



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

**Great Basin National Park  
Regions 8, 9, 10, and 12**

**FINDING OF NO SIGNIFICANT IMPACT  
LOWER LEHMAN CREEK CAMPGROUND EXPANSION  
NOVEMBER 2022**

Recommended:

*James Woolsey*

11/29/2022

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James Woolsey  
Superintendent, Great Basin National Park

Date

Approved:

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Frank Lands  
Regional Director, National Park Service, Interior Regions 8, 9, 10, and 12

Date

# 1. 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 expand the Lower Lehman Creek Campground at Great Basin National Park (park). The project is needed because in the years since construction, campground features and amenities have deteriorated and are outdated. Too few restrooms are in place for the number of visitors, and the existing restrooms need to be rehabilitated for accessibility compliance. Fire rings, grills, and picnic tables need replacement. Accessibility improvements and multilingual signage are needed to better serve a changing park visitor demographic.

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

## 2. Selected Alternative and Rationale for the Decision

Based on the analysis presented in the EA, the NPS selects Alternative 1 (the NPS preferred alternative) as described on pages 4 through 9 of the EA. The selected alternative will rehabilitate the existing campground, expand the campground to add new sites and other facilities including a vault toilet, replace the existing waterline with a new waterline, and reconfigure the campground entrance from Wheeler Peak Scenic Drive. The existing campground will be rehabilitated and improved to better meet the requirements of federal accessibility standards and guidelines, to restore wetlands that were impacted when the campground was originally constructed, and to upgrade the existing kiosk and trailhead signage. Additional improvements to the existing campground will include new campsite furnishings installed at each site; minor improvements to the concrete at the existing vault toilets and to one of the asphalt pullouts; cleaning existing culverts in and around the campground; placement of riprap at the inlet and outlet of the culverts; and application of a slurry seal (mixture of water, asphalt emulsion, aggregate, and additives) to the existing campground road.

The campground will be expanded to add 11 new campsites, which will be located along a new one-way S-shaped road east of the existing campground. Pedestrian routes, parking, the vault toilet, signage, and campsites will be designed to meet accessibility standards, from proposed accessible sites to campsite amenities. One new accessible vault toilet will be located centrally in the proposed campground area. Stormwater culverts will be constructed to mitigate runoff from sheet flows through campsites and the new circulation road, where feasible.

The existing water distribution system in the campground will be abandoned and a new waterline installed. The existing waterline between Upper Lehman Creek Campground

and Lower Lehman Creek Campground and the existing water distribution system at Lower Lehman Creek Campground will be abandoned in place. A new 2-inch-diameter, approximately 4,100-linear-foot water main will be installed to replace the existing waterline. A new water distribution system with yard hydrants and associated appurtenances will be installed.

In addition, the existing campground entrance from Wheeler Peak Scenic Drive will be reconfigured to allow better access for recreational vehicles (RVs) and vehicles pulling campers, and to improve safety. The campground entrance will be widened in place with asphalt to the southeast to accommodate turning movements into the campground from the east and west.

The project will implement resource protection measures and best management practices to minimize the degree or severity of adverse effects on air quality, archeological resources, historic structures, cultural landscapes, night sky, paleontological resources, soils, water quality, soundscapes, vegetation, visitor use and experience, wetlands, and wildlife (see a list of mitigation measures in Appendix A).

## **Rationale**

Alternative 1 was selected because it best meets the project purpose to reconstruct and expand Lower Lehman Creek Campground to extend its useful life, enhance the public enjoyment of the outdoors, increase campground capacity, and connect visitors to the natural environment. The selected alternative also meets the park's objectives of ensuring that the Lower Lehman Creek Campground continues providing outstanding outdoor recreational opportunities; extending the useful life of the campground; conserving and restoring cultural resources; stabilizing and restoring campsites, the trailhead, and fee stations; minimizing and restoring impacts on natural resources; upgrading restrooms and waterlines up to current standards; and improving accessibility and multilingual informational/educational signage by adding features in response to a changing visitor demographic.

## **3. Mitigation Measures**

Under its Organic Act, the NPS has the authority to develop and direct mitigation for impacts on resources under its jurisdiction. This is in addition to the requirements that may be created through the need to comply with laws and regulations managing resource impacts that are overseen by other agencies. To meet these obligations, the NPS has 1) developed Management Policies and Director's Orders that identify the authorities (laws, regulations, and executive orders) directing how impacts and mitigation to resources shall be managed and 2) outlined the policies and procedures by which the NPS shall comply with these authorities. A full listing of the NPS policies is available from the NPS Office of Policy website at <https://npspolicy.nps.gov/index.cfm>

The selected alternative incorporates the mitigation measures and best management practices listed in Appendix A to minimize impacts on park resources.

## **4. Other Alternatives Considered**

In addition to the selected alternative, the EA analyzed one other alternative and its impacts on the environment: Alternative 2, the No Action Alternative.

### **Alternative 2: No Action Alternative**

Under the No Action Alternative, the NPS would not rehabilitate or expand Lower Lehman Creek Campground. The current operation and management of the campground would continue unchanged. Currently, the accessible campsite, vault toilet, and fee station do not meet accessibility requirements and the waterline does not meet State of Nevada requirements. These conditions would continue under the No Action Alternative. The No Action Alternative was not selected because it would not meet the purpose and need for the project.

## **5. Public Involvement/Agency Consultation**

### **Public Scoping**

The park initiated public scoping on November 2, 2021 in accordance with NPS guidance under NEPA, and the public comment period ran through December 1, 2021. Public notices were distributed through the following sources:

- A press release posted on the park website
- A news release sent electronically (via email) to various stakeholders, agencies, and media groups

The park received three correspondences during scoping, and the comments were considered during the development of the EA.

### **Draft EA Public Review**

Public comments on the Draft EA were invited for 30 days from March 14 through April 13, 2022. During the review period, six comment correspondences were submitted to the NPS through the PEPC website. Four of the six correspondences were supportive of the selected alternative. NPS responses to the comments received are in Appendix B. All comments received are incorporated into the project record. Public notices of the comment period were distributed through the same sources as public scoping, listed above.

## **Nevada State Historic Preservation Office and Tribal Consultation**

As required by Section 106 of the National Historic Preservation Act, the park consulted with the Nevada State Historic Preservation Office (SHPO) and associated tribes to assess the effect of the project on historic properties. The Section 106 consultation process was conducted separately from, but concurrently with, the NEPA process. The NPS determined that the selected alternative will have an adverse effect on the Lower Lehman Creek Campground and requested concurrence from the SHPO on May 4, 2022. The SHPO concurred with this determination in a letter dated June 10, 2022. A memorandum of agreement (MOA) has been developed between the NPS and Nevada SHPO to mitigate adverse effects. The MOA includes stipulations that must be completed to mitigate adverse effects on historic properties associated with the project (Appendix C).

The park sought tribal input to help inform the analysis of the selected alternative. The project was introduced to the following affiliated tribes on the following dates, and the tribes were sent letters (December 2021) regarding the project:

- Duckwater Shoshone (August 30, 2021)
- Ely Shoshone (June 10, 2021)
- Confederated Tribes of the Goshute (July 16, 2021)

No cultural resources in the areas of potential effect, either tangible or intangible sites linked to tribal traditions and culture, were identified by the tribal representatives.

On November 2, 2021, the NPS notified the three tribes that an environmental assessment would be prepared for the project, in accordance with the National Environmental Policy Act. Formal consultation letters concerning the results of the Class III Archeological Investigation and the Historic Context Study were also sent to the three tribes on December 6, 2021. The formal consultation letters were sent to seek input from the area Tribes concerning the results of the Class III Archeological Investigations and the Historic Context Study and the potential affects the project may have on known and/or unknown culturally significant sites.

Copies of the environmental assessment were provided to the tribes, and representatives of the three tribes have expressed no concerns about the proposed project but requested that they be notified if any precontact archeological resources are unexpectedly discovered during construction.

## **U.S. Army Corps of Engineers**

A U.S. Army Corps of Engineers (Corps) Section 404 permit will be required for impacts on 654.1 square feet (0.015 acre) of wetlands. All wetland impacts will be restored in place or immediately adjacent to the area of impact. The NPS will coordinate with the Corps regarding Section 404 permitting under the Clean Water Act. Proposed impacts on wetlands are described in the Errata attached to this FONSI (Appendix D).

## 6. Finding of No Significant Impact

As described in the EA and below, the selected alternative has the potential for adverse impacts on historic structures, historic districts, and cultural landscapes; vegetation and wetlands; and visitor use and experience. No potential for significant adverse impacts was identified as described below. There will be no significant impacts on public health, public safety, or unique characteristics of the region. No highly uncertain or controversial impacts, unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the NPS selected alternative will not violate any federal, state, or local environmental protection law.

### Historic Structures, Districts, and Cultural Landscapes

Implementing the selected alternative will result in adverse effects on historic structures that contribute to the Wheeler Peak Scenic Area historic district from introducing new nonhistorical elements that will detract from the historic design, setting, and feeling of the existing campground by introducing a new visual element. The campground expansion will alter the historical design of the existing campground by adding new ingress from the existing campground circulation pattern, widening the ingress, rehabilitating a campsite to improve accessibility, adding an asphalt pull-off parking area, removing a campsite to improve wetlands, and removing a campsite to construct ingress to the campground expansion. However, the design of the campground expansion will be similar to the historic Operation Outdoors design principles, including the use of herringbone-type campsite layout and pull-throughs. The project will also affect the historic setting and feeling of the proposed Wheeler Peak Scenic Area historic district and cultural landscape by introducing a new visual element.

The proposed Wheeler Peak Scenic Area historic district will remain intact and will still be eligible for listing in the National Register of Historic Places; therefore, the adverse effects will be less than significant. Rehabilitation of historic buildings and structures will adhere to the *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation*. To ensure appropriate treatment of historic properties, the NPS and Nevada SHPO signed a MOA with stipulations on November 17, 2022 for the treatment of historic properties that may be adversely affected by project implementation (Appendix C). The project will not result in the loss or destruction of significant scientific, cultural, or historical resources.

### Vegetation and Wetlands

Construction will result in the permanent loss of 0.79 acre of shrubland, grassland, and riparian woodland vegetation communities. About 1.66 acres of vegetation will be temporarily disturbed. Impacts on wetlands will be about 0.015 acre and will be restored and revegetated. Temporarily disturbed areas will be revegetated with native species following construction as described in Appendix A of this FONSI. Overall, the project's

impacts will not be significant because less than 0.01 percent of the entire park's vegetation will be affected, and temporary impacts will be restored.

