

Stovepipe Wells Dunes Visitor Use Area Improvements

Inyo County

District 9-INY-190-PM 87.6/88.3

EA 09-318100

SCH No.: 2008011009

Initial Study with Negative Declaration



Prepared by the
State of California Department of Transportation

February 2008



General Information About This Document

What's in this document?

This document contains a Negative Declaration, which examines the environmental effects of a proposed project on State Route 190 in Inyo County.

The Initial Study and proposed Negative Declaration were circulated to the public from January 11, 2008 to February 11, 2008. Comment letters were received on the draft document. Responses to the circulated document are shown in the Comments and Responses section of this document. Throughout this document, a line in the margin indicates changes from the draft document.

What happens after this?

The proposed project has completed environmental compliance after the circulation of this document. When funding is approved, the California Department of Transportation, as assigned by the Federal Highway Administration, can design and construct all or part of the project.

For individuals with sensory disabilities, this document is available in Braille, large print, on audiocassette, or computer disk. To obtain a copy in one of these alternate formats, please call or write to Caltrans, Attn: Tom Dayak, Eastern Sierra Environmental Branch, 500 South Main Street, Bishop, CA 93514; (760) 872-0690 Voice, or use the California Relay Service TTY number, (711) 872-0690.

Negative Declaration

Pursuant to: Division 13, Public Resources Code

Project Description

The California Department of Transportation (Caltrans) proposes to pave an access loop and parking lot and add an eastbound turn lane off of State Route 190 at Stovepipe Wells Sand Dunes in Death Valley National Park. Caltrans would pave an 8-foot-wide shoulder along the north side and a 5-foot-wide shoulder and dike along the south side of State Route 190. The National Park Service would add interpretive facilities, comfort stations, and possibly picnic tables with shade structures.

Determination

Caltrans has prepared an Initial Study for this project and, following public review, has determined from this study that the project would not have a significant effect on the environment for the following reasons:

- The proposed project would have no effect on agricultural resources, hazards and hazardous materials, land use and planning, mineral resources, population and housing, public services, recreation or transportation/traffic.
- The proposed project would have no significant effect on aesthetics, air quality, biological resources, cultural resources, geology and soil resources, hydrology and water quality, noise, or utility and service systems.



Christine Cox-Kovacevich, Branch Chief
Office of Environmental Management, North
Central Region Environmental Division
California Department of Transportation

2/26/08
Date

Section 1 Project Information

Project Title

Stovepipe Wells Dunes Visitor Use Area Improvements

Lead Agency Name and Address

Caltrans — District 9
500 South Main Street
Bishop, CA 93514

Contact Person and Phone Number

Tom Dayak, Branch Chief, Eastern Sierra Environmental Branch
(760) 872-0690

Project Sponsor's Name and Address

National Park Service, Death Valley National Park
Wayne Badder, Chief, Maintenance Division
P.O. Box 579
Death Valley, CA 92328

General Plan Description and Zoning

The proposed improvements to the Stovepipe Wells Dunes Visitor Use Area comply with the primary management objectives for Death Valley National Park, as stated in the approved *General Management Plan* (NPS 2002) (National Park Service Environmental Assessment/Assessment of Effect Stovepipe Wells Dunes Visitor Use Area Improvements, December 2006). The project is on federal land in Death Valley National Park. The land is associated with the State Route 190 corridor. The project is adjacent to wilderness, but is not in the wilderness area.

Project Location

The Stovepipe Wells Sand Dunes are about 2 miles east of the Stovepipe Wells Village in Death Valley National Park in Inyo County, California. The Stovepipe Wells Dunes are in the central part of Death Valley. State Route 190 skirts the southern boundary of the dunes and provides the easiest access for visitors. The project would take place mostly on the north side of State Route 190, but there would be some construction on the south side of State Route 190 as well. See the Project Vicinity Map and Project Location Map.

Description of Project

The project consists of paving an access loop and parking lot near Stovepipe Wells Dunes. The project would add an eastbound turn lane off of State Route 190 to access the parking area. In addition, Caltrans would pave an approximately 5-foot-wide shoulder and a 6-inch dike along about 1,550 feet of the south side of the highway to reduce sand getting onto the highway and to encourage parking in the parking lot. Caltrans would also pave an 8-foot-wide shoulder on the north side of the highway.

The parking lot would provide parking for 48 vehicles. The National Park Service would add interpretive facilities, a comfort station and possibly picnic tables with shade structures. See Appendix A for the Project Schematic.

The project would improve safety by directing visitors to park off the highway, reducing the likelihood that pedestrians would come in conflict with the traffic on State Route 190. The Stovepipe Wells ranger station parking area at post mile 86.2 on the north side of State Route 190 would be used for storage and for loading construction materials into construction vehicles. Construction would occur during late fall and winter months to avoid the high summer temperatures.

