

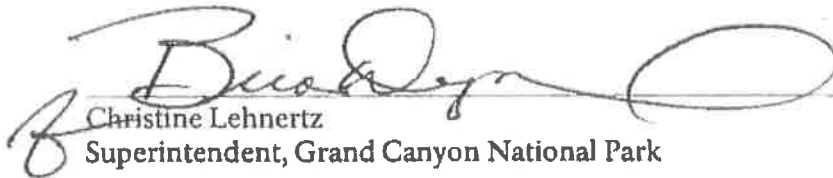


National Park Service
U.S. Department of the Interior

Grand Canyon National Park
Arizona

FINDING OF NO SIGNIFICANT IMPACT
Desert View Inter-tribal Cultural Heritage Site Plan
Environmental Assessment

Recommended:


Christine Lehnertz
Superintendent, Grand Canyon National Park

3/4/19
Date

Approved:


Kate Hammond
Acting Regional Director, Intermountain Region, National Park Service

3/12/2019
Date

INTRODUCTION

In compliance with the National Environmental Policy Act (NEPA), the National Park Service (NPS) prepared an Environmental Assessment (EA) to examine alternative actions and environmental impacts associated with the proposed project to create an Inter-tribal Cultural Heritage Site at the Desert View visitor services area of Grand Canyon National Park (park). The project is needed to increase opportunities for authentic first-voice interpretation, improve visitor orientation, and enhance the overall visitor experience at the site.

The statements and conclusions reached in this Finding of No Significant Impact (FONSI) are based on documentation and analysis provided in the EA and associated decision file. When necessary, relevant sections of the EA are incorporated by reference below.

SELECTED ALTERNATIVE AND RATIONALE FOR THE DECISION

Based on the analysis presented in the EA, the NPS selected Alternative B without modification.

Under this selected alternative, the NPS will partner with associated tribes and park partners to create authentic, first-voice tribal interpretation and expand opportunities for cultural and educational programs including demonstrations, exhibits, and personal interactions with tribal representatives and artisans. In support of these programs, the NPS will modify existing infrastructure, rehabilitate and reuse historic buildings, and complete some new construction within the existing developed footprint at Desert View. These site modifications include the following elements. For more details, please see the description of Alternative B on pages 9-18 of the EA.

Transportation

The existing parking lots will be restriped and islands reconfigured to accommodate passenger vehicle parking in both the east and west parking lots, and recreational vehicle (RV) and commercial bus parking will be relocated to the east parking lot. An additional bus stop for passenger drop-off/pick-up will be installed just a few hundred feet south of the existing shuttle bus turnaround in a currently disturbed area. Traffic lanes will be reconfigured to create space for a new site orientation plaza, provide access to and through parking lots, and provide more direct access to the service station. Except for new connections between the entry, east parking lot, and through to the service station, all modifications will occur within the developed footprint of the existing parking lots and will result in increased parking capacity and a net loss of pavement.

Site Circulation

Paved trails that are extraneous and confusing for visitor site orientation, such as the existing central paved trail, will be removed and those areas revegetated. Underutilized and ineffective shade shelters will also be removed. All paved trails will be surveyed and realigned to comply with the Architectural Barriers Act (ABA). The entrance to the Desert View Watchtower will be restored to flagstone. An unpaved Civilian Conservation Core (CCC)-era historic trail will be rehabilitated, and an existing unpaved social trail between the amphitheater and Desert View Watchtower will be formalized by leveling the surface and removing significant trip hazards. Wayfinding signs will be redesigned, and some new signage and stone trail markers will be added.

Visitor Services

A new site orientation plaza, including restrooms, picnic areas, and a pedestrian-accessible entrance sign, will be constructed in a disturbed footprint between the existing parking lots and near the location of the former visitor center. Additional picnic areas will be distributed around the existing parking lots, and existing visitor use features, such as metal benches, will be replaced with stone benches throughout the site. The disturbed area just south of the Desert View Watchtower will be minimally enhanced to formalize an outdoor cultural demonstration space. A second cultural demonstration space will be constructed adjacent to the Old Bookstore and will include, among other things, amenities to accommodate food heritage demonstrations. Although the amphitheater will maintain its existing capacity, stone seating will replace existing wood benches and this area will be graded, leveled, and improved to comply with the Architectural Barriers Act (ABA).

A future cultural heritage center building to house exhibit and event space will also be considered for the site through further planning and consultation. Potential locations for a cultural heritage center building include a new building in the vicinity of the existing bus parking lot, as an expansion to the Old Bookstore, or integrated within the existing Trading Post.

Buildings

Two historic buildings, the Old Bookstore and Search and Rescue/Fire Cache, will be rehabilitated for use in support of the cultural demonstration program expansion. One non-historic building, the former Visitor Center, will be relocated and repurposed for use in the housing/administration area of the site. Other existing, non-historic buildings could be reconfigured inside to support programming and park staff needs, such as storage.

Other Infrastructure

Housing capacity will be increased on-site through the rehabilitation of existing RV pads and/or the construction of a new eight-plex apartment unit. Water, wastewater, and utility infrastructure will also be upgraded to support the site, including expanding the capacity of the existing wastewater treatment plant and installing an additional water storage tank.

Construction

On-site construction, including utility improvements, will occur over the course of three to five years. However, the development of the cultural heritage center building will likely extend beyond this five year timeline depending on how the site evolves, how long it takes to identify programming needs, and the location pursued in the future.

Rationale

Alternative B was selected because the collection of proposal elements best meets the project purpose to create authentic, first-voice tribal interpretation, to improve visitor orientation, and to enhance the visitor experience. The collective benefit to implementing these elements will also help to restore the Desert View Watchtower's original design intent, which was to introduce visitors to the American Indian cultures of the region. Alternative B also best meets the project objectives (see pages 1-2 of the EA).

MITIGATION MEASURES

Refer to Appendix A for a complete list of all mitigation measures that will be implemented for the selected alternative.

PUBLIC INVOLVEMENT

Public scoping for the EA was initiated on February 5, 2018 and extended for 30 days through March 6, 2018. During this time, the NPS received a total of 18 responses in the form of comments submitted on the NPS Planning, Environment, and Public Comment website and an additional two comments that were accepted during public meetings. The NPS also made the EA available for a 30-day public review, beginning October 25, 2018 and extending through November 24, 2018. In response to the EA, two written correspondences were received from the public and an additional five letters were received from tribes which contained a number of comments that warranted response. While a full response to comments is included in the decision file for the EA, the primary concerns are summarized and responded to in Appendix B.

