Finding Of No Significant Impact

Tassi Ranch Site Management Plan

National Park Service, US Department of the Interior

Grand Canyon-Parashant National Monument

February 2019

INTRODUCTION

This Finding of No Significant Impact (FONSI) documents the decision of the National Park Service (NPS) to adopt the preferred alternative in the Tassi Ranch Site Management Plan Environmental Assessment (EA) in accordance with the 1969 National Environmental Policy Act (NEPA), the NPS NEPA guidance in Director's Order 12 (2011) and the NPS NEPA Handbook (2015). This FONSI combined with the Tassi Ranch Site Management Plan EA from February 2019, comprise the full and complete NEPA record of the analysis of environmental impacts and the NPS decision-making process on selecting an implementation strategy.

This document summarizes the alternatives considered in the EA and identifies the Selected Alternative. It includes the decision rationale for selecting Alternative A for implementation. The FONSI lists the specific actions the NPS will follow when implementing the plan and explains the reasoning behind the statement that the Selected Alternative will result in no significant impacts to the environment as defined by NEPA regulations (41 CPR pts. 1500-1508) and NPS NEPA guidance in Director's Order 12. The FONSI and the EA will guide future actions for the implementation of this plan.

BACKGROUND

Tassi Ranch and the associated springs is the most intact example of the historic vernacular landscape subset of cultural landscapes on Grand Canyon-Parashant National Monument (PARA). It is considered historically "significant for its association with the historical development of cattle ranching in the remote, arid country of the Arizona Strip; and also because the ranch house and associated structures embody the distinctive characteristics of a type, period, and method of construction." (NPS 2013). As early as 1903, Tassi Springs has been claimed for use by sheep and cattle operations. The defined period of historical significance is 1936 to 1947, the period when Ed Yates built the majority of the existing buildings and ran cattle at the site.

Since the 1980s, the NPS has maintained the ranch structures and worked to stabilize the site. Since 2000, Tassi Ranch has been within the boundary of PARA, jointly managed by the NPS and Bureau of Land Management (BLM). Previous work at the site has been accomplished following a variety of plans, most notably the 2007 Tassi Ranch and Springs Interim Treatment

Plan. Previous projects have included fence repair and stabilization (Tassi Ranch Fence Construction PEPC-17393), removal of non-historic grazing apparatus (Remove Abandoned Grazing Facilities and Rehabilitate Sites - Tassi Grazing Allotment PEPC-26819), invasive plant removal (Invasive Plant Management Plan PEPC-11501), structure repair (Stabilize Tassi Ranch Structures PEPC-25166), and native vegetation and aquatic habitat restoration (Restore Tassi Springs Native Vegetation and Rare Aquatic Animal Habitat PEPC-24556).

In 2013, the Tassi Ranch Cultural Landscape Report/Historic Structures Report (CLR) was finalized by NPS. This report provided a series of treatment recommendations to maintain the cultural landscape and historic structures while promoting visitor safety and preserving biologically significant natural resources. PARA is directed to consider this report and implement the treatment recommendations to remain in compliance with national and local goals for historic areas.

PURPOSE AND NEED FOR FEDERAL ACTION

The purpose of the proposed action is to implement recommended actions from the CLR, maintain viable habitat for the special status riparian and aquatic species in the project area, and provide sustainable visitor use. The need for the proposed action is to protect the integrity of the cultural landscape, including historic structures, modern visitor infrastructure and historically appropriate vegetation.

ALTERNATIVES AND PRELIMINARY OPTIONS CONSIDERED

The EA analyzes two alternatives and their impacts, Alternative A the Proposed Action, (Section 2.2.1 of the EA), and the No Action Alternative, Alternative B (Section 2.2.2 of the EA).

Three preliminary options alternatives were considered, but not carried forward and analyzed as alternatives: Abandonment of Site to Natural Forces (Section 2.3.1 of the EA), Restriction of Site Upkeep and Modification to Ranch Core (Section 2.3.2 of the EA), Prioritization of Restoration of Natural Features over Restoration of Cultural Features (Section 2.3.3 of the EA).