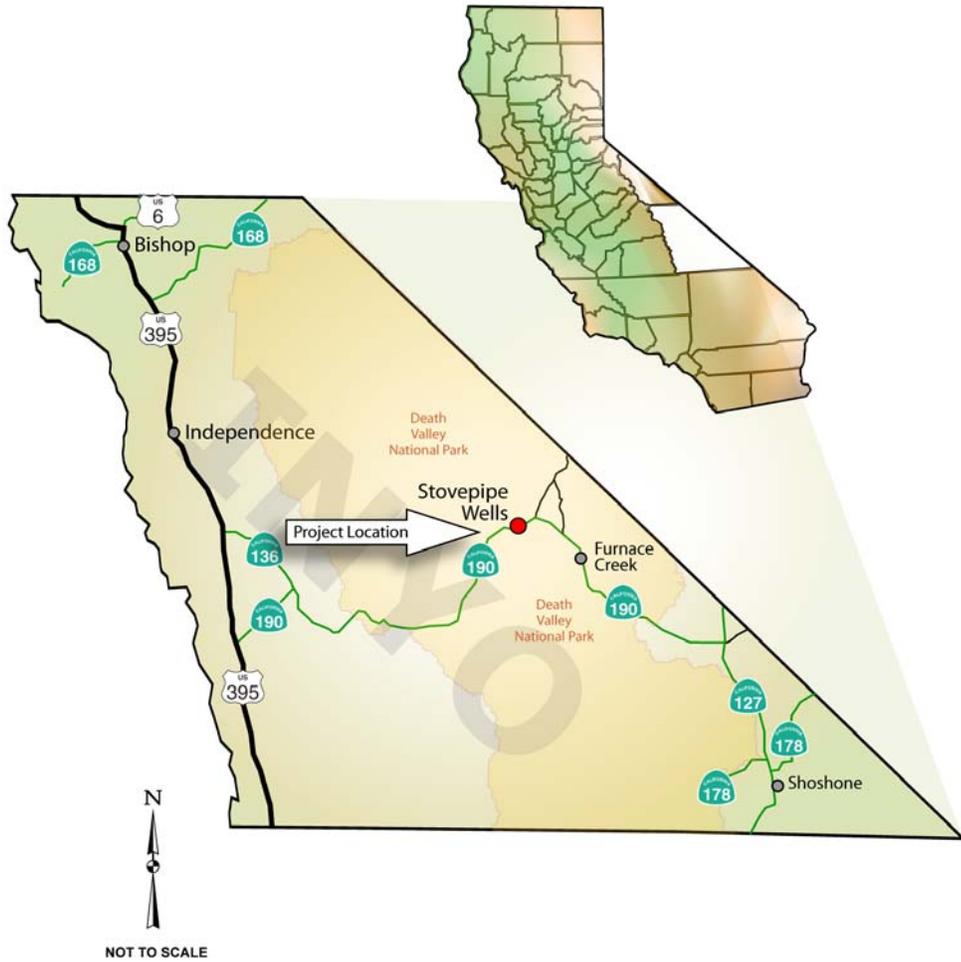
Surrounding Land Uses and Settings

The Stovepipe Wells Dunes area, also known as Mesquite Flat Dunes, is one of the most heavily visited and photographed sites in Death Valley National Park. The area is below sea level. The main plant community in the project area is creosote bush (*Larrea tridentata*) scrub, which is common at low elevations (such as valley floors) throughout the park.

No lands within the project area are designated as ecologically critical. The designated wilderness boundary lies next to the north edge of the proposed parking area and includes the Stovepipe Wells Dunes.

Other Public Agencies Whose Approvals Are Required

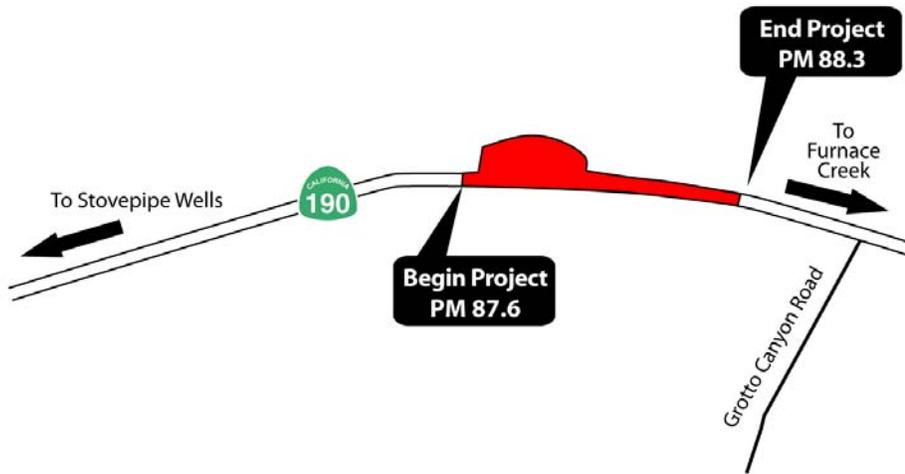
The National Park Service and Caltrans conducted public scoping in March 2006. The National Park Service circulated a federal Environmental Assessment for public comment in January 2007. The National Park Service, as Section 106 lead agency, consulted with the State Historic Preservation Office and received a finding of no effect in July 2007. The National Park Service filed a Finding of No Significant Impact in August 2007.



	Project Vicinity Map
	Stovepipe Wells Dunes Visitor Use Area Improvements Initial Study
	Inyo County
	09-INY-190-PM 87.6/88.3
	09-318100

RAM 0107 09-318100emrg

Project Vicinity Map



	Project Location Map
	Stovepipe Wells Dunes Visitor Use Area Improvements Initial Study
	Inyo County
	09-INY-190-PM 87.6/88.3
	09-318100

RAM 01/07 09-318100vmerg

Project Location Map

Section 2 Environmental Factors Potentially Affected

None of the environmental factors below would involve potentially significant impacts as indicated by the checklist on the following pages.

- Aesthetics
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology/Soils
- Hazards and Hazardous Materials
- Hydrology/Water Quality
- Land Use/Planning
- Mineral Resources
- Noise
- Population/Housing
- Public Services
- Recreation
- Transportation/Traffic
- Utilities/Service Systems
- Mandatory Findings of Significance

Section 3 Determination

On the basis of this determination:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Christine Cox-Kovacevich, Branch Chief
Office of Environmental Management, North
Central Region Environmental Planning
California Department of Transportation


Date

Section 4 Impacts Checklist

The impacts checklist starting on the next page identifies physical, biological, social, and economic factors that might be affected by the proposed project. Direct and indirect impacts are addressed in checklist items I through XVI. Mandatory Findings of Significance are discussed in item XVII. The California Environmental Quality Act impact levels include “potentially significant impact,” “less than significant impact with mitigation,” “less than significant impact,” and “no impact.”

A brief explanation of each California Environmental Quality Act checklist determination follows each checklist item. Lengthy explanations, if needed, are provided after the checklist.

Potentially significant impact	Less than significant impact with mitigation	Less than significant impact	No impact
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I. AESTHETICS — Would the project:

- a) Have a substantial adverse effect on a scenic vista?

Explanation: See additional explanations following the checklist.

- b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Explanation: No, the project would not affect scenic resources.

- c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Explanation: The parking lot is designed to blend in with the surrounding landscape. The parking lot is lower in elevation than the highway, minimizing its view from the highway (National Park Service Environmental Assessment/Assessment of Effect Stovepipe Wells Dunes Visitor Use Area Improvements, December 2006).

- d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

Explanation: The parking lot would reduce visual impacts from the existing situation where cars park on the side of the highway.

II. AGRICULTURE RESOURCES — In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Explanation: There is no farmland in the project area.

- b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

Potentially significant impact	Less than significant impact with mitigation	Less than significant impact	No impact
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Explanation: There is no land zoned for agriculture or Williamson Act contracts in the project area (State of California Farmland Mapping and Monitoring Program e-mail November 20, 2006).

- c) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

Explanation: There would be no effect on farmland due to the project. Reference II (a).

III. AIR QUALITY — Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

- a) Conflict with or obstruct implementation of the applicable air quality plan?

Explanation: No. The project would reduce dust because cars would not park on the dirt shoulder. During construction, if the contractor's activities would generate excessive dust, the exposed soil would be treated with water and/or other stabilizers to reduce dust (Caltrans Standard Specification for dust control).

- b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Explanation: See III (a).

- c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?

Explanation: The project would not result in a cumulatively considerable net increase of particulate matter under 10 microns in diameter (Personal communication with Dan Holland, Caltrans Air Quality Coordinator November 2007).

- d) Expose sensitive receptors to substantial pollutant concentrations?