AGENCY CONSULTATION

State Historic Preservation Office

In compliance with section 106 of the National Historic Preservation Act (36 CFR Part 800) (NHPA), the NPS initiated consultation with the Arizona State Historic Preservation Officer (SHPO) in February 2018. A second letter with the finding of effect was sent October 1, 2018, and updated October 22, 2018, to reflect a finding of no adverse effect to historic properties. In a letter dated November 8, 2018, the SHPO determined that it was “premature to comment on the finding of project effect”, and the NPS agreed on November 15, 2018 that “the effect on historic properties [as defined in section 106 of NHPA] cannot be fully determined because the site plan is in the conceptual [phase] and implementation would be phased over the next five to ten years”.

Because all site plans have been conceptual in nature, a programmatic agreement (PA) was prepared that records the terms and conditions agreed upon to continue Section 106 consultation for planning and activities within the scope of the Inter-tribal Cultural Heritage Site Plan / EA. In accordance with the PA, the NPS will seek to avoid adverse effects to historic properties with input from consulting parties. The NPS notified the Advisory Council on Historic Preservation (ACHP) of the NPS intent to prepare a PA on November 16, 2018, with receipt acknowledged by the ACHP on November 19, 2018. The ACHP did not respond within 15 days of receipt that it would participate; therefore the ACHP did not participate in the consultation. The NPS sent a final, signed, PA to the SHPO on December 20, 2018; the SHPO signed and returned the PA to the park on February 1, 2019. The PA was filed with the ACHP, as required, on February 25, 2019.

Tribes

Grand Canyon National Park’s 11 traditionally associated tribes—including the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab Band of Paiute Indians, the Las Vegas Tribe of Paiute Indians, the Moapa Band of Paiute Indians, the Navajo Nation, the Paiute Indian Tribe of Utah, the Pueblo of Zuni, the San Juan Southern Paiute Tribe, and the Yavapai-Apache Nation—have been involved in the development of the Desert View Inter-tribal Cultural Heritage Site Plan since its inception in 2015 through quarterly meetings with the park’s Inter-

tribal Working Group. Formal consultation, in compliance with NHPA, was initiated with the tribes in a letter signed February 5, 2018. The NPS also offered and accepted several invitations during the summer of 2018 to meet with tribal councils to discuss the alternatives considered within the EA. In an email dated September 17, 2018, the NPS consulted with tribes on the EA alternatives and the initial finding of effect, and in a letter dated November 14, 2018, the NPS consulted with tribes on the EA, finding of effect, and draft PA which also provided tribes the opportunity to be Invited Signatories to the PA. The park then followed up on December 4, 2018 through a series of phone calls to tribal representatives from each tribe and discussed the Section 106 consultation as well as the PA.

The NPS received five formal letters of response: from the Yavapai-Apache Nation dated September 19, 2018; from the Navajo Nation dated November 13, 2019; from the Havasupai Tribal Council dated December 10, 2018; from the Hopi Tribe dated December 31, 2018; and from the San Juan Southern Paiute Tribe dated January 18, 2019. All letters voiced overall support of the proposed project at Desert View. As of March 4, 2019, the San Juan Southern Paiute Tribe signed the draft PA, and the Hopi Tribe signed the final PA. No other tribal comments on the EA, Section 106 consultation, and PA have been received. The NPS will continue to consult with tribes throughout project design and implementation.

U.S. Fish and Wildlife Service

The NPS initially invited the U.S Fish and Wildlife Service (USFWS) to provide comment on the plan via email on February 8, 2018. In compliance with section 7 of the Endangered Species Act of 1973 as amended (16 U.S.C. 1531 et seq), the NPS initiated informal consultation with the USFWS on October 15, 2018, requesting their review and concurrence on the determination that the proposed action may affect, but is not likely to adversely affect the California condor (*Gymnogyps californianus*; threatened) and the Mexican spotted owl (*Stix occidentalis lucida*; threatened). The action would have no effect on critical habitat or other federally-listed species. The USFWS concurred with the NPS's findings in a letter dated November 27, 2018.

FINDING OF NO SIGNIFICANT IMPACT

The Council on Environmental Quality regulations at 40 Code of Federal Regulations (CFR) Section 1508.27 identify ten criteria for determining whether the selected alternative will have a significant effect on the human environment. The NPS reviewed each criterion given the environmental impacts described in the EA and determined there will be no significant direct, indirect, or cumulative impacts under any of the criteria.

As described in Chapter 1 of the EA, the following resource topics were carried forward for detailed analysis: visitor experience (interpretive and educational opportunities) and cultural resources (Desert View Watchtower National Historic Landmark, Desert View Watchtower Historic District, and Other Cultural Resources). The potential for significant adverse impacts on these resources has been analyzed, taking into account context and the relevant consideration from 40 CFR 1508.27(b), as follows:

- Impacts that may be both beneficial and adverse. A significant impact may exist even if the federal agency believes that on balance the effect will be beneficial;
- 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;

- The degree to which the potential impacts are highly uncertain or involve unique or unknown risks;
- The 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;
- Whether the action is related to other actions with individually insignificant but cumulatively significant impacts;

Taking these considerations into account, as described below, the NPS has determined there will be no significant adverse direct, indirect, or cumulative impacts for any of the resources.

Visitor Experience – Interpretive and Educational Opportunities

The selected alternative will have multiple, long-term benefits on visitor experiences as the site will begin to function as a more cohesive, intuitive place to visit and visitors will have increased access to a range of educational and cultural experiences that arise from having direct, personal conversations and learning interactions with members of the Grand Canyon's traditionally associated tribes. For example, the adaptive reuse of buildings and creation of cultural demonstration spaces will increase the number and diversity of educational experiences for visitors, and the formalization of the east and west unpaved rim trails increases the variety of recreational experiences for visitors, allowing those who so desire to access views of the Canyon that are away from the primary sites and less crowded. Other beneficial impacts anticipated include improved access to parking for privately owned vehicles (POVs), increased parking capacity (especially for POVs), clear and improved access to restrooms, improved orientation and wayfinding around the site, and improved ABA accessibility to the amphitheater, Watchtower, and along the pathways.

