Similar to the effects discussion for listed species, potential for project related injury, mortality, and habitat loss to Special Status species is not expected to lead to future listing of these species under the ESA. Species with special considerations are discussed below.

#### **4.3.4.1 Long-billed curlew**

**Preliminary Determination of Effect:** The probability of occurrence is relatively high given documented presence near the study area, but if construction is timed to avoid the nesting season for the species, impacts can likely be avoided.

**Recommended Conservation Measures:** Vegetation clearing would occur outside the migratory bird nesting season (approximately May 15 to July 15), or surveys will be conducted immediately prior to construction to ensure that nesting birds are not present.

#### **4.3.4.2 Swainson's Hawk**

**Preliminary Determination of Effect:** Although the species can adapt to some degree to cultivation and other forms of human disturbance, road construction within sight of an active nest would likely cause disturbance.

**Recommended Conservation Measures:** Vegetation clearing would occur outside the migratory bird nesting season (approximately May 15 to July 15), or surveys will be conducted immediately prior to construction to ensure that nesting birds are not present.

#### **4.3.5 Mammals**

Special status mammals, including those in Table 5 with the potential to occur, may use the project area as dispersal and feeding habitat. Bats and jackrabbits are primarily active at night and are unlikely to be disturbed by daytime construction unless they are roosting or denning nearby. Habitat in the project site is not essential or unique habitat for bats or jackrabbits and they would be expected to move to adjacent suitable habitat; therefore the project impacts are not likely to lead to future listing of these species under the ESA, and no further conservation measures are recommended.

#### **4.3.6 Herpetiles**

Vegetation present in the project area is not essential or unique for herpetiles, and impacts from this project are not expected to lead to the future listing under the ESA. If trapping and translocation is conducted for the northern sagebrush lizard, these species should be translocated to the extent possible as well.

#### **4.3.7 Plants**

Based on preliminary design and impact assumptions described previously, the project could directly affect a maximum of 36.6 acres of undeveloped vegetation (Alternative 2). While no special status plants species were detected during the field survey, undetected plant individuals could still occur in the project area. Alternative 2 would likely result in mortality to the prickly pear cactus populations found in the area, however they are not currently listed by BLM. The loss of individual plants may affect the local population of that particular species but overall the project is not expected to result in the listing of any special status plant species under the ESA.

## **5. REFERENCES**

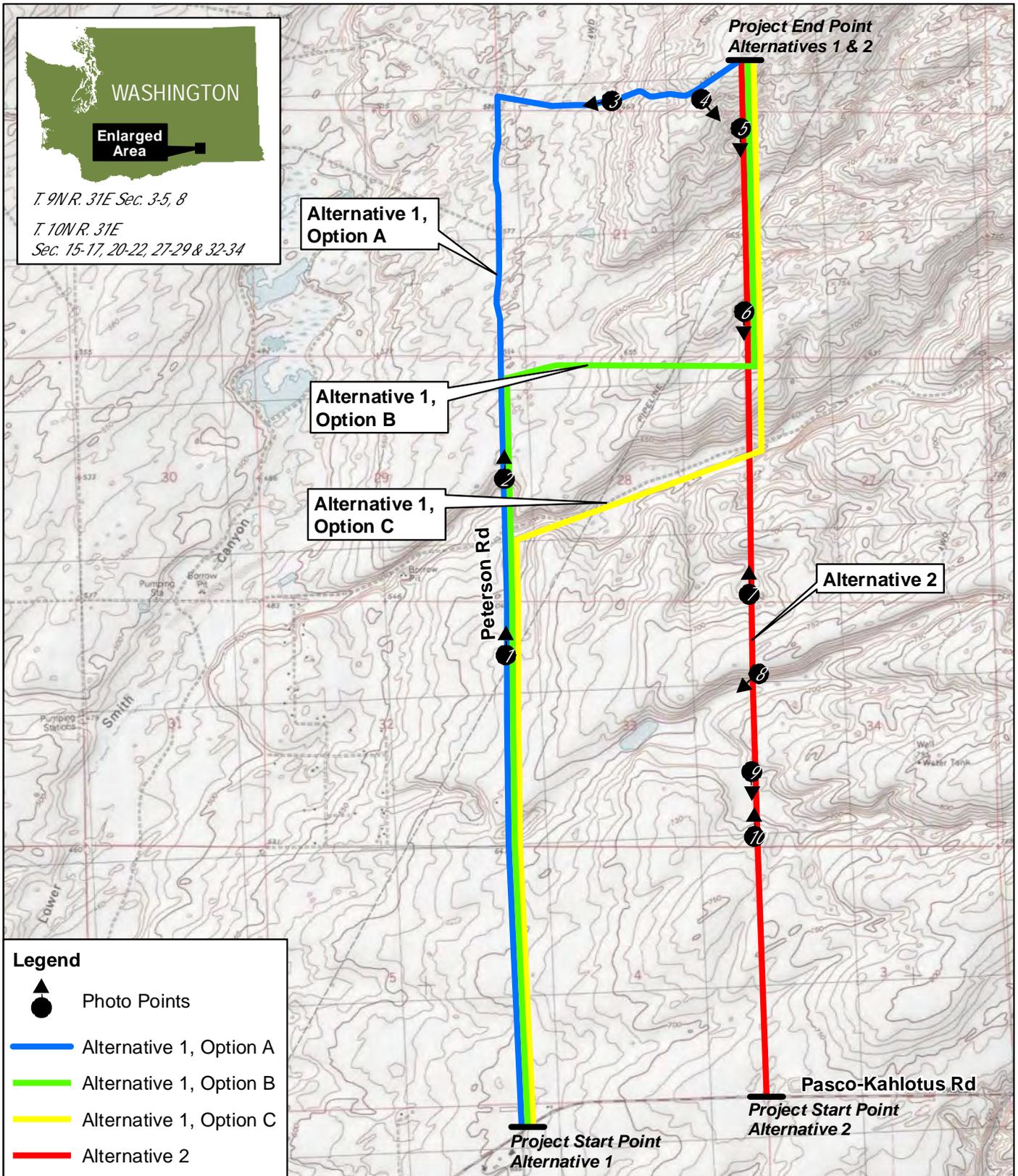
- Daubenmire, Rexford. 1970. Steppe Vegetation of Washington. Wash. Agr. Expt. Sta. Tech. Bull. 62, Washington State University, Pullman, WA. 131 p.
- Federal Register. 1986. Interagency cooperation- Endangered Species Act of 1973, as amended. Volume 51. No 106. Final Rule. pp. 19957-19963.
- Forman et al. 2003. Road Ecology: Science and Solutions. Island Press. 481 pp.
- Franklin, J.F., and C.T. Dyrness. 1973. Natural Vegetation of Oregon and Washington. U.S.D.A. Forest Service General Technical Report PNW-8.
- Larsen, E., J. M. Azerrad, N. Nordstrom, editors. 2004. Management recommendations for Washington's priority species, Volume IV: Birds. Washington Department of Fish and Wildlife, Olympia, Washington, USA.
- Natureserve. 2014. NatureServe Explorer: An online encyclopedia of life. Version 7.0. NatureServe, Arlington, VA. U.S.A. Available on-line: [www.explorer.natureserve.org](http://www.explorer.natureserve.org).
- US Fish and Wildlife Service (USFWS) 2013. Federally Listed Species for Franklin County, Washington, as prepared by the USFWS (Revised September 3, 2013). Available on-line: <http://www.fws.gov/wafwo/speciesmap/Franklin.pdf>
- US Forest Service and BLM. 2014. Interagency Special Status/Sensitive Species Program website. Available on-line: [www.fs.fed.us/r6/sfpnw/issssp/agency-policy/](http://www.fs.fed.us/r6/sfpnw/issssp/agency-policy/).
- Washington Department of Fish and Wildlife. 2014. Washington State Species of Concern Lists. Available on-line: <http://wdfw.wa.gov/conservation/endangered/status/SE/>
- Washington Department of Fish and Wildlife. 2012. Threatened and Endangered Wildlife in Washington: 2011 Annual Report. Endangered Species Section, Wildlife Program. Washington Department of Fish and Wildlife, Olympia. 180 pp.
- Washington Department of Fish and Wildlife. 2011. Summary of Reptile Surveys on BLM Public Lands in Yakima, Franklin, and Lincoln Counties. Lisa A. Hallock, January 2011.
- Washington Department of Fish and Wildlife. 2008. Priority Habitat and Species List. Olympia, Washington. 177 pp. Available online: [www.wdfw.wa.gov/publications/00165/wdfw00165.pdf](http://www.wdfw.wa.gov/publications/00165/wdfw00165.pdf)
- Washington Natural Heritage Information System. 2014. List of Known Occurrences of Rare Plants in Franklin County, Washington. March 2014. Available on-line: [www1.dnr.wa.gov/nhp/refdesk/lists/plantsxco/franklin.html](http://www1.dnr.wa.gov/nhp/refdesk/lists/plantsxco/franklin.html)

