




National Park Service
U.S. Department of the Interior
Zion National Park
Springdale, Utah

FINDING OF NO SIGNIFICANT IMPACT

SOUTH ENTRANCE MONUMENT SITE RECONFIGURATION

Recommended:


Jeffrey Bradybaugh
Superintendent, Zion National Park

5/23/17
Date

Approved:


Sue E. Masica

Regional Director, Intermountain Region, National Park Service

6/20/17
Date

INTRODUCTION

In compliance with the National Environmental Policy Act (NEPA), the National Park Service (NPS) prepared an Environmental Assessment (EA) to examine alternative actions and environmental impacts associated with the proposed project to reconfigure the South Entrance Monument at Zion National Park (ZION). The project is needed to enhance visitor safety, expand cultural resource protection measures, and help mitigate factors contributing to vehicle congestion experienced within the immediate area.

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

SELECTED ALTERNATIVE AND RATIONALE FOR THE DECISION

Based on the analysis presented in the EA, NPS selected Alternative B – South Entrance Monument Reconfiguration (the NPS preferred alternative).

The selected alternative will improve the conditions surrounding the existing South Entrance Station by shifting the historic South Entrance Monument away from the immediate roadway, installing a pedestrian plaza around the relocated monument, and reconfiguring the monument parking area immediately outside the boundary of the park. The South Entrance Monument will be relocated 28 feet east along the existing park boundary and stabilized with an I-beam and concrete footing. Installing a plaza immediately west of the repositioned Monument will provide a safe area for visitors to congregate near the Monument outside of the roadway. Reconfiguring the Monument parking area immediately south of the park boundary will provide the opportunity to extend the employee entrance lane, which also serves park pass holders on days experiencing higher than normal visitation, thus helping to alleviate vehicle traffic entering the park. Although the total number of parking areas will be reduced, all available parking will be designated for temporary, 10 minute parking only. The shift to temporary parking will help alleviate congestion by increasing the rate at which vehicles are moving through the area, thus facilitating the increasing numbers of visitors briefly stopping to view the monument before entering the park. Revegetation efforts and exotic plant removal will continue as needed, including inspection, removal, seed dispersal, direct planting, watering, and low profile barrier installation to deter visitors from trampling on newly vegetated areas. In addition, the project will implement a number of resource protection measures to minimize the degree and/or severity of adverse effects on air quality, archeological, ethnographic and paleontological resources, historic structures, lightscapes and soundscapes, vegetation and soils, visitor use and experience, wildlife and species of concern.

RATIONALE

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

- Improve pedestrian safety.
- Help reduce localized vehicle congestion.
- Reestablish the historic orientation of the monument sign.
- Protect the monument from vehicle collisions.

- Stabilize the monument.

MITIGATION MEASURES

In consultation with SHPO, one additional mitigation measure has been incorporated into the EA for the select alternative:

- Completion of a Historic Structure Report (HSR) for the South Entrance Monument which meets the standards of NPS-28, NPS Cultural Resource Management Guidelines. Digital and hard copies of the HSR will be provided to the signatories.

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

PUBLIC INVOLVEMENT/AGENCY CONSULTATION

Initial public scoping for the project occurred from November 30, 2016 through December 30, 2016. The EA was made available for public review and comment during a 30-days period, from April 17, 2017 through May 17, 2017. Twenty-three public comment letters were received. Substantive comments centered on additional infrastructure, the decrease to vehicular parking, and visitor safety and accessibility. Substantive comments area addressed in the Errata and Response to Public Comments.

Project goals and the resulting adverse impacts to the South Entrance Monument have been explicitly addressed and mitigated in a Memorandum of Agreement (MOA) between the Utah State Historic Preservation Office (SHPO) and ZION, signed June 13, 2017. As per the request of the SHPO, on May 5, 2017 ZION additionally contacted the National Trust for Historic Preservation (Denver Field Office), Preservation Utah (formerly Utah Heritage Foundation), and the CCC Legacy to inform the groups of the proposed project and offer the opportunity to provide comments and/or suggestions. The CCC Legacy contacted the ZION Cultural Program Manager on May 9, 2017 to express their support of the project. The National Trust for Historic Preservation contacted ZION on May 15, 2017 to extend their appreciation but declined the opportunity to provide comments on the EA or request consulting party status. No comments were received from Preservation Utah.

