National Park Service
U.S. Department of the Interior
San Antonio Missions National Historical Park
San Antonio, Texas

Finding of No Significant Impact

Rancho de las Cabras

Enhance Visitor Services and Rehabilitate the Cultural Landscape

Background

In compliance with NEPA, the National Park Service (NPS) prepared an Environmental Assessment (EA) to examine various alternatives and environmental impacts associated with the proposal to make improvements at the Rancho de las Cabras (Rancho), a 99-acre site that is a remnant of the Mission Espada ranchlands. The proposed improvements include a visitor contact station, new trails, and the rehabilitation of the cultural landscape.

The property is significant in the areas of American history, agriculture, archeology, and culture. The Rancho de las Cabras site contains the only physical remains of the Ranchos used to raise livestock for each of the missions, in this case Mission Espada. This includes remains of the walls of a fortified compound and interior rooms standing underneath mounds of protective sand set in an undeveloped landscape. The Rancho therefore provides a unique opportunity to interpret this integral and important aspect of the region's mission complexes. The Rancho is also an excellent location to tell the story of the frontier ranches established during the Spanish colonial period that served as the entry point for cattle ranching in this country and helped to establish the American tradition of cowboys, ranches, and trail drives.

Since 1995, when the site was added to the park, NPS has been involved in the planning necessary to properly protect the site's historic resources, and to provide appropriate interpretation of and visitor access to the property. This planning included General Management Plan amendments and a cultural landscape report. The documents provided broad directions for the management of the park and identified actions to improve the quality of both visitor and employee experience, as well as for the management and protection of the historic and natural resources of the park in order to allow NPS to meet current and future functional, maintenance, and management needs at the site, while protecting its resources.

At present, the current condition of the Rancho does not meet the goals, objectives, and recommendations as laid out in previous planning documents. Specifically, the lack of infrastructure, adequate visitor services, and historic landscape is a serious constraint on park operations and proper public use. There are no support facilities on the property. An unimproved entrance road provides the only vehicle access to the site, ending approximately one mile from the entrance at the county road to an informal parking area. The only current public use of the area consists of archeology field school activities, park sponsored events, and scheduled monthly guided tours that originate at nearby Floresville City Park on the San Antonio River. The current landscape surrounding the Rancho compound is dominated by invasive successional growth. This successional growth is not representative of historic conditions of the period of significance and may be made more suitable for public use.

Preferred and Environmentally Preferable Alternative

Alternative 2 is both NPS's preferred alternative and the environmentally preferable alternative because it best meets the purpose and need for the project as well as the planning goals and objectives by creating an appropriate level of the necessary infrastructure to provide each visitor an interesting, enriching, and informative experience in the park, enabling Rancho's history and significance to be explained; and the alternative will better restore the natural and cultural landscape in order to be more representative of historic conditions. For the most part, disturbance will be limited to areas of previously disturbed elements of the biological and physical environment, and most of the vegetation removal will result in beneficial effects to the environment by increasing biodiversity. Simply put, Alternative 2 best protects, preserves, and enhances historical, cultural, and natural resources of the site.

The improvements include realigning and finishing the entrance road with an all-weather surface, creating an all-weather 25 car parking area, and constructing an enclosed visitor contact station that will include a sitting area, restroom, office, interpretative panels, and possibly an auditorium and outdoor educational area. A pedestrian trail network will be developed from the visitor contact station looping inside and outside the ruins, through the landscape rehabilitation area to the north, and east to the riparian forest. The eastern loop will route through the riparian area and then split into two directions. One segment will route to the south, terminating at a viewpoint located at the confluence of the San Antonio River and Picosa Creek. The other segment will route to the north, crossing Picosa Creek via a proposed pedestrian bridge, emerging from the riparian area and then forming a large loop around the edges of an existing pasture. The eastern loop will also include a potential future connection to the City of Floresville Hike and Bike Trail. The alternative also includes implementing strategies in order to ensure the preservation of the Rancho compound ruins. These strategies are currently being developed as a separate action and may include leaving the ruins buried, the partial exposure of the ruins, or the full exposure of the ruins. A vegetation rehabilitation and management program will also be created in the area surrounding the visitor contact station and Rancho compound ruins. This effort will clear successional growth and result in a landscape surrounding the ruins that is more representative of the Spanish colonial period. The program may be extended to include the old pasture located to the northeast of the ruins over Picosa Creek.