## **6. APPENDICES**



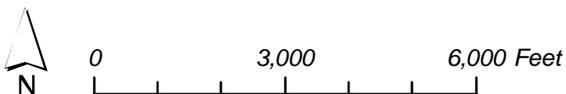
## ***APPENDIX A –FIGURES***



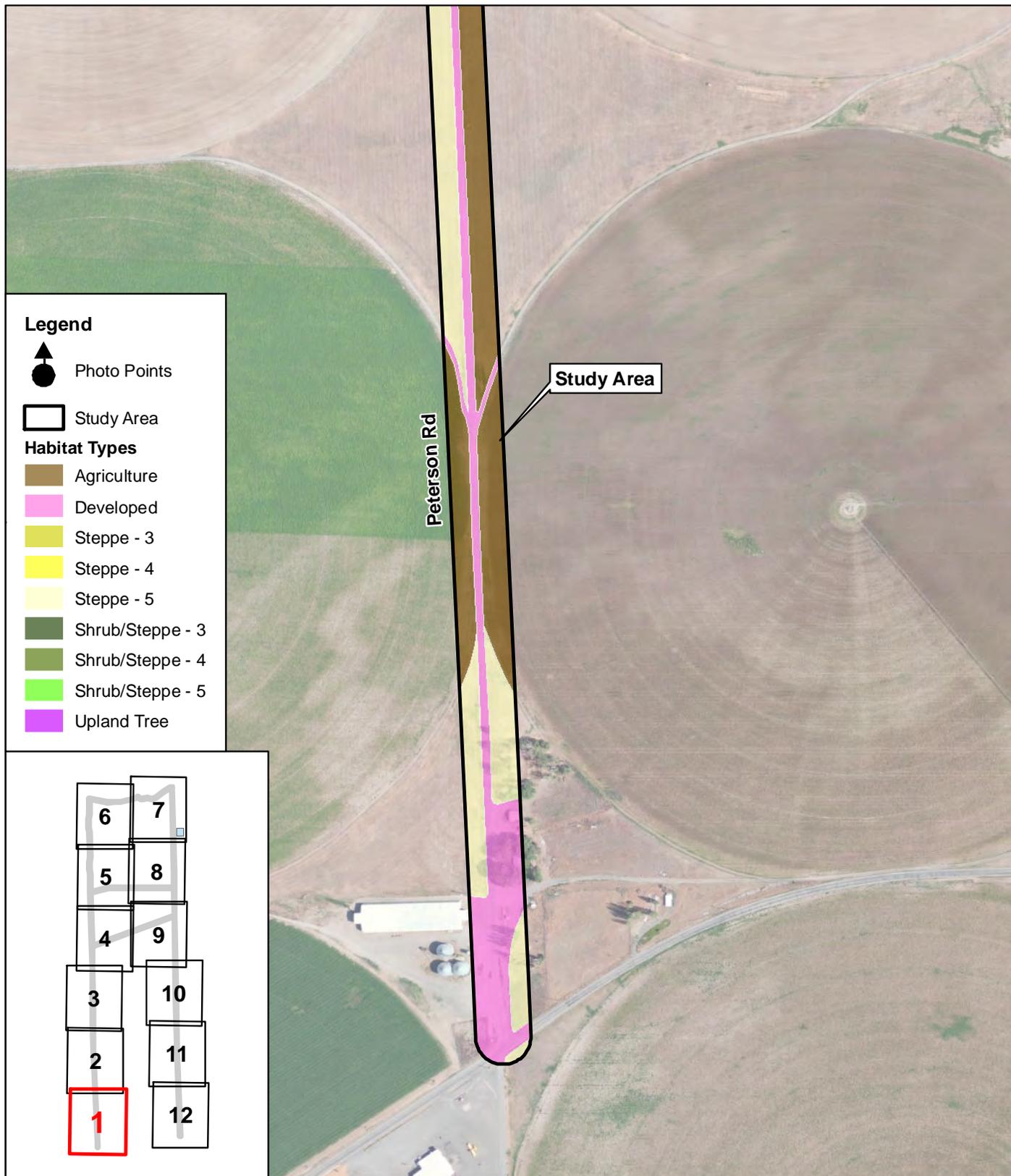


ESRI, ArcGIS Online, USA Topographic Maps. 30x60 GRID. 1980. Walla Walla, Washington; 1978. Richland, Washington.

**Figure 1**  
Vicinity

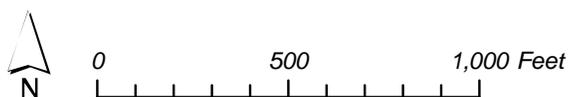


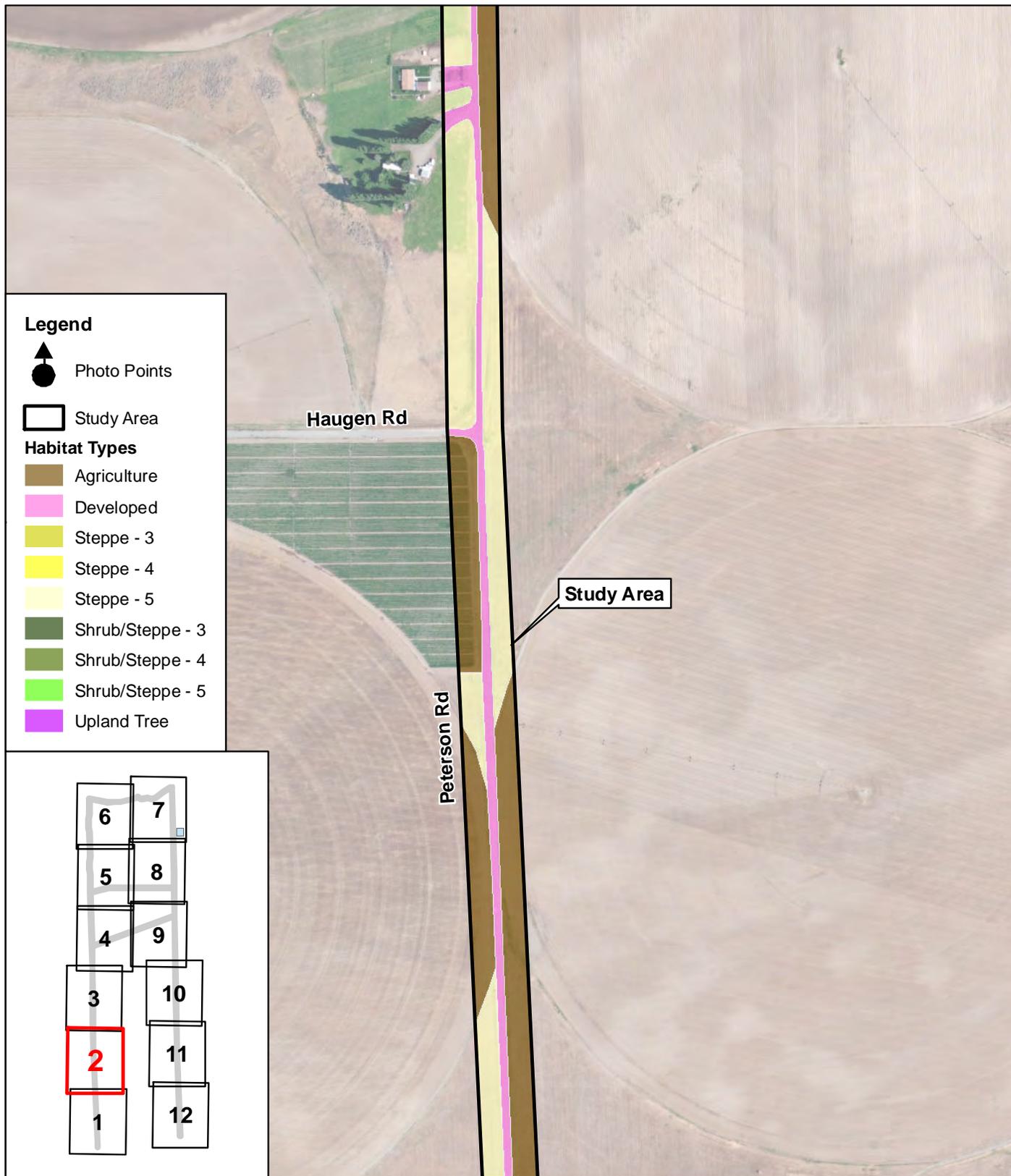




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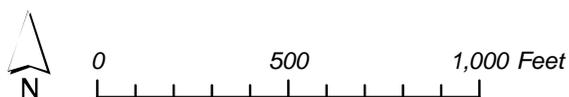
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Habitat Mapping

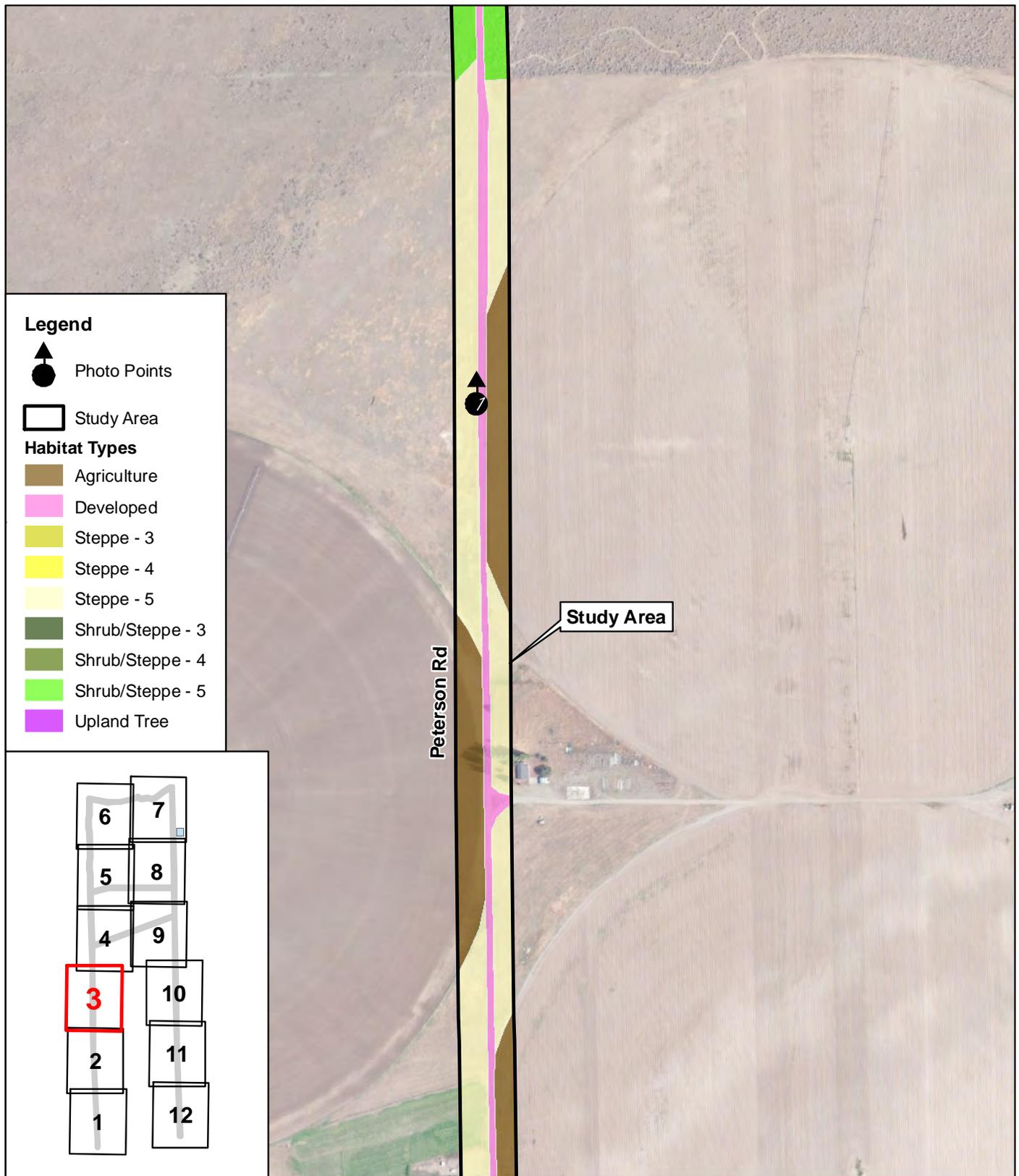




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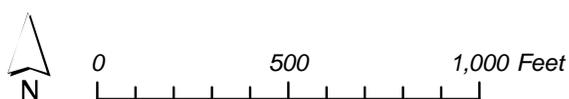
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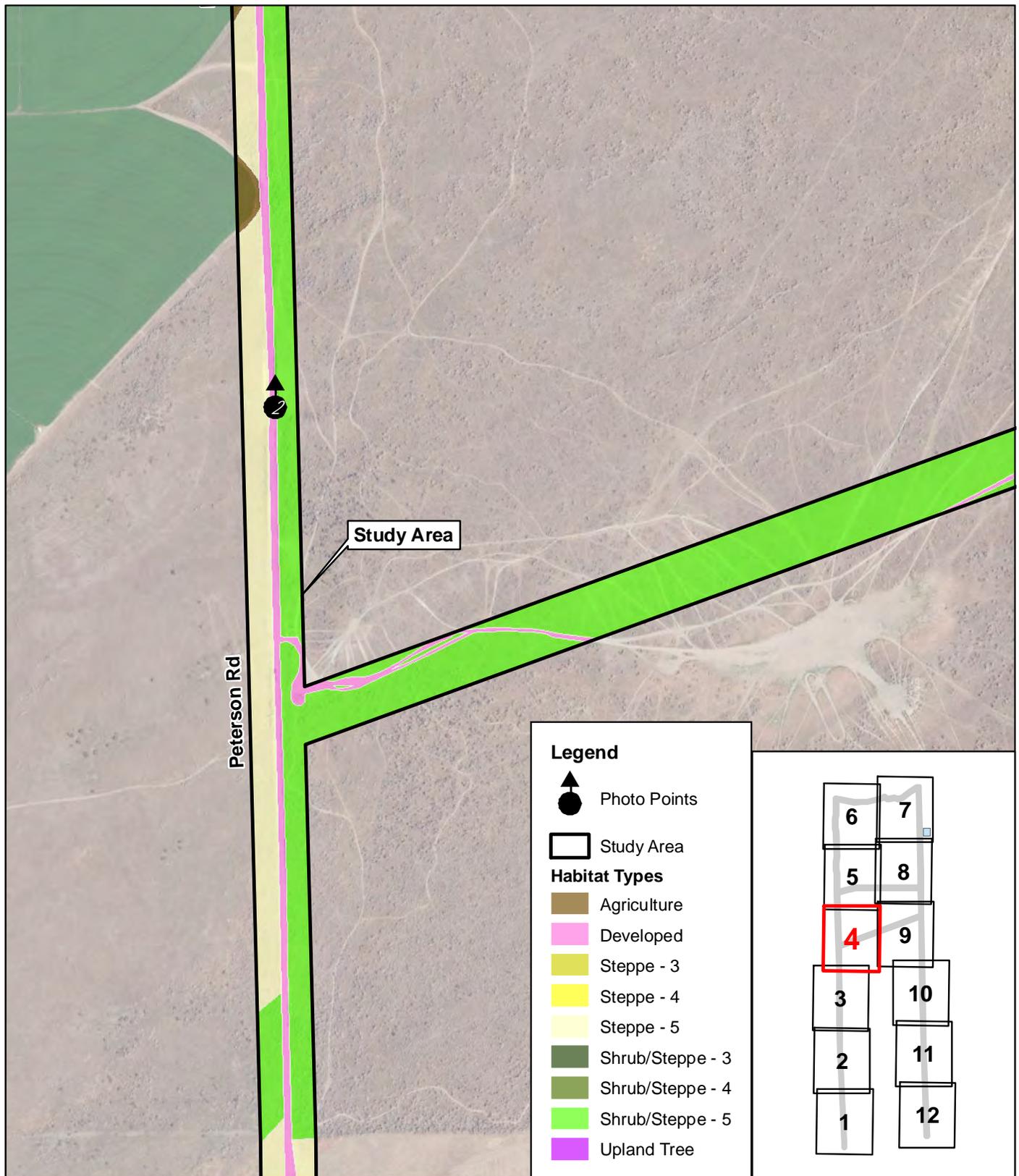




ESRI, ArcGIS Online, World Imagery. Microsoft. 2010. UC-G.

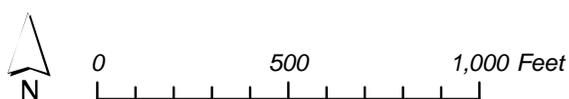
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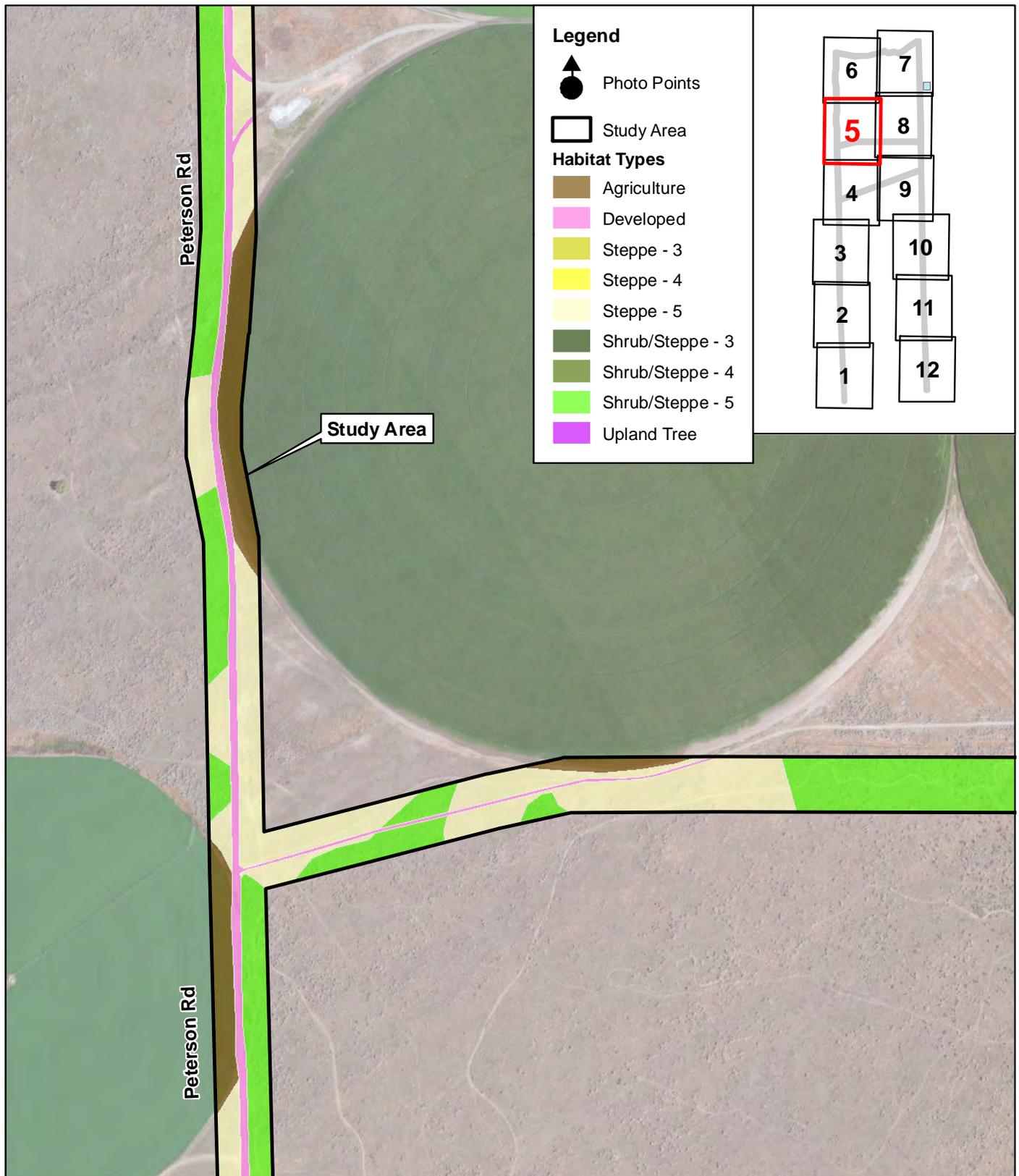




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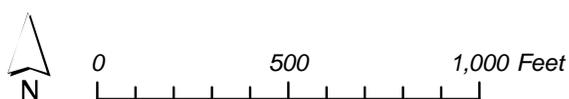
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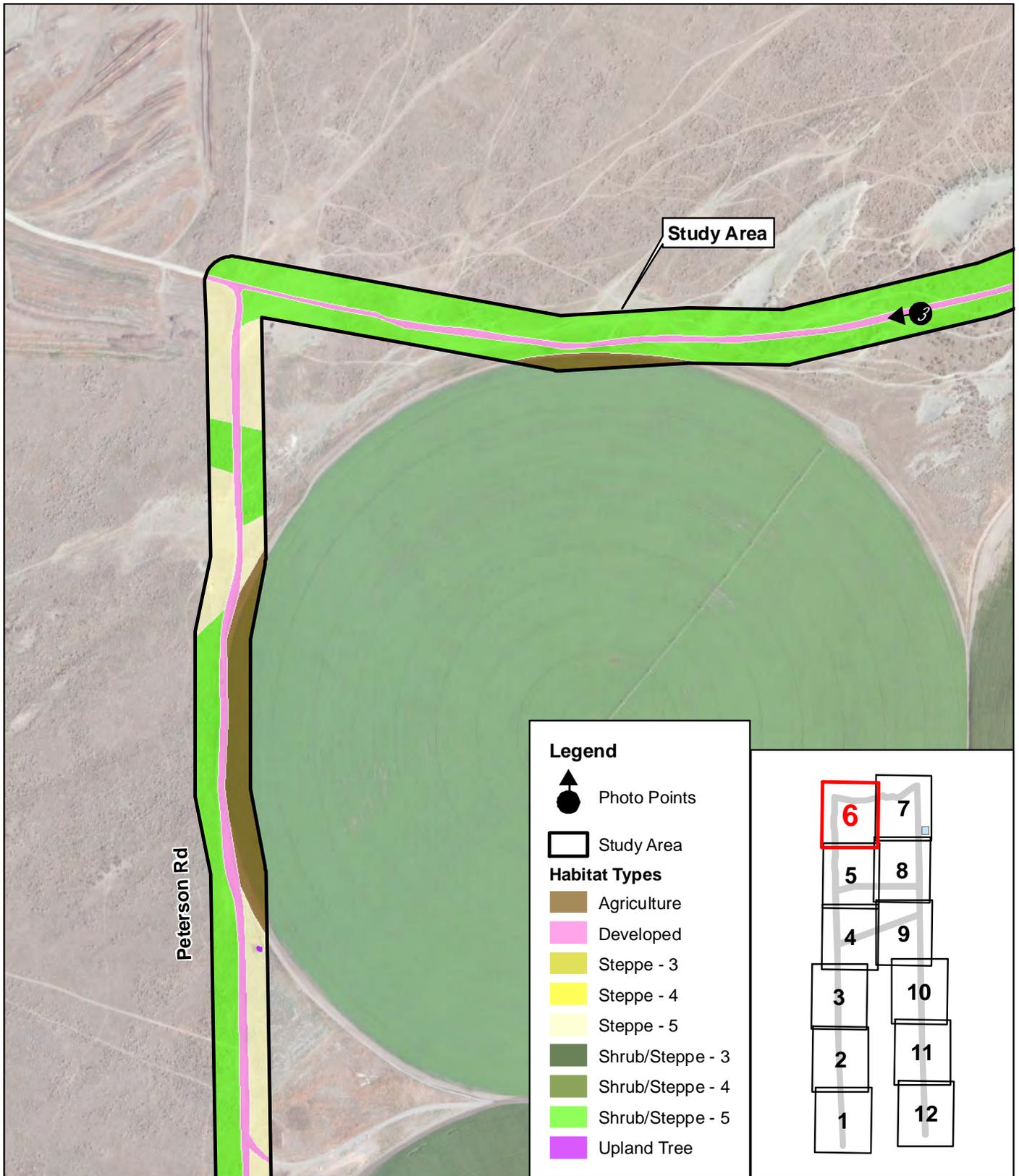




ESRI, ArcGIS Online, World Imagery. Microsoft. 2010. UC-G.

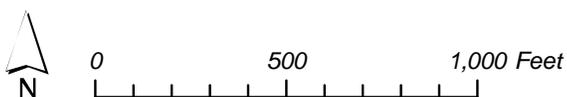
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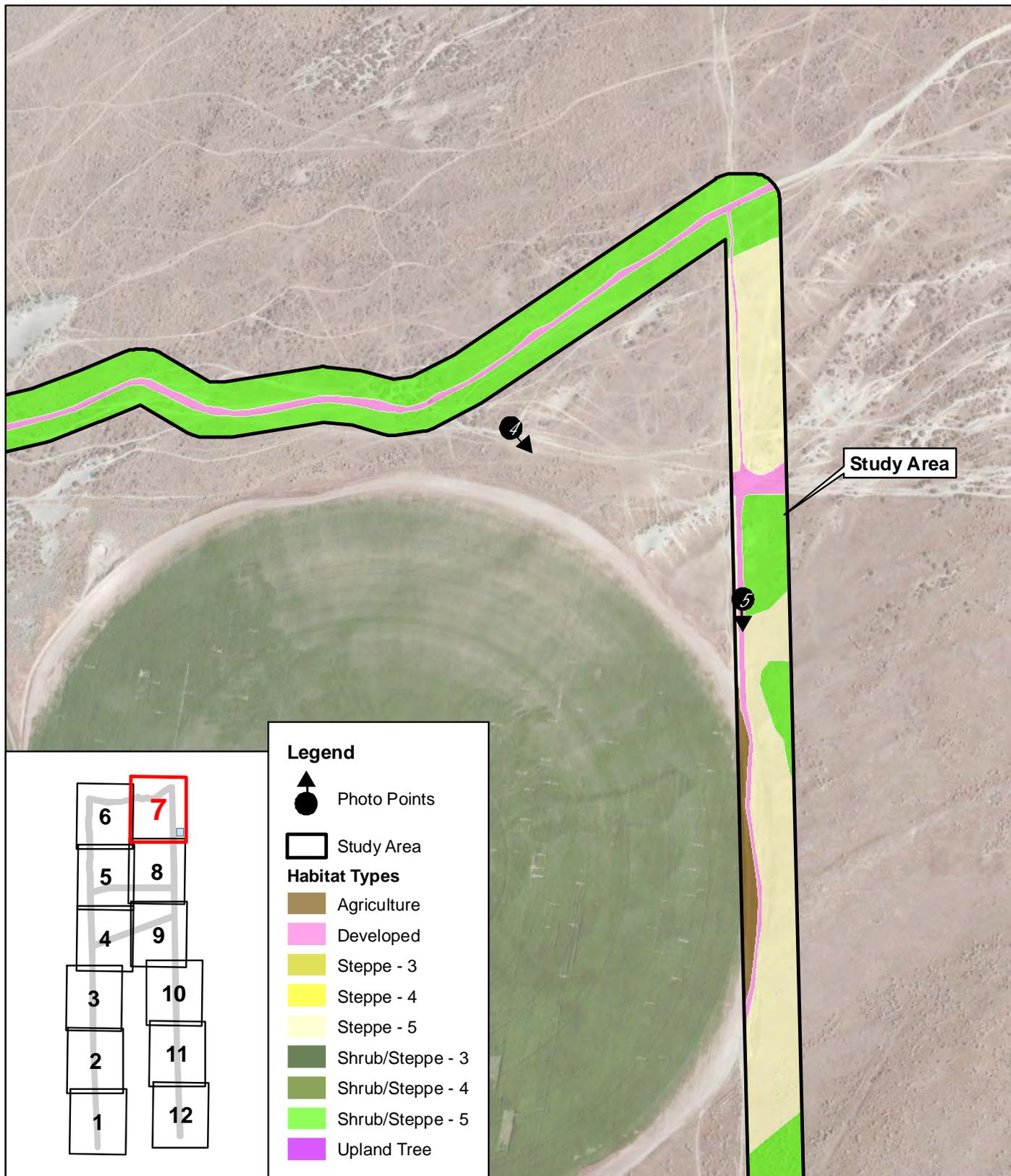




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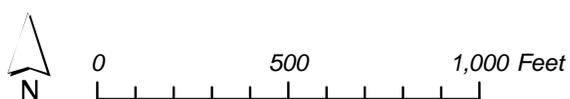
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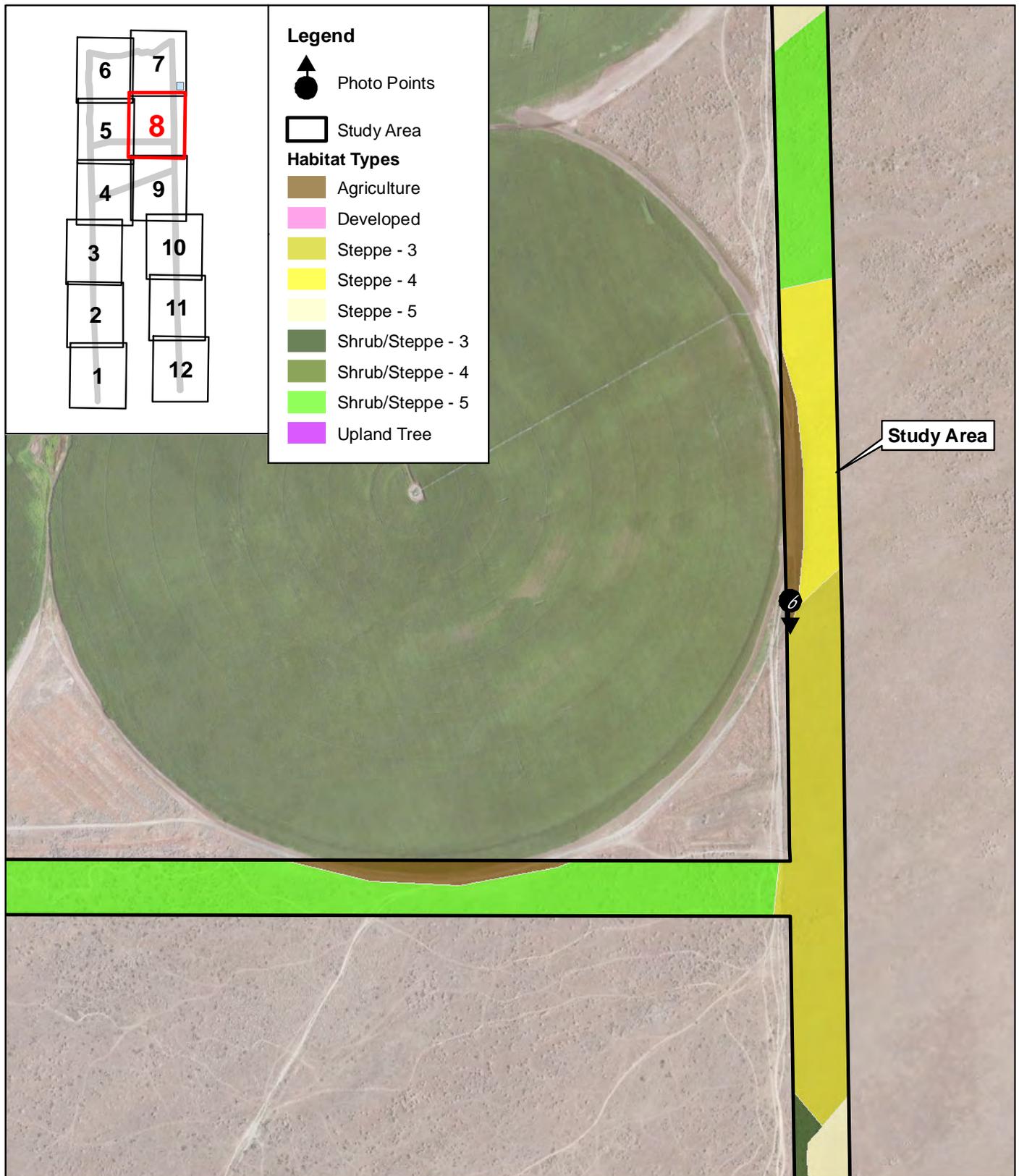




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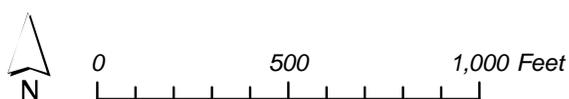
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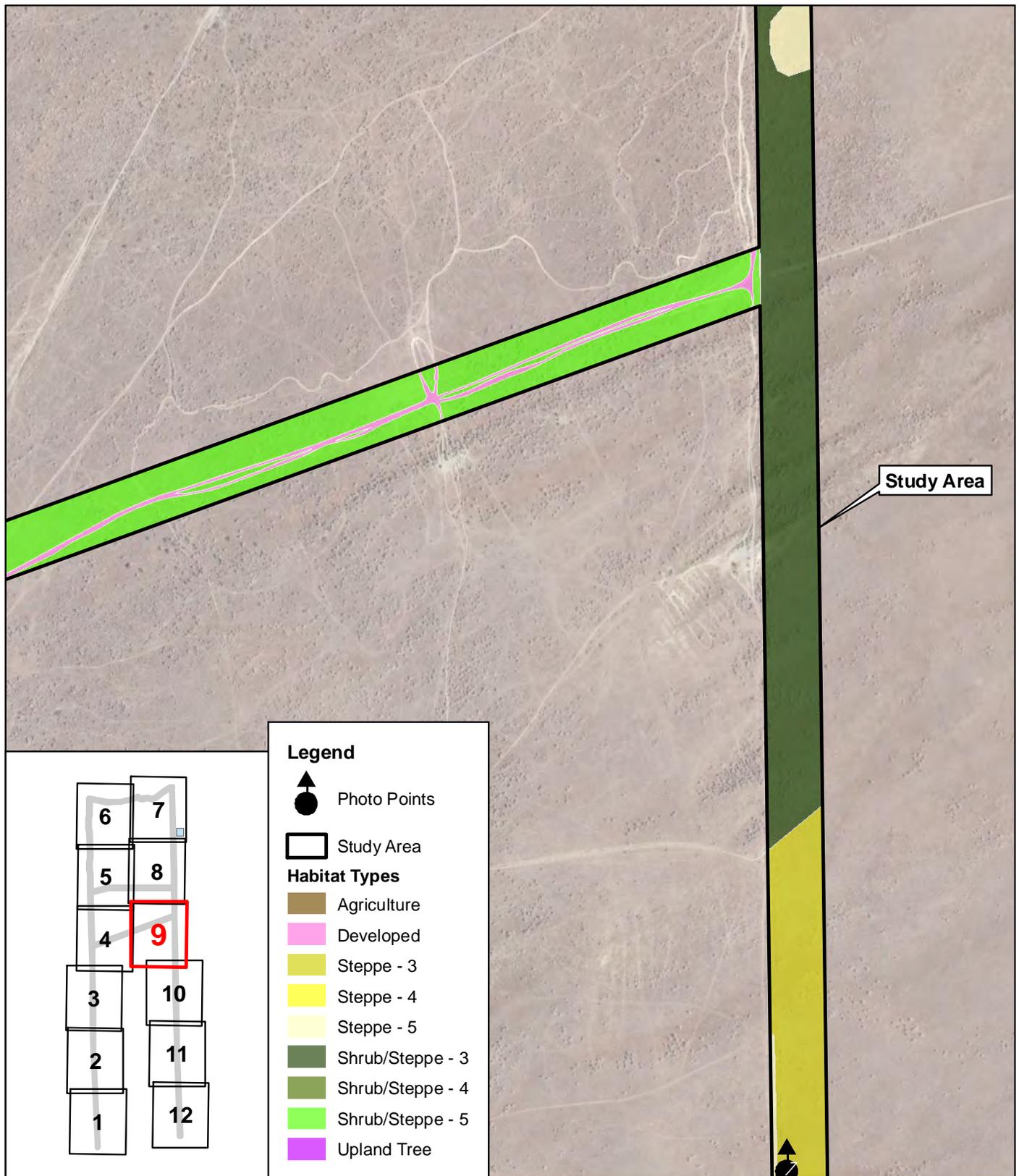




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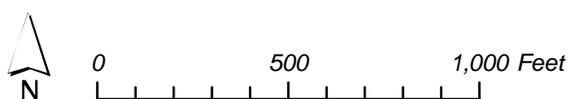
**Figure 2, Sheet 8**  
Habitat Mapping

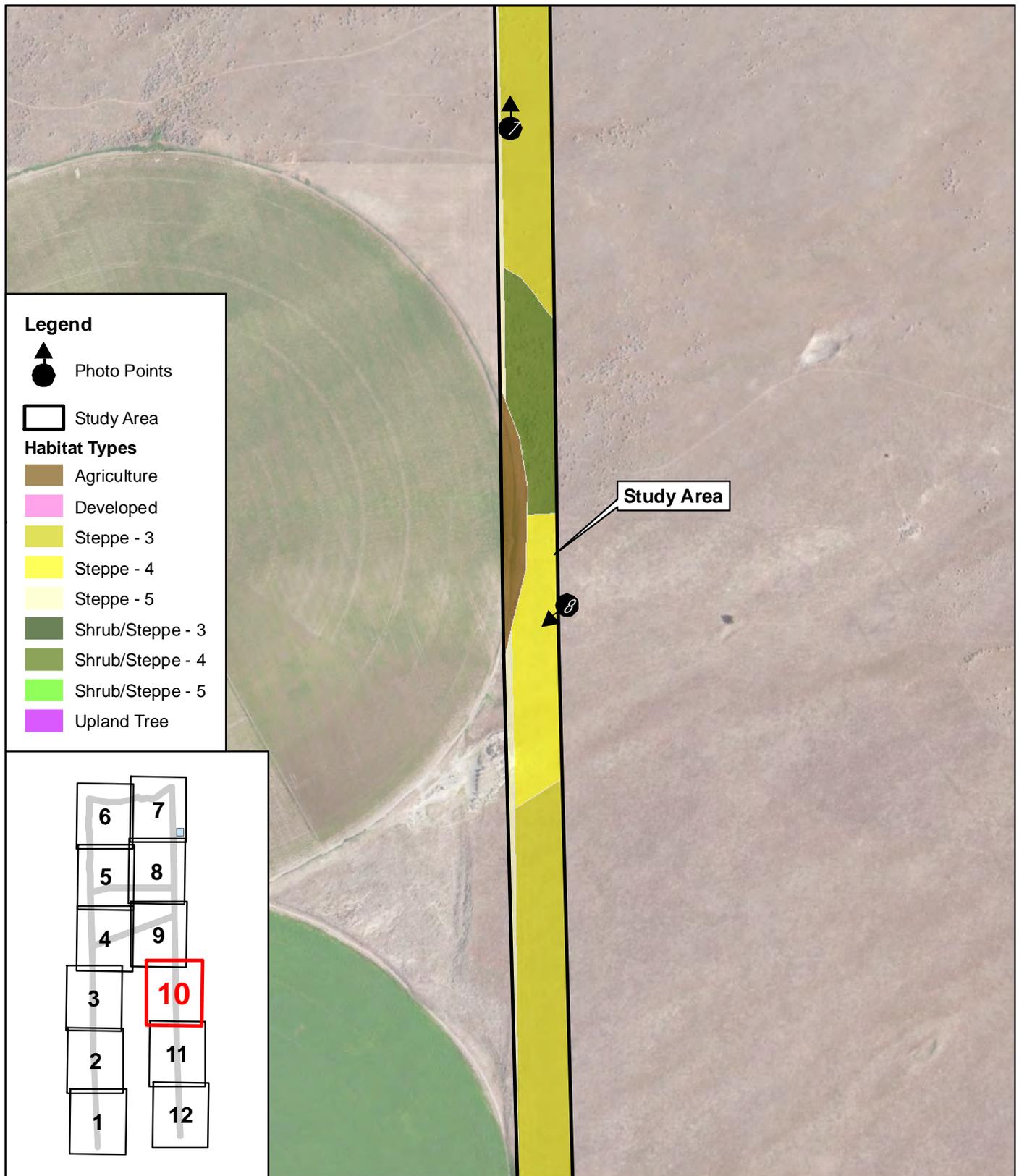




ESRI, ArcGIS Online, World Imagery. Microsoft. 2010. UC-G.

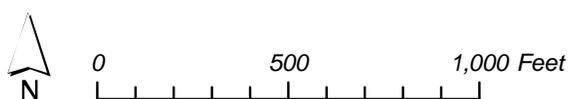
**Figure 2, Sheet 9**  
Habitat Mapping

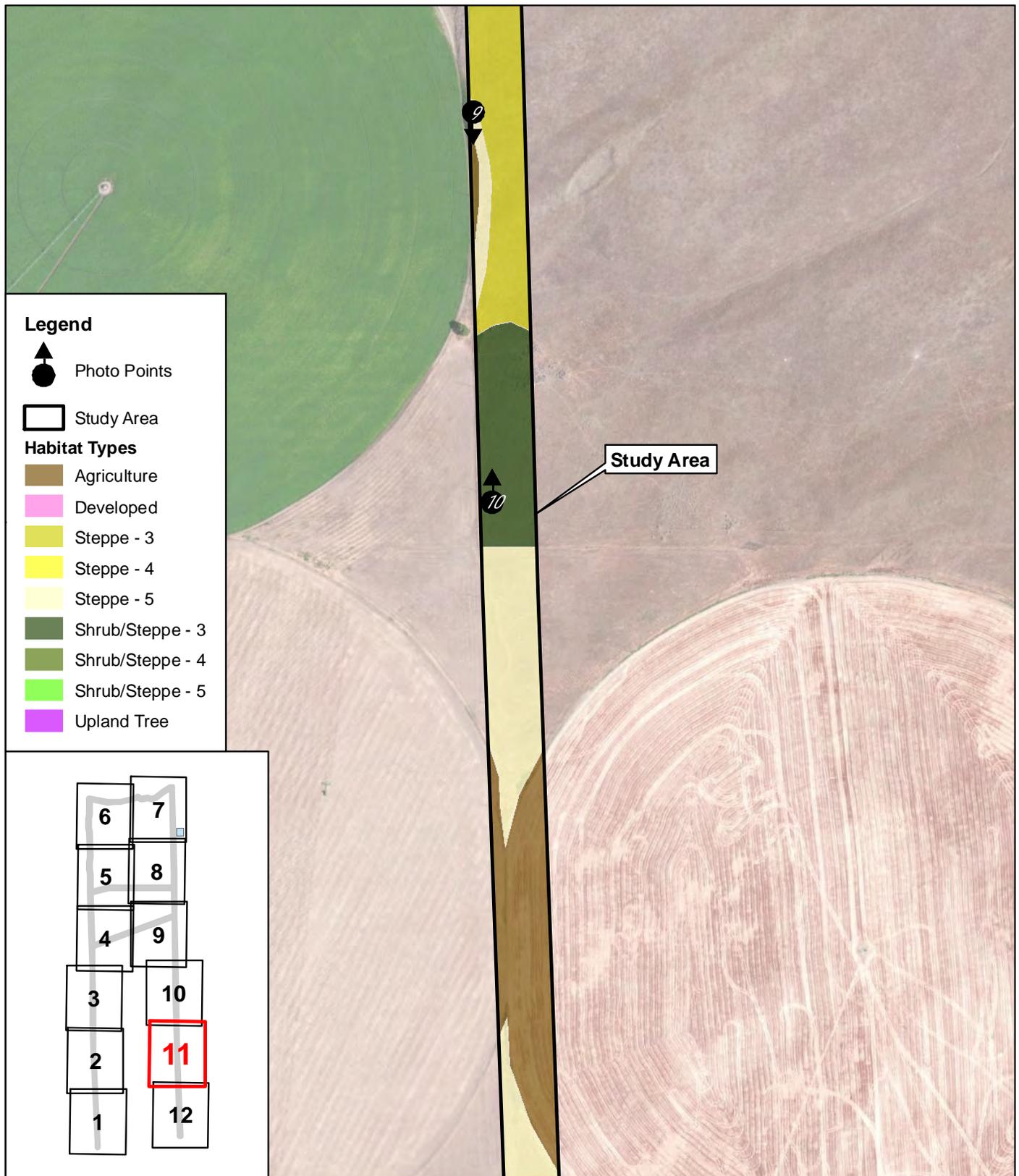




ESRI, ArcGIS Online, World Imagery. Microsoft. 2010. UC-G.

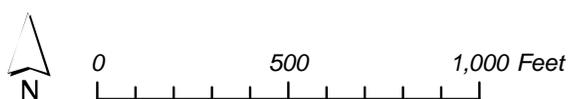
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Habitat Mapping

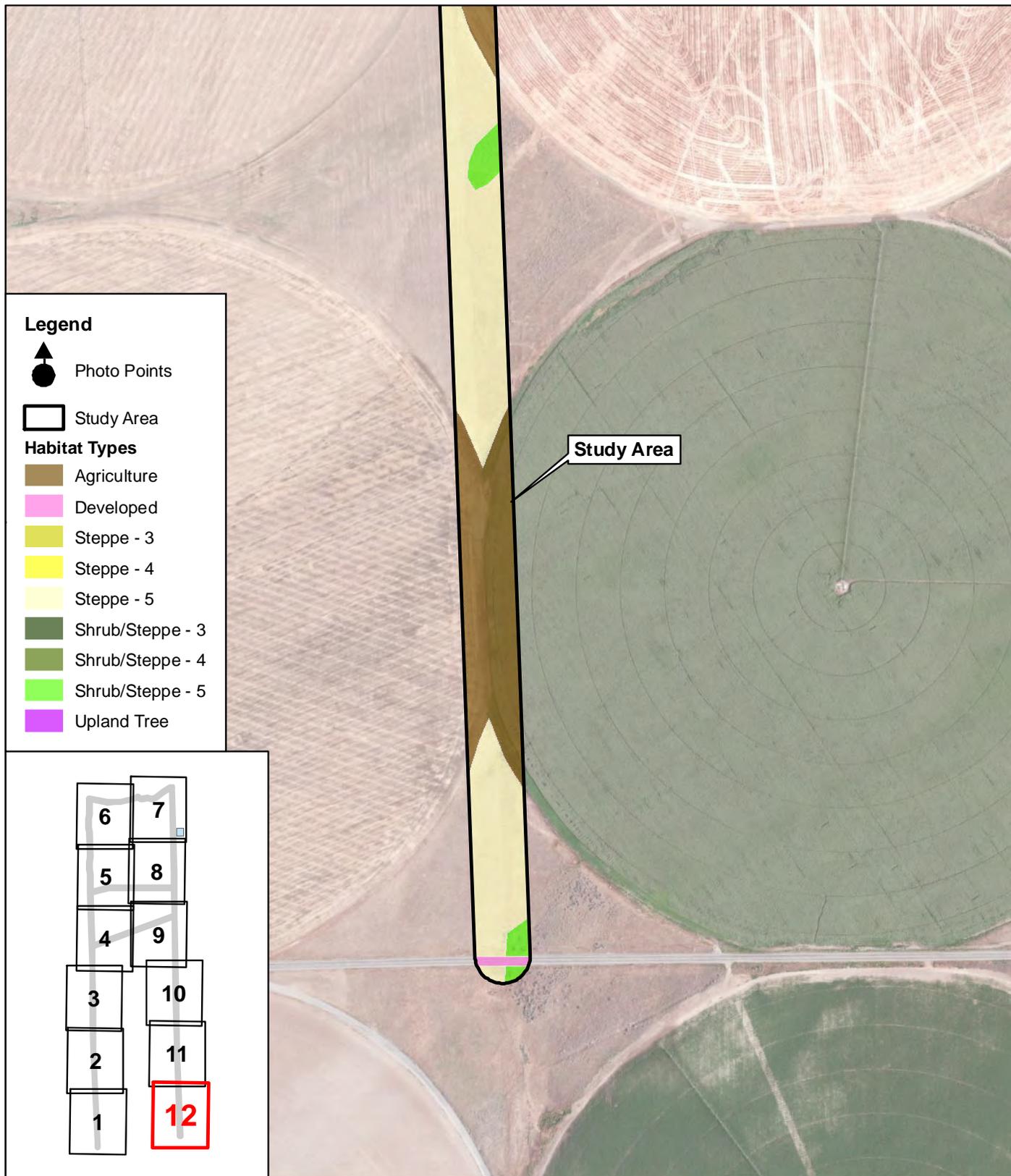




ESRI, ArcGIS Online, World Imagery. Microsoft. 2010. UC-G.

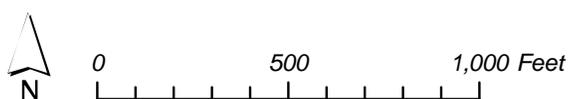
**Figure 2, Sheet 11**  
Habitat Mapping





ESRI, ArcGIS Online, World Imagery. Microsoft. 2010. UC-G.

**Figure 2, Sheet 12**  
Habitat Mapping



## ***APPENDIX B –PHOTOGRAPHS***





**Photo 1: Looking south along Peterson Road across private lands and typical Category 5 steppe habitat (100% weeds). Homestead with Lombardy poplar grove lies outside study area west of Peterson Road.**



**Photo 2: Looking south along Peterson Road across BLM land at typical Category 5 shrub-steppe habitat dominated by cheatgrass.**



**Photo 3: Looking west along Option A at typical Category 5 shrub-steppe habitat.**



**Photo 4: Looking east-southeast along Option A at typical Category 5 habitat.**



**Photo 5: Looking south along the north end of Option B (Alternative 2) at typical habitat present along the property boundary between private and BLM lands.**



**Photo 6: Looking south along Option B (Alternative 2) at typical Category 3 steppe habitat present on BLM lands in this section. Note weedy habitat present along the fenceline under the powerlines.**



**Photo 7: Looking north along Alternative 2 at a mixture of Category 3 and Category 5 herbaceous habitat present on BLM lands in this section.**



**Photo 8: Looking southwest along Alternative 2 at a mixture of Category 3 and Category 5 herbaceous habitat present on BLM lands in this section.**



**Photo 9: Looking south along Alternative 2 at a mixture of Category 5 (foreground) and Category 3 (far ground) herbaceous habitat present on BLM lands in this section. Elm trees in middle ground lie outside the study area.**



**Photo 10: Looking north along Alternative 2 at Category 3 shrub-steppe habitat present on BLM lands in this section.**

**APPENDIX C – WILDLIFE SPECIES OBSERVED DURING SITE  
RECONNAISSANCE**



**Wildlife Species (or sign) Observed During Site Reconnaissance Conducted on July 2 and 3, 2014**

Species	Alternative 1	Option A	Option B	Alternative 2
American badger ( <i>Taxidea taxus</i> )		x (burrow)		x (burrow)
American crow ( <i>Corvus brachyrhynchos</i> )	x			
American kestrel ( <i>Falco sparverius</i> )		x	x	
American robin ( <i>Turdus migratorius</i> )	x	x		
Bank swallow ( <i>Riparia riparia</i> )	x (burrow)			
Brewer's blackbird ( <i>Euphagus cyanocephalus</i> )	x			x
Brown-headed cowbird ( <i>Molothrus ater</i> )	x			
Bullock's oriole ( <i>Icterus bullockii</i> )				x (nest adj.)
Common raven ( <i>Corvus corax</i> )		x		x
Coyote ( <i>Canis latrans</i> )		x (tracks)	x (tracks)	x (tracks)
European starling ( <i>Sturnus vulgaris</i> )	x	x		
Grasshopper sparrow ( <i>Ammodramus savannarum</i> )			x	x
Horned lark ( <i>Eremophila alpestris</i> )	x		x	x
House finch ( <i>Carpodacus mexicanus</i> )	x			
Mule deer ( <i>Odocoileus hemionus</i> )	x			x
Northern harrier ( <i>Circus cyaneus</i> )	x			
Red-tailed hawk ( <i>Buteo jamaicensis</i> )			x	x
Ring-necked pheasant ( <i>Phasianus colchicus</i> )	x			
Song sparrow ( <i>Melospiza melodia</i> )	x			
Swainson's hawk ( <i>Buteo swainsoni</i> )	x (nest)			x
Turkey vulture ( <i>Cathartes aura</i> )	x	x	x	
Violet-green swallow ( <i>Tachycineta thalassina</i> )	x			
Western kingbird ( <i>Tyrannus verticalis</i> )				x
Western meadowlark ( <i>Sturnella neglecta</i> )	x			x



## ***APPENDIX D–HABITAT IMPACTS BY ALTERNATIVE***



Habitat Impacts, Alternative 1, Option A

Habitat Type	Category	Perm	Temp	Total Impacts	Cat 3	Cat 4	Cat 5	Total Impacts to Category 3-5 shrub-steppe
AG		1.9	2.1	4.0	--	--	--	
DE		15.6	2.2	17.8	--	--	--	
ST	3	0.0	0.0	0.0	0.0	--	--	
ST	4	0.0	0.0	0.0	--	0.0	--	
ST	5	3.2	3.9	7.1	--	--	7.1	
SH	3	0.0	0.0	0.0	0.0	--	--	
SH	4	0.0	0.0	0.0	--	0.0	--	
SH	5	3.8	7.5	11.3	--	--	11.3	
		<b>24.4</b>	<b>15.7</b>	<b>40.1</b>	<b>0.0</b>	<b>0.0</b>	<b>18.3</b>	<b>18.3</b>

Habitat Impacts, Alternative 1, Option B

Habitat Type	Category	Perm	Temp	Total Impacts	Cat 3	Cat 4	Cat 5	Total Impacts to Category 3-5 shrub-steppe
AG		1.6	1.4	3.0	--	--	--	
DE		10.0	1.5	11.5	--	--	--	
ST	3	1.1	1.2	2.3	2.3	--	--	
ST	4	1.0	1.0	1.9	--	1.9	--	
ST	5	6.1	5.5	11.6	--	--	11.6	
SH	3	0.0	0.0	0.0	0.0	--	--	
SH	4	0.0	0.0	0.0	--	0.0	--	
SH	5	4.9	5.5	10.4	--	--	10.4	
		<b>24.7</b>	<b>16.0</b>	<b>40.7</b>	<b>2.3</b>	<b>1.9</b>	<b>22.0</b>	<b>26.2</b>

Habitat Impacts, Alternative 1, Option C

Habitat Type	Category	Perm	Temp	Total Impacts	Cat 3	Cat 4	Cat 5	Total Impacts to Category 3-5 shrub-steppe
AG		1.6	1.1	2.7	--	--	--	
DE		8.2	1.8	10.0	--	--	--	
ST	3	1.7	1.8	3.5	3.5	--	--	
ST	4	1.0	1.0	1.9	--	1.9	--	
ST	5	4.5	3.9	8.4	--	--	8.4	
SH	3	0.7	0.8	1.5	1.5	--	--	
SH	4	0.0	0.0	0.0	--	0.0	--	
SH	5	5.8	6.7	12.5	--	--	12.5	
		<b>23.4</b>	<b>17.1</b>	<b>40.5</b>	<b>5.0</b>	<b>1.9</b>	<b>20.9</b>	<b>27.9</b>

### Habitat Impacts, Alternative 2

Habitat Type	Category	Perm	Temp	Total Impacts	Cat 3	Cat 4	Cat 5	Total Impacts to Category 3-5 shrub-steppe
AG		2.0	2.5	4.4	--	--	--	
DE		0.1	0.2	0.3	--	--	--	
ST	3	5.2	5.7	10.8	10.8	--	--	
ST	4	1.8	1.8	3.7	--	3.7	--	
ST	5	5.2	5.7	10.9	--	--	10.9	
SH	3	3.1	3.5	6.6	6.6	--	--	
SH	4	0.7	0.7	1.4	--	1.4	--	
SH	5	1.5	1.7	3.3	--	--	3.3	
		<b>19.6</b>	<b>21.7</b>	<b>41.3</b>	<b>17.4</b>	<b>5.0</b>	<b>14.2</b>	<b>36.6</b>

### List of Abbreviations

Developed (DE), Agricultural (AG), Steppe (ST), Shrub-Steppe (SH), and Upland Trees (UT)

## APPENDIX E

### Prime and Unique Farmlands Form

**FARMLAND CONVERSION IMPACT RATING  
FOR CORRIDOR TYPE PROJECTS**

<b>PART I (To be completed by Federal Agency)</b>	3. Date of Land Evaluation Request	4. Sheet 1 of _____
---	------------------------------------	---------------------

1. Name of Project	5. Federal Agency Involved
--------------------	----------------------------

2. Type of Project	6. County and State
--------------------	---------------------

<b>PART II (To be completed by NRCS)</b>	1. Date Request Received by NRCS	2. Person Completing Form
--	----------------------------------	---------------------------

3. Does the corridor contain prime, unique statewide or local important farmland? (If no, the FPPA does not apply - Do not complete additional parts of this form). YES <input type="checkbox"/> NO <input type="checkbox"/>	4. Acres Irrigated   Average Farm Size
---	--

5. Major Crop(s)	6. Farmable Land in Government Jurisdiction Acres: _____ %	7. Amount of Farmland As Defined in FPPA Acres: _____ %
------------------	---	--

8. Name Of Land Evaluation System Used	9. Name of Local Site Assessment System	10. Date Land Evaluation Returned by NRCS
--	---	---

<b>PART III (To be completed by Federal Agency)</b>	<b>Alternative Corridor For Segment</b>			
---	---	--	--	--

	Corridor A	Corridor B	Corridor C	Corridor D
A. Total Acres To Be Converted Directly				
B. Total Acres To Be Converted Indirectly, Or To Receive Services				
C. Total Acres In Corridor				

<b>PART IV (To be completed by NRCS) Land Evaluation Information</b>	
--	--

A. Total Acres Prime And Unique Farmland				
B. Total Acres Statewide And Local Important Farmland				
C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted				
D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value				

<b>PART V (To be completed by NRCS) Land Evaluation Information Criterion Relative value of Farmland to Be Serviced or Converted (Scale of 0 - 100 Points)</b>	
--	--

PART VI (To be completed by Federal Agency) Corridor Assessment Criteria (These criteria are explained in 7 CFR 658.5(c))	Maximum Points			
1. Area in Nonurban Use	15			
2. Perimeter in Nonurban Use	10			
3. Percent Of Corridor Being Farmed	20			
4. Protection Provided By State And Local Government	20			
5. Size of Present Farm Unit Compared To Average	10			
6. Creation Of Nonfarmable Farmland	25			
7. Availability Of Farm Support Services	5			
8. On-Farm Investments	20			
9. Effects Of Conversion On Farm Support Services	25			
10. Compatibility With Existing Agricultural Use	10			
<b>TOTAL CORRIDOR ASSESSMENT POINTS</b>	<b>160</b>			

<b>PART VII (To be completed by Federal Agency)</b>	
---	--

Relative Value Of Farmland (From Part V)	100			
Total Corridor Assessment (From Part VI above or a local site assessment)	160			
<b>TOTAL POINTS (Total of above 2 lines)</b>	<b>260</b>			

1. Corridor Selected:	2. Total Acres of Farmlands to be Converted by Project:	3. Date Of Selection:	4. Was A Local Site Assessment Used?  YES <input type="checkbox"/> NO <input type="checkbox"/>
-----------------------	---	-----------------------	--

5. Reason For Selection:
--------------------------

Signature of Person Completing this Part:	DATE
---	------

**NOTE: Complete a form for each segment with more than one Alternate Corridor**

## CORRIDOR - TYPE SITE ASSESSMENT CRITERIA

The following criteria are to be used for projects that have a linear or corridor - type site configuration connecting two distant points, and crossing several different tracts of land. These include utility lines, highways, railroads, stream improvements, and flood control systems. Federal agencies are to assess the suitability of each corridor - type site or design alternative for protection as farmland along with the land evaluation information.