The NPS anticipates some short-term adverse impacts to the visitor experience during construction. These impacts will be directly associated with on-site construction noise, possible detours, and intermittent and temporary (i.e., for no more than several weeks) closures over the course of 3-5 years as the NPS implements the aforementioned visitor improvements. These activities could disrupt individual visitors' experiences, but visitors at Desert View for the sunset will likely be spared the noise impacts associated with active construction as these negative impacts will be limited to day time activities only. All of the impacts described above will cease upon the completion of construction activities. Because visitors, regardless of duration and timing of their visit, will still be able to access most facilities and services on-site as currently provided, these impacts associated with implementation are unlikely to impact the overall visitor experience or visitors' access to interpretive and educational opportunities.

When the effects of the proposed action are combined with other past, present, and reasonably foreseeable future impacts, the total cumulative impact on the visitor experience at Desert View will be beneficial and long-term (in perpetuity) as interpretive and educational opportunities will be expanded, visitor services will be enhanced, crowding will be reduced, and visitor orientation will be clarified.

Cultural Resources – Desert View Watchtower National Historic Landmark, Desert View Watchtower Historic District, and Other Cultural Resources

Impacts to the NHL and Historic District

Character of NHL and Historic District

The selected alternative will have long-term beneficial impacts on the character of the Desert View Watchtower National Historic Landmark (NHL) and Desert View Watchtower Historic District by removing some of the modern features that are not compatible with the NHL and historic district, re-utilizing—to a greater degree—some of the historic buildings within these areas, reestablishing some views to and from the Watchtower, revegetating denuded areas within the NHL, rehabilitating the flagstone entrance to the Watchtower, and ultimately increasing tribal presence on-site, as consistent with Mary Elizabeth Jane Colter’s vision of communicating the ancestral Puebloan architecture and cultures of American Indians of the southwest to visitors at Desert View.

The character of the NHL and historic district will be impacted by the addition of several features within, and south of, these districts. For example, the viewsheds and circulation on-site will be modified, to varying degrees, by installation of an orientation plaza and waysides, restrooms, and an entry sign; improvements to the amphitheater; the addition of threshold markers; the possible addition of paved ABA trails; the formalization of cultural demonstration spaces; the removal and revegetation of trails that are within the former alignment of East Rim Drive; and the potential location of a cultural heritage center building in the vicinity of the former visitor center.

While the features listed above could all be, at least partially, visible in the foreground from the NHL and historic district, the character-defining views from the Watchtower toward the Grand Canyon, Painted Desert, and San Francisco Peaks will remain, and views toward the Watchtower will be somewhat reestablished from the removal of non-contributing features. Similarly, any changes in circulation will not result in measureable impacts to the integrity of the NHL nor historic district as the circulation features that will be affected have been previously modified. And finally, through the removal of features that are not compatible with either the NHL or historic district and through appropriate design, massing, and scale of the new infrastructure, the historic character of the NHL and historic district will be retained.

Buildings and Other Features within the NHL and/or Historic District

The selected alternative will have beneficial impacts on a historic CCC trail by rehabilitating the physical, character-defining, features of this trail such as the stone lining and drainage features.

In addition, no direct modifications will be made to the following historic buildings: the Desert View Watchtower, the Ruin, Store Room, Caretaker’s Residence, Shed, or the Service Station. The only potential direct impacts to buildings that are contributing to the historic district include potential interior modification to the Search and Rescue/Fire Cache and Trading Post and both interior and exterior modifications to the Old Bookstore. As the interiors of all three buildings have been altered previously, continued interior modifications of these buildings, especially as they will be completed in adherence to the Secretary of the Interior’s Standards for the Treatment of Historic Properties, are not expected to adversely affect these historic

properties nor alter any character defining features. The external modifications to the Old Bookstore, such as replacement of the membrane roof, are also not anticipated to alter any character defining features of this building as the roof will be replaced in kind. These modifications, particularly related to the roof, will result in a long-term beneficial impact to the Old Bookstore by addressing deferred and necessary maintenance and increasing the utilization of this building into the future. However, should the NPS locate the cultural heritage center building as an addition to the Old Bookstore, the selected alternative would alter, if not remove one exterior wall (one quarter of the exterior face) of this historic resource, and could alter the historic setting and feeling of the building by adding a feature adjacent to the structure that would change the mass, scale, and appearance of the building as visitors approach the area from the south. The addition would also partially serve the purpose of adaptive reuse for this building which could serve to protect the structure in the long-term (in perpetuity) as the building would be more likely to receive ongoing maintenance and protection.

The NPS believes that by implementing appropriate mitigations, such as adhering to the Secretary of the Interior's Standards for the Treatment of Historic Properties—Guidelines for Preserving and Rehabilitating Historic Buildings and Guidelines for Preserving and Rehabilitating Cultural Landscapes for all aspects of the selected alternative, adverse effects to cultural resources from the implementation of the selected alternative can be avoided.

Other Cultural Resources

The selected alternative will remove the vehicular barrier between the eastern parking lot and access road for the Service Station and shuttle turn. As these features were designed post 2000 and are not original to the site, modifying the entrance to the Service Station will not alter the character defining features of this building. Therefore, the NPS does not anticipate that this will impact the building or the building's integrity as a cultural resource.

Summary

Given all of the above impacts to the character, buildings, and other features of the NHL and Historic District and the impacts to other cultural resources, when the effects of this proposal are combined with other past, present, and reasonably foreseeable future impacts, the total cumulative impact on the NHL, historic district, and other cultural resources will continue to be negative. The selected alternative will incrementally reverse some of the past and ongoing negative impacts to the NHL, historic district, and other cultural resources, but it will not fully restore the integrity of the NHL, historic district, and other cultural resources because it will not substantially change the impacts that have already occurred and are ongoing.

CONCLUSION

As described above, the selected alternative does not constitute an action meeting the criteria that normally requires preparation of an environmental impact statement (EIS). The selected alternative will not have a significant effect on the human environment in accordance with Section 102(2)(c) of NEPA. Based on the foregoing, it has been determined that an EIS is not required for this project and, thus, will not be prepared.

