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Environmental Assessment
Grays Well Road and Gecko Road Improvements
Imperial County, California

U.S. Department of the Interior
Bureau of Land Management
El Centro Field Office
1661 South 4th Street
El Centro, California



August 2015

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1. Introduction

Background

This Environmental Assessment (EA) documents the evaluation of planned road improvements for two roads within the Imperial Sand Dunes Recreation Area (ISDRA) located in Imperial County, California. The project is proposed by the Bureau of Land Management (BLM) El Centro Field Office and the Federal Highway Administration, Central Federal Lands Highway Division (FHWA-CFLHD). The 5.1-mile Grays Well Road and the 7.7-mile Gecko Road would be improved, depending on funding availability. The existing Grays Well Road network includes Luis Aguilar Road, Buttercup Campgrounds, and Plank Road. The existing Gecko Road network includes Gecko Road Campground, Keyhole Campground, and Roadrunner Campground.

This EA analyzes the environmental impacts and mitigation for surface improvements and reconstruction of vehicle pullouts, parking areas, and campgrounds for Grays Well Road and Gecko Road, collectively referred to as the Proposed Action. Following the requirements of the National Environmental Policy Act (NEPA) (40 CFR 1508.9 (a)), this EA describes the potential impacts of a No-Action Alternative and the Proposed Action for each of the road improvements. If the BLM determines that the Proposed Action for these roads is not expected to have major effects, a Finding of No Significant Impact (FONSI) will be issued and a Decision Record will be prepared. If significant effects are anticipated, the BLM will prepare an Environmental Impact Statement (EIS).

Identifying Information

- Project: Grays Well Road and Gecko Road Improvements
- CFLHD Project Number: CA FTBL 67113 (1)—Grays Well Road
- CFLHD Project Number: CA FTBL 67110 (1)—Gecko Road
- Environmental Assessment Prepared: August 2015

