



National Park Service
U.S. Department of the Interior
San Antonio Missions National Historical Park
San Antonio, Texas

Finding of No Significant Impact **Mission San Juan de Capistrano** **San Juan Farm: Demonstration Area and Agricultural Fields with a** **Barn, Parking Lot, Visitor Contact Station, and Trails**

Background

In compliance with the National Environmental Policy Act, the National Park Service (NPS) prepared an Environmental Assessment (EA) to examine various alternatives and environmental impacts associated with the proposal to develop the San Juan Farm including a demonstration area with a barn, parking lot, visitor contact station, and trails.

Planning documentation identified the creation of a demonstration farm as a critical component to enable the interpretation of park interpretive themes. Interpretive themes are the key stories through which visitors connect park resources to the larger ideas, meaning, and values of which they are a part. The primary themes of Mission San Juan are related to the mission as an economic center and include *"how the San Antonio missions became self-sufficient and self-sustaining outposts for the Spanish Empire"*, and *"how the San Antonio missions system accelerated the encounter, adaptation, and assimilation of cultures that created a dynamic, complex and diverse community that has evolved from an outpost on the edge of the Spanish Empire into our nation's 7th largest city."* The demonstration farm will illustrate, through hands-on practical programs and demonstrations, these primary themes. No activity or demonstration program that currently exist within the park that can convey these primary park themes to the public as effectively as a working demonstration farm. There is therefore a need to include this diversification of agricultural activities into the demonstration farm.

Infrastructure from the original farming operations is still evident in the form of the historic labores and the San Juan Acequia. The presence of these two factors facilitates the creation of a demonstration farm because they are key components to mission era farming infrastructure. Despite these two key aspects of the farming operations being in place, the current landscape does not, however, have the necessary infrastructure needed to adequately support farming activities or visitor services. This lack of infrastructure to support the farming activities will limit the success of the proposed farming activities. There is therefore a need to introduce storage facilities for farming equipment such as a barn and farming implement storage sheds. The lack of visitor support services currently at the mission will limit the visitor experience and educational benefits that will be associated with the demonstration farm. There is therefore a need to introduce infrastructure that will provide a venue that includes basic services as well as educational opportunities for visitors to the mission, such as a visitor contact station and pedestrian trail networks. Additional support services will also include a need to provide adequate parking facilities for the mission and surrounding attractions.

Overtime, many of the properties surrounding the mission compound, which were originally labores used to produce crops for mission population, were reclaimed for either residential or small-scale private agricultural operations. This has resulted in a degradation of the original Spanish

Colonial landscape. Since its creation in 1978, SAAN has acquired many acres of these properties surrounding the mission through fee purchase and donations. The acquisition of these properties, some of which is still ongoing in association with the San Antonio River Improvements Project (SARIP), was conducted in order to create an opportunity to rehabilitate the modified cultural landscape surrounding Mission San Juan to enhance the historic integrity of the mission landscape. There is therefore a need to re-establish the historic labores, which surround the mission compound, and reintroduce agricultural activities onto these labores. The introduction of these farming activities also creates a need to establish a mechanism such as special use agricultural fields or the lease of prepared agricultural fields in order to successfully manage and operate the additional farming operations.

The park has a number of operational partners due to the shared ownership of portions of the land within the park boundaries. This shared ownership has resulted in a number of cooperative agreements implemented to promote the shared management and use of park resources. These partners include the City of San Antonio, San Antonio River Authority (SARA), Bexar County and the Archdiocese. The area surrounding the Mission San Juan and the park in general is currently undergoing a number of development initiatives that are complementary to the SAAN themes and objectives and can be expected to result in an increase in the number of park visitors. These projects include the SARIP, the Missions Trail Project, and the construction of the Mission Library. These local initiatives created a need for SAAN to promote local connectivity within the area.