Appendix A

Mitigation Measures

The following mitigation measures will be implemented to minimize the degree or severity of adverse impacts to resources.

Air Quality

- If the contractor chooses to locate an asphalt or concrete batch plant within the park, it shall use propane, rather than diesel fuel.
- To reduce entrainment of fine particles from hauling material, sufficient freeboard shall be maintained and loose material loads (aggregate, soils, etc.) shall be tarped if transported across Desert View Drive (South Entrance to Desert View).
- To reduce tailpipe emissions, construction equipment shall not be left idling any longer than is necessary for safety and mechanical reasons.
- To reduce construction dust in the short term, water shall be applied to problem areas. Equipment shall be limited to the fenced project area to minimize soil disturbance and consequent dust generation.
- Landscaping and revegetation will control long-term (i.e., in perpetuity) soil dust production. Mulch and the plants themselves will stabilize the soil and reduce wind speed/shear against the ground surface.

Wildlife and Special Status Species

- Prior to start of work, the Project Leader shall contact Grand Canyon's Wildlife Program Manager concerning the presence/absence of threatened or endangered species utilizing nearby cliffs/canyons and to verify that locations of sensitive wildlife species are adequate distances (as described below) from project site. The park's Wildlife Program Manager shall be contacted a minimum of two weeks prior to project commencement.
- If bats are encountered on buildings during construction, all activity shall immediately cease, staff and personnel shall avoid all interaction with the bat(s) and shall contact Park Dispatch and the park's Wildlife Program Manager for assistance and/or advice in removing them safely.
- Project staff shall comply with the Migratory Bird Treaty Act [16 USC 703]. Any active bird nest shall be left in place and undisturbed until the young hatch and depart.
- Vegetation clearing shall be avoided to the greatest extent possible during the primary nesting season, early April through mid-August. If vegetation clearing must occur within the primary nesting season, surveys for active nests shall be conducted by a qualified biologist. Vegetation clearing within the primary nesting season shall only be allowed after the qualified biologist determines that no nests are present or they are inactive.
- When building designs and landscapes are being considered, reducing impacts to migratory birds shall be factored in to the designs (e.g. window placement and reflectivity, proximity of vegetation to buildings, lighting).
- Dark sky compliant lighting shall be used throughout the site, and consideration shall be made for motion sensors and down-shielding as is feasible and appropriate.

- Wildlife-proof trash cans shall be the receptacles used throughout the area. When designing picnic areas, trash amounts, disposal, and potential of blowing into the canyon shall be evaluated.
- Wildlife shall not be fed or approached.
- Trash receptacles and all dumpsters shall be tightly covered to avoid wildlife access.
- For any projects involving trenching or digging holes, provisions (generally in the form of ramps; with a slope < 45°) shall be made every 20-50' to allow for the escape of animals that may fall into these recesses, and/or they shall be covered in such a way as to prevent animals (vertebrates) from falling into them.
- If using erosion netting, biodegradable matting with a large diameter natural fiber shall be used to prevent entrapment of wildlife.
- Care shall be taken not to disturb any wildlife species (reptiles, migratory birds, raptors, or bats) found nesting, hibernating, estivating, or otherwise living in, or immediately nearby, worksites.

California Condor

- Prior to start of work, the Project Leader shall contact the park's Wildlife Program Manager at to verify that locations of California condor are adequate distances (as described below) from project site. If condor nesting activity is known within 0.5 mile of the project area, then light and heavy construction in the project area shall not be permitted during the typical breeding season: February 1 to September 30. These dates may be modified based on the most current information, in consultation with the park biologist and the USFWS.
- If and when condor(s) occur at a work site, project staff shall immediately cease all activity, avoid interaction with condors, and immediately contact Park Dispatch and the park's Wildlife Program Manager. Work shall not resume until the condor(s) leave(s) on its own or until permitted personnel use approved techniques that result in the individual condor leaving the area.
- The work site shall be cleaned up at the end of each day work is being conducted (i.e. trash disposed of, scrap materials picked up) to minimize the likelihood of condors and other wildlife visiting the project site. Park staff shall complete periodic site visits to the area to ensure adequate clean-up measures are taken.
- Because condors are less active in the morning hours, pilots shall be encouraged to conduct flights prior to 10:00am when possible. Pilots shall minimize aircraft use along the rim and cliffs to the great extent possible.
- If the new cultural heritage center building is constructed to a height above the forest canopy, there may be a need to install condor deterrent devices on the structure. This will be evaluated on a case-by-case basis by the park wildlife biologist.

Mexican Spotted Owl

- Prior to start of work, the Project Leader shall contact the park's Wildlife Program Manager to verify that locations of Mexican Spotted Owl are adequate distances (as described below) from project site. If Mexican spotted owl nesting activity is to be known within 0.5 mile of the project area, light and heavy construction work shall not be permitted during the MSO breeding season of March 1 to August 31.

Vegetation and Soils

- The staging area for a construction office (a trailer), construction equipment, and material storage shall be located in previously disturbed areas near the project site and shall be park-approved. All staging areas shall be returned to pre-construction conditions once construction is complete. Standards for this, and methods for determining when the standards are met, shall be developed in consultation with the park restoration biologist.
- Construction zones shall be fenced with construction tape, snow fencing, or some similar material before any construction activity. The fencing shall define the construction zone and confine activity to the minimum area required for construction. All protection measures shall be clearly stated in the construction specifications, and workers shall be instructed to avoid conducting activities beyond the construction zone as defined by the construction zone fencing.
- Standard erosion control measures such as silt fences, sand bags, or equivalent control methods shall be used to minimize any potential soil erosion.
- Tree and plant protection measures shall be installed on area where impacts are possible including fencing, tie-backs, and trunk guards. Tree root protection zones shall be established within construction zones as necessary. Trunk protection shall be installed in areas where mechanized equipment is being used.
- Park pruning guidelines shall be followed at all times, including trees whose roots must be pruned due to excavations. Tree root zones shall remain intact and be protected from disturbance to the greatest extent possible. Branches that must be trimmed shall be done so in a manner that reduces the risk of introduction of diseases to the trees.
- Silt fencing fabric shall be installed and inspected weekly or after every major storm. Accumulated sediments shall be removed when the fabric is estimated to be approximately 75% full and be disposed of in the park's dry dump whenever possible. Silt removal shall be accomplished in such a way as to avoid introduction into any floodplains, wetlands, or other water bodies.
- Although soil side-cast during construction will be susceptible to some erosion, such erosion shall be minimized by placing silt fencing around the excavated soil. Excavated soil may be used in the project or stored in approved areas and used elsewhere in the park at NPS' discretion.
- Any trenching operations will be by rock saw, backhoe, trackhoe, and/or trencher, with excavated material side-cast for storage. After trenching is complete, bedding material shall be placed and compacted in the bottom of the trench and the utility lines installed in the bedding material. Back filling and compaction shall begin immediately after the utility lines are placed into the trench, and the trench surface shall be returned to pre-construction contours. All trenching restoration operations shall follow guidelines approved by park staff. Compacted soils shall be scarified and original contours reestablished.
- A Salvage and Revegetation Plan shall be developed for the project by a landscape architect or other qualified individual, in coordination with the park restoration biologist. Any revegetation efforts shall use site-adapted native species and/or native seed, and park policies regarding revegetation and site restoration shall be incorporated into the plan. The plan will consider, among other things, the use of native species, plant salvage potential, exotic vegetation and noxious weeds, pedestrian barriers, and watering.