Potentially significant impact	Less than significant impact with mitigation	Less than significant impact	No impact
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Explanation: There are no sensitive receptors in the project area. Access to the parking lot would be limited during construction.

e) Create objectionable odors affecting a substantial number of people?

Explanation: The project would not create objectionable odors.

IV. BIOLOGICAL RESOURCES — Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Explanation: See Additional Explanations following checklist.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Explanation: The project would not affect riparian habitat or any other sensitive plant community (National Park Service Botanical Survey Report October 2006 and January 18, 2006 site visit).

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Explanation: There are no wetlands in the project area, so the project would not affect wetlands (National Park Service Botanical Survey Report October 2006 and January 18, 2006 site visit).

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Explanation: Refer to IV (a).

Potentially significant impact	Less than significant impact with mitigation	Less than significant impact	No impact
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e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Explanation: No, the project would not conflict with any ordinances (National Park Service Botanical Survey Report October 2006 and National Park Service Environmental Assessment December 2006).

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Explanation: The project would not conflict with any habitat conservation plans (October 31, 2006 e-mail from National Park Service Biologist Linda Manning).

V. CULTURAL RESOURCES — Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Explanation: The project would not affect any historic properties (Caltrans Cultural Clearance Memorandum, August 7, 2007).

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Archaeological resources are considered “historical resources” and are covered under question V(a).

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Explanation: The project is underlain by recent Quaternary Fan Deposits and covered by sand dunes. No paleontological resources are likely in the project area (Caltrans Paleontology Scoping Memorandum May 17, 2007).

d) Disturb any human remains, including those interred outside of formal cemeteries?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Potentially significant impact	Less than significant impact with mitigation	Less than significant impact	No impact
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Explanation: If buried cultural materials were unearthed during construction, work would stop until a qualified Caltrans archaeologist could assess the significance of the find. If human remains were exposed during construction, work would stop until the county coroner could make the necessary findings as to origin and disposition of the remains per Public Resources Code 5097.98 (State Health and Safety Code 7050.5). See also explanation under V(a) above.

VI. GEOLOGY AND SOILS — Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Explanation: The project (a parking lot) does not pose a risk to structures or people due to seismic activity.

ii) Strong seismic ground shaking?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Explanation: See response to VI (a)(i) above.

iii) Seismic-related ground failure, including liquefaction?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Explanation: See response to VI (a)(i) above.

iv) Landslides?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Explanation: The parking lot would not affect the frequency of landslides or expose people or structures to landslides.

b) Result in substantial soil erosion or the loss of topsoil?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Potentially significant impact	Less than significant impact with mitigation	Less than significant impact	No impact
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Explanation: Runoff from the ramp, the access from State Route 190, would sheet-flow off (November 2006 e-mail from Caltrans design engineer, Nick Sprague). The water should dissipate quickly in the sandy soils, and depth to groundwater is deep. Runoff from the parking lot would drain to an area with rock slope outlet protection. Disturbed areas would be kept as small as practical during construction. Best management practices for drainage and sediment control would be implemented to prevent or reduce non-point source pollution and minimize soil loss and sedimentation in drainage areas.

- c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?

Explanation: The project would not cause the underlying geologic unit to become unstable.

- d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

Explanation: The project would not be located on expansive soil and would not create risks to life or property.

- e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Explanation: The National Park Service plans to install vault toilets that would be self-contained (November 2006 e-mail from Caltrans design engineer, Nick Sprague). Septic tanks would not be used.

VII. HAZARDS AND HAZARDOUS MATERIALS —

Would the project:

- a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Explanation: No hazardous materials would be associated with the project after construction. During construction, Caltrans would use construction best management practices to prevent the release of any hazardous materials into the environment.

- b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Potentially significant impact	Less than significant impact with mitigation	Less than significant impact	No impact
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Explanation: No hazardous materials would be associated with the parking lot after construction. Construction best management practices would be used to prevent release of hazardous materials into the environment. The public would be restricted from accessing the project area during construction.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Explanation: There are no schools within one-quarter mile of the project site (U.S. Geological Survey Stovepipe Wells and Grotto Canyon 7.5-minute quadrangle maps and January 18, 2006 site visit).

d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Explanation: There are no hazardous materials sites in the project area (U.S. Geological Survey Stovepipe Wells and Grotto Canyon 7.5-minute quadrangle maps and January 18, 2006 site visit).

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Explanation: A public airport is about 2.5 miles from the project site (U.S. Geological Survey Stovepipe Wells and Grotto Canyon 7.5-minute quadrangle maps and January 18, 2006 site visit). The project would not result in a public safety hazard; people currently visit the sand dunes for recreation; the airport is more than 2 miles from the sand dunes.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Explanation: There is no private airstrip in the vicinity (U.S. Geological Survey Stovepipe Wells and Grotto Canyon 7.5-minute quadrangle maps and January 18, 2006 site visit).

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Potentially significant impact	Less than significant impact with mitigation	Less than significant impact	No impact
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Explanation: The project would not interfere with an emergency response plan or emergency evacuation plan.

- h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Explanation: Due to lack of vegetation, wildland fires do not occur in the project area (January 18, 2006 site visit).

VIII. HYDROLOGY AND WATER QUALITY —
Would the project:

- a) Violate any water quality standards or waste discharge requirements?

Explanation: See Additional Explanations following checklist.

- b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?

Explanation: Although the area of the parking lot would no longer be available for groundwater recharge, that area is so small compared to the surrounding area that groundwater recharge would not be affected. The project would have no effect on groundwater supplies (November 2006 email from National Park Service hydrologist Terry Fisk).

- c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or offsite?

Explanation: Same as VIII (a).

- d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or offsite?

Potentially significant impact	Less than significant impact with mitigation	Less than significant impact	No impact
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Explanation: Construction of the parking lot would not substantially alter the existing drainage pattern. The project would not increase the flooding risk.

- e) Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

Explanation: The parking lot has a slight grade (following the topography) such that it drains to the northwest corner of the parking lot where there would be rock slope outlet protection. There is no storm water drainage system associated with the project, but the project is not likely to provide substantial sources of polluted runoff in the event of a storm.

- f) Otherwise substantially degrade water quality?

Explanation: The project would not have substantial negative effects on water quality.

- g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

Explanation: The project would not build any housing.

- h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?

Explanation: The area is classified as Zone C “Areas of Minimal Flooding” as delineated on the Federal Emergency Management Agency’s September 4, 1985 flood map (Caltrans 2006 Floodplain Evaluation Report and Location Hydraulics Study). The project’s parking lot structures would have a low profile. Limited runoff from the parking lot would have the velocity dissipated by the rock slope outlet protection. In the event of a flood, flood flow would be similar to what occurs now.

- i) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?