SELECTED ALTERNATIVE SUMMARY

Based on analysis presented in the EA, the Monument will implement Alternative A, Proposed Action, as detailed and analyzed in the EA, including design features and conservation measures, in Section 2.2.1 and Appendices A through D (no modifications are incorporated in the selected alternative). The proposed action was developed to attain the specific management goals outlined in the PARA GMP/RMP. The CLR developed by the NPS Pacific West Region Cultural Resources Program is the primary guidance for site management at Tassi Ranch.

Historic Structures and Landscape Elements

Historic Structures (HS) and Landscape Elements (LE) have been derived from the CLR. HS and LE, collectively known as Contributing Elements (CE) are defined as components of the

historic landscape that are integral to the desired look and feel of the site from a historical perspective as determined during the NPS cultural landscape documentation process. The HS include a ranch house, shed, barn, spring boxes, stock tank, lambing pen, and fence/corral system. The LE include fields, irrigation ditches, holding ponds, ranch yard, ranch road, and a row of nine cottonwood trees along the front ranch core fence.

Annually, the HS will be inspected and/or repaired. Repairs will follow the Secretary of the Interior's Standards for the Treatment of Historic Properties. Repairs may, however, also include non-historic elements if 1) the historically appropriate materials will present a danger to the public or 2) the non-historic elements provide a similar visitor experience while not decreasing the historical value of the site. Debris will be removed from in and around the HS and the LE. Debris will be removed using several methods including hand removal, shoveling, cutting or raking. Debris will be disposed of as appropriate.

The springbrook, a functioning section of the irrigation ditch, may be extended approximately 266 feet to a new breach in the existing dry non-functional section of the irrigation ditch. Stabilization of the springbrook and the new functioning section of the irrigation ditch will include removal of vegetation and substrate from the ditch and may include the addition of wood, stone, metal or concrete to prevent the ditch from breaching in an undesired location or being filled in by natural earth movement from the uphill side of the ditch. If these stabilizing elements are necessary, they will be designed to be unobtrusive and in keeping with the historic look of the site.

The fence and corral system, including modern infrastructure portions, will be maintained and repaired as needed. Sections where new barbed and smooth wire will be hung would conform to Manual H-1741-1 - BLM Fencing for Wildlife-Friendly Fencing Standards and the Arizona Department of Game and Fish (AGFD) Guidelines for Wildlife Compatible Fencing.

The ranch yard will be re-contoured to remove the buildup of organic matter and soil from various modern projects including the placement of French drains in the 2000s, recent flooding and natural vegetative decay. Re-contouring will take place under the supervision of an archeologist or their designee.

Vegetation

Annually encroaching vegetation will be removed from the walkways, HS, LE (including agricultural fields) and parking areas. Vegetation will also be maintained to provide 1) open space around the ranch house, shed and barn to provide a fire barrier and to mimic the previously open ranch yard, 2) a historically similar an open vista of the adjacent Pigeon and Tassi Wash, and 3) open preexisting roads for the passage of service vehicles and the use to roads as visitor trails. Vegetation, including invasive and non-native species, will be treated by a variety of methods including mechanical methods, manual manipulation and application of pesticides. Only EPA approved pesticides will be used according to label to control unwanted vegetation. Woody debris will be hauled to Pigeon Wash and chipped or burned. Non-woody debris such as

leaves will either be added to the woody debris pile or used as mulch to stabilize existing vegetation or LE. Vegetation treatment in the riparian areas will be guided by the requirements of the aquatic organisms found at the particular location.

Vegetation that has been determined to be a LE will be pruned by a certified arborist or under the guidance of a technical expert during the dormant season. Dead or dying LE will be identified by a certified arborist and replaced with like vegetation from seedlings, suckers or rooted cuttings found onsite unless a close match can be found from a similar spring-system area.

Modern Infrastructure

Modern Infrastructure is defined as additions to the historic landscape for visitor use or interpretation, scientific monitoring and site stabilization and protection. Some modern infrastructure may be added to the site to help stabilize the HS and LE. Any modifications to the original HS or LE will be documented and marked if appropriate (such as stamping new timbers). Short footbridges may be placed to keep visitors from walking in the springbrook or muddy areas. The current French drain system will be inspected, cleaned out and augmented to increase the diversion of water away from the ranch house, shed, and barn.