Because the current water system is buried beneath mature mountain mahogany, aspen, and pinyon pine trees in places, breaks and leaks often require disturbance to vegetation to repair. Abandoning the current waterline in place will reduce the disturbance of vegetation required for periodic repairs to the pipeline, resulting in a long-term benefit to vegetation. Restoration of campsite #7 will restore about 700 square feet (0.016 acre) of wetlands and result in a beneficial effect on vegetation by restoring a site that is currently impacted to a more natural state and creating new wetlands.

### **Visitor Use and Experience**

Rehabilitation of the existing campground will result in long-term beneficial effects on visitor use by extending the life of the campground and providing a higher quality experience for campers. Improvements to the kiosk and interpretive signs will improve the visitor experience by educating visitors about the park's cultural and natural resources. Use of multilingual interpretive signs will improve the visitor experience by increasing the number of visitors who can understand the signs. Improvements to the accessible campsite and construction of a new accessible campsite will have beneficial effects by improving accessibility and removing barriers. Improving the trailhead for the trail between Upper Lehman Creek Campground and Lower Lehman Creek Campground will benefit visitors.

Expanding Lower Lehman Creek Campground with 11 new campsites will increase the current number of developed campsites in the park from 124 to 135, an increase of 9 percent. This will benefit the visitor experience by meeting growing visitor demand for campsites, especially in the summer months. Expanding the campground will also help meet visitor demand for sites that can accommodate larger RVs. Replacing the waterline that provides water to the campground will benefit the visitor experience by extending the life of the water system and ensuring compliance with water quality standards. Reconfiguring the campground entrance will improve the visitor experience by allowing better access for RVs and vehicles pulling campers.

Closing the campground for up to two years during construction will temporarily remove 11 of the 124 developed campsites. The closure will adversely affect the visitor experience for visitors planning to camp in the park during the summer months, because fewer campsites will be available during the construction period. The number of sites that can accommodate large RVs will decrease from 48 to 37 during the peak season, a decrease of about 23 percent, which will last until construction is complete.

To mitigate the effects of closing the campground during construction, the park will keep the Baker Creek Campground open year-round during closure of the Lower Lehman Creek Campground, accommodating offseason campers. The park will advertise the closure in advance of construction on the park's website and through social media to

inform visitors, allow visitors to make alternate plans, and make visitors aware of the availability of the Baker Creek Campground as an alternate camping destination in the park.

Installation of the waterline along Wheeler Peak Scenic Drive could require temporary road closures or restrictions, which would adversely affect visitors travelling to Upper Lehman Creek Campground, Wheeler Peak, or other facilities accessed from the road by delaying or preventing travel to these areas.

Overall, the project's impacts on visitor use and experience will be less than significant because adverse impacts will only occur during construction and will only affect 9 percent of the developed campsites in the park. Long-term effects of the project on visitor use and experience will be beneficial.

## **7. Conclusion**

As described above, the selected alternative does not constitute an action that meets the criteria requiring 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:  
Selected Alternative Mitigation and Best Management  
Practices**

# Appendix A: Mitigation and Best Management Practices

## Lower Lehman Creek Campground Expansion Environmental Assessment

### Great Basin National Park

**November 2022**

The following practices will be implemented under the selected action.

Measures	Responsible Party
<b>General Measures</b>	
Fuel containment will be required for all fuel caches.	Great Basin National Park (GRBA) project manager, construction contractor
Equipment will be free of any fluid leaks (fuel, oil, hydraulic fluid, etc.) upon arrival to the work site and will be inspected at the beginning of each shift for leaks. Leaking equipment will be removed off-site for necessary repairs before the commencement of work.	GRBA project manager, construction contractor
All work will be restricted to the pre-approved construction area. No impacts on areas outside of the construction area will occur.	GRBA project manager, construction contractor
The project area will be kept trash free at all times.	GRBA project manager, construction contractor
Construction equipment will be restricted to paved surfaces where practicable to avoid impacts on natural and cultural resources, including wetland areas. If construction equipment must be used or staged off paved surfaces, best management practices (BMPs) will be implemented to minimize potential for adverse impacts.	GRBA project manager, construction contractor
The contractor will be required to follow National Park Service (NPS) construction contract standards during construction, including implementation of an accident prevention program, installation of warning signs at the construction site and along the nearby parking lot, and installation and maintenance of construction fences around the construction sites to prevent noncontractors and the public from entering the construction areas.	GRBA project manager, construction contractor
A spill prevention and pollution control program will be implemented for hazardous materials. Standard measures will include hazardous materials storage and handling procedures; spill containment, cleanup, and reporting procedures; and limitation of refueling and other hazardous activities to nonsensitive sites.	GRBA project manager, construction contractor

<b>Measures</b>	<b>Responsible Party</b>
The construction area will be fenced to keep related disturbances within an NPS-defined and minimal impact area required for construction.	GRBA project manager, construction contractor
All mitigation/protection measures will be clearly stated in the construction specifications, and workers will be instructed to avoid conducting activities beyond the fenced construction zone.	GRBA project manager, construction contractor
Fueling of machinery will be conducted only in approved equipment staging areas away from water bodies. Any spills of hazardous materials or fuel will be cleaned up immediately to prevent contamination or discharge into ground or surface waters. Construction equipment will be regularly inspected for leaks of fuel, lubricants, and other chemicals.	GRBA project manager, construction contractor
<b>Air Quality</b>	
Standard dust abatement measures will include the following elements: watering or otherwise stabilizing soils, covering haul trucks, employing speed limits on unpaved roads, minimizing vegetation clearing, and revegetating after construction.	GRBA project manager, construction contractor
<b>Archeological Resources</b>	
If human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction activities, all work on the project will stop and the Great Basin National Park (park) archeologist will be contacted immediately. As required by law, the coroner will be notified first. All provisions outlined in the Native American Graves Protection and Repatriation Act (1990) will be followed. If non-Indian human remains are discovered, standard reporting procedures to the proper authorities will be followed, in addition to all applicable federal, state, and local laws.	GRBA project manager, construction contractor
If previously unknown archeological resources are discovered during construction, all work in the immediate vicinity (600 feet) of the discovery will be halted until the resources are identified and documented and an appropriate mitigation strategy developed in consultation with the State Historic Preservation Officer (SHPO) and, as necessary, traditionally associated American Indian tribes. Mitigation strategies will be developed in accordance with pertinent laws and regulations, including the stipulations of the 2008 Programmatic Agreement Among the National Park Service (U.S. Department of the Interior), the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers.	GRBA project manager, construction contractor
All workers will be informed of the criminal penalties for illegally collecting artifacts or intentionally damaging any archeological or historic property. Workers will also be informed of the correct procedures should previously unknown resources be uncovered during construction activities.	GRBA project manager, construction contractor

<b>Measures</b>	<b>Responsible Party</b>
<p>The limits of the area(s) surveyed for archeological resources will be identified at the construction contract start-up meeting and clearly flagged in the field. The NPS will ensure that all contractors and subcontractors are informed of the penalties for illegally collecting artifacts or intentionally damaging archeological sites, historic buildings and structures, or elements of the cultural landscape.</p>	<p>GRBA project manager, construction contractor</p>
<b>Historic Structures / Cultural Landscapes</b>	
<p>Rehabilitation of historic buildings and structures will adhere to the <i>Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation</i>.</p>	<p>GRBA cultural resources staff, GRBA project manager</p>
<p>No National Register of Historic Places listed or eligible buildings or structures will be removed or allowed to decay naturally (“molder”) without prior review by park and region cultural resource specialists, including approval by the regional director, and consultation with the SHPO. Before a National Register of Historic Places listed or eligible structure is removed or allowed to molder, appropriate documentation recording the structure will be prepared in accordance with Section 110(b) of the National Historic Preservation Act and the documentation submitted to the Historic American Buildings Survey/Historic American Engineering Record/Historic American Landscapes Survey (HABS/HAER/HALS) program.</p>	<p>GRBA cultural resources staff, GRBA project manager</p>
<p>Rehabilitation of the cultural landscape features will adhere to the <i>Secretary of the Interior's Standards for the Treatment of Historic Properties and the Guidelines for the Treatment of Cultural Landscapes</i>.</p>	<p>GRBA cultural resources staff, GRBA project manager</p>
<p>Because the project will affect historic structures that contribute to the Wheeler Peak Scenic Area historic district, the NPS must consider the effects of the undertaking on historic properties and afford the SHPO an opportunity to comment on the potential effects of the project on the historic district and contributing structures. The NPS, in consultation with the SHPO and other consulting parties, will work to minimize or mitigate the effects of the undertaking on historic properties. These mitigations can be found in the MOA in Appendix C.</p>	<p>GRBA cultural resources staff, GRBA project manager</p>
<b>Night Sky</b>	
<p>The NPS will strive to limit the use of artificial outdoor lighting to that which is necessary for basic safety requirements and to ensure that all outdoor lighting is shielded to the maximum extent possible to keep light on the intended subject and out of the night sky.</p>	<p>GRBA project manager, construction contractor</p>
<b>Paleontological Resources</b>	
<p>If unknown paleontological resources are discovered during construction, work in that location will be stopped until the resources can be properly recorded and evaluated. Measures will be taken to avoid further resource impacts or to mitigate their loss or disturbance</p>	<p>GRBA cultural resources staff, GRBA project manager</p>
<b>Public Health and Safety</b>	