- Any fill, rock, or additional topsoil needed shall be obtained from a park-approved source.
- All areas disturbed by construction shall be revegetated using site-adapted native seed and/or plants.
- Watering, monitoring, and follow-up treatment of exotic vegetation post re-vegetation efforts will occur for as long as necessary after construction is completed.
- Inventories for existing populations of exotic vegetation at construction sites, including staging areas, shall occur where prescribed by the park vegetation program manager or their designee and any populations found shall be treated prior to construction activities.
- A restoration biologist shall provide input on tree avoidance at project sites where necessary. A restoration biologist shall also spot-check the work progress for adherence to mitigation measures related to vegetation.
- Where existing vegetation is within a larger construction zone, existing vegetation to remain shall be protected by fencing; for trees, fencing should be placed at a minimum at the drip line or further away from the trunk(s).
- Parking of vehicles shall be limited to existing parking, roads, or the staging area.
- Use of mechanized equipment and heavy machinery shall be limited to the maximum extent possible.
- All construction equipment that is transported to the site from another location, or will leave paved or dirt roads, shall be pressure-washed prior to entering the park and shall be clean of any soil, plant matter, or other materials in order to minimize the potential to import invasive plant seed/material to the site. Vegetation management program staff or the project manager will inspect the vehicles prior to entry into the park.
- All construction equipment shall stay on paved surfaces when surrounding soils are wet to prevent rutting.

Water Quality

- Grand Canyon's "Parkwide Spill Response Plan" shall be utilized by park employees and contractors to prevent soil and water contamination and associated impacts to wildlife. The project leader is responsible for signing and implementing this plan (located on the park's SharePoint site on the Planning and Compliance page).
- A storm water pollution prevention plan (SWPPP) shall be developed by the contractor and approved by the park prior to any ground-disturbing activities. All National Pollutant Discharge Elimination System (NPDES) requirements shall be met.
- Standard erosion control measures such as silt fences, sand bags, or equivalent control methods shall be used to minimize any potential sediment delivery to streams.

Cultural Resources

- The NPS shall adhere to all measures outlined in the *Programmatic Agreement between the National Park Service and the Arizona State Historic Preservation Officer regarding the Desert View Inter-tribal Cultural Heritage Site Environmental Assessment for Grand Canyon National Park, Arizona*.
- Although the NPS would replant all areas where existing pavement and other facilities would be removed, replanting efforts would be minimized within the former historic alignment of Desert View Drive and the former crescent-shaped parking lot to maintain a visual tie to these cultural resources.

- If previously unrecorded and/or buried cultural resources are discovered during any portion of the project, work at that location will immediately cease, and an assessment made by a qualified cultural resource specialist. The NPS will notify SHPO. If American Indian-associated resources are discovered the Tribes would also be notified. Work in that area will not resume until the resources could be identified and documented, and an appropriate mitigation strategy developed and implemented in consultation with SHPO and, as appropriate, Tribes.
- In the unlikely event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during any portion of the project, provisions outlined in the Native American Graves Protection and Repatriation Act (1990) and the park's Memorandum of Agreement Regarding Collections, Inadvertent Discovery, and Intentional Excavation of American Indian Human Remains, Funerary Objects, Sacred Objects, and Objects of Cultural Patrimony at Grand Canyon National Park, Arizona (2007) shall be followed.
- The NPS shall conduct cultural sensitivity training for all contractors. The training will include, but is not limited to, protocol for securing inadvertent discoveries of cultural resources and human remains, if any, and contact information. The NPS will ensure that all contractors and subcontractors are informed of the penalties for illegally collecting artifacts or intentionally damaging archaeological sites or historic properties. Construction activities, including equipment traffic, shall be minimized in the area near sites and shall avoid known archeological resources. Known sites within the project area shall be fenced for avoidance prior to project implementation.

Acoustic Environment

- All construction equipment shall have properly functioning mufflers.
- Construction equipment and associated equipment and vehicles shall not be left idling any longer than is necessary for safety and mechanical reasons.
- Unless otherwise approved by the park, construction activities shall be restricted to 8:00 a.m. to 5:00 p.m. in the summer (May 1- September 30) and 7:00 a.m. to 6:00 p.m. during the rest of the year.

Visual Resources

- Removal of trees shall be minimized to the greatest possible extent. Clearing shall be limited to the immediate construction zone during trenching and other construction. Construction or protection fencing shall surround the established construction zone to minimize damage to vegetation and other features by construction equipment and to define access to the construction site.
- Alignment of new utility corridors will be located where possible through existing open clearings in forested areas and avoid root system-areas. Trench locations shall be placed perpendicular to roadways to create as short a duration of viewing time for visitors to the disturbed area as possible.
- Trenching for underground utilities shall be limited as much as possible to a 10-foot wide fenced construction zone. Clearing of trees and understory shall be feathered to blend with natural openings in the forest canopy.