Modifications and additions will be made to the existing visitor-related infrastructure. Wayside exhibits will meet accessibility standards. . A vault toilet will be installed near the wayside on the bluff across Pigeon Wash in the footprint of the closed airstrip. The parking area will be expanded to meet the CLR recommendations once hazards have been diminished or removed. Contouring of Pigeon Wash may occur to shift the active flood channel away from the site. This will be done in consultation with the Army Corps of Engineers and a technical expert. The wooden worm fence will be replaced with a different fence design more in keeping with the historic character of the site. The fence will incorporate a locked service vehicle gate similar to the gates in the barbed wire section and a visitor pass through gate that will allow foot traffic but exclude motorized vehicles. Two stiles will provide access for visitors through barbed wire sections of the fence.

Ongoing monitoring at the site will continue. In addition to the ongoing monitoring, surveys will occur within 1 year prior to any NPS or BLM controlled changes in water flow, vegetation treatment or removal, or earthmoving for relict leopard frog and Grand Wash springsnail in wetted areas. To monitor subsurface spring activity up to 10 shallow wells will be placed. A brook size weir/flume and vault to house a datalogger to gauge water flow rates will be placed in the stream channel downstream from the main spring heads. A scientific monitoring station will be placed on an embankment near open/flowing water to monitor bats attracted to the water source. The proposed instrumentation may include: anemometer, temperature, relative humidity, barometer, precipitation gauge, UV solar intensity, evaporation pans, soundscape/wildlife acoustic equipment, and air quality monitoring equipment for ozone, nitrate/sulfate deposition, haze, and air particulates.

The existing exclosure installed by Lake Mead National Recreation Area (LAKE) in 1993 will be temporarily retained until a decision could be made regarding its scientific need.

Numerous design features and conservation measures will be followed to minimize any potential adverse impacts to the project areas and its components.

RATIONALE FOR DECISION

The Selected Alternative meets the purpose and need of the project while minimizing impacts to Monument resources. It provides a plan that will align with the recommendations found in the CLR while maintaining viable habitat for riparian and aquatic species and suitable visitor use. The Selected Alternative provides a clear, comprehensive plan in which site management and treatment will be considered on a cultural landscape level instead of on the needs of a particular resource without long term clear understanding and consideration of other resources, as would occur under the No Action Alternative.

The Selected Alternative preserves the historic setting while providing historically compatible protections for natural and cultural resources and visitor use and safety and meets the requirements outlined in the PARA General Management Plan/Resource Management Plan as well as the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes.

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

During preliminary analysis of the Selected Alternative in the EA, the Selected Alternative was determined to potentially impact cultural resources (archeological resources, historic structures and cultural landscapes), recreational use of the cultural landscape, soil density and chemistry, wetland, riparian and upland vegetation, appearance of the project area, and wildlife (threatened and endangered species, special status species and migratory birds). Upon detailed analysis, the Selected Alternative was found to have no significant adverse effects, as defined in 40 CFR §1508.27. The detailed analysis of the potential impacts can be found in Chapters 3 and 4 of the EA. The following significance criteria were examined.

Impacts that may be both beneficial and adverse

No major adverse impacts were identified that will require analysis in an environmental impact statement. Minor or negligible adverse impacts were identified for

- a. Historic structures: repair of the French drain
- b. Archeological resources: installation of spring monitoring wells
- c. Soil density: repair and extension of springbrook, and recontouring of ranch yard
- d. Soil compaction: recontouring of ranch yard

- e. Vegetation (wetland, riparian and upland): clearing and trimming vegetation to better give the appropriate historic appearance to the cultural landscape
- f. Appearance of the project area: changes to facilities near ranch house, installation of vault toilet
- g. Wildlife (including threatened and endangered species, special status species and migratory birds): temporary displacement of wildlife during maintenance/construction activities

In each case, the minor or negligible adverse impacts are generally of a transitory nature and have design features in place to minimize any significant adverse impact. For resources a, e, f and g, a beneficial impact will occur upon completion of each activity that may have a non-significant adverse impact.

