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PACIFIC WEST REGIONAL OFFICE Memorandum

L7617 (PWRO-P)

SEP 22 2017

Memorandum

To: Superintendent, Death Valley National Park
From: Regional Director, Pacific West Region
Subject: Completion of Environmental Compliance Process for Towne Pass Curve
Correction, Inyo County, CA

The Finding of No Significant Impact (FONSI), received on September 18 2017, is approved. The project will upgrade State Route 190 to current design standards and to correct safety **deficiencies related to dangerous curves. The project maximizes safety while providing for the** least impacts to natural and cultural resources.

To complete the environmental compliance effort, the FONSI and Errata for the environmental assessment should be made available to all individuals and organizations that received or commented on the draft and final environmental assessments.

Thank you for your submissions on the plan to the September 6, 2017 PWR Public Affairs Weekly Report, and for your good work during the planning process.


for Laura E. Joss

Attachments:
Finding of No Significant Impact
Determination of No Impairment

FINDING OF NO SIGNIFICANT IMPACT

**Towne Pass Curve Correction
A Federal Highways/California Department of
Transportation Project**

**In cooperation by MOU with
National Park Service, U.S. Department of the
Interior Death Valley National Park
September 2017**

Introduction

Death Valley National Park and the California Department of Transportation (known as Caltrans) entered into an agreement regarding a curve correction traffic safety project on State Route 190, a Federal Aid Highway that traverses the park. The Federal-aid Highway Program (FAHP) is a federally-assisted program of State-selected projects. The Federal Highway Administration (FHWA) and the State Departments of Transportation (State DOTs) have long worked as partners to deliver the FAHP in accordance with Federal requirements. In enacting 23 U.S.C. 106(c), as amended, Congress recognized the need to give the States more authority to carry out project responsibilities traditionally handled by FHWA. Caltrans has been delegated by the Federal Highway Administration to act as Federal highways within the state and is the designated lead federal agency pursuant to 23 USC 327 for this project.

In that role and by agreement, Caltrans prepared a joint NEPA/CEQA document; which is, by this statement, adopted by the NPS. Some text has been copied and pasted directly from the document. The document included all required obligations concerning 401/404 permitting, Threatened and Endangered Species, consultation with Tribes and State Historic Preservation Officer, adherence to Executive Orders and other required by Federal and State statutes and law. The document was a CEQA Initial Study with Mitigated Negative Declaration/NEPA Environmental Assessment and Section 4(f) Evaluation. The document included a 4(f) determination for impacts to Death Valley as a "publicly owned park" approved by the DOI. Additionally, a tri-party (CA SHPO, NPS, and Caltrans) Memorandum of Agreement (MOA) for an adverse effect to the Eichbaum toll-road an historic property that is treated as eligible for the NRHP was prepared.

Purpose and Need for Federal Action

State Route 190 is the only state highway that provides a travel route from the west into Death Valley National Park. The highway enters the park from the west at milepost 41 and exits at milepost 127 at the east boundary. Travelers from all over the world who fly into Las Vegas use State Route 190 as the gateway to and through Death Valley National Park to the Owens Valley, Manzanar National Historic Site, and points beyond. This highway is also the main thoroughfare for regional auto and limited truck travel in the area and provides a connection between the communities of Baker, California and the communities of the Owens Valley including Olancho, Lone Pine, Independence (the County Seat of Inyo County), Big Pine, and Bishop. The highway intersects with Interstate 15 at Baker, CA and US 395 in Olancho, CA.

“Caltrans accident data showed that the curves in a .6 mile stretch of the highway were not adequate for the nature of travel. The total accident rate in the project area is 4.37 times the statewide average, and the combined Fatal and Injury (Fatal + Injury) accident rate is 7.29 times the statewide average for a similar facility as identified by accident data from 2009 to 2014.”

“Within the project limits, the current highway alignment consists of six curves, with curve radii of 390 feet, 350 feet, 920 feet, 385 feet, 560 feet, and 2,292 feet, respectively. The standard curve radius for 55 miles per hour is 960 feet. A smaller curve radius indicates a tighter curve, which must typically be negotiated at a slower speed; a maximum comfortable speed for a typical two-lane conventional highway, such as that present in the project area with a curve radius of 400 feet, is 35 miles per hour. Additionally the reversing nature of the curves in the project area create additional challenges and further reduce the comfortable driving speed for the entire length of the project area.”