Mitigation Measures

The following mitigation measures were developed to minimize the degree and/or severity of adverse effects that are expected to result from the implementation of the action:

Design:

- All components of the proposed park improvements will be designed and installed in a manner that is complementary to the rural setting of the Rancho.
- All components of the proposed park improvements will be designed and installed in a manner that is consistent with the 1998 CLR - Recommended Design Guidelines.
- Sustainable building technologies will be incorporated into the design of all of the proposed park improvements.
- Pedestrian trails will be designed and routed to ensure that the removal of any significant heritage trees within the riparian area is avoided to the greatest extent possible. Trail design will be coordinated with the San Antonio River Authority.

- The long-term preservation strategy for the ruins proposed as part of the park improvements will be determined during final design. Options include leaving the ruins buried, partial exposure of the ruins, or full exposure of the ruins. This will be a separate action.
- Additions, alterations, or related new construction will be designed to avoid destruction of historic materials, features, and spatial relationships that characterize the cultural landscape. New features will be designed in a way that they are differentiated from the old but are also compatible with the historic materials, features, and massing of the landscape.
- Additions and adjacent or related new construction will be designed in such a way that should the structure need to be removed in the future, the essential form and integrity of the cultural landscape will not be impaired.
- Comprehensive documentation of any features to be replaced, removed, or altered will precede actual physical work as defined by the Section 106 coordination process. All SHPO required mitigation measures must be in place prior to any physical work being undertaken.
- A Storm Water Pollution Prevention Plan (SW3P) will be developed during project design and implemented and maintained during construction to minimize impacts as specified by EPA regulations for construction projects. The SW3P will include both construction and staging areas.

Construction:

- Construction materials and labor will be sourced locally to the greatest extent possible.
- Construction zones, particularly for the visitor contact station and parking lot, will be identified and fenced with construction tape or some similar material prior to any construction activity. The fencing will define the construction zone and confine activity to the minimum area required for construction. All protection measures will be clearly stated in the construction specifications, and workers will be instructed to avoid conducting activities beyond the construction zone as defined by the construction zone fencing.
- Standard erosion control measures, such as silt fences and/or sand bags, will be used to minimize any potential soil erosion where soils are disturbed until revegetation takes place.
- Re-vegetation and re-contouring of disturbed areas will take place following construction. Re-vegetation efforts will rely solely on the use of native vegetation.
- Weed control methods will be implemented to minimize the introduction of noxious weeds. Construction equipment will be washed prior to entering the work site for the first time.
- Water will be sprayed on construction sites during dry periods to control fugitive dust generated by construction.
- Construction equipment will not be permitted to idle for long periods of time to reduce noise and emissions.
- The contractor will regularly monitor and check construction equipment to identify and repair any leaks to avoid and minimize possible soil contamination from construction equipment.

- All ground penetrating activities will be monitored by a professional archeologist.
- Should construction unearth previously undiscovered cultural resources, work will be stopped in the area of any discovery, and the park will consult with the State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation, as necessary, according to §36 CFR 800.13, Post Review Discoveries. In the unlikely event that human remains are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act (1990) will be followed.
- NPS will ensure that all contractors and subcontractors are informed of the penalties for illegally collecting artifacts or intentionally damaging paleontological materials, archeological sites, or historic properties. Contractors and subcontractors will also be instructed on procedures to follow in case previously unknown paleontological or archeological resources are discovered during construction.
- Construction personnel will be responsible for ensuring trash is properly disposed of and not left uncontained onsite overnight. A trash abatement program, which will include a recycling plan, will be initiated during pre-construction phases of the project, and will continue throughout the duration of the project.
- Pre-construction surveys will be conducted for bird nests for all construction activities scheduled within the nesting season (generally April 1 through July 15) to address species protected under the Migratory Bird Treaty Act. No construction activities will be conducted in identified nesting areas until the young have fledged.
- Walking surveys will be performed by NPS personnel prior to any activities that have the potential to harm or displace wildlife. These surveys will identify any significant vegetation assemblages or wildlife habitation areas such as burrows or nests. Should the presence of species of interest, particularly either the Texas tortoise or Texas horned lizard, be detected during these surveys, management strategies will be implemented to ensure that constructions activities do not impact either of these species.
- NPS will ensure that all contractors and subcontractors are informed of the NPS mission of preserving natural resources and biodiversity. Contractors and subcontractors will also be instructed on procedures to follow if wildlife species of interest are encountered during construction.
- All construction or project activities within 100 yards of Picosa Creek and the San Antonio River will be coordinated with the San Antonio River Authority prior to commencement.