Explanation: The project would not expose people or structures to significant risk due to flooding.

- j) Result in inundation by a seiche, tsunami, or mudflow?

Potentially significant impact	Less than significant impact with mitigation	Less than significant impact	No impact
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Explanation: The project is not likely to result in inundation by a seiche or tsunami because such conditions do not apply to the project area. A mudflow is possible during or after a particularly severe storm; however, construction of the parking lot would have no effect on the possible inundation of the site by a mudflow (November 2006 email from National Park Service hydrologist Terry Fisk).

IX. LAND USE AND PLANNING — Would the project:

a) Physically divide an established community?

Explanation: No community lies in the project area. The project would not divide an established community.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Explanation: The project would not conflict with an existing land use plan.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

Explanation: The project would not conflict with a habitat conservation plan or natural community conservation plan.

X. MINERAL RESOURCES — Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Explanation: There are no known mineral resources in the project area; the project would not result in a loss of availability of minerals.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

Explanation: There are no known locally important mineral resources in the project area; the project would not result in a loss of availability of minerals.

XI. NOISE — Would the project result in:

Potentially significant impact	Less than significant impact with mitigation	Less than significant impact	No impact
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a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Explanation: Project construction, grading and paving the parking lot, installing curbs, and installing facilities (comfort stations and interpretive panels) and planting vegetation, would not generate excessive noise.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Explanation: Project construction, grading and paving the parking lot, installing curbs, installing facilities (comfort stations and interpretive panels), and planting vegetation, would not generate excessive groundborne vibration or groundborne noise.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Explanation: The project would not increase ambient noise levels. Currently, visitors park in the sand dunes area and photograph the dunes and/or hike into the dunes. Although the project would concentrate visitors at a trailhead and the parking lot, it would not substantially increase the number of visitors; visitors would then disperse into the dunes from the trailhead and parking lot.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Explanation: The project would not result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Explanation: A public airport is about 2.5 miles from the project site. The project would not result in a public safety hazard; people currently visit the sand dunes for recreation; the airport is more than 2 miles from the sand dunes.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Potentially significant impact	Less than significant impact with mitigation	Less than significant impact	No impact
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Explanation: There is no private airstrip in the vicinity.

XII. POPULATION AND HOUSING — Would the project:

- a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Explanation: The project would not induce population growth.

- b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

Explanation: There is no housing in the project area. The project would not affect housing.

- c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Explanation: The project would not displace anyone.

XIII. PUBLIC SERVICES —

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

- | | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| Fire protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Police protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Schools? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Parks? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Other public facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Potentially significant impact	Less than significant impact with mitigation	Less than significant impact	No impact
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Explanation: The project would not result in adverse impacts to governmental facilities or services.

XIV. RECREATION —

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Explanation: The project would not increase the use of recreational facilities, although a parking lot and trailhead would be added. The area is already frequented by park visitors.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

Explanation: The project does not include recreational facilities except for delineating a trailhead into the sand dunes.

XV. TRANSPORTATION/TRAFFIC — Would the project:

a) Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?

Explanation: The project would not increase traffic, but would better accommodate the existing traffic with a paved parking lot.

b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?

Explanation: The project would not increase traffic, but would better accommodate the existing traffic with a paved parking lot.

Potentially significant impact	Less than significant impact with mitigation	Less than significant impact	No impact
--------------------------------	--	------------------------------	-----------

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

Explanation: The project would not affect air traffic.

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

Explanation: The project would not increase hazards, but would improve the safety of visitors by allowing them to park in a parking lot, rather than on the dirt shoulders of the highway.

e) Result in inadequate emergency access?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Explanation: The project would not affect emergency access.

f) Result in inadequate parking capacity?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Explanation: The project would provide parking for existing visitors.

g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

Explanation: The project would not affect alternative transportation.

XVI. UTILITY AND SERVICE SYSTEMS — Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	-------------------------------------	--------------------------

Explanation: The project would produce minimal wastewater from the vault toilets, which would be transferred to the Furnace Creek sewer lagoons for treatment.

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	-------------------------------------	--------------------------

Potentially significant impact	Less than significant impact with mitigation	Less than significant impact	No impact
--------------------------------	--	------------------------------	-----------

Explanation: The project would produce minimal wastewater that could be treated with existing facilities.

- c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Explanation: Rock slope outlet protection would reduce velocity of storm water runoff from the parking lot. No environmental effects would result from the installation of the rock slope outlet protection (National Park Service Botanical Survey Report October 2006).

- d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Explanation: New or expanded water entitlements are not needed. Little or no water would be available at the parking lot.

- e) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Explanation: The National Park Service has said that it can service the planned facilities.

- f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Explanation: The National Park Service can accommodate the project's solid waste disposal needs.

- g) Comply with federal, state, and local statutes and regulations related to solid waste?

Explanation: The construction contractor and the National Park Service (post-project construction) would comply with federal, state, and local statutes related to solid waste.

Potentially significant impact	Less than significant impact with mitigation	Less than significant impact	No impact
--------------------------------	--	------------------------------	-----------

XVII. MANDATORY FINDINGS OF SIGNIFICANCE —

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Explanation: No (National Park Service Botanical Survey Report October 2006 and National Park Service Environmental Assessment, December 2006).

b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Explanation: This is the only known project in the area. Therefore, it is not likely that there would be cumulatively considerable impacts from the project.

c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

Explanation: The project would not cause substantial adverse effects to human beings.

References:

December 2006. National Park Service. Environmental Assessment/Assessment of Effect Stovepipe Wells Dunes Visitor Use Area Improvements.

Additional Explanations for Questions in the Impacts Checklist

Visual/Aesthetics

Affected Environment

State Route 190 in the project area is in Death Valley National Park. The proposed project is adjacent to State Route 190. The project area is approximately 2 miles east of Stovepipe Wells Village and is adjacent to the Stovepipe Wells Dunes. The Stovepipe Wells Dunes area, also known as Mesquite Flat Dunes, is one of the most heavily visited and photographed sites in Death Valley National Park. Vegetation in the area of the proposed project is creosote bush scrub community. The area is at the base of an alluvial fan.

Environmental Consequences

This project would have little impact on the visual quality of the surrounding regional view. The parking lot would be lower in elevation than the highway, minimizing its view from the highway. The view from the highway would be improved from the current situation where cars park on the sides of the highway in a dispersed manner. Currently, 25 to 30 vehicles park along the road shoulder on a busy day (40 to 60 vehicles in peak use). The proposed parking lot would concentrate vehicles (42 auto and 6 recreational vehicle spaces) in one area and minimize their effect on the surrounding view.

Avoidance, Minimization, and/or Mitigation Measures

The parking lot would have various aesthetic features to allow it to blend in with the surrounding landscape: colored concrete sidewalks, islands of native vegetation, and landscape boulders. Litter and trash in the area would be reduced with the installation of trashcans and self-contained vault toilets.

