



# Environmental Assessment

**Reconstruction of Bonnie Clare Road,  
Milepost 0.0 to Milepost 7.7;  
Reconstruction of Grapevine Ranger Station Parking Lot and  
Sidewalks; and  
Resurfacing OF Mesquite Spring Campground Road  
Milepost 0.0 to Milepost 1.9**

## APPENDIXES, VOLUME II





## **APPENDIXES**

**APPENDIX A: AGENCY CORRESPONDENCE**

**APPENDIX B: PUBLIC SCOPING**

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## APPENDIXES



## **APPENDIX A: AGENCY CORRESPONDENCE**

## **APPENDIX A: AGENCY CORRESPONDENCE**

October 14, 2010

Carl Benz, Section 7 Program Coordinator  
U.S. Fish and Wildlife Service  
2493 Portola Road, Suite B  
Ventura, CA 93003

**RE: Rehabilitation of Bonnie Clare Road through Grapevine Canyon  
from M.P. 7.0 to MP 0.0 at Death Valley National Park**

Dear Mr. Benz:

The National Park Service at Death Valley National Park (Park) is seeking comments and a species list regarding a proposed project involving the rehabilitation of Bonnie Clare Road. The National Park Service proposes to rehabilitate seven miles of the Bonnie Clare Road, commonly referred to as Grapevine Canyon Road, from milepost 7.0 north of the Ubehebe Crater Road intersection to the northeast boundary of the Park. This section of Bonnie Clare Road is narrow, has alignment issues, and has deteriorated over the years, presenting a hazard to vehicular travel in the Park.

Grapevine Canyon Road serves as an access point for the northeastern boundary of the Park and is the most direct route of travel for visitors coming from Tonopah, Nevada. It provides access to the Grapevine and Last Chance mountain ranges in the Park, which includes historic Scotty's Castle, Ubehebe Crater, Mesquite Spring, and several backcountry sites. The current asphalt pavement is deteriorating, contains road reaches with poor site distance, is narrow, and presents a safety concern. The project includes some in-place recycling and hot asphalt overlay of approximately four miles, and reconstruction, widening, and some realignment of approximately three miles of roadway.

Bonnie Clare Road is an important ethnographic and historic resource. It was a significant prehistoric travel corridor for the Timbisha Shoshone Tribe who live within the park boundaries, and portions of the road are adjacent to the Death Valley Scotty Historic District (listed on the National Register of Historic Places in 1978). An ethnographic report for Bonnie Clare Road was completed in 2006. The National Park Service is currently writing a Determination of Eligibility for listing Bonnie Clare Road in the National Register. The Park has completed historic structure reports (1991 and 2009), a historic resource study (2009), and a draft cultural landscape report (2009) for the Historic District, as well as a parkwide road systems evaluation (1996). These documents and studies will be used to inform decision making and analysis of project impacts.

## APPENDIX A: AGENCY CORRESPONDENCE

Carl Benz, Section 7 Program Coordinator  
U.S. Fish and Wildlife Service  
October 14, 2010  
Page Two

To help identify environmental issues that may be affected due to the planned construction project, please provide us with written comments concerning interests within your agency's responsibility. Specifically, we are interested in federally listed endangered, threatened, candidate, special concern species and habitat designations, and sensitive communities known to occur on or in proximity to the proposed construction location within the Park. Your response within 30 days from the date of receipt of this letter would be greatly appreciated. A similar letter has been sent to the California Department of Fish and Game regarding the presence of state-listed endangered, threatened, candidate, and special concern species and their potential habitat.

We welcome your input on the proposed project and our intended efforts to avoid adverse effects on threatened and endangered species. If, through the course of project development, it is determined that the project may affect any listed species, we intend to fulfill our obligations to consult under Section 7 of the Endangered Species Act. Thank you for your assistance. Should you have any questions, please contact Victoria Wilkins, Environmental Protection Specialist, at 760.786.3227; or Linda Manning, Wildlife Biologist, at 760.786.3252.

Sincerely,

Sarah Craighead  
Park Superintendent

Enclosure (project map)



## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Ventura Fish and Wildlife Office  
2493 Portola Road, Suite B  
Ventura, California 93003



IN REPLY REFER TO:  
81440-2011-SL-0560

October 19, 2011

### Memorandum

To: Superintendent, Death Valley National Park, National Park Service, Death Valley, California

From: Senior Biologist, Ventura Fish and Wildlife Office, Ventura, California

Subject: Bonnie Clare Road Rehabilitation Project, Death Valley National Park, California (L7617)

We are responding to your request, dated September 22, 2011, and received in our office on September 26, 2011, for information on endangered and threatened species that may occur along Bonnie Clare Road, commonly referred to as Grapevine Canyon Road, within Death Valley National Park (Park). The National Park Service (NPS) proposes to reconstruct, widen, and realign portions of the road, from milepost 7.0 north of the Ubehebe Crater Road intersection to the northeast boundary of the Park. Your request and our response are made pursuant under section 7 of the Endangered Species Act of 1973, as amended (Act).

The federally threatened desert tortoise (*Gopherus agassizii*) and the federally endangered Least Bell's vireo (*Vireo bellii pusillus*) and southwestern willow flycatcher (*Empidonax traillii extimus*) may occur within the proposed project area. The proposed project is not within designated critical habitat. To the best of our present knowledge, no other federally listed, candidate, or proposed species are known to occur in the prospective project area.

This letter fulfills our requirements under section 7(c) of the Act. The NPS, as the lead Federal agency for the project, has the responsibility to review its proposed activities and determine whether any listed species may be affected. If the project is a construction project that may require an environmental impact statement<sup>1</sup>, the NPS has the responsibility to prepare a biological assessment to make a determination of the effects of the action on the listed species or critical habitat. If the NPS determines that a listed species or critical habitat is likely to be adversely affected, it should request, in writing through our office, formal consultation pursuant to section 7 of the Act. Informal consultation may be used to exchange information and resolve conflicts with respect to threatened or endangered species or their critical habitat prior to a

<sup>1</sup>"Construction project" means any major Federal action which significantly affects the quality of the human environment designed primarily to result in the building of structures such as dams, buildings, roads, pipelines, and channels. This includes Federal actions such as permits, grants, licenses, or other forms of Federal authorizations or approval which may result in construction.

Superintendent

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written request for formal consultation. During this review process, the NPS may engage in planning efforts but may not make any irreversible commitment of resources. Such a commitment could constitute a violation of section 7(d) of the Act.

We recommend that NPS implement measures to avoid and minimize effects to any listed species that may be present and to wildlife and habitat in general. Such measures could include constructing a temporary desert tortoise fence around working or staging areas in potential desert tortoise habitat, employing run-off barriers to avoid contaminating washes and creeks, and avoiding construction activities during avian breeding and nesting seasons. We also recommend pre-construction surveys and monitoring during construction. If surveys detect individuals of listed species during the planning process, we are available to discuss the proposed action and more specific protective measures at that time.

Information is also available in the California Department of Fish and Game's Natural Diversity Data Base. You can contact the California Department of Fish and Game at (916) 324-3812 for information on other sensitive species that may occur in this area.

Should you have any questions regarding this matter, please contact Danielle Dillard in the Ventura Fish and Wildlife Office at (805) 644-1766, extension 315.





IN REPLY REFER TO:

## United States Department of the Interior

NATIONAL PARK SERVICE  
Death Valley National Park  
Death Valley, California 92328

H4217 (DEVA)

November 30, 2004

Mr. Milford Wayne Donaldson  
State Historic Preservation Officer  
Department of Parks and Recreation  
P.O. Box 942896  
Sacramento, California 94296-9824

Dear Mr. Donaldson:

Reference: Death Valley National Park, PMIS 88910, 89924, 89926, & 90026

Subject: Compliance with Section 106 of the National Historic Preservation Act and  
National Environmental Policy Act (NEPA)

The National Park Service (NPS) is developing plans to rehabilitate asphalt paving, make corrections to drainage problems, and potentially realign portions of the Bonnie Claire Road 11(1), 11(1a), 11(2), and Ubehebe Road 109(1). Please see the attached document for a location map of the project. Minimal improvement to the Mesquite Campground Road may also be part of this project.

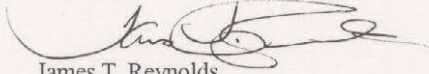
We have begun the NEPA process for this project and anticipate preparing an environmental assessment. In accordance with 36 CFR 800.8 (c) of the Advisory Council on Historic Preservation's regulations, I am notifying your office in advance of the park's intention to use the NEPA process to meet its obligations under Section 106 of the National Historic Preservation Act.

We look forward to working with your organization, other consulting parties, and the public as we proceed with the environmental planning process for this project. We would be happy to arrange a meeting with you at your convenience to discuss this project if necessary. Please contact

**APPENDIX A: AGENCY CORRESPONDENCE**

me through my email address, [DEVA\\_superintendent@nps.gov](mailto:DEVA_superintendent@nps.gov) , or by telephone at (760) 786-3240. You may also contact David Hayes, Denver Service Center Cultural Resource Specialist, at (303) 969-2975 ([david\\_hayes@nps.gov](mailto:david_hayes@nps.gov)).

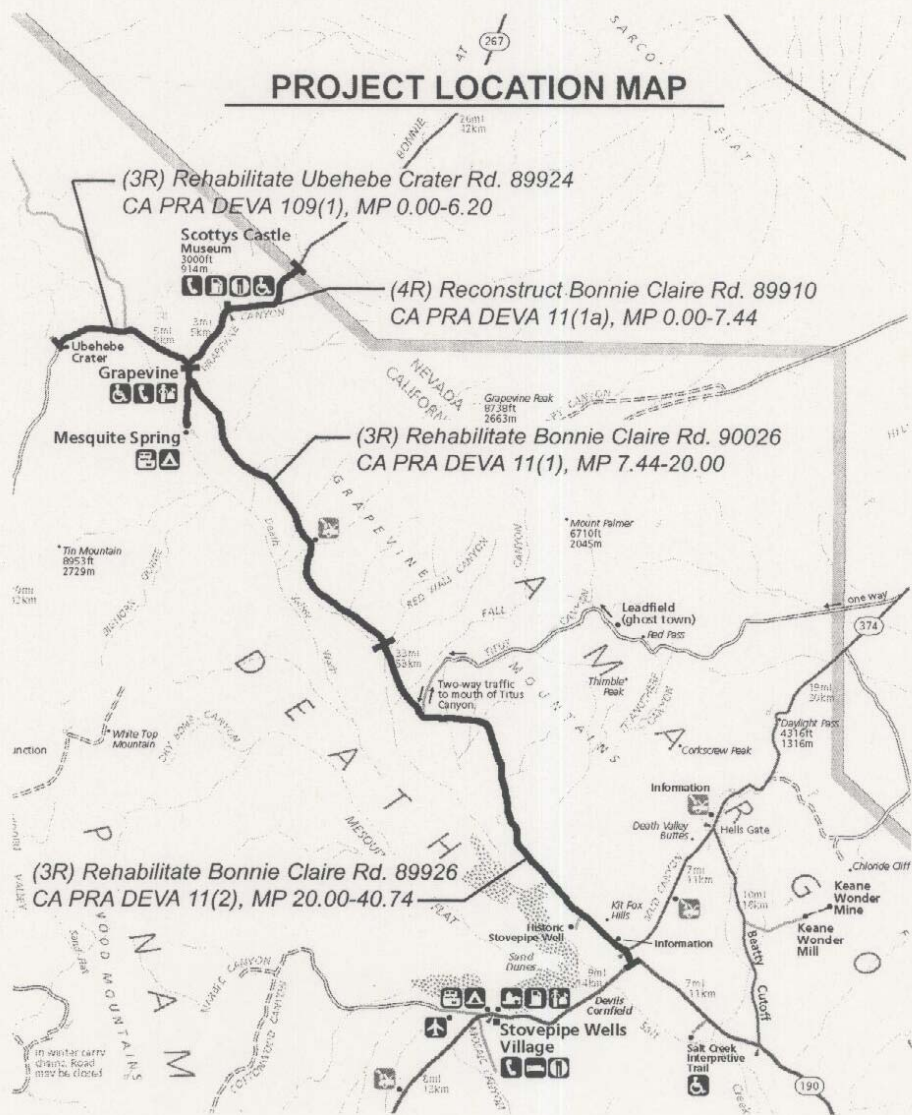
Sincerely,



James T. Reynolds  
Superintendent  
Death Valley National Park

cc: Mr. Don Klima, Director  
Advisory Council on Historic Preservation  
Old Post Office Building  
1100 Pennsylvania Avenue, NW, Suite 809  
Washington, DC 2000

NPS - DEVA – Badder, Wayne  
NPS - DEVA – Greene, Linda  
DSC - Transportation – Hayes, David  
DSC - Transportation – Hartwig, Kim



Attachment 1: Location map for Bonnie Claire and Ubehebe Roads Project at Death Valley National Park

APPENDIX A: AGENCY CORRESPONDENCE



**United States Department of the Interior**

NATIONAL PARK SERVICE

Death Valley National Park  
PO Box 579  
Death Valley, California 92328



IN REPLY REFER TO:  
L2431

October 27, 2010

Milford Wayne Donaldson  
State Historic Preservation Officer  
California State Parks  
Office of Historic Preservation  
1725 23rd Street, Suite 100,  
Sacramento CA 95816

Attn: Mark Beason, State Historian II

Subject: Federal Agency Initiation of Section 106 Consultation, Rehabilitation of Bonnie Clare Road through Grapevine Canyon from M.P. 7.0 to MP 0.0, Death Valley National Park

Dear Mr. Donaldson:

I would like to thank you and your staff for your participation in a teleconference on October 12, 2010 between the National Park Service (NPS) Pacific West Region staff, NPS Death Valley National Park staff, NPS Denver Service Center staff, and Archer, Inc. staff, to discuss the Federal Highways Administration (FHWA) and NPS proposal to rehabilitate seven miles of the Bonnie Clare Road (commonly referred to as Grapevine Canyon Road), from milepost 7.0 north of the Ubehebe Crater Road intersection to the northeast boundary of the park. A summary of the conference call for your files (Enclosure A) is enclosed with this correspondence.

Through this letter, the NPS is seeking to initiate consultation with the California State Historic Preservation Officer under Section 106 of the National Historic Preservation Act regarding the above proposal. Grapevine Canyon Road provides access to the Grapevine and Last Chance mountain ranges (located in the park), which includes historic Scotty's Castle, Ubehebe Crater, Mesquite Spring Campground and several backcountry sites. The road serves as an access point for the northeastern boundary of the park and is the most direct route of travel for visitors coming to Scotty's Castle from Nevada. A copy of the Project Map is enclosed for your review (Enclosure B).

Currently, the Grapevine Canyon Road asphalt pavement is deteriorating, contains road reaches with poor site distance, is narrow, and presents a safety concern. The proposed project includes some in-place recycling and hot asphalt overlay of approximately four miles, and reconstruction, widening, and some realignment of approximately three miles of roadway.

Bonnie Clare Road is an important ethnographic and historic resource. It was a significant prehistoric travel corridor for the Timbisha Shoshone Tribe who continue to live within the Park boundaries, and portions of the road are adjacent to the Death Valley Scotty Historic District (listed on the National Register of Historic Places in 1978). An ethnographic report for Bonnie Clare Road was completed in 2006. The National Park Service is currently writing a determination of eligibility for listing Bonnie



Clare Road on the National Register. The Park has completed historic structure reports (1991 and 2009), a historic resource study (2009), and a draft cultural landscape report (2009) for the Historic District, as well as a parkwide road systems evaluation (1996). These documents and studies will be used to inform decision making and analysis of project impacts.

The goal of the NPS is to avoid adverse impacts to cultural resources in our care. In order to assist the National Park Service in compliance with the National Historic Preservation Act, and the preparation of the environmental assessment, we welcome your review and comments of this project. Your written comments concerning interests with your agency's responsibility would be greatly appreciated within 30 days of receipt of this letter. Your comments may be submitted online at the NPS Planning, Environment, and Public Comment website: <http://parkplanning.nps.gov/deva>. The website also contains a description of the alternatives being proposed. If you do not have internet access, you are welcome to mail your comments regarding this proposed project directly to the park:

Death Valley National Park  
ATTENTION: Bonnie Clare Road Rehabilitation Comments  
Victoria Wilkins  
PO Box 579  
Death Valley, CA 92328

Thank you for consulting with us on this project. We feel that SHPO's involvement will result in a better project and in enhanced protection of natural and cultural resources at Death Valley National Park. Should you have any questions, please contact Victoria Wilkins, Environmental Protection Specialist at 760-786-3227, or Blair Davenport, Cultural Resources Manager at 760-786-3287.

Sincerely,



Sarah Craighead  
Superintendent

Enclosures

A - October 12, 2010 Conference Call Summary  
B - Project Map

cc (w/ enclosures): Vida Germano, PWRO  
Cathy Gilbert, PWRO  
Victoria Wilkins, DEVA  
Blair Davenport, DEVA  
Richard Boston, DSC

bc: central files

**Rehabilitation of Bonnie Clare Road  
Cultural Resources NHPA Compliance Strategy Meeting Summary  
DEVA, DSC, and SHPO  
October 12, 2010**

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**Participants**

- Mark Beason – CA SHPO
- Victoria Wilkins – NPS/DEVA Compliance Specialist
- Leah Bonstead – NPS/DEVA Park Archeologist
- Blair Davenport – NPS/DEVA Cultural Resources Manager
- Jayne Aaron – AARCHER Project Manager, NEPA & CR Specialist
- Kari Carmany-George – AARCHER Cultural Resources Specialist
- Cathy Gilbert – NPS PWR Cultural Landscape Lead
- Vida Germano – NPS PWR CLI Coordinator
- Richard Boston – NPS/DSC Cultural Resource - Archeologist Specialist/COTR

**Discussion**

Richard Boston provided an overview and history of the *Rehabilitation of Bonnie Clare Road* project as summarized on the agenda. Briefly, the proposed project is to reconstruct approximately 7 miles of Bonnie Clare Road from MP 0.0 at the northeast park boundary and the end of Nevada State Route 267 past Scotty's Castle, across Cottonwood Wash and through Grapevine Canyon to MP 7.0 just north of the Ubehebe Crater Road intersection. The project was started in 2004, but the impacts were deemed too great and the project was put on hold until 2010. The road has safety issues; primarily larger vehicles (recreation vehicles) cannot stay in lane on the tight, narrow curves. The Federal Highways Administration (FHWA) has developed a new design and strategy that is more sensitive to the cultural landscape, cultural resources, and natural resources in the canyon.

Some of the design strategies include:

Section of road in front of Scotty's Castle entrance: lessen the amount of widening, cuts will be minimal. The road would be moved approximately 2 feet towards / into the Death Valley Scotty Historic District boundary with retaining walls and revegetation.

