



**National Park Service  
U.S. Department of the Interior**

**Padre Island National Seashore  
Texas**

**FINDING OF NO SIGNIFICANT IMPACT  
Novillo Line Camp Enhancements**

Recommended:

*Mark E. Spier*

*3/8/2019*

Mark Spier  
Superintendent, Padre Island National Seashore

Date

Approved:

*Kate H Hammond*

*3/12/19*

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

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 construction of an interpretative trail and boardwalk from Park Rd 22 through the vegetated barrier flats to a point overlooking the historic ranch facilities at Padre Island National Seashore. The project aims to enhance and improve the visitor experience and provide opportunities to learn about the park's cultural resources with a new access trail, boardwalk, and interpretive signs describing the historical significance of cattle ranching on Padre Island. The elevated boardwalk will also provide visitors the opportunity to learn about the abundance, types, and important functions of wetlands occurring within the park.

The statements and conclusions reached in this finding of no significant impact (FONSI) are based on documentation and analysis provided in the EA. To the extent necessary, relevant sections of the EA are incorporated by reference below.

## **SELECTED ALTERNATIVE AND RATIONALE FOR THE DECISION**

Based on the analysis of the EA, NPS selected Alternative B – Construction of Novillo Line Camp Natural, Cultural, and Visitor Enhancements (the NPS preferred alternative).

The selected alternative will provide access for visitors to the Novillo Line Camp area with an interpretive trail that leads to a boardwalk. Currently, there is no official access available for visitors to observe the line camp except from the parking area on Park road 22 which lies at a distance of approximately 375 yards to the nearest features. Visitors occasionally go around the locked gate on the Chevron road and walk to the line camp along the road. The road is in poor condition with large ruts and deep pot holes. The caliche in the road becomes extremely slick when wet and is hazardous to traverse. Furthermore, after rainy periods or large storms, a portion of the road is flooded and requires wading for visitors to access the line camp. The proposed boardwalk will terminate at a point overlooking the line camp approximately 50 yards from the bunkhouse and kitchen. Construction within the project area will involve the use of trucks, heavy equipment, and loud power tools to build and place materials for the interpretive trail and boardwalk during the approximately 3 to 5 weeks of construction. In addition the project will implement a number of resource protection measures to minimize the degree and/or severity of adverse impacts on archeological and paleontological resources; soils; mosaic wetland vegetation; air quality and soundscapes; visitor use and experience; wildlife and special status species; and public health, safety, and park operations.

## **Rationale**

Alternative B was selected because it best meets the project purpose to:

- Enhance and improve the visitor experience and provide opportunities to learn about the park's cultural resources with a new access trail and interpretive boardwalk.
- Provide a safe means of accessing the Novillo cultural landscape.

## **MITIGATION MEASURES**

The selected alternative incorporates the mitigation measures listed in appendix A of this document.

#### **FINDING OF NO SIGNIFICANT IMPACT**

CEQ regulations at 40 CFR Section 1508.27 identify ten criteria for determining whether the Selected Action will have a significant impact on the human environment. The NPS reviewed each of these criteria, given the environmental impacts described in the EA, and determined there will be no significant impacts for any of the criteria.

The following impact topics were dismissed in the EA because they were found to have no potential for significant impacts, and include archeological and paleontological resources, soils, mosaic wetland vegetation, socioeconomics, soundscapes, visitor use and experience, and wildlife and special status species.

As described in the EA the selected alternative has the potential for adverse impacts on the cultural landscape. The proposed interpretive trail and boardwalk will have short term impacts during the approximately 3-5 week construction period and permanent impacts to the cultural landscape from the placement of the interpretive trail and boardwalk within the historic agricultural pasture.

Cultural landscapes and associated contributing resources are evaluated for significance and integrity by a process set forth and defined by the National Register of Historic Places, NPS. Integrity is the ability of a property to convey its significance through its physical features. Seven aspects of integrity are recognized by the National Register program: location, design, setting, materials, workmanship, feeling, and association. An adverse impact occurs when changes and alterations to a contributing feature diminish or destroy its ability to reflect significance through its physical features.