Operations:

- A vegetation rehabilitation and management program will be developed and implemented based on recommendations and guidelines as described in the 1993 Guiding Principles of Sustainable Design and the 1998 Rancho de las Cabras CLR. These strategies may include controlled burning, mowing or grazing.
- The local community will be utilized and involved as much as possible to assist with the interpretation of the site, park maintenance and security.

Alternatives Considered

In order to address the purpose and need described above, two action alternatives (plus the no-action alternative) were identified based on program goals and objectives, internal and external scoping, guidance from existing park plans, and policy guidance from the NPS: Alternative 1 – Moderate Action and Alternative 2 – Maximum Action.

Alternative 1 is not preferable because it provides a lesser level of improvement in park infrastructure and less restoration and protection of the cultural and natural landscape. The visitor experience would likely be less than desired.

The no-action alternative is not the preferable alternative because current park infrastructure does not allow the potential of the park to be utilized, and no-action does not protect, preserve, and enhance historical, cultural and natural resources because invasive species and other modern disturbances will continue to degrade the environment. In short, the necessary infrastructure required to accommodate permanent staff and extend visitors hours at the park would not be created and the modified cultural landscape would not be rehabilitated.

Why the Preferred Alternative Will Not Have a Significant Effect on the Human Environment

As defined in 40 CFR §1508.27, significance is determined by examining the following criteria:

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

Implementation of the preferred (selected) alternative will result in some adverse impacts; however, the overall benefit of the project, particularly to the cultural landscape and visitor use and experience, outweighs these negative effects. The effects are summarized as follows.

Minor, temporary, adverse impacts to visitor use and experience will result from increased noise and dust associated with construction activities. Moderate adverse, site-specific, short-term impacts on soils will result from the ground disturbance. However, long-term beneficial impacts will result from the extended vegetation rehabilitation and management program which will enhance species bio-diversity and further mitigate the negative impact that the dense proliferation of successional growth has had on the landscape. Minor adverse, direct and/or direct, site-specific, short- and/or long-term impacts to wildlife will result from disturbances and removal of some types of wildlife habitat.

Minor adverse, site-specific, long-term impacts to archeological resources may result from the discovery of unknown sub-surface archeological resources. Construction phase archeological monitoring will ensure that any archeological resources that are disturbed will be appropriately coordinated per the National Historic Preservation Act. As a result of these efforts, should archeological resources be discovered, beneficial, local, long-term, minor impacts may result from the potential contributions made to the archeological record of the Spanish colonial period. In addition, a long-term, moderate beneficial impact to the cultural landscape will result from implementing the preferred alternative through the extended vegetation rehabilitation and management program. The integrity of setting and feeling and association related to the Spanish colonial landscape will be further enhanced.

Implementing the preferred alternative will have a moderate, long-term beneficial impact on visitor use and experience. These beneficial impacts to visitor use and experience will primarily result from the extension of vegetation rehabilitation and management program and the enhanced educational and recreational opportunities offered by the extended pedestrian trail network and the creation of a visitor contact station.

Adverse, short-and/or long-term and moderate impact on park operations and management may result from the increased staff time and resources required to maintain the new developments and to accommodate the anticipated increase in visitor traffic. Opportunities for support through the NPS system and local partnerships have however been identified and efforts are currently underway to secure the resources necessary to address potential adverse impacts to the parks operations and management. As a result of these efforts it is anticipated that the potential adverse impacts will be sufficiently mitigated to result in in adverse, site-specific, short-and/or long-term and minor impacts on park operations and management.

Implementing the preferred alternative will also have a beneficial, local, long-term, and moderate impact on socioeconomics. These benefits will primarily result from the further economic opportunities offered by the additional visitor traffic who in turn, will contribute to the local economy.

The degree to which the proposed action affects public health or safety

The preferred alternative will have a beneficial effect on public health and safety through the enhanced visitor services and the pedestrian trail network.

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

The preferred alternative will not impact unique characteristics of the area including park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas because these resources either do not exist in the project area or will be avoided.

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

Throughout the environmental process, the proposal to implement developments at the Rancho de las Cabras has not been highly controversial, nor are the effects expected to generate future controversy.