Death Valley Ranch fence – the historic fence line marks the Historic District boundary, is a contributing element to the historic district, and is directly adjacent to the road: minimal widening of the road would occur; however in some cases the fence will need to be moved. It is preferable to move the fence rather than to remove large sections of the canyon walls. The fence would be repaired and rehabilitated; when possible, fallen and intact fence posts would be repaired and re-erected and broken fence posts would be recreated. The National Register nomination form for the Historic District is being updated. It is not known at this time if the fence-line should be a contributing element of the travel corridor cultural landscape. NPS will be conducting a cultural landscape inventory.

There was discussion about the number of fence posts to be moved (magnitude). Park staff indicated that FHWA could calculate this number. There was also discussion regarding maintaining a continuous line and relationship of the fence to the road. It may be necessary to move additional fence posts to maintain the fence alignment.

Canyon walls: in some cases, approximately 2 feet of the canyon wall would be removed. After removal, the same vertical aspect of the existing wall would be maintained.



**Rehabilitation of Bonnie Clare Road  
Cultural Resources NHPA Compliance Strategy Meeting Summary  
DEVA, DSC, and SHPO  
October 12, 2010**

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An archaeological survey was conducted in 2004, and in 2010, the sites were relocated and site condition was documented. There are four archaeological sites within 5 meters of the road; two sites are bisected by the road. No road widening or realignment would occur at these two locations.

It is the intent of the National Park Service to minimize effects and avoid adverse effects to archaeological sites and the cultural landscape.

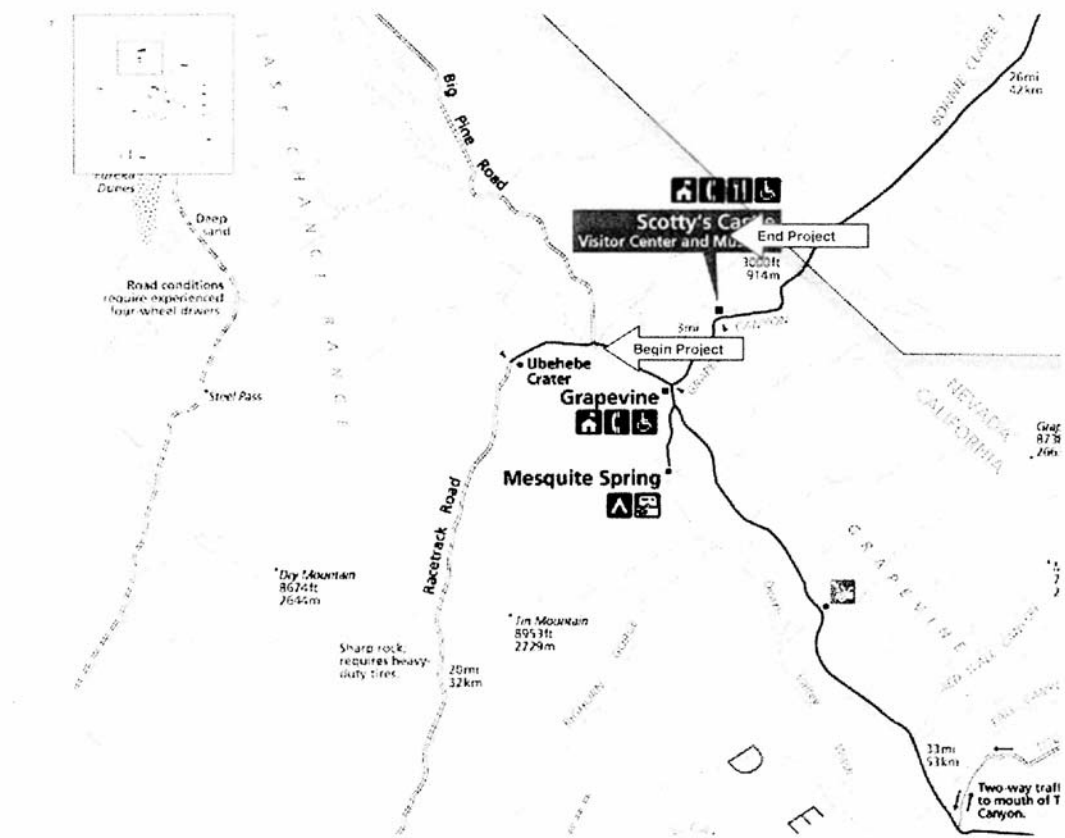
Mark Beason, CA SHPO, would like to see where the existing fence line and posts are and where they are proposed to be moved. Cathy indicated that FHWA was doing this with GIS.

Park staff said they would send Mark Beason the final copies of the archaeological report and the ethnographic reports.

**Compliance Strategy**

- Initiate formal consultation; this will place the project in the SHPO's system. Communication should be frequent throughout the duration of the project.
- AARCHER will compile a site history for the road, and complete a first draft by first week in Nov. 2010
- Pacific West Region (PWR) staff will develop the Cultural Landscape Inventory (CLI). PWR should complete the CLI by early Feb. 2011.
- AARCHER will use the CLI to update the National Register nomination forms and develop a Determination of Eligibility for the project and submit to CA SHPO for NHPA Compliance.
- Remote sensing on fence posts to be moved is not necessary; however, a monitor should be present.
- Programmatic Agreement (PA) can be developed if the effects are unknown and NPS wants to start the process. A Memorandum of Agreement (MOA) will be developed when effects are known.

Bonnie Clare Road Project Map





United States Department of the Interior  
NATIONAL PARK SERVICE  
Death Valley National Park  
PO Box 579  
Death Valley, California 92328



DIRECTLY RESPONSIBLE TO:  
H4217

July 1, 2011

MAILED USPS CERTIFIED-RETURN RECEIPT

Milford Wayne Donaldson  
State Historic Preservation Officer  
Attn: Mark Beason, State Historian II  
Department of Parks and Recreation  
Post Office Box 942896  
Sacramento, CA 94296-0001

Subject: Transmittal of 100% Draft Cultural Landscape Inventory, Bonnie Clare Road, Inyo County, Death Valley National Park

Dear Mr. Donaldson:

Enclosed for your review is the 100% Draft Cultural Landscape Inventory (CLI) for the Bonnie Clare Road, located in Death Valley National Park (Park), Inyo County, California. The Park is seeking California State Historic Preservation Office consensus with the National Park Service (NPS) finding that the Bonnie Clare Road is eligible for the National Register of Historic Places at the local level under criteria A and C, for its association with the NPS's Mission 66 road planning and road design program between 1947 and 1951. The *Summary Table of Contributing Resources* provides an overview of the character-defining features of the road as described in the CLI (see enclosures 1 and 2).

The CLI was prepared by NPS staff from the Pacific West Region Cultural Landscapes Program in support of several efforts (see enclosures 3 and 4) currently in progress for the Bonnie Clare Road including:

- as a proposed DOE for the Bonnie Clare Road;
- Section 106 compliance requirements associated with Federal Highways (FHWA) Project DEVA 89910-4R Reconstruction of the 7.6 mile segment of the Bonnie Clare Road/Grapevine Canyon;
- documentation of cultural landscape resources required for the Environmental Assessment for the above mentioned FHWA project

Bonnie Clare Road has a long and rich history of development as a transportation corridor, representing a continuity of use extending from the prehistoric period to the present. Archaeological investigations have yielded evidence of human use and occupation dating over 11,000 years in Death Valley and over 5,000 years in Grapevine Canyon. During the historic era, the Grapevine Canyon travel corridor developed into a wagon trail used by homesteaders and miners that traveled from the Ubehebe area east to the railroad at the town of Bonnie Clare (until 1928), and also provided access to Albert Johnson's Death Valley Ranch (Scotty's Castle). Between 1929 and 1930, Johnson relocated Bonnie Clare Road from the middle of Grapevine Canyon to the

## APPENDIX A: AGENCY CORRESPONDENCE

H4217

July 1, 2011

Milford Wayne Donaldson

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south side of the canyon outside his land claims. The Civilian Conservation Corps also performed repair work on Bonnie Clare Road in 1934 in response to damage caused by storms. By the late 1940s, the road was in need of significant repair. Work was completed by the NPS as part of early Mission 66 road development efforts in 1947, 1948 and 1951.

The period of significance for the road corridor begins in 1947 when approximately three miles of the route was resurfaced in an effort to improve visitor access, capacity, and safety. The period ends in 1951 when the rehabilitation of 4.9 miles of road from Scotty's Castle to the park boundary was completed by the NPS. While the 1947-1951 work predates the most intensive period of Mission 66 development in the Park, it responded to relevant themes of the period as outlined by the January 2006 Draft National Register of Historic Places Multiple Property Documentation form for NPS Mission 66 Resources, which suggests that the efforts leading to the development of the Mission 66 program actually began in 1945 in response to the conditions, concerns, and design trends that precipitated after the end of World War II as a result of the lifting of travel restrictions and rationing.

The Bonnie Clare Road reflects the naturalistic character of Grapevine Canyon. This was achieved in part by highlighting narrow canyons, sharp corners and lush vegetation through the careful design of the road around these character-defining features. Principle landscape characteristics of the road include natural systems and features, spatial organization, land use, topography, views and vistas, and archeological sites. Collectively, these landscape characteristics and their associated features serve as an excellent example of development within the context of early Mission 66 design and construction between 1947 and 1951 in the Park. While the road has been repaired several times as a result of the dynamic nature of the landscape, the road retains all seven aspects of integrity, including location, design, setting, materials, workmanship, feeling and association.

We greatly appreciate your office's assistance and want to thank you for the review of this finding. If you concur with the finding of eligibility for the Bonnie Clare Road, please send us a letter stating your concurrence. If you need additional information, or have questions or concerns, please contact Blair Davenport, Cultural Resources Manager, at 760/786-3287, or, [blair\\_davenport@nps.gov](mailto:blair_davenport@nps.gov).

Sincerely yours,

Sarah Craighead  
Superintendent

Enclosures:

1. *100% Draft Cultural Landscape Inventory, Bonnie Clare Road* (1 binder)
2. *Summary Table of Contributing Resources, Bonnie Clare Road* (1 page)
3. Letter from NPS to CASHPO, *Federal Agency Initiation of Section 106 Consultation, Rehabilitation of Bonnie Clare Road through Grapevine Canyon from M.P. 7.0 to MP 0.0, Death Valley National Park*, October 18, 2010 (3 pages)
4. Letter from CASHPO to NPS, *Bonnie Clare Road Rehabilitation Comment, Death Valley National Park*, December 16, 2010

October 14, 2010

Barbara Durham, Tribal Chair  
Joseph Kennedy, Tribal Historic Preservation Officer  
Timbisha Shoshone Tribe  
PO Box 206  
Death Valley, CA 92328-0206

**RE: Request for Consultation for the Rehabilitation of Bonnie Clare Road through Grapevine Canyon from M.P. 7.0 to MP 0.0 at Death Valley National Park**

Dear Ms. Durham and Mr. Kennedy:

The National Park Service (NPS) and Death Valley National Park staff would like to consult with the Timbisha Shoshone Tribe regarding a proposal to rehabilitate seven miles of Bonnie Clare Road, commonly referred to as Grapevine Canyon Road, from milepost 7.0 north of the Ubehebe Crater Road intersection to the northeast boundary of Death Valley National Park (Park). This section of Bonnie Clare Road is narrow, has alignment issues, and has deteriorated over the years, presenting a hazard to vehicular travel in the Park.

Grapevine Canyon Road serves as an access point for the northeastern boundary of the Park and is the most direct route of travel for visitors coming from Tonopah, Nevada. It provides access to the Grapevine and Last Chance mountain ranges in the Park, which includes historic Scotty's Castle, Ubehebe Crater, Mesquite Spring, and several backcountry sites. The current asphalt pavement is deteriorating, contains road reaches with poor site distance, is narrow, and presents a safety concern. The project includes some in-place recycling and hot asphalt overlay of approximately four miles, and reconstruction, widening, and some realignment of approximately three miles of roadway.

The Bonnie Clare Road is an important ethnographic and historic resource. It was a significant prehistoric travel corridor for the Timbisha Shoshone Tribe who live within the Park boundaries, and portions of the road are adjacent to the Death Valley Scotty Historic District (listed on the National Register of Historic Places in 1978). An ethnographic report for Bonnie Clare Road was completed in 2006. The National Park Service is currently writing a determination of eligibility for listing Bonnie Clare Road on the National Register. The Park has completed historic structure reports (1991 and 2009), a historic resource study (2009), and a draft cultural landscape report (2009) for the Historic District, as well as a parkwide road systems evaluation (1996). These documents and studies will be used to inform decision making and analysis of project impacts.

It is our sincerest desire to involve the Timbisha Shoshone Tribe in this planning process. This initial letter will be followed by a phone call to discuss with you the proposed project and the

## APPENDIX A: AGENCY CORRESPONDENCE

tribe's interest in being consulted during all phases of the development of the environmental assessment and cultural resources studies. The Park Web site (<http://parkplanning.nps.gov/deva>) contains a description of the alternatives being proposed.

Thank you for your assistance. Should you have any questions, please contact Blaire Davenport, Museum Curator, at 760.786.3287, or Victoria Wilkins, Environmental Protection Specialist, at 760.786.3227.

Sincerely,

Sarah Craighead  
Park Superintendent

Enclosure (project map)



STATE OF CALIFORNIA – THE RESOURCES AGENCY

ARNOLD SCHWARZENEGGER, Governor

**OFFICE OF HISTORIC PRESERVATION  
DEPARTMENT OF PARKS AND RECREATION**

1725 23<sup>rd</sup> Street, Suite 100  
SACRAMENTO, CA 95816-7100  
(916) 445-7000 Fax: (916) 445-7053  
calshpo@parks.ca.gov  
www.ohp.parks.ca.gov



December 16, 2010

Reply In Reference To: NPS101101A

Death Valley National Park  
Victoria Wilkins  
P.O. Box 579  
Death Valley, CA 92328

RE: Bonnie Clare Road Rehabilitation Comments, Death Valley National Park, California

Dear Ms. Wilkins:

My office has received the October 27, 2010, letter initiating consultation with regard to the proposed undertaking at Death Valley National Park. The National Park Service (NPS) is consulting with me in order to comply with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470f), as amended, and its implementing regulation at 36 CFR Part 800. Along with the consultation initiation letter, NPS also submitted a project map and a summary of the October 12, 2010, Cultural Resources NHPA Compliance Strategy Meeting.

The proposed undertaking, as I understand it, involves the rehabilitation of seven miles of Bonnie Clare Road within the park, which will include some in-place recycling and hot asphalt overlay of approximately four miles, and reconstruction, widening, and some realignment of approximately three miles of roadway.

The road is adjacent to the Death Valley Scotty Historic District, which is listed on the National Register of Historic Places (NRHP) and served as a travel corridor for the Timbisha Shoshone Tribe, who still live within the park boundaries.

Thank you for seeking my comments and considering historic properties as part of your project planning. I look forward to continuing consultation on the other steps in the Section 106 process. If you have any questions, please contact Mark Beason of my staff at (916) 445-7047 or [mbeason@parks.ca.gov](mailto:mbeason@parks.ca.gov).

Sincerely,

A handwritten signature in black ink that reads 'Milford Wayne Donaldson'. The signature is written in a cursive style with a large, stylized 'M' and 'D'.

Milford Wayne Donaldson, FAIA  
State Historic Preservation Officer



## United States Department of the Interior

NATIONAL PARK SERVICE  
Death Valley National Park  
PO Box 579  
Death Valley, California 92328



IN REPLY REFER TO:  
L7617

September 22, 2011

Carl Benz, Section 7 Program Coordinator  
U.S. Fish and Wildlife Service  
2493 Portola Road, Suite B  
Ventura, CA 93003

**RE: Rehabilitation of Bonnie Clare Road through Grapevine Canyon  
from M.P. 7.0 to MP 0.0 at Death Valley National Park**

Dear Mr. Benz:

The National Park Service at Death Valley National Park (Park) is seeking comments and a species list regarding a proposed project involving the rehabilitation of Bonnie Clare Road. The National Park Service proposes to rehabilitate seven miles of the Bonnie Clare Road, commonly referred to as Grapevine Canyon Road, from milepost 7.0 north of the Ubehebe Crater Road intersection to the northeast boundary of the Park. This section of Bonnie Clare Road is narrow, has alignment issues, and has deteriorated over the years, presenting a hazard to vehicular travel in the Park.

Bonnie Clare Road, also known as Grapevine Canyon Road, serves as an access point for the northeastern boundary of the Park and is the most direct route of travel for visitors coming from Tonopah, Nevada. It provides access to the Grapevine and Last Chance mountain ranges in the Park, which includes historic Scotty's Castle, Ubehebe Crater, Mesquite Spring, and several backcountry sites. The current asphalt pavement is deteriorating, contains road stretches with poor site distance, is narrow, and presents a safety concern. The project includes some in-place recycling and hot asphalt overlay of approximately four miles, and reconstruction, widening, and some realignment of approximately three miles of roadway.


To help identify environmental issues that may be affected due to the planned construction project, please provide us with written comments concerning interests within your agency's responsibility. Specifically, we are interested in federally listed endangered, threatened, candidate, special concern species and habitat designations, and sensitive communities known to occur on or in proximity to the proposed construction location within the Park. Your response within 30 days from the date of receipt of this letter would be greatly appreciated. A similar letter is being sent to the California Department of

Carl Benz, Section 7 Program Coordinator  
U.S. Fish and Wildlife Service  
September 22, 2011  
Page Two

Fish and Game regarding the presence of state-listed endangered, threatened, candidate, and special concern species and their potential habitat.

We welcome your input on the proposed project and our intended efforts to avoid adverse effects on threatened and endangered species. If, through the course of project development, it is determined that the project may affect any listed species, we intend to fulfill our obligations to consult under Section 7 of the Endangered Species Act. Thank you for your assistance. Should you have any questions, please contact Mike Cipra, Environmental Protection Specialist, at 760.786.3227; or Linda Manning, Wildlife Biologist, at 760.786.3252.

Sincerely,

  
for Sarah Craighead  
Park Superintendent

Enclosure (project map)

MCIPRA:mko\Bonnie\_Clare\_USFWS-ScopingLtr\_9-22-11

Bcc: central files  
RM: Linda Manning  
MGT: Mike Cipra



United States Department of the Interior

NATIONAL PARK SERVICE

Death Valley National Park

P.O. Box 579

Death Valley, CA 92328

IN REPLY REFER TO:

L2431

January 23, 2012

MAILED USPS CERTIFIED MAIL-RETURN RECEIPT

Milford Wayne Donaldson, FAIA  
State Historic Preservation Officer  
California Office of Historic Preservation  
1725 23rd Street, Suite 100  
Sacramento, CA 95816

Attn: Mark Beason, State Historian II

Subject: Continuation of Section 106 Consultation, Death Valley National Park – Reconstruction of Bonnie Clare Road, Reconstruction of Grapevine Ranger Station Parking Lot and Sidewalks, and Resurfacing Mesquite Spring Campground: Compliance with Section 106 of the National Historic Preservation Act

Dear Mr. Donaldson:

The purpose of this letter is to: 1) Update you and your staff regarding some changes to the proposed Undertaking, *Reconstruction of Bonnie Clare Road, Reconstruction of Grapevine Ranger Station Parking Lot and Sidewalks, and Resurfacing Mesquite Spring Campground*; 2) Establish an Area of Potential Effect (APE) for the undertaking; 3) Describe historic properties within the APE; 4) Assess effects on historic properties within the APE; and 5) Briefly describe the proposed Section 106 compliance path.

