



# United States Department of the Interior

## NATIONAL PARK SERVICE

Pacific West Region  
333 Bush Street, Suite 500  
San Francisco, CA 94104



IN REPLY REFER TO:

L7617 (PWRO-EQ)

13 SEP 2011

### Memorandum

To: Superintendent, City of Rocks National Reserve

From: Acting Regional Director, Pacific West Region

Subject: Environmental Compliance for Circle Creek Overlook Trails Project

The finalized *Finding of No Significant Impact* for constructing two trails in the Circle Creek area, as envisioned in the 1996 Comprehensive Management Plan, is approved. To complete this particular compliance effort, the park should send its notice of the decision to all individuals and organizations that received or consulted on the supporting environmental assessment.

Cynthia Ip

Attachment

cc:  
PWR-Teague

**UNITED STATES DEPARTMENT OF THE INTERIOR  
NATIONAL PARK SERVICE**

**FINDING OF NO SIGNIFICANT IMPACT**

**CIRCLE CREEK OVERLOOK TRAILS PROJECT**

**City of Rocks National Reserve  
Idaho**

The Department of the Interior, National Park Service (NPS) has prepared this Finding of No Significant Impact (FONSI) based on the environmental impact analysis contained in the Environmental Assessment (EA) for the Circle Creek Overlook Trails Project. This project would enable the City of Rocks National Reserve to construct two new trails; a geological interpretive trail and an equestrian trail. The FONSI documents the following: the decision made and basis for decision, the range of alternatives considered, public involvement and agency coordination in the conservation planning and environmental impact analysis process, determinations of significance and measures to minimize environmental harm, and findings of non-impairment.

**Purpose and Need**

The purpose of the project is to “preserve and protect” the section of the California Trail within the Reserve, the geology of the area and to “manage recreational use” of the Reserve. The construction of the Geological Interpretive Trail will assist the staff in educating visitors about the nationally significant geology of the Reserve. The Equestrian Trail will remove horse and rider from the City of Rocks Road and the Circle Creek Overlook Road thereby eliminating potential conflicts between vehicles and horses and riders.

**Selected Action**

The NPS will implement the Preferred Alternative (Alternative 2 as described in the EA); there are no modifications due to public or agency comment incorporated herein.

The Reserve would provide a 0.6 mile Geological Interpretive Trail with 13 locations, each describing a different aspect of the Reserve’s geology. The Circle Creek Overlook on the Geologic Interpretive Trail would provide an overlook of Circle Creek Basin, the primary camp for emigrants on the California Trail in the Reserve. The overlook will include one bench. The Geological Interpretive Trail will be restricted to pedestrian use only. The Smoky Mountain Connector (1.0 miles) will provide visitors the option of traveling from Smoky Mountain Campground all the way to Indian Grove and Bread Loaves on designated trail, without having to travel in conjunction with motor vehicles. The Smoky Mountain Connector will be available to pedestrians, bicycles, and equestrian riders. As on all the Reserve’s multi-use trails cyclists yield to both pedestrians and equestrians and pedestrians yield to equestrians. The trails will be

designed using the best management practices and modern techniques to minimize erosion and impacts to the environment.

Under this alternative, two trails would be constructed for a total of 1.6 miles of trail. The newly constructed Circle Creek Overlook Parking Lot will provide vehicle access to the Geological Interpretive Trail and the Circle Creek Overlook; therefore, no additional facilities will be needed. The Smoky Mountain Connector will pass by the Circle Creek Overlook Parking Lot with its new vault toilet, providing a convenient stop along the trail from Smoky Mountain Campground to Indian Grove and Bread Loaves. There will be a hitching post so riders may hitch their horses and walk a short distance to the vault toilet.

## **Alternatives Considered**

### ***Alternative 1: No-Action***

Under the Alternative 1, the trail system would remain the same. There would be no geological interpretive trail, no overlook into the Circle Creek Basin, and no Smoky Mountain Connector from the City of Rocks Road to the Circle Creek Service Road.

Leaving the trail system in its current state means the visitor will not have a self directed means of learning about the Reserve's complex geological features in the Reserve. The visitor would also not have the opportunity to view the Circle Creek Basin from a prime vantage point. The visitor would also not have the opportunity to view the Precambrian rock exposures and microclimate of the eastern edge of the Reserve.

The equestrian visitor would have to continue to take horses on the City of Rocks Road and the Circle Creek Overlook Road to reach the North Fork Trail. As a horse and rider travel on the roads the potential for a horse/vehicle conflict arises. Removing the horse and rider from the roads will increase safety of the horse and rider as well as the driver.

### ***Alternative 2: Trail Construction***

Alternative 2 was the selected alternative. A full description is provided below in the Selected Alternative Section.

