

## **FINDING OF NO SIGNIFICANT IMPACT**

### **Las Vegas Wash Flow Regulation Environmental Assessment**

**April 2013**

Lake Mead National Recreation Area  
Clark County, Nevada

### **PURPOSE AND NEED**

Las Vegas Wash is experiencing significant channel erosion from perennial flows of stormwater and wastewater effluent from the Las Vegas Valley. Scouring of the channel poses a threat to the stability of the bridge that crosses over the Wash on Northshore Road. In addition, the sediment generated by this erosion is deposited into Lake Mead at Las Vegas Bay, compromising water quality. In the mid-nineties, check dams were constructed in the wash channel, but they were of insufficient size and failed shortly after their installation. In 2002, three grade control structures were constructed in the Wash within the park boundary to slow the flow of the Wash and dissipate some of the energy responsible for the erosion. Continued high flows, along with the rapid and significant drawdown of Lake Mead, have exacerbated the problem, and the three structures are no longer sufficient. The structure furthest downstream is being undermined and has been temporarily repaired. Failure of this structure would eventually cause failure of the two other structures upstream from it, posing a major threat to the foundation of the bridge and eventually to the Lake Las Vegas Dam and outlet works.

The purpose of the proposed flow regulation in lower Las Vegas Wash is to protect the stability of the bridge that crosses over the Wash on Northshore Road and maintain access to the northern portions of the Recreation Area; to protect the integrity of the three existing grade control structures located downstream from the bridge; to protect Lake Las Vegas Dam and outlet works; and to reduce sedimentation and improve water quality flowing into Lake Mead. An environmental assessment was prepared, analyzing a proposal to construct up to six new grade control structures as well as the No Action alternative.

### **SELECTED ACTION**

The Selected Action is Alternative B, which was identified and analyzed in the EA as the Management-preferred Alternative. No changes have been incorporated into the Selected Action as a result of public comment. Under Alternative B, up to six new grade control structures will be built downstream from the existing structures. Construction will be implemented in phases, with structures built as necessary. The need for the structures will depend significantly on future water levels in Lake Mead, which influences the rate of degradation in the Wash. If the observed recent rate of degradation continues, the grade control structures will need to be constructed at a

rate of approximately one every five years. The first of these (Structure 4) will be constructed approximately 1,000 feet downstream of the existing third structure, followed by Structures 5 through 9 spaced 2,000 to 3,000 feet apart. The grade control structures would consist of sloping riprap structures bounded by sheet pile cutoff walls, which have been used successfully further upstream.

Construction access into the Wash will be from Northshore Road, using the same road that was used to build Grade Control Structure No. 3, or from the Las Vegas Bay launch ramp, which is just downstream from the terminal structure. Once in the Wash, an access road will be built on the sand/gravel benches on either side of the channel. The road will have a total width of 20 feet, comprised of a 12-foot driving surface and two 4-foot ditches. Turnarounds and pull-offs will be included. Several low-water crossings will be needed to accommodate the meandering channel alignment. Since this road will be located in an active wash, it will be susceptible to the effects of erosion and channel migration, so maintenance or reconstruction of this road will be initiated only when necessary to complete repairs on the grade control structures.

With regular maintenance, the grade control structures can function effectively for 50 to 100 years. Future maintenance of the grade control structures will consist of replacement or regrading of displaced riprap, placement of riprap or training features upstream of the structures to maintain favorable flow alignment, removal of vegetation that impedes normal flow or causes undesirable flow patterns, and minor road grading or repair.

## **ALTERNATIVES ANALYZED BUT NOT SELECTED**

In addition to the Selected Action (Alternative B: Construction of Grade Control Structures to Regulate Flows), the EA also analyzed the No Action Alternative. Under the No Action Alternative, no new stabilization measures would be implemented, and no additional grade control structures would be constructed. Flows in the lower Las Vegas Wash would not be further regulated. Existing management actions, such as periodic bridge inspection and maintenance and repair of the existing grade control structures, would continue under the No Action Alternative, but the effects of channel erosion would remain. High levels of sediment would continue to be transported from the Wash into Lake Mead, and the wash channel would continue to deepen and widen.