In accordance with Section 106 of the National Historic Preservation Act and its implementing regulation, 36 CFR 800.3, the National Park Service (NPS), Death Valley National Park (park) initiated informal consultation via teleconference to discuss the project with your office on this project on October 12, 2010. On October 18th, 2011, formal consultation was initiated with the SHPO with a letter, and on July 1, 2011, a cultural landscape inventory / determination eligibility for Bonnie Clare Road was submitted to the SHPO for concurrence. The park initiated consultation with the Timbisha Shoshone Tribal Historic Preservation Officer (THPO) on October 14, 2010, with a letter.

Since beginning formal Section 106 Consultation with SHPO, the park has prepared the attached *Section 106 Compliance Report* (Enclosure 1). This report documents the park's effort to comply with Section 106 and seeks California SHPO concurrence with the park's findings listed below:

- Per 36 CFR 800.4 the park has defined the area of potential effect (APE) for the proposed undertaking and seeks SHPO concurrence with the APE. (see Section 3 of the *Compliance Report*).
- Per 36 CFR 800.4 the park staff has inventoried cultural resources within the APE for the proposed project and determined the following historic properties may potentially be affected by the project:

Reconstruction of Bonnie Clare Road (see Section 4 of the *Compliance Report*).

1. Bonnie Clare Road Historic Property (Cultural Landscape Inventory determined eligible, 2011b - SHPO concurrence requested).
2. Grapevine Canyon Archeological District (Consensus Determination of Eligibility attached – Enclosure 2)
3. Death Valley Scotty Historic District, also known as Scotty's Castle. (NRHP-listed, 1978; cultural landscape inventory determined eligible, 2005). Specifically the following contributing features:
  - Fenceline
  - Indian Camp
  - Historic Entrance
  - Cottonwood Corner

Reconstruction of Grapevine Ranger Station Parking Lot and Sidewalk (see Section 5 of the *Compliance Report*).

1. Grapevine Developed Area Historic District (Consensus Determination of Eligibility attached - Enclosure 3).

Resurfacing Mesquite Spring Campground Road (see Section 6 of the *Compliance Report*)

1. Archeological sites CA-INY-4851H, CA-INY-4822, CA-INY-4734, and CA-INY-4852 adjacent to Mesquite Springs Campground Road.
- Per 36 CFR 800.5, the park has assessed the effects to historic properties that the proposed project would have and seeks the California SHPO's concurrence with the following findings (see Section 7 of the *Compliance Report*) :
1. The undertaking would have an adverse effect to Bonnie Clare Road Historic Property
  2. The undertaking would have an adverse effect to Grapevine Canyon Archeological District
  3. The undertaking would have an adverse effect to Death Valley Scotty Historic District
  4. The undertaking would have no adverse effect on Grapevine Developed Area Historic District
  5. The undertaking would have no adverse effect to archeological sites CA-INY-4851H, CA-INY-4822, CA-INY-4734, or CA-INY-4852

## APPENDIX A: AGENCY CORRESPONDENCE

The park proposes to continue consultation with the California SHPO and the Timbisha Shoshone Tribe to resolve the adverse effects of the proposed project to the above-mentioned resources. Section 10 of the *Compliance Report* contains recommendations for mitigation measures.

### **Proposed Section 106 Compliance Path**

Since beginning formal Section 106 Consultation with your staff (October 12, 2010), the park has completed and submitted to your office for review (July 1, 2011) a Cultural Landscape Inventory of Bonnie Clare Road. We have recently completed evaluations of two other Historic properties, Grapevine Developed Area (a Mission 66 Property) and Grapevine Canyon Archeological District. The results of those evaluations are enclosed for your review.

Because we do not know the exact extent of all impacts to the Historic Properties within the APE we have drafted a Programmatic Agreement (PA) for your review and comment (Enclosure 4).

### **Proposed Mitigation**

The park has developed a draft cultural landscape inventory for Bonnie Clare Road to record and document the road, associated features and historic resources that are adjacent to the road. To mitigate the Adverse Effect to the road the park proposes to prepare a Historic American Engineering Record to document the Bonnie Clare Road Historic Property and surrounding landscape.

To mitigate the Adverse Effect to Grapevine Archeological District, the National Park Service proposes to continue to work with the Timbisha and the California SHPO to nominate the Grapevine Canyon Archeological District for listing in the National Register.

The park proposes to mitigate the adverse effects to the historic fence at Scotty's Castle and by extension the effect to Death Valley Scotty Historic District with a Fence Preservation Plan (see Appendix A of the PA) that would outline actions to preserve, rehabilitate, restore, and/or reconstruct the affected historic fenceline in a manner that meets the Secretary of the Interior's Standards for the Treatment of Historic Properties. The Fence Preservation Plan would also document the appearance, integrity, and condition of the fenceline, and, recommend appropriate preservation and management measures that would not adversely affect significant character-defining features of the fenceline, the Death Valley Scotty Historic District, or the cultural landscape. Currently the boundary fence is in poor to fair condition, as described in the CLI. Some of the changes proposed in the Bonnie Clare Road project will necessitate the removal of additional fence posts. The Fence Plan describes 1) the attempts to save as many of the existing concrete posts as possible; 2) details for constructing new replacement posts; and 3) a proposed alignment of the reconstructed fenceline. This document will undergo some additional revisions based on field assessments conducted January 19, 2012. We had originally proposed a standard spacing of approximately 20 feet for the rehabilitated fenceline. Upon closer inspection of the fence line we will be revising the Plan to space new poles at intervals appropriately. Although the average spacing between posts for the entire fenceline along Bonnie Clare Road is approximately 18 feet, there are sections of the existing fenceline where posts are consistently spaced, 16.5 feet, 26 feet, and approximately 31 feet apart. There is also much more variability in the original wire used along the fenceline. The revised plan will therefore reflect that variability. These changes will increase the number of posts to be manufactured and installed and we also will be revising the number of original posts that will be saved. After the Web-Ex with your staff on November 22, 2011 we re-evaluated posts that were in fair condition and found that additional posts could be saved in place. We hope to have a revised fence plan prepared and submitted to you for review in early February.



The National Park Service plans to avoid impacts to archeological resources through contract language requiring the construction contractor to attend pre-construction meetings with park archeologists and other appropriate NPS personnel and consulting parties as identified by the park. During these meetings, the park personnel and contractor would develop archeological site protection and avoidance measures that would be implemented prior to initiating construction activities.

In addition, the park would develop a plan of action for inadvertent archeological discoveries during construction. The avoidance measures and inadvertent discovery plan of action would be documented in an Inadvertent Discovery and Monitoring Plan (Appendix B of the PA). The plan would outline which locations would undergo archeological monitoring during construction and who would perform the monitoring (e.g., park archeologist, Timbisha monitors, etc.). The plan would also outline the procedures to be taken if an inadvertent discovery is made by the construction contractor or the monitors.

The National Park Service proposes that this plan would serve to mitigate the potential adverse effects to Indian Camp and provide a plan of action should intact deposits within the site be found during construction.

We have included a copy of the draft 95% construction drawings and specifications. However, the FHWA and NPS just concluded a review of the draft 95% construction drawings and found a number of discrepancies. These discrepancies and some additional measures designed to mitigate impacts to primarily cultural resources will be incorporated in the drawings over the next two weeks. In particular the existing drawings do not accurately reflect fence post placement and do not reflect the proposed revisions to the Fence Preservation Plan mentioned above. Once the corrections and revisions to the plans are made and reviewed in the next two weeks we will also submit them to your office.

Because of the complexity of this project and the pending revisions to the Fence Plan and the 95% Construction drawings we would like to propose a second Web-Ex with your staff to provide additional information and to answer any questions you or your staff might have about the project or the Section 106 compliance documentation. Blair Davenport, Park Cultural Resources Manager and Richard Boston NPS Denver Service Center (DSC), Cultural Resources Compliance Specialist, and Carrie Miller DSC Historical Archeologist and author of the Fence Preservation Plan are available on February 7<sup>th</sup>, 8<sup>th</sup>, 9<sup>th</sup>, 28<sup>th</sup> or 29<sup>th</sup>. Blair Davenport will contact you by phone to confirm which of those dates works best for your staff.

If you have any questions, please do not hesitate to contact me at the above address or by email at sarah\_craighead@nps.gov or at (760) 786-3240. You may also contact Blair Davenport, Cultural Resources Manager by email at blair\_davenport@nps.gov or at (760) 786-3287. I would be more than willing to meet with you to discuss this project.

We look forward to consulting with you on this and future projects.

Sincerely yours,

  
Sarah Craighead  
Superintendent

## APPENDIX A: AGENCY CORRESPONDENCE

Enclosures:

1. Section 106 Compliance Report
2. Consensus Determination Eligibility for the National Register of Historic Places, Grapevine Canyon Archeological District
3. Consensus Determination of Eligibility for the National Register of Historic Places, Grapevine Developed Area (a Mission 66 Property)
4. Draft Programmatic Agreement
  - a. Appendix A; Fence Preservation and Rehabilitation Plan
  - b. Appendix B; Inadvertent Discovery and Monitoring Plan
5. 95% Construction Drawings
6. Compliance and Project schedule

Cc: Richard Boston, Cultural Resource Specialist, NPS Denver Service Center w/o encl.  
Blair Davenport, Cultural Resource Manager, Death Valley National Park w/o encl.  
Mike Cipra, Environmental Compliance Specialist, Death Valley National Park w/o encl.



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January 23, 2012

MAILED USPS CERTIFIED MAIL-RETURN RECEIPT

George Gholson, Chairman  
Timbisha Shoshone Tribe  
Admin Offices  
1349 Rocking W Drive  
Bishop, CA 93514

Subject: Continuation of Consultation with the Timbisha Shoshone Tribe in Compliance with Section 106 of the National Historic Preservation Act - Rehabilitation of Bonnie Clare Road, Mesquite Spring Campground Road, and Grapevine Ranger Station Parking Lot - National Park Service, Death Valley National Park

Dear Chairman Gholson,

The purpose of this letter is to: 1) Update the Timbisha Shoshone Tribe (Tribe) regarding some changes to the proposed Federal Highway Administration (FHWA) project for rehabilitating the Bonnie Clare Road, the Mesquite Spring Campground Road, and the Grapevine Ranger Station Parking Lot; 2) Establish an Area of Potential Effect (APE) for the undertaking; 3) Describe historic properties within the APE and efforts that will be made to identify and evaluate additional historic properties; 4) Assess effects on historic properties within the APE; and 5) Briefly describe the proposed Section 106 compliance path.

In accordance with Section 106 of the National Historic Preservation Act and its implementing regulation, 36 CFR 800, the National Park Service (NPS), Death Valley National Park (park), initiated consultation with the Tribe on this project with a letter on November 30, 2004. The portion of Bonnie Clare Road described below was deleted from the original project and in spring of 2010 the park restarted the project planning and began preparing an Environmental Assessment and restarted formal Section 106 consultation with your office on October 17, 2010. As part of the Section 106 compliance, the park completed a Cultural Landscape Inventory of Bonnie Clare Road within the current project area and submitted that document to your office for review on July 1, 2011.

In accordance with 36 CFR 800.4, the park has determined the area of potential effect (APE) and identified properties listed on or eligible for listing on the National Register of Historic Places (National

Register) within the APE. In accordance with 36 CFR 800.5, the park has applied the criteria for adverse effect to the historic properties. The attached *Section 106 Compliance Report* (Enclosure 1), documents the proposed project, defines the APE, identifies historic properties within the APE, and analyzes the effects of the proposed project on historic properties listed on or eligible for listing on the National Register.

### **Proposed Section 106 Compliance Path**

Since beginning formal Section 106 Consultation with the Tribe, the park has completed and submitted to your office a Cultural Landscape Inventory of Bonnie Clare Road. As a result of the Cultural Landscape investigation the park proposes to eventually nominate the Bonnie Clare Road to the National Register of Historic Places.

The park has also completed evaluations for two other historic properties: Grapevine Developed Area Historic District (includes Grapevine Ranger Station, Apartments, and Maintenance Yard - a Mission 66 Property), and, Grapevine Canyon Archeological District. The results of those evaluations are enclosed for your review (Enclosures 2 and 3).

Because we do not know the exact extent of all impacts to the identified Historic Properties within the APE we have drafted a Programmatic Agreement (PA) for your review and comment (Enclosure 4). Because we do know that the Bonnie Clare Road project will have an adverse effect on the historic concrete post and wire fence adjacent to the road, we have prepared a Fence Preservation Plan (included in the PA as Appendix A). The intent of the Fence Preservation Plan is to mitigate the adverse effects to the Death Valley Scotty Historic District. Currently the boundary fence is in fair to poor condition, as described in the CLI. Some of the changes proposed in the Bonnie Clare Road project will necessitate the removal of additional fence posts. The Fence Plan describes 1) the attempts to save as many of the existing concrete posts as possible; 2) details for constructing new replacement posts; and 3) a proposed alignment of the reconstructed fenceline.

### **Proposed Mitigation**

To mitigate the Adverse Effect to the Bonnie Clare Road, the park proposes to prepare an Historic American Engineering Record to document the Bonnie Clare Road Historic Property and surrounding landscape.

To mitigate the Adverse Effect to Grapevine Canyon Archeological District, the park proposes to continue to work with the Tribe and the California SHPO to nominate the Grapevine Canyon Archeological District for listing on the National Register of Historic Places.

The park proposes to mitigate the adverse effects to the historic fence at Scotty's Castle and by extension the effect to Death Valley Scotty Historic District with a Fence Preservation Plan (see Appendix A of the PA) that would outline actions to preserve, rehabilitate, restore, and/or reconstruct the affected historic fenceline in a manner that meets the Secretary of the Interior's Standards for the Treatment of Historic Properties. The Fence Preservation Plan would also document the appearance, integrity, and condition of the fenceline, and, recommend appropriate preservation and management measures that would not adversely affect significant character-defining features of the fenceline, the Death Valley Scotty Historic District, or the cultural landscape. Currently the boundary fence is in poor to

fair condition. We hope to have a revised fence plan prepared and submitted to you for review in early February.

The Park plans to avoid impacts to archeological resources through contract language requiring the construction contractor to attend pre-construction meetings with park archeologists and appropriate Tribal representatives as identified by the park. During these meetings, park personnel and the contractor would develop archeological site protection and avoidance measures that would be implemented prior to initiating construction activities.

In addition, the park would develop a plan of action for inadvertent archeological discoveries during construction. The avoidance measures and inadvertent discovery plan of action would be documented in an Inadvertent Discovery and Monitoring Plan (Appendix B of the PA). The plan would outline which locations would undergo archeological monitoring during construction and who would perform the monitoring (e.g., park archeologist, Timbisha Shoshone tribal monitors, etc.). The plan would also outline the procedures to be taken if an inadvertent discovery is made by the construction contractor or the monitors.

The Inadvertent Discovery and Monitoring Plan also serves to avoid adverse effects to Indian Camp and provide a plan of action should intact deposits within the site be found during construction.

A copy of the draft 95% construction drawings and specifications are forthcoming - the FHWA and park recently concluded a review of the draft 95% construction drawings and found a number of discrepancies. These discrepancies and some additional measures designed to mitigate impacts to primarily cultural resources will be incorporated in the drawings over the next two weeks. Once the corrections and revisions to the plans are made and reviewed in the next two weeks, the park will submit them to your office for review.

If you have any questions, please do not hesitate to contact me at the above address or by email at [sarah\\_craighead@nps.gov](mailto:sarah_craighead@nps.gov) or at (760) 786-3240. You may also contact Blair Davenport, Cultural Resources Manager by email at [blair\\_davenport@nps.gov](mailto:blair_davenport@nps.gov) or at (760) 786-3287. I would be more than willing to meet with you to discuss this project.

We look forward to consulting with you on this and future projects.

Sincerely yours,



Sarah Craighead  
Superintendent

Enclosures:

1. Section 106 Compliance Report
2. Consensus Determination of Eligibility for the National Register of Historic Places, Grapevine Developed Area Historic District (a Mission 66 Property)
3. Consensus Determination of Eligibility for the National Register of Historic Places, Grapevine Canyon Archeological District

## APPENDIX A: AGENCY CORRESPONDENCE

4. Draft Programmatic Agreement
  - a. Appendix A; Fence Preservation and Rehabilitation Plan
  - b. Appendix B; Inadvertent Discovery and Monitoring Plan

Cc: Richard Boston, Cultural Resource Specialist, NPS Denver Service Center w/o encl.  
Blair Davenport, Cultural Resource Manager, Death Valley National Park w/o encl.  
Mike Cipra, Environmental Compliance Specialist, Death Valley National Park w/o encl.



United States Department of the Interior  
NATIONAL PARK SERVICE  
Death Valley National Park  
P.O. Box 579  
Death Valley, CA 92328

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January 23, 2012

MAILED USPS CERTIFIED MAIL-RETURN RECEIPT

Mr. Reid Nelson  
Director, Office of Federal Agency Programs  
Advisory Council on Historic Preservation  
1100 Pennsylvania Avenue, NW, Suite 803  
Old Post Office Building  
Washington, DC 20004

Subject: 36 CFR 800.6(a)(1), Assessment of Effect and Consultation under the National Historic Preservation Act Section 106 Regarding a Proposed Federal Undertaking; Reconstruction of Bonnie Clare Road, Reconstruction of Grapevine Ranger Station Parking Lot and Sidewalks, and Resurfacing Mesquite Spring Campground at Death Valley National Park

Dear Mr. Nelson,

In accordance with 36 CFR Part 800, Appendix A – *Criteria for Council Involvement in Reviewing Individual section 106 Cases*, the National Park Service (NPS), Death Valley National Park (park), seeks to initiate National Historic Preservation Act (NHPA) Section 106 review with the Advisory Council on Historic Preservation (ACHP) of the proposed federal undertaking. The proposed undertaking has the potential to adversely effect historic properties that are of unusual or noteworthy importance and to adversely effect multiple properties within a historic district (36 CFR Part 800 Appendix A (C)(1)). The NPS has evaluated potential effects to historic properties concurrently with the preparation of an environmental assessment, and has drafted a programmatic agreement (PA) to address mitigation effects to historic properties. In accordance with 36 CFR Part 800 Appendix A (C)(2) the NPS invites the ACHP to participate in the Programmatic Agreement which outlines a process whereby plans for the treatment of historic properties at the park would be coordinated and reviewed.