Water Quality and Storm Water Runoff

Affected Environment

Caltrans prepared a Floodplain Evaluation Report and Location Hydraulics Study (January 2006). There are no water bodies in the project area that would receive runoff from the project (January 18, 2006 site visit). The arid region receives less than 4 inches of rainfall per year. The project elevation is at sea level and slightly below. According to the Flood Insurance Rate Maps, none of the project area is situated in a

100-year floodplain. The upper elevations of the nearest watershed are at about 5,800 feet. This watershed boundary extends south approximately 5 miles from the site. District 9 storm damage records indicate that localized ponding has occurred in the past as rainfall gathered in the shoulder areas during brief thunderstorm events. No flooding or storm damage has occurred within the project limits because the water soon infiltrates or evaporates.

Environmental Consequences

Potential water quality impacts include increased concentrations of the types of pollutants commonly found in highway runoff, such as total suspended solids, nutrients (nitrogen/phosphorous), pesticides, metals, pathogens, litter, biochemical oxygen demand, and total dissolved solids. However, storm water runoff velocity would be reduced by rock slope outlet protection. There are no water bodies that would receive runoff. This would be an improvement over the existing situation where vehicles park on the dirt shoulders and potentially leak fluids into the environment.

Avoidance, Minimization, and/or Mitigation Measures

Best management practices would be followed during construction in accordance with the Caltrans general permit (Order No. 99-06-DWQ, NPDES No. CAS000003). Specific erosion control measures include:

- Construction zones outside of the existing disturbed area would be identified and fenced. The fencing would define the construction zone and confine activity to the minimum area required for construction.
- A hazardous spill plan would be in place, stating what action is to be taken in the case of a spill, as well as notification measures and preventive measures to be implemented, such as the placement of refueling facilities, storage, and handling of hazardous materials, etc.
- Where appropriate, “environmentally friendly” grease, hydraulic oil, and bar and chain oil would be used. These lubricants are vegetable or mineral oil based, less toxic, and biodegradable.

Plant Species

Affected Environment

The National Park Service prepared a Botanical Survey Report for the project (October 2006).

The only potential special-status species in the Stovepipe Wells Dunes area is the Death Valley sandpaper plant (*Petalonyx thurberi* ssp. *gilmanii*, California Native Plant Society List 1B, National Park Service sensitive). This species was not observed during the survey conducted October 12, 2006.

Environmental Consequences

The project would not likely affect the Death Valley sandpaper plant.

Avoidance, Minimization, and/or Mitigation Measures

Soil disturbance would be minimized. For the islands in the parking lot, native plants such as cacti may be planted. If so, watering may be required.

Because Death Valley sandpaper plant is not present in the project area, no mitigation for this species is required.

Invasive Species

Affected Environment

Skeletons of Russian thistle (*Salsola paulsenii*) were identified in the creosote plant community in the project area (National Park Service Botanical Survey Report, October 2006). The National Park Service botanist thinks these plants may have blown in from another area.

Environmental Consequences

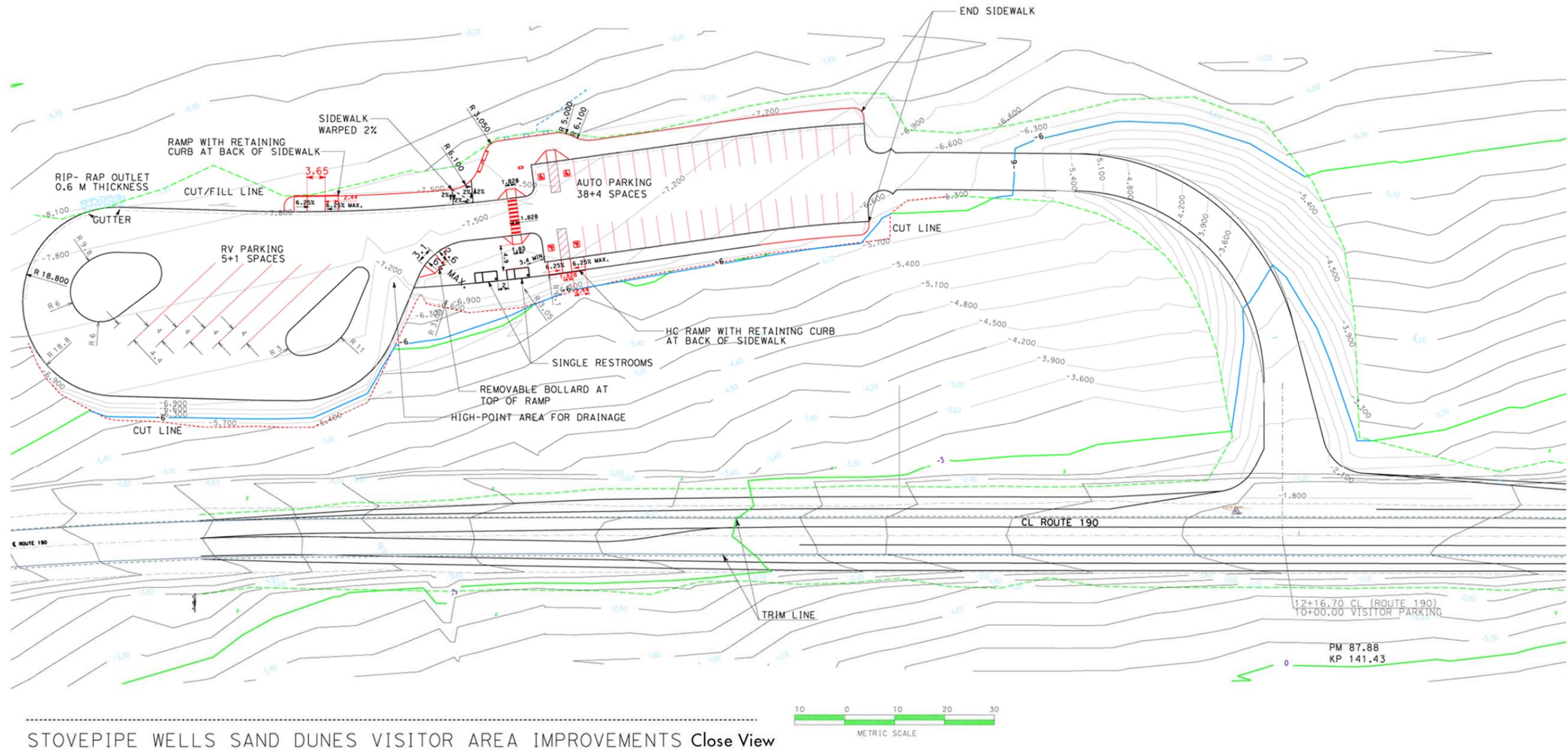
The project would not import any fill, so weed seed would not be brought in with fill material (personal communication with design engineer Nick Sprague, October 2007). The project would have a net export of material. However, construction and the associated disturbance would create areas of disturbance, which are more susceptible to invasion by exotic species such as the Russian thistle.