### ***Options Considered and Dismissed***

Reserve staff and the interdisciplinary team considered the Reserve facilities, topography, and geology and presented Alternative 2 as the best place to have the Geological Interpretive Trail because it had the densest display of geologic features for interpretation, the topography was amenable to trail construction and maintenance and it was close to a (planned) parking facility. The Equestrian Trail was cited in the proposed location to serve as a substitute for the City of Rocks Road and Circle Creek Overlook Road while being an easily maintainable trail.

## **Environmentally Preferred Alternative**

The environmentally preferred alternative is determined by applying criteria identified in section 101 of the National Environmental Policy Act of 1969, as amended (NEPA) to each alternative

considered. Alternative 2 was determined to be the environmentally preferred course of action because it is consistent with the enabling legislation and values of the Reserve.

#### Environmental Consequences - Why the Selected Alternative Will Not Have a Significant Effect

Construction of the 1.6 miles of trail, the Preferred Alternative described in the EA, will include minor vegetation removal, installation of 13 posts locating the interpretive stops, a hitching post for horses, and one retaining wall as a water control feature where the geological interpretive trail crosses an ephemeral drainage. Overall, the action is expected to result in long-term, minimal impacts to hydrology, and soils. Appropriate treatments, applied as necessary, will prevent the establishment and spread of invasive weeds. Native plants established on the site will blend with the surrounding vegetation over time, creating a dynamic native plant community. Eventually, ecological processes would return to near pre-disturbance conditions. There are no special status species in the project area. There are no effects to cultural resources. The completion of the project with the new trails and interpretive signage will enhance the visitors experience thus long-term impacts to recreation will be beneficial.

With due consideration for the ten criteria as defined by 40 CFR 1508.27, staff determined that implementing the selected alternative will not significantly affect the environment. In particular, the foreseeable impacts of the project, whether taken individually or as a whole, do not reach the level of significance. Most of the adverse impacts are temporary and occur during construction and will be mitigated with best management practices. The selected alternative would have long-term beneficial effects on visitor experience and safety. The proposed actions have not generated public controversy - in fact, despite notice of public review of the EA, no comments were received. The project will not directly affect historic properties, prehistoric resources, or ethnographic resources. No known archeological resources occur at the project site, but as a precaution, intervention will be enacted in the event of an unexpected discovery to prevent any unanticipated impact to archeological resources. As noted below, the park conferred with USFWS and IDFG, and determined that neither any species status species nor habitat would be affected.

### Measures to Minimize Environmental Harm

The selected alternative includes resource protection measures designed to minimize harm to the environment. These measures and park personnel responsible for satisfactory completion are summarized in the following table.

| Mitigation Measure   | Actions   | Responsible Party                               |
|--|---|---|
| Construction of 1.6 miles of trail with signs indicating the interpretive stops. | Construct trails lot with appropriate design, surfacing and control measures (for example, water bars) to hold erosion rates to negligible levels and channel run off properly. | Climbing Ranger/<br>Natural Resources<br>Ranger |
| Cultural Resources   | Monitor earth moving to ensure no inadvertently discovered cultural material is damaged during the project  | Chief of Cultural<br>Resources                  |

| Mitigation Measure | Actions  | Responsible Party       |
|--------------------|--|-------------------------|
| Weed prevention    | If necessary, apply appropriate site treatments (physical, biological, or chemical) to prevent the establishment and spread of invasive weeds. | Natural Resource Ranger |

## Public, Agency, and Tribal Involvement and Consultation

Initial scoping of the project included issues already identified in the Reserve's Comprehensive Management Plan, such as protection of the CNHT, restoration of disturbed areas, and cooperation with owners of private in-holdings. A 30-day comment period was provided for public review of the EA from August 1, through September 1. Notices of availability for the EA were submitted to newspapers in Idaho (Idaho Statesman, Idaho State Journal, and the Times-News – July 30). The Idaho Statesman of Boise has a state-wide readership and the Idaho State Journal and the Times-News are based in Pocatello and Twin Falls, respectively. The Post Register in Idaho Falls and the Weekly Mailer in Burley were notified. In addition, KMVT and KTVB television stations in Twin Falls and Boise respectively, were informed. During that time, copies of the EA were available to the public at the City of Rocks National Reserve Visitor's Center and administrative office. The City of Rocks National Reserve maintains a group email list of stakeholders who frequently request information about the Reserve. An email was sent to the group. Additionally, notices of availability for the EA were publicly posted in the general store/post office in Almo, Idaho. The EA was also available for download from the Reserve's web site as well as the NPS Planning, Environment, and Public Comment (PEPC) website.

During the public comment period, no comments were received, and only one correction to the text of the EA was required. The Geological Interpretive Trail will have 13 stops instead of the 12 proposed in the EA. This additional stop will not alter the path of or lengthen the trail.