In a letter submitted to the U.S. Fish and Wildlife Service (USFWS) dated November 30, 2017, the NPS determined that the selected alternative will have No Effect on the following identified threatened, endangered, or candidate species and critical habitat within the action area: California condor (*Gymnogyps californianus*), Mexican Spotted Owl (*Strix occidentalis lucida*), Southwestern Willow flycatcher (*Empidonax trailii extimus*), Yellow-Billed Cuckoo (*Coccyzus americanus*), Virgin River Chub (*Gila seminuda (=robusta)*) Woundfin (*Plagopterus argentissimus*), Desert tortoise (*Gopherus agassizii*), Dwarf Bear-poppy (*Arctomecon humilis*), Gierisch Mallow (*Sphaeralcea gierischii*), Holmgren Milk-vetch (*Astragalus holmgreniorum*), Jones Cycladenia (*Cycladenia humilis var. jonesii*), Shivwits Milk-vetch (*Astragalus ampullarioides*), Siler Pinchshion Cactus (*Pediocactus (=Echinocactus, =Utahia) sileri*), and Mexican Spotted owl (*Strix occidentalis lucida*) critical habitat. On April 20, 2017, ZION provided a copy of the South Entrance Monument Site Reconfiguration EA to the USFWS and indicated that pertinent project files, including all scoping letters and the EA, had been uploaded to the Information for Planning and Conservation (IpaC) website (<https://ecos.fws.gov/ipac/>) on

April 18, 2017. On May 19, 2017, a follow-up email was sent to USFWS to confirm the close of the public review period and inquire of any new comments, questions, or concerns regarding the project. The NPS No Effects determination has been properly filed with USFWS and no additional comments or concern from USFWS have been received to date.

FINDING OF NO SIGNIFICANT IMPACT

CEQ regulations at 40 CFR section 1508.27 identify ten criteria for determining whether the selected alternative will have a significant effect on the human environment. The NPS reviewed each of these criteria given the environmental impact described in the EA and determined there will be no significant direct, indirect, or cumulative impact under any of the criteria.

The following impact topics were dismissed because they did not warrant a full analysis: Air Quality and Green House Gas Emissions; Archeological Resources; Cultural Landscapes; Environmental Justice; Ethnographic Resources; Indian Trust Resources and Sacred Sites; Socioeconomics; Soundscape; Vegetation and Soils; and Wildlife and Special Status Species.

As described in the EA, the selected alternative has the potential for adverse impact on historic structures and visitor use and experience; however, no potential for significant adverse impacts was identified.

Implementing the selected alternative will result in adverse impacts to a historic structure by increasing the distance (28 feet) between the two entrance pylons and by adding non-historic/non-contributing structures around the monument that do not currently exist. The additional features (840 sq. ft. plaza with seatwall and 200 ft. long x 5 ft. wide walkway) will alter the look and feel of the South Entrance but will not affect the integrity of the monument to convey its significance nor challenge National Register eligibility; therefore, the adverse effect will be less than significant. The selected alternative will also have beneficial effects by reducing the risk of vehicle-monument collisions and strengthening the structural integrity of the monument. As previously stated, to ensure appropriate treatment of historic properties the NPS and the SHPO signed a MOA with stipulations on June 13 2017, for the treatment of historic properties that may be adversely affected by project implementation.