<b>Measures</b>	<b>Responsible Party</b>
The length of trench permitted to be open at any time will be limited when, in the opinion of the GRBA project manager, such limitation will be necessary for public safety, and will be less than 400 feet.	GRBA project manager, construction contractor
All trenches and excavations left open overnight will be protected with fencing, concrete barriers, signage, or any other measures required to protect public safety.	GRBA project manager, construction contractor
<b>Soils and Water Quality</b>	
All sedimentation control devices/materials will be inspected weekly for quality control. Replacement of worn or damaged components will be undertaken immediately.	GRBA project manager, construction contractor
A Stormwater Pollution Prevention Plan (SWPPP) will be prepared for the project that will identify best management practices consistent with the Nevada Department of Environmental Protection’s requirements.	GRBA project manager, construction contractor
Soil erosion will be minimized by limiting the time that soil is left exposed and by applying other erosion-control measures, such as erosion control matting, silt fencing, and sedimentation basins in construction areas to reduce erosion, surface scouring, and discharge to water bodies.	GRBA project manager, construction contractor
<b>Soundscape Management</b>	
Noise abatement measures will be implemented during construction. Standard noise abatement measures will include the following: a schedule that minimizes impacts on adjacent noise-sensitive uses, the use of the best available noise-control techniques wherever feasible, the use of hydraulically or electrically powered impact tools when feasible, and location of temporary noise sources as far from sensitive uses as possible.	GRBA project manager, construction contractor
To reduce noise and pollution emissions, construction equipment will not idle any longer than is necessary for safety or mechanical reasons.	GRBA project manager, construction contractor
Mufflers and sound attenuation devices will be installed and maintained on all equipment and vehicles, only well-maintained and properly functioning equipment and vehicles will be used, and portable wooden sound screens will be used to minimize particularly noisy operations such as air compressors.	GRBA project manager, construction contractor
<b>Vegetation</b>	
All vehicles, equipment, and tools will be cleaned (i.e., pressure washed to remove mud, debris, and plant material) prior to entering the park to prevent the spread of nonnative plant material. Before entering the park, equipment will be inspected by NPS staff for compliance.	GRBA project manager, construction contractor
Invasive plants will be removed from construction areas using approaches prescribed in the NPS Integrated Pest Management Program.	GRBA project manager, GRBA natural resources staff

<b>Measures</b>	<b>Responsible Party</b>
Any vegetation lost during the construction process will be mitigated by the park by natural re-vegetation, planting or seeding of native species. Seed will be certified weed-free, and all planting stock, seed mixes, and vendors for revegetation materials will be preapproved by the NPS.	GRBA project manager, GRBA natural resources staff
BMPs will be implemented to prevent the spread or introduction of invasive plants, such as ensuring that construction-related equipment arrives at the site free of mud and seed-bearing materials and certifying that any seeds or straw material are weed free. Tools and machinery will be thoroughly cleaned when moving from an area heavily covered with invasive plants to an area without invasive vegetation.	GRBA project manager, construction contractor
Only certified weed-free products will be used. Agricultural products (e.g., straw or matting) will be obtained from the local area. When not available locally, products will be sourced from northern latitudes and from states with an established weed-free certification program.	GRBA project manager, GRBA natural resources staff
Gravel and fill will be sourced from the project area or local area whenever possible.	GRBA project manager, construction contractor
<b>Visitor Use and Experience</b>	
A traffic control plan will be implemented, as warranted. Standard measures include strategies to maintain safe and efficient traffic flow during the construction period.	GRBA project manager, construction contractor
Information on upcoming closures, including closure dates and arrangements of alternative access points, will be posted on the park website, distributed at other visitor centers in the park, and posted at the project site. When closures are necessary, information on alternative opportunities for visitor use will be publicized on the park website and on signs at the access points.	GRBA project manager, GRBA Public Information Officer
There may be some periods when the nature of the construction work may require temporary road closures or traffic may be periodically subjected to alternating one-way flow. All efforts will be made to reduce any delays as much as possible and to alert park staff as soon as possible if delays longer than normal are expected. Flaggers will be used during work hours to control traffic and visitors will be informed of construction activities and associated delays.	GRBA project manager, construction contractor
Construction equipment will not be stored along roads overnight without prior approval of park staff.	GRBA project manager, construction contractor
The Public Information Officer will be provided with the project schedule as soon as it is known and provide periodic updates of project work.	GRBA project manager, Public Information Officer, construction contractor

<b>Measures</b>	<b>Responsible Party</b>
A public information program to warn of temporary closures, delays, and road hazards during construction will be implemented. This program will help convey appropriate messages to the public and aid in mitigating potential impacts on visitors' expectations and experiences. The public information program will ensure that this project is communicated to affected staff and visitors.	GRBA project manager, Public Information Officer
Temporary full closure of areas outside the construction limits may be necessary on limited occasions. Such full closures will be for the minimal time required to complete the work activity.	GRBA project manager, construction contractor
<b>Wetlands</b>	
Where wetlands occur near construction activities, construction limits will be clearly demarcated, such as with fencing, to minimize the potential for wetland fill outside of the intended project area.	GRBA project manager, construction contractor
Temporarily disturbed wetland areas will be restored with native wetland vegetation following construction. The method will be determined by park staff and may include natural re-vegetation, planting, or seeding of native plants.	GRBA project manager, construction contractor
Permanently impacted wetlands will be replaced at a 1:1 ratio.	GRBA project manager, construction contractor
A Section 404 permit will be obtained from the U.S. Army Corps of Engineers (Corps), and mitigation requirements specified by the Corps will be implemented.	GRBA project manager, construction contractor
BMPs for wetlands will be implemented as required in Appendix 2 of the NPS Procedural Manual #77-1: Wetland Protection (NPS 2016).	GRBA project manager, construction contractor
<b>Wildlife</b>	
GRBA staff will survey for nesting birds between May 1 and July 15. No tree cutting or vegetation clearing will occur between May 1 and July 15 if nesting birds are present to ensure compliance with the Migratory Bird Treaty Act.	GRBA project manager, construction contractor
BMPs will be implemented to reduce the potential for wildlife to scavenge food from humans. Wildlife-proof garbage containers will be required at all construction sites.	GRBA project manager, construction contractor
Temporary earthen wildlife escape ramps will be provided as necessary to prevent wildlife becoming entrapped within the trench during waterline construction if trenches are left open overnight.	GRBA project manager, construction contractor
To protect snakes and other small animals from entanglement, no nylon netting will be used in erosion control materials. Erosion control materials will be 100% natural materials.	GRBA project manager, construction contractor

## **Appendix B: Comments and Responses**

**Appendix B: Comments and Responses**  
**Lower Lehman Creek Campground Expansion**  
**Environmental Assessment**  
**Great Basin National Park**  
**November 2022**

The National Park Service (NPS) prepared an environmental assessment (EA) in compliance with the National Environmental Policy Act (NEPA) and released it for public review from March 14 through April 13, 2022, for a 30-day public comment period. During the 30-day public comment period, NPS received six correspondences through the NPS Planning, Environment, and Public Comment (PEPC) website.

The NPS is required to respond to substantive comments submitted during the public review period for EAs. All comments that are timely received are considered, and the standard practice is to respond to substantive comments that are submitted during the public review period.

Substantive comments are those that:

- question, with reasonable basis, the accuracy of the information in the NEPA document;
- question, with reasonable basis, the adequacy of the environmental analysis;
- present reasonable alternatives other than those presented in the NEPA document; or
- cause changes or revisions in the proposal.

Substantive comments raise, debate, or question a point of fact or analysis. Comments that merely support or oppose a proposal or that merely agree or disagree with NPS policy are not considered substantive and do not require a formal response. Several non-substantive comments were received expressing general support for the project. A full list of commenters, including all correspondences received, is available in the project record. Where applicable, responses to substantive comments are included below.

<b>Concern Statement</b>	<b>Response</b>
A commenter stated that the NPS does not have water rights to divert and use water from Lehman Creek. The commenter stated that any diversion of water from Lehman Creek for use in the campground would be a violation of U.S.C. 410mm-1(h), the Baker-Lehman Decree, the law of prior appropriation, and Nevada Rev. Stat. 533.085.	As the issue of water use in Great Basin National Park is currently being litigated, whether park usage is in violation of law has yet to be decided.

<p>A commenter stated that additional sites should not be added, and the number of visitors should be limited instead.</p>	<p>Limiting the number of visitors to the park is outside the scope of this project.</p>
<p>A commenter expressed support for continued availability of tent camping, including within the expansion at Lower Lehman Creek Campground.</p>	<p>Tent camping will continue to be offered at Lower Lehman Creek Campground.</p>
<p>A commenter stated that NPS should implement best management practices and mitigation measures to protect natural and cultural resources.</p>	<p>Best management practices and mitigation measures are included in the EA and Appendix A of the Finding of No Significant Impact (FONSI).</p>
<p>A commenter stated that no ground disturbance should occur near wetlands or riparian habitats.</p>	<p>As described in the EA and the Errata (Appendix D of the FONSI), temporary impacts of a limited scale would occur to wetlands and riparian vegetation, but impacts would not be significant, and any impacts would be mitigated and wetlands restored. These temporary impacts are necessary for the installation of the waterline in order to serve the park’s campgrounds and visitor sites.</p>
<p>A commenter stated that the project should use solar, wind, or other renewable energy sources.</p>	<p>No new power sources are proposed.</p>

**Appendix C:  
Memorandum of Agreement**

**MEMORANDUM OF AGREEMENT  
BETWEEN  
THE NATIONAL PARK SERVICE (US DEPARTMENT OF THE INTERIOR)  
AND THE  
NEVADA STATE HISTORIC PRESERVATION OFFICER  
REGARDING REHABILITATION OF THE BRISTLECONE RECREATION AREA AND  
SUMMIT TRAILHEAD AND THE LOWER LEHMAN CREEK CAMPGROUND  
AT GREAT BASIN NATIONAL PARK  
WHITE PINE COUNTY**

**Whereas**, the National Park Service (NPS) plans to rehabilitate the Bristlecone Recreation Area, Summit Trailhead, and the Lower Lehman Creek Campground as described in Appendix I in White Pine County (the undertaking) and in doing so will meet the requirements for consideration under Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108); and

**Whereas**, the NPS consulted with the Nevada State Historic Preservation Officer (SHPO) pursuant to 36 CFR Part 800; and

**Whereas**, the NPS, in consultation with the SHPO, identified the area of potential effects (APE) as described in Appendix II; and

**Whereas**, the NPS, in consultation with the SHPO, has determined that the Lower Lehman Creek Campground and Wheeler Peak Scenic Drive will remain unevaluated for listing in the National Register of Historic Places (NRHP) but for purposes of this undertaking will be treated as eligible under all of the Secretary of Interior's Significance Criteria pending further review and evaluation of the period of significance; and

**Whereas**, the NPS, in consultation with the SHPO, has determined that the undertaking will have an adverse effect on historic properties; and

**Whereas**, the NPS consulted with the Duckwater Shoshone, Ely Shoshone, and Confederated Tribes of the Goshute traditionally associated with the lands of Great Basin National Park (collectively referred to as the Tribes) and has notified the Tribes of the undertaking's adverse effect and the development of a Memorandum of Agreement (MOA). The Tribes have expressed no concerns about the undertaking but requested only that they be notified if any precontact archeological resources are unexpectedly discovered during construction; and

**Whereas**, the NPS sought and considered the views of the public on the proposed undertaking during a public comment period from March 14 through April 13, 2022 and received six comments, all of which were considered during continued planning for the undertaking; and

**Whereas**, the NPS notified the Advisory Council on Historic Preservation (ACHP) of the adverse effect determination with specified documentation on August 11, 2022 in

accordance with 36 CFR §800.6(a)(1) and the ACHP declined to participate in the consultations pursuant to 36 CFR § 800.6(a)(1)(iii); and

**Now, Therefore**, the NPS and the SHPO agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effects of the undertaking on historic properties.