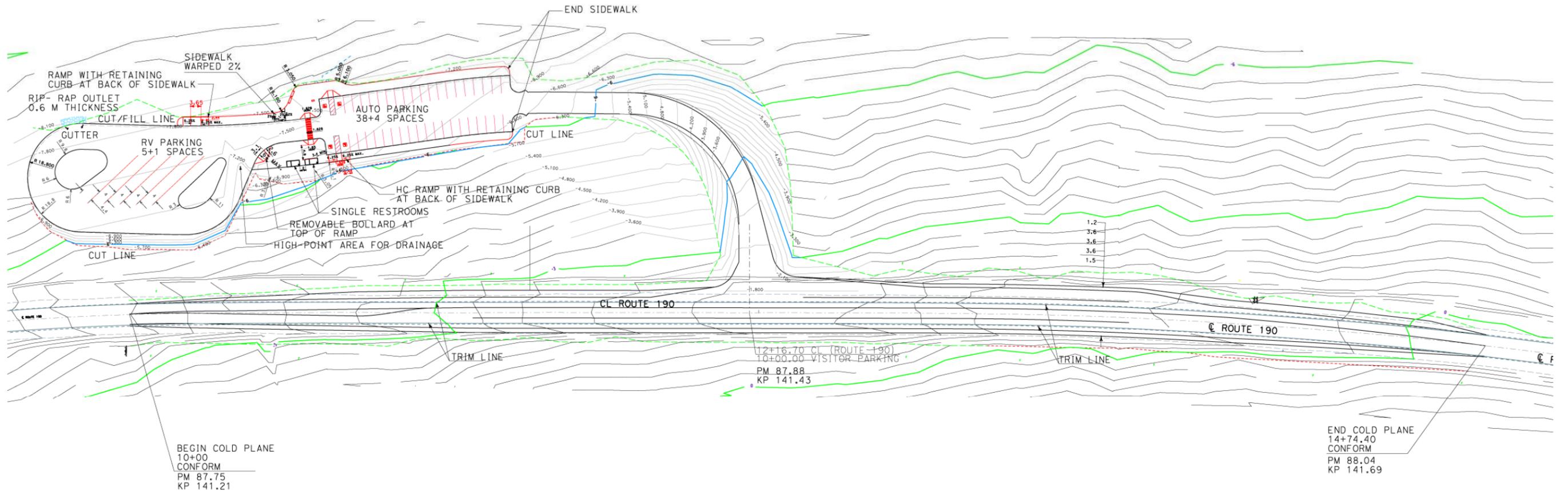
Avoidance, Minimization, and/or Mitigation Measures

Construction impacts would be minimized by using the following best management practices during construction:

- Minimize soil disturbance
- Pressure wash and/or steam clean all construction equipment to ensure that all equipment, machinery, rocks, gravel, or other materials are clean and weed-free before entering Death Valley National Park
- Cover all haul trucks bringing asphalt or other fill materials from outside the park to prevent seed transport
- Limit vehicle parking to existing roadways, parking lots, or access routes
- Obtain all fill, rock, or additional topsoil from the project area, if possible. If not possible, obtain weed-free sources from National Park Service-approved sources outside the park.

Appendix A Project Schematic





STOVEPIPE WELLS SAND DUNES VISITOR AREA IMPROVEMENTS Far View



Appendix B Comments and Responses

The Negative Declaration was circulated for public review and comment between January 11, 2008 and February 11, 2008. The document was sent to the California State Clearinghouse, Great Basin Unified Air Pollution Control District, National Park Service, the California Department of Fish and Game, and a member of the public who had commented on the federal document. Public notices were published in the Inyo Register and Mammoth Times twice during the public review period. The document was available for review at the Bishop library and the Caltrans District office in Bishop.

A letter was received from the California State Clearinghouse acknowledging Caltrans' compliance with the review requirement for draft environmental documents, per the California Environmental Quality Act. Caltrans received comment letters from the Lahontan Regional Water Quality Control Board and Janet Westbrook.

Letter from the State Clearinghouse



ARNOLD SCHWARZENEGGER
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



CYNTHIA BRYANT
DIRECTOR

February 6, 2008

Tom Dayak
California Department of Transportation, District 9
500 S. Main Street
Bishop, CA 93514-3423

Subject: Stovepipe Wells Dunes Visitor Use Area Improvements
SCH#: 2008011009

Dear Tom Dayak:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on February 5, 2008, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Letter from the State Clearinghouse (continued)

**Document Details Report
State Clearinghouse Data Base**

SCH# 2008011009
Project Title Stovepipe Wells Dunes Visitor Use Area Improvements
Lead Agency Caltrans #9

Type MN Mitigated Negative Declaration
Description D

Caltrans proposes to pave an access loop and parking lot and add an east bound turnlane off of State Route 190 at Stovepipe Wells Sand Dunes in Death Valley National Park. Caltrans would pave an 8' wide shoulder along the north side and a 5' wide shoulder and dike, along the south side of the highway.

Lead Agency Contact

Name Tom Dayak
Agency California Department of Transportation, District 9
Phone (760) 872-0690 **Fax**
email
Address 500 S. Main Street
City Bishop **State** CA **Zip** 93514-3423

Project Location

County Inyo
City
Region
Cross Streets Highway 190
Parcel No. 02-716-002
Township 15S **Range** 45E **Section** 32 **Base** Stovepip

Proximity to:

Highways 190
Airports Stovepipe Wells Airport
Railways
Waterways
Schools
Land Use Death Valley National Park

Project Issues Aesthetic/Visual; Air Quality; Biological Resources

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 6 (Inyo & Mono Region); Department of Parks and Recreation; Air Resources Board, Transportation Projects; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Regional Water Quality Control Bd., Region 6 (Victorville); Native American Heritage Commission

Date Received 01/07/2008 **Start of Review** 01/07/2008 **End of Review** 02/05/2008

Note: Blanks in data fields result from insufficient information provided by lead agency.