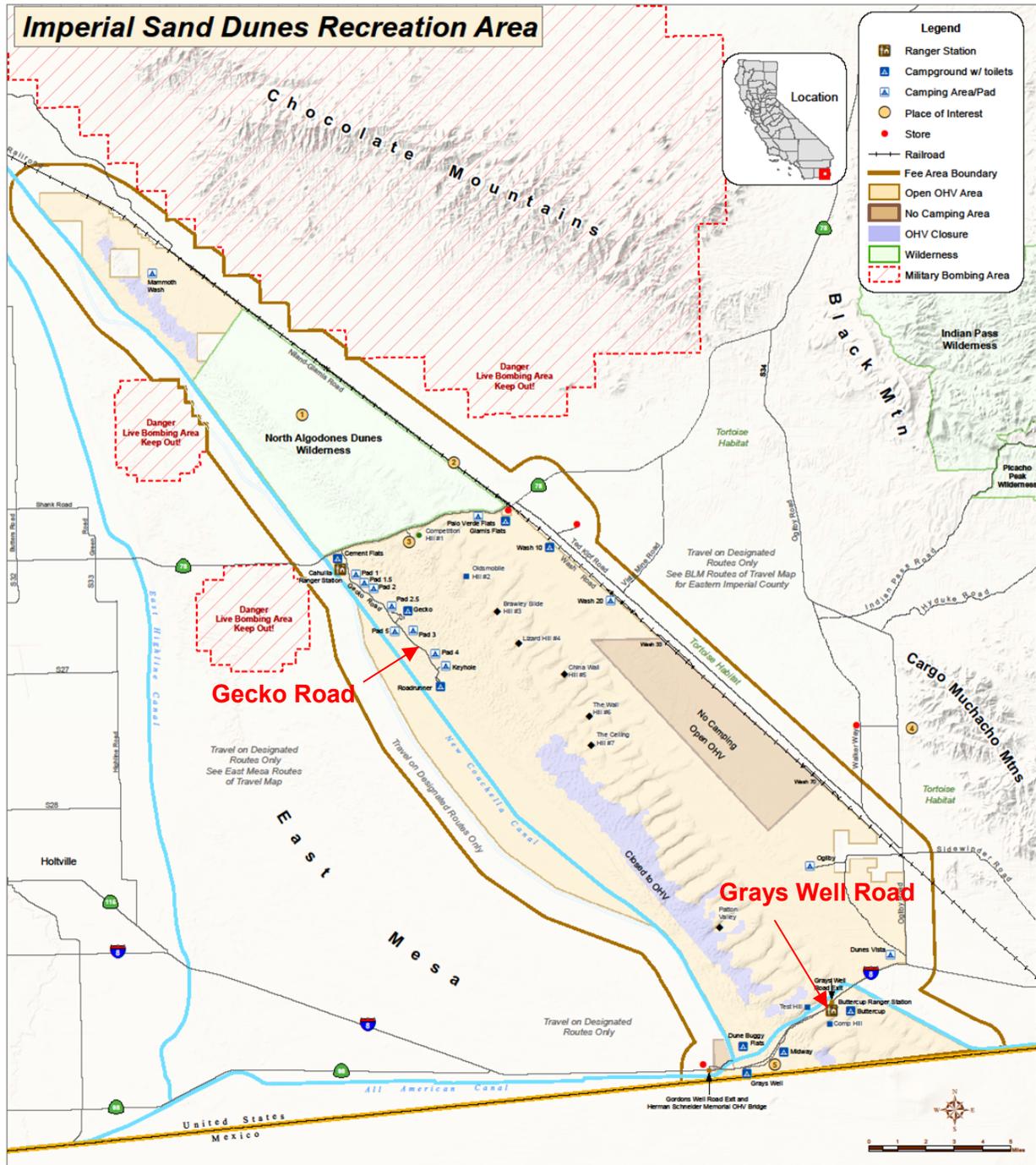
Name and Location of Preparing Office

Bureau of Land Management
El Centro Field Office
1661 South 4th Street
El Centro, California 92243