### **Stipulations**

The NPS shall ensure that the following measures are carried out:

#### **I. Standards and Qualifications**

The NPS will ensure that all work carried out in accordance with this agreement shall be done by or under the direct supervision of appropriate historic preservation professionals who, at a minimum, meet the *Secretary of the Interior's Professional Qualifications Standards* for archaeology, history, architectural history, or historic architecture, as appropriate (48 FR 44738-44739). All actions taken shall meet the Secretary of Interior's Standards for that activity consistent with 36 CFR § 800.2(a)(1). The NPS will ensure that contractors retained for services also meet these professional qualifications standards.

#### **II. Mitigation of Adverse Effects**

- A. NPS Revision of the Multiple Property Documentation Form (MPDF) for Operation Outdoors and Lower Lehman Creek Campground NRHP Determination of Eligibility (DOE) Form.
  1. The NPS will revise the following two documents:
    - a. MPDF for the United States Forest Service's Operation Outdoors program in Great Basin National Park.
      - 1) Expand the Period of Significance to be 1945-1971.
      - 2) Expand the property types to include Pre-Operation Outdoors Campgrounds, Prototype Campgrounds, Campgrounds based on 1930s Design Principles, etc., and classifying Lower Lehman Campground (D430) in the appropriate category type.
      - 3) Edit or add to the registration requirements throughout the MPDF (including on pages 44 and 50) to include individualized registration requirements for all additional property types.
      - 4) Clarify whether there are characteristics all properties must demonstrate to be considered eligible under the MPDF, not only Operation Outdoors resources, but also for Pre-Operation Outdoors such as D430 and all newly added property types (refer to Page 44 of the previously submitted MPDF).
    - b. NRHP DOE Form for the Lower Lehman Creek Campground (D430).

- 1) Edit the form to indicate the resource is eligible only under Criterion C by removing eligibility under Criteria A and D.
  - 2) Correct a pagination error resulting in the apparent omission of page 9.
  - 3) Clarify whether or not the 1965 rehabilitation of D430 truly exemplifies the design standards in the *Region 4 Recreation Handbook* pursuant to the registration requirements for Post-Operation Outdoors resources (refer to Page 44 of the previously submitted MPDF).
2. The NPS will submit the revised two documents to the SHPO for review and comment. The SHPO will have thirty (30) calendar days from the date of receipt to conduct the review and submit comments unless otherwise negotiated. If the SHPO fails to respond within the thirty (30) calendar day time period, the NPS will finalize the revised two documents.
  3. The NPS will address all SHPO comments on the draft documents and submit revisions to the SHPO for review and comment. The SHPO will review the revisions within fifteen (15) calendar days of receipt. If the SHPO does not respond within fifteen (15) calendar days of receipt, the NPS will finalize the submission.

B. Photo Documentation

1. NPS will ensure that photo documentation will be performed to National Register of Historic Places photo policy standards ([https://www.nps.gov/subjects/nationalregister/upload/Photo\\_Policy\\_update\\_2013\\_05\\_15\\_508.pdf](https://www.nps.gov/subjects/nationalregister/upload/Photo_Policy_update_2013_05_15_508.pdf)). Photo documentation of preconstruction conditions will be clear, well-composed, and provide an accurate visual representation of the historic landscape and features associated with the Lower Lehman Creek Campground and Wheeler Peak Scenic Drive in the two locations where construction activity will occur. All photographs will be labeled, and views will be keyed to site plan maps. In addition, images at each resource will include:
  - a. Lower Lehman Creek Campground (D430)
    - 1) General contextual views capturing the spatial relationship of the campground and its structural elements to the surrounding landscape; and
    - 2) Structural elements including the campground loop road, comfort stations, water distribution system features, kiosks, campsite parking spurs, campsite features, and culverts.
  - b. Wheeler Peak Scenic Drive (S3208)
    - 1) General contextual views capturing the spatial relationship of the roadway and its structural elements to the surrounding landscape within the two locations where construction activity will occur along Wheeler Peak Scenic Drive; and
    - 2) Structural elements within the two locations where construction activity will occur along Wheeler Peak Scenic Drive including the Roadway, Summit Trailhead Parking

Area, Upper Lehman Campground Pull-out, and culverts should any exist within the project area.

2. The NPS will submit draft digital copies of the photo documentation to the SHPO for review and comment. The SHPO will have thirty (30) calendar days from the date of receipt to conduct the review and submit comments unless otherwise negotiated. If the SHPO fails to respond within the thirty (30) calendar day time period, the NPS may finalize the photo documentation.
3. The NPS will address all SHPO comments on the draft documents and submit revisions to the SHPO for review and comment. The SHPO will review the revisions within fifteen (15) calendar days of receipt. If the SHPO does not respond within fifteen (15) calendar days of receipt, the NPS will finalize the submission and proceed with the undertaking.
4. Initiation of the undertaking. The NPS may proceed with the undertaking once the draft documents have been reviewed and the NPS has addressed all SHPO comments in accordance with Stipulation II.B.2 and II.B.3 above.
5. Final copies of the photo documentation will be accessioned into the NPS museum collections and one copy of the photo documentation will be filed with the SHPO.

### C. Interpretation

1. Following construction, the NPS will develop an interpretive wayside to explain the historical context and significance of the Park's features associated with Operation Outdoors: Lower Lehman Creek Campground, Wheeler Peak Scenic Drive, and Wheeler Peak Campground. The wayside will include an interpretive panel describing:
  - a. How the features were planned and developed within Humboldt National Forest as part of the United States Forest Service's Operation Outdoors program, initiated in 1957.
  - b. How the Forest Service and the NPS developed plans to address needed facility updates and expanded visitor amenities to meet increased recreational demands.
  - c. How the NPS's Mission 66 program, established in 1955 as a systematic approach to modernize visitor facilities in national parks, is analogous to Operation Outdoors.
2. The NPS will submit draft digital copies of the proposed interpretive panels to the SHPO for review and comment. The SHPO will have thirty (30) calendar days from the date of receipt to conduct the review and submit comments unless otherwise negotiated. If the SHPO fails to respond within the thirty (30) calendar day time period, the NPS may finalize the photo documentation.
3. The NPS will address all SHPO comments on the draft documents and submit revisions to the SHPO for review and comment. The SHPO will review the revisions within fifteen (15) calendar days of receipt. If the SHPO does not respond within fifteen (15) calendar days of receipt, the NPS will finalize the submission and proceed with the undertaking.

The NPS will ensure that the wayside and all interpretive media will be fully compliant with the Architectural Barriers Act Accessibility Standard.

#### **V. Duration**

This MOA will expire if its terms are not carried out within five (5) years from the date of its execution. Prior to such time, the NPS may consult with the SHPO to reconsider the terms of the MOA and amend it in accordance with Stipulation VIII below.

#### **VI. Post-Review Discoveries**

If during construction previously unknown historic properties are discovered or if unanticipated effects on historic properties occur within the APE after the undertaking activities have been initiated, all work in the immediate vicinity of the discovery or unanticipated effect shall be halted and the procedures of 36 CFR § 800.13 followed. In the event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, the regulations implementing the Native American Graves Protection and Repatriation Act (43 CFR Part 10) shall be followed.

#### **VII. Dispute Resolution**

Should either signatory to this MOA object at any time to any actions proposed or the manner in which the terms of the MOA are implemented, the NPS and the SHPO will consult to resolve the objection. If the NPS determines that such objection cannot be resolved, the NPS will:

- A. Forward all documentation relevant to the dispute, including the NPS's proposed resolution, to the ACHP. The ACHP shall provide the NPS with its advice on the resolution of the objection within thirty (30) calendar days of receiving adequate documentation. Prior to reaching a final decision on the dispute, the NPS will prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP, and the SHPO and provide them with a copy of this written response. The NPS will then proceed according to its final decision.
- B. If the ACHP does not provide its advice regarding the dispute within the thirty (30) calendar day time period, the NPS may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, the NPS will prepare a written response that takes into account any timely comments regarding the dispute from the SHPO and provide the SHPO and the ACHP with a copy of such written response.
- C. The NPS's responsibility to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute remain unchanged.

#### **VIII. Amendments**

The MOA may be amended when such an amendment is agreed to in writing by the signatories. The amendment shall be effective on the date a copy signed by all the signatories is filed with the ACHP.

### **IX. Termination**

If either signatory to the MOA determines that its terms will not or cannot be carried out, that party shall immediately consult with the other signatory to attempt to develop an amendment per Stipulation VIII, above. If within thirty (30) days (or another time period agreed to by all signatories) an amendment cannot be reached, either signatory may terminate the MOA upon written notification to the other signatory.

Once the MOA is terminated, and prior to work continuing on the undertaking, the NPS must either (a) execute an MOA pursuant to 36 CFR § 800.6 or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR § 800.7. The NPS will notify the SHPO as to the course it will pursue.

### **X. Anti-Deficiency Act**

The NPS's obligations under this MOA are subject to the availability of appropriated funds, and the stipulations of this MOA are subject to the provisions of the Anti-Deficiency Act (31 USC Section 1341). The NPS will make reasonable and good faith efforts to secure the necessary funds to implement this MOA in its entirety. If compliance with the Anti-Deficiency Act alters or impairs the NPS's ability to implement the stipulations of this MOA, the NPS will consult in accordance with the amendment and termination procedures found in Stipulations VIII and IX of this agreement.

EXECUTION of this MOA by the NPS and the SHPO and implementation of its terms evidence that the NPS has taken into account the effects of this undertaking on historic properties and has afforded the ACHP an opportunity to comment on the undertaking and its effect on historic properties.

This MOA may be executed in counterparts, each of which shall constitute an original, and all of which shall constitute one and the same agreement.