Degree of effect on public health or safety

The Selected Alternative will improve the safety of visitors. The installation of materials to stabilize structures and wire mesh to limit access to a potentially unsafe building will decrease potential injury associated with the historic structures. Temporary footbridges, repairs to French drains, removal of vegetation from historic roads (now trails) and maintenance of trees will decrease exposure to the risks associated with falling limbs from historic trees and slips, trips and falls.

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

Tassi Ranch is a cultural landscape in threatened Mojave desert tortoise critical habitat. The Selected Alternative follows the recommendations in the Tassi Ranch Cultural Landscape Report and has provisions to protect Mojave desert tortoise habitat as well as the ecological function of the springs within the cultural landscape. New installations and modification to existing historic structures are compatible with the existing cultural landscape. The Arizona Stat Historic Preservation Office has concurred with the Monument's finding that the Selected Alternative will have No Adverse Effect on the cultural landscape.

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

No controversial effects on the quality of the human environment were identified.

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

There will be no uncertain effects or unique or unknown risks in implementing the Selected Alternative. All aspects of this project follow known procedures and guidance from subject matter specialists.

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

The Selected Alternative neither establishes a precedent for future actions with significant effects, nor represents a decision in principle about a future consideration.

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

The impacts of the Selected Alternative on each impact topic were identified in the EA. Cumulative impacts to each resource were also identified and none will have cumulatively significant effects.

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

The Arizona State Historic Preservation Office concurred with the Monument's findings that the Selected Alternative will have No Adverse Effect on the cultural landscape.

Degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973

The project area is in threatened Mojave desert tortoise habitat and may be visited by endangered California condor. Design features and conservation measures are incorporated into the Selected Alternative to avoid any adverse impact to those species or habitat.

Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment

The Selected Alternative does not violate any federal state or local law, or requirements for protection of the environment.

PUBLIC INVOLVEMENT AND AGENCY CONSULTATION

The Monument conducted both internal review of the draft EA with appropriate Monument, NPS and BLM staff, and public scoping regarding the proposed action. Internal and external scoping was utilized to refine the project purpose and need, identify issues and impact topics and develop reasonable and feasible alternative actions.

Scoping

Internal scoping included a formal meeting with and analysis from the following Monument-affiliated subject matter experts: Ecologist, Tribal Liaison, Rangeland Conservation Specialist, Planning and Environmental Coordinator, Physical Scientist, Archeologist, BLM Monument Manager, Outdoor Recreation Planner, NPS Monument Superintendent, and Wildlife Biologist.

Members of the public were invited to submit public scoping comments during the public scoping period from April 10 to May 9, 2018. Comments were submitted by email and through the NPS PEPC system.

The Monument provided information about the proposed action through the following means:

- 1. A Notice of Public Scoping sent via email or US mail to a list of interested parties maintained for the BLM Arizona Strip District NEPA process (approximately 105 individuals or entities)
- 2. A Notice of Public Scoping, site map, project summary and landscape component matrix was posted on PEPC
- 3. A Notice of Public Scoping, site map, project summary and landscape component matrix was posted on BLM ePlanning as all past EAs specific to the Monument have been posted on ePlanning.

Five scoping letters were received from a state agency, non-profit organizations and individual members of the public. Comment letters submitted during the public scoping period expressed concern about natural restoration, rare species monitoring and fence construction and layout.

For a summary of public scoping comments and how they were incorporated into the EA, refer to Chapter 5, Section 5.2 of the EA, "Summary of Public Participation". Based on scoping comments received, and federal laws, regulations, and executive orders, the Monument determined that an Environmental Assessment was the appropriate NEPA pathway for this proposal.

Review of Environmental Assessment

Internal review prior to release of the EA for public review was conducted by Monument affiliated staff including the Ecologist, Planning and Environmental Coordinator, BLM Monument Manager and NPS Monument Superintendent, the NPS Pacific West Region Historical Architect, Cultural Landscapes Program Manager, Regional Section 106 Coordinator, Regional Environmental Coordinator and Regional Cultural Anthropologist/American Indian Liaison, and the Park Cultural Landscapes Program WASO Program Manager.