“The stopping sight distance in the project area is as low as 166 feet due to the interaction between crest vertical and horizontal curves. Sight distances associated with this distance would provide for complete stopping only for vehicles moving at about 25 miles per hour. A sight distance of 500 feet provides for complete stopping for vehicles moving at approximately 55 miles per hour.”

“Paved shoulder widths in the project area range from 0 to 2 feet. Cut slopes are steep, nearly vertical, and are deeply eroded with shallow channels and gullies. Vegetation has not naturally reestablished on cut slopes, and the potential exists for the slopes to shed rocks onto the roadway. (Caltrans, Initial Study Environmental Assessment, 2017).”

ALTERNATIVES CONSIDERED

No-Action Alternative

The no build alternative: no action would be taken, no curves would be straightened or flattened. Curve radii would remain the same and accident data would be monitored.

Selected Alternative

The build alternative: the project would upgrade the highway to current design standards and to correct safety deficiencies from the non-standard curves. The NPS and Caltrans collaborated on design features that maximize safety while providing for the least impacts to natural and cultural resources.

Caltrans proposed the build Alternative 1 which is to “realign the roadway from post miles 69.2 to 69.8 using a 55-mile-per-hour design speed. There are no anticipated exceptions to design standards with this alternative. The current six curves will be reduced to three. Alternative 1 proposed a paved shoulder width from 4 to 8 feet. However, final design limits the shoulders to 4 feet maximum. This new alignment will be constructed east of the existing

alignment. To facilitate the new right-of-way, a Highway Easement Deed from Death Valley National Park will be obtained. During construction, traffic will be maintained by one-way traffic control on the existing roadway, temporary graded dirt surfaces, and/or newly constructed roadway. After construction, portions of the existing roadway not used in the new alignment will be removed. Existing cuts no longer needed for sight distance or shoulders will be stabilized with earthen material from onsite. Both the removed roadway and stabilized cuts will be contoured to look more natural.”

Caltrans proposed the following safety Improvements:

- Increase curve radii to meet current 55-mile-per-hour design speed standards
- Provide uphill and downhill stopping sight distance to meet current design speed standards
- Construct standard super-elevation rates and transitions
- Stabilize cuts and provide rock catchment
- Widen shoulders to a width of 4 to 8 feet (shoulder width in final design is 2-4 feet due to concerns of NPS over cuts and fills).
- Installation of skip pattern rumble strips (due to soundscapes concerns raised by the NPS and visitor comments, this option was not carried through at this time).

The total length of the project is 2.1 miles to incorporate construction signage, but the build area is 0.6 mile in length. Within the limits of the proposed project, State Route 190 is a conventional two-lane, undivided highway with two 12-foot lanes and 0- to 2-foot non-standard shoulders.

ALTERNATIVES CONSIDERED BUT DISMISSED

Alternative 2

Alternative 2 proposed to cross the adjacent drainage with a slightly more eastern alignment compared to Alternative 1 and west of the current alignment of State Route 190. This alternative was part of a preliminary look at design options within the project area and would have created a straighter alignment. As design information became available, Alternative 2 was further refined to balance design constraints and reduce potential costs, resulting in Alternative 1.

Alternative 2 would have resulted in approximately 6,000 cubic yards of excess material. The Hydrology Report (January 2016) discussed the 25-, 50-, and 100-year storm events in the Towne Pass area and the volume of water that would need to be handled. To accommodate the potential storm water, large water conveyance structures, such as bridges and/or large multi-box culverts, would be required. The new structures would require ongoing maintenance, further escalating costs.

Alternative 3

This alternative was part of a preliminary look at design options within the project area and would have created a straighter alignment. Construction of this alignment would require approximately 12 acres of ground disturbance, including approximately triple the cut slopes of those proposed in Alternative 1, resulting in substantially more excess material than Alternative 1, and very little need for fill soils.

The escalated construction and mitigation costs (as a result of greater environmental impacts), the increased environmental impacts due to greater acreages impacted (approximately 12 acres when including estimated cut-slopes).