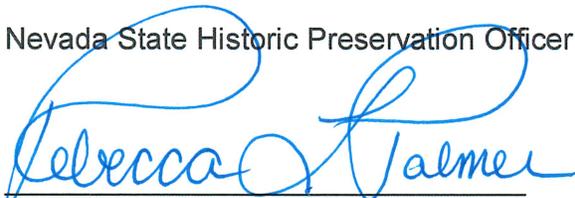
**SIGNATORIES**

National Park Service

  
James Woolsey  
Superintendent, Great Basin National Park

Date: 11/14/2022

Nevada State Historic Preservation Officer

  
Rebecca L. Palmer  
Nevada State Historic Preservation Officer

Date: 11/17/2022

## APPENDIX I –THE UNDERTAKING

The Bristlecone Recreation Area was constructed in the 1990's and is at the terminus of the Wheeler Peak Scenic Drive. The area is a day-use site for parking, picnicking, and hiking with access to eight different trails through the Park's high altitude sub-alpine environment. The Summit Trailhead was constructed in the 1960's under the United States Forest Service (USFS) Operation Outdoors program and is located 0.5 miles from the terminus of the Wheeler Peak Scenic Drive. The area is also a day-use site for parking with access to eight different trails through the Park's high altitude sub-alpine environment. The proposed work at the Bristlecone Recreation Area and Summit Trailhead would include the following elements:

- Repurposing the underutilized amphitheater into an accessible recreation day-use picnic area.
- Upgrading trailhead signage, wayside exhibits, and kiosks to Architectural Barriers Act Accessibility Standards (ABAAS) with multilingual signage and text.
- Reconfiguring the parking areas to comply with ABAAS.
- Refurbishing the trailhead for the Summit Trailhead and the half mile Accessible Island Forest Nature Trail to improve access, stabilize steep grades, and resolve drainage issues.
- Installing a new water line to the recreation area to meet the requirements of the Nevada Division of Environmental Protection (NDEP).

The Lower Lehman Campground was first constructed in 1955 by the USFS and later improved upon under the USFS Operation Outdoors program in the 1960's. The Lower Lehman campground is the first campground available to visitors on their drive along Wheeler Peak Scenic Drive, and it is the only campground in the Park open year-round. In addition, the campground is sought out for its recreational vehicle (RV) accessibility with six pull-through sites.

The proposed work at the Lower Lehman Campground includes rehabilitation of the existing campground, expansion of the campground to add new sites and a vault toilet, replacement of the existing waterline with a new waterline, and reconfiguration of the campground entrance from Wheeler Peak Scenic Drive. The project components are shown in the enclosed design development drawings.

Of the eleven existing campsites, nine would be retained, including three existing 25- to 45-foot back-in sites and five existing 30- to 52-foot pull-through sites. The existing accessible back-in campsite (campsite #1) would be improved with an asphalt parking pad and concrete use area to meet the requirements of ABAAS. One additional back-in campsite (the host site) would be added to the existing road, on the west side near the campground exit. Campsite #11 would be removed to make room for the road leading to the campground expansion, described below.

Campsite #7, which was originally constructed in a wetland area, would be removed, and restored to wetlands. Restoration of campsite #7 would consist of removing all

infrastructure and nonnative fill, contouring the site to match existing natural grade, and reseeding or planting with native vegetation as needed.

The fee station and trailhead would be improved to match the Upper Lehman Campground fee station, including an asphalt pull-off. Additional improvements at the fee station/trailhead would include a kiosk, iron ranger, and trailhead signage with new interpretive displays. The trail connecting to Upper Lehman Campground would remain in place with only minor grading improvements at the trailhead.

Additional improvements to the existing Lower Lehman Campground would include:

- New campsite furnishings would be installed at each site, including a picnic table, fire pit with grill, and site marker.
- Existing culverts in and around the campground would be either cleaned and flushed of sediment and debris or removed and replaced. Riprap would be placed at the inlet and outlet sides of the culverts.
- A slurry seal (mixture of water, asphalt emulsion, aggregate, and additives) would be applied to the existing campground road.

Eleven new campsites would be constructed in an undeveloped area just west and east of the existing campground road, bringing the total number of campsites at Lower Lehman Campground to 20, including the host site and two accessible campsites. The new campsites would include two 30-foot back-in sites, four 40-foot back-in sites, one 45-foot back-in site, three 50-foot back-in sites, and one accessible 40-foot pull-through site. Site furnishings would include a fire ring, picnic table and campsite marker at each campsite, as described above for the existing campground. The host site would have a sewer vault, water hookup, and propane tank. Campsites would be located along a new one-way S-shaped road located east of the existing campground. Campers would enter the proposed expansion from the existing campground and exit via a new intersection onto Wheeler Peak Scenic Drive. The existing entrance and exit intersections at Wheeler Peak Scenic Drive would remain in place. Pedestrian routes, parking, vault toilet, signage, and campsites would be designed to meet ABAAS standards. Pedestrian circulation would be shared with cars via the campground road corridor.

The existing campground entrance from Wheeler Peak Scenic Drive would be reconfigured to allow better access for RVs or vehicles pulling campers and to improve safety. The campground entrance would be widened in place with asphalt to accommodate turning movements into the campground from the east and west.

One additional vault toilet would be constructed. This new accessible vault toilet would be located centrally in the proposed campground expansion area. Installation of the vault toilet would include subgrade preparation and construction of the structural foundation system. An accessible concrete parking area is proposed at the vault toilet for access with one van accessible parking stall and one standard parking stall.

A retaining wall ranging from 6 inches to 3 feet in height would be constructed in the expanded campground area at one campsite. The wall would reduce disturbance to vegetation and preserve existing trees for camper experience and privacy.

Stormwater culverts would be constructed to mitigate runoff from sheet flows through campsites and the new circulation road, where feasible. Culverts are generally proposed where broader areas of sheet flow would have the potential to concentrate and flow through campsites or portions of the circulation road.

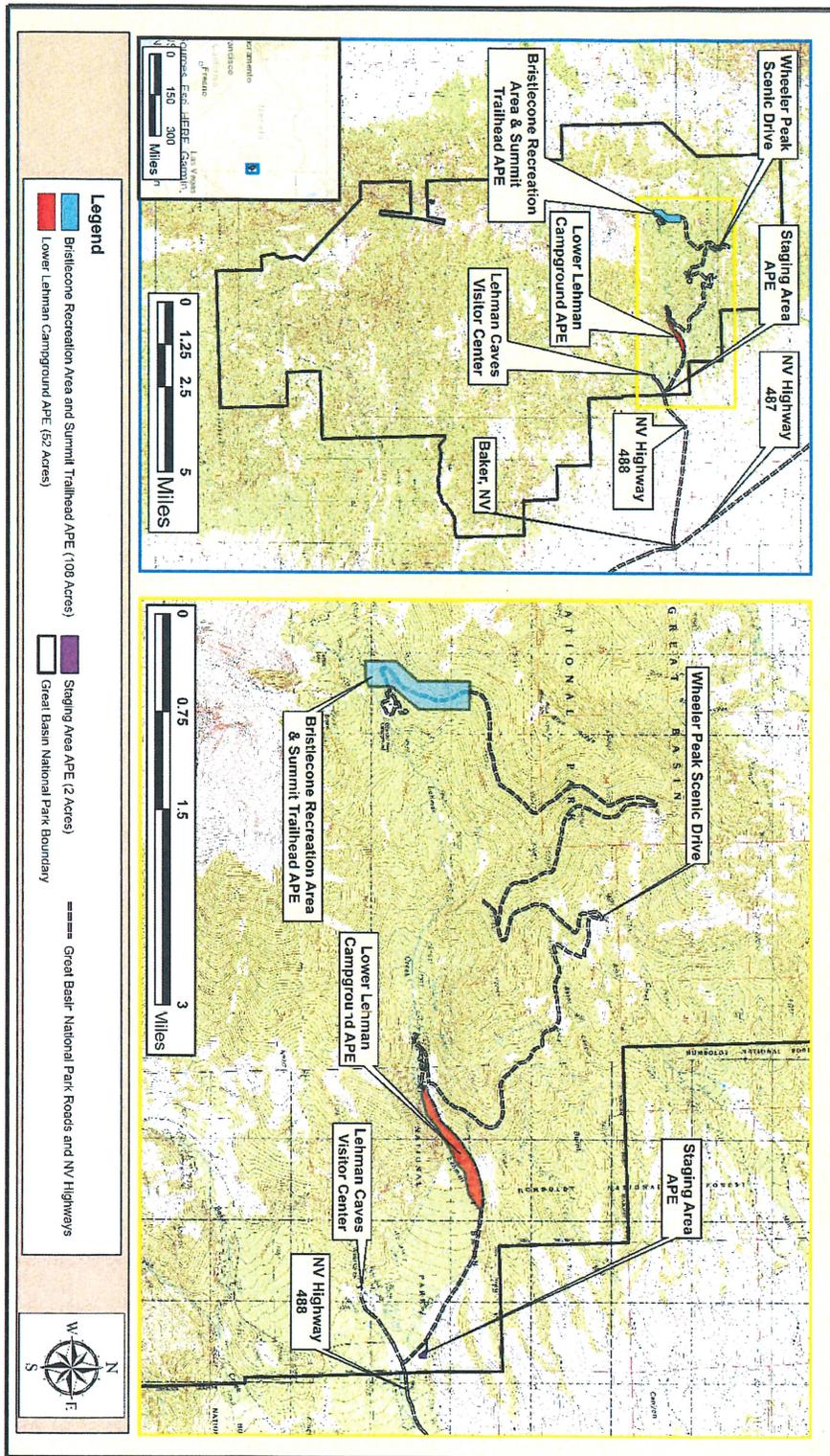
The existing water distribution system would be abandoned, and a new waterline installed. This work would include abandoning the existing waterline between Upper Lehman Campground and Lower Lehman Campground and abandoning the existing water distribution system at Lower Lehman Campground. A new 2-inch-diameter, approximately 4,100-linear-foot water main would be installed to replace the existing waterline. A new water distribution system with yard hydrants and associated appurtenances would be installed.

The water main alignment would connect to an existing water line located just outside of the Upper Lehman Campground and follow the south shoulder of Wheeler Peak Scenic Drive for 0.5 miles before turning south on the west side of the Lower Lehman Campground entrance. The surface disturbance during construction would be about four feet wide. Through the existing campground area, the water main alignment would follow the shoulder and edge of pavement of the existing circulation road before turning east toward the proposed vault toilet in the expanded campground area. Temporarily disturbed areas would be backfilled and restored with native vegetation following construction.