Selection of the Preferred Alternative and Alternatives Considered

Three action alternatives, plus the no-action alternative, were identified based on program goals and objectives, internal and external scoping, guidance from existing park plans, and NPS policy; Alternative 1 – Minimum Action, Alternative 2 – Medium Action and Alternative 3 – Maximum Action. Alternative 3 is NPS's preferred alternative because it best meets the purpose and need for the project as well as the project objectives to

1. To illustrate Spanish colonial farming technology and practices and create an opportunity for the public to learn San Juan's distinct history through interpretive initiatives,
2. Provide necessary visitor services and facilities in order to accommodate visitors and farming equipment,
3. Rehabilitate the modified cultural landscape surrounding Mission San Juan where feasible and appropriate while preserving and enhancing historic integrity,
4. Promote local connectivity within the area, especially to adjacent development initiatives,
5. Promote and enhance community and local partnerships and contribute to the local economy through the development of the San Juan Farm.

Alternative 1 includes re-introducing farming activities at Mission San Juan. The farming activities will include initiating a 2.5-acre demonstration farming area and preparing 5 acres of agricultural land that will be available for leasing. Proposed farming activities will be further extended by creating a 2.5-acre orchard, a 1.5-acre vineyard, and a 1-acre animal corral. The alternative also includes the construction of supporting infrastructure. This infrastructure includes a barn and farming implements/equipment storage sheds, an asphalt parking lot, and various pedestrian trails. Alternative 2 will include all of components as described above for alternative 1 with some notable additions. This alternative also includes further extending the farming activities that were described under alternative 1. Alternative 3 will include all of components of alternatives 1 and 2 but under this alternative the prepared agricultural land or leased/special use permit agricultural areas will be greatly extended. In addition, under this alternative, Villamain Road will become an access controlled NPS road which will be closed to traffic during the night.

Because each alternative represents a progression of the extent of the proposed park improvements, each alternative is a project phase that can be implemented, as resources are available, to ultimately provide the preferred alternative.

Mitigation Measures

The following mitigation measures were developed to minimize the degree and/or severity of adverse effects that will result from the implementation of the action alternatives.

Design:

- Hike and bike and pedestrian trails will be designed and installed in a manner that is consistent with existing trails in terms of width and material usage.
- Sustainable building technologies will be incorporated into the design of the contact station and barn.
- The design approach will ensure that additions, alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the cultural landscape. New features will be designed in a way that they are differentiated from the old but are also compatible with the historic materials, features, and massing of the landscape.
- Additions and adjacent or related new construction will be designed in such a way that should the structure need to be removed in the future; the essential form and integrity of the cultural landscape will be unimpaired.
- Any features to be replaced, removed, or altered would be comprehensively documented prior to actual physical work. All ground disturbing activities during construction will be monitored by a professional archeologist.
- A Storm Water Pollution Prevention Plan (SW3P) will be developed during project design and implemented and maintained during construction to minimize impacts as specified by EPA regulations for construction projects. The SW3P will include both construction and staging areas.

Construction:

- Construction zones, particularly for the barn, parking lot and contact station, will be identified and fenced with construction tape or some similar material prior to any construction activity. The fencing will define the construction zone and confine activity to the minimum area required for construction. All protection measures will be clearly stated in the construction specifications, and workers will be instructed to avoid conducting activities beyond the construction zone as defined by the construction zone fencing.
- Although only minimal disturbance is anticipated, re-vegetation and re-contouring of disturbed areas will take place following construction. Re-vegetation efforts will rely primarily on the use of native vegetation. The replacement of non-native Bermuda and St. Augustine grasses with native grasses as the primary ground cover is preferable. Planting will include only native trees, primarily mesquite, live oak, cedar elm, flowering or desert willow, redbud, and pecan.
- Weed control methods will be implemented to minimize the introduction of noxious weeds. Construction equipment will be washed prior to entering the work site.
- Disturbed soils are susceptible to erosion until revegetation takes place, so standard erosion control measures such as silt fences and/or sand bags will be used to minimize any potential soil erosion.