Members of the public were invited to submit comment during the public review period from November 30 to December 31, 2018. The public comment period was extended upon request from the public from February 2 to February 11, 2019.

The Monument provided information about the EA and the public comment period through the following means:

- 1. A Notice of Public Comment Period was sent via email or US mail to a list of interested parties maintained for the BLM Arizona Strip District NEPA process (approximately 143 individuals or entities)
- 2. An EA was posted and made available to receive comments on PEPC

3. A Notice of Public Comment Period was posted on BLM ePlanning.

In addition to the methods above, a notice about the public comment period extension was posted on the Monument NPS website.

Several comments were submitted via email, and four letters were received from a state agency, a non-profit organization and two individual member of the public. Comments included requests for further clarification of aspects of the proposed action and recommendations for methods of aspects of the proposed action related to Grand Wash springnsail and relict leopard frog. For a discussion of public review comments, see Appendix A.

Tribal Consultation

Tribal consultation began with consultation with the BLM Arizona Strip District Tribal Liaison Officer (TLO), whose duties include the NPS portions of Grand Canyon-Parashant National Monument, in March 2018. The TLO felt at that time that this project would not "limit access to any ceremonial use or to any Indian sacred sites on federal lands by American Indian tribes who have interest on the AZ strip". Formal tribal consultation was initiated by certified letter dated November 7, 2018 to specifically address the question of presence of historic properties with religious or other cultural significance under 36 CFR Part 800.4(c)(2). Letters were sent to 24 representative of tribes, bands and chapters with known affiliation to the Arizona Strip District. Comments were received from 1 tribe, deferring their response to SHPO's determination of level of effect of the Selected Alternative.

National Historic Preservation Act Section 106 Review

The Tassi Ranch cultural landscape has been found to be eligible for listing in the National Register of Historic Places. As a result, the NPS, because it is a federal agency carrying out a federal undertaking that may affect this historic property, is required to fulfill the provisions of Section 106 of the National Historic Preservation Act and its implementing regulations at 36 CFR 800.

Accordingly, the Monument entered into consultation with the Arizona State Historic Preservation Officer (SHPO) for the purpose of determining the level of effect that the proposed undertaking would have upon the historic property, and to consider ways to avoid, minimize or mitigate any adverse effects that may be found. Involvement of the public in this review process was carried out through the NEPA review process. Informal discussion with the SHPO regarding the project was initiated in early 2018. Consultation was initiated by the Monument by letter dated December 7, 2018 and was completed by the SHPO by emailed letter on February 8, 2019 with a signed concurrence with the Monument determination that the "undertaking would cause an effect but that it would not be adverse", a NAE, or No Adverse Effect.

CONCLUSION

Based on the information contained in the Tassi Ranch Site Management Plan Environmental Assessment and the capability of mitigation and conservation measures to avoid or minimize potential impacts, as well as due consideration of scoping and EA review comments received from affected agencies and the public, it is the determination of the NPS that the Selected Alternative is not a major federal action that will significantly affect the quality of the human environment. Therefore, requirements of NEPA have been satisfied and preparation of an Environmental Impact Statement is not required. Implementation of the approved Site Management Plan will be undertaken as soon as practicable.

RECOMMENDED:

FEB 1 5 2019

Chad Corey, Superintendent

Grand Canyon-Parashant National Monument

National Park Service

APPROVED:

Stan Austin, Regional Director

Pacific West Region

National Park Service

FEB 2 0 2019

APPENDIX A

ENVIRONMENTAL ASSESSMENT PUBLIC REVIEW COMMENTS AND RESPONSES

Substantive and other public comments are organized by issue in the table. Comments in common to several groups or individuals were combined into one comment, where applicable, and subsequently addressed in one response. All comments were considered in the NPS decision-making process.