The purpose of this letter is to: 1) Initiate NHPA Section 106 review of a proposed federal undertaking; 2) Describe the proposed undertaking, 3) Establish an area of potential effect (APE) for the undertaking; 4) Describe the steps taken to identify historic properties, 5) Describe affected historic properties, 6) Describe the undertaking's effects on historic properties, 7) Explanation of why the criteria of adverse effect were found applicable or inapplicable; 8) Copies or summaries of any views provided by consulting parties and the public, including comments from the Timbisha

Shoshone Tribal Historic Preservation Officer (THPO), the Timbisha Shoshone Tribe, and the California State Historic Preservation Officer (SHPO); and 9) Describe Section 106 Compliance Strategy.

**Initiation of Section 106 Consultation**

In accordance with ACHP regulations, 36 CFR Part 800: Protection of Historic Properties, the NPS will comply with Section 106 of the National Historic Preservation Act of 1966, as amended. This letter serves to initiate Section 106 consultation with your office. Section 106 consultation has also been initiated with the identified Timbisha Shoshone Tribe and the California SHPO.

**Description of the Proposed Undertaking**

The NPS and park, in partnership with the Federal Highway Administration (FHWA) proposes to improve two roads and a parking lot in the northern area of the park. The proposed project involves the reconstruction of Bonnie Clare Road by realigning the road in some locations up to 20 feet and expanding the road's width to 22 feet over the majority of the road. The existing asphalt would be removed and new asphalt would be applied over the road. Low water crossings would be installed where the natural water drainages run perpendicular to the road. The proposed project also calls for the removal of existing asphalt and a portion of the existing sidewalk at Grapevine Ranger Station. That asphalt would be replaced with new asphalt and the sidewalk would be reconstructed in compliance with the standards established by the Americans with Disabilities Act including a new wheelchair ramp. The final component of the project calls for removal and replacement of the asphalt along Mesquite Spring Campground Road and the installation of low water crossings where natural drainages run perpendicular to the road. A detailed project description is provided in the attached Section 106 Compliance report.

This proposed project, *Reconstruction of Bonnie Clare Road, Reconstruction of Grapevine Ranger Station Parking Lot and Sidewalks, and Resurfacing Mesquite Spring Campground at Death Valley National Park*, is considered a Federal Undertaking and is subject to NHPA Section 106 compliance.

**Definition of the APE**

Section 106 of 36 CFR 800.4(a)1 requires that a federal agency, once it has determined a project has the potential to affect historic properties, must establish the APE(s) for a proposed project and identify if there are any historic properties within the APE(s) listed in or eligible for listing in the national register.

The APE for effects of the proposed project includes any area where there may be ground disturbance, demolition, or construction activities. This would include all areas within the temporary and permanent right-of-way required for the project and all areas within the "clearing limits" as indicated on the road construction plans. Some of the riprap areas along Bonnie Clare Road indicated on the road plans extend outside the clearing limits. At MP 5.8, the riprap extends approximately 26 feet to the north of the clearing limits, but the average extent to which the riprap extends outside the clearing limits is approximately 12 feet. These riprap areas are within the direct effect APE for the project. The area along the road where the historic fence would be moved (outside of the 7 feet clear recovery zone) is also within the direct effect APE for the project.

The APE for effects for the proposed project also includes areas that would not be impacted directly by construction-related activities, but may be visually or audibly impacted or that may be impacted by an off-site construction-related activity (e.g., construction of wetland mitigation area or borrow areas). Effects can be temporary (e.g. construction-related noise) or permanent (e.g., changing the viewshed). For this project, if any portion of a NRHP-eligible or -listed historic property is within the



APE, then the entire historic property is included in the APE (see Section 106 Compliance Report for complete description and maps of the APE – Enclosure 1).

**Description of the Steps to Identify Historic Properties**

Several archeological investigations have been conducted in Grapevine Canyon and around the Death Valley Scotty Historic District, including the Scotty's Castle area and the Lower Vine Ranch area (Wallace 1977; Wallace and Wallace 1978; Pearson 2003; NPS 2010; Brown 2004; Bergstressor n.p.; Johnson 2006). As a result of these investigations, several archeological sites were recorded in the area and the park has identified a potential archeological district in the area. The Grapevine Canyon Archeological District contains both historic and pre-contact archeological sites including rockshelters, campsites, house pits, lithic scatters, lithic procurement sites, hunting blinds, historic dump sites, and winter villages. Sites in the district span the last 5,000 years and have the potential to provide data regarding use of the area from 5,000 years ago until the ethnographic and historic eras. As a natural passage between the Sarcobatus Flats and Death Valley the area was a pre-contact travel and trade corridor, as indicated by artifacts from the area that have been dated and sourced (Johnson 2006). The district may provide insight into the cyclical use patterns of the area, trade patterns, and the transition of Native lifeways and technologies.

The area adjacent to Mesquite Spring Campground Road was initially surveyed in 1993 and additional investigations were conducted in 2009 and 2010. As a result of these investigations, 12 archeological sites were recorded near Mesquite Spring Campground Road. In May and October 2011 in support of the proposed project, park archeologists performed additional investigations adjacent and parallel to both sides of Mesquite Spring Campground Road. As a result of this investigation, four sites and four isolated occurrences were documented within 10 meters of the centerline of the road placing them within or adjacent to the APE for the project.

In 2010 and 2011 the NPS evaluated Bonnie Clare Road Historic Property and on July 1, 2011, submitted a cultural landscape inventory (CLI) / determination eligibility for Bonnie Clare Road was submitted to the SHPO for concurrence. The CLI determined that Bonnie Clare Road Historic Property is eligible for nomination to the National Register of Historic Places (NRHP) and sought CA SHPO concurrence.

In 2012 the NPS also evaluated Grapevine Developed Area Historic District, a NPS Mission 66 property that includes Grapevine Ranger Station and parking lot. The evaluation determined that the Grapevine Developed Area Historic District is eligible for nomination to the NRHP (see Grapevine Developed Area Historic District Consensus Determination of Eligibility - Enclosure 3).

The NPS contracted with AArcher Inc. to evaluate Grapevine Canyon Archeological District (see Grapevine Canyon Archeological District Consensus Determination of Eligibility, Carmany-George 2012 – Enclosure 4).

**Description of Affected Historic Properties**

**Description of Bonnie Clare Road**

Bonnie Clare Road is a historic property that meets criteria A and C for listing in the National Register on a local level for its association with the early NPS Mission 66 improvement program. Immediately following World War II, automobile tourism within the national parks increased significantly, taking a heavy toll on the roads and other infrastructure in the parks. The improvements to Bonnie Clare Road in 1947, 1948, and 1951 represent a formalization of the road as a major circulation feature of the park. The improvements were implemented to upgrade the road to contemporary safety

standards and represent the continued philosophy of the park for roads to be as unobtrusive on the landscape as possible. The 1947, 1948, and 1951 improvements responded to the need to improve safety for the increasing numbers of post-war tourists in their automobiles (NPS 2011b). The project bisects the proposed Grapevine Canyon Archeological District within Grapevine Canyon, and there are ten sites in or adjacent to the APE for direct effects for the project. Each site is discussed below within the section of the APE where they are located by milepost (MP). These sites have not been individually evaluated for National Register eligibility; however, the park staff is treating them as contributing features of the potentially eligible Grapevine Canyon Archeological District until they have been individually evaluated or the archeological district has been evaluated for National Register eligibility.

**Description of Grapevine Canyon Archeological District**

The Grapevine Canyon Archeological District contains 46 individual archeological sites—44 contributing archeological sites and two noncontributing sites, and 19 archeological isolates—17 contributing and two noncontributing. The district is determined eligible for the national register on a local level under Criterion A for its association with the American Indian ethnic heritage and transportation. The district is also eligible on a local level under criterion D for the precontact and historic archeological information it has and is likely to yield regarding American Indian economics, industry, and social history. The period of significance for the Grapevine Canyon Archeological District spans the age of American Indian archeological materials in the canyon from 3000 BC to the 1930s. Based on the ethnographic importance of the canyon's natural landscape and cultural resources, the district boundary incorporates the entire canyon including the canyon walls and the sites on the alluvial fan at the west end of the canyon (Carmany-George 2012).

**Description of Death Valley Scotty Historic District (Scotty's Castle)**

The Death Valley Scotty Historic District (Scotty's Castle) is the only development along Bonnie Clare Road and extends for approximately 2.6 miles along the north and west sides of Bonnie Clare Road. The historic district was listed in the national register in 1978 and meets the National Park Service definition of a cultural landscape. A cultural landscape inventory of the historic district was completed in 2005 (NPS 2005) and the California SHPO concurred with the findings of the inventory on September 28, 2005 (with the exception of changing the period of significance). The historic district is listed under criteria B and C on a regional level for its significance in 20th century architecture, folklore, and social history, and on a local level for its significance in archeology, art, and invention. The property's period of significance is 1922 to 1931.

A cultural landscape inventory (NPS 2005) and list of classified structures identified 21 historic structures at Scotty's Castle currently listed in the national register and identified nine additional historic structures that are eligible, including the entrance road and roads throughout the complex, historic rock walls, and the watercourse. The fence that surrounds the historic district is a contributing feature and forms the boundary defining the district (NPS 1978).

**Description of Death Valley Scotty Historic District (Scotty's Castle) – Fenceline**

The historic fence that forms the boundary of the property is a unique structure. A survey of the 574 fence posts adjacent to Bonnie Clare Road was conducted in April 2011. The purpose of the survey was to inventory the fence posts and record details of type, height, markings, materials, and condition for each post. The survey was limited to the approximately 2.6 miles of historic fence that parallel Bonnie Clare Road and did not include the remaining 3.14 miles of fence around Scotty's

Castle or the approximately 6.0 miles of fence around Lower Vine Ranch. Even though the fence has deteriorated with age and weathering, it continues to retain its integrity of feeling, association, design, materials, workmanship, setting, and location as a contributing feature to Scotty's Castle, and it continues to visually delineate the historic district's boundary along Bonnie Clare Road.

**Description of Death Valley Scotty Historic District (Scotty's Castle) - Indian Camp**

Indian Camp (site CA-INY-5702H) was recorded as an archeological site in the late 1990s by Brewer et al. (2000) and is bisected by Bonnie Clare Road. The site is a multicomponent precontact American Indian lithic scatter and historic American Indian habitation site that is a contributing feature of Death Valley Scotty Historic District. The site is approximately 32,063 square meters.

Indian Camp archeological site has been impacted in the past by the widening and paving of Bonnie Clare Road in 1951, the "cleanup" of the area in the 1970s by the National Park Service, which included bulldozing and burning camp remains, grading the area on the north side of the road for a parking lot, and vegetation removal on the north side of the road (Johnson 2006). The small-scale archeological excavations at Indian Camp resulted in the determination that surface artifact density does not directly correlate to subsurface density and is not a good indicator of the probability for intact or partially intact subsurface features (Pearson 2003).

**Description of Death Valley Scotty Historic District (Scotty's Castle) – Entrance Gate**

Construction on Scotty's Castle entrance gate, designed by Charles MacNeilledge, began in 1928; the entrance road and entrance gate dam were built in 1930 by American Indian laborers. The entrance gate is in a Spanish style with two crenellated towers, each two-stories high (figure 20). Large wooden gates are attached to the towers using hand-wrought iron fittings. In 1930, an extensive amount of grading occurred near the entrance and fill was added to raise the roadbed at the entrance gate; a small lake was excavated to hold water from the spring that was channeled through two watercourses north of Bonnie Clare Road toward the entrance. On the west side of the gate, a dam was built to contain the water, and the dike (which was actually the entrance road prism) served to channel water under the bridging entrance gate (NPS 2005). Immediately east of the entrance road and gate is a tree and grapevine-lined, spring-fed water course/stream that parallels the road and flows toward the gate.

The 2005 cultural landscape inventory for Scotty's Castle reports that the entrance gate and entry road still convey a sense of arrival and a transition between public and private space. The gate has been closed to the public, but it and the entrance road still retain their integrity as entrance features to Scotty's Castle, as an "impressive approach" (NPS 2005). The stream is also in historic condition.

**Description of Death Valley Scotty Historic District (Scotty's Castle) - Cottonwood Corner**

Cottonwood Corner was created by Johnson in 1931 by constructing an S-curve in Bonnie Clare Road that acted as an earthen dam to direct water from a nearby spring onto his property. Johnson and his construction supervisor, Roy Thompson, designed Cottonwood Corner to be a pleasing, green approach to Scotty's Castle from the south and the S-curve became an important part of the approach to Scotty's Castle (NPS 2005).

In accordance with the Timbisha Homeland Act of 2000, the park and the Timbisha Shoshone Tribe are to coordinate efforts for the preservation of natural and cultural resources. Cottonwood Corner has been identified by the Timbisha Shoshone as a spring site that should be managed in a

traditional manner. The park staff and the Timbisha work together to manage the wetland and spring area (Bonstead 2010). The 2005 cultural landscape inventory conducted by the park documented: "greenery at the entrance gate and Cottonwood Corner closely resembles historic conditions and original design," however, it notes that the dam at Cottonwood Corner has eroded away (NPS 2005).

**Description of Grapevine Developed Area Historic District**

The Grapevine Developed Area, including the ranger station, parking lots, landscaping, four-unit apartment building, utility building, and road in the maintenance area, were constructed between 1964 and 1965 at the end of the NPS Mission 66 capital improvement program. The park has recently determined that the area is eligible for the national register on a local level under criterion A for its association with the Mission 66 program as the only intact example in the park representing Mission 66 development with both visitor and park support services. The area is also eligible under criterion C on a local level because it embodies distinct Mission 66 planning and architectural characteristics and is a representation of modern park planning and infrastructure in the park.

There are three contributing buildings (four-unit apartment, utility building, and ranger station) and one contributing structure (road in the maintenance area) within the district (NPS 2011c). The Grapevine Ranger Station and associated exterior railing, semicircular parking lot and median, curbing around the parking lot and median, landscaping, ranger station sign, and water spigot are within or adjacent to the project area. The remaining contributing features of the Grapevine Developed Area Historic District are visually obscured from the project by topography and vegetation. The APE for effects encompasses the entire proposed district. The ranger station is a modern design with a horizontal look and flat roof and is of pinkish-brown concrete. The design and color allow the building to blend in with its desert environment, which was a Mission 66 design tenant. The parking lot is currently asphalt and the sidewalk, curbs, and gutters are concrete (NPS 2011c). There is a limited amount of vegetation adjacent to the parking lot, parking lot median, and the sidewalks that may be disturbed by the proposed project.

**Description of Historic Properties along Mesquite Spring Campground Road**

The potentially National Register eligible Mesquite Spring Campground Historic District, including the comfort stations, amphitheater, chlorination house and associated landscaping, were built in 1959 during the Mission 66 capital improvement campaign near the natural spring. Mission 66 was the National Park Service ten-year development and capital improvement plan implemented in parks across the country from 1956 until 1966 to meet the needs of the ever-increasing number of post-World War II park visitors. The Mesquite Spring Campground Historic District has not been evaluated for eligibility for listing on the National Register. Therefore, the NPS treats the area as a National Register eligible historic district and cultural landscape and will continue to do so until a formal eligibility determination is made. The campground is outside the APE for the proposed project.

Archeological Site CA-INY-04851H is a historic two-track road that is approximately 492 feet long that is bisected by the road that is 0.3 miles south of the intersection with Route 5/Scotty's Castle Road. However, there were no archeological resources at site CA-INY-04851H recorded within the area disturbed by previous road construction activities (McCuiston 2011). Site CA-INY-04822 is a multicomponent cleared rock ring and historic isolate 33 feet from the road centerline 0.5 miles south of the intersection with Route 5/Scotty's Castle Road. Site CA-INY04734H is a multi-component historic road and scatter and pre-contact lithic scatter. It consists of two road segments

that parallel Mesquite Spring Campground Road. The northern most section of road segment varies between 56 and 85 feet from the centerline of Mesquite Spring Campground Road and the southern segment varies between approximately 174 feet from the centerline of Mesquite Spring Campground Road to intersecting Mesquite Spring Campground Road approximately 1.3 miles south of the intersection with Route 5/Scotty's Castle Road. Site CA-INY-04852H is a historic trash dump that is 26 feet from the road centerline 1.4 miles south of the intersection with Route 5/Scotty's Castle Road. These sites have not been evaluated for National Register eligibility and will be treated as eligible until they have been tested (NPS 2010).

**Description of the Undertaking's Effects on Historic Properties**

**Assessment of Effects to Bonnie Clare Road**

The following summary of the project's effects to the character defining features of Bonnie Clare Road that are identified in the Cultural Landscape Inventory (NPS 2011). Overall the proposed project would adversely affect the design, materials, and workmanship of the Bonnie Clare Road historic property.

**Summary of Effects to Bonnie Clare Road Historic Property**

Character Defining Features (Identified in the Cultural Landscape Inventory)	Assessment of Effect
<b>Natural Systems and Features</b>	
Geomorphology/Geology	Adverse Effect
Vegetation/Springs	No Adverse Effect
<b>Spatial Organization</b>	
Alignment	Adverse Effect
Undulating Grade	Adverse Effect
Width	Adverse Effect
Shoulders and Turnouts	Adverse Effect
Historic Fenceline	No Adverse Effect
<b>Topography</b>	
Grade	No Adverse Effect
Cross-Section	Adverse Effect
Vertical Rock Cuts	Adverse Effect
Fill	No Adverse Effect
<b>Views and Vistas</b>	
Chimes Tower and Entrance Gate	No Adverse Effect
Tin Mountain	No Adverse Effect
Cottonwood Corner and Cathedral Rock	No Adverse Effect

**Assessment of Effects to Grapevine Canyon Archeological District**

The entire project area along Bonnie Clare Road from Ubehebe Crater Road intersection east to the California/Nevada state line is located within the boundaries of the Grapevine Canyon Archeological District. The NPS plans to avoid impacts to individual archeological resources and by extension to the Grapevine Canyon Archeological District by implementation of an Inadvertent Discovery and Plan (attached) and through contract language requiring the construction contractor to attend pre-construction meetings with park archeologists and other appropriate NPS personnel and consulting

parties as identified by the park. During these meetings, the park personnel and contractor would develop archeological site protection and avoidance measures that would be implemented prior to initiating construction activities. The types of measures that may be developed would be site and action specific but could include the presence of archeological and/or Timbisha monitors during construction activities and/or the use of temporary fencing or other materials to establish construction boundaries near sites.

Preconstruction meetings and the development and implementation of the proposed archeological monitoring and inadvertent discovery plan would result in avoidance of contributing archeological deposits within the Grapevine Canyon Archeological District. However, effects to the natural resources that are ethnographically significant to the Timbisha and that bind the property into a contiguous district, specifically the canyon walls that would be modified, would result in an *adverse effect* to the Grapevine Canyon Archeological District.

**Assessment of Effects to Death Valley Scotty Historic District (Scotty's Castle)**

The following discussion is presented by effects to the character-defining features of Scotty's Castle adjacent to the project area followed by an assessment of the undertaking to the entire Death Valley Scotty Historic District.