The proposed construction of the interpretive trail and boardwalk will result in changes that directly and permanently impact six of the seven aspects of integrity of the cultural landscape. Presence of a new interpretive trail and boardwalk will permanently impact the element of design since the landscape of Novillo was not designed by a master designer, but rather evolved from a combination of functionality, natural features, and land use. The major components of this "vernacular" design include the spatial layout of the line camp buildings, fences, corrals, and other features. The design and materials of which were influenced by readily available materials found along the seashore. A new trail and boardwalk will also permanently diminish the setting since this is not an original component of the physical element or a character-defining feature of the cultural landscape. Since the materials of the proposed interpretive trail and boardwalk will consist of new lumber and other modern materials not historically present in the landscape the aspect of materials will be permanently diminished. The aspect of workmanship will be permanently diminished by the interpretative trail and boardwalk since the proposed structures will be built by a contracted construction company. Aspects of both feeling and association will be permanently impacted by the interpretative trail and boardwalk since it is not part of the historic character. While these changes will have an adverse impact on the integrity of the cultural landscape the changes will only slightly diminish the overall integrity of location, setting, design, materials, workmanship, feeling or association and represent changes to a small fraction of the overall cultural landscape. Due to such a small area of impact (approximately 0.04 acres of approximately 22 acres), the Novillo Line Camp cultural landscape will retain sufficient integrity to relay its significance as a property

representing changes in agricultural practices and the history of cattle ranching on Padre Island from the early 19th Century to the modern era. Given this fact, though there will be adverse impacts on the Novillo Line Camp cultural landscape, it still can convey its significance and integrity as an historic property.

In accordance with Section 106 of the National Historic Preservation Act, the NPS sent a letter to the Texas State Historic Preservation Officer, Texas Historic Commission (TX SHPO), seeking concurrence with the park's determination that the undertaking would have no adverse effect on historic properties. The TX SHPO concurred with the park's determination on 04/22/13. The USFWS Ecological Services Office was also contacted for compliance with the Endangered Species Act and concurred with the park's determination that the aplomado falcon and whooping crane may be affected but not adversely (memo to file documenting phone call on 12/15/2016).

There will be no significant impacts on public health, public safety, or unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative impacts, or elements of precedence were identified. Implementation of the NPS selected alternative will not violate any federal, state, or local environmental protection law.

#### **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 impact 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 minimize the degree and/or extent of adverse impacts and will be implemented during the project.

#### **Air Quality**

- Equipment operators will be required to limit idling time to no longer than 5 minutes.

#### **Archeological, Ethnographic, and Paleontological Resources**

- The proposed locations for the Novillo boardwalk and trail were surveyed by an NPS archeologist on April 20-24, 2009 and July 8-17 2013, and no archeological sites were identified in the immediate project area. However, should construction unearth previously undiscovered cultural resources, work will cease in the area of discovery and the park will consult with the state historic preservation officer and the Advisory Council on Historic Preservation as necessary, according to 36 CFR 800.13 *Post Review Discoveries*.
- All contractors and subcontractors will be informed of the procedures to follow in the event of an inadvertent unearthing of archeological, ethnographic, and paleontological resources as well as the penalties for illegally collecting artifacts or intentionally damaging paleontological materials, archeological sites, or historic properties.
- During ground disturbing activities, qualified park staff will monitor work zones for archeological, ethnographic, or paleontological resources.
- In the unlikely event that human remains are discovered during construction, work will be stopped and provisions outlined in the Native American Graves Protection and Repatriation Act (1990) will be followed.

#### **Cultural Landscape**

- Building and site design will reflect the historic architectural characteristics and incorporate similar architectural features, materials, color, and rough cut nominal lumber to match construction techniques of the existing built environment.
- Designated traffic corridors will be delineated for heavy equipment operators to travel during placement of the proposed project components.
- Hours of outdoor construction will be limited to hours between sunrise and sunset.
- Equipment operators will be required to limit idling time to no longer than 5 minutes.

#### **Vegetation and Soils**

- Native vegetation and soils will be established on any disturbed soils after construction is completed.
- To avoid introduction of non-native plant species, contractors and equipment operators will be instructed to thoroughly clean all equipment and remove any plant material prior to entering the park. Division of Science and Resource Management will inspect equipment before it is brought into the park.
- During construction, qualified park staff will monitor work zones for any threatened or endangered species and will stop work and consult with the U.S. Fish and Wildlife Service if any are found.
- After construction erosion will be mitigated by re-contouring to match surrounding dune, ridge, and swale slopes, broadcasting native seed and covering the disturbed area with cut native grasses.

#### **Visitor Use and Experience**

- Visitors will not have access to the construction area during the 3 to 5 weeks of construction in order to protect visitor safety.

#### **Water Resources: Floodplains and Wetlands**

- To minimize petrochemical leaks from construction equipment, contractors and operators will be required to regularly inspect equipment and to repair leaks immediately or remove the equipment from the park. The contractor will be required to keep spill packs on site for rapid response to any spill.
- Erosion control measures, such as silt fence, sterile hay waddles and/or sand bags, will be used to minimize soil erosion.
- Best management practices will be followed in order to avoid any excessive disturbance to existing wetlands. This will include limiting construction to the dry season.
- Designated traffic corridors will be delineated for heavy equipment operators to travel during placement of the proposed project components.