## **ALTERNATIVES CONSIDERED BUT DISMISSED**

In addition to the construction of additional grade control structures, other alternatives were also considered to maintain access across Las Vegas Wash. One option was to retrofit the bridge to withstand the 100 feet of scour that are predicted by hydraulic analyses and sediment transport models. However, due to the age of the structure and the depth of pier extension that would be required to accommodate full scour, retrofitting was found to be impractical. As a short-term option, the piles on which the piers sit could be extended, allowing them to take up the load as the existing piles lose their capability. Since this is not a long-term solution, this option was not considered further.

Another alternative was to replace the bridge with a new structure. Bridge replacement would require identifying feasible crossing locations along the Wash as well as feasible roadway realignment options. After constructing a new bridge and new roadway approaches, the existing structure and obsolete roadway segments would be removed. However, more favorable crossing locations could not be identified. Longer than normal bridge spans would be needed to cross the upper portion of the Wash to accommodate future degradation, while a significantly higher bridge is necessary near the lower end of the Wash to accommodate the maximum storage elevation in Lake Mead. In addition, both construction of a new bridge and the retrofit option presented above provide a solution for maintaining access across the Wash, but they do not address the risks to the Lake Las Vegas Dam and outlet works or the large amount of sediment that is being deposited into Lake Mead; thus, they do not fully meet the purpose and need.

## ENVIRONMENTALLY PREFERRED ALTERNATIVE

The environmentally preferred alternative is the alternative that will promote the National Environmental Policy Act (NEPA), as expressed in Section 101 of NEPA. This alternative will satisfy the following requirements:

- 1) Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
- 2) Assure for all generations safe, healthful, productive, and esthetically and culturally pleasing surroundings;
- 3) Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable or unintended consequences;
- 4) Preserve important historic, cultural, and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;
- 5) Achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities; and,
- 6) Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

The Council on Environmental Quality states that the environmentally preferable alternative is "the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources (46 FR 18026 – 46 FR 18038)." According to the NPS NEPA Handbook (*Director's Order #12*), through identification of the environmentally preferred alternative, the NPS decision-makers and the public are clearly faced with the relative merits of choices and must clearly state through the decision-making process the values and policies used in reaching final decisions.

Alternative B, the Selected Action, is the environmentally preferable alternative because overall it will best meet the requirements in Section 101 of NEPA. Alternative B calls for the construction of grade control structures that will allow the wash system to move toward an

equilibrium in which sediment inflows and outflows are balanced. By reducing erosion in the lower Las Vegas Wash, Alternative B will mitigate threats to the stability of the bridge, ensuring the safety of park visitors, employees, and others who travel on it. Protection of the bridge will ensure that access is maintained to a large portion of the Recreation Area. By reducing sediment outflow from the Wash, Alternative B will improve the quality of the water flowing into Lake Mead at Las Vegas Bay. By combating channelization and allowing for slower flows, Alternative B will support the establishment and expansion of wetland and riparian vegetation, resulting in improved habitat quality. Alternative B will provide benefits that relate to safety, visitor experience, and natural resource protection and thus is highly preferable to Alternative A, which would compromise human safety, degrade the visitor experience, and allow for continued impacts to park resources.

## MITIGATION AND MONITORING

Mitigation measures are specific actions designed to minimize, reduce, or eliminate impacts of alternatives and to protect Lake Mead NRA resources and visitors. The following table outlines mitigation measures that will be implemented under the Selected Action. (The NPS Monitor assignment concerns staff of the park's Environmental Compliance branch responsible for regularly inspecting projects during implementation, providing resource protection training, ensuring that mitigation measures are implemented as required, and monitoring post-project efficacy of mitigation strategies.)