Existing yard hydrants or hose spigots would be removed and replaced with new yard hydrants fed from the extended distribution system. Four yard hydrants would be replaced and relocated in the campground area. The existing water distribution system in the campground area would also be abandoned in place and valves would be removed.

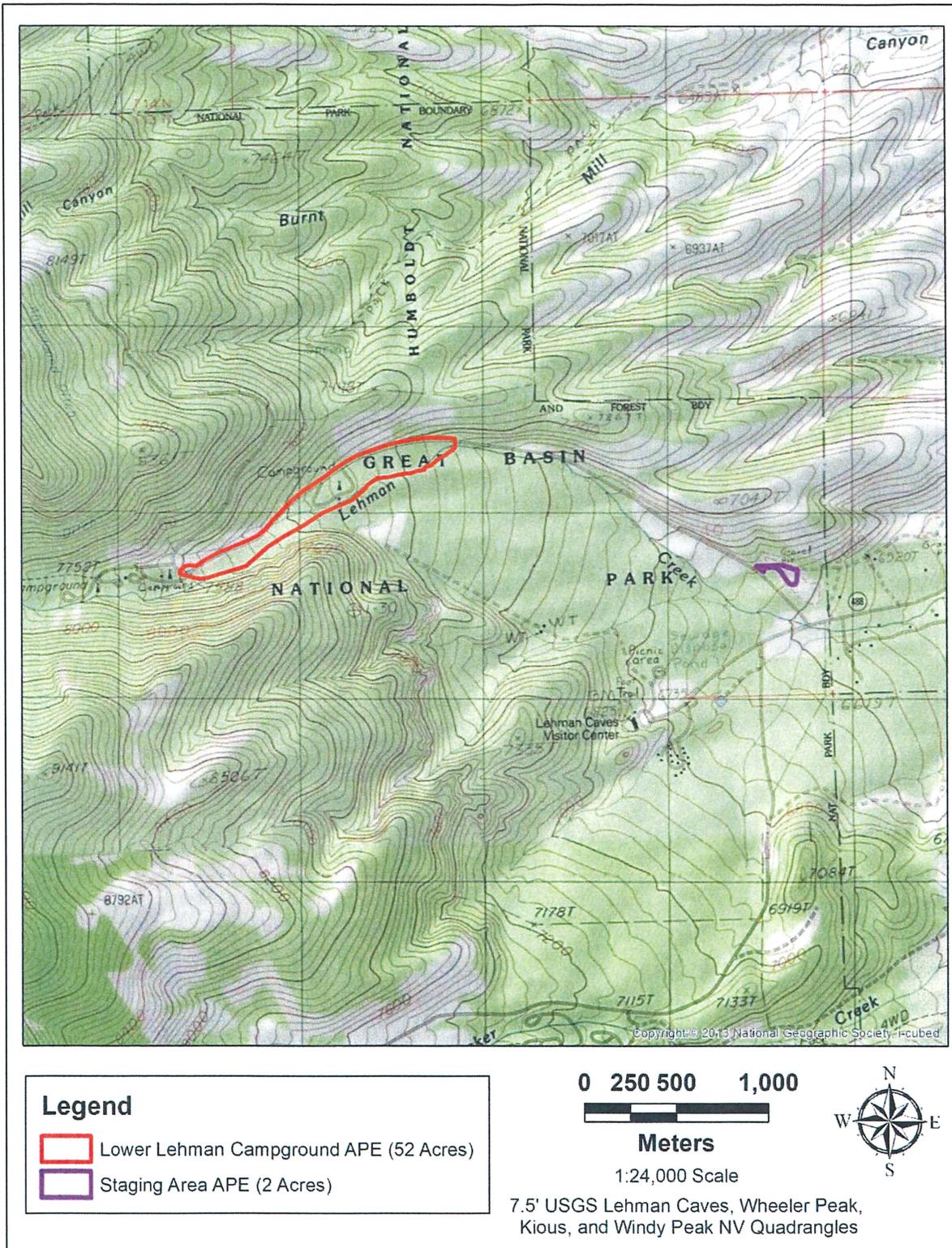
The new water main would be 2-inch High Density Polyethylene pipe with associated isolation valves and would include a 2-inch drainpipe for winterization of the system. To account for the approximate 250-foot elevation difference between Upper and Lower Lehman Campgrounds, a 2-inch pressure reducing valve would be installed near the entrance to Lower Lehman Campground.

## APPENDIX II – AREA OF POTENTIAL EFFECTS

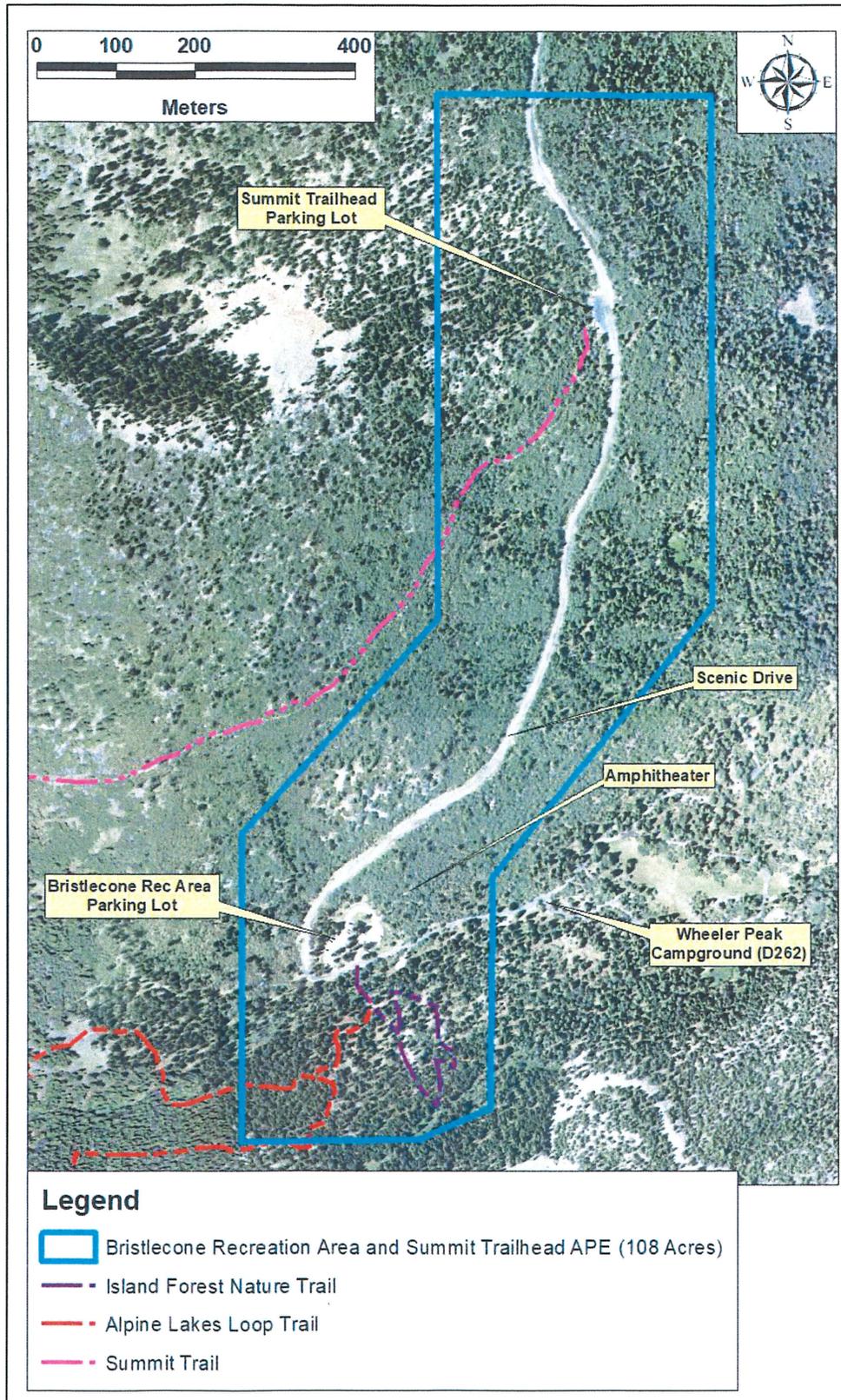


Memorandum of Agreement Regarding Rehabilitation of the Bristlecone Recreation Area and Summit Trailhead and the Lower Lehman Creek Campground at Great Basin National Park White Pine County (Undertaking #2022-7057)

