

# **Appendix H: Finding of No Significant Impact**

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## **Finding of No Significant Impact**

### ***Cesar Chavez Special Resource Study* Environmental Assessment**

#### **California and Arizona**

**December 2011**

### **Introduction**

The Consolidated Natural Resources Act of 2008 (P.L. 110-229, May 2008) authorized the National Park Service to conduct a special resource study of sites that are significant to the life of Cesar Chavez and the farm labor movement in the western United States. This legislation was sponsored by former Congresswoman Hilda L. Solis, from the Los Angeles, California area and Senator John McCain of Arizona, with numerous co-sponsors, including former Senator Kenneth Salazar of Colorado, Senator Barbara Boxer of California, and sixty-nine co-sponsors in the House from California, Arizona, Texas, and throughout the nation.

The overall purpose of this study is to evaluate the significance and suitability of sites significant to Cesar Chavez and the farm labor movement, and the feasibility and appropriateness of a National Park Service (NPS) role in the management of any of these sites. Through the study process, the NPS identified alternative strategies to manage, protect, or restore the resources, and to provide or enhance public use and enjoyment. This study will provide information to aid Congress, the U.S. Department of Interior, and the NPS in determining whether designation of a unit of the national park system is desirable and appropriate. The legislation authorizing this study specifically directs the NPS to determine appropriate methods for preserving and interpreting the sites, and whether any of the sites meet the criteria for listing on the National Register of Historic Places or for designation as a national historic landmark.

This Finding of No Significant Impact (FONSI) documents the determination of the National Park Service (NPS) that resources evaluated through this study are nationally significant, suitable, feasible and appropriate for NPS management; the selection of the most effective and efficient alternative; and the determination that there are no associated significant impacts on the human environment.

### **Purpose and Need**

The purpose of this study is to comply with the Consolidated Natural Resources Act of 2008 (P.L. 110-229) which directed the Secretary of the Interior to conduct a special resource study of sites that are significant to the life of Cesar Chavez and the farm labor movement in the western United States.

The special resource study followed the process established by the National Park System New Area Studies Act (P.L. 105-391, 16 U.S.C. Sec. 1a-5). This law requires that these studies be prepared in compliance with the National Environmental Policy Act (NEPA). At the beginning of the study process, the NPS initiated a notice of scoping that was published in the Federal Register on May 17, 2011. Through the initial public scoping process, the NPS identified a range of issues to address through the study and impacts of concern to the public.

This study is needed to provide the Secretary of the Interior and Congress with information on the sites and resources associated with Cesar Chavez and the farm labor movement. It identifies and analyzes alternatives for the

management, administration, and protection of those sites and resources, and evaluates their appropriateness for becoming a unit of the national park system.

## **Study Area**

The study evaluated over 100 sites in California and Arizona related to Cesar Chavez and the farm labor movement. The NPS partnered with the Center for Oral and Public History at California State University, Fullerton (COPH) to identify sites significant to Cesar Chavez and the farm labor movement and to evaluate their significance. COPH faculty and students developed a preliminary list of 84 sites based on information obtained through personal interviews, books and essays written in the 1960s and 1970s, declassified FBI surveillance files, newspapers, and photographs. They then conducted site visits to determine current conditions and integrity of the sites. The research team noted in their report the challenges of documenting sites associated with transitory events and activities (such as marches or picket lines). They observed that many sites associated with important events have changed dramatically in the years since the events, and therefore retain less historic integrity. Additional sites were identified through public scoping comments. Chapter 2, *Historical Overview and Resources*, and Chapter 3, *Significance* in the Special Resource Study provide more information on the sites and the analysis of their significance.

## **Evaluation of Significance**

Cesar Chavez and the farm labor movement are nationally significant. Cesar Chavez is recognized as the most important Latino leader in the history of the United States during the twentieth century. The national significance of the farm labor movement stems, in part, from its creation of the United Farm Workers union (UFW), the first permanent agricultural labor union in the history of United States. In addition to Cesar Chavez, noted farm labor leaders such as Dolores Huerta and Larry Itliong played key leadership roles in forming the UFW.

### **NATIONALLY SIGNIFICANT SITES MEETING NATIONAL HISTORIC LANDMARK CRITERIA**

The NPS found that five sites associated with Cesar Chavez and the farm labor movement are nationally significant meeting national historic landmark (NHL) criteria.

**The Forty Acres NHL (Delano, CA)** - The National Farmworkers Service Center acquired this property in 1966, and this organization and its successors proceeded to build a service station, multipurpose hall, health clinic, and retirement housing. Cesar Chavez conducted his 1968 fast in the service station building, and his 1988 fast in the retirement village. The United Farm Workers Organizing Committee was headquartered at the Forty Acres from 1969-71, and the contracts that ended the 1966-70 strike against Delano-area growers were signed here. Many public events and rallies were based at the Forty Acres. As a property purchased, built, and used by farm workers, the Forty Acres embodies the farm labor movement itself. Forty Acres was designated a National Historic Landmark in 2008. It continues to function as a United Farm Workers (UFW) field office.