Comments from the Lahontan Regional Water Quality Control Board



California Regional Water Quality Control Board Lahontan Region



Linda S. Adams
Secretary for
Environmental Protection

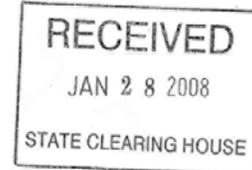
Victorville Office
14440 Civic Drive, Suite 200, Victorville, California 92392
(760) 241-6583 • Fax (760) 241-7308
<http://www.waterboards.ca.gov/lahontan>

Arnold Schwarzenegger
Governor

January 24, 2008

File: Environmental Doc Review
Inyo County

Tom Dayak, Branch Chief
California Department of Transportation, District 9
500 South Main Street
Bishop, CA 93514



Clear
2-5-08
e

COMMENTS ON THE NOTICE OF COMPLETION FOR THE PROPOSED IMPROVEMENTS TO THE STOVEPIPE WELLS DUNES VISITOR AREA, LOCATED ON THE NORTHEAST SIDE OF STATE ROUTE 190, IN THE STOVEPIPE WELLS VILLAGE IN DEATH VALLEY NATIONAL PARK, APN 02-716-002 (SCH # 2008011009)

Please refer to the items checked for staff comments on the above-referenced project:

- [X] The site plan for this project does not specifically identify features for the post-construction period that will control stormwater on-site or prevent pollutants from non-point sources from entering and degrading surface or ground waters. The foremost method of reducing impacts to watersheds from urban development is "Low Impact Development" (LID), the goals of which are maintaining a landscape functionally equivalent to predevelopment hydrologic conditions and minimal generation of nonpoint source pollutants. LID results in less surface runoff and potentially less impacts to receiving waters. Principles of LID include:
- Maintaining natural drainage paths and landscape features to slow and filter runoff and maximize groundwater recharge,
 - Reducing the impervious cover created by development and the associated transportation network, and
 - Managing runoff as close to the source as possible.

1

We understand that LID development practices that would maintain aquatic values could also reduce local infrastructure requirements and maintenance costs, and could benefit air quality, open space, and habitat. Planning tools to implement the above principles and manuals are available to provide specific guidance regarding LID.

We request you require these principles to be incorporated into the proposed project design. We request natural drainage patterns be maintained to the extent feasible. Future development plans should consider the following items:

- [X] The project requires development of a Stormwater Pollution Prevention Plan and
- a NPDES General Construction Stormwater Permit and/or
 - a NPDES General Industrial Stormwater Permit

2

California Environmental Protection Agency



Comments from the Lahontan Regional Water Quality Control Board (continued)

Tom Dayak

- 2 -

January 24, 2008

These permits are accessible on the State Board's Homepage (www.waterboards.ca.gov). Best Management Practices must be used to mitigate project impacts. The environmental document must describe the mitigation measures or Best Management Practices.

- [X] The proposal does not provide specific information on how impacts to surface Waters of the State and/or Waters of the U.S. will be mitigated. These surface waters include, but are not limited to, drainages, streams, washes, ponds, pools or wetlands. Waters of the State or Waters of the U.S. may be permanent or intermittent. Waters of the State may include waters determined to be isolated or otherwise non-jurisdictional by the Army Corps of Engineers. The Environmental Document needs to quantify these impacts. Discuss purpose of project, need for surface water disturbance, and alternatives (avoidance, minimize disturbances and mitigation). Mitigation must be identified in the environmental document including timing of construction.

3

Mitigation must replace functions and values of wetlands lost. For more information see the Lahontan Region Basin Plan http://www.waterboards.ca.gov/lahontan/BPlan/BPlan_Index.htm.

- [X] Other

- Please include both pre-construction and post construction stormwater management and best management practices (BMP) as part of planning process.
- Please consider designs that minimize impervious surface, such as permeable surface parking areas, directing runoff onto vegetated areas using curb cuts and rock swales, etc., and infiltrating runoff as close to the source as possible to avoid forming erosion channels. Design features should be incorporated to ensure that runoff is not concentrated by the proposed project. The project must incorporate measures to ensure that stormwater generated by the project is managed on-site both pre-and post construction. Please show on plan drawings the on-site stormwater control measures.
- If the proposed project is located in an area that contains drainages, wetlands, Waters of the State, Waters of the U.S. or blue-line stream, we request that measures be incorporated into the project to avoid these areas and provide buffer zones where possible. Please inform project proponent to consult with Army Corps of Engineers, Department of Fish and Game, and the Water Board prior to issuing a grading permit.
- Please map and delineate any wetlands and other surface Waters of the State and Waters of the U.S. (see above for definitions of surface Waters of the State and Waters of the U.S.).
- Please consider development features that span the drainage channels or allow for broad crossings. Design features of future development should be incorporated to

4

5

6

7

8

California Environmental Protection Agency



ensure that runoff is not concentrated by the proposed project, thereby causing downstream erosion.

- If the proposed project impacts and alters drainages, then we request that the project to be designed such that it would maintain existing drainage features and patterns to the extent feasible. Please inform project proponent to consult with Army Corps of Engineers, Department of Fish and Game, and the Water Board prior to issuing a grading permit.

9

Please note that obtaining a permit and conducting monitoring does not constitute adequate mitigation. Development and implementation of acceptable mitigation is required.

If you have any questions, please contact me at (760) 241-7376, or e-mail me at mhakakian@waterboards.ca.gov

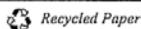
Sincerely,

Mack Hakakian
Mack Hakakian, PG
Engineering Geologist

cc: State Clearinghouse (SCH # 2008011009)

MH/rc/CEQA comments/Stovepipe Wells Sand Dunes Visitor Area Improvements

California Environmental Protection Agency



Responses to Comments from Lahontan Regional Water Quality Control Board

Response to Comment #1: Thank you for your comments. The project is consistent with “Low Impact Development,” maintaining a landscape functionally equivalent to predevelopment hydrologic conditions with minimal generation of non-point source pollutants. In Death Valley, the normal weather pattern is exceptionally little precipitation (less than 4 inches), with occasional large thunderstorms. In addition, the project watershed is not very large (less than 5 miles from the project site with upper elevations of 5,800 feet elevation). Therefore, storm water runoff is not expected to be substantial. The parking lot would have a couple cut-outs (islands), which would not be paved. In smaller rain events, rock slope outlet protection would dissipate runoff velocity. In large rain events, the project (or other storm water management practices) would not affect hydrology.

Response to Comment #2: Caltrans has a National Pollutant Discharge Elimination System General Construction Storm Water Permit (Order No. 99-06-DWQ, NPDES No. CAS000003). The contractor hired for this project would prepare a specific Storm Water Pollution Prevention Plan, which would be forwarded to your office. The plan would provide details of the specific best management practices chosen by the contractor to achieve storm water pollution prevention control. Best Management Practices described in the environmental document include placing rock slope outlet protection to slow velocities of storm water from the parking lot and applying water and/or other stabilizer to reduce dust if the contractor’s activities would generate excessive dust.