**Fenceline**

The relocation of segments of the fence from its original location to 7 feet from the edge of the newly paved road surface would be an *adverse effect* to the fence, which is a contributing feature of Scotty's Castle.

**Indian Camp**

The proposed design minimizes adverse effects to Indian Camp by limiting the vertical and horizontal disturbance to previously disturbed areas. However, there is a possibility that intact deposits could exist under the road surface, which would be removed as part of the project. As a result, the project may have an *adverse effect* on the Indian Camp archeological site (CA-INY-05702H).

**Entrance Gate**

The project would not affect the location, design, setting, workmanship, feeling or association of the Entrance Gate or 90% of the entrance gate, approach road, or stream that runs beneath the Gate. Therefore, adding pavement to 6 feet of the historic entrance road and the minor shift of road alignment at the entrance gate would have *no adverse effect* on the entrance road, gate or stream.

**Cottonwood Corner**

The road would shift slightly south and east, away from Cottonwood Corner. The clearing limits for the project do not extend into the vegetated areas at the S-curve. No fence posts would be relocated within the wetland or vegetated area at Cottonwood Corner. An underdrain to direct water from a spring under the road would be placed at this location. In addition, riprap would be added to the west side of the corner next to the road to reduce erosion into the spring. The steeply sloped area on the east side would be cut and the area would be used as a staging area (MP 5.9). Cottonwood Corner would not be affected by



these actions, which largely occur on the opposite side of the road. There would be *no adverse effect* to the historic characteristics of Cottonwood Corner.

**Assessment of Effects to Grapevine Developed Area Historic District**

The Secretary of Interior's Standards for Rehabilitation would be used to match the materials for the new sidewalk, ramp, gutters, and curbs in color and design. There would be no change in the footprint, design, setting, feeling, materials, location, association, or use of the parking lot or sidewalks. Changes to the elevation of the parking lot or the sidewalk would not substantially change, obscure, or destroy any portion of the historic district and would not drastically change their relationship to the Ranger Station building or the other features of the historic district. Overall, the proposed project would have *no adverse effect* to the Grapevine Developed Area Historic District or its individual features.

**Assessment of Effects to Historic Properties along Mesquite Spring Campground Road**

The archeological sites within the campground area are outside the APE for the proposed work and would not be affected by the project. The proposed work is to remain within the existing road prism with the exception of low water crossings. There are four archeological sites within or adjacent to the APE for the road resurfacing, and there are no recorded archeological deposits from sites CA-INY-4822, CA-INY-4851H, or CA-INY-4852H within the existing road prism. A portion of the old road at site CA-INY-04734H encroaches onto the existing road prism, but there are no recorded artifacts associated with this site within the APE for the project. Development and implementation of the proposed archeological monitoring and inadvertent discovery plan would result in avoidance of archeological deposits within the APE and there would be *no adverse effect* to archeological resources.

**Explanation of Why the Criteria of Adverse Effect Were Found Applicable**

As per 36CFR § 800.5, an adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.

**Summaries of Views Provided by Consulting Parties and the Public**

The NPS has consulted with CA SHPO, the Timbisha Shoshone Tribe and the Timbisha Shoshone THPO regarding the proposed undertaking the identified historic properties and the assessments of effects to each historic property. The NPS has and shall continue to consider any views concerning such effects by the consulting parties and the public. To date there have been no comments on the proposed undertaking. An Environmental Analysis is being prepared for the project and will be provided to the public for comment in late February 2012.

**Description of Section 106 Compliance Strategy**

The NPS has evaluated potential effects to historic properties concurrently with the preparation of an environmental assessment, and has drafted a programmatic agreement (PA) to address mitigation effects to historic properties (Enclosure 2).



## APPENDIX A: AGENCY CORRESPONDENCE

The park invites the ACHP to participate in the PA which outlines a process whereby plans for the treatment of historic properties at the park would be coordinated and reviewed. Pursuant to 36 CFR §800.6(b)(1)(iv), the park will file the final PA, developed in consultation with the California SHPO and any other consulting parties, and related documentation with the ACHP at the conclusion of the consultation process. The filing of the PA and supporting documentation with the ACHP is required in order to complete the requirements of Section 106 of the National Historic Preservation Act.

If you would like to participate in the Programmatic Agreement or have any comments or questions about the proposed undertaking, please do not hesitate to contact me at the above address or by email at [sarah\\_craighead@nps.gov](mailto:sarah_craighead@nps.gov) or at (760) 786-3240. You may also contact Blair Davenport, Cultural Resources Manager by email at [blair\\_davenport@nps.gov](mailto:blair_davenport@nps.gov) or at (760) 786-3287.

Sincerely,



Sarah Craighead  
Superintendent

Enclosures:

1. Section 106 Compliance Report
2. Draft Programmatic Agreement
  - a. Appendix A; Fence Preservation and Rehabilitation Plan
  - b. Appendix B; Inadvertent Discovery and Monitoring Plan
3. Consensus Determination of Eligibility for the National Register of Historic Places, Grapevine Developed Area Historic District (a Mission 66 Property)
4. Consensus Determination Eligibility for the National Register of Historic Places, Grapevine Canyon Archeological District
5. 95% Construction Drawings

Cc: Timbisha Tribe  
CA SHPO  
Richard Boston, Cultural Resource Specialist, NPS Denver Service Center w/o encl.  
Blair Davenport, Cultural Resource Manager, Death Valley National Park w/o encl.  
Mike Cipra, Environmental Compliance Specialist, Death Valley National Park w/o encl.

## **APPENDIX B: PUBLIC SCOPING**



[Logo National Park Service  
NPS] U.S. Department of the Interior

Death Valley National Park

CA Highway 190  
PO Box 579  
Death Valley, CA 92328  
Telephone 760.786.3200  
Facsimile 760.786.3246

## **Death Valley News Release**

Release: **FOR IMMEDIATE RELEASE**  
Release Date: October 29, 2010  
Contact: Victoria Wilkins  
Phone: 760-786-3227

### **Scoping Notice Bonnie Clare Road Rehabilitation Environmental Assessment Death Valley National Park**

The National Park Service (NPS) proposes to rehabilitate seven miles of the Bonnie Clare Road, commonly referred to as Grapevine Canyon Road, from milepost 7.0 north of the Ubehebe Crater Road intersection to the northeast boundary of Death Valley National Park (Park). This section of Bonnie Clare Road is narrow, has alignment issues, and has deteriorated over the years, presenting a hazard to vehicular travel in the Park.

Grapevine Canyon Road serves as an access point for the northeastern boundary of the Park and is the most direct route of travel for visitors coming from Tonopah, NV. It provides access to the Grapevine and Last Chance mountain ranges in the Park, which includes the historic Scotty's Castle, Ubehebe Crater, Mesquite Spring, and several backcountry sites. The current asphalt pavement is deteriorating, contains road reaches with poor site distance, is narrow, and presents a safety concern. The project includes some in-place recycling and hot asphalt overlay of approximately four miles, and reconstruction, widening, and some realignment of approximately three miles of roadway.

The Bonnie Clare Road is an important ethnographic and historic resource. It was a significant prehistoric travel corridor for the Timbisha Shoshone Tribe who live within the park boundaries, and, portions of the road are adjacent to the Death Valley Scotty Historic District (listed on the National Register of Historic Places in 1978). An Ethnographic Report for the Bonnie Clare Road was completed in 2006. The NPS is currently writing a Determination of Eligibility for listing the Bonnie CLARE Road on the National Register. The park has completed Historic Structure Reports (1991 and 2009), a Historic Resource Study (2009), and a draft Cultural Landscape Report (2009) for the Historic District, as well as a park-wide Road Systems Evaluation (1996). These documents and studies will be used to inform decision making and analysis of project impacts.

Comments are currently being accepted on this proposal and will be used in the development of the Environmental Assessment. Comments must be received no later than December 1, 2010. Comments may be submitted online at the NPS Planning, Environment, and Public Comment website: <http://parkplanning.nps.gov/deva>. The website also contains a description of the alternatives being proposed. If you do not have website access, you may direct comments regarding this project to the Park in writing by mail or hand delivery to:

Death Valley National Park  
ATTENTION: Bonnie Clare Road Rehabilitation Comments  
P.O. Box 579  
Death Valley, CA 92328

#### **EXPERIENCEYOURAMERICA**

The National Park Service cares for special places saved by the American people so that all may experience our heritage.

## APPENDIX B: PUBLIC SCOPING

[Logo      National Park Service  
NPS]      U.S. Department of the Interior

Death Valley National Park

CA Highway 190  
PO Box 579  
Death Valley, CA 92328  
Telephone 760.786.3200  
Facsimile 760.786.3246

### Notice Regarding Freedom of Information Act (FOIA)

It is the practice of the NPS to make all comments, including names and addresses of respondents who provide that information, available for public review following the conclusion of the environmental assessment process. Individuals may request that the NPS withhold their name and/or address from public disclosure. To do so, you must state this request prominently at the beginning of your comment. Commentators using the website can make such a request by checking the box "keep my contact information private." NPS will honor privacy requests to the extent allowable by law, but you should be aware that NPS may still be required to disclose your name and address pursuant to the FOIA. We will make all submissions from organizations, businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses available for public inspection in their entirety.

-NPS-

EXPERIENCEYOURAMERICA

The National Park Service cares for special places saved by the American people so that all may  
experience our heritage.



## United States Department of the Interior

NATIONAL PARK SERVICE  
Death Valley National Park  
PO Box 579  
Death Valley, California 92328



IN REPLY REFER TO:  
L2431

October 27, 2010

**Subject: Rehabilitation of Bonnie Clare Road through Grapevine Canyon from M.P. 7.0 to MP 0.0 at Death Valley National Park**

Dear Interested Parties,

The National Park Service (NPS) at Death Valley National Park (Park) is seeking comments regarding a proposed project involving the rehabilitation of Bonnie Clare Road. The National Park Service proposes to rehabilitate seven miles of Bonnie Clare Road, commonly referred to as Grapevine Canyon Road, from milepost 7.0 north of the Ubehebe Crater Road intersection to the northeast boundary of the Park. This section of Bonnie Clare Road is narrow, has alignment issues, and has deteriorated over the years, presenting a hazard to vehicular travel in the Park.

Grapevine Canyon Road serves as an access point for the northeastern boundary of the Park and is the most direct route of travel for visitors coming from Tonopah, Nevada. The road provides access to the Grapevine and Last Chance mountain ranges in the Park, which includes historic Scotty's Castle, Ubehebe Crater, Mesquite Spring, and several backcountry sites. The current asphalt pavement is deteriorating, contains road reaches with poor site distance, is narrow, and presents a safety concern. The project includes some in-place recycling and hot asphalt overlay of approximately four miles, and reconstruction, widening, and some realignment of approximately three miles of roadway.

Bonnie Clare Road is an important ethnographic and historic resource. It was a significant prehistoric travel corridor for the Timbisha Shoshone Tribe who continues to live within Park boundaries, and portions of the road are adjacent to the Death Valley Scotty Historic District (listed on the National Register of Historic Places in 1978). An ethnographic report for Bonnie Clare Road was completed in 2006. The National Park Service is currently writing a Determination of Eligibility for listing Bonnie Clare Road on the National Register. The Park has completed historic structure reports (1991 and 2009), a historic resource study (2009), and a draft cultural landscape report (2009) for the Historic District, as well as a park-wide road systems evaluation (1996). These documents and studies will be used to inform decision making and analysis of project impacts.

We welcome your input on the proposed project and will provide you a copy of the environmental assessment (EA) when it is completed, which documents anticipated project effects on natural and cultural resources. Comments are currently being accepted on this proposal and those received will be used in development of the EA. Comments must be received no later than November 30, 2010. Comments may be submitted online at the NPS Planning, Environment, and Public Comment Website: <http://parkplanning.nps.gov/deva>. The website also contains a description of the alternatives being proposed. If you do not have internet access, you may send your comments through the mail to:

## APPENDIX B: PUBLIC SCOPING

Death Valley National Park  
ATTENTION: Bonnie Clare Road Rehabilitation Comments  
Victoria Wilkins  
PO Box 579  
Death Valley, CA 92328

Thank you for your assistance. Should you have any questions, please contact Victoria Wilkins, Environmental Protection Specialist, at 760-786-3227; or Linda Manning, Wildlife Biologist, at 760-786-3252.

Sincerely,

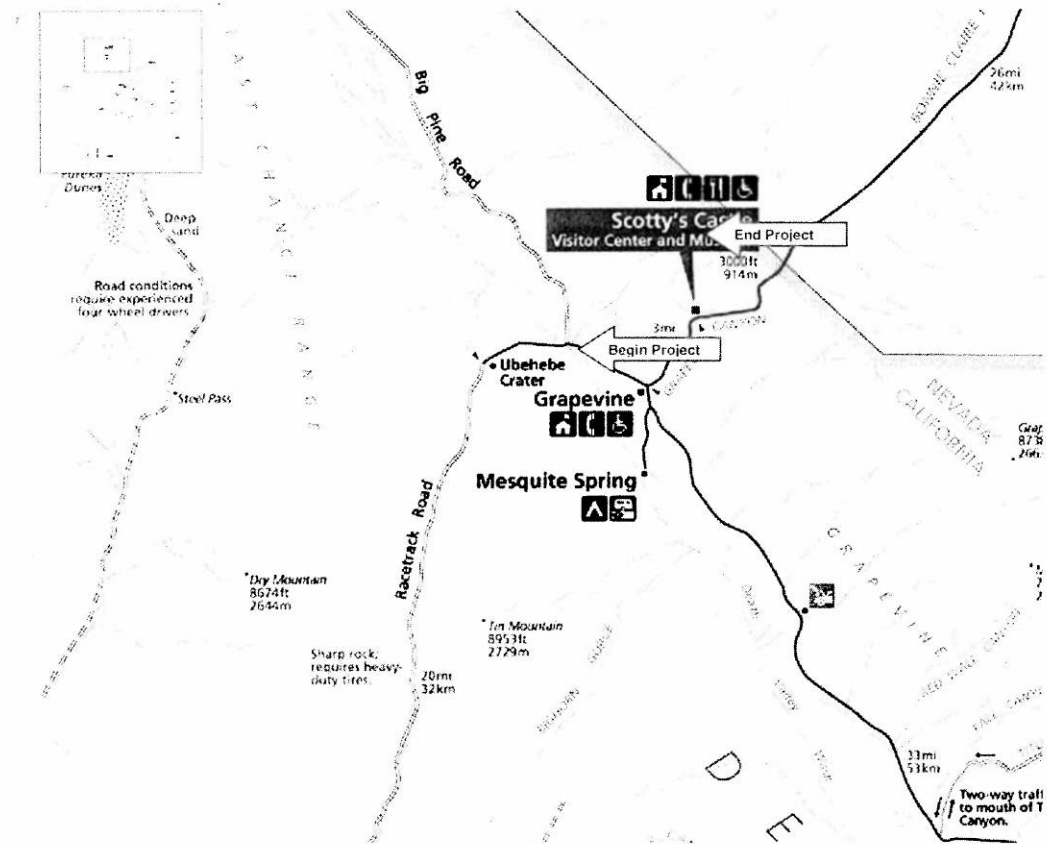


Sarah Craighead  
Superintendent

Enclosure (project map)



Bonnie Clare Road Project Map





## **APPENDIX C: SPECIES LIST**

## APPENDIX C: SPECIES LIST

## **Appendix C**

### **Species Lists for Biological Resources of the Bonnie Clare Road and Scotty's Castle Sites**

**Table C-1: Number of Small Mammal Species Captured by Habitat within the Bonnie Clare Road Corridor (Source: Lalumiere et al. 2005)**

**Table C-2. Avian Species Observed in Habitats Adjacent to Bonnie Clare Road. (Sources: Halterman 2005; Johnson and Saulino 2005; Heindel and Heindel 2002)**

**Table C-3. Herpetile Species Observed<sup>a</sup> and Potentially Occurring<sup>b</sup> in Habitats along the Bonnie Clare Road, Spring and Summer 2005. (Source: Johnson and Saulino 2005)**

**Table C-4. List of Butterfly, Dragonfly, and Damselfly Species Observed Along Bonnie Clare Road and in the Scotty's Castle Vicinity, Spring and Summer 2005. (Source: Johnson and Saulino 2005)**

**Table C-5. Macroinvertebrate and Aquatic Survey at Three Scotty's Castle Sites within DEVA (Source: HDR/e<sup>2</sup>M 2010)**

## APPENDIX C: SPECIES LIST

**Table C-1: Number of Small Mammal Species Captured by Habitat within the Bonnie Clare Road Corridor (Source: Lamuliere et al. 2005)**

Common Name / Scientific Name	Wetland/ Riparian	Desert Wash Scrub	Mesquite
White-tailed antelope squirrel / <i>Ammospermophilus leucurus</i>	1	9	4
California pocket mouse / <i>Chaetodipus californicus</i>	0	13	0
San Diego pocket mouse / <i>Chaetodipus fallax</i>	0	1	0
Desert pocket mouse / <i>Chaetodipus penicillatus</i>	3	194	42
Pocket mouse / <i>Chaetodipus</i> spp.	0	3	0
Desert kangaroo rat / <i>Dipodomys deserti</i>	0	3	0
Merriam's kangaroo rat / <i>Dipodomys merriami</i>	7	68	5
Kangaroo rat / <i>Dipodomys</i> spp.	0	2	0
House mouse / <i>Mus musculus</i>	0	1	3
White-throated woodrat / <i>Neotoma albigula</i>	0	1	2
Desert woodrat / <i>Neotoma lepida</i>	1	1	2
Brush mouse / <i>Peromyscus boylii</i>	13	2	3
Canyon mouse / <i>Peromyscus crinitus</i>	13	77	4
Cactus mouse / <i>Peromyscus eremicus</i>	125	30	35
Deer mouse / <i>Peromyscus maniculatus</i>	5	2	6
Pocket mouse / <i>Peromyscus</i> spp.	11	4	1
Western harvest mouse / <i>Reithrodontomys megalotis</i>	7	0	4



**Table C-2. Avian Species Observed in Habitats Adjacent to Bonnie Clare Road.  
(Sources: Halterman 2005; Johnson and Saulino 2005; Heindel and Heindel 2002)**