Visitor Use and Experience

- Traffic in any one direction will not be stopped for more than 15 minutes to minimize disruption to traffic flow.
- Unless otherwise approved by the park, construction activities shall be restricted to 8:00 a.m. to 5:00 p.m. in the summer (May 1- September 30) and 7:00 a.m. to 6:00 p.m. during the rest of the year.
- Contractors shall coordinate with park staff to minimize disruption to normal park activities. Equipment will not be stored along the roadway overnight without prior approval of park staff. Construction workers and supervisors shall be informed about the special sensitivity of park values, regulations, and appropriate housekeeping.

Human Health and Safety

Structural and Wildfire

- Any provided bread oven or roasting pit shall be prohibited from use when the fire danger for the Desert View area is listed as high, very high, or extreme.
- Food heritage demonstration spaces, such as the roasting pit or bread oven, shall remain attended at all times while in use. If open fire is introduced during the course of a demonstration, the area shall not be vacated until the fire is completely out and ashes cold to the touch.
- Some form of barrier (whether temporary (intended for removal within five to 10 years) or permanent) shall be installed to provide separation between visitors and an active oven or burn pit.

Food Preparation

- All cultural demonstrations associated with demonstrating food heritage items shall be limited to selling food products on no more than 14 days/year (per demonstrator) and shall apply and obtain a special use permit from the NPS for the sale of any food on-site. The demonstrator will also need a permit from the state/county and will need to comply with all current NPS food vendor policies (which currently entails submitting a food vendor application to the park at least 30 days in advance of the activity). So long as a cultural food demonstrator's activities are consistent or of similar nature throughout the course of a year, permits could be issued on an annual basis, as opposed to per event.

Errata and Response to Public Comments

ERRATA

These errata are to be attached to the Desert View Inter-tribal Cultural Heritage Site Plan / Environmental Assessment dated October 2018 and are intended to correct or clarify statements in the EA and to address substantive comments received on these documents during the public review period.

EA text to be deleted is shown as ~~red strikeout~~, and revised or new text is shown as *red italicized text*.

Page 9. Alternative B – Preferred Alternative and NPS Proposed Action, Transportation, Parking Lots

Revised Text:

~~This~~ *These modifications could expand the parking space capacity by as much as 23% and would place RV and bus parking closer to the bus turn-around area and away from increased pedestrian traffic in the primary parking areas.*

Page 17. Alternative B – Preferred Alternative and NPS Proposed Action, Other Infrastructure (continued), Wastewater Treatment Plant

Revised Text:

The NPS would also consider installing a ~~trash rackbar screen~~ and flow meter on the north side of the site to reduce trash within the lagoons.

Page 19. Mitigation Measures, Wildlife and Special Status Species

Revised Text:

- Prior to start of work, the Project Leader would contact *Grand Canyon's the Wildlife Program Manager concerning the presence/absence of threatened or endangered species utilizing nearby cliffs/canyons and at GRCNP* to verify that locations of sensitive wildlife species are adequate distances (as described below) from project site. *The park's Wildlife Program Manager would be contacted a minimum of two weeks prior to project commencement.*
- If bats are encountered on buildings during construction, all activity would immediately cease, staff and personnel would avoid all interaction with the bat(s) and would contact Park Dispatch and the park's Wildlife Program Manager for assistance and/or advice in removing them safely.

Page 20. Mitigation Measures, California Condor

Revised Text:

- If condor nesting activity is known within 0.5 mile of the project area, then light and heavy construction in the project area would not be permitted during the *typical breeding*

~~active nesting~~ season: February 1 to September 30. These dates may be modified based on the most current information, in consultation with the park biologist and the USFWS.

- If and when condor(s) occur at a work site, project staff would immediately cease all activity, avoid interaction with condors, and ~~immediately~~ contact Park Dispatch and the park's Wildlife Program Manager. Work would not resume ~~until if and when the condor(s) leave(s) on its own or until techniques are employed by permitted personnel use approved techniques that result which results in the individual condor leaving the area.~~
- *Because condors are less active in the morning hours, pilots would be encouraged to conduct flights prior to 10:00am when possible. Pilots would minimize aircraft use along the rim and cliffs to the great extent possible.*

Page 22. Mitigation Measures, Cultural Resources

Revised Text:

- *The NPS shall adhere to all measures outlined in the Programmatic Agreement between the National Park Service and the Arizona State Historic Preservation Officer regarding the Desert View Inter-tribal Cultural Heritage Site Environmental Assessment for Grand Canyon National Park, Arizona.*
- *If previously unrecorded and/or buried cultural resources are discovered during any portion of the project, work at that location will immediately cease, and an assessment made by a qualified cultural resource specialist. The NPS will notify SHPO. If American Indian-associated resources are discovered the Tribes would also be notified. Work in that area will not resume until the resources could be identified and documented, and an appropriate mitigation strategy developed and implemented in consultation with SHPO and, as appropriate, Tribes. Although there is no surface evidence of archeological resources, should construction unearth previously undiscovered archaeological resources, work shall be stopped in the area of any discovery and the park cultural staff immediately notified. In accordance with the National Historic Preservation Act, park cultural resources staff will determine if further consultation with the State Historic Preservation Officer, the park's traditionally associated tribes, and the Advisory Council on Historic Preservation is necessary. Work cannot continue in the area of discovery until the discovery is evaluated and any necessary mitigations implemented, including consultations.*
- *In the unlikely event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction any portion of the project, provisions outlined in the Native American Graves Protection and Repatriation Act (1990) and the park's Memorandum of Agreement Regarding Collections, Inadvertent Discovery, and Intentional Excavation of American Indian Human Remains, Funerary Objects, Sacred Objects, and Objects of Cultural Patrimony at Grand Canyon National Park, Arizona (2007) shall be followed.*
- *The NPS shall conduct cultural sensitivity training for all contractors. The training will include, but is not limited to, protocol for securing inadvertent discoveries of cultural resources and human remains, if any, and contact information. The NPS will ensure that all contractors and subcontractors are informed of the penalties for illegally collecting artifacts or intentionally damaging archaeological sites or historic properties. Contractors and subcontractors will also be instructed on procedures to follow in case previously unknown archaeological resources are uncovered during construction.*

Construction activities, including equipment traffic, shall be minimized in the area near sites and shall avoid known archeological resources. Known sites within the project area shall be fenced for avoidance prior to project implementation.