- Fugitive dust generated by construction will be controlled by spraying water on the construction site, if necessary.
- To reduce noise and emissions, construction equipment will not be permitted to idle for long periods of time.
- To minimize possible petrochemical leaks from construction equipment, the contractor will regularly monitor and check construction equipment to identify and repair any leaks.
- If construction activities are scheduled within the nesting season for birds protected under the MBTA, generally April 1 through July 15, pre-construction surveys will be conducted for nests. No construction activities will be conducted in identified nesting areas until the young have fledged.
- All ground penetrating activities will be monitored by a professional archeologist.
- Should construction unearth previously undiscovered cultural resources, work will be stopped in the area of any discovery, and the park will consult with the state historic preservation officer and the Advisory Council on Historic Preservation, as necessary, according to §36 CFR 800.13, *Post Review Discoveries*. In the unlikely event that human remains are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act (1990) will be followed.
- NPS will ensure that all contractors and subcontractors are informed of the penalties for illegally collecting artifacts or intentionally damaging paleontological materials, archeological sites, or historic properties. Contractors and subcontractors will also be instructed on procedures to follow in case previously unknown paleontological or archeological resources are uncovered during construction.
- To minimize the potential for impacts to park visitors, variations on construction timing may be considered.
- Construction personnel will be responsible for ensuring trash is properly disposed of and not left uncontained onsite overnight. A trash abatement program, which will include recycling initiatives, will be initiated during pre-construction phases of the project, and will continue throughout the duration of the project.
- Walking surveys will be performed by NPS personnel prior to any activities that have the potential to harm or displace wildlife.

Operations:

- Trails within and surrounding the proposed improvements will be for pedestrian use and emergency vehicle access only. A hike and bike trail is however proposed along Villamain Road; the formal rulemaking process will be followed prior to the potential introduction of bicycle use on the trail.
- Air quality will be preserved by using propane equipment instead of gasoline-burning models and encouraging staff and volunteers to take public transportation when possible.
- Farming practices protocol and policies for both demonstration farm and leased farmland would be include: water quality control measures for irrigation, storm water run-off from fields; water conservation measures for irrigation; managing water usage within the limits set by water rights, and soil conservation control measures to mitigate potential soil erosion.
- Cultural resource discovery and recovery standards will minimize the disturbance of archeological resources and/or provide guidance on recordation during the operation of the San

Juan Farm, including crop choice and rotation, the use of mechanized machinery, labor requirements, and leasing agreements, including terms and conditions

Environmentally Preferable Alternative

According to the CEQ regulations implementing NEPA (43 CFR 46.30), the environmentally preferable alternative is the alternative “that causes the least damage to the biological and physical environment and best protects, preserves, and enhances historical, cultural, and natural resources. The environmentally preferable alternative is identified upon consideration and weighing by the Responsible Official of long-term environmental impacts against short-term impacts in evaluating what is the best protection of these resources. In some situations, such as when different alternatives impact different resources to different degrees, there may be more than one environmentally preferable alternative.”

Alternative 3 is the environmentally preferable alternative for several reasons, 1.) The alternative will include the demonstration farm and the facilities needed to support the farm and park visitors. 2.) The alternative will maximize the rehabilitation of the modified cultural landscape surrounding the mission. 3.) While there will be some ground disturbance and vegetation removal, all of the disturbances will be in areas of previously disturbed elements of the biological and physical environment. 4.) The extended reclaimed farmland included under this alternative will contribute to the sustainability of the local community through the production of food crops and through additional economic opportunities created by the extended farmland. For these reasons, Alternative 3 causes the least damage to the biological and physical environment and best protects, preserves, and enhances historical, cultural, and natural resources, thereby making it the environmentally preferable alternative.

By contrast, the no-action alternative is not the environmentally preferable alternative because, the biological and physical environments within the project area are generally previously disturbed and the no-action alternative will not protect, preserve, and enhance historical, cultural, and natural resources. Therefore, 1.) Spanish colonial farming technology will not be demonstrated and an opportunity to learn about San Juan’s history will not be provided. 2.) No visitor services or facilities needed to support the farm will be provided. 3.) The modified cultural landscape will not be rehabilitated. 4.) Local connectivity and community partnerships will not be promoted.

Why the Preferred Alternative Will Not Have a Significant Effect on the Human Environment

As defined in 40 CFR §1508.27, significance is determined by examining the following criteria:

Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial.