Resource Area	Mitigation Measure	Responsible Party
Geology and Soils	Clearly delineate disturbance limits and restrict all activity to within these limits.	Contractor, with oversight by NPS Monitor
	Obtain all fill and topsoil from the local project area.	Contractor, with oversight by NPS Monitor
	Rehabilitate staging areas by decompacting soil and restoring original contours.	Contractor, with oversight by NPS Monitor
Vegetation	Within the project area, remove exotic species and avoid disturbing native vegetation to the extent practicable.	Contractor, with oversight by NPS Monitor
	Salvage plants and topsoil from areas slated for disturbance for use in post-construction restoration.	NPS Vegetation Managers
	Pressure-wash all construction equipment prior to use to prevent the introduction and spread of non-native plant species.	Contractor, with inspection by NPS Monitor

Wildlife	Avoid construction activity during the nesting season to the extent practicable.	NPS Project Manager
	During the nesting season, conduct surveys for nesting birds and establish buffers around active nests.	NPS Biologist
Special Status Species	Conduct pre-construction survey for desert tortoise in upland staging and access areas.	NPS Biologist
	If seasonally appropriate, conduct southwestern willow flycatcher surveys in areas of potential habitat.	NPS Biologist
	Provide on-site training to all project personnel on the potential occurrence of special status species, explaining measures that all employees can take to protect them.	NPS Biologist
	If federally protected species are found within the project area, suspend all work and consult with the U.S. Fish and Wildlife Service to determine a course of action.	NPS Biologist
	Enforce a strict litter control program to avoid attracting opportunistic predators to the project area.	NPS Monitor
	Implement Nevada Department of Wildlife protocols for protecting banded gila monsters.	NPS Biologist
Water Quality	Use silt fencing or other erosion control measures around stockpiled fill material.	Contractor, with oversight by NPS Monitor
	Divert flows to create drier work areas contained from water courses.	Contractor, with oversight by NPS Monitor
	Ensure proper storage, use, and disposal of fuels and other chemicals.	Contractor, with oversight by NPS Monitor
Air Quality	Apply water to control dust in disturbed areas.	Contractor, with oversight by NPS Monitor
Cultural Resources	If previously undiscovered archaeological resources are found during construction, suspend all work and contact the Park Archaeologist to determine a course of action.	Contractor and NPS Monitor
Safety and Visitor Experience	Temporarily close portions of Las Vegas Wash and the access trail to prevent visitor conflicts with construction activities. Use adequate signage at all access points.	NPS Project Manager
	Upon completion of construction, restore equipment access route to create a suitable trail for visitor access into the Wash.	Contractor, with oversight by NPS Monitor

## **WHY THE SELECTED ACTION WILL NOT HAVE A SIGNIFICANT IMPACT ON THE HUMAN ENVIRONMENT**

The NPS used the NEPA criteria to evaluate whether the selected action will have a significant impact on the environment. As defined by 40 CFR 1508.27, significance is determined by examining the following criteria:

**1. Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts which require analysis in an environmental impact statement:** While the Selected Action results in minor adverse impacts to wildlife, air and water quality, and park operations, these impacts are temporary and offset by long-term beneficial effects, and are not significant enough to warrant analysis in an environmental impact statement.

**2. The degree to which public health and safety are affected:** The Selected Action protects the integrity of the Northshore bridge and improves water quality flowing into Las Vegas Bay, resulting in beneficial effects to public health and safety.

**3. Any unique characteristics of the area such as proximity to historic or cultural resources, wild and scenic rivers, ecologically critical areas, wetlands or floodplains:** The Selected Action will result in beneficial effects to wetlands and floodplains. Impacts to cultural resources are discussed in No. 8 below. There are no wild and scenic rivers or ecologically critical areas located within the project area.

**4. The degree to which impacts are likely to be highly controversial:** There were no highly controversial impacts identified during preparation of the EA or during the public review period.

**5. The degree to which the potential impacts are highly uncertain or involve unique or unknown risks:** No highly uncertain, unique, or unknown risks were identified during the preparation of the EA or during the public review period.

**6. Whether the action may establish a precedent for future actions with significant effects, or represents a decision in principle about a future consideration:** No significant adverse impacts were identified during preparation of the EA. Implementation of the Selected Action neither establishes a NPS precedent for future actions with significant effects, nor represents a decision in principle about a future consideration.

**7. Whether the action is related to other actions that may have individual insignificant impacts but cumulatively significant effects:** The EA analyzed impacts related to geology and soils, vegetation, wildlife, special status species, water resources, wetlands and floodplains, air quality, cultural resources, soundscapes, visual resources, park operations, and safety and visitor use and experience. As described in the EA, cumulative impacts were determined by combining the impacts of the Selected Action with identified impacts from other past, present, and reasonably foreseeable future projects and actions. Adverse impacts of the Selected Action are minor and short-term. These impacts are offset by long-term beneficial effects and do not result in cumulatively significant impacts to any of the resource topics analyzed.