Location of the Project

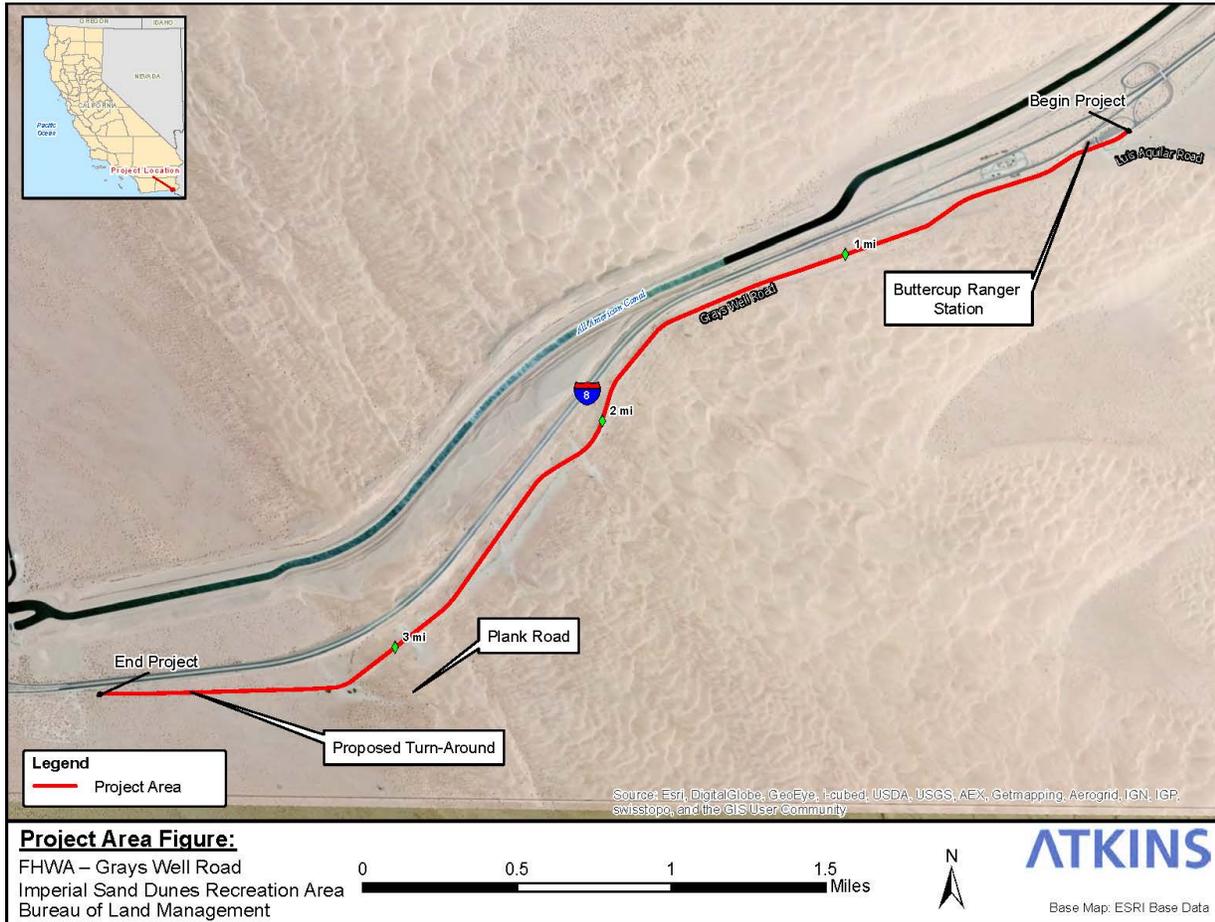
As shown in Figure 1, the existing paved Grays Well Road and Gecko Road networks are located within the ISDRA in southeastern California near the international border with Mexico. The roads provide access to portions of the 164,000-acre recreation area, which has been designated as a Special Recreation Management Area (SRMA). ISDRA is within the California Desert Conservation Area (CDCA) and is considered one of the premier off-highway vehicle (OHV) locations in the United States. Both roads provide easily accessible recreational opportunities for outdoor enthusiasts.