Implementation of the preferred (selected) alternative will result in some adverse impacts; however, the overall benefit of the project, particularly to the cultural landscape and visitor use and experience outweighs these negative effects. The adverse effects are summarized as follows.

Minor, temporary, adverse impacts to visitor use and experience will result from increased noise and dust associated with construction activities. Moderate adverse, site-specific, short-term moderate impacts on soils will result from the ground disturbance and the associated potential erosion resulting from the re-establishment of the existing agricultural fields. Moderate adverse, site-specific, long-term impacts will result from the removal of successional pecan-sugarberry forest and herbaceous vegetation. Minor adverse, direct and/or indirect, site-specific, short- and/or long-term impacts to wildlife will result from disturbances and removal of wildlife habitat. Minor adverse, site-specific, long-term impacts to archeological resources may result from the discovery of unknown sub-surface archeological resources. Construction phase archeological monitoring will

ensure that any archeological resources that are disturbed will be appropriately coordinated per the Texas Antiquities Code. As a result of these efforts, should archeological resources be discovered, beneficial, local, long-term, minor impacts could result from the potential contributions made to the archeological record of the Spanish colonial period. Minor to moderate, adverse, site-specific, short- and/or long-term impacts to park operations and management will result as these structures will need to be modified to accommodate the anticipated increase in visitor traffic.

The overall benefit of implementing the preferred alternative is that the cultural landscape will be rehabilitated to a moderate degree because the expansion of farming operations will contribute to a visually pleasing, open agricultural related landscape, benefitting the integrity of setting, feeling and association and enhance contributing features and patterns of land use, spatial organization and views and vistas.

In addition, implementing the preferred alternative will have a moderate, long-term beneficial impact on visitor use and experience. These beneficial impacts to visitor use and experience will primarily result from the extension of farming activities, which will increase educational and recreational opportunities for the park visitor and the creation of a visitor contact station which will provide the visitor with an opportunity to gain an understanding of the mission labores and the vital role that they played in the dominant themes of mission life.

Implementing the preferred alternative will also have a beneficial, local, long-term, and moderate impact on socioeconomics. These benefits will primarily result from the further economic opportunities offered by the additional visitor traffic who in turn, will contribute to the local economy and the extended lease/special use agricultural area.

The degree to which the proposed action affects public health or safety

The preferred alternative will have a negligible beneficial effect on public health and safety through the production of organic produce and the formalization of pedestrian trails.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas

The preferred alternative will not impact unique characteristics of the area including park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas because these resources either do not exist in the project area or will be avoided.

Five known archeological features are either in or very close to the area of potential effect for the project. As discussed later in this document, the implementation of the preferred alternative will not affect these archeological resources.

The degree to which the effects on the quality of the human environment are likely to be highly controversial

Throughout the environmental process, the proposal to develop the San Juan Farm has not been highly controversial, nor are the effects expected to generate future controversy.

The degree to which the possible effects on the quality on the human environment are highly uncertain or involve unique or unknown risks

The effects of developing the San Juan Farm are fairly straightforward and do not pose uncertainties. Construction phase archeological monitoring will ensure that any uncertainties associated with undiscovered archeological resources are mitigated to the greatest extent possible. The environmental process has not identified any effects that may involve highly unique or unknown risks.

The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration

The preferred alternative is not expected to set a precedent for future actions with significant effects; nor does it represent a decision in principle about a future consideration.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.

Cumulative effects were analyzed in the EA and no significant cumulative impacts were identified.

The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.

The preferred alternative will not result in adverse impacts to known NRHP eligible historic structures or the cultural landscape. Construction phase archeological monitoring will ensure that any uncertainties associated with undiscovered archeological resources are mitigated to the greatest extent possible.

Archeological investigations were conducted on the 55-acre portion of the preferred alternative that is located to the west of Villamain Road. This property is not currently owned by NPS and the study was conducted in support of property acquisition associated with San Antonio River Improvement Project mitigation efforts. The property will be donated to and incorporated into SAAN. Eight archeological sites were discovered during pedestrian survey, which included backhoe trenching. Of these sites, three were determined to be either eligible or potentially eligible.