Page 22. Mitigation Measures, Acoustic Environment

Revised Text:

- Unless otherwise approved by the park, construction activities shall be restricted to 87:00 a.m. to 56:00 p.m. in the summer (May 1- September 30) and 78:00 a.m. to 65:00 p.m. during the rest of the year.

Page 23. Mitigation Measures, Visitor Use and Experience

Revised Text:

- Unless otherwise approved by the park, construction activities shall be restricted to 87:00 a.m. to 56:00 p.m. *in the summer* (May 1- September 30) and to 78:00 a.m. to 65:00 p.m. during the rest of the year.

Page 26. Visitor Experience, Environmental Consequences, Impacts of Alternative – Preferred Alternative and NPS Proposed Action

Revised Text:

Other beneficial impacts anticipated include improved access to parking for personal vehicles, *increased capacity for parking (up to 23% more parking spaces)*, clear and improved access to restrooms, and improved wayfinding around the site.

Page 27. Visitor Experience, Environmental Consequences, Impacts of Alternative B – Preferred Alternative and NPS Proposed Action

New Text (to insert following first full paragraph):

Depending on the final configuration of the parking lots, visitors may experience some vehicular congestion, particularly near the shuttle bus turnaround, and walking distances may increase by as much as 1/15 of a mile, round-trip, for some visitors. Similarly, parking conflicts between vehicle types could occur under this alternative as there would be a visual connection between the POV and RV/bus parking lot and some drivers may seek to park in spaces designated for other vehicles when spaces for their vehicle type are full. While these impacts may extend the duration of a visitor's time at Desert View, none of these impacts are expected to prevent visitors from visiting amenities on the site. As the NPS proceeds to final designs for the parking lot, modifications could also be made to accommodate handicap parking spaces for RVs even closer to facilities to further minimize impacts. Such modifications would not change the footprint of the parking lots and would not alter the environmental impacts of this proposal.

Page 33. Cultural Resources, Environmental Consequences, Impacts of Alternative B – Preferred Alternative and NPS Proposed Action

Revised Text:

Given 1) the impacts anticipated from the preferred alternative (as discussed below), 2) the scale and scope of the beneficial impacts (as discussed below), and 3) the NPS intent to design all components so that they are compatible with the NHL and historic district and are consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties, the NPS believes the preferred alternative will have both direct and indirect impacts on-site that will retain the integrity of cultural resources at Desert View. No adverse effects to cultural resources are anticipated from the implementation of the proposed action could be avoided.

Page 36. Cultural Resources, Environmental Consequences, Impacts of Alternative B – Preferred Alternative and NPS Proposed Action, first bullet point

Revised Text:

Despite the seemingly disparate impacts of these two options, the NPS does not anticipate either resulting in adverse impacts to the NHL or historic district as this circulation has previously been modified and the existing trails do not retain integrity have previously been modified.

Page 36. Cultural Resources, Environmental Consequences, Impacts of Alternative B – Preferred Alternative and NPS Proposed Action, second bullet point

Revised Text:

However, the NPS intends to avoid any adverse impacts from either development through continued consultation with the SHPO and design would not adversely impact the integrity of the NHL or historic district given adherence to the Secretary of the Interior's Standards for the Treatment of Historic Properties in designing these spaces as well as. Notably, these cultural demonstration spaces align with the design intent of bringing visitors into this landscape to experience native culture and the canyon itself (considered consistent with Colter's vision for Desert View). ... As the NPS would adhere to the Secretary of the Interior's Standards for the Treatment of Historic Properties when designing this outdoor cultural demonstration space, any impacts to historic character of the area would not amount to an adverse effect on the NHL or historic district and these resources would be expected to retain their overall integrity and would remain eligible for listing on the National Register.

Page 39. Cultural Resources, Environmental Consequences, Impacts of Alternative B – Preferred Alternative and NPS Proposed Action, Impacts from Potential Cultural Heritage Center Options on All Cultural Resources, second bullet point

Revised Text:

However, the NPS intends to avoid any adverse impacts to these negative impacts would amount to an adverse effect on the building through continued consultation with the SHPO and as the NPS would adhere to the Secretary of the Interior's Standards for the Treatment of Historic Properties when designing any addition.

Revised Text:

While the addition of features such as signs, picnic areas, an orientation plaza and restrooms, cultural demonstration spaces, and potentially new or realigned trails would add new features to the site and contribute to visual “clutter”, and a potential addition to the Old Bookstore would modify the exterior of the structure, *the NPS would work, through adherence to the Secretary of the Interior’s Standards for the Treatment of Historic Properties and in consultation with the SHPO, to avoid to the greatest extent possible adverse impacts to these direct and indirect negative impacts to the viewshed, circulation, and other cultural resources would not adversely affect the integrity of cultural resources on-site.*

RESPONSE TO PUBLIC COMMENTS

The EA was released for public review from October 25, 2018 to November 24, 2018. The public, media, various agencies, and Grand Canyon’s eleven traditionally associated tribes were notified of the EA’s availability. Three public meetings were held (one on November 7, 2018 in Flagstaff, Arizona and two meetings on November 8, 2018—one via webinar and one in the park) to give the public an opportunity to ask questions or submit comments about the EA.

In response to the EA, two written correspondences were received from the public and an additional five letters were received from tribes. These correspondences contained a number of comments that warranted response. While a full response to comments is included in the decision file for the EA, the primary concerns are summarized and responded to below.

No comments warranted development of an additional alternative or reconsideration of alternatives that were considered but dismissed. Therefore, the alternatives remain as described in the EA and no changes were made in the assessment of environmental consequences other than what is presented in the errata above.

A brief summary of the primary concerns and NPS responses are as follows.

CONCERN: The current configuration of the parking lots and associated facilities expose visitors to safety hazards.

RESPONSE: The configuration of the parking lots and associated facilities that are presented in the Plan / EA are schematic and will be finalized in the coming year. While these schematic designs have been developed by civil engineers and consider risks to human health and safety, the NPS will continue to consider the following as site designs are finalized:

- Separation between privately owned vehicles and recreational vehicle/bus parking;
- Safe pedestrian access from the parking lots to existing and new visitor use infrastructure;
- Pedestrian and vehicular flow through and between the parking lots and the shuttle bus turnaround;
- ABA accessibility for all vehicle types; and
- Emergency response needs.