Visitor Use and Experience will be adversely impacted by the selected alternative by reducing parking near the monument as well as from the introduction of construction noise and temporary area closures throughout the 60-90 day construction period. Construction activities will result in the permanent removal of approximately sixteen (16) parking spaces. Long-term parking in the six (6) remaining parallel parking spaces will also be modified to accommodate short-term, 10 minute parking only. Although construction will modestly reduce parking in the surrounding area, the proposed parking design will help facilitate the movement of vehicles by increasing the rate at which vehicles are moving through the area. Furthermore, the introduction of construction noise will occur within the ZION Front Country High Development Zone where it is common for visitors to periodically experience noise from a variety of mechanical and other human-made sounds. For these reasons, resulting adverse effects will be less than significant. The selected alternative will also have beneficial effects by introducing a safe, comfortable, and universally accessible location to enjoy the monument.

Best management practices and mitigation measures stated in the EA will be implemented to minimize the subsequent effects resulting from the selected alternative: new structures will be as compatible as practical with the historic architectural characteristics; transplant and revegetation efforts will echo the existing native landscape; and signs, alerts, press releases, and notifications will be issued to inform visitors prior to and throughout the duration of construction, etc.

The project will not result in the loss of destruction of significant scientific, cultural, or historical resources, nor will there be any significant impacts on public health, public safety, or unique characteristics of the region. No highly uncertain or controversial impact, unique or unknown risks, significant cumulative effects, or element of precedence were identified. Implementation of the NPS selected alternative will not violate any federal, state, or local environmental protection laws.

CONCLUSION

As described above, the selected alternative does not constitute an action meeting the criteria that normally requires preparation of an environmental impact statement (EIS). The selected alternative will not have a significant effect on the human environment in accordance with Section 102(2)(c) of NEPA.

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

APPENDIX A: MITIGATION MEASURES

The following mitigation measures will minimize the degree and/or extent of adverse impacts and will be implemented during the project.

Air Quality

- Equipment will not be allowed to idle longer than 2 minutes when not in use.
- All motor vehicles and equipment will have mufflers conforming to original manufacturers' specification that are in good working order and are in constant operation to prevent excessive or unusual fumes or smoke.
- All haul loads will be trapped.

Archeological, Ethnographic, and Paleontological Resources

- All contractors and subcontractors will be informed of the procedures to follow in the event of archeological, ethnographic, and paleontological resource discovery, as well as the penalties for illegally collecting artifacts or intentionally damaging paleontological materials, archeological sites, or historic properties.
- During construction, specifically activities involving earthwork or digging, qualified park staff will monitor work zones to confirm the presence or absence of significant archeological, ethnographic, or paleontological resources. Should construction unearth cultural or paleontological resources, work will be stopped in the area of discovery and the park will consult with the State Historic Preservation Office (SHPO) and the Tribal Historic Preservation Officers in accordance with §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.

Historic Structures

- Building and site design will be as compatible as practical with the historic architectural characteristics and incorporate similar architectural features, materials, surface finishes, and color.
- Documentation in the form of highly accurate and measurable 3D modeling will be obtained utilizing a laser scanner prior to construction to include both pylons and the surrounding South Entrance landscape.
- Construction staging areas will be restricted to ensure no fill or materials disturb known historic structures. Site selection will be coordinated with the Zion Cultural Program Manager prior to construction.
- Upon project completion, an amendment will be prepared to the National Register of Historic Places for the South Entrance Monument that at minimum includes: the updated location, a detailed physical description of the structure, and a history of management action in the project area.
- Completion of a Historic Structure Report (HSR) for the South Entrance Monument which meets the standards of NPS-28, NPS Cultural Resource Management Guidelines. Digital and hard copies of the HSR will be provided to the signatories.

Lightscares and Soundscapes

- Hours of outdoor construction will be limited to hours between sunrise and sunset, so no

lighting will be needed.

- Hours of operation of motorized equipment will be limited to 9:00 a.m. to 5:00 p.m. to protect dawn, dusk, and nighttime quiet.
- Equipment will not be allowed to idle longer than 2 minutes when not in use.
- All motor vehicles and equipment will have mufflers conforming to original manufacturers' specification that are in good working order and are in constant operation to prevent excessive or unusual noise.