The San Juan Acequia is listed on the National Register of Historic Places. Although the extension of the farming activities will be in close proximity to the eligible resource, there will be no adverse effect.

The Lewis farmstead was a pecan orchard throughout much of the twentieth century, and Garrett Lewis operated it in the 1950s and 1960s as a pecan orchard and egg farm. It is potentially eligible for the National Register. A pedestrian survey of the Ringelstein pre-historic campsite revealed widely scattered prehistoric artifacts, including several lithic tools (41BX1785). Current evidence suggests that the site has a high probability to contain intact buried archeological remains in stratified alluvial contexts. Site 41BX1785 has been determined to be eligible for the National Register for portions of the site outside of the proposed project.

The preferred alternative has the potential to adversely impact these potentially eligible archeological sites. Following the acquisition of the property, additional historical research and subsurface testing will be conducted in order to determine eligibility.

Correspondence received from Texas Historical Commission on February 3, 2012 concurred with the San Antonio Missions National Historical Park's no adverse effect determination for the proposed project.

The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.

There will be "no effect" on endangered or threatened species or habitat per §7 of the Endangered Species Act. Texas Parks and Wildlife did not respond to correspondence about the project.

Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment

The action will not violate any federal, state, or local laws or environmental protection laws.

Public Involvement and Consultation

The EA was made available for public review and comment during a 30-day period ending February 17, 2012. To notify the public of this review period, a letter was mailed to stakeholders, Native American tribes, interested parties, and newspapers. Copies of the document were sent to certain agencies, made available at the park office; and posted on the NPS PEPC website at http://parkplanning.nps.gov/san_juan_ea.

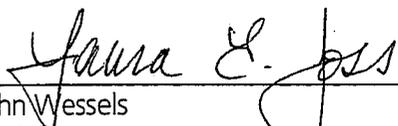
Two non-substantive comments were received via telephone from the public during this review period. Three non-substantive comments were received from Native American tribes.

Conclusion

As described above, the preferred alternative does not constitute an action meeting the criteria that normally require preparation of an Environmental Impact Statement (EIS). The preferred alternative will not have a significant effect on the human environment. Environmental impacts that could occur are limited in context and intensity, with generally adverse impacts that range from localized to widespread, short- to long-term, and negligible to moderate. There are no unmitigated adverse effects on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection law.

Based on the foregoing, NPS has determined that an EIS is not required for this project and thus will not be prepared.

Approved:


John Wessels
Regional Director, Intermountain Region, National Park Service

9/14/12
Date

Appendix - Impairment

National Park Service's *Management Policies, 2006* require analysis of potential effects to determine whether or not actions will impair park resources. The fundamental purpose of the national park system, established by the Organic Act and reaffirmed by the General Authorities Act, as amended, begins with a mandate to conserve park resources and values. National Park Service managers must always seek ways to avoid, or to minimize to the greatest degree practicable, adversely impacting park resources and values.

However, the laws do give the National Park Service the management discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, as long as the impact does not constitute impairment of the affected resources and values. Although Congress has given the National Park Service the management discretion to allow certain impacts within park, that discretion is limited by the statutory requirement that the National Park Service must leave park resources and values unimpaired, unless a particular law directly and specifically provides otherwise. The prohibited impairment is an impact that, in the professional judgment of the responsible National Park Service manager, will harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values. An impact to any park resource or value may, but does not necessarily, constitute an impairment. An impact will be more likely to constitute an impairment to the extent that it affects a resource or value whose conservation is:

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;
- key to the natural or cultural integrity of the park; or
- identified as a goal in the park's general management plan or other relevant NPS planning documents.

An impact will be less likely to constitute an impairment if it is an unavoidable result of an action necessary to pursue or restore the integrity of park resources or values and it cannot be further mitigated.

The park resources and values that are subject to the no-impairment standard include:

- the park's scenery, natural and historic objects, and wildlife, and the processes and conditions that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structures, and objects; museum collections; and native plants and animals;
- appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;
- the park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and
- any additional attributes encompassed by the specific values and purposes for which the park was established.