Figure 1. Vicinity Map



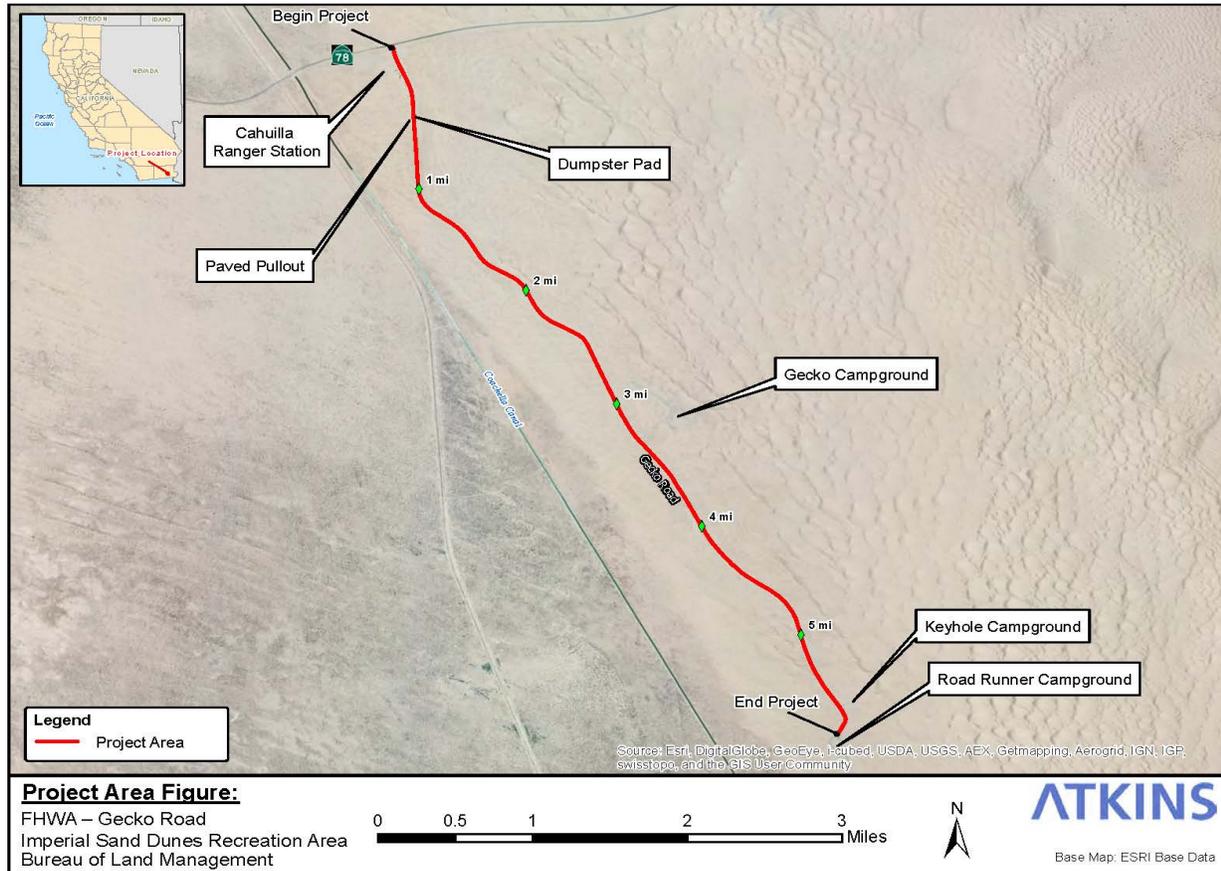
Grays Well Road is situated between the international border with Mexico and Interstate 8 (I-8). The project site is off I-8 and provides access to Buttercup Ranger Station, Midway Campground, Luis Aguilar Road (Keyhole Road), and Grays Well Campground. The network also provides access to the Plank Road, a historical remnant of the unique “floating” wooden road built in 1916. Figure 2 shows the Grays Well Road project area.

Figure 2. Grays Well Road Project Area Limits



The Gecko Road network is located off California Highway 78 (CA Hwy 78) and provides access to the Cahuilla Ranger Station and the Gecko, Keyhole, and Roadrunner campgrounds. The site is bounded by the ISDRA on the east, the New Coachella Canal on the west, the Mexican border on the south, and the North Algodones Dunes Wilderness to the north. Figure 3 shows the project limits of Gecko Road.

Figure 3. Gecko Road Project Area Limits



Visitor Information

The ISDRA provides public access to an average of 1.1 million visitors during a seven-month peak season. For the ISDRA, peak season is considered to be October through April, since the heat level is considered relatively moderate during these months. The highest visitor usage at the ISDRA is typically documented on four holidays: Halloween, Thanksgiving, New Year's Day, and Presidents' Day.

In addition to offering OHV activities, the ISDRA offers a wide spectrum of recreational opportunities for visitors. According to the ISDRA Recreation Area Management Plan (RAMP), these activities include hiking, wildlife and scenery viewing, picnicking, photography, nature study and environmental education, camping, sightseeing, and driving for pleasure. The wide-open spaces offer places for those visitors seeking solitude.

Visitor areas accessed by Grays Well Road include Buttercup, Midway, and the Plank Road camping areas. All three campgrounds have vault toilets and trash dumpsters. Gecko Road visitor areas provide access to eight hard-packed camping areas and three campgrounds, including Gecko Campground, Roadrunner Campground, and Keyhole Campground. Vault toilets are located at Gecko and Roadrunner Campgrounds, Cement Flats, and near the Cahuilla Ranger Station.