**8. The degree to which the action may adversely affect historic properties in or eligible for listing in the National Register of Historic Places, or other significant scientific, archeological, or cultural resources:** There are no known cultural resources in the project area, an active wash that has been continually impacted by numerous cycles of degradation and aggradation.

**9. The degree to which an action may adversely affect an endangered or threatened species or its habitat:** The Selected Action is not likely to adversely affect federally protected species or critical habitat, and the U.S. Fish and Wildlife Service has concurred with this determination and all conservation measures proposed by the NPS.

**10. Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment:** The Selected Action violates no federal, state, or local environmental protection laws. The EA for Las Vegas Wash Flow Regulation was prepared using the guidelines detailed in *NPS Management Policies 2006* and *Director's Order #12*, and the Selected Action meets all NPS requirements.

## **PUBLIC INVOLVEMENT AND AGENCY CONSULTATION**

### Scoping

A 30-day public scoping period occurred from April 24 to May 30, 2012. A scoping press release was sent to area media and was also posted on the Lake Mead NRA internet website, on the NPS Planning, Environment, and Public Comment (PEPC) internet website, and in the lobby of the Lake Mead Visitors Center. The Las Vegas Review Journal published a story on the proposal on May 2, 2012. Park staff also presented the proposed project at a meeting of the Las Vegas Wash Coordination Committee on July 24, 2012. The Las Vegas Wash Coordination Committee submitted a comment letter during the scoping period, expressing its support for the project.

### Agency Consultation and Permitting Requirements

On June 18, 2012, representatives from the National Park Service, U.S. Fish and Wildlife Service, Nevada Department of Wildlife, and Bio-West environmental consultants met at Las Vegas Wash to review the project and its potential effects on federally listed species. As a result of that meeting, the NPS initiated consultation with the Fish and Wildlife Service under Section 7 of the Endangered Species Act, a process which was completed on October 12, 2012 with a determination that the project was not likely to adversely affect federally threatened or endangered species.

Prior to construction, the contractor will obtain a Clark County Dust Control Permit, a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers, and a Construction Stormwater Permit from the Nevada Division of Environmental Protection.

### Public Review and Comments

On February 28, 2013 a press release announcing a 30-day public review period for the environmental assessment was sent to television stations, newspapers, magazines, and radio stations in Las Vegas, Henderson, Boulder City, Pahrump, Overton, Logandale, Laughlin, Nevada; Meadview, Kingman, Phoenix, and Bullhead City, Arizona; and Needles and Los Angeles, CA. The Henderson Press published the information on March 6. The announcement was also displayed at the Alan Bible Visitors Center. Additional notification was posted on the Lake Mead NRA website and on the PEPC website.

Lake Mead NRA's mailing list is comprised of 247 entities including federal, state, and local agencies; tribes; individuals; businesses; libraries; and organizations. The environmental assessment was distributed 36 individuals, agencies, and organizations likely to have an interest in this project. Entities on the park mailing list that did not receive a copy of the environmental assessment received a letter notifying them of its availability and methods of accessing the document.

The environmental assessment was published on the Lake Mead NRA website at (<http://www.nps.gov/lake>) and on the NPS PEPC website at <http://parkplanning.nps.gov/>. Copies of the environmental assessment were available at area libraries, including: Boulder City Library, Clark County Community College (North Las Vegas), Clark County Library, Las Vegas Public Library, Green Valley Library (Henderson), James I. Gibson Library (Henderson), Sahara West Library (Las Vegas), Mohave County Library (Kingman, AZ), Sunrise Public Library (Las Vegas), University of Arizona Library (Tucson, AZ), University of Nevada Las Vegas James R. Dickinson Library, Meadview Community Library, Moapa Valley Library (Overton, NV), Mesquite Library, Mohave County Library (Lake Havasu City, AZ), Laughlin Library, Searchlight Library, and Washington County Library (St. George, UT).