Vegetation and Soils

- Construction zones will be identified (i.e. flagging, construction tape, etc.) to confine activity to the minimum work area required.
- Construction equipment will be cleaned before entering the park to minimize the transport of exotic seeds to the site. All equipment entering the park will be inspected and may be required to be pressure washed to remove foreign soil, vegetation, and other materials that may contain non-native seeds or vegetation.
- Construction materials staging areas will be restricted to previously disturbed sites.
- Erosion control measures that provide for soil stability and prevent movement of soils will be implemented, such as installing erosion control wattles along the edge of construction.
- Any disturbed soils will be salvaged and used to restore the area.

Visitor Use and Experience

- Signs, alerts, press releases, and notifications will be issued to inform visitors prior to and throughout the duration of construction.
- Construction zones will be identified (i.e. flagging, construction tape, fencing, etc.) to prevent visitors from entering construction zone unknowingly.
- Construction materials staging will be restricted to areas that will neither impede vehicle traffic of visitors, contractors, or park staff.

Wildlife

- Construction personnel will be oriented on appropriate behavior in the presence of wildlife and proper food storage, handling, and disposal and/or other attractants.
- Construction site and staging areas will be monitored by park natural resource staff throughout the duration of the project in case any special status species unexpectedly appear in the project area. Should any appear and if park staff become concerned about potential adverse impacts on the species from construction or other project related activities, work will stop and not resume until necessary protective steps are taken to avoid any impacts to the special status species.

ERRATA AND RESPONSE TO PUBLIC COMMENTS

SOUTH ENTRANCE MONUMENT SITE RECONFIGURATION ENVIRONMENTAL ASSESSMENT

ZION NATIONAL PARK
JUNE 2017

The following errata and response to public comments together with the Findings of No Significant Impact (FONSI) and the Environmental Assessment (EA) describe the final decision of the National Park Service for the South Entrance Monument Site Reconfiguration.

ERRATA

These errata are to be attached to the South Entrance Monument Site Reconfiguration EA dated April 2017 and are intended to correct or clarify statements in the EA other than typographical and minor editorial errors and to address substantive comments on these documents received during the public review period.

A) Alternatives Carried Forward: Alternative B – South Entrance Monument Reconfiguration (Pg. 8): Replace current text with revised text.

Current Text:

3. The monument parking area (asphalt) would be reconfigured from 12,700 sq. ft. to 6,500 sq. ft., provide approximately 6 short-term, parallel spaces, and allow the eastern most vehicle entrance lane to be extended approximately 200 linear feet.

Revised Text:

3. The monument parking area (asphalt) would be reconfigured from 12,700 sq. ft. to 6,500 sq. ft., provide approximately 6 short-term, parallel spaces, and allow the eastern most employee vehicle entrance lane to be extended approximately 200 linear feet.

B) Mitigation Measures: Historic Structures (Pg. 13): Add mitigation measure.

- Completion of a Historic Structure Report (HSR) for the South Entrance Monument which meets the standards of NPS-28, NPS Cultural Resource Management Guidelines. Digital and hard copies of the HSR will be provided to the signatories.

C) Affected Environment and Environmental Consequences: Historic Structures Impacts of Alternative B (Pg. 18): Replace current text with revised text:

Current Text:

The addition of non-historic/non-contributing structures (i.e. monument plaza, seatwall, and walkway) around the monument would slightly alter the look at feel of the South Entrance but these alterations not affect the integrity of the monument to convey its significance nor challenge National Register eligibility.

Revised Text:

The addition of non-historic/non-contributing structures (i.e. monument plaza, seatwall, and walkway) around the monument would slightly alter the look and feel of the South Entrance but these alterations not affect the integrity of the monument to convey its significance nor challenge National Register eligibility.

D) References (Pg. 22): Insert reference.

Connor, M.A. and S.M. Vetter. 1986. *Archeological Investigations at Zion National Park*. Midwest Archeological Center Occasional Studies Anthropology No. 19. United States Department of the Interior, National Park Service. Midwest Archeological Center, Lincoln, Nebraska.