#### **Wildlife and Special Status Species**

- Contractors will be made aware that state-listed species (Keeled Earless Lizard and Indigo Snake) could be present in the work area and if encountered they should not be harassed, handled, or killed. Photographs and descriptions of the protected species that may occur in the project area will be provided to contractors in order to avoid and/or minimize potential negative impacts to state-listed species.
- Avoid construction during the migratory season of October 15 to April 15 if possible.
- If it is not possible to avoid the migratory season and a whooping crane comes within 1,000 feet of construction activity all work should cease until the whooping crane moves outside the 1,000-foot buffer.
- Have a biological monitor, with work stop authority; educate all staff and contractors on the status, appearance, conservation measures and protocol on actions to take if a whooping crane is spotted.
- If tall equipment, such as a crane, is to be used during construction that is 15 feet in height or taller, that equipment should be marked or laid down during the night to assist in reducing or avoiding potential collisions.

## Non-Impairment Determination Novillo Line Camp Enhancements

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 wildlife in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wildlife 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 impact of the proposed action; and the cumulative impact of the proposed action in question and other impacts. An impact on any park resource or value may constitute impairment, but an impact will 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 Padre Island National Seashore are identified in the enabling legislation for the park, the Foundation for Planning and Management Statement, and the Long Range Interpretive Plan. Based on a review of these documents, the fundamental resources and values for Padre Island National Seashore come from the park's recreational opportunities, barrier island ecosystems, sea turtles, undeveloped barrier island, collective history, the 11,000-year-old continuum of human history, and providing for the benefit, enjoyment, education, and inspiration of this and future generations. 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 include: cultural landscape. Accordingly, a non-impairment determination is made for each of these 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 Novillo Line Camp: Natural, Cultural, and visitor Use Enhancements EA.

### **Cultural Landscape**

The proposed interpretive trail and boardwalk will have short term impacts during the approximately 3-5 week construction period and permanent impacts to the cultural landscape from the placement of the interpretative trail and boardwalk within the historic agricultural pasture.

Cultural landscapes and associated contributing resources are evaluated for significance and integrity by a process set forth and defined by the National Register of Historic Places, NPS. Integrity is the ability of a property to convey its significance through its physical features. Seven aspects of integrity are recognized by the National Register program: location, design, setting, materials, workmanship, feeling, and association. In order to retain integrity, a property and its contributing features must possess several, if not all of the aspects. An adverse impact occurs when changes and alterations to a contributing feature diminish or destroy its ability to reflect significance through its physical features.

The seven aspects of integrity are:

**Location:** Place where the historic property was constructed or place where the historic event occurred.

**Design:** The combination of elements that create the form, plan, space, structure, and style of a property.

**Setting:** The physical environment of a historic property.

**Materials:** The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.

**Workmanship:** The physical evidence of the crafts of a particular cultural or people during any given period in history or prehistory.

**Feeling:** A property's expression of the aesthetic or historic sense of a particular period of time.

**Association:** The direct link between an important historic even or person and a historic property.

During the approximately 3-5 week construction period there would be a temporary impact that would slightly diminish the integrity of the cultural landscape. The increased noise, dust, and visual intrusion of vehicles and equipment required for construction will slightly impact the integrity of the setting, feeling, and design during the approximately 3-5 week construction period.



The proposed construction of the interpretive trail and boardwalk will result in changes that directly and permanently impact six of the seven aspects of integrity of the cultural landscape. Presence of a new interpretive trail and boardwalk will permanently impact the element of design since the landscape of Novillo was not designed by a master designer, but rather evolved from a combination of functionality, natural features, and land use. The major components of this "vernacular" design include the spatial layout of the line camp buildings, fences, corrals, and other features. The design and materials of which were influenced by readily available materials found along the seashore. A new trail and boardwalk will also permanently diminish the setting since this is not an original component of the physical element or a character-defining feature of the cultural landscape. Since the materials of the proposed interpretive trail and boardwalk will consist of new lumber and other modern materials not historically present in the landscape the aspect of materials will be permanently diminished. The aspect of workmanship will be permanently diminished by the interpretative trail and boardwalk since the proposed structures will be built by a contracted construction company. Aspects of both feeling and association will be permanently impacted by the interpretative trail and boardwalk since it is not part of the historic character. While these changes will have an adverse impact on the integrity of the cultural landscape the changes will only slightly diminish the overall integrity of location, setting, design, materials, workmanship, feeling or association and represent changes to a small fraction of the overall cultural landscape. Due to such a small area of impact (approximately 0.04 acres of approximately 22 acres), the Novillo Line Camp cultural landscape will retain sufficient integrity to relay its significance as a property representing changes in agricultural practices and the history of cattle ranching on Padre Island from the early 19<sup>th</sup> Century to the modern era. Given this fact, though there will be adverse impacts on the Novillo Line Camp cultural landscape, it still can convey its significance and integrity as an historic property.