Table 1. Mitigation Measures of the Selected Alternative

The following table enumerates protection measures.

General Considerations	Caltrans/Federal Highways	National Park Service
Vegetation	Install vertical mulch to trap seed bearing bodies of native plants, and Mojave fish-hook cactus will be transplanted outside of the construction zone in suitable soils. Plantings will mimic natural distribution.	Staff will monitor the effectiveness of vertical mulch, regrowth of vegetation and for invasion by exotic plant species.
Water Quality and Soils	Contour cut and fill slopes to blend into surrounding terrain. Permits will be obtained for alterations in Emigrant Wash as required by the California Department of Fish and Wildlife, the Regional Water Quality Board, and the US Army Corps of Engineers.	Cooperate with Caltrans to ensure that work is engineered and approved according to permitting agency and NPS guidelines.
Wildlife	Conduct pre-construction surveys and presence of sensitive species will be reported to the NPS. Construction will be paused until the species leaves the area. Any of the species of concern are likely to be passing through and not in residence of the project area.	Coordinate with Caltrans biologists during surveys and monitoring. Construction must take place outside the nesting bird season to avoid impacts to these species.

Visitor Experience, Public Health, Safety, and Park Operations	One-lane traffic control by Caltrans or contractors would cause minimal delay because the work zone is short and daily traffic is light.	Patrol staff and roads and trails staff will monitor.
Cultural Resources	Carry out stipulations of MOA.	Carry out stipulations of MOA.

Rationale for Decision

The Selected Alternative was chosen because it best meets the purpose and need for the project which is to upgrade the highway to current design standards and to correct safety deficiencies from the non-standard curves while providing for the lowest acceptable environmental risk and minimizations of impact to cultural and natural resources.

WHY THE ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT

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

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

Implementation of the preferred alternative will result in an adverse effect to the Eichbaum Toll Road and temporary adverse impacts to soils and vegetation; however, the overall public safety benefit of the project outweighs the negative effects. Visitor enjoyment and safety will benefit from measures to smooth and flatten the curves which have been the location of serious accidents in the past.

Degree of effect on public health and safety

The existing curves in this location are particularly tight, have limited sight distance, and super-elevations that cause banking. The curve corrections will correct these issues. The expected reduction in serious crashes will have a long term beneficial effect on public health and safety.

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

Public scoping and comments gathered by Caltrans were generally in favor of the project with

some design changes such as the minimization of the amount of cuts and fills and with the deletion of rumble strips from final design drawings. Rumble strips were proposed as a safety mitigation, however, due to noise impacts that could affect the visitor experience of solitude in nearby Wilderness and other park areas they were not included in final design drawings. The installation of rumble strips in this location could also have set a precedent for use in other parts of the park.

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

The detailed and thorough analysis in the Environmental Assessment and CEQA Initial Study left little to no uncertainty. The project is necessary to correct an existing significant human health and safety impact. The improvements will reduce negative impacts to the quality of the human environment.

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

The Towne Pass Borrow Pit/Material site will be utilized by Caltrans via a Special Use Permit issued by NPS. Up to 12,000 cubic yards of excess earthen material will be hauled and stored at the site. This site has not been used for a number of years and was considered inactive. The issuance of the SUP will reactivate use of the site. The action is not a significant precedent and will not significantly set the stage for future decisions. An Environmental Assessment for the materials site was prepared in 2008 with a FONSI was signed in October of that year.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts

Road realignments have been undertaken previously in other parts of Death Valley NP including on the same highway at a location known as the Towne Pass Rock fall project and the Bonnie Clare road in 2012. There were some portions of the road that were redesigned to accommodate larger vehicles such as buses and motor coach recreational vehicles. Although, this realignment in Towne Pass is of a broader scale, the action is not expected to result in negative cumulative impacts.

Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources

The project will adversely affect a linear foot portion of the 30 mile plus remnants of the Eichbaum Toll Road, which is believed to be eligible for the NHRP and treated as such. The State of California SR 190 itself has not been determined eligible even though the route of the highway is of historical significance. The current alignment of SR 190 subsumes much of the Eichbaum Toll Road in the project location. With the selection of Alternative 1, construction of the project will directly affect and obliterate a total 287 linear feet of the Eichbaum Toll Road: 152 feet of Segment D and the entire 135 feet of Segment E. A man-made Rock Feature F1 is

included within the length of Segment E and will also be directly affected. NPS, Caltrans, and the SHPO have signed a joint MOA (April 12, 2017) for the adverse effect which includes the following stipulations and mitigation strategy:

- Development of a context to support a National Register Nomination for the Eichbaum Toll Road in coordination with DEVA staff. Agency responsibilities include Caltrans providing the contextual development of the resource and Death Valley National Park conducting a more comprehensive survey of the road. The historic context will also include discussion of State Route 190 as it relates to theme of tourist travel and transportation during the early days of Death Valley National Monument.
- An in-depth recordation of the segments D and E prior to demolition.
- Caltrans will develop and host a website dedicated to the Eichbaum Toll Road and related topics. A link to the website will be provided to Death Valley NP for use as desired.

Degree to which the action may adversely affect an endangered or threatened species or its critical habitat and other wildlife habitat.

Avian species such as Brewer's sparrow (*Spizella breweri*), Le Conte's thrasher (*Toxostoma lecontei*), prairie falcon (*Falco mexicanus*), and burrowing owl (*Athene cunicularia*) may have the potential to occur within the Biological Study Area. Mammalian species with the potential to occur within the Biological Study Area are desert bighorn sheep (*Ovis canadensis nelsoni*) and Townsend's big-eared bat (*Corynorhinus townsendii*). One reptile species, the rosy boa (*Charina trivirgata*), also has the potential to occur within the project area. The proposed project is not expected to impact these species. To date, none of the species have been recorded within, adjacent or in proximity to the project area of potential effect.

Pre construction migratory/nesting bird surveys will be conducted up to and within 48 hours of start of construction activities, if construction is conducted during nesting season (February 15 to September 30). Species specific nesting surveys (i.e. predatory birds) will be conducted during specified survey protocol recommendations. Burrowing owl surveys will be conducted during breeding season as they are more detectable during this period. Additional species-specific surveys will be conducted prior to construction for Le Conte's thrasher and Prairie falcon. Construction will be paused until the species leaves the area. Any of the species of concern are likely to be passing through and not in residence of the project area. Construction must take place outside the nesting bird season to avoid impacts to these species.

There are two plant species that are considered by the State of California and the NPS to be sensitive; these are the black milk vetch (*Astragalus funereus*) and Mojave fish-hook cactus (*Sclerocactus polyancistrus*). Five individuals were located during surveys and will be transplanted in coordination with the National Park Service Biologist prior to construction. Additional pre-construction surveys will occur and avoidance measures will be enacted to reduce impacts to the fish-hook cactus. If cacti are found in the construction path, they will be re-located nearby outside of the construction zone in suitable soils. Plantings will mimic natural distribution.

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

The .6 mile segment of the project area does contain an historic resource, the Eichbaum Toll road and the historical route of the SR 190 which subsumed most of the footprint of the toll road. The project will result in a mitigated adverse effect. The NPS, Federal Highways (Caltrans), and the SHPO have signed an MOU as required by the National Historic Preservation Act (NHPA). The MOU has been shared with the Advisory Council on Historic Preservation and the Timbisha Shoshone tribe as a courtesy. Neither party was a signatory.

There are no wetlands present within the project area. There are several drainages and an ephemeral dry wash (Emigrant Wash) within the project area. The drainages capture runoff during storm events that drain into the Emigrant Wash through culverts below the highway. These drainages (also called intermittent crossings) occur at post mile 69.2, 69.4, 69.5, and 69.6. Emigrant Wash extends the entire project length (post mile 69.2-69.8) and varies in distance from the highway. Emigrant Wash is dry most of the year and only sees water flow during heavy storms. The estimated 100 year storm event flow rate is between 500 to 300 cubic feet per second (cfs) (Hydraulic Report, 2016).