Public comments were accepted through April 4, 2013. Seven correspondences were received:

- The U.S. Fish and Wildlife Service submitted a comment confirming that Section 7 consultation had been completed and that no other effects to listed species were identified during their review of the EA.
- The Nevada State Historic Preservation Office submitted a comment supporting the EA as written.
- The Bureau of Reclamation sent a letter stating that they had no comments on the EA but requesting to be kept informed of activities in and near the project area.
- The Nevada Department of Wildlife was supportive of the proposed action and recommended measures to protect banded gila monsters; these measures have incorporated into the project's mitigation.
- A letter sent by the Sierra Club addressed multiple topics, including the potential for trail upgrades, possible recreational impacts, mitigation, and future management strategies. Although some of the comments were outside the scope of the EA, a response has been prepared, clarifying certain details of the Selected Action and the environmental changes that are expected.
- The Las Vegas Wash Coordination Committee sent a letter expressing support for the project and sharing knowledge obtained through their completion of similar projects upstream from the project area.



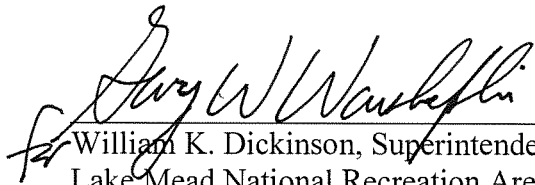
- An unnamed individual was supportive of the project, suggesting a refinement not substantially different from the proposed action.

## CONCLUSION

Based on the analysis completed in the EA, the capability of the mitigation measures to reduce, avoid, or eliminate impacts, and with due consideration of minimal public response and future agency coordination, the National Park Service has determined that the Selected Action does not constitute an action that normally requires the preparation of an environmental impact statement. In addition, a Determination of Non-Impairment is attached.

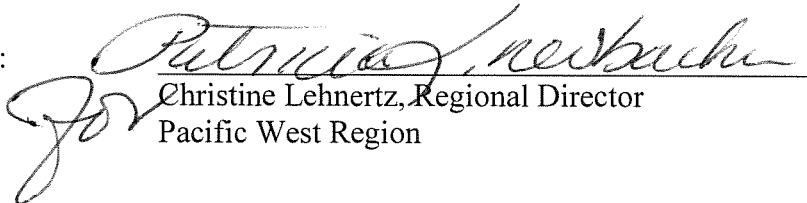
Negative environmental impacts that could occur are minor in effect. There are no unmitigated adverse impacts on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, known ethnographic resources, or other unique characteristics of the region. There are no significant impacts to the affected environment. There are no highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence identified. Implementation of the Selected Action would not violate any federal, state, or local environmental protection law. Therefore, in accordance with the National Environmental Policy Act of 1969, and regulations of the Council on Environmental Quality (40 CFR 1508.9), an environmental impact statement will not be prepared for this project, and the Selected Action may be implemented as soon as practicable.

Recommended:

  
\_\_\_\_\_  
William K. Dickinson, Superintendent  
Lake Mead National Recreation Area

4/10/13  
Date

Approved:

  
\_\_\_\_\_  
Christine Lehnertz, Regional Director  
Pacific West Region

4/22/13  
Date

# **DETERMINATION OF NON -IMPAIRMENT**

## **LOWER LAS VEGAS WASH FLOW REGULATION**

### **Lake Mead National Recreation Area**

While Congress has given the National Park Service (NPS) management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the NPS 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 NPS and 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.

The impairment of park resources and values may not be allowed by the NPS unless directly and specifically provided for by legislation or by the proclamation establishing the park. The relevant legislation or proclamation must provide explicitly (not by implication or inference) for the activity, in terms that keep the NPS from having the authority to manage the activity so as to avoid the impairment.

The impairment that is prohibited by the Organic Act and the General Authorities Act is 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. Whether an impact meets this definition depends on the particular resources and values that would be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts.

An impact to any park resource or value may, but does not necessarily, constitute 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 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. An impact that may, but would not necessarily, lead to impairment could result from visitor activities, NPS administrative activities, or activities undertaken by concessioners, contractors, and others operating in the park. Impairment could also result from sources or activities outside the park.

continually disturbed by the Wash's variable flows, so this will be a short-term temporary impact.