**Filipino Community Hall (Delano, CA)** - The Filipino Community Hall represents the nationally significant role of Filipino Americans in the farm labor movement. On September 8, 1965, Filipino American farm workers led by Larry Itliong and affiliated with the AFLCIO's Agricultural Workers Organizing Committee (AWOC) gathered in this building and voted to go on strike against Delano table-grape growers. When members of the National Farm Workers Association (NFWA) voted to join the AWOC strike eight days later the Filipino Hall became the joint strike headquarters. The hall hosted important visits by United Auto Workers' President Walter Reuther, Senator Robert F. Kennedy, and other influential supporters, and became a symbol of the farm labor movement's multi-racial unity during the 1960s.

**Nuestra Senora Reina de La Paz (Keene, CA)** - Between 1970 and 1984, the farm labor movement transitioned into a modern labor union, the UFW. This union secured unprecedented gains during these years which were closely associated with La Paz. The property supported not only the UFW headquarters and Cesar Chavez's residence, but also the thousands of union members who came to La Paz to help devise organizing strategies, to receive training, and to strengthen their sense of solidarity. Upon his death in 1993, Chavez was buried at La Paz. La Paz was listed on the national register of historic places in August 2011 and has been recommended as an NHL by the National Historic Landmarks Committee.

**Santa Rita Center (Phoenix, AZ)** - Cesar Chavez's fast at the Santa Rita Center focused national attention on farm workers and their organized protest against restrictive legislation, and it invigorated two social movements—the Chicano movement and the farm labor movement. Ultimately it reshaped the political landscape in Arizona and beyond. Thousands of Arizona farm workers, and influential supporters such as Coretta Scott King, came to the Santa Rita Center to participate in rallies, celebrate nightly Masses, give voice to the movement's newly adopted slogan "Si Se Puede!" and pledge their support for *La Causa*. The Arizona campaign that grew out of Cesar Chavez's fast at the Santa Rita Center marked the beginning of an era in which the union would have a direct role in shaping politics and policies that affected farm workers across the nation.

**1966 March Route (Delano to Sacramento, CA)** - This march was a milestone event in the history of the farm labor movement. More than one hundred men and women set out from Delano on March 17, 1966, and thousands of farm workers and their families joined in for short stretches along the way. The march route passed through forty-two cities and towns of the San Joaquin Valley, as well as vast stretches of the agricultural landscape. By the time the marchers entered Sacramento on Easter Sunday, April 10, 1966, the farm worker movement had secured a contract and attracted new waves of support from across the country.

#### **NATIONALLY AND POTENTIAL NATIONALLY SIGNIFICANT SITES – ADDITIONAL RESEARCH NEEDED**

An additional 11 sites were determined to have national significance or potential national significance; however more research is needed to fully evaluate whether these sites meet NHL criteria, particularly with regard to integrity. Although some of the 11 appear to have less than a high degree of integrity, the NPS found that they offer exceptional interpretive value in conveying the story of Cesar Chavez and the farm labor movement, and therefore may be appropriate for inclusion in a national park unit. These sites include:

- McDonnell Hall, Our Lady of, Guadalupe Church (San Jose, CA)
- Monterey County Jail (Salinas, CA)
- St. Mary's Catholic Church (Stockton, CA)
- Cesar and Helen Chavez Family Residence (Delano, CA)
- Baptist Church ("Negrito Hall") (Delano, CA)
- NFWA Office (Albany Street) (Delano, CA)
- People's Bar and Café (Delano, CA)
- Arvin Farm Labor Center (Bakersfield, CA)
- UFW Field Office ("El Hoyo") (Calexico, CA)
- Chavez Family Homestead Site (Yuma, AZ)
- UFW Field Office (San Luis, AZ)

The authorizing legislation for the study called for the identification of sites eligible for nomination to the national register of historic places. An additional 24 sites in California and Arizona were determined to be eligible for nomination to the national register of historic places.

#### **Evaluation of Suitability**

Based on the analysis of comparable resources and interpretation already represented in units of the National Park System, or protected and interpreted by others, this study concludes the sites associated with Cesar Chavez and/or the farm labor movement in the American West depict a distinct and important aspect of American history associated with civil rights and labor movement that is not adequately represented or protected elsewhere and are therefore suitable for inclusion in the National Park System.

## **Evaluation of Feasibility**

The feasibility analysis focused on the five sites that have been found eligible for national historic landmark designation and the eleven sites that are nationally significant or potentially nationally significant, needing further research.

**Boundary Size and Configuration:** The historically significant sites and march route each provide for the inclusion and protection of the primary resources; they include sufficient surrounding area to provide a proper setting for the resources; and they offer sufficient land for appropriate use and development, if needed.

**Land Use, Ownership Patterns, Planning and Zoning:** Current land uses, land ownership patterns, and planning and zoning would all support a range of NPS and partnership management approaches. Designation of a collaborative national park unit that works with property owners and local communities to protect the resources and provide public access, interpretation, education and other uses could be compatible with existing ownership patterns.

**Access and Public Enjoyment Potential:** There is potential for public access and enjoyment among the historically significant sites and march route. Most sites are easily accessible from public roads, on major state or federal highways, and within a half a day's drive of major metropolitan areas. There are opportunities for a variety of visitor experiences at the sites and along the march route, and ample potential for development of additional visitor use opportunities.

**Existing Resource Degradation and Threats to Resources:** Despite resource degradation and threats to a few sites, most sites contain resources of high integrity. These sites are not subject to resource degradation or threats that would preclude management as a unit of the national park system.