RESPONSE TO PUBLIC COMMENTS

The EA was released for public review from April 17, 2017 to May 17, 2017. Nearly 200 members of the public and various agencies were notified of the EA's availability. The EA was made available in hard copy and digital format. Ninety-five (95) notifications were mailed via U.S. Postal Service, 38 notifications were sent via email, and 58 copies were mailed to other agencies, elected officials, and affiliated Native American tribes. The EA was also made available at the Zion Human History Museum.

In response to the EA, 23 comments were received from the public: 22 individuals, 1 public agency. All comments will be maintained in the project decision file.

Many comments address issues already adequately covered in the EA. Other comments addressed additional infrastructure, the decrease to vehicular parking, and visitor safety and accessibility. The vast majority of received comments pertain more to overall management of visitor use in the park. Although these comments do not directly correlate with the project objectives described in this EA, park management officials find the opportunity to respond to these comments valuable and chose to address these comments in the *Visitor Use Management* section of this Errata.

No comments warranted development of an additional alternative or reconsideration of alternatives that were considered but dismissed. Therefore, the alternatives remain as described in the EA and no changes were made in the assessment of environmental consequences other than minor word-processing edits and correction to sentences in response to review comments, as presented in the Errata.

The public comments and responses are summarized as follows:

ADDITIONAL INFRASTRUCTURE AND/OR SIGNAGE

1. COMMENT - Commenter recommends extending the employee lane farther into the Town of Springdale and Rockville to reduce wait times at the ZION South Entrance.

RESPONSE - In conjunction with the Utah Department of Transportation (UDOT), the Town of Springdale and Rockville have recently completed Phase 1 of the *SR-9 Renewal Rockville to Zion National Park* project. This multi-phased road construction project will incorporate infrastructure to support additional parking, cycling, pedestrian traffic, etc. The

ZION employee lane falls outside of the park boundary. Extending the ZION employee lane beyond what is described in the EA could significantly interfere with the planning and development of the SR-9 Renewal project. For additional information regarding the SR-9 Renewal project the project communication team can be reached by phone at 888-556-0232 or by email at sr9@utah.gov.

Concerns regarding entry wait times have been noted. ZION management officials are currently working to develop strategies to address increasing visitation, traffic flow, and parking needs within park boundaries as well as with the Town of Springdale and Rockville. Comment has been shared with the Zion Visitor Use Management Plan Task Force.

2. **COMMENT** - Commenter recommends ensuring the employee lane is extended and clearly defined for those unfamiliar with the area.

RESPONSE - Obstruction of the employee lane as a result of the Monument's current location will be eliminated following relocation. In conjunction with the relocation of the monument, the reconfiguration of the parking area will provide enough space to increase the length of the existing employee lane by approximately 200 feet. This will result in the lane itself to be more defined as well as increase the visibility of existing employee lane signage.

3. **COMMENT** - Commenter was unable to determine from the images whether or not a lane will be added for park employees and states having a lane dedicated to employees will help to alleviate congestion.

RESPONSE - A detailed description of all project components is provided in the Alternatives section of the EA under Alternatives Carried Forward, Alternative B (pages 7 - 8). The relocation of the monument will provide enough space to increase the length of the existing employee lane by approximately 200 feet. See revised text in Section A. of this Errata for clarification.

4. **COMMENT** - Commenter recommends adding a fence between the new concrete footing and the road to keep visitors out of the roadway near the monument.

RESPONSE - The number of elements incorporated into the Monument Plaza design, such as a fence, have been intentionally minimized in order to preserve the original character of the structure to the extent possible. Should concerns persist with pedestrians entering the roadway near the monument, the NPS will reconsider additional strategies.

5. **COMMENT** - Commenter recommends expanding the scope of the EA to include an additional public entrance lane and states the relocation of the South Entrance Monument will only address a small portion of the existing traffic concerns.