Response to Comment #3: There are no surface waters of the state within the project limits or that would be affected by the project (see pages 24-25 and Appendix A in this environmental document). As a valley and as the lowest point on the continental U.S., rain from storm events within Death Valley flow in myriad naturally occurring channels and rills (small shallow streams). These rains, though infrequent, are usually of high intensity and short duration. The proposed project would not alter the direction or the intensity of drainage from these naturally occurring storm events.

Response to Comment #4: Storm water management practices include parking all equipment on plastic to avoid any spills of petroleum products, keeping disturbed areas as small as practicable during construction, and limiting vehicle parking to existing roadways, parking lots, and access routes.

Response to Comment #5: Regarding a permeable parking surface, this surface would not provide benefit given Death Valley’s hydrologic pattern. Large rain events due to their

magnitude would sheet flow off the permeable parking surface and would not infiltrate into the permeable parking surface.

Response to Comment #6: See response to Comment #3. The project does not affect waters of the state or drainages. According to the Flood Insurance Rate maps, none of the project area is in a 100-year floodplain.

Response to Comment #7: See above response.

Response to Comment #8: The parking lot would be at the ground surface elevation and would not impede runoff.

Response to Comment #9: The rock slope outlet protection would not alter the existing drainage pattern (not concentrate run-off) in large rain events.

Comments from Janet Westbrook

P.O. Box 554
Ridgecrest, CA 93556-0554
8 February 2008

Tom Dayak
Eastern Sierra Environmental Branch Chief
500 S. Main Street
Bishop, CA 93514

Re: Notice of Intent to Adopt a Mitigated Negative Declaration
Stovepipe Wells Dune Visitor Use Area Improvements
State Route 190, Post miles 87.6 to 88.3

I have two concerns about this project, and I really wish it was located a bit either side of where you propose it. I visit this area often, but on my trip January 30-Feb. 3, I took photos specific to this project.

1

Your project description talks about a five-foot-wide shoulder and a 6" dike along 1550 ft. the south side of SR 190. In this location, the area looks like this:



Looking upslope to the south, this huge alluvial fan out of Grotto Canyon is subject to sheet-flooding and where it nears the road, there are many rivulets that have been cut when it rains. It doesn't rain here often, but when it does, it generally pours, causing rapid runoff for a short period. Both photos show my rear-view mirror and you can see how steep these banks are right at the roadside. Be careful how you cut into this part of the fan, and be sure to allow the little rivers to do what they need to do to cross the road. A 6" dike isn't going to do much of anything considering the bank is over 3 feet high, and especially 1550 ft. of continuous 6" dike. The rains will wash gravels down over it the first time it rains. Please rethink your upslope treatment. Allow for water to cross the road where it wants to. It might be better without any dike at all so the water can cross the road, and it will be easier to push the gravels back off the roadside.

2

Environmental Factors Potentially Affected; since this list is made for urban areas, it is hard to argue with any of the aspects to consider except the primary one – aesthetics. There will be disturbance of the soils until new drainage patterns establish themselves, but other matters are probably negligible using this list.

3

Comments from Janet Westbrook (continued)

However, this lovely view will no longer be possible:



There will be a huge parking lot in front of this view. The parking lot will stop short of the actual sand dunes, but from down there, it is not possible to get THIS shot of the dunes as you are well below the nearest sand hills. The only way to get an overall shot of the whole scene is from the roadside. Now we will be looking over 40 vehicles right in this spot. At least when vehicles are parked, as they do now, along side the road, it is possible to stand between them and get a nice unobstructed view of the dunes as I did with these shots, but with the lot down there, that won't be possible. So #1 Aesthetics should have the first box marked "potentially significant impact". The only way to mitigate that would be to move the parking lot one mile either direction from the central "best photo" location where I took these shots. It definitely "affects scenic resources". Even if it is empty of vehicles, the parking lot will still be down there, in front of the first sand dunes, which would "substantially degrade the existing visual character and quality of the site and its surroundings." If it were one mile west of the proposed site, the alluvial fan wall on the south side of the road isn't as tall there either, and drainage would work out better.

4

You plan to plant "cacti" in the planter area in the parking lot. In the area now, there are NO cacti, only Creosote bushes. Deserts aren't all sand and cactus. Be careful what you do wind up planting. Creosote bushes are very difficult if not impossible to transplant. There are very few cacti native to these low hot areas of Death Valley.

5

Is this project really necessary? Could "safety" be addressed by simple lowering the speed limit in the area? No one has been hurt in the area. Line-of-sight is very good in the best spots for photography, and with the quietness of the desert, it is very easy to hear approaching vehicles. People have been very careful crossing the road when I've been parked along the road. The shoulders on both sides are very hard-packed now, and pose no problems with multiple vehicles parking there. Why spoil a very pretty place with a parking lot in the viewshed??

6

Thank you for considering my thoughts,

Janet Westbrook
jwest@ridgenet.net

Responses to Comments from Janet Westbrook

Response to Comment #1: Thank you for your comments. Regarding the project location, locations to the east and west were considered. However, these locations were far enough away from the dunes that they would not provide easy access.

Response to Comment #2: The primary purpose of the dike is to encourage people to park in the parking lot instead of along the dirt shoulders. The dike would not alter hydrology (prevent sheet flow across the highway) in large rain events.

Response to Comment #3: Aesthetics were considered to be a less than significant impact. Minimization features, such as coloring the sidewalks and having natural islands, were incorporated into the project to reduce potential visual effects. The project would not affect hydrology.

Response to Comment #4: Regarding placement of the project, as stated in the response to comment #1, other locations were not close enough to the sand dunes to assure that visitors would use the parking lot. While the parking area will be in the foreground view from the roadway, current views of the dunes are also blocked by a string of cars parked on the shoulder of the road. The project will provide convenient, safe parking and sidewalks leading to viewing areas that would be on the dunes' side of the parking lot. This will give visitors an unobstructed view of the dunes. The parking lot would not affect hydrology in the most common, large rain events.

Response to Comment #5: The demonstration garden idea came from your comments on the federal Environmental Assessment (circulated for public review in January 2007). Instead of trying to plant creosote, which has large spaces between plants, we are considering using boulders and cacti. However to assure native species and materials, rather than include specifications in the Caltrans' construction contract, the National Park Service at Death Valley National Park will provide materials for the cut-outs after the parking lot construction.

Response to Comment #6: The project would improve safety and reduce environmental impacts associated with dispersed parking. Currently, cars park randomly on the dirt shoulders and pedestrians walk across and along the highway looking for vantage points. This project would encourage the visitors to park off the highway and would reduce the number of pedestrians that could come in conflict with traffic on the state highway. While it may be possible for cars to park on the shoulders, it is more difficult and less safe for larger vehicles such as buses to park on the dirt shoulders. Environmental impacts that would be

reduced include dust generated by cars parking on the dirt shoulders, litter, and impacts to vegetation.