Common Name	Scientific Name
Accipiter (unknown species)	Accipiter sp.
American goldfinch <sup>m</sup>	Carduelis tristis
American robin <sup>b,m</sup>	Turdus migratorius
Anna's hummingbird <sup>m</sup>	Calypte anna
Ash-throated flycatcher <sup>b</sup>	Myiarchus cinerascens
Barn swallow	Hirundo rustica
Bewick's wren <sup>b,m</sup>	Thryomanes bewickii
Blackbird (unknown species)	Unknown
Black-headed grosbeak <sup>m</sup>	Pheucticus melanocephalus
Black phoebe <sup>b</sup>	Sayornis nigricans
Black-throated sparrow <sup>b,m</sup>	Amphispiza bilineata
Blue-grey gnatcatcher <sup>b</sup>	Polioptila caerulea
Blue grosbeak <sup>b,m</sup>	Guiraca caerulea
Brewer's sparrow <sup>m</sup>	Spizella breweri
Broad-tailed hummingbird <sup>m</sup>	Selasphorus platycercus
Brown-headed cowbird <sup>b,m</sup>	Molothrus ater
Bullock's oriole <sup>b,m</sup>	Icterus bullockii
Bushtit <sup>b</sup> (unknown species)	Psaltiriparus sp.
Calliope hummingbird <sup>m</sup>	Stellula calliope
Cassin's vireo <sup>m</sup>	Vireo cassinii
Cedar waxwing <sup>m</sup>	Bombycilla cedrorum
Chipping sparrow <sup>m</sup>	Spizella passerina
Chukar	Alectoris graeca
Common raven <sup>b</sup>	Corvus corax
Common snipe <sup>m</sup>	Gallinago gallinago
Common yellowthroat <sup>b,m</sup>	Goethlypis trichas
Cooper's hawk <sup>b,m</sup>	Accipiter cooperii
Costa's hummingbird <sup>b</sup>	Calypte costae
Dark-eyed junco <sup>m</sup>	Junco hyemalis
Dusky flycatcher <sup>m</sup>	Empidonax oberholseri
Flycatcher (unknown species)	Empidonax sp.
European starling <sup>b,m</sup>	Sturnus vulgaris
Great egret	Casmerodius albus
Greater roadrunner	Geococcyx californianus
Great-tailed grackle <sup>m</sup>	Cassidix mexicanus
Green heron <sup>m</sup>	Butorides virescens
Green-tailed towhee <sup>m</sup>	Pipilo chlorurus
Grey flycatcher <sup>m</sup>	Empidonax wrightii
Hammond's/Dusky flycatcher <sup>m</sup>	Empidonax hammondii
Harris' sparrow <sup>m</sup>	Zonotrichia querula
Hermit thrush <sup>m</sup>	Catharus guttatus
Hooded oriole <sup>b</sup>	Icterus cucullatus

Common Name	Scientific Name
Horned lark	<i>Eremophila alpestris</i>
House finch <sup>b</sup>	<i>Carpodacus mexicanus</i>
House sparrow <sup>b,m</sup>	<i>Passer domesticus</i>
House wren <sup>m</sup>	<i>Troglodytes aedon</i>
Killdeer	<i>Charadrius vociferus</i>
Lark sparrow <sup>m</sup>	<i>Chondestes grammacus</i>
Lazuli bunting <sup>b</sup>	<i>Passerina amoena</i>
Least flycatcher <sup>m</sup>	<i>Empidonax minimus</i>
Lesser goldfinch <sup>b</sup>	<i>Spinus psaltria</i>
Lincoln's sparrow <sup>m</sup>	<i>Melospiza lincolnii</i>
Loggerhead shrike <sup>b,m</sup>	<i>Lanius ludovicianus</i>
Long-eared owl	<i>Asio otus</i>
Lucy's warbler <sup>m</sup>	<i>Vermivora luciae</i>
MacGillivray's warbler <sup>m</sup>	<i>Oporornis tolmiei</i>
Marsh wren <sup>m</sup>	<i>Cistothorus palustris</i>
Mourning dove <sup>b</sup>	<i>Zenaidura macroura</i>
Nashville warbler <sup>m</sup>	<i>Vermivora ruficapilla</i>
Northern flicker <sup>m</sup>	<i>Colaptes auratus</i>
Northern mockingbird <sup>b,m</sup>	<i>Mimus polyglottos</i>
Northern parula <sup>m</sup>	<i>Parula americana</i>
Northern rough-winged swallow <sup>m</sup>	<i>Stelgidopteryx serripennis</i>
Olive-sided flycatcher <sup>m</sup>	<i>Nuttallornis borealis</i>
Orange-crowned warbler <sup>m</sup>	<i>Vermivora celata</i>
Pacific-slope flycatcher	<i>Empidonax difficilis</i>
Phainopepla <sup>b,m</sup>	<i>Phainopepla nitens</i>
Pine siskin <sup>m</sup>	<i>Spinus pinus</i>
Plumbeous vireo <sup>m</sup>	<i>Vireo plumbeus</i>
Purple finch <sup>m</sup>	<i>Carpodacus purpureus</i>
Red-tailed hawk <sup>m</sup>	<i>Buteo jamaicensis</i>
Red-winged blackbird <sup>m</sup>	<i>Agelaius phoeniceus</i>
Rock wren <sup>b,m</sup>	<i>Salpinctes obsoletus</i>
Ruby-crowned kinglet <sup>m</sup>	<i>Regulus calendula</i>
Rufous hummingbird <sup>m</sup>	<i>Selasphorus rufus</i>
Sage thrasher <sup>m</sup>	<i>Oreoscoptes montanus</i>
Say's phoebe <sup>b,m</sup>	<i>Sayornis saya</i>
Scott's oriole <sup>m</sup>	<i>Icterus parisorum</i>
Scrub jay <sup>m</sup>	<i>Aphelocoma coerulescens</i>
Sharp-shinned hawk <sup>m</sup>	<i>Accipiter striatus</i>
Snowy egret	<i>Leucophoyx thula</i>
Solitary vireo <sup>m</sup>	<i>Vireo solitarius</i>
Song sparrow <sup>m</sup>	<i>Melospiza melodia</i>
Townsend's warbler <sup>m</sup>	<i>Dendroica townsendi</i>
Tree swallow <sup>m</sup>	<i>Iridoprocne bicolor</i>
Turkey vulture	<i>Cathartes aura</i>
Verdin <sup>b</sup>	<i>Auriparus flaviceps</i>

## APPENDIX C: SPECIES LIST

Common Name	Scientific Name
Violet-green swallow <sup>m</sup>	<i>Tachycineta thalassina</i>
Warbler (unknown species)	Unknown
Warbling vireo <sup>m</sup>	<i>Vireo gilvus</i>
Western kingbird <sup>b,m</sup>	<i>Tyrannus verticalis</i>
Western scrub jay <sup>m</sup>	<i>Aphelocoma californica</i>
Western tanager <sup>m</sup>	<i>Piranga ludoviciana</i>
Western wood-pewee <sup>b,m</sup>	<i>Contopus sordidulus</i>
White-crowned Gambel's sparrow <sup>m</sup>	<i>Zonotrichia leucophrys gambelii</i>
White-crowned mountain sparrow <sup>m</sup>	<i>Zonotrichia leucophrys</i>
White-crowned sparrow	<i>Zonotrichia leucophrys</i>
White-throated swift <sup>b,m</sup>	<i>Aeronautes saxatalis</i>
Willow flycatcher <sup>m</sup>	<i>Empidonax traillii</i>
Wilson's snipe <sup>m</sup>	<i>Gallinago delicata</i>
Wilson's warbler <sup>m</sup>	<i>Wilsonia pusilla</i>
Yellow-breasted chat <sup>b</sup>	<i>Icteria virens</i>
Yellow-rumped warbler (Audubon's) <sup>m</sup>	<i>Dendroica coronata</i>
Yellow warbler <sup>b</sup>	<i>Dendroica petechia</i>

b = species breeds onsite; m = species is a migrant

**Table C-3. Herpetile Species Observed<sup>a</sup> and Potentially Occurring<sup>b</sup> in Habitats Along Bonnie Clare Road, Spring and Summer 2005  
(Source: Johnson and Saulino 2005)**

Common Name	Scientific Name	Bonnie Clare
Western banded gecko <sup>a</sup>	<i>Coleonyx variegatus</i>	X
Panamint alligator lizard <sup>b</sup>	<i>Elgaria panamintina</i>	
Gilbert skink <sup>b</sup>	<i>Eumeces gilberti</i>	
Western whiptail <sup>a</sup>	<i>Cnemidophorus tigris</i>	X
Desert night lizard <sup>b</sup>	<i>Xantusia vigilis</i>	
Desert iguana <sup>a</sup>	<i>Dipsosaurus dorsalis</i>	X
Long-nosed leopard lizard <sup>b</sup>	<i>Gambelia wislizenii</i>	
Great Basin collared lizard <sup>a</sup>	<i>Crotaphytus bicinctores</i>	X
Chuckwalla <sup>a</sup>	<i>Sauromalus obesus</i>	X
Zebra-tailed lizard <sup>a</sup>	<i>Callisaurus draconoides</i>	X
Desert spiny lizard <sup>a</sup>	<i>Sceloporus magister</i>	X
Western fence lizard <sup>b</sup>	<i>Sceloporus occidentalis</i>	
Side-blotched lizard <sup>a</sup>	<i>Uta stansburiana</i>	X
Desert horned lizard <sup>a</sup>	<i>Phrynosoma platyrhinos</i>	X
Coachwhip <sup>b</sup>	<i>Masticophis flagellum</i>	
Striped whipsnake <sup>b</sup>	<i>Masticophis taeniatus</i>	
Western patch-nosed snake <sup>b</sup>	<i>Salvadora hexalepis</i>	
Spotted leaf-nosed snake <sup>b</sup>	<i>Phyllorhynchus decurtatus</i>	
Glossy snake <sup>b</sup>	<i>Arizona elegans</i>	
Gopher snake <sup>a</sup>	<i>Pituophis catenifer</i>	X
Common kingsnake <sup>a</sup>	<i>Lampropeltis getulus</i>	X
Long-nosed snake <sup>b</sup>	<i>Rhinocheilus lecontei</i>	
Ground snake <sup>b</sup>	<i>Sonora semiannulata</i>	
Western shovel-nosed snake <sup>b</sup>	<i>Chionactis occipitalis</i>	
Lyre snake <sup>b</sup>	<i>Trimorphodon biscutatus</i>	
Night snake <sup>a</sup>	<i>Hypsiglena torquata</i>	X
Southwestern black-headed snake <sup>b</sup>	<i>Tantilla hobartsmithi</i>	
Speckled rattlesnake <sup>a</sup>	<i>Crotaphytus mitchelli</i>	X
Sidewinder <sup>a</sup>	<i>Crotaphytus cerastes</i>	X
Desert tortoise <sup>b</sup>	<i>Gopherus agassizii</i>	
Pacific tree frog <sup>a</sup>	<i>Hyla regilla</i>	X

**Table C-4. List of Butterfly, Dragonfly, and Damselfly Species Observed Along Bonnie Clare Road and in the Scotty's Castle Vicinity, Spring and Summer 2005**  
(Source: Johnson and Saulino 2005)

Butterfly Species	Dragonfly and Damselfly Species
Becker's white ( <i>Pontia beckeri</i> )	vivid dancer ( <i>Argia vivida</i> )
orange sulphur ( <i>Colias eurytheme</i> )	Aztec dancer ( <i>Argia nahuana</i> )
sleepy orange ( <i>Eurema nicippe</i> )	blue-ringed dancer ( <i>Argia sedula</i> )
Acmon blue ( <i>Plebejus acmon</i> )	familiar bluet ( <i>Enallagma civile</i> )
Reakirt's blue ( <i>Hemiargus isola</i> )	alkali bluet ( <i>Enallagma clausum</i> )
marine blue ( <i>Leptotes marina</i> )	tule bluet ( <i>Enallagma carunculatum</i> )
western pygmy blue ( <i>Brephidium exile</i> )	arroyo bluet ( <i>Enallagma praevarum</i> )
gray hairstreak ( <i>Strymon melinus</i> )	black-fronted forktail ( <i>Ischnura denticollis</i> )
painted lady ( <i>Vanessa cardui</i> )	desert forktail ( <i>Ischnura barberi</i> )
queen ( <i>Danaus gilippus</i> )	desert firetail ( <i>Telebasis salva</i> )
Yuma skipper ( <i>Ochiodes yuma</i> )	flame skimmer ( <i>Libellula saturata</i> )
common checkered or white skipper ( <i>Pyrgus communis</i> or <i>P. albescens</i> )	Comanche skimmer ( <i>Libellula comanche</i> )
sootywing ( <i>Pholisora</i> sp.)	bleached skimmer ( <i>Libellula composita</i> )
fiery skipper ( <i>Hylephila phyleus</i> )	hoary skimmer ( <i>Libellula nodistica</i> )
---	variegated meadowhawk ( <i>Sympetrum corruptum</i> )
---	blue dasher ( <i>Pachydiplax longipennis</i> )
---	western pondhawk ( <i>Erythemis collocata</i> )
---	spot-winged glider ( <i>Pantala hymenaea</i> )
---	giant darner ( <i>Anax walsinghami</i> )
---	white-belted ringtail ( <i>Erpetogomphus compositus</i> )

**Table C-5. Macrobenthic Invertebrate and Aquatic Survey at Three Scotty's Castle Sites within DEVA (Source: HDR/e<sup>2</sup>M 2010)**

Order	Suborder/Family/SubFamily/Genus/Species	Seep	Pump House (Spring)	Proper (Stream)
Amphipoda	Gammaridae: <i>Gammarus</i> sp.	4	--	--
	Hyalellidae: <i>Hyalella azteca</i>	--	148	--
	Hyalellidae: <i>Hyalella</i> sp.	--	--	15
Diptera	Chironomidae: ---	--	--	8
	Simuliidae: <i>Greniera</i> sp.	--	--	6
	Stratiomyidae: <i>Myxosarsus</i> sp.	11	--	--
	Stratiomyidae: <i>Stratiomys</i> sp.	96	--	--
Odonata	Coenagrionadae: <i>Argia</i> sp.	--	--	11
Trichoptera	Polycentropdidae: ---	--	--	1
	Hydropsychidae: <i>Hydropsyche</i> sp.	--	--	312
Trombidiformes	Hydrachnidae: <i>Hydrachna</i> sp.	1	--	--
Gastropoda	Basommatophora: Physidae: ---	(4 empty)	--	38
	Hypsogastropoda: Hydrobiidae: ---	--	615	--
Oligochaeta	---	--	--	1
Turbellaria	---	--	--	4
Total Individuals	Combined Samples	112	763	396

## APPENDIX C: SPECIES LIST

## **APPENDIX D: AREA OF POTENTIAL EFFECT FOR CULTURAL RESOURCES**





## **AREA OF POTENTIAL EFFECT FOR CULTURAL RESOURCES**

Section 106 and 36 CFR 800.4(a)1 requires that a federal agency, once it has determined a project has the potential to affect historic properties, must establish the area of potential effect (APE) for a proposed undertaking and then identify if there are any historic properties within the APE(s) listed in or eligible for listing in the National Register of Historic Places (national register).

The APE for direct effects of the proposed undertaking includes any area where there may be ground disturbing, demolition, or construction activities. This would include all areas within the temporary and permanent right-of-way required for the project and all areas within the “clearing limits” as indicated on the road plans. Some of the riprap areas along Bonnie Clare Road indicated on the road plans extend outside the “clearing limits.” At MP 5.8, the riprap extends approximately 26 feet to the north of the clearing limits, but the average extent to which the riprap extends outside the clearing limits is approximately 12 feet. These riprap areas are within the direct effect APE for the project. The location where the historic fence would be moved along the road (outside of the 7 feet “clear recovery zone”) is also within the direct effect APE for the project.

The APE for indirect effects for the preferred alternative includes areas that would not be impacted directly by construction related activities but may be visually or audibly impacted or that may be impacted by an off-site construction related activity (e.g., construction of wetland mitigation area or borrow areas). Indirect effects can be temporary (e.g., construction-related noise) or permanent (e.g., changing the viewshed). For this project, if any portion of a national register eligible or listed historic property is within the APE, then the entire historic property is included in the APE.

## **AREA OF POTENTIAL EFFECT FOR RECONSTRUCTION OF BONNIE CLARE ROAD**

The proposed project would widen the asphalt along some sections of the road and realign other sections. The APE for direct effects along Bonnie Clare Road includes the existing road prism and all areas within the clearing limits as displayed on the Federal Highway Administration plans as well as the footprint for the riprap areas that extend beyond the clearing limits established by the plans. The direct effect APE also includes the location where the historic fence along the road at DVSHD would be relocated. Because the project involves a road that lies on the ground surface and fence posts that extend no more than 11 feet above ground surface, the visual APE for the proposed project is a relatively small corridor along Bonnie Clare Road and is generally defined as an approximate 50 feet (15 meters) buffer from the center line of the proposed realignment of the road. There is one national register listed and two eligible properties adjacent to or bisected by Bonnie Clare Road (figure D-1). As a result, the APE for indirect effects includes the boundaries of the historic properties (figure D-2), each of which is described below.

Bonnie Clare Road, the subject of the proposed undertaking, has been determined a national register eligible historic property associated with the early Mission 66 National Park Service capital development program (NPS 2011b). The historic property boundary for the road was determined to be the road and a 50-foot buffer from the centerline from MP 0.0 at the Nevada/California boundary to MP 7.5 at the intersection with Ubehebe Crater Road. The road and its character-defining features are within the direct APE for the project. The character-defining features of the Bonnie Clare Road Historic Property were identified in a draft cultural landscape inventory in 2011 (NPS 2011b) and provided to the California SHPO with a request for concurrence with the road’s eligibility for listing on the national register on July 1, 2011.

## APPENDIX D: AREA OF POTENTIAL EFFECT FOR CULTURAL RESOURCES

The DVSHD / Scotty's Castle is between MPs 3.5 and 6.0 on the north and west sides of Bonnie Clare Road. The DVSHD was listed on the national register in 1978. The entire district includes approximately 1,500 acres, the majority of which is in the Lower Vine Ranch portion of the district to the northwest outside of Grapevine Canyon. Additional information regarding DVSHD is found in section 4 of this report. The portion of the historic district along Bonnie Clare Road contains four contributing features within or adjacent to the project area's APE for direct effects: the historic fence line along the 2.6-mile section of road as it passes the district, Indian Camp archeological site, the historic entrance to the district, and Cottonwood Corner. The APE for indirect effects includes the entire DVSHD.

The park has recently determined that the Grapevine Canyon Archaeological District (GVCAD) is eligible for listing in the national register. The district contains 46 contributing archeological sites and 17 contributing archeological isolates. The boundary for the district is determined to encompass the entire length of Grapevine Canyon, including all the sites and isolates as well as the ethnographically significant natural features like the springs and canyon walls. Currently, Bonnie Clare Road bisects the entire length of the GVCAD and bisects a contributing archeological site. The APE for direct effects includes several locations where contributing resources within the district are adjacent to or within the proposed project area. Because the park has identified an archeological district, the APE for indirect effects encompasses the entire GVCAD.

Although it is anticipated that there would be temporary turn-around and staging areas near MP 1.4 and MP 5.9, the final locations of these and other construction support areas along Bonnie Clare Road would be determined at meetings among the construction contractors, Death Valley National Park (park) archeologists and other appropriate staff prior to the initiation of construction activities. These coordinated efforts would result in avoidance of recorded cultural resources. If the "mixing table" (south of Grapevine Ranger Station) is used to store building materials or stage equipment, coordination between park staff and construction contractors would be required to avoid site CA-INY-3106 located near the access to the mixing table.