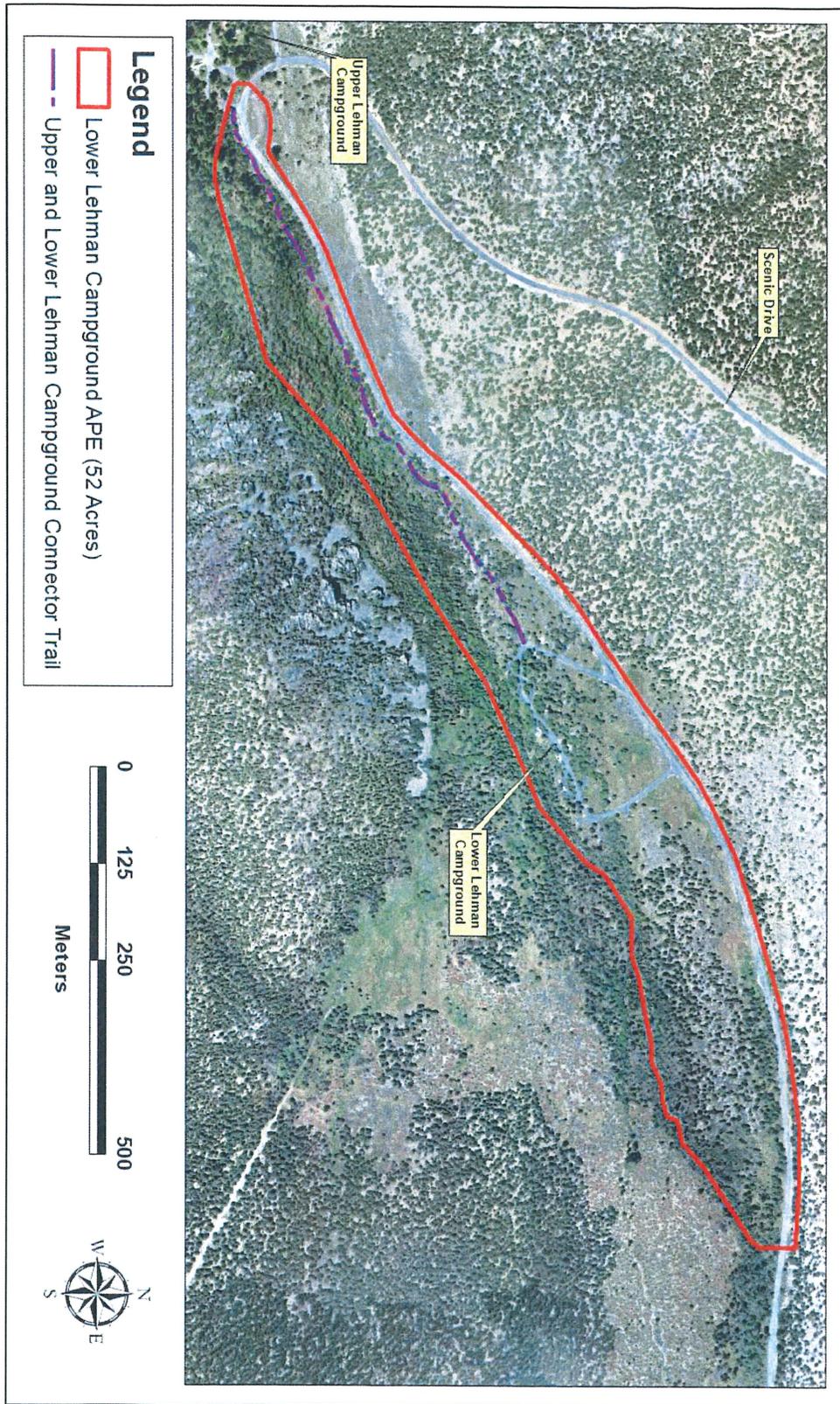




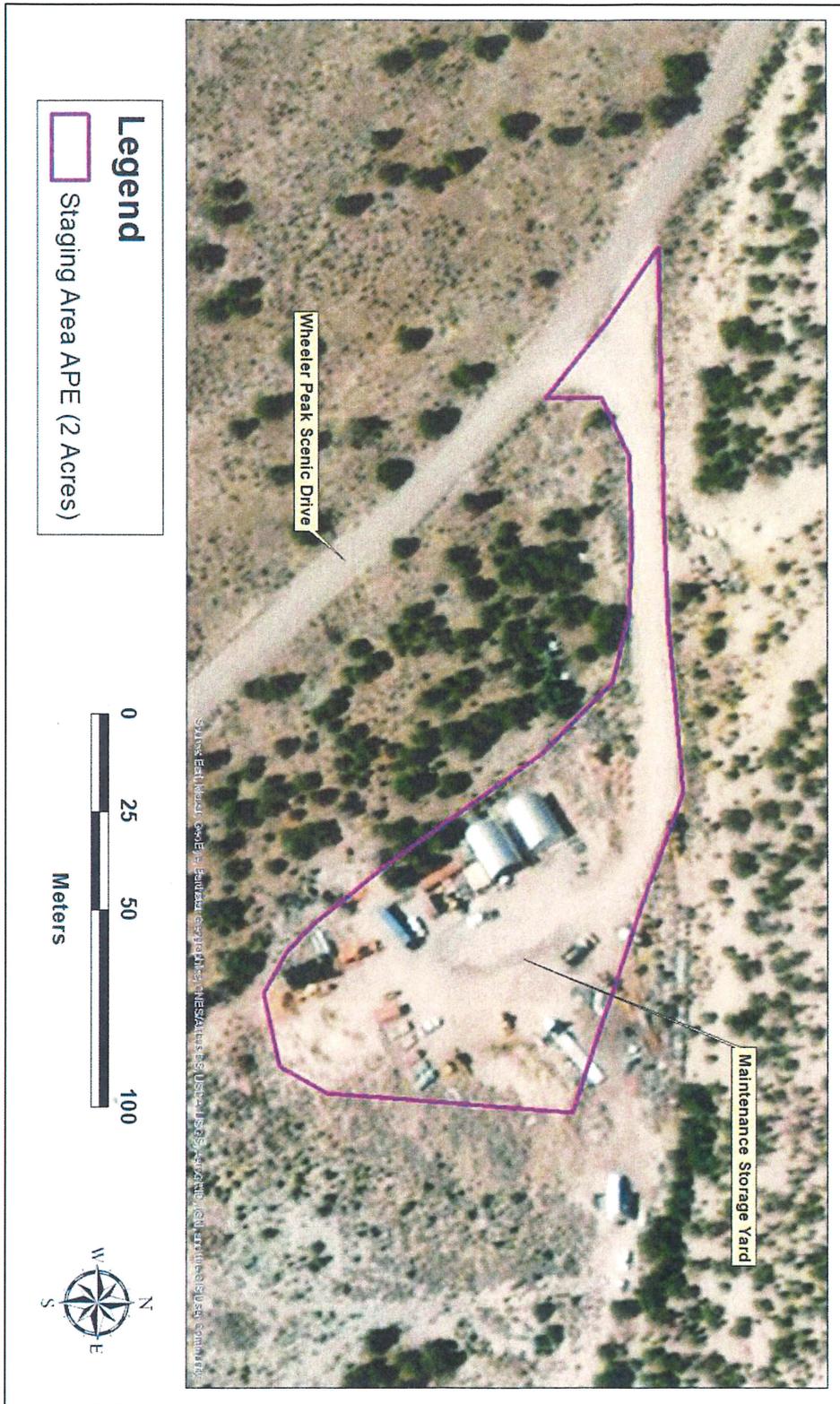
Memorandum of Agreement Regarding Rehabilitation of the Bristlecone Recreation Area and Summit Trailhead and the Lower Lehman Creek Campground at Great Basin National Park  
White Pine County (Undertaking #2022-7057)



Memorandum of Agreement Regarding Rehabilitation of the Bristlecone Recreation Area and Summit Trailhead and the Lower Lehman Creek Campground at Great Basin National Park White Pine County (Undertaking #2022-7057)



Memorandum of Agreement Regarding Rehabilitation of the Bristlecone Recreation Area and Summit Trailhead and the Lower Lehman Creek Campground at Great Basin National Park White Pine County (Undertaking #2022-7057)



**Appendix D:  
Errata Indicating Text Changes to EA**

# Appendix D: Errata

## Lower Lehman Creek Campground Expansion Environmental Assessment

### Great Basin National Park

### November 2022

#### Edits to the Environmental Assessment

This Errata indicates changes made after public and agency review of the Lower Lehman Creek Campground Environmental Assessment (EA).

The following changes are incorporated through these errata in the EA as noted below. EA text to be deleted is shown as ~~blue~~ and revised or new text is shown as *blue*.

#### Page 10, Affected Environment and Environmental Consequences – Issues Identified for Further Analysis

*Revised text:*

“...Historic Structures, Districts, and Cultural Landscapes; Vegetation *and Wetlands*; and Visitor Use and Experience were identified as resources that could be potentially impacted by the proposed action and further analysis was needed.”

Wetlands were added as an impact topic for the following reasons:

- Page 13 of the EA states “Existing wetlands in the project area would be avoided and would not be impacted during construction.”
- However, further refinement of the project design resulted in small changes that would result in impacts on wetlands in two locations from installation of the waterline and one location near the campground entrance.
- Although small in area and temporary, the National Park Service (NPS) determined that these impacts should be disclosed in the EA.

#### Page 12, Affected Environment and Environmental Consequences – Vegetation *and Wetlands* – Affected Environment

The section header “Vegetation” is replaced by “Vegetation *and Wetlands*.”

#### Page 13, Affected Environment and Environmental Consequences – Vegetation *and Wetlands* – Environmental Consequences

*Revised text:*

“...Overall, the project would affect less than 0.01 percent of the entire park’s vegetation

~~including wetlands. Existing wetlands in the project area would be avoided and would not be impacted during construction.~~ Vegetation *and wetland* impacts are summarized in Table 1 and shown on Figure 4 *and Figure 5.*”

#### Page 14 Affected Environment and Environmental Consequences – Vegetation *and Wetlands* – Environmental Consequences

*Revised text, insert after second paragraph:*

*“Construction of the waterline would require temporary disturbance of wetlands at two locations impacting 21.5 square feet of wetlands at the southern edge of the campground and about 27.6 square feet of wetlands at the southeastern edge of the existing campground (Figure 5). If reconfiguring the campground entrance is implemented, an additional 605 square feet of wetlands just west of the campground entrance would be permanently impacted (Figure 5). Wetland vegetation would be restored at the downstream site of the culvert and result in no net loss of wetlands. Restoration would consist of, in order of preference, natural re-vegetation, replanting, and seeding with native species. The analysis area for wetlands for the Lower Lehman Creek Campground includes about 1.58 acres of wetlands, of which about 0.015 acre (654 square feet) would be affected by the project. These impacts are excepted from the need to prepare a Wetland Statement of Findings under NPS Director’s Order 77-1, because disturbance to wetlands would be less than 0.1 acre and would result from installation of underground utility lines and maintenance, repair, or renovation of a currently serviceable facility, with minor changes to improve safety.*”

Restoration of wetlands at campsite #7 would restore about ~~0.02-acre~~ *700 square feet (0.016 acre)* of wetlands in an area that *currently falls within a developed* campsite. As previously described, restoration of campsite #7 would consist of removing all infrastructure and nonnative fill, contouring the site to match existing natural grade, and reseeding or planting with native vegetation as needed. Restoration of campsite #7 would result in a beneficial effect on vegetation by restoring a site that is currently impacted to a more natural state and creating new wetlands.