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

The effects of developments at the Rancho de las Cabras are fairly straightforward and do not pose uncertainties. Construction phase archeological monitoring will ensure that any uncertainties associated with undiscovered archeological resources are mitigated to the greatest extent possible. The environmental process has not identified any effects that may involve highly unique or unknown risks.

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

The preferred alternative is not expected to set a precedent for future actions with significant effects, nor does it represent a decision in principle about a future consideration.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.

Cumulative effects were analyzed in the EA and no significant cumulative impacts were identified.

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

The preferred alternative will not result in adverse impacts to known NRHP eligible historic structures. Construction phase archeological monitoring will ensure that any uncertainties associated with undiscovered archeological resources are mitigated to the greatest extent possible.

The preferred alternative has the potential to beneficially impact the cultural landscape through the extended vegetation rehabilitation and management program. This program will restore part of the site to better represent its appearance during the Spanish colonial period.

Correspondence received from the Texas Historical Commission (THC) on May 2, 2014 indicated their support for this project and the need and preference for Section 106, NHPA coordination and consultation during the design phase of the project and prior to project implementation. San Antonio Missions National Historical Park is committed to achieving a "no adverse effect" determination for the proposed project and will complete all necessary Section 106 consultations prior to project implementation.

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

There will be "no effect" on endangered or threatened species or habitat per §7 of the Endangered Species Act. A letter of December 20, 2014 received from the Austin, Texas office of the U.S. Fish and Wildlife Service confirmed that no listed species were likely to be present.

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

The action will not violate any federal, state, or local laws or environmental protection laws. Additional compliance will be done for any additions, alterations, or related new construction that was not analyzed in this EA.

Public Involvement and Native American Consultation

The EA was made available for public review and comment during a 30-day period ending December 24, 2013. To notify the public of this review period, a letter was mailed to stakeholders, Native American tribes, interested parties, and newspapers. Copies of the document were sent to certain agencies, made available at the park office; and posted on the NPS PEPC website at http://parkplanning.nps.gov/rancho_ea.

Four comments were received on the NPS PEPC website during this review period, three from the general public and one from the San Antonio River Authority (SARA). In addition, a comment letter was received from a Native American tribe, the White Mountain Apache. The tribe did not object to the proposed action or make any substantive comments. Only two of the commenters had substantive comments which are addressed in the attached Errata Sheets.

Conclusion

As described above, the preferred alternative does not constitute an action meeting the criteria that normally require preparation of an environmental impact statement (EIS). The preferred alternative will not have a significant effect on the human environment. Environmental impacts that could occur are limited in context and intensity, with generally adverse impacts that range from localized to widespread, short- to long-term, and negligible to moderate. There are no unmitigated adverse effects 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, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection law.

Based on the foregoing, NPS has determined that an EIS is not required for this project and thus will not be prepared.

Approved:

Laura E. Joss for Sue E. Masica
Regional Director, Intermountain Region, National Park Service

7/30/14
Date

Errata Sheets

Rancho de las Cabras
Enhance Visitor Services and Rehabilitate the Cultural Landscape
San Antonio Missions National Historical Park

According to NPS policy, substantive comments are those that 1) question the accuracy of the information in the EA, 2) question the adequacy of the environmental analysis, 3) present reasonable alternatives that were not presented in the EA, or 4) cause changes or revisions in the proposal.

Some substantive comments may result in changes to the text of the EA, in which case, they are addressed in the *Text Changes* section of the Errata Sheets. Other substantive comments may require a more thorough explanatory response and are addressed in the *Response to Comments* section. NPS responds to all substantive comments in either or both of these sections.

Of the five responses that were received during public review of the EA, two of them offered substantive comments. Substantive comments for this EA centered on a river recreation, aquatic species of concern, and project coordination. These comments resulted in minor changes to the text of the EA and are also explained more thoroughly in the *Response to Comments* section.

Text Changes

Summary, Alternative 2 - A signed landing would be designated there, with posts or other objects installed for recreational boaters to tie up their boats, to facilitate connection with the Saspamco Paddling Trail and river access to the site.