Comment	Comment	NPS Response
Issue		
Amphibian Detection and Preservation	When are Relict Leopard Frog and any other amphibian species' tadpoles present in the springbrook habitat? Please clarify this sentence to indicate the entire time period each year when tadpoles may be present and needing protection.	Please see modification to Section 2.2.1 subsection Vegetation. Additionally, amphibian tadpoles may be present in the springbrook at any time during the year.
Design Feature	in addition to the power washing requirement, any equipment that will operate within wetted habitats should be sprayed down with an antifungal (Virkon is recommended) to avoid spreading chytrid fungus.	Please see added Design Feature in Section 2.2.1, starting "Any equipment used in wetted areas"
Exclosure	I recommend that the EA provide more information on what has been learned from this exclosure thus far, and what continuing benefit it may provide going forward EA should provide more relevant information as this exclosure appears to be a SMP component.	This information, while relevant to the decision-making process regarding its removal, is outside the scope of the EA. See modification to Section 2.2.1 subsection <i>Scientific Monitoring</i> for a more thorough physical description of the exclosure.

Comment Issue	Comment	NPS Response
Fencing	What is the maintenance plan for the fence and is there flexibility in any modifications necessary to prevent feral animals from breaching the fence?	Please see Section 2.2.1 subsections Fence and Corral System and Visitor Infrastructure for information regarding the fence. Additionally, please see the table in Appendix B, specifically assets Ranch Core Protection Fence (Historic) and Ranch Perimeter Fence (Historic) for detailed discussion of inspection and fence design requirements. All fence modifications would need to remain compatible with the historic character of the ranch, Manual H-1741-1 - BLM Fencing for Wildlife-Friendly Fencing Standards, and the Arizona Department of Game and Fish (AGFD) Guidelines for Wildlife Compatible Fencing. Inspection and repair of the fence would be annual.
Invasive Plant Treatment	Use and application of pesticides, including fungicides and herbicides, should be minimized so as not to contaminate the springs and to ensure better protection of native species. We ask that you utilize mechanical removal to the maximum degree possible and to avoid using highly toxic pesticides.	Noted. In addition, per Section 2.2.1 subsection <u>Vegetation</u> , any pesticides used will be EPA approved and applied according to the label. This includes application guidelines related to water contamination and avoidance of injury to non-target species.
Recreation	The Department asks that the Monument clarify that existing recreational uses will continue to be allowed within the EA.	The EA does not analyze closing the area to legal use. Hunting, wildlife viewing and off-trail exploring would be expected to persist. The EA does include new access configurations (gates) to increase accessibility and address public safety concerns. See Section 2.2.1 subsections Historic Structures and Landscape Elements and Modern Infrastructure.

Comment Issue	Comment	NPS Response
Relict Leopard Frog Detection and Preservation	The Department. recommends that the Monument perform surveys for frogs, tadpoles, and egg masses prior to any vegetation treatment or removal, regardless of timing of non-emergency vegetation treatments.	Please see modification to Section 2.2.1 subsection <u>Vegetation</u> .
Relict Leopard Frog Detection and Preservation	The Monument should perform surveys in any of the low-lying patches of yerba mansa (including areas away from the channel), when vegetation removal or earth moving will occur in this habitat.	Please see modification to Design Features in Section 2.2.1 starting "Salvage and within springbrook relocation". All earth moving activities are assumed in this EA to include vegetation removal.
Relict Leopard Frog Detection and Preservation	During frog surveys within the project area, if any frogs, tadpoles, or egg masses are found, they should be moved to an undisturbed portion of the channel, outside of the treatment area.	Please see Design Features in Section 2.2.1. "[U]naffected area" in the fourth design feature includes the channel.
Relict Leopard Frog Detection and Preservation	The Department recommends that the Monument ensure that the channel extension has features that will provide suitable cover for frogs such as bunch grasses, woody vegetation, and woody debris.	While not explicitly stated in the EA, it is anticipated the channel extension will naturally develop vegetation that will be suitable cover for relict leopard frogs while maintaining its historic character.
Relict Leopard Frog Detection and Preservation	The Department suggests that the Monument coordinate with [the appropriate relict leopard frog researcher] prior to doing any of the vegetation removal or earth moving activities along the channel and spring box; so that [they] can plan [their] monitoring at the site accordingly.	Please see added Design Feature in Section 2.2.1 starting "Researchers holding valid research permits"
Springsnail Monitoring	The Department extends its commitment in assisting the Monument with future springsnail surveys ahead of any planned vegetation removal work.	The NPS appreciates the commitment and will continue to coordinate and work with AGFD.