Impairment may result from NPS activities in managing the park, visitor activities, or activities undertaken by concessioners, contractors, and others operating in the park. The NPS's threshold

for considering whether there could be an impairment is based on whether an action will have major (or significant) effects.

Impairment findings are not necessary for visitor use and experience, socioeconomics, public health and safety, environmental justice, land use, and park operations, because impairment findings relate back to park resources and values, and these impact areas are not generally considered park resources or values according to the Organic Act, and cannot be impaired in the same way that an action can impair park resources and values. After dismissing the above topics, topics remaining to be evaluated for impairment include soils, vegetation, wildlife, cultural landscapes and historic structures and districts.

- Soils – Soils within and surrounding the Mission are generally previously disturbed. This disturbance is associated with a long history of plowing associated with agricultural activities as well as disturbances associated with the urban encroachments onto the historic landscape. The preferred alternative will result in adverse, site-specific, short- and/or long-term moderate impact on soil resources, therefore, there will be no impairment to soils.
- Vegetation – There are nine major vegetation communities within the footprint of the planned park improvements at Mission San Juan. Impacts to these vegetation communities will result from the implementation of the preferred alternative. The extension of the farmland, to the east of Villamain Road will utilize land that was previously part of the labores but has subsequently been reclaimed as grazing land or has been left unused allowing for the establishment of large woody vegetation. Vegetation in the affected area has been characterized as predominately pecan – sugarberry forest with some silver beardgrass - Johnsongrass herbaceous vegetation, honey mesquite - granjeno / prickly-pear species - South Texas Ericameria woodland and pruit shrubland. The preferred alternative will result in adverse, site-specific, long-term, and moderate impacts to successional vegetation, therefore, there will be no impairment to vegetation.
- Wildlife – Based on ecological surveys, SAAN is known to be home for 311 species of wildlife. Wildlife will be impacted by the preferred alternative during both the operation and implementation of the alternative. Using the above criteria, wildlife are a resource that is key to the natural integrity of the park. Generally, the species found within the park are considered common, and tolerant of moderate amounts of disturbance and which could use other areas of the local habitats without having much of an adverse effect on the population. The preferred alternative will result in adverse, short- and/or long-term, site-specific moderate impacts to wildlife, therefore, there will be no impairment to wildlife.
- Cultural Landscapes – SAAN was created in order to provide for the preservation, restoration, and interpretation of the Spanish Missions of San Antonio, Texas, to ensure benefit and enjoyment for the present and future generations. The implementation of the preferred alternative will further contribute to the cultural landscape by creating a demonstration farm that will re-establish the labores and provide a mechanism for enhancing visitor interpretational, educational, and recreational opportunities. The preferred alternative will have beneficial, local, long-term, moderate impact on the cultural landscape, as this is beneficial impact, there will be no impairment to the cultural landscape.
- Historic Structures and Districts – Mission San Juan was entered into the National Register in 1972. The mission is included in the Mission Parkway Historic/Archeological National Register District. The implementation of the preferred alternative will enhance contributing features. The preferred alternative will have a beneficial local, long-term, and moderate

impact on historic buildings and the district, as this is beneficial impact, there will be no impairment to the historic structures and the district.

- Archeological Resources – Many archeological investigations have been conducted at Mission San Juan including a pedestrian survey of the project area. These investigations have added valuable information to the archeological record of the area. The implementation of preferred alternative will result in either adverse or beneficial, site-specific or local, short- and/or long-term, and minor to moderate impacts on archeological resources. Adverse impacts will result from potential construction and operational disturbances and beneficial impacts could result from the contributions that any sub-surface archeological discoveries could make to archeological record of the Spanish colonial period. There will be no impairment to archeological resources.

In addition, as discussed in the mitigation section of the Environmental Assessment, mitigation measures for these resources will further lessen the degree of impact and help promote the protection of these resources.

In conclusion, as guided by this analysis, good science and scholarship, advice from subject matter experts and others who have relevant knowledge and experience, and the results of public involvement activities, it is the Superintendent's professional judgment that there will be no impairment of park resources and values from implementation of the preferred alternative.