Page 13, Impact Topics Dismissed From Further Analysis, Threatened, Endangered, Rare, and Protected Species – In addition, there are three freshwater mussels listed as candidate species, the Golden Orb (*Quadrula aurea*), Texas Fatmucket (*Lampsilis bracteata*), and Texas Pimpleback (*Quadrula petrina*). They are also listed as threatened by the State of Texas. Mussels are sedentary, semi-mobile invertebrates that inhabit the substrates of rivers, streams, lakes, and marshes. The Golden Orb is known to occur in the San Antonio River system and the Texas Fatmucket and Pimpleback could occur there. They are not likely to occur in Picosa Creek, an intermittent stream. The proposed park improvements will not directly affect the streams or their substrates. Indirect effects, largely related to potential erosion and sedimentation, are not anticipated either, given the distance from the construction areas to the streams and the mitigation measures that will be employed. All proposed trail work near the creek and river will also be coordinated with SARA to ensure avoidance of impact on mussel habitat.

Page 21, Alternatives Considered, Alternative 2 - A signed landing would be designated there, with posts or other objects installed for recreational boaters to tie up their boats, to facilitate connection with the Saspamco Paddling Trail and river access to the site.

Page 23, Alternatives Considered, Alternative 2, Mitigation Measures - Trail design would be coordinated with the San Antonio River Authority.

Page 25, Alternatives Considered, Alternative 2, Mitigation Measures -

- All construction or project activities within 100 yards of Picosa Creek and the San Antonio River would be coordinated with SARA prior to commencement.

Response to Comments

Comment 1 – The addition I would suggest is a docking space on the San Antonio River at the bottom on the hill down from the Rancho site. This would encourage the use of the river plus increase visitation to the Rancho site.

Response 1 – We have amended the preferred alternative to include an unimproved landing for canoes and kayaks at the confluence of the San Antonio River and Picosa Creek, as a way to facilitate connection to the upstream Saspamco Paddling Trail. The landing would not involve any construction or permanent improvements and would likely consist of one or two posts or other objects to tie up to and a sign informing boaters they can land here and use the trail to explore the site. Appropriate text has been added to Alternatives Considered, Alternative 2 – Maximum Action, under Extension of the Trail Network. Since no construction or additional vegetation removal is required the impact analysis did not change and no further text changes are needed. The existing mitigation requirements would address this small additional action.

Comment 2 – Should any native aquatic species be required to be relocated during construction the National Park Service (NPS) is encouraged to file an Aquatic Resource Relocation Plan with the Texas Parks and Wildlife Department (TPWD). If the NPS is performing any type of new construction and or maintenance that requires relocation of aquatic species in any watershed within the San Antonio River Basin, they are responsible for filing an Aquatic Resource Relocation Plan with TPWP which states how and where native specimens are to be relocated until the project is completed.

Response 2 – There will be no construction activities in any wetlands or water so there is no potential for relocating native aquatic species and therefore, no plan is needed.

Comment 3 - As the draft EA's section on the Endangered Species Act, Threatened, Endangered, Rare, and Protected Species, does not mention aquatic species SARA notes it is likely that the State listed Golden Orb mussel and possibly the Texas Pimpleback mussel may reside within the project area. The Golden Orb (Quadrula aurea) and Texas Pimpleback (Quadrula petrina) are also Candidate species with the United States Fish and Wildlife (USFW) service.

Response 3 – Text regarding these species has been added to Impact Topics Dismissed From Further Analysis, Threatened, Endangered, Rare, and Protected Species (see above).

Comment 4 - SARA likely owns the bed and banks of Picosa Creek and certainly owns the beds and banks of the San Antonio River in the project area, and we encourage NPS to coordinate any construction or maintenance along or over the Creek and River with SARA.

Response 4 - We have added a SARA coordination requirement in Alternatives Considered, Alternative 2 – Maximum Action, Mitigation Measures under both Design (for trail work) and Construction.

Comment 5 - The Saspamco Paddling Trail is a 12 mile trail that ends approximately 12 miles north of the project area but may allow for connected river access to the Rancho. Since the preferred alternative contemplates river access with a canoe / kayak landing it may be worth mentioning the existing Saspamco trail.

Response 5 - See Response 1 above.

Appendix – Non-Impairment Determination

National Park Service's *Management Policies, 2006* require analysis of potential effects to determine whether or not actions will impair park resources. The fundamental purpose of the national park system, established by the Organic Act and reaffirmed by the General Authorities Act, as amended, begins with a mandate to conserve park resources and values. National Park Service managers must always seek ways to avoid, or to minimize to the greatest degree practicable, adversely impacting park resources and values.