## **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 Padre Island National Seashore. 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*.

# TEXT CHANGE ERRATA AND RESPONSES TO PUBLIC COMMENTS

Novillo Line Camp: Natural, Cultural, and Visitor Use Enhancements  
Environmental Assessment

Padre Island National Seashore  
March 2019

The following text change errata, together with the Finding of No Significant Impact (FONSI) and the Environmental Assessment (EA), describe the final decision of the National Park Service for the Novillo Line Camp: Natural, Cultural, and Visitor Use Enhancements.

## TEXT CHANGE ERRATA

These errata are to be attached to the Novillo Line Camp: Natural, Cultural, and Visitor Use Enhancements EA dated November 2018 and are intended to correct or clarify statements in the EA other than typographical and minor editorial errors. For example, several of the text changes noted below were made to avoid confusion between “adverse impacts” under the National Environmental Policy Act (NEPA) and “adverse effects” under Section 106 of the National Historic Preservation Act (NHPA).

A) Alternative B – Construction of Novillo Line Camp Natural, Cultural, and Visitor Enhancements (Proposed Action and NPS Preferred) (pg.9)

*Current Text:*

If changes during final site design are inconsistent with the intent and effects of the selected action, as described in this EA, then additional compliance would be completed as appropriate.

*Revised Text:*

If changes during final site design are inconsistent with the intent and impacts of the selected action, as described in this EA, then additional compliance would be completed as appropriate.

B) Cumulative Effects (pg.16)

*Current Text:*

Ongoing activities are anticipated to temporarily impact approximately 0.22 acres of approximately 330 acres of the cultural landscape.

*Revised Text:*

Ongoing activities are anticipated to temporarily impact approximately 0.04 acres of approximately 22 acres of the cultural landscape.

C) Direct and Indirect Impacts of Alternative B – (Proposed Action and NPS Preferred) (pg.16)

*Current Text:*

Given this fact, though there would be adverse effects on the Novillo Line Camp cultural landscape, it still can convey its significance and integrity as an historic property

*Revised Text:*

Given this fact, though there would be adverse impacts on the Novillo Line Camp cultural landscape, it still can convey its significance and integrity as an historic property

D) Impacts of Alternative A – No Action (pg.15)

*Current Text:*

There would be no action and no new effects on the Novillo Line Camp cultural landscape under Alternative A.

*Revised Text:*

There would be no action and no new impacts on the Novillo Line Camp cultural landscape under Alternative A.

E) Cumulative Effects (pg.15)

*Current Text:*

Cumulative Effects

Because there would be no effect on the Novillo Line Camp cultural landscape, there would be no cumulative impacts.

*Revised Text:*

Cumulative Impacts

Because there would be no impact on the Novillo Line Camp cultural landscape, there would be no cumulative impacts.

F) Direct and Indirect Impacts of Alternative B – (Proposed Action and NPS Preferred) (pg.16)

*Current Text:*

An adverse effect occurs when changes and alterations to a contributing feature diminish or destroy its ability to reflect significance through its physical features.

*Revised Text:*

An adverse impact occurs when changes and alterations to a contributing feature diminish or destroy its ability to reflect significance through its physical features.

*Current Text:*

While these changes would have an adverse effect on the integrity of the cultural landscape the changes would only slightly diminish the overall integrity of location, setting, design, materials, workmanship, feeling or association and represent changes to a small fraction of the overall cultural landscape.

*Revised Text:*

While these changes would have an adverse impact on the integrity of the cultural landscape the changes would only slightly diminish the overall integrity of location, setting, design, materials, workmanship, feeling or association and represent changes to a small fraction of the overall cultural landscape.

G) Cumulative Effects (p.16)

*Current Text:* Cumulative Effects

*Revised Text:* Cumulative Impacts

H) Cumulative Effects (pg.17)

*Current Text:*

When the effects of the interpretative trail and boardwalk construction are combined with other past, present, and potential future impacts, the total cumulative impact on the Novillo Line Camp would continue to be beneficial or neutral, because the incremental impact of the proposed action would be slight and the Novillo Line Camp cultural landscape would still convey its significance and integrity as an historic property.