In October 1993, Robert K. Moseley, Plant Ecologist with the Idaho Department of Fish and Game published *The Status and Distribution of Christ's Indian Paintbrush (Castilleja christii) and Davis' Wavewing (Cymopterus davisii) in the Albion Mountains, Sawtooth National Forest and City of Rocks National Reserve*. The study determined that Davis' wavewing occurs on Graham Peak within the Reserve, that it is endemic to the Albion Mountains, that its population is local and rare, and that the NPS should treat Davis' wavewing as a sensitive species in developing management plans at City of Rocks National Reserve.

Informal consultation with the USFWS has determined that Christ's Indian paintbrush (*Castilleja christii*) is a candidate species for listing under the Endangered Species Act of 1973, as amended. NPS policy requires an analysis of impacts to federal candidate species, even though they are not formally protected under the ESA. Christ's Indian paintbrush is not known to exist within the Reserve. The only known population is located several miles to the north on Mount Harrison. Within the Reserve, the only area that offers habitat that is potentially suitable for this species is the top of Graham Peak. The study indicates that no listed species are present in the project area and that no issues have been identified that indicate consultation under Section 7 of the Endangered Species Act is needed for this project.

An archeological survey of the APE, completed by Chief of Cultural Resources, Kristen Bastis, M.A. in April and May 2011, found no cultural material. The Idaho State Historic Preservation Office of the Idaho State Historical Society has participated in the scoping and review of the project, and their June 28, 2011 letter affirmed their support of the finding of no effect.

Native American consultation regarding this project was included in the consultation for the CMP.

## **Basis for Decision**

The NPS selected Alternative 2 over not taking action because it is consistent with the purposes of the Reserve as stated in the enabling legislation. The construction of the new 1.6 miles of trail will cause an impact to vegetation; however, this impact will be localized and minor. There are no endangered, threatened, or species of concern in the project area. There will be no effect on cultural resources. The project will remove the existing vehicle/horse and rider conflicts by moving the equestrian users off the roads, thereby improving visitor safety. In addition, the visitor experience of the nationally significant geology will be enhanced by providing an opportunity for interpretation and education.

Alternative 1 was not selected because it does not assist the Reserve in managing recreation and providing educational opportunities for visitors. In addition, the conflicts between vehicles and horse and riders are detrimental to the safety of all visitors.

## **No Impairment of Park Values**

The National Park Service has determined that implementation of the selected alternative will not constitute an impairment to City of Rocks National Reserve's resources and values. This conclusion is based on a thorough analysis of the environmental impacts described in the EA and the professional judgment of the decision-maker guided by the direction in NPS 2006 Management Policies, since no comments from the public were received public comments were not included in the analysis. Although project implementation has some minor adverse impacts, in all cases these impacts result from actions taken to minimize or eliminate other impacts necessary to preserve and restore park values and increase visitor safety. Overall, the project results in benefits to park resources and values, opportunities for their enjoyment, and it does not result in their impairment.

In particular, the project will not impair any of the natural or cultural resources within the APE because adverse effects on soils will be short term but the long term effects will be minimal. The effects on water are short term and the long term effect will be minimal. The effect on vegetation will be long term but minor and localized. The effect on wildlife will be minimal as construction will take place in the fall and be confined to daylight hours. The long term effect may be beneficial as a new path will be open through the sage brush steppe. There will be no effect on prehistoric or historic archaeological sites, historic structures or the cultural landscape and viewshed of the CHNT. The opportunity to appreciate the nationally significant geology will be enhanced. In addition visitor safety, particularly related to vehicle/horse and rider conflicts will be improved.


## Conclusion

Implementing the selected alternative does not constitute an action that normally requires preparation of an EIS, and will not have a significant effect on the quality of the human environment. Negative environmental impacts that could occur are minor in intensity and short term in duration. There are no unacceptable impacts on public health and safety, park operations, or visitor use. No highly uncertain impacts, unique or unknown risks, or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection law.

Based on the foregoing, as well as the capability of mitigation measures to minimize or eliminate potential environmental consequences, and with due consideration for the minor nature of public response, the NPS finds that construction of the 1.6 miles of trail, as described above and detailed in the EA, does not constitute a major federal action that will have a significant effect on the quality of the human environment. Therefore, construction the Circle Creek Overlook Trails Project may be implemented as soon as practicable.

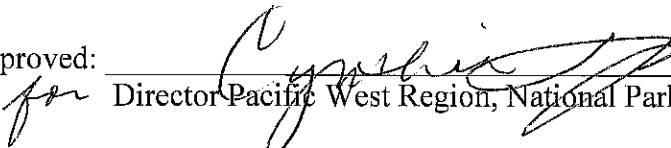
## Signatures

Recommended:

  
\_\_\_\_\_  
Superintendent, City of Rocks National Reserve

Date September 7, 2011

Approved:

  
for \_\_\_\_\_  
Director Pacific West Region, National Park Service

Date 9/13/2011