However, the laws do give the National Park Service the management discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, as long as the impact does not constitute impairment of the affected resources and values. Although Congress has given the National Park Service the management discretion to allow certain impacts within park, that discretion is limited by the statutory requirement that the National Park Service must leave park resources and values unimpaired, unless a particular law directly and specifically provides otherwise. The prohibited impairment is an impact that, in the professional judgment of the responsible National Park Service manager, will harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values. An impact to any park resource or value may, but does not necessarily, constitute an impairment. An impact will be more likely to constitute an impairment to the extent that it affects a resource or value whose conservation is:

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;
- key to the natural or cultural integrity of the park; or
- identified as a goal in the park's general management plan or other relevant NPS planning documents.

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

The park resources and values that are subject to the no-impairment standard include:

- the park's scenery, natural and historic objects, and wildlife, and the processes and conditions that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structures, and objects; museum collections; and native plants and animals;
- appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;
- the park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and
- any additional attributes encompassed by the specific values and purposes for which the park was established.

Impairment may result from NPS activities in managing the park, visitor activities, or activities undertaken by concessioners, contractors, and others operating in the park. The NPS's threshold for considering whether there could be an impairment is based on whether an action will have major (or significant) effects.

Impairment findings are not necessary for visitor use and experience, socioeconomics, public health and safety, environmental justice, land use, and park operations, because impairment findings relate back to park resources and values, and these impact areas are not generally considered park resources or values according to the Organic Act, and cannot be impaired in the same way that an action can impair park resources and values. After dismissing the above topics, topics remaining to be evaluated for impairment include soils, vegetation, wildlife, cultural landscapes and historic structures and districts.

Fundamental resources and values for San Antonio Missions National Historical Park (SAAN) are identified in the General Management Plan. According to that document, of the impact topics carried forward in this EA, only vegetation, cultural landscape, and archeological resources are considered necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park; are key to the natural or cultural integrity of the park; and/or are identified as a goal in the park's General Management Plan or other relevant NPS planning document.

- **Vegetation** – There are seven vegetation communities within the footprint of the planned park improvements at the Rancho. Impacts to these vegetation communities will result from the implementation of the preferred alternative. Construction of the visitor contact station, improvement of the entrance road and parking lot, creation of new trails, and restoration of native tall grass prairie would all eliminate some existing vegetation. Honey Mesquite - Granjeno / Prickly-pear species - South Texas Ericameria Woodland would be the community most affect and this is a common, widespread plant community in South Texas. Under the preferred alternative, impacts to vegetation would be adverse short-term, beneficial long-term, site-specific and moderate. Short-term adverse impacts would result from construction related disturbances, long-term beneficial impacts would result from the extended vegetation rehabilitation and management program which would enhance species bio-diversity and further mitigate the negative impact that the dense proliferation of successional growth has had on the landscape. Therefore, there will be no impairment to vegetation.
- **Cultural Landscapes** – SAAN was created in order to provide for the preservation, restoration, and interpretation of the Spanish Missions of San Antonio, Texas, to ensure benefit and enjoyment for the present and future generations. The implementation of the preferred alternative will further contribute to the desired cultural landscape by re-establishing more of the Spanish colonial period appearance of the landscape which will enhance visitor interpretational, educational, and recreational opportunities. The preferred alternative will have beneficial, local, long-term, moderate impact on the cultural landscape, as this is a beneficial impact, there will be no impairment to the cultural landscape.
- **Archeological Resources** – Many archeological investigations have been conducted at the Rancho including a pedestrian survey of the project area. These investigations have added valuable information to the archeological record of the area. The implementation of preferred alternative will result in adverse and beneficial, site-specific or local, short- and/or long-term, and minor to moderate impacts on archeological resources. Adverse impacts will result from potential construction and operational disturbances. Beneficial impacts could result from the contributions that any sub-surface archeological

discoveries could make to the archeological record of the Spanish colonial period. Because the preferred alternative will result in a localized disturbance to a previously surface-surveyed area, there will be no impairment to archeological resources.

In addition, as discussed in the mitigation section of the Environmental Assessment, mitigation measures for these resources will further lessen the degree of impact and help promote the protection of these resources.

In conclusion, as guided by this analysis, good science and scholarship, advice from subject matter experts and others who have relevant knowledge and experience, and the results of public involvement activities, it is the Superintendent's professional judgment that there will be no impairment of park resources and values from implementation of the preferred alternative.