RESPONSE - Further study is needed to develop the most appropriate alternatives and layout designs to facilitate the increasing volume of entry and egress traffic through the South Entrance which falls outside of the scope of this plan. ZION management officials are currently working to develop strategies to address increasing visitation, traffic flow, and

parking needs within park boundaries as well as with the Town of Springdale and Rockville. Comment has been shared with the Zion Visitor Use Management Plan Task Force.

DECREASE TO VEHICULAR PARKING

1. **COMMENT** - Commenter asks, "Has the park monitored the area during busy times to determine if 6 to 7 spots is sufficient to handle the quick picture taking activities?" Commenter recommended retaining the original parking alignment to retain the existing parking configuration while proceeding with the relocation of the monument and installation of the plaza.

RESPONSE - Under current conditions, monitoring of the area has demonstrated a significant portion of visitors utilizing the area for long term parking. Spaces generally fill up in the early hours of the day which restricts parking access to those arriving later in the day, particularly those briefly stopping to photograph the South Entrance Monument. Eliminating long-term parking will provide access for short-term parking all throughout the day and help reduce congestion by facilitating the characteristic traffic pattern in the area.

2. **COMMENT** - Commenter asks, "What consideration was given to the decrease in parking spaces?" The change to short-term spaces seems to coincide with visitor needs to take pictures with the monument quickly but the document does not provide any insight into the impact over (a) the loss of 18 parking spaces or (b) the wholesale change to short-term parking only.

RESPONSE - Impacts regarding the decrease in parking spaces and transition to short-term parking are detailed in the Affected Environment and Environmental Consequences section of the EA under Visitor Use and Experience (pages 19 - 21).

VISITOR SAFETY & ACCESSIBILITY

1. **COMMENT** - Commenter recommends retaining the non-historic orientation of the wooden pole and sign to increase the distance between the roadway and the location where pedestrians will gravitate.

RESPONSE - Concerns regarding visitor safety have been noted. The western most edge of the monument will be positioned 8 feet east of the roadway which meets project objectives to provide both increased safety for pedestrian and reestablishment of the original orientation of the Monument's sign. As depicted in the Alternatives section of the EA (Figure 3), road striping immediately adjacent to the Monument Plaza will also provide an additional buffer space by directing traffic away from the plaza area. Visitors will also have 40 feet of plaza space available directly in front of the monument.

2. **COMMENT** - Commenter recommends removing the handicap parking space since all of the temporary spaces have been stated in the EA as being able to accommodate those with accessibility concerns.

RESPONSE - To remain compliant with the American with Disabilities Act and the Architectural Barriers Act, a minimum of 1 accessible parking space must be designated in a parking area of this size.

3. **COMMENT** - Commenter asks, "Have you considered the angle of the plaza relative to the scenic cliffs and where people will want to take their pictures?" Commenter recommends extending the plaza into the existing roadway to provide additional space for pedestrians around the monument.

RESPONSE - The western most edge of the Monument will be positioned 8 feet east of the roadway which meets project objectives to provide both increased safety for pedestrian and reestablishment of the monument sign. As depicted in the Alternatives section of the EA (Figure 3), road striping immediately adjacent to the Monument Plaza will also provide an additional buffer space by directing traffic away from the plaza area. Visitors will also have 40 feet of plaza space available directly in front of the monument which is expected to provide sufficient space for visitors to capture photographs from a desired angle.