**Public Involvement and Support:** Significant public interest and support has been expressed during public scoping for the NPS to play a collaborative role in one or more nationally significant sites in partnership with other organizations and local communities. Organizations that own the Forty Acres, Filipino Community Hall, Nuestra Senora Reina de la Paz, the Santa Rita Center and McDonnell Hall have indicated their interest in partnerships with the NPS.

**Social and Economic Impact:** The social and economic impacts of NPS designation or other support/coordination role appear to be largely beneficial and would support the feasibility of NPS designation.

**Costs Associated with Operation, Acquisition, Development and Restoration:** Costs for establishing a national park unit appear to be feasible, provided that partnership opportunities are pursued to support collaborative operations and development.

Based on the above analysis, a partnership-based national park unit or technical assistance program which provides opportunities for collaborative management to protect cultural resources, provide public access, interpretation, and educational opportunities at certain sites associated with the life of Cesar Chavez and the farm labor movement is a feasible addition to the National Park System.

## **Alternatives Analyzed**

Five alternatives were analyzed in the Cesar Chavez Special Resource Study. The alternatives are based on the purpose and need for the project and are consistent with existing laws, NPS policy and the special resource study legislation.

**ALTERNATIVE A: NO ACTION (CONTINUATION OF CURRENT MANAGEMENT)**

Sites, organizations, and programs significant to the life of Cesar Chavez and the farm labor movement would continue to operate independently without additional NPS management or assistance other than that available through existing authorities. Current programs and policies of existing federal, state, county and nonprofit organizations would remain in place. Significant sites would continue to be owned and managed by their respective public and private owners. There would be no NPS staffing or operational support other than assistance under existing authorities if requested.

**ALTERNATIVE B: NATIONAL NETWORK OF SITES AND PROGRAMS RELATED TO CESAR CHAVEZ AND THE FARM LABOR MOVEMENT**

Congress would establish a national network to facilitate preservation and education efforts related to the life of Cesar Chavez and the farm labor movement. The program would consist of an integrated network of historic sites, museums and interpretive programs, coordinated with national, regional and local organizations. Significant sites, museums, and interpretive programs related to Cesar Chavez and the farm labor movement in the western United States would be eligible to participate in a national network.

The NPS would administer the national network to focus on:

1. Education about the historic significance of the life of Cesar Chavez and the farm labor movement;
2. Technical assistance to organizations that identify, document, preserve and interpret significant sites or that develop or operate interpretive or educational programs or facilities;
3. Matching grants for research, preservation efforts, and interpretive programs; and
4. Coordination of network sites, programs and facilities.

The NPS would evaluate sites and programs nominated for inclusion in the network for their association to the life of Cesar Chavez and the farm labor movement based on established criteria. Elements of the network, such as historical sites and museums, would continue to be owned and managed by their respective public and private owners.

**ALTERNATIVE C: NATIONAL HISTORIC TRAIL FOLLOWING THE ROUTE OF THE 1966 MARCH FROM DELANO TO SACRAMENTO**

Congress would establish a new national historic trail (NHT) as a unit of the national trails system. The trail would commemorate the 1966 Delano to Sacramento march route. It would follow the historic route, recognizing associated historic resources significant to the life of Cesar Chavez and the farm labor movement for public use and enjoyment. The NHT would include approximately 300-miles of primary and secondary roads that traverse towns through which farm workers marched from Delano to Sacramento in 1966.

The NPS would administer trail-wide coordination of the NHT. NPS responsibilities would include facilitating coordination among and between agencies and partner organizations. The trail right-of-way would continue to be owned by its respective public and private owners.

Through partnership with owners and other interested parties, the NPS would engage in planning and marking the NHT; certifying qualifying segments as protected; supporting voluntary resource preservation and protection; and assisting with interpretation, educational programs, and visitor enjoyment along the trail route.

The NHT could include a visitor facility in Delano (at the Forty Acres or Filipino Community Hall). All visitor facilities developed to interpret and assist visitors along this proposed trail would be established through partnership agreements.

**ALTERNATIVE D: NATIONAL HISTORIC SITE FOCUSING ON THE FORTY ACRES SITE IN DELANO**

Congress would establish a national historic site (NHS) as a unit of the national park system. The NHS would preserve and interpret resources significant to the life of Cesar Chavez and the farm labor movement at the Forty

Acres in Delano, California. The NHS would include the 40 acres that comprise the Forty Acres National Historic Landmark.

The NPS would have primary responsibility for: 1) overall interpretation and education associated with the national historic site and its resources, including the development of interpretive media and programs; 2) community outreach and assistance in training of park volunteers in association with local organizations; and 3) technical assistance for resource preservation efforts for both the historic site and community-based resources in Delano, CA.

The NPS would manage the Forty Acres in partnership with the Chavez Foundation and the UFW, through management agreements for historic preservation, interpretation, and educational programs. The NPS would provide staffing to manage a visitor facility or education center, interpretive exhibits, and educational programs at the Forty Acres.

The legislation would provide the NPS with authorization to acquire the Forty Acres should the existing owners wish to donate or sell the property at some future time. Significant sites other than the Forty Acres would continue to be owned and managed by their respective public and private owners.

### **ALTERNATIVE E: NATIONAL HISTORICAL PARK INCORPORATING NATIONALLY SIGNIFICANT SITES IN CALIFORNIA AND ARIZONA**

Congress would establish a national historical park (NHP) as a unit of the national park system. The national historical park would consist of nationally significant sites in California and Arizona related to the life of Cesar Chavez and the farm labor movement including the Forty Acres, Filipino Community Hall, Nuestra Senora Reina de La Paz (La Paz), and the Santa Rita Center.