Overall, the proposed action would have long-term adverse effects from removal of up to 2.45 acres of vegetation during construction; however, most impacted areas (about 1.66 acres, 68%) would be restored with native vegetation after completion of construction, and invasive nonnative plant species would be controlled as described above. *The proposed action would have short-term adverse effects from disturbance of 0.015 acre of wetland vegetation.* The proposed action would also have a beneficial effect on vegetation from elimination of occasional vegetation disturbance for waterline repair and from restoration of previously impacted wetlands at campsite #7. When project impacts on up to 2.45 acres of vegetation, *including 0.015 acre of wetlands,* are combined with the effects of past, present, and future actions described above, overall impacts would continue to be long-term and adverse *from ongoing vegetation disturbance to maintain the waterline.*”

#### Page 15 Affected Environment and Environmental Consequences – Vegetation *and Wetlands* – Environmental Consequences

*Insert Figure 5 (below) after Figure 4.*

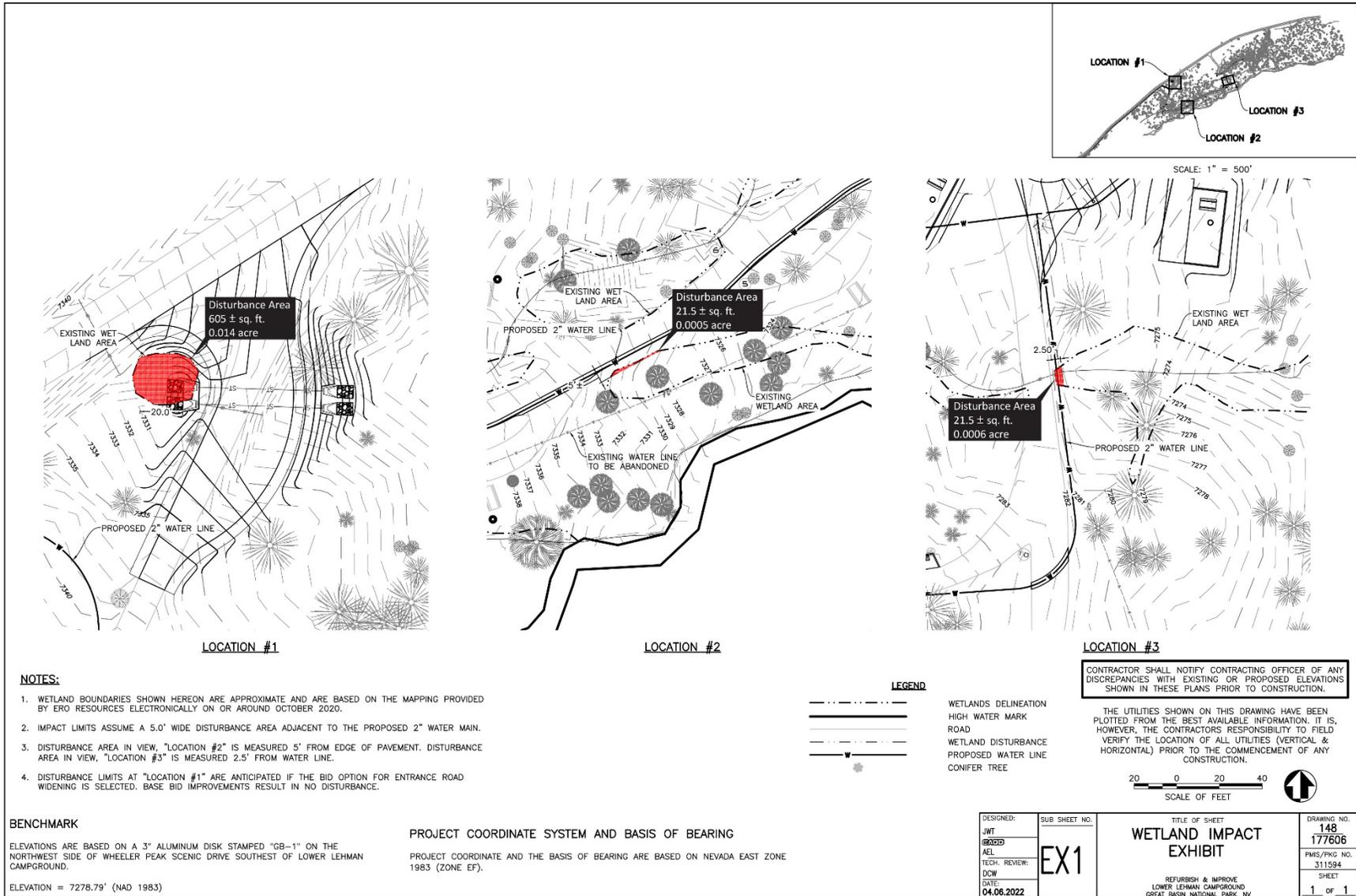


Figure 5. Lower Lehman Creek Campground wetland impacts.

**Appendix E:  
A Non-Impairment Determination**

# **Appendix E: Determination of Non-Impairment**

## **Lower Lehman Creek Campground Expansion Environmental Assessment, Selected Alternative**

### **Great Basin National Park**

#### **November 2022**

#### **Introduction**

By enacting the National Park Service (NPS) Organic Act of 1916 (Organic Act), Congress directed the U.S. Department of the Interior and the 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 United States Code 100101). Before approving a proposed action that could lead to an impairment of park resources and values, a NPS decision maker must consider the impacts of the proposed action and determine, in writing, that the activity will not lead to an impairment of park resources and values.

Sections 1.4.5 and 1.4.6 of NPS *Management Policies 2006* provide an explanation of impairment. Section 1.4.5 defines impairment as, "an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values." Section 1.4.5 goes on to state that, "an impact to any park resource or value may, but does not necessarily, constitute an impairment. An impact would be more likely to constitute 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, or
- 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.

An impact would be less likely to constitute an impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated."

Great Basin National Park's (park) enabling legislation, The Great Basin National Park Act of 1986, specifically determines this park's purpose and contains some general directions

for park operations. Fundamental resources and values for the park are identified in the park's General Management Plan, which was issued in 1993. The General Management Plan identifies the following exceptional resources at the park:

- Bristlecone pine forests
- Riparian areas and water quality
- Alpine/subalpine areas
- Federal- and state-listed threatened, endangered, protected, and sensitive plant and animal species
- Biological diversity
- Caves
- Glacial features
- Air quality
- Vistas
- Cultural resources

### **Non-Impairment Determination for the Selected Alternative**

Based on the identification and evaluation of impacts in the Lower Lehman Creek Campground Expansion Environmental Assessment (2022 EA), the following park resources and values were evaluated for impairment: vegetation and wetlands and the proposed Wheeler Peak Scenic Area historic district and associated historic properties and cultural landscapes.

Section 1.4.6 of *NPS Management Policies* 2006 identifies several park resources and values that are subject to evaluation in a non-impairment determination. Consistent with the September 2011 NPS Guidance for Non-Impairment Determinations and the NPS NEPA Process, non-impairment determinations do not include discussion of impacts on visitor experience, socioeconomics, public health and safety, environmental justice, land use, park operations, etc. as these do not constitute impacts on park resources and values identified through the NPS Organic Act or General Authorities Act that are subject to the non-impairment standard.

#### ***Vegetation and Wetlands***

As described in the 2022 EA, the selected alternative will result in the permanent loss of 0.79 acre of shrubland, grassland, and riparian woodland vegetation communities. About 1.66 acres of vegetation will be temporarily disturbed. Impacts on wetlands will be small, about 0.015 acre, and will be restored in place or immediately adjacent to the impact site with no net loss of wetlands. All temporarily disturbed areas will be revegetated with native species following construction as described in Appendix A, Mitigation and Best Management Practices of the EA. Because the current water system is buried beneath mature mountain mahogany, aspen, and pinyon pine trees in places, minor breaks and leaks often require disturbance to vegetation to repair. Abandoning the current waterline

in place will reduce the disturbance of vegetation required for periodic repairs to the pipeline, resulting in a long-term benefit to vegetation. Restoration of wetlands at campsite #7 will restore about 700 square feet (0.016 acre) of wetlands in an area that is currently a developed campsite. Restoration of wetlands at campsite #7 will result in a beneficial effect on vegetation by restoring a site that is currently impacted to a more natural state and creating new wetlands.

The only impacts on vegetation types identified as exceptional resources in the park will be from permanent loss of 0.03 acre of montane/subalpine riparian vegetation, 0.09 acre of temporary impacts on montane/subalpine riparian vegetation, and 0.015 acre of temporary and permanent impacts on wetlands. Bristlecone pine forests, alpine vegetation, and federal- and state-listed threatened, endangered, protected, and sensitive plant species will not be affected. The selected alternative's impacts on vegetation will not result in impairment of park resources or values because the impacts will be limited to a very small area of riparian vegetation and most impacts will be mitigated.

### ***Historic Structures, Districts, and Cultural Landscapes***

As described in the 2022 EA, the project will result in an adverse effect on the Wheeler Peak Scenic Area historic district. Implementing the selected alternative will result in adverse effects on Lower Lehman Creek Campground from introducing new nonhistorical elements that will detract from the historic design, setting, and feeling of the existing campground by introducing a new visual element. The campground expansion will alter the historical design of the existing campground by adding new ingress from the existing campground circulation pattern, widening the ingress, rehabilitating a campsite to improve accessibility, adding an asphalt pull-off parking area, removing a campsite to improve wetlands, and removing a campsite to construct ingress to the campground expansion. However, the design of the campground expansion will be similar to the historical Operation Outdoors design principles, including the use of herringbone-type campsite layout and pull-throughs. The project will also affect the historic setting and feeling of the proposed Wheeler Peak Scenic Area historic district and cultural landscape by introducing a new visual element.

To ensure appropriate treatment of historic properties, the NPS and Nevada State Historic Preservation Officer signed a memorandum of agreement (MOA) with stipulations on November 17, 2022, for the treatment of historic properties that may be adversely affected by project implementation. Although the selected alternative will introduce new nonhistorical elements that adversely affect contributing elements to the Wheeler Peak Scenic Area historic district, these impacts will be mitigated through the implementation of measures identified in the MOA. The proposed Wheeler Peak Scenic Area historic district will remain intact and will still be eligible for listing in the National Register of Historic Places. The measures identified in the MOA will help ensure that the integrity of the historic district is not adversely affected to the extent that it will diminish the eligibility of the individual structures or the historic district as a whole for listing in the National

Register of Historic Places and will not result in impairment to the park resources and values that comprise the Wheeler Peak Scenic Area historic district.

### **Summary**

The NPS has determined that implementation of the selected alternative will not constitute an impairment of the resources or values of the park. This conclusion is based on a thorough analysis of the environmental impacts described in the 2022 EA and appendices, relevant scientific studies and resource reports, and the professional judgment of the decision maker guided by the direction in *NPS Management Policies 2006*. The selected alternative will not result in major adverse impacts on a resource or value, the conservation of which is (1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the park's General Management Plan or other relevant NPS planning documents.