(1) How much land is in nonurban use within a radius of 1.0 mile from where the project is intended?

More than 90 percent - 15 points  
90 to 20 percent - 14 to 1 point(s)  
Less than 20 percent - 0 points

(2) How much of the perimeter of the site borders on land in nonurban use?

More than 90 percent - 10 points  
90 to 20 percent - 9 to 1 point(s)  
Less than 20 percent - 0 points

(3) How much of the site has been farmed (managed for a scheduled harvest or timber activity) more than five of the last 10 years?

More than 90 percent - 20 points  
90 to 20 percent - 19 to 1 point(s)  
Less than 20 percent - 0 points

(4) Is the site subject to state or unit of local government policies or programs to protect farmland or covered by private programs to protect farmland?

Site is protected - 20 points  
Site is not protected - 0 points

(5) Is the farm unit(s) containing the site (before the project) as large as the average - size farming unit in the County ?

(Average farm sizes in each county are available from the NRCS field offices in each state. Data are from the latest available Census of Agriculture, Acreage or Farm Units in Operation with \$1,000 or more in sales.)

As large or larger - 10 points  
Below average - deduct 1 point for each 5 percent below the average, down to 0 points if 50 percent or more below average - 9 to 0 points

(6) If the site is chosen for the project, how much of the remaining land on the farm will become non-farmable because of interference with land patterns?

Acreage equal to more than 25 percent of acres directly converted by the project - 25 points  
Acreage equal to between 25 and 5 percent of the acres directly converted by the project - 1 to 24 point(s)  
Acreage equal to less than 5 percent of the acres directly converted by the project - 0 points

(7) Does the site have available adequate supply of farm support services and markets, i.e., farm suppliers, equipment dealers, processing and storage facilities and farmer's markets?

All required services are available - 5 points  
Some required services are available - 4 to 1 point(s)  
No required services are available - 0 points

(8) Does the site have substantial and well-maintained on-farm investments such as barns, other storage building, fruit trees and vines, field terraces, drainage, irrigation, waterways, or other soil and water conservation measures?

High amount of on-farm investment - 20 points  
Moderate amount of on-farm investment - 19 to 1 point(s)  
No on-farm investment - 0 points

(9) Would the project at this site, by converting farmland to nonagricultural use, reduce the demand for farm support services so as to jeopardize the continued existence of these support services and thus, the viability of the farms remaining in the area?

Substantial reduction in demand for support services if the site is converted - 25 points  
Some reduction in demand for support services if the site is converted - 1 to 24 point(s)  
No significant reduction in demand for support services if the site is converted - 0 points

(10) Is the kind and intensity of the proposed use of the site sufficiently incompatible with agriculture that it is likely to contribute to the eventual conversion of surrounding farmland to nonagricultural use?

Proposed project is incompatible to existing agricultural use of surrounding farmland - 10 points  
Proposed project is tolerable to existing agricultural use of surrounding farmland - 9 to 1 point(s)  
Proposed project is fully compatible with existing agricultural use of surrounding farmland - 0 points

---





U.S. Department  
of Transportation

**Federal Highway  
Administration**

Western Federal Lands Highway Division  
610 E. Fifth Street  
Vancouver, WA 98661  
Phone 360-619-7700  
Fax 360-619-7846

December 18, 2014

In Reply Refer To: HFL-17

Mark Hatchel  
Bureau of Land Management  
Spokane District  
Border Field Office  
1103 N. Fancher Road  
Spokane Valley, Washington 99212-1275

RE: Juniper Dunes Access Road  
*De Minimis* Section 4(f) Evaluation  
WA Franklin 2013(1)

Dear Mark,

**Purpose of this Letter**

The purpose of this letter is to request Bureau of Land Management's (BLM) concurrence with the Federal Highway Administration's *de minimis* impact recommendation regarding properties that are protected under Section 4(f) of the Department of Transportation Act.

**Background**

The Western Federal Lands Division of the Federal Highway Administration (FHWA), in partnership with the BLM and Franklin County, is planning to construct a public access road to the Juniper Dunes Wilderness and off-highway vehicle areas (Juniper Dunes).

Juniper Dunes is located approximately 10 miles northeast of Pasco, Washington, in Franklin County, and consists of three adjoining areas comprising a total of approximately 19,600 acres:

- Juniper Dunes Wilderness - A 7,100-acre wilderness area.
- OHV "Open" Area - A 3,920-acre off-highway vehicle (OHV) area.
- ACEC - A 8,620-acre Area of Critical Environmental Concern (ACEC).

The project is being developed as part of the FHWA Federal Lands Access Program. FHWA is the lead agency, and BLM and Franklin County are Cooperating Agencies, in addressing National Environmental Policy Act (NEPA) compliance for this project.

The U.S. Department of Transportation (USDOT) Act of 1966 includes a special provision, Section 4(f), which stipulates that the FHWA and other USDOT agencies may not grant approval for a project if it uses land that is a publicly-owned park, recreation area, wildlife and waterfowl refuge, or any significant historic site unless: 1) there is no prudent and feasible alternative to the use of such land, and 2) any such program or project includes all possible planning to minimize harm to these resources.

Section 4(f) was codified under Title 49 United States Code (U.S.C.) Section 1653(f) (Section 4(f) of the USDOT Act of 1966). In 2005, the Safe, Accountable, Flexible, and Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) made the first substantive revision to Section 4(f) since 1966. SAFETEA-LU amended existing Section 4(f) legislation to simplify the processing and approval of projects that have only *de minimis* impacts on properties protected by Section 4(f). If the project is determined to have a *de minimis* impact on a property, an analysis of avoidance alternatives is not required, and the Section 4(f) evaluation process is considered complete.

#### **4(f) evaluation summary**

The following is a summary of the 4(f) evaluation in the December 2, 2014 pre-draft version of the *Juniper Dunes Access Road Environmental Assessment and 4(f) Evaluation* (EA) document. BLM, as a Cooperating Agency, has reviewed the pre-draft version of the EA.

There are two 4(f) properties in the project area:

- 1) The Juniper Dunes OHV Area. It is considered a 4(f) property because it is a recreation area.
- 2) The Juniper Dunes Area of Critical Environmental Concern (ACEC). It is considered a 4(f) property because it is similar to a wildlife refuge.

A project's impact to a Section 4(f) resource is considered *de minimis* to a park, recreation area, or wildlife and waterfowl refuge if:

- *The transportation use of the Section 4(f) resource, together with any impact avoidance, minimization, and mitigation or enhancement measures incorporated into the project, does not adversely affect the activities, features, and attributes that qualify the resource for protection under Section 4(f).*
- *The official(s) with jurisdiction over the property are informed of FHWA's intent to make the de minimis impact finding based on their written concurrence that the project would not adversely affect the activities, features, and attributes that qualify the resource for protection under Section 4(f).*
- *The public has been afforded an opportunity to review and comment on the effects of the project on the protected activities, features, and attributes of the Section 4(f) resource.*

FHWA has determined that the Juniper Dunes Access Road project's impact should be considered *de minimis*, because it will meet the criteria of all three of the bullet points above. A summary of why the project meets the criteria of the first bullet point is below:

#### Juniper Dunes OHV Area

The Juniper Dunes OHV Area qualifies as a 4(f) resource because it is a recreation site. All build alternatives would convert varying amounts of the Juniper Dunes OHV Area from recreation to transportation. The OHV Area is 3,920 acres. The alternative with the greatest impact, Alternative 1A, would convert approximately 4.36 acres from recreation to transportation use. The conversion of 4.36 acres would be just over 1/10<sup>th</sup> of 1 percent of the entire recreation area. Since the proposed transportation use is such a small percentage of the overall area, and the project is being built specifically for the purpose of accessing Juniper Dunes and would benefit recreation in the OHV area, it "does not adversely affect the activities, features, and attributes that qualify the resource for protection under Section 4(f)."

#### Juniper Dunes ACEC

The ACEC qualifies as a 4(f) resource because it is a wildlife management area. All build alternatives would convert varying amounts of the Juniper Dunes ACEC from recreation to transportation. The alternative with the greatest impact, Alternative 1C, would convert approximately 14.12 acres from recreation to transportation use. The Juniper Dunes ACEC is 8,620 acres. The conversion of 14.12 acres would be just under 1/6<sup>th</sup> of 1 percent of the entire wildlife management area. Alternative 1C has a portion

that traverses through Smith Canyon, which is designated as ACEC, however, there is extensive OHV use in the canyon, so the quality of the habitat is degraded. The ACEC areas other than in Smith Canyon are all at the border of the ACEC, most near agricultural operations or Peterson Road, and therefore are not prime habitat.

Since the proposed transportation use is such a small percentage of the overall area and it does not convert prime habitat, it “does not adversely affect the activities, features, and attributes that qualify the resource for protection under Section 4(f).”

To meet the criteria of the third bullet point, the public will be given the chance to comment on the *de minimis* determination during the public comment period of the EA. A public meeting will be held during the EA public comment period and FHWA will explain their intention to make a *de minimis* determination during that public meeting.

To meet the criteria of the second bullet point, BLM will need to review and concur with the FHWA’s *de minimis* finding. BLM has reviewed the pre-draft version of the EA, and FHWA is asking for BLM concurrence with the *de minimis* finding in this letter.

For your convenience, I have added statements and signature concurrence lines below. If you wish, you may sign and return this letter to me at the above address, or via email.

The Juniper Dunes Access Road project will not adversely affect the activities, features, and attributes that qualify the *Juniper Dunes OHV Area* for protection under Section 4(f).

Concurrence:  Date 1/12/2015  
Dennis Strange  
Field Manager  
Title

The Juniper Dunes Access Road project will not adversely affect the activities, features, and attributes that qualify the *Juniper Dunes ACEC* for protection under Section 4(f).

Concurrence:  Date 1/12/2015  
Dennis Strange  
Field Manager  
Title

Please call me at 360-619-7803 if you have any questions. Thank you.

Regards,

/s/ Seth English-Young  
Environmental Protection Specialist