*Revised Text:*

When the impacts of the interpretative trail and boardwalk construction are combined with other past, present, and potential future impacts, the total cumulative impact on the Novillo Line Camp would continue to be beneficial or neutral, because the incremental impact of the proposed action would be slight and the Novillo Line Camp cultural landscape would still convey its significance and integrity as an historic property.

I) Mitigation Measures (page 14) Insert the following mitigation measures.

- Avoid construction during the migratory season of October 15 to April 15 if possible.
- If it is not possible to avoid the migratory season and a whooping crane comes within 1,000 feet of construction activity all work should cease until the whooping crane moves outside the 1,000-foot buffer.
- Have a biological monitor, with work stop authority; educate all staff and contractors on the status, appearance, conservation measures and protocol on actions to take if a whooping crane is spotted.
- If tall equipment, such as a crane, is to be used during construction that is 15 feet in height or taller, that equipment should be marked or laid down during the night to assist in reducing or avoiding potential collisions.

## RESPONSE TO PUBLIC COMMENTS

The EA was released for public review on December 6, 2018 to January 6, 2019. The PEPC website was taken offline during the federal government shutdown, which prohibited the ability of affected parties and the public to provide comments on any projects or proposals whose comment periods were open between December 21, 2018 and February 4, 2019, when PEPC was put back into service. To ensure that the public had ample opportunity to review and comment, the comment period for this proposal was reopened from February 4, 2019 to March 4, 2019.

One correspondence was received. No comments warranted the 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 minor word-processing edits and corrections to sentences as presented in the Errata.

No comments were considered substantive, however, there are a number of questions that the park would like to respond to and the questions and responses are presented below.

### PUBLIC ACCESS

1. **COMMENT** – Commenter inquired if the cultural landscape is currently open to park visitors.

**RESPONSE** – The Novillo Cultural Landscape is open to park visitors. Visitors can park in the small parking area and take a short hike of 0.3 miles down the access road to the Novillo bunkhouse, kitchen area, and corrals.

### TROPICAL WEATHER SYSTEMS

2. **COMMENT** – Commenter inquired about the proposed boardwalk being able to withstand tropical storms and hurricanes.

**RESPONSE** – The contingencies associated with this project include the use of stilts to raise the boardwalk to meet appropriate federal, state, and local building codes. The boardwalk will follow a nearby cross island dune line thereby giving it a final elevation of 16-18 feet above mean sea level or greater. The overall elevation of the boardwalk and viewing platform relative to the 100-year flood elevation is 3 feet relative to the 100-year floodplain. Associated velocities would probably be zero, and therefore, the structure would likely be unaffected during a major flood event. Because the investment is relatively low and the overall flood frequency at the site is low, the NPS can accept the risk of loss to the infrastructure.

## **WILDLIFE AND SPECIAL STATUS SPECIES**

3. **COMMENT** – Commenter mentioned if the boardwalk would feature interpretative signage of wildlife and special status species.

**RESPONSE** – This is an idea the park will be considering when developing the interpretive signs. Thank you.

## **CULTURAL RESOURCES**

4. **COMMENT** – Commenter asked about a park contingency for the inadvertent finding of cultural materials on the surface.

**RESPONSE** – The inadvertent discovery of cultural objects is always a possibility anywhere in the park especially after long periods of drought and high winds. The park policy regarding the inadvertent discovery of cultural materials on the surface is to contact our NPS Archeologist Rolando Garza and the Texas Historical Commission Archeology Division to consult on further actions that may be necessary to protect cultural remains.

## **EXOTIC PLANT MANAGEMENT**

5. **COMMENT** – Commenter inquired about any park measures to prevent the introduction of exotic plant species from visitor traffic on the boardwalk.

**RESPONSE** – The sandy nature of the parks soil profiles makes it very difficult for exotic species to become established due to low nutrients as well as the salty nature of the soil. Exotic vegetation does become established in areas of the park where the soil profile is disturbed by the introduction of caliche and other materials that provide additional nutrients that diversify the natural sandy profile. Since the proposed boardwalk construction does not involve the introduction of any caliche or other soils the probability of the introduction of exotic plant species from boardwalk visitor traffic is extremely low.

## **INTERPRETIVE PROGRAMS**

6. **COMMENT** – Commenter asked about the park's ability to provide interpretive programs with the expanded visitation to the new interpretive boardwalk.

**RESPONSE** – We agree that staff and new programs will be needed and have determined that additional staffing and programs can be supported.