VISITOR USE MANAGEMENT

COMMENTS

1. Commenter recommends designating one lane for locals and annual pass holders to help alleviate congestion and asks if there any way to open up more parking in the park to help alleviate the parking situation?
2. Commenter recommends adding a lane exclusively for pass holders and/or a lane for motorcycle riders. Commenter recommends an automated pass system (e.g. EZ Pass) to facilitate more visitors entering the park in a timely manner.
3. Commenter recommends designating a lane exclusively for pass holders.
4. Concern expressed with the inadequacy of the design of the South Entrance as a whole to handle the current volume of visitors. Commenter recommends designating a lane exclusively for pass holders.
5. Concern expressed with the inadequacy of the South Entrance Station as a whole to handle the volume of visitors. Commenter recommends an automated pass system (e.g. I-Pass) to facilitate more visitors entering the park in a timely manner as well as a system to purchase entrance permits online.
6. Commenter expressed disapproval of efforts to increase tourism in the area and how the dramatic increases in visitation has diminished the quality of life for residents. Commenter recommends developing park visitor use capacities and an online registration system that gives precedence to individuals living within 75 miles of the park.
7. Commenter expressed frustration regarding the prolonged entry wait times at the South Entrance of the park and recommends a lane dedicated to pass holders. Frustration was also expressed with the wait times experienced at the Mount Carmel Tunnel passage and recommends oversized vehicles be directed around the park or grouping oversized vehicles to move through the tunnel periodically rather than delaying traffic for each oversized vehicle.

8. Concern expressed regarding the number and lack of preparedness of many visitors on the Angel's Landing trail.
9. Concern expressed regarding long lines of cars idling while waiting to enter the park. Commenter also questioned the effectiveness of the parking reconfiguration and recommends improvements along the road to keep visitors out of cars as much as possible.
10. Commenter asks, "During peak visitor use times, is the park able to designate pass-holder and non-pass holder lanes? Has the park considered an automatic turnstile/gate for non-operating hours?" Commenter also recommends an automated entry system that recognizes receipts, permits, and passes.
11. Commenter expressed concern regarding the enforcement of vehicular noise limits designated by the EPA and commended ZION on efforts to improve natural soundscapes in campgrounds and on trails.
12. Concern expressed regarding the increasing number of visitors to the park and requests park officials to take action on reducing the number of visitors.

RESPONSE

1. – 12. Concerns regarding the impacts of increased visitation, idling cars, and the potential impacts to the natural soundscape resulting from vehicle traffic have been noted but fall outside of the scope of this EA. Recommendations for pass holder/motorcycle lane designations, intelligent transportation systems (electronic/automated entry systems), and visitor capacity thresholds have also been documented and forwarded to the ZION Visitor Use Management Plan Task Force.

ZION management officials are currently working to develop strategies to address increasing visitation, traffic congestion (to include interruptions resulting from oversized vehicles), and parking needs within park boundaries as well as with the Town of Springdale and Rockville. Please visit the NPS Planning, Environment, and Public Comment (PEPC) website at <http://parkplanning.nps.gov> to learn more about the development of the ZION Visitor Use Management Plan and find ways to participate in the National Environmental Policy Act (NEPA) process.

Due to the high volume of visitors entering through the South Entrance, it is currently not feasible for the NPS to designate one lane solely to pass holders as no additional entrance lanes will be added at this time. In order for ZION to designate a pass holder lane, additional systems would need to be implemented (e.g. timed-entry, visitor capacities, reservation systems, etc.) of which will be considered and analyzed in the ZION Visitor Use Management Plan. However, continual efforts are being made by Zion staff to expedite entrance on exceptionally busy days for pass holders by permitting entry through the employee lane.

Intelligent Transportation Systems (ITS) encompass a broad range of wireless and wire line communications-based information and electronic technologies to help manage traffic congestion and improve safety, such as the electronic/automated entry systems recommended by commenters. While the view of ITS may change, the current view of the NPS recognizes ITS as a viable opportunity to improve park entrance infrastructure. However, current

transportation challenges center around a growing backlog of maintenance projects and equipment needs. The estimated replacement value (2012) of all NPS surface transportation assets is \$37.7 billion, representing approximately 20 percent of the value of all NPS assets. Unfortunately, historic funding levels have not kept pace with individual park needs. Additionally, public land staff often do not possess the resources, such as time and knowledge, to operate large-scale ITS deployments successfully. In many instances where traffic and congestion occur on a regular, predictable basis, the cost of procuring and implementing elaborate management systems is prohibitive. Other issues affecting ITS deployment and use within public lands concerns power and network connectivity. The rural nature of many park units prevents many systems from functioning properly due to inadequate power connections, network access, and connectivity issues. Please visit the NPS Transportation Program at <https://nps.gov/transportation/index.html> for additional information on NPS transportation initiatives, challenges, and long range planning. A report prepared by the National Transportation System Center (September 2011) detailing ITS systems used in the National Park System and other Federal Public Lands can be located under the Library link to the left of the page.