Traffic standards will continue to be met and pedestrian and vehicular safety taken into account.

CONCERN: The proposed traffic modifications could negatively impact the visitor experience.

RESPONSE: Although the parking lot designs have been drafted and reviewed by civil engineers to meet standards for vehicular needs and orientation (related to item #1 above), wait times may increase for buses near the shuttlebus turnaround, walking distances for passengers and drivers of larger vehicles will increase slightly, and parking conflicts between vehicle types are possible. Parking capacity is also expected to increase by as much as 23 percent. Language has been updated in the EA to consider and respond to these impacts (please see the text change errata above). No additional impacts to visitor experience have been noted in the EA.

CONCERN: A few commenters raised concerns about increasing visitation to Grand Canyon National Park and Desert View, in particular.

RESPONSE: This Plan / EA operates within the visitor use capacities as identified within the Grand Canyon National Park General Management Plan (GMP) (1995). For example, the GMP envisioned the parking space capacity at Desert View to be 450 spaces; this plan would expand the capacity from a current 323 to approximately 400 spaces. While the park continues to monitor visitor use trends at Desert View and throughout the rest of the park, identifying and implementing visitor capacities is outside the scope of this planning effort.

A NON-IMPAIRMENT DETERMINATION

By enacting the NPS Organic Act of 1916 (Organic Act), Congress directed the U.S. Department of the Interior and the National Park Service (NPS) to manage units "to conserve the scenery, natural and historic objects, and wild life in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wild life in such manner and by such means as will leave them unimpaired for the enjoyment of future generations" (54 U.S.C. 100101). NPS *Management Policies 2006*, Section 1.4.4, explains the prohibition on impairment of park resources and values:

"While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them."

An action constitutes impairment when its impacts "harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values" (NPS 2006, Section 1.4.5). To determine impairment, the NPS must evaluate the "particular resources and values that will be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts. An impact on any park resource or value may constitute impairment, but an impact would be more likely to constitute an impairment to the extent that it affects a resource or value whose conservation is:

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;
- key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or
- identified in the park's general management plan or other relevant NPS planning documents as being of significance (NPS 2006, Section 1.4.5).

Fundamental resources and values for Grand Canyon National Park are identified in the enabling legislation for the park and in park's 2017 Foundation Document. Based on a review of these documents, the fundamental resources and values for Grand Canyon National Park come from the park's scenic landscapes, geologic features and processes, biodiversity and natural processes, diverse recreational and experiential opportunities, water resources, and cultural resources and tribal values. Resources that were carried forward for detailed analysis in the EA and are considered necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park; are key to the natural or cultural integrity of the park; and/or are

identified as a goal in relevant NPS planning documents. These resources include: the Desert View Watchtower National Historic Landmark, the Desert View Watchtower Historic District, and other cultural resources present at Desert View. Accordingly, a non-impairment determination is made for these combined cultural resources. Non-impairment determinations are not necessary for human health and safety or visitor use and experience because impairment findings relate back to park resources and values, and these impact topics are not generally considered park resources or values according to the Organic Act.

This non-impairment determination has been prepared for the selected alternative, as described in the Finding of No Significant Impact for the Desert View Inter-tribal Cultural Heritage Site Plan / EA.

Cultural Resources: Desert View Watchtower National Historic Landmark, Desert View Watchtower Historic District, and Other Cultural Resources

The project area contains the Desert View Watchtower National Historic Landmark (NHL) and the Desert View Watchtower Historic District (historic district) as well as all contributing and non-contributing buildings therein. The area also includes the service station (building #1112) which is outside the NHL and historic district but is treated as eligible for National Register listing. The NHL was listed in the National Register in 1987 as part of the M.E.J. Colter Buildings National Historic Landmark District for its association with master architect and interior designer Mary Elizabeth Jane Colter and its relationship with the Atchison, Topeka, and Santa Fe Railway and Fred Harvey Company and their developments on the south rim of the Grand Canyon. Similarly, the historic district was listed on the National Register in 1995 for its role in the railway's development of tourist facilities in Grand Canyon National Park. The NHL, historic district, and other cultural resources are shown in Figure 3.2 on page 30 in the EA.

Although the selected alternative includes some actions that would benefit these cultural resources in perpetuity (removal of non-contributing features, re-utilization of historic structures, rehabilitation of the entrance to the Desert View Watchtower and historic CCC-trail), it also includes the modification of some historic structures as well as the addition of modern elements at Desert View (orientation plaza and waysides, restrooms, and an entry sign; improvements to the amphitheater; the addition of threshold markers; the possible addition of paved ABA trails; the formalization of cultural demonstration spaces; the removal and revegetation of trails that are within the former alignment of East Rim Drive; and the potential location of a Cultural Heritage Site in the vicinity of the former visitor center) which have the potential to diminish the integrity of setting, design, materials, and feeling of the NHL and historic district. These additions could compromise the historical feeling of the NHL and historic district by altering the viewshed and circulation on-site. Potential modifications to the Old Bookstore could also alter the historic setting and feeling of the building by adding a feature adjacent to the structure that would change the mass, scale, and appearance of this historic property. However, the NHL, historic district, and other cultural resources will remain intact and will still be eligible for listing on the National Register despite negative, if not adverse (as defined by 36 CFR 800.5) impacts.

The selected alternative will not result in impairment of the NHL, historic district, or other cultural resources because the adverse effects on historic structures will be resolved through a Programmatic Agreement (PA) between the NPS and the Arizona State Historic Preservation Officer (SHPO). The PA includes stipulations to avoid, minimize, and/or mitigate adverse effects through consultation and actions such as redesigning project developments, fencing of sites during construction, monitoring of construction, and/or placing infrastructure outside site boundaries.

Conclusion

In conclusion, as guided by this analysis, good science and scholarship, advice from subject matter experts and others who have relevant knowledge and experience, and the results of public involvement activities, it is the Superintendent's professional judgment that there will be no impairment of park resources and values from implementation of the selected alternative. The NPS has determined that implementation of the selected alternative will not constitute an impairment of the resources or values of Grand Canyon National Park. This conclusion is based on consideration of the park's purpose and significance, a thorough analysis of the environmental impacts described in the EA, comments provided by the public and others, and the professional judgment of the decision maker guided by the direction of NPS Management Policies 2006.