These features are both state jurisdictional waters and Waters of the United States (WOUS). Coordination has begun between Caltrans and the regulatory agencies: the United States Army Corps of Engineers (USACE), the California Department of Fish and Wildlife (CDFW), and the Lahontan Regional Water Quality Control Board (LRWQCB). Permits will be obtained from each agency to conduct work that will impact the bank of Emigrant Wash.

Whether the action threatens a violation of federal, state, or local environmental protection law

There are no portions of the action or the action itself which threaten a violation of law. The project was planned with the utilization of guidance of NEPA, CEQA, Section 4(f), NHPA, the Clean Water Act the Executive Order for the Protection of Wetlands (EO 11990), and Migratory Bird Act and coordination with State and Federal agencies.

PUBLIC INVOLVEMENT

Public Scoping

The project was included in the Transportation Concept Report for State Route 190 (2003) which was routed to Death Valley National Park and was posted on the Caltrans public website. Additionally, the programming request was heard at the California Transportation Commission Hearing in the 2014 SHOPP plan, approved by the CTC on March 20, 2014 (meetings are open to the public with agendas and minutes and hearing books posted online)(basic project information is provided in the hearing book for the CTC Meeting). Additionally status updates on the project are included in the quarterly Local Transportation

Commission meetings (which are also open to the public).

Caltrans released a public notice of intent and basic project description and map in local newspapers on September 20, 2016 that stated study results were available and asked if the public wanted a public hearing on the changes proposed for State Route 190. The NPS requested that Caltrans hold a public meeting in Death Valley National Park for residents from Cow Creek Village, Panamint Springs Resort, Stovepipe Wells, Furnace Creek Ranch and the Timbisha Tribe and park visitors.

The NPS shared the project with the public via a press release on September 30, 2016 and the Planning, Environment and Public Comment website asking that the public comment directly to Caltrans.

Review of the Environmental Assessment

Caltrans as the lead Federal agency was responsible for the dissemination of the document and the public comment period of September 20, 2016 to November 9, 2016. Public comments on the Environmental Assessment/Initial Study were solicited through placement of copies of the document from September 1, 2016 through November 16, 2016 at the Lone Pine Public Library, the Pahrump Public Library, the Stovepipe Wells Ranger Station, Furnace Creek Visitor Center, and the Caltrans District 9 Office in Bishop for public review. A digital copy of the document was made available both on the Caltrans District 9 website and through the National Park Service's Planning, Environment and Public Comment website (<https://parkplanning.nps.gov/deva>). A public notice regarding the availability of the document was placed in the Inyo Register on September 22, September 27 and October 4, 2016. Two additional public notices were published in the Inyo Register newspaper on October 6 and October 8, 2016 announcing both the public hearing and the availability of the document.

An open house format public hearing for the project was held on November 1, 2016 from 4:00 pm to 7:00 pm at the Furnace Creek Visitor Center in Death Valley National Park. Five members of the public signed in, and 13 local residents signed in. One written comment was submitted which raised the issue of cumulative safety effects in nearby highway locations, adverse effects to the Eichbaum Toll Road, opposition to rumble strips, and disagreement that the project proposal did not have scenic value impact.

Verbal comments and questions were primarily focused on noise impacts from proposed rumble strips, adverse effects to the Eichbaum Toll Road, cumulative safety impacts such as widened shoulders that may encourage visitors to park on shoulder.

The rumble strips were removed from the design specifications. Adverse effects to the Eichbaum Toll Road were resolved in an MOA with the SHPO, Caltrans and the NPS. Shoulder widths were reduced in width in the design specifications.

TRIBAL CONSULTATION

Per agreement with the NPS, Caltrans was the lead federal agency responsible for the completion of Section 106 of the National Historic Preservation Act including Tribal

consultation. NPS consulted with the Timbisha Shoshone Tribe, as outlined in the agreement with Caltrans, because Death Valley National Park contains their traditional homeland. The Tribe participates in planning efforts with the park, attends monthly environmental compliance meetings, and holds quarterly project coordination meetings. Regular updates on the project were shared and in one instance a cooperative planning meeting that included Caltrans, the NPS, and the Tribe was conducted on Nov. 1, 2016. The NPS sent formal government-to-government consultation letters on October 4, 2016 and shared the MOA for the adverse effect to the Eichbaum Toll Road with the Tribal Chairman and THPO on May 23, 2017. No responses were received.