There will be no impairment of geology or soil conditions as a result of implementing the Selected Action. The Selected Action will result in long-term beneficial effects to geology and soil conditions by reducing erosion and stabilizing 3.5 miles of Las Vegas Wash.

### **Vegetation**

Under the Selected Action, some vegetation will be removed to create an access road and to construct the grade control structures. However, most of the vegetation along the bank where the road will be constructed is non-native tamarisk, and its removal will be a beneficial effect. In-stream vegetation is sparse due to the current conditions. Following construction, the slower flowing, less channelized stream will support greater amounts of native wetland vegetation along the banks and in the backwaters of the lower portion of the Wash. In addition, the grade control structures themselves will provide a platform for the establishment of riparian and wetland vegetation within the crevices of the rock.

There will be no impairment of vegetation as a result of implementing the Selected Action. Within the localized project area, the reduction in tamarisk and corresponding increase in native riparian and wetland vegetation will result in long-term beneficial effects.

### **Wildlife**

Under the Selected Action, wildlife will be negatively affected in the short-term by construction activities. Although steps will be taken to prevent the destruction of active bird nests, the use of heavy equipment could cause a flight response by birds and other wildlife in the immediate project area. Short-term impacts to water quality during construction will negatively affect fish and other aquatic life. Following construction, long-term improvement in habitat quality will benefit wildlife. Greater amounts of native wetland and riparian vegetation will be available for nesting birds. Multiple species will use the vegetation as a source of forage material and cover. Improved water quality will benefit aquatic life and all species that feed or drink from the Wash.

There will be no impairment of wildlife as a result of implementation of the Selected Action. Although construction activity will result in short-term minor impacts, the long-term improvements in habitat quality will result in beneficial effects to wildlife.

### **Special Status Species**

Under the Selected Action, access to the Wash will be via upland routes located in potential desert tortoise habitat. However, all access and staging areas are previously disturbed, and no new disturbance will occur in desert tortoise habitat. If a tortoise moves into the staging or access area and is unnoticed, it could be harmed by moving vehicles or equipment, but this is unlikely as no tortoise sign was observed in these areas. Personnel will be trained in how to respond if a tortoise is found in or near the project area.

The project area does not provide suitable nesting habitat for the southwestern willow flycatcher, so the species will only occur in the project area as a migrant, if at all. Nonbreeding individuals

There will be no effect to air quality from the project once construction is complete, and impacts during construction will be minor. There will be no impairment of air quality as a result of implementation of the Selected Action because it generates dust and exhaust during construction periods only, and only in the localized project area which is not heavily used.

### **Cultural Resources**

Under the Selected Action, up to six new grade control structures will be built in the Wash. The excavation needed for the placement of riprap is be shallow and therefore will not disturb original sediment that could contain cultural resources. Sheet piles to support the structures will be driven into the ground to a depth of approximately 25 feet, but impacting buried cultural resources is highly unlikely, and there will be no impairment of cultural resources as a result of implementing the Selected Action.

### **Soundscapes**

Under the Selected Action, soundscapes will be impacted by construction activities. Noise will be generated by the vehicles hauling materials to the project site and by the equipment used to build the structures. There will be no effects to soundscapes from the project once construction is complete. Noise will be generated during construction periods only, and only in the localized project area which is not heavily used. Therefore, there is no impairment of soundscapes as a result of implementing the Selected Action.

### **Visual Resources**

Under the Selected Action, additional grade control structures will regulate flow down the lower portion of Las Vegas Wash, which in turn will affect the amount and type of vegetation supported in the project area. Whether this represents a positive or negative change in the visual appearance of the habitat may be subjective, but increased wetland habitat is generally considered desirable within a harsh desert setting. The Selected Action will also introduce human-made structures into an area where they do not currently exist, but the structures are created of large rock and will ultimately be able to support emergent vegetation, helping them blend into the environment. These changes will ultimately be small relatively to the surrounding landscape, so there is no impairment of visual resources as a result of implementing the Selected Action.

### **SUMMARY**

As described above, adverse effects and environmental impacts anticipated as a result of implementing the Selected Action on 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 as significant in the park's general management plan or other relevant NPS planning documents, would not rise to levels that would constitute impairment of park values and resources.