As part of the project, the contractor may need to secure fill material. If so, the contractor would be required to ensure borrow sources meet all of the requirements identified in the construction contract, including that the sources be compliant with all environmental and cultural resource laws, be weed-free, and be approved by the National Park Service. The contractor would be required to provide the Federal Highway Administration with a report in accordance with the *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation*, determining if prehistoric or historic buildings, structures, sites, objects, or districts listed or eligible for listing in the national register are present and if they would be affected by the proposed activity. The Federal Highway Administration would coordinate with the SHPO and other parties to complete the section 106 process for all noncommercial areas including, but are not limited to, material sources, disposal sites, waste areas, haul roads, and staging areas.

Figures D-3 through D-7 are maps displaying the APE for direct and indirect effects for the proposed project along Bonnie Clare Road in relationship to the NRHP listed and eligible properties.

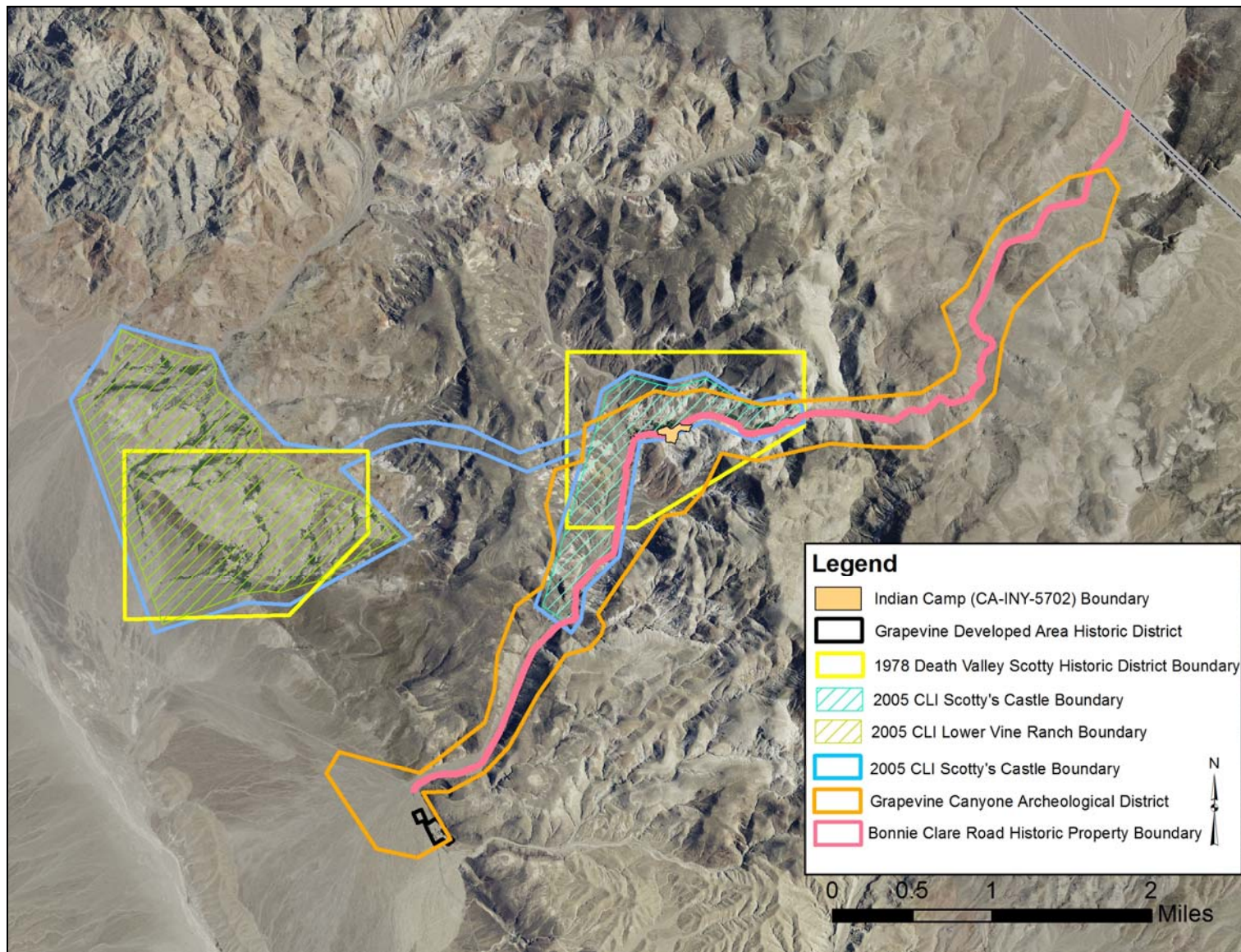


Figure D-1: Boundaries of all Historic Properties Located Along Bonnie Clare Road



APPENDIX D: AREA OF POTENTIAL EFFECT FOR CULTURAL RESOURCES

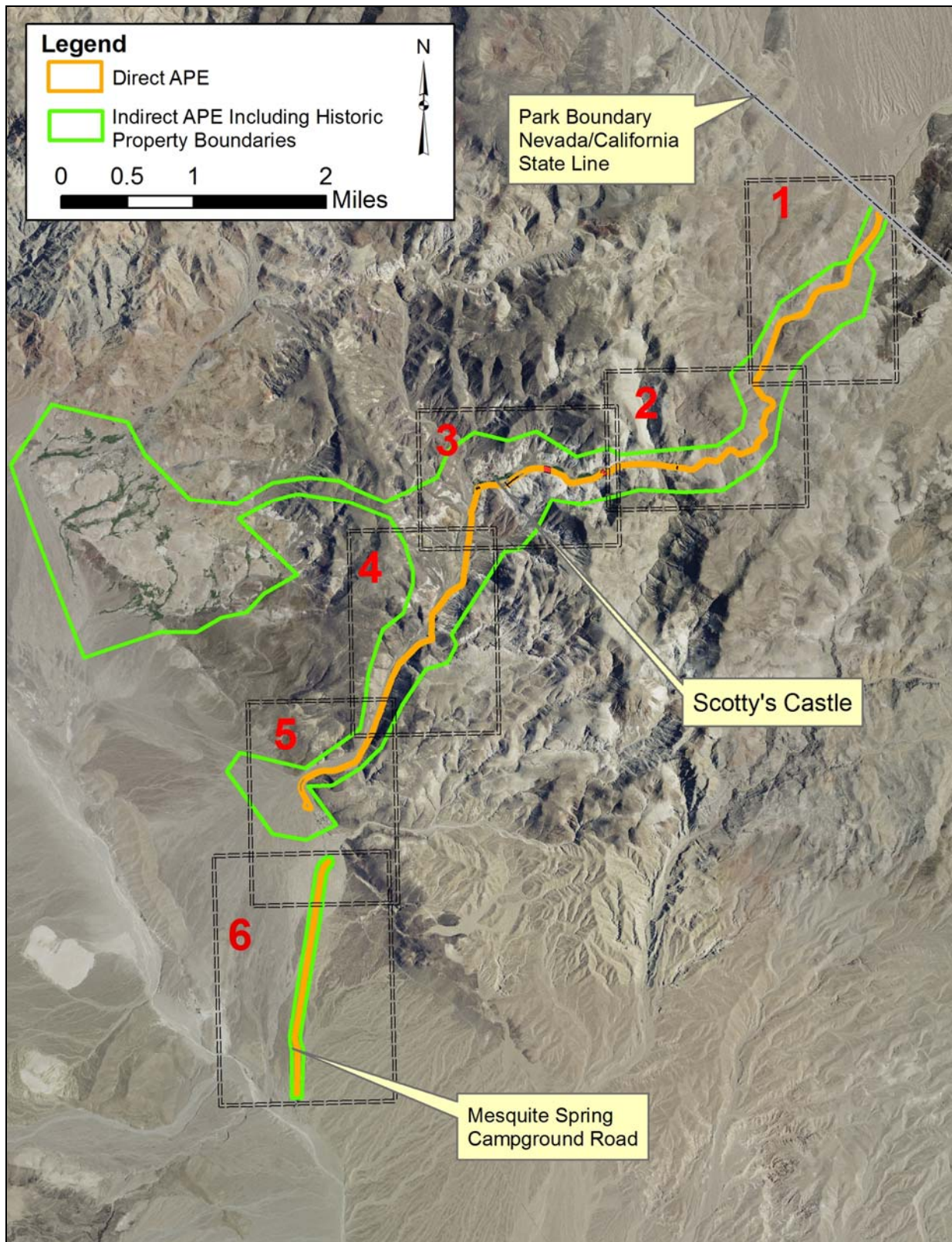


Figure D-2: Area of Potential Effects with Legend for Maps 1 through 6



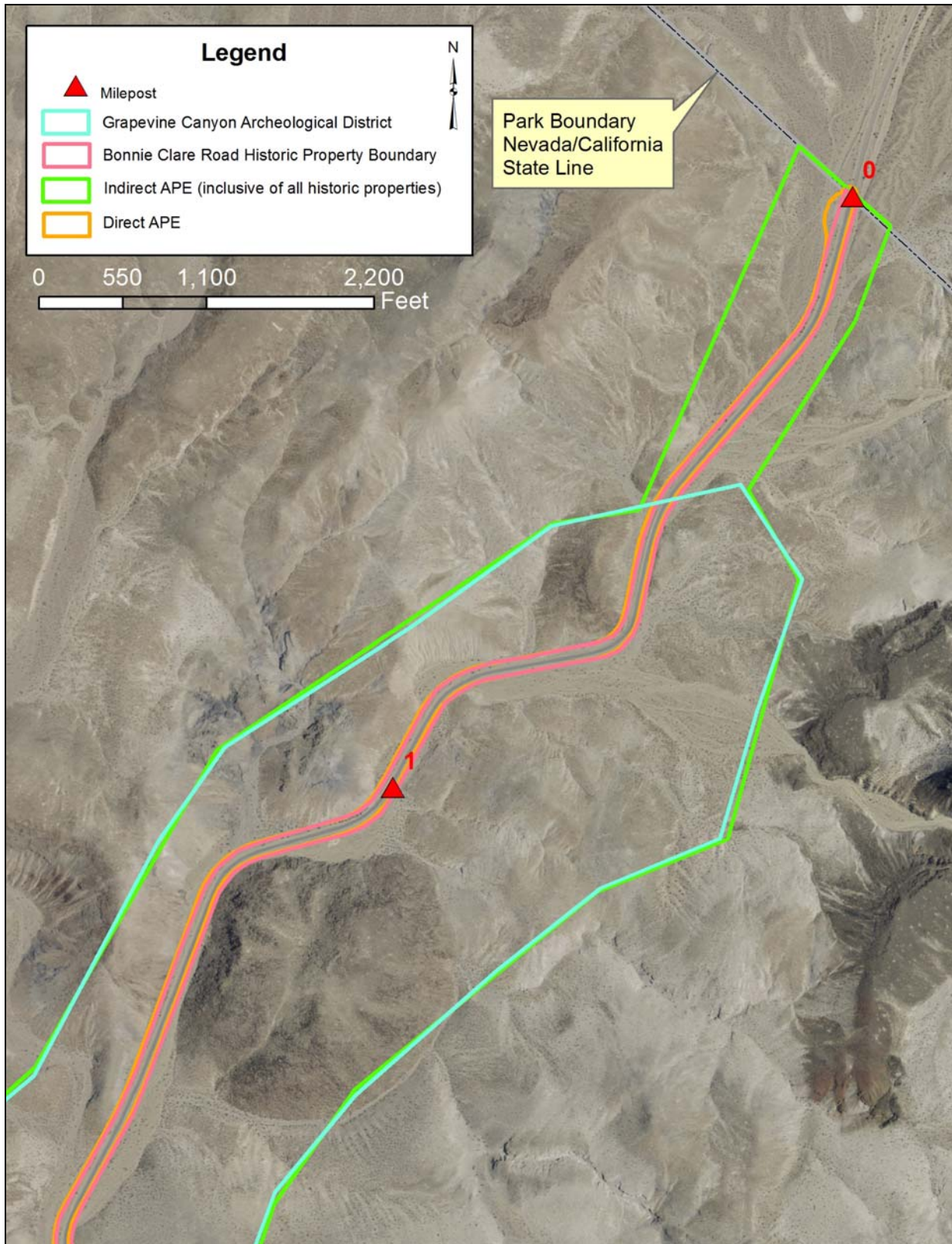


Figure D-3: Area of Potential Effects for Bonnie Clare Road Map 1  
(direct APE and Bonnie Clare Historic Property Boundary are the same for much of the project)



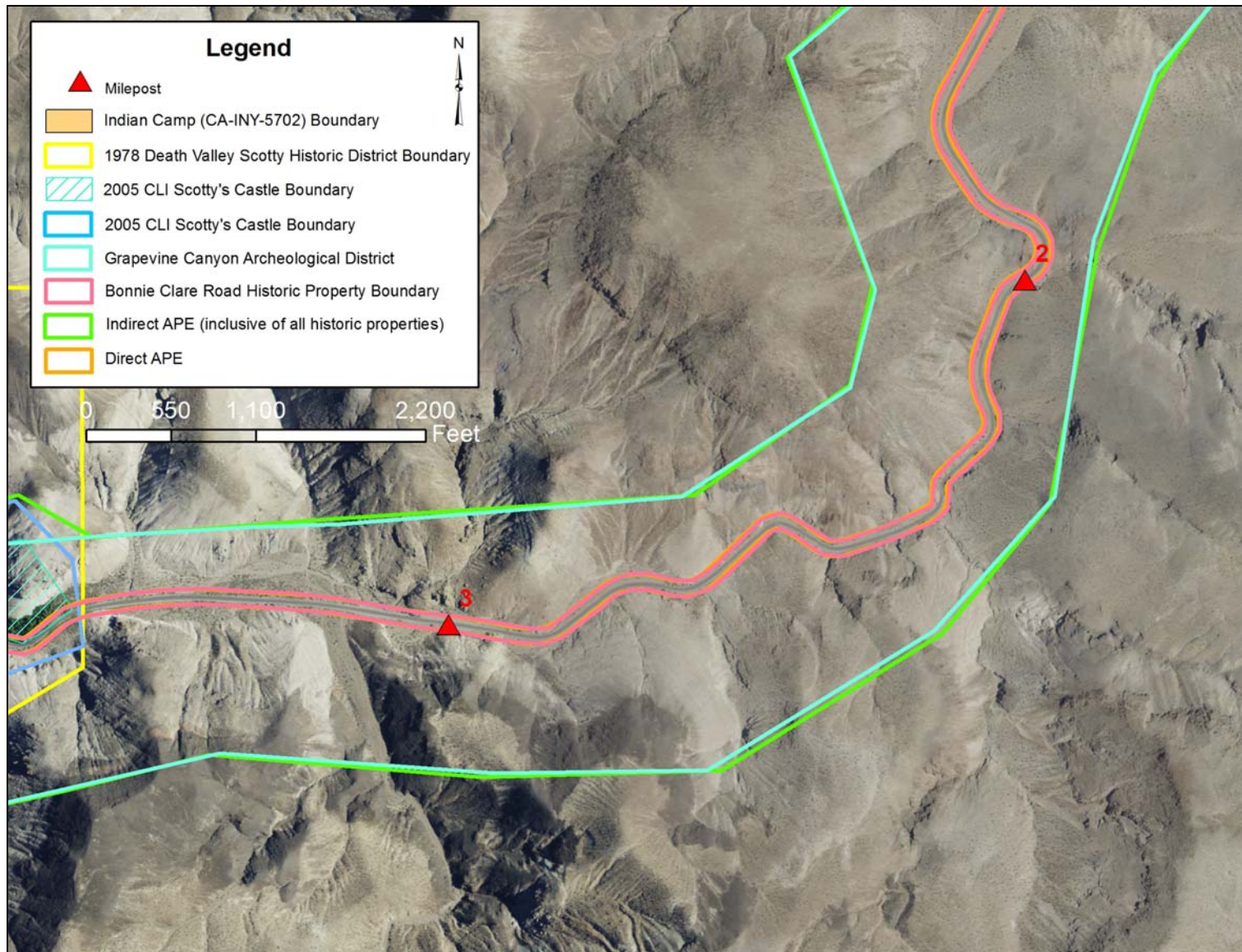


Figure D-4: Area of Potential Effects for Bonnie Clare Road Map 2  
(direct APE and Bonnie Clare Historic Property Boundary are the same for much of the project)



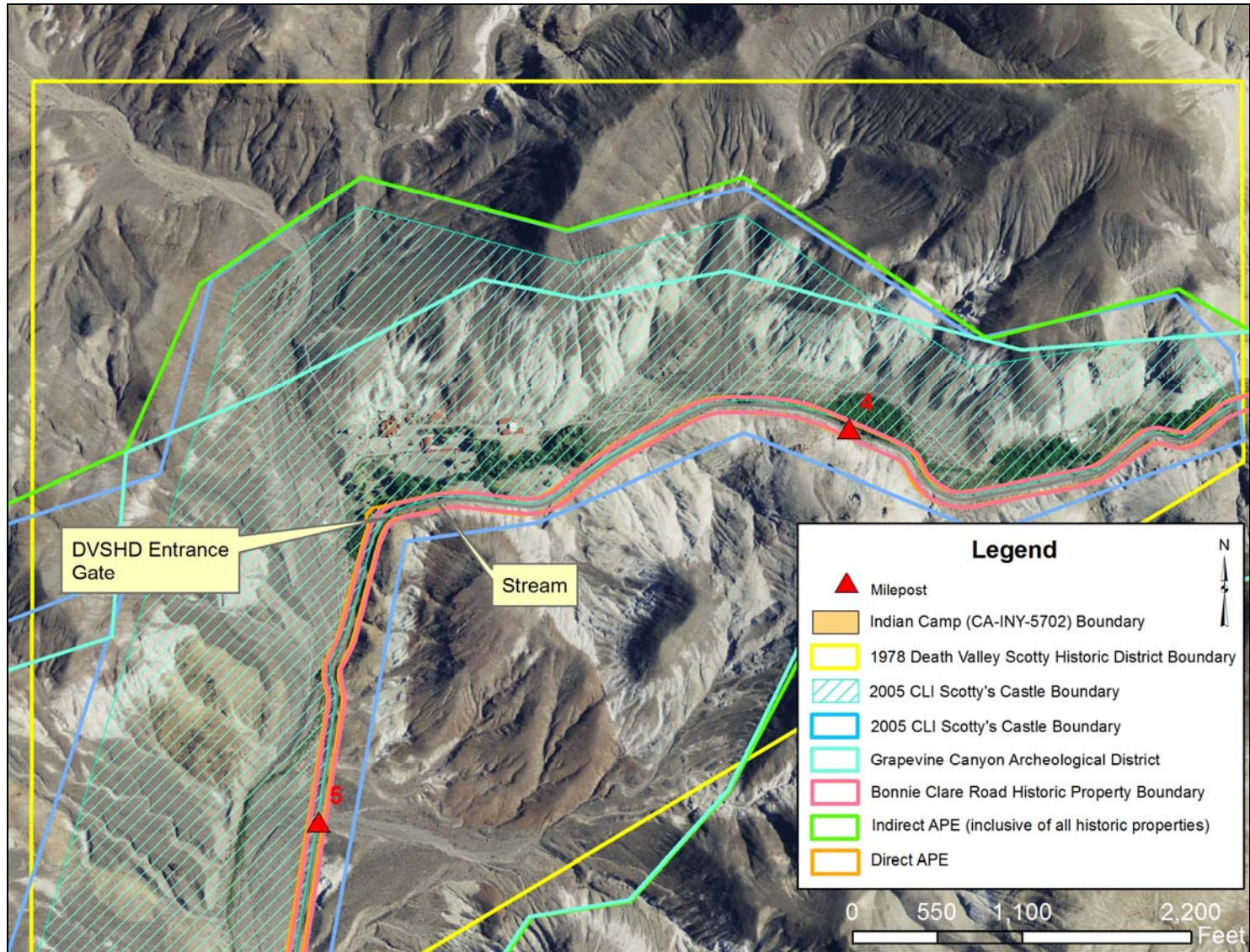


Figure D-5: Area of Potential Effects for Bonnie Clare Road Map 3 (direct APE and Bonnie Clare Historic Property Boundary are the same for much of the project)