For additional details on the strategic efforts employed by the Park to maintain natural soundscapes, please refer to the Zion National Park Soundscape Management Plan located on the park website at www.nps.gov/zion under *Learn About the Park: Management*.

NON-IMPAIRMENT DETERMINATION

SOUTH ENTRANCE MONUMENT SITE RECONFIGURATION

ENVIRONMENTAL ASSESSMENT

ZION NATIONAL PARK
JUNE 2017

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

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

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

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

Fundamental resources and values for Zion National Park (ZION) are identified in the enabling legislation for the park, the Foundation for Planning and Management Statement, and the Long Range Interpretive Plan. Based on a review of these documents, the fundamental resources and values for ZION come from the park's geologic showcase, water shapes and landscapes, convergence of ecoregions, natural resource quality and function, wilderness character, wild and scenic rivers, remnants of humanity's past, opportunities for connection to the resources, preserving and studying the Zion natural and cultural history as well as an engineered way of life. Resources that were carried forward for detailed analysis in the EA and are considered necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park; are key to the natural or cultural integrity of the park; and/or are identified as a goal in relevant NPS planning documents include historic resources. Non-impairment determinations are not necessary for human health and safety or visitor use and experience because impairment findings relate back to park resources and values, and these impact topics are not generally considered park resources or values according to the Organic Act.

This non-impairment determination has been prepared for the selected alternative, as described in the Finding of No Significant Impact for the ZION South Entrance Monument Site Reconfiguration Environmental Assessment.

HISTORIC STRUCTURES

The South Entrance Monument consists of two sandstone pylons flanking the east and west sides of the park entrance road. A wooden, horizontal log beam also projects east from the east pylon to support the entrance sign. In 1987, the South Entrance Sign was nominated and accepted in the National Register of Historic Places (NRHP) under criteria C for its original character and fabric typical of the "NPS-Rustic" style (NRHP# 86003713). Non-contributing/non-historic elements associated with the monument include log and stone pillar fencing to mark the southern boundary of the park, stone curbing, and a stone wall affixed to the west pylon.

The selected alternative will reposition the monument and includes the addition of non-historical elements (plaza, walkway, and underground concrete footing). Importantly, the move would provide a safe distance, or buffer, from large vehicles entering the park which would help protect the monument from future vehicle-monument collisions and allow the wooden pole and sign to be returned to the historic orientation. The installation of the concrete footing would stabilize and strengthen the structural integrity of the monument thereby expanding cultural resource protection measures. Though there will be adverse impacts resulting from the increased distance between the two entrance pylons and the altered look and feel of the monument from additional non-historic elements, the original alignment of the monument along the southern boundary of the park will remain intact and will still be eligible for listing on the National Register of Historic Places.

The adverse effects on historic structures will be resolved through an MOA between the NPS and Utah State Historic Preservation Office (SHPO). The MOA includes stipulations to minimize adverse effects by completing a 3D model of the South Entrance landscape will be documented prior to construction, ensuring equipment staging areas will not disturb known historic structure or archeological sites within the project area, and preparing a NRHP nomination amendment following project completion. At a minimum the NRHP amendment will include an updated: location map, physical description of the structure, photographs, maps, and architectural drawings from the 3D model. The MOA also include stipulations to prepare

and distribute a Historic Structures Report for the South Entrance Monument which meets the standards of NPS-28 Cultural Resource Management Guidelines to all signatories. This mitigation process will provide important information on the project area's significance for use by anyone interested in researching the cultural resources of the park. The selected alternative will not impair historic structures with implementation of the stipulations in the MOA.

CONCLUSION

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