The Secretary of the Interior would be authorized to add significant associated sites or districts to the national historical park. These sites would likely be owned and operated by park partners.

The NPS would have primary responsibility for: 1) overall interpretation and education associated with the national historical park sites, including the development of interpretive media and programs; 2) community outreach and assistance in training of volunteers in association with local organizations; and 3) technical assistance for resource preservation efforts for associated sites.

The NPS would work cooperatively with the owners of sites within the national historical park to preserve resources and provide appropriate opportunities for the public to learn about the life of Cesar Chavez and the broader farm labor movement. The NPS role could vary at each site, and could include staffing, visitor programs, and assistance with cultural resource protection. The NPS could enter into management agreements with public and private owners of park sites for historic preservation, interpretation, and education.

Associated sites significant to the life of Cesar Chavez and the farm labor movement could be later added to the national historical park. The NPS would develop a process for adding associated sites to the national historical park. Criteria would include significance of the site or district to the life of Cesar Chavez or the farm labor movement, local commitment to preservation of the site or district, and the ability to offer interpretive opportunities or educational programs. Associated sites would be owned and managed by park partners. The NPS could provide technical assistance and grants to associated sites to establish visitor facilities, interpretive exhibits, and educational programs.

### **Alternatives Considered But Dismissed**

Pursuant to the National Environmental Policy Act (NEPA) and NPS policy, alternatives may be eliminated from detailed study based on the following reasons [40 CFR 1502.14 (a)]:

1. Technical or economic infeasibility;
2. Inability to meet project objectives or resolve need for the project;
3. Duplication of other less environmentally damaging alternatives;
4. Conflicts with an up-to-date valid plan, statement of purpose and significance, or other policy; and therefore, would require a major change in that plan or policy to implement; and
5. Environmental impacts too great.

Two preliminary alternatives were considered during the scoping phase but were dismissed. These alternatives included: a national heritage area encompassing the major agricultural valleys of California and Arizona, and a national historic trail that would connect the major communities with sites significant to Cesar Chavez and the farm labor movement (see Chapter 6 in the EA). These alternatives were dismissed because the areas do not fully meet NPS criteria for national heritage area or national historic trail designation.

## **The Selected Alternative**

The National Park Service special resource study process requires that the study identify the alternative or combination of alternatives that in the professional judgment of the NPS Director is most effective and efficient in protecting significant resources and providing for visitor enjoyment. Based on public and stakeholder input and professional judgment, the NPS selected the national historical park (from alternative E), incorporating aspects of the national network (from alternative B). The National Park Service has determined this to be the most effective and efficient alternative in protecting significant resources and providing for visitor enjoyment.

The actions encompassed in the selected alternative are the same as those identified and analyzed in alternatives E and B in the environmental assessment, with the exception of minor modifications made as a result of information and comments derived from public review of the EA, as follows:

- The national historical park would include McDonnell Hall in San Jose, CA. McDonnell Hall appears to be the best location to tell the story of Cesar Chavez's early education as a community organizer. There is significant support by the site owner and local community for this site to be included in a national historical park.
- The selected alternative does not include the provision for adding "associated sites," to the national historical park as was presented in alternative E, but does provide for the establishment of a national network where the NPS would coordinate a network of sites and programs outside of the park related to Cesar Chavez and the farm labor movement.
- The NPS would establish an oral history program with park partners or universities to further document the story of Cesar Chavez and the farm labor movement.

The above modifications would not constitute a change in environmental impacts beyond what was analyzed in the environmental assessment. The modifications would generally assure beneficial effects on the resources associated with Cesar Chavez and the farm labor movement. The following is the full description of the selected alternative.

### **CONCEPT**

Congress would establish a national historical park (NHP) as a unit of the national park system. The NHP would initially include the Forty Acres, Nuestra Senora Reina de la Paz, Filipino Community Hall, the Santa Rita Center, and McDonnell Hall. Most park sites would remain in existing ownership, although NPS land acquisition would be authorized. Management would occur through collaborative processes such as cooperative agreements, memoranda of understanding, and other partnership approaches to protecting and interpreting resources owned by partners. The NPS would have primary responsibility for overall interpretation and education, and would provide technical assistance in preservation of park sites. The NPS would also work beyond NHP boundaries to facilitate oral histories, research and recognition of other related historic sites, and to establish a voluntary national network of sites and programs that tell the story of Cesar Chavez and the farm labor movement to help preserve resources and tell important stories outside of the national historical park.

### **PROPOSED AREA**

The national historical park would initially include lands and historic structures associated with the Forty Acres (Delano, CA), Nuestra Senora Reina de la Paz (Keene, CA), Filipino Community Hall (Delano, CA), the Santa Rita Center (Phoenix, AZ), and McDonnell Hall (San Jose, CA).

As part of an initial management plan for the national historical park, the NPS would evaluate additional significant sites that represent key events and geographic regions and recommend any other sites that should be added to the

national historical park to fully reflect the story of Cesar Chavez and the farm labor movement. The potential for designation of the 1966 Delano to Sacramento march route as a national historic trail would also be further explored.

## **MANAGEMENT**

NPS ownership of these sites is not required for management as a national historic park. Management would occur through collaborative processes such as management agreements, memoranda of understanding, and other partnership approaches to protecting and interpreting resources owned by partners. Within the NHP, the NPS would have primary responsibility for: 1) overall interpretation and education associated with the national historical park sites, including the development of interpretive media and programs; and 2) technical assistance in preservation of park sites.

The NPS would work cooperatively with the owners of sites within the national historical park, through management agreements and other mechanisms, to preserve historic resources and provide appropriate opportunities for the public to learn about the life of Cesar Chavez and the broader farm labor movement. The NPS role could vary at each site, and could include visitor programs and assistance with cultural resource protection. The legislation establishing the park would provide the NPS with authorization to acquire sites within the national historical park that meet national historic landmark criteria should the existing owners express interest in donating or selling their properties if funding is available.

Beyond the NHP, the NPS would have the responsibility for: 1) development of a voluntary national network of sites and programs that tell the story of Cesar Chavez and the farm labor movement. outside of the national historical park; 2) research and documentation of significant sites and stories, including development of an oral history program and assistance with nomination of properties to the National Register of Historic Places or as National Historic Landmarks; and 3) development of interpretive routes, including working with interested organizations to mark, interpret and preserve elements of the 1966 Delano to Sacramento march route.

## **RESOURCE PROTECTION**

Within the NHP, the NPS would allocate park staff and apply existing NPS grant programs to work with partners to conduct research and preserve historic structures, landscapes and artifacts associated with the historical park sites. The NPS could also assist partners to identify and leverage outside funding for preservation. Beyond the NHP, the NPS would work with interested organizations to determine eligibility for National Historic Landmark status or listing on the National Register of Historic Places for sites that appear to be nationally significant but need further research. The NPS would establish an oral history program with park partners or universities to further document the story of Cesar Chavez and the farm labor movement.

## **VISITOR EXPERIENCE**

Visitors would have the opportunity to learn about all aspects of the life of Cesar Chavez and the farm labor movement through key historical park sites in California and Arizona. The NPS would work with park partners to develop educational and interpretive media and programs (e.g. walking tours, ranger-led tours, waysides, school curriculums, exhibits, and hands-on programs such as working in the fields). The NPS could work with partner organizations and agencies to interpret march routes. For example, signage and an auto tour route could be created to interpret the 1966 Delano to Sacramento march route.

A management plan would determine which historic structures could best be used for a visitor center, education/research facility and other potential visitor uses. Opportunities for visitor facilities exist at the current visitor center at the National Chavez Center at La Paz, and historic structures at the Forty Acres. Visitor displays could also be offered at other national historical park sites such as the Filipino Community Hall, the Santa Rita Center, or McDonnell Hall in partnership with existing owners.

Network sites could provide visitor interpretation and education related to the significant events which occurred in these locations. A virtual visitor center could use emergent technologies to provide information about the Cesar Chavez and farm labor movement stories.

## **OPERATIONS AND MAINTENANCE**

**Staffing.** The national historic park would be staffed initially by a small core staff, potentially shared with other parks, and supplemented over time by additional staff as funding became available. A management plan would identify park priorities, management emphases, and required staffing for a 15 to 20 year timeframe.

Based on comparisons of staffing levels for existing national historic parks of similar scale, the following types of staff might be recommended:

- Superintendent
- Community planner
- Interpretive specialists (2)
- Cultural resource specialists (2)
- Interpretive park rangers (4)
- Visitor use assistants (2)
- Education program specialist

Some positions might be seasonal, temporary, or shared with nearby parks. In addition, partner organizations would likely retain staff, with types and numbers dependent on the functions provided by these partners. Types of partner functions might include staffing a visitor facility or museum, and developing and implementing educational programs. If the NPS acquired any of these sites, maintenance staff would be required to maintain the historic structures and visitor facilities.

## **LAND ACQUISITION**

### **National Historical Park Sites**

NPS ownership of the park sites is not required for the NPS to manage the area as a national historic park. The NPS could operate in partnership with the current landowners through management agreements. Legislation would provide the NPS with authorization to acquire park sites that meet national historic landmark criteria should the existing owners wish to donate or sell these properties, if land acquisition funding is available.

### **Network Sites**

All facilities, sites and programs participating in the national network would remain under their existing ownership and management. Participating in the network would be completely voluntary on the part of the participants.

## **OPERATIONAL AND VISITOR FACILITIES**

Construction of new administrative and visitor facilities for NPS operations and management would not likely be required to support the national historic park. However, some alterations to the site circulation (e.g. trails, parking, roads, exhibits) would likely occur. The NPS could share administrative and operational facilities with partner organizations, or adaptively reuse historic structures.

## **FUNDING AND COSTS**

NPS management of a national historic park would be funded through federal appropriations as part of the annual NPS budget. While no formal estimates of operating costs have been completed for this study, the NPS operational base budgets for fiscal year 2010 of several national historic parks that illustrate the potential range. Based on the size and scope of this park, and the types of services and assistance proposed, the annual cost of NPS operations for the network could be expected to be \$1 million to \$3 million. The estimated operational budget would primarily fund NPS staff, interpretive and education programs, and outreach.

If a national historical park is designated by Congress, it is likely that funding for the new unit would start at a low level and grow slowly over time. Many of the activities described in the alternative would have to be phased in as funding and staffing allows, and it may be many years before the park is fully operational as described.

## **Environmentally Preferable Alternative**

The NPS has determined the selected combination of alternatives B and E to be the environmentally preferable course of action. These actions would protect the largest number of resources potentially eligible as NHLs, including opportunities for protection in perpetuity should current owners choose to donate or sell the properties to NPS in the future.

## **Why the Selected Alternative Will Not Have a Significant Effect on the Quality of the Human Environment**

The NPS has determined that the selected alternative can be implemented with no significant adverse effects on land use; water resources; vegetation; wildlife; federally listed species; prehistoric and historic archeological resources; historic structures / cultural landscapes; museum collections; visitor experience; or socioeconomics.

As defined in 40 CFR §1508.27, significance of impacts is determined by examining the ten criteria below.

### **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.**

The NPS evaluated the potential environmental consequences of each alternative related to the following topics: land use; water resources (water quality and hydrology); vegetation; wildlife; federally listed species; prehistoric and historic archeological resources; historic structures / cultural landscapes; museum collections; visitor experience; and socioeconomics. A range of minor impacts and beneficial effects is associated with the selected alternative (combination of alternatives B and E to be recommended).

Environmental effects would generally be beneficial. The effort to protect sites associated with Cesar Chavez and the farmworker network through the national historical park and the national network would result in long-term beneficial effects on historic structures, cultural landscapes, and museum collections. There would be long-term beneficial effects on visitor access, with specific trips generated to visit the national historical park sites. The network program and historical park would provide beneficial effects on visitor opportunities through engendering a better understanding of these events for all Americans as well as international visitors. The national historical park and network would provide for a centralized national location for information about Cesar Chavez and the farm labor movement.

### **THE DEGREE TO WHICH THE PROPOSED ACTION AFFECTS PUBLIC HEALTH OR SAFETY.**

The selected alternative will not adversely affect public health or safety. Impacts on safety would primarily be beneficial from establishment of an NPS unit because NPS standard safety policies and guidelines would be employed and would be used to minimize risk. Because no specific risks associated with the alternatives were identified, this topic was dismissed from additional environmental analysis.

**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.**

There are no designated wetlands, prime farmlands, park lands, wild and scenic rivers, or ecologically critical areas in the area that could be affected by implementation of the selected alternative. These topics were dismissed from additional environmental impact analysis.

Cultural resources related to Cesar Chavez and the farm labor movement were the focus of this study. The actions associated with the selected alternative would result in long-term beneficial effects on the preservation of these resources where these were part of the national historical park.

**THE DEGREE TO WHICH EFFECTS ON THE QUALITY OF THE HUMAN ENVIRONMENT ARE LIKELY TO BE HIGHLY CONTROVERSIAL.**

There were no highly controversial effects identified during either initial public scoping or preparation of the environmental assessment. Moreover, no highly controversial comments or concerns were received during the public review period.

**THE DEGREE TO WHICH THE POSSIBLE EFFECTS ON THE QUALITY OF THE HUMAN ENVIRONMENT ARE HIGHLY UNCERTAIN OR INVOLVE UNIQUE OR UNKNOWN RISKS.**

There were no highly uncertain, unique or unknown risks identified during either preparation of the environmental assessment or the public review period.

**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 selected alternative neither establishes an NPS precedent for future actions with significant effects nor represents a decision in principle about a future consideration. A park unit that encompasses multiple sites in different states is not precedent setting. Similar parks already exist in the national park system. Among these include Nez Perce National Historical Park in Idaho, Montana, Oregon and Washington and Klondike Gold Rush National Historical Park in Washington and Alaska.

**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.**

Other past, present, or reasonably foreseeable actions were analyzed for their potential to contribute to cumulative impacts in association with implementation of the selected alternative. These included past development in the vicinity of the historically significant sites as well as ongoing or proposed projects associated with the Phoenix Sky Harbor Airport, La Paz Master Development Plan, expansion of the Burlington Northern and Santa Fe Railroad, Route 99 Corridor Enhancement Master Plan, Santa Rita Center, Old Monterey County Jail, Chavez Family Homestead site, and Filipino Community Hall.

Although these projects would contribute or have contributed to cumulative effects, the overall cumulative effect for most resources would be beneficial from the preservation of historic sites related to the life of Cesar Chavez and the farm labor movement. There would also be a combination of negligible to minor cumulative adverse effects related to the proposed development projects noted above. Overall, the predominately beneficial impacts of the selected alternative, combined with the negligible to major adverse impacts from other past, present, and reasonably

foreseeable future actions, would result in a minor to moderate cumulative adverse effect. The adverse and beneficial effects of the selected alternative would comprise a very small component of these cumulative impacts. There would be no significant cumulative impacts from implementation of the selected alternative.

**THE DEGREE TO WHICH THE ACTION MAY ADVERSELY AFFECT DISTRICTS, SITES, HIGHWAYS, STRUCTURES, OR OBJECTS LISTED IN THE NATIONAL REGISTER OF HISTORIC PLACES OR MAY CAUSE LOSS OR DESTRUCTION OF SIGNIFICANT SCIENTIFIC, CULTURAL, OR HISTORIC RESOURCES.**

Because the selected alternative calls for inclusion of nationally significant sites associated with Cesar Chavez and the farm labor movement in a national historical park, these sites would likely retain a high degree of integrity and would benefit from partnership preservation opportunities with the NPS through technical assistance or other means. Designation as a park site would facilitate better protection of historic structures and cultural landscapes. These sites would have additional recognition as part of a national park unit and from NPS involvement and would therefore be able to obtain additional operations, grant and donor assistance or contributions. For network sites there could be long-term beneficial effects, including improved treatment of historic structures from NPS technical assistance and from successful procurement of funding and/or grants for rehabilitation of historic characteristics.

Although it is likely that there would still continue to be a wide range of adverse and beneficial effects on sites that were not designated as part of the national historical park, overall protection of Cesar Chavez and farm labor movement sites would be improved as part of the selected alternative. There would be no adverse effect or no effect on historic structures or identified cultural landscapes within the area of potential effect as a result of implementation of the selected alternative.

**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.**

The selected alternative would have no effect on endangered or threatened species or habitat.

**WHETHER THE ACTION THREATENS A VIOLATION OF FEDERAL, STATE, OR LOCAL LAW OR REQUIREMENTS IMPOSED FOR THE PROTECTION OF THE ENVIRONMENT.**

The selected alternative would not violate federal, state, or local environmental protection laws.

## **Public Engagement**

### **PUBLIC SCOPING**

The NPS launched public scoping for this study in spring of 2011. In April 2011 the study team produced and distributed, mailed or emailed 1,900 newsletters to individuals, organizations, government officials and the media. The newsletter was also made available for comment on the study website and on the NPS's Planning, Environment and Public Comment (PEPC) website. Newsletters were available in English and Spanish.

The purpose of this newsletter was to introduce the study, explain the process to community members and others, and solicit comments on issues the study should address. The newsletter also contained information on the schedule of public scoping meetings.

Press releases announcing the beginning of the study process and the public meeting schedule were distributed to local media. Numerous articles and opinion pieces about the study were published in area newspapers and presented on television and radio.

All information sent by mail or e-mail has also been available on the study website site at [www.nps.gov/pwro/chavez](http://www.nps.gov/pwro/chavez). Updates and information about the study process were also made available on the study's Facebook page at [facebook.com/chavezstudy](https://facebook.com/chavezstudy).

In May 2011, the study team held a series of public scoping meetings in California and Arizona. Included in the agenda was a presentation on the purpose and study process, sites associated with Cesar Chavez and the farm labor movement, and potential management ideas and outcomes. After the presentation the NPS facilitated group discussions so that participants could discuss their vision for recognizing the life of Cesar Chavez and the farm labor movement and to identify any additional sites that should be considered in the study.

Public scoping meetings were held in San Jose, Salinas, Los Angeles, Oxnard, Coachella, Delano, (CA), and Phoenix and Yuma (AZ), and were attended by approximately 240 people. Spanish translation was available at all meetings. The study team also consulted with representatives of the Cesar E. Chavez Foundation, the Filipino Community of Delano, Inc., the United Farm Workers of America, the Chavez Family Vision, Chicanos Por La Causa, former participants in the farm labor movement and numerous local, state and federal government officials.

A 30 day opportunity for public comment extended to June 16, 2011, however, comments received after this date were also considered. In addition to comments received at the public scoping meetings, the NPS received approximately 65 comments via written letters and through e-mail during public scoping.

Public scoping comments indicated a strong interest in national recognition of Cesar Chavez and the farm labor movement by the National Park Service. The NPS also received information about additional sites to consider in the study report. It was important to many commenters that the story be told from multiple perspectives and be accessible to multiple generations. Many wanted to see other important farm labor leaders recognized, not just Cesar Chavez. Specific ideas for a national park unit that would tell the story of Cesar Chavez and the farm labor movement included opportunities to link multiple sites via trails, tour routes, or marking of the march routes. Many were interested in protecting archives and providing visitor centers and/or museums where people can go to learn about the farm labor movement. Some commenters expressed interest in NPS technical assistance or grants for preserving historic structures and sites.

## **PUBLIC REVIEW OF SPECIAL RESOURCE STUDY**

In October 2011 the study team produced and distributed the *Draft Cesar Chavez Special Resource Study and Environmental Assessment* to elected officials, government entities, organizations and individuals for review and comment. Approximately 555 copies of the draft study report and 2,500 copies of the newsletter were distributed through mail, email and at public meetings.

Eight public meetings were held between October 20, 2011 and November 10, 2011 in San Jose, Salinas, Delano, Coachella, Oxnard, Los Angeles, (CA) and Phoenix and Yuma (AZ) to present the draft study report and solicit public comments. A total of 170 people attended the meetings. The NPS presented the study process and criteria used in the study, discussed the study results, and solicited comments. Copies of the draft study report were made available and participants were encouraged to submit comments by mail or through the PEPC website. The comment period ended November 14, 2011. In addition to comments received at the public meetings, 60 written comments on the draft study report were received.

The NPS also consulted with individuals and representatives of various organizations and government entities, including the Cesar E. Chavez Foundation, the Filipino Community of Delano, Inc., the United Farm Workers of America, the Chavez Family Vision, Chicanos Por La Causa, former participants in the farm labor movement and numerous local, state and federal government officials.

## **Public Comment Summary**

Generally, public comments were in favor of a national park unit commemorating Cesar Chavez and the farm labor movement, although a few comments questioned the need for NPS management. No opposition was expressed to the establishment of a national park unit. The majority of comments supported alternative E, the national historical park. Many others supported alternative E in combination with the network concept from alternative B and/or inclusion of the 1966 Delano to Sacramento march route as a national historic trail. Support for alternative E primarily reflected the belief that no single site could adequately represent the broad scope of farm labor history or the legacy of Cesar Chavez. Comments expressed an understanding that multiple sites represent a critical parts of the story, and that the farm labor movement involved the effort and support of multiple people. Other comments stressed the importance of having historic sites close to where people live and where events took place.

Additional sites recommended for inclusion in the national historical park included the Monterey County Jail in Salinas, CA; McDonnell Hall in San Jose, CA; and the UFW Office (El Hoyo) in Calexico, CA. McDonnell Hall has been included as a national historical park site in the selected alternative. More information is needed regarding national significance and local support for participation in a national historical park before the Monterey County Jail and El Hoyo could be considered as national historical park sites.

The NPS also received comments related to the significance of specific sites considered in the study. Many organizations, individuals and elected officials suggested that additional sites be recognized as national historic landmarks including McDonnell Hall in San Jose, CA; Monterey County Jail in Salinas, CA; El Teatro Campesino in San Juan Bautista, CA; the Mexican Heritage Plaza in San Jose, CA; the Chavez Family home (Scharff Avenue) in San Jose, CA; and the UFW Office in Calexico, CA (El Hoyo). Additional documentation was provided for McDonnell Hall, the Monterey County Jail, and El Hoyo.

A number of comments identified additional sites not listed in the draft study report that should be recognized as significant to Cesar Chavez and the farm labor movement. These sites have been included in the final study report in Appendix G. Some comments stated that the historic sites were not critical to preserving this history; rather the history could be told at other sites and facilities, and expensive preservation of historic structures would not be needed.

Some comments addressed research and documentation, particularly the need to document the oral histories of those who participated in the farm labor movement so that the legacy of Cesar Chavez and the movement continues for future generations. Comments stressed the urgency to capture these stories before they disappear. Some comments focused on interpretation and education, expressing a desire to preserve the stories locally to engage and educate children and future generations about the history and relevancy of Cesar Chavez and the farm labor movement. Comments also emphasized recognition of other farm labor leaders such as Larry Itliong and Dolores Huerta, and the inclusion of multiple perspectives in telling the story of Cesar Chavez and the farm labor movement.

Some comments supported the establishment of NPS partnerships with site owners and local communities, citing partnerships as an important tool in leverage funding, pursuing historic designation, and maintaining and preserving resources. A number of potential partnerships were recommended in the comments received, including partnerships with the Cesar E. Chavez Foundation, the City of Coachella, and Monterey County.

A public comment and response report summarizing comments received by the National Park Service during the public comment period is available on the study website at [www.nps.gov/pwro/chavez](http://www.nps.gov/pwro/chavez).

## **Agency Consultation**

The National Park Service sent out letters to agencies and tribal organizations announcing the commencement of the study and requesting their input.

### State Historic Preservation Office (Section 106 of the National Historic Preservation Act)

State Historic Preservation Officers (SHPOs) in California and Arizona were notified by letter in May 2011 of the conduct of the special resource study. The Arizona State Historic Preservation Office submitted a comment letter on the draft study supporting alternative E and suggesting that sites associated with Cesar Chavez's youth in the Yuma region of Arizona should be included as park sites in alternative E.

### U.S. Fish and Wildlife Service (Section 7 of the Endangered Species Act)

The Endangered Species Act of 1973 (ESA), directs every federal agency to ensure that any action it authorizes, funds, or carries out is not likely to jeopardize the existence of any listed species or destroy or adversely modify critical habitat (50 CFR 400). The study team reviewed the U.S. Fish and Wildlife Service's California Diversity database to check for the presence of any listed species or critical habitat at nationally significant sites identified in the study. No known threatened or endangered species occur at the related sites or along urban, suburban and rural areas that would likely encompass much of the march route from Delano to Sacramento. No rare species were documented for La Nuestra Senora de La Paz; however, because most of the area at La Nuestra Senora de La Paz has not been surveyed for rare, threatened or endangered species, it is unknown to what degree these may be present

at the site. The only nationally significant site in Arizona is in an urban center and highly unlikely to contain listed species or critical habitat. Should Congress designate a new unit of the national park system as a result of this study, the National Park Service would begin a management planning process for the new unit and consult with the U.S. Fish and Wildlife Service as appropriate.

Tribal Organizations

Letters were sent to the following tribal organizations to notify them of the study process and to seek their input:

1. Augustine Band of Cahuilla Indians
2. Cabazon Band of Mission Indians
3. Quechan Tribe
4. Torres-Martinez Desert Cahuilla Indians
5. Tule River Indian Tribe

**Findings**

The NPS has determined that this special resource study does not constitute an action that normally requires an Environmental Impact Statement (EIS). The findings of the study will not have a significant effect on the human environment, and no major environmental impacts are foreseen. There are no significant adverse impacts on public health, public safety, threatened or endangered species, historic properties either 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 recommended actions will not violate any federal, state, or local environmental protection law. This determination also included due consideration of the supportive nature of public comments and agency, tribal and county recommendations which were received. Based on the foregoing, it has been determined that an environmental impact statement is not required for this special resource study and thus will not be prepared.

Approved:

  
for Christine S. Lehnertz  
Pacific West Regional Director

12/15/11  
Date