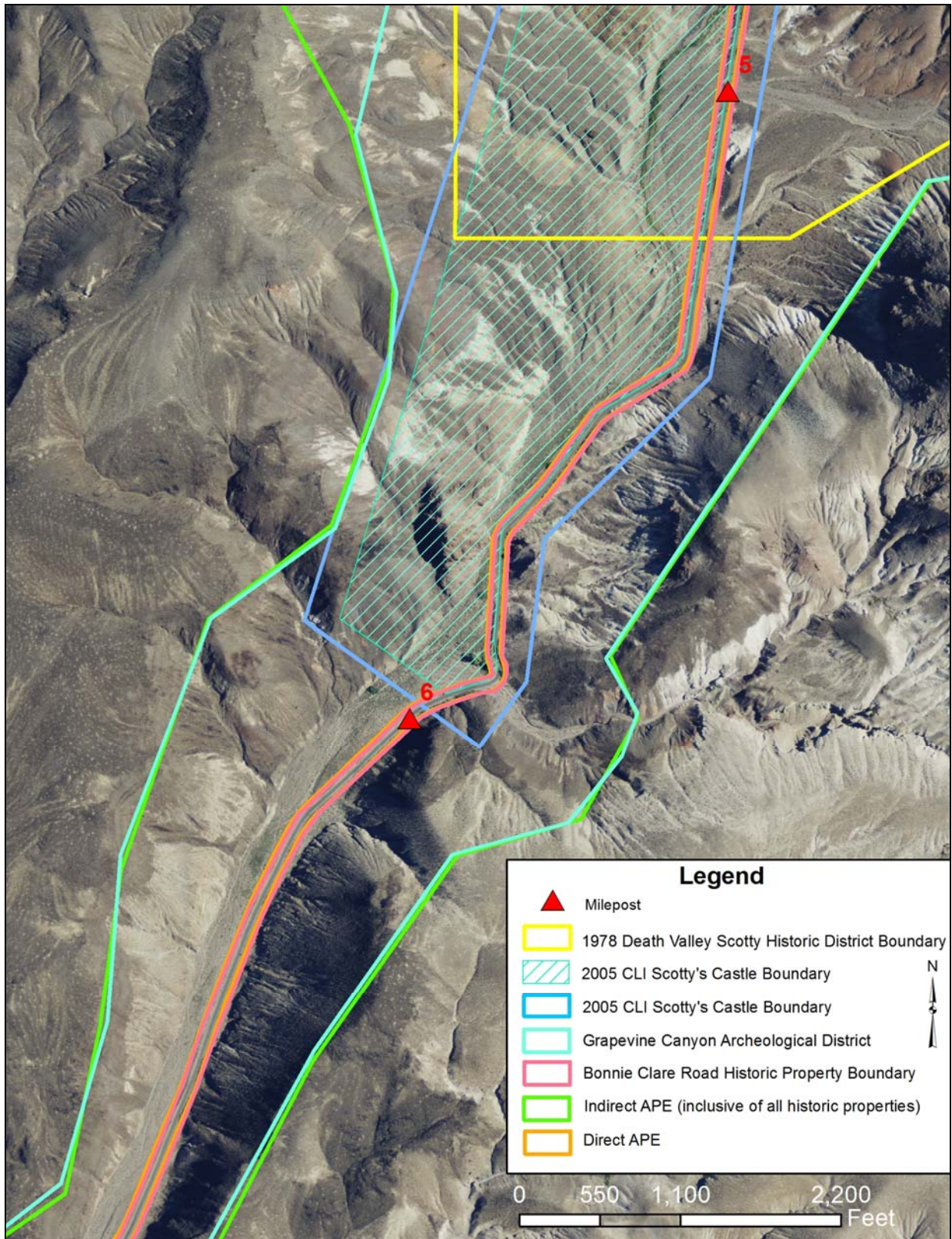


Figure D-6 Area of Potential Effects for Bonnie Clare Road Map 4 (direct APE and Bonnie Clare Historic Property Boundary are the same for much of the project)



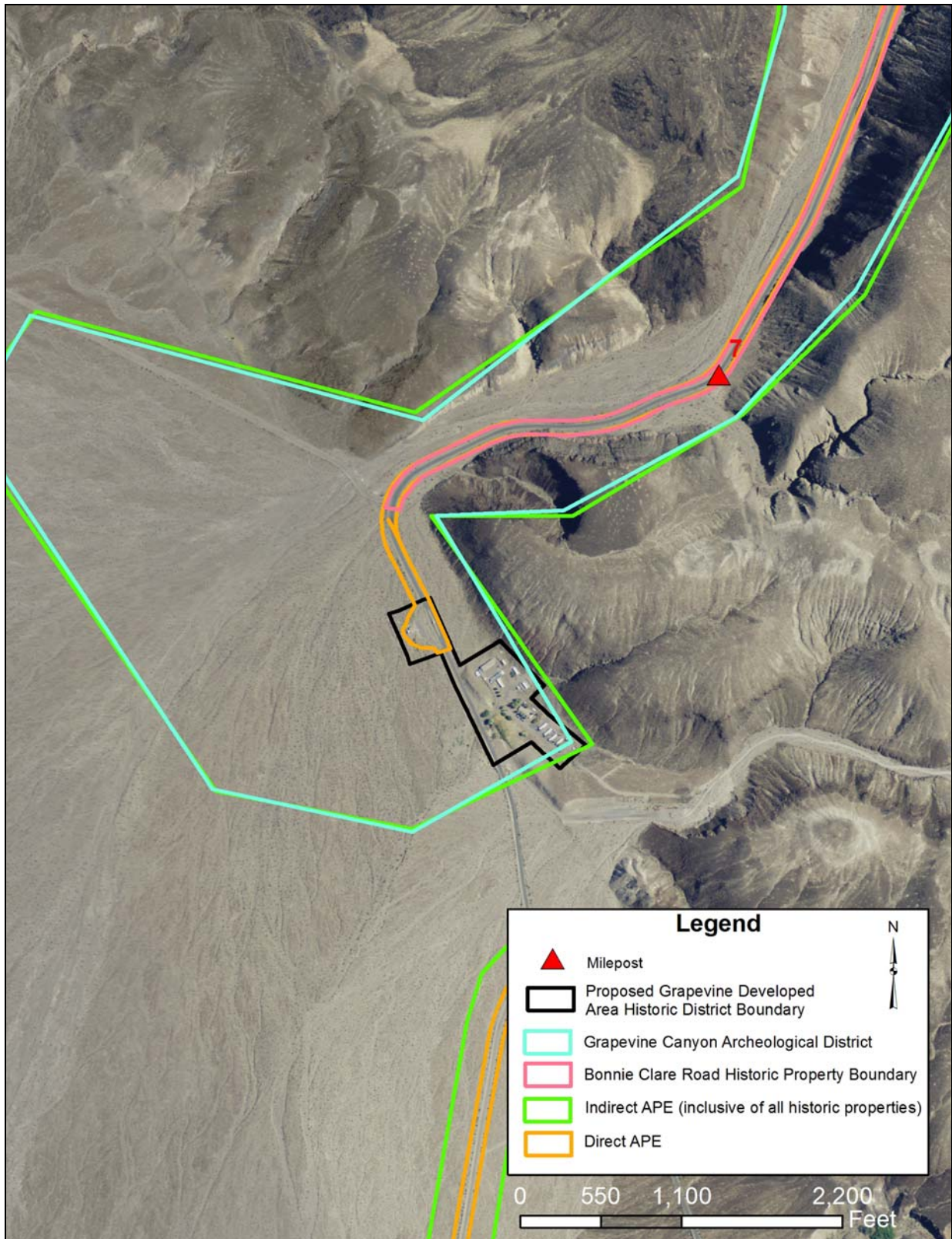


Figure D-7: Areas of Potential Effects for Bonnie Clare Road Map 5 (direct APE and Bonnie Clare Historic Property Boundary are the same for much of the project)

**AREA OF POTENTIAL EFFECT FOR RECONSTRUCTION OF  
GRAPEVINE RANGER STATION PARKING LOT AND SIDEWALK**

The Grapevine Ranger Station, fee booth and island, parking lot and island, sidewalks, curbing and guttering, and landscaping and vegetation adjacent to the sidewalks and curbs are within the APE for direct effects (figure D-8) and are contributing features to the Grapevine Developed Area Historic District. The Grapevine Developed Area Historic District has been determined eligible for listing on the national register. The other contributing features of the historic district are on the east side of the road. Although several of the features of the Grapevine Developed Area Historic District are visually obscured from the project by topography and vegetation, the APE for indirect effects encompasses the entire proposed district. Additional information regarding the Grapevine Developed Area Historic District is found in the next section of this report.



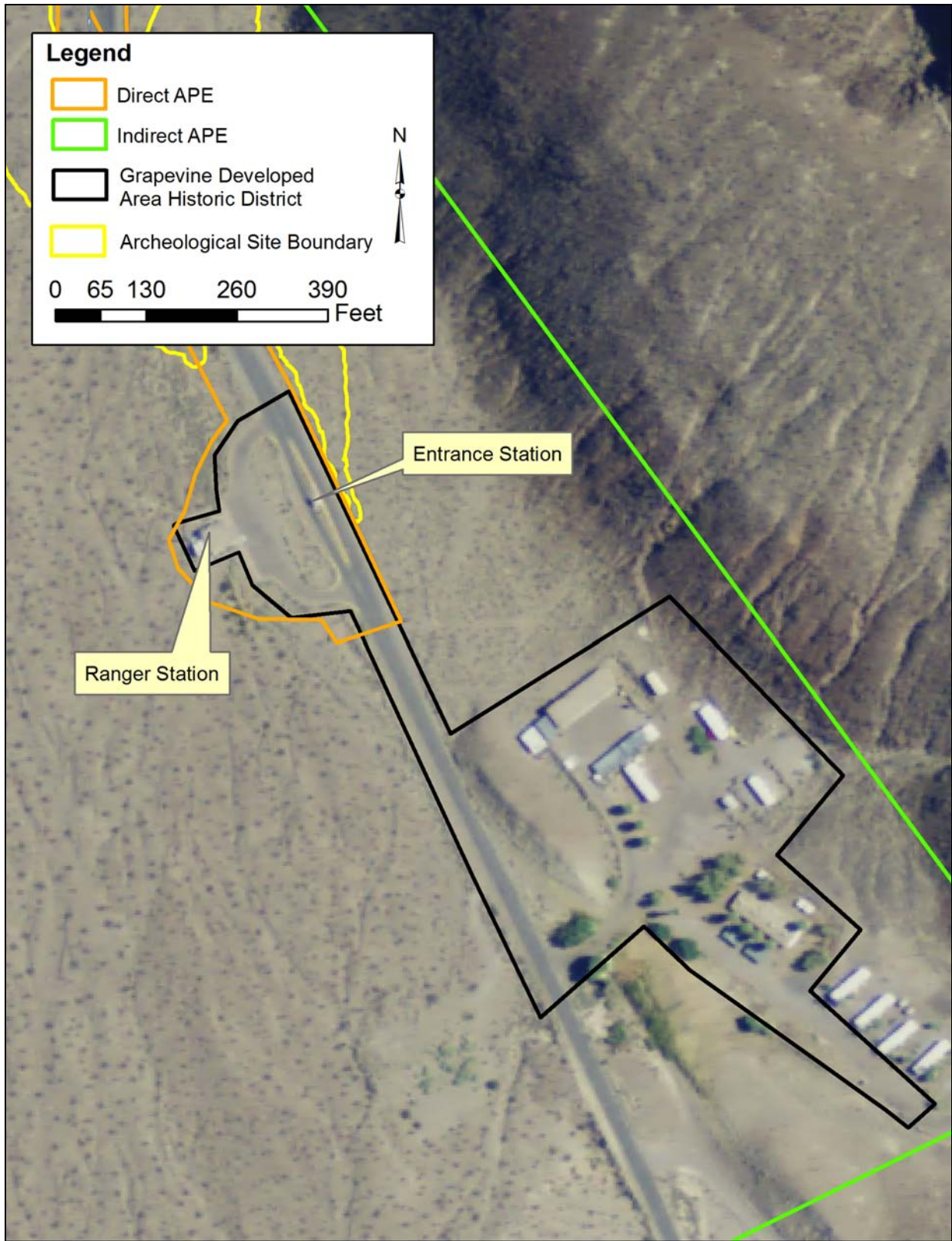


Figure D-8: Area of Potential Effect for Proposed Project at Grapevine Ranger Station Parking Lot

**AREA OF POTENTIAL EFFECT FOR RESURFACING MESQUITE SPRING CAMPGROUND ROAD**

The proposed project includes the removal of the asphalt along Mesquite Spring Campground Road and resurfacing the road extending from the intersection with Route 5 south to the first loop off of the road northeast of the campground. With the exception of the low water crossings that currently do not have final designed locations, the proposed work would remain within the existing horizontal and vertical road prism and does not extend into the campground south of the project. Therefore, the APE for direct effects includes the road prism. Because the project involves a road which lies on the ground surface, the visual or indirect APE for the proposed project is relatively small corridor along the road and is generally defined as an approximate 50 feet (15 meters) buffer from the center line of the road (figure D-9).

There are four archeological sites and four archeological isolates recorded adjacent to Mesquite Spring Campground Road. Isolates are generally not eligible for the NRHP (Bergstresser 2009) and the sites have not been evaluated for national register eligibility. Since the national register eligibility of the sites has not yet been determined, they will be treated as eligible until they have been tested (McCuistion 2011). Additional information regarding these sites and how they may be affected is found in the following sections of this report.

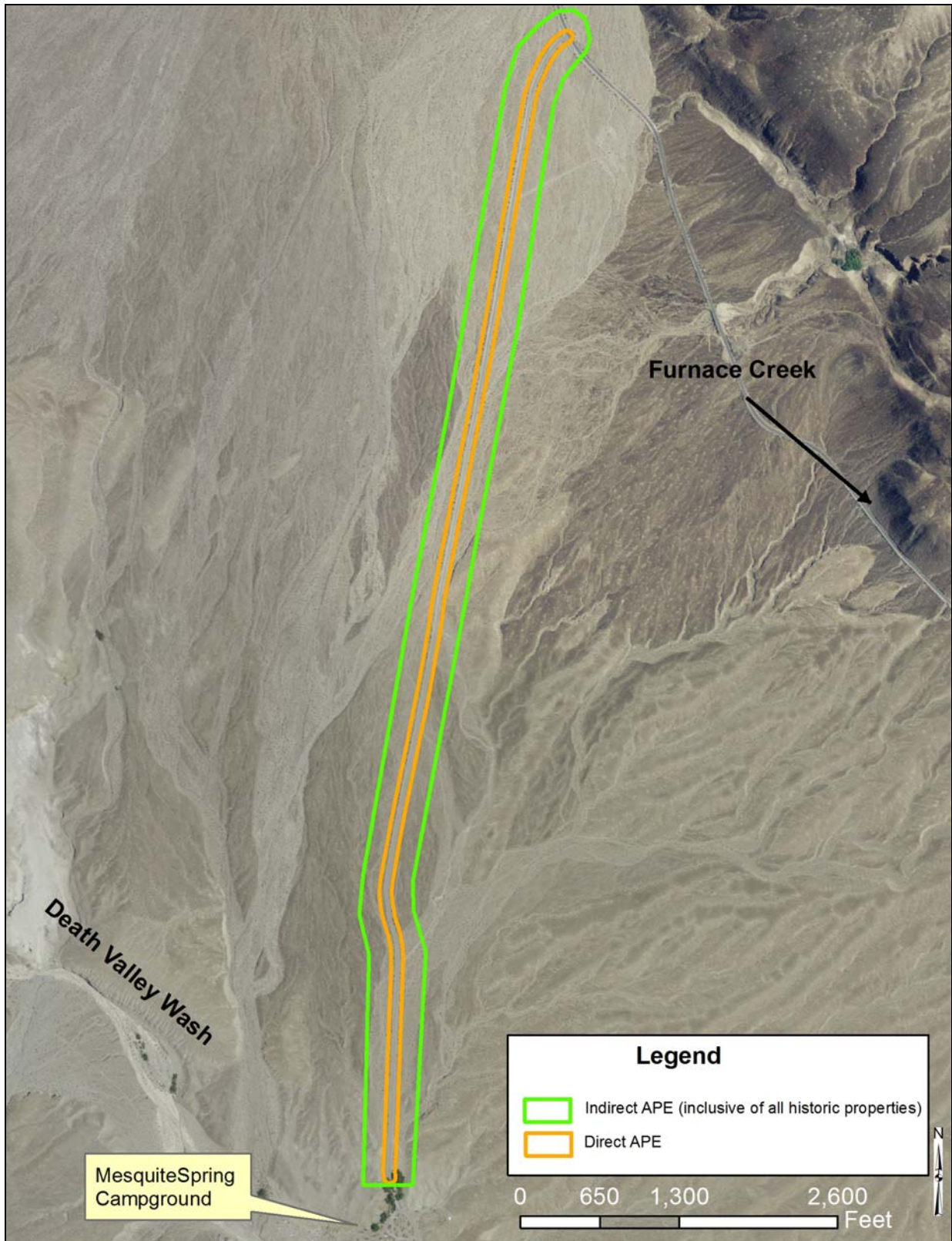


Figure D-9. Area of Potential Effect for Proposed Project on Mesquite Springs Campground Road Map 6







As the nation's principal conservation agency, the Department of the Interior has the responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historic places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. Administration.





National Park Service

United States Department of the Interior



Death Valley National Park  
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