The Tribe was not a signatory participant in the adverse effect MOA for the Eichbaum Toll Road, but a copy of the agreement was made available. The Tribal Historic Preservation Officer (THPO) was in attendance at a joint Caltrans and NPS planning meeting and raised no objections to the construction project. The THPO urged Caltrans to be cognizant of the presence of chuckwalla, a lizard which is an historical ethnographic resource. Caltrans addressed the concern in the environmental document. Protection measures will be taken to avoid impacts to wildlife including reptiles.

The following text is adopted from the Caltrans environmental document.

“On April 7, 2015 Caltrans District 9 archaeologist, Stacey Zolnoski, initiated Section 106 and AB-52 consultation by sending letters to the following tribal representatives: Tribal Historic Preservation Officer (THPO) Barbara Durham and Chairman George Gholson of the Timbisha Shoshone Tribe and THPO Kathy Bancroft and Chairperson Mary Wuester of the Lone Pine Shoshone Paiute Tribe. The letters provided a description of the project including a location map and asked if they had any concerns or knowledge of cultural resources within the project area. That same day Caltrans District 9 archaeologist, Stacey Zolnoski also sent a letter of inquiry requesting a search of the sacred land files to Katy Sanchez at the Native American Heritage Commission (NAHC). On May 8, 2015 Caltrans received a letter of response from Katy Sanchez of the NAHC stating that “a records search of the Sacred Lands Inventory failed to indicate the presence of cultural resources in the immediate project area”

On September 19, 2016, Caltrans District 9 archaeologist, Stacey Zolnoski, conducted follow-up calls with Kathy Bancroft, Barbara Durham and Anthony Madrigal, Jr. Ms. Bancroft and Ms. Durham had no concerns about the project and requested final copies of the archaeological survey report. Mr. Madrigal, Jr. did not recall the project and asked for a final copy of the report (Caltrans, IS/EA 2017).”

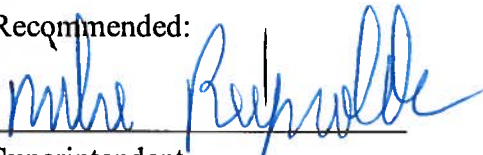
STATE HISTORIC PRESERVATION OFFICE CONSULTATION

Caltrans per agreement with the NPS was the lead agency for the project and consulted with the California SHPO accordingly. Caltrans initiated consultation with the SHPO on June 23, 2016 and on December 1, 2016 the SHPO concurred with the finding of adverse effects to the Eichbaum Toll Road. The Death Valley Section 106 Coordinator, park archeologist and other staff worked closely with Caltrans as reviewers of survey reports and other documentation and found them to be adequate. NPS staff shared the MOA with the SHPO and the Timbisha Shoshone Tribe. As previously stated the project will result in an adverse effect to remnants of the Eichbaum Toll Road. An MOA between Caltrans, California SHPO, NPS was signed on April 12, 2017. The MOA was shared with the SHPO by NPS on May 23, 2017.

CONCLUSION

The Park has determined that the Selected Alternative is not an action that will have a significant effect on the quality of the human environment. Negative environmental impacts that could occur are short term visual impact due to the presence of construction equipment, safety devices such as signs and construction fencing, a longer term visual impact from the change in the footprint of the road in relation to the adjacent landscape. There are no significant impacts on public health, public safety, threatened and endangered species, or other unique characteristics of the region. There is an adverse effect to a portion of the Eichbaum Toll road. The NPS is a signatory on the adverse effect Memorandum of Agreement with the State Historic Preservation Office and Caltrans/Federal Highways. However, the level of this adverse effect has been mitigated and the level of impact does not significantly impact the remainder of the cultural resource. No highly uncertain or controversial impacts or unknown risks, significant cumulative effects, or unacceptable environmental impacts were identified. Based on the foregoing, it has been determined by the Superintendent that an EIS is not required for this project and thus will not be prepared. Implementation of the alternative will begin as soon as practicable.

Recommended:


Superintendent

9-12-17
Date:

Approved:


Regional Director, Pacific West Region

9/22/17
Date: