

DETERMINATION of NO IMPAIRMENT
MUIR WOODS NATIONAL MONUMENT
WATER/WASTEWATER SERVICE REHABILITATION PROJECT

National Park Service, U.S. Department of the Interior
Golden Gate National Recreation Area
May 2017

National Park Service (NPS) *Management Policies 2006* (§1.4) requires analysis of potential effects to determine whether or not actions will impair a park's resources and values. The fundamental purpose of the national park system established by the Organic Act and reaffirmed by the General Authorities Act, as amended, mandates that NPS conserve park resources and values. NPS managers must always seek ways to avoid, or to minimize to the greatest degree practicable, adverse impacts on park resources and values. However, the laws do give NPS management discretion to allow impacts on park resources and values when necessary and appropriate to fulfill the purposes of the park, although that discretion is limited by the statutory requirement that the NPS must leave 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 NPS 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. Non-resource topics are generally not subject to impairment assessment. Whether an impact could lead to impairment depends on the particular resources that will be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts. An impact on any park resource or value may, but does not necessarily, constitute impairment. An impact will be more likely to constitute 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, or
- Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
- Identified in the park's general management plan or other relevant NPS planning documents as being of significance.

An impact may be less likely to constitute impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated. Impairment may result from visitor activities, NPS administrative activities, or activities undertaken by concessioners, contractors and others operating in the park. Impairment may also result from sources or activities outside the park.

An impairment determination is not made for all resource impact topics analyzed for the Proposed Action Alternative. An impairment determination is not made for land use, visitor use and experience, transportation and utilities, socioeconomic, and visitor health and safety because impairment findings relate back to park resources and values. These impact areas are not generally considered to be 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.

Cultural Resources

The Selected Alternative will not result in the impairment of cultural resources. Construction activities will avoid identified archeological sites and the Muir Woods Historic District will not be subject to

adverse impacts. Impacts to cultural resources within the Monument would be minimal, short-term during trenching and other construction activities and have long-term direct beneficial impacts associated with the removal of the water tank and rehabilitation of a small historic shed.

Geology and Soils

There would be no impact to geologic resources. Impacts on soils would be direct, short and long-term, and adverse from removal, back filling, compaction, and soil structure modification. Direct, long-term, beneficial impacts from the Selected Alternative include decreased turbidity and sedimentation in Redwood Creek, and native plant revegetation following construction. Therefore, there would be no impairment of these resources.

Soundscapes

Short-term temporary adverse impacts on the surrounding natural soundscape during construction activities, there would be no impairment of this resource.

Wildlife and Habitat

Only a relatively small area of wildlife habitat would be affected in the project area and construction would avoid these areas during periods when wildlife is most sensitive. Over the long term, the majority of these projects would improve wildlife habitat. There will be no impairment of these resources

Threatened or Endangered Species

The Selected Alternative will not result in the impairment of threatened or endangered species. Although there is the potential of short-term impacts on federally endangered Coho salmon, threatened steelhead trout and habitat from polluted runoff caused by soil erosion and instream channel work during construction activities, the Selected Alternative would have long-term beneficial cumulative effects on critical salmonid habitat; negligible impacts on the threatened northern spotted owl; and no impacts on the threatened marbled murrelet and California red legged frogs.

Water Resources and Hydrologic Resources

The proposed actions under the Selected Alternative would have negligible short-term impacts from polluted runoff caused by soil erosion from areas disturbed by construction. With the implementation of SWPPP mitigation measures and best management practices for controlling runoff pollution and protecting hydrologic processes, there would be no impairment to these resources.

Vegetation

The proposed activities under the Selected Alternative would cause a minimal loss of vegetation and not affect rare plants because the actions will occur on or near developed areas where vegetation has been previously disturbed and no rare plant habitat is present. Areas affected by construction activities will be regraded and replanted, resulting in long-term beneficial impacts on vegetation. This resource will, therefore, not be impaired.

Visitor Use, Experience, and Safety

Potential impacts on visitor use, experience, and safety due to temporary construction activities would have short-term adverse impacts. A rehabilitated sewer and water system will eliminate the risk of sewage contamination or loss of drinking water due to failure of an aging system, resulting in overall long-term beneficial impacts on visitor use, experience, and safety. These resources will not be impaired.

Transportation and Parking

Because the Selected Alternative would result in short-term, adverse and long-term, beneficial impacts on transportation and parking, these resources will not be impaired.

Conclusion

The National Park Service has determined that implementation of the Selected Alternative will not constitute an impairment of the resources or values of the monument. This conclusion is based on consideration of the Monument's purpose and significance, a thorough analysis of the environmental impacts described in the *Muir Woods National Monument Water/Wastewater Service Rehabilitation Final Environmental Assessment*, comments provided by the consulting agencies and the general public, and the professional judgement of the decision maker guided by the direction of the 2006 NPS *Management Policies*.

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 implementing the selected action for rehabilitating the Monument's water and wastewater systems.