Purpose and Need

The purpose of this project is to address road degradation issues and improve subgrade problems, including the associated campground site roads, by designing a pavement solution with a design life of 20 years.

Both roads are experiencing block cracking and high-severity thermal transverse cracking in the asphalt pavement. On the Grays Well Road network, there are displaced chunks of pavement, potholes, and significant pavement edge drop-offs from OHVs and recreational vehicles entering and exiting the road. Several locations have steep foreslopes and minimal shoulders, and existing asphalt pavement depths appear to have inconsistent pavement structure.

Road widening and the addition of three-foot gravel shoulders are needed at some locations to prevent further degradation of the slope and provide a uniform width of roadway and shoulders along the Grays Well Road network. Additionally, pavement markings throughout the project area have faded centerlines and edge lines.

The Gecko Road network has places where a loss of material at the pavement edges has occurred due to wind events. Road widening is needed at some locations to prevent further degradation of the slope and provide a uniform width and shoulders along Gecko Road. Pavement markings throughout the project area have faded centerlines and edge lines. For both roads, the BLM would like to replace symbols and pavement markings. All standard regulatory and warning signs need to be replaced to meet current retro-reflectivity requirements.

The need for the improvements to the Grays Well Road and Gecko Road networks is to maintain and improve safe access for visitors, law enforcement personnel, and fire and rescue teams throughout the ISDRA by rehabilitating the road to address pavement problems, meet American Association of State Highway and Transportation Officials (AASHTO) width standards, and adhere to the Manual on Uniform Traffic Control Devices (MUTCD) standards for signs and striping.

Decision to be Made

The decision to be made is whether to approve, not approve, or approve with modifications the proposed Grays Well Road and Gecko Road network improvements described in this document.

Conformance Summary

There are a variety of plans that guide management decisions for “routes of travel” through the ISDRA. Below is a list of plans with a discussion on how the proposed Grays Well Road and Gecko Road improvements conform to each plan.

California Desert Conservation Area (CDCA) Plan, 1980, as Amended

The ISDRA is a 215,000-acre recreation area contained within the 25-million acre CDCA. The purpose of the CDCA Plan is to establish guidance for the management of the public lands of the California desert by the BLM in accordance with the 1976 Federal Land Policy Management Act (FLPMA). There is a Motorized-Vehicle Access Element to the CDCA Plan with goals for providing a system and set of rules governing access to the CDCA by motor vehicles.

The proposed Grays Well Road and Gecko Road improvements are consistent with the CDCA Plan by providing motorized vehicle access on the existing road network, thereby balancing the needs of all desert users while avoiding adverse impacts to desert resources.

Imperial Sand Dunes Proposed RAMP/CDCA Plan Amendment and Final EIS, June 2013

The ISDRA RAMP and Record of Decision (ROD) were completed in June 2013. According to the ROD, the Grays Well Road network and the Gecko Road network have been designated as BLM “routes of travel” and are limited to street-legal vehicles only. Goals, objectives, and management actions are included in the document that address ways to minimize impacts to sensitive resources, reduce conflict between users, and provide for visitor safety.

The proposed Grays Well Road and Gecko Road improvements constitute a rehabilitation, restoration, and resurfacing project that is consistent with the Final EIS and ROD because it will maintain and improve visitor access in the ISDRA.

Scoping

On May 6 to May 8, 2014, a scoping trip was conducted with staff from BLM, FHWA-CFLHD, and Atkins, the design consultant. There was an office meeting, followed by a field review meeting. The findings of the scoping trip were documented in the Grays Well Road Project Delivery Plan and the Gecko Road Project Delivery Plan. Both documents were prepared by FHWA-CFLHD and dated August 5, 2014. These plans were used to formulate the purpose and need for this project, identify reasonable build alternatives, and determine the appropriate level of documentation. The environmental issues identified include the following:

- Federally protected species in the ISDRA include:
 - *Gopherus agassizii* (Desert Tortoise)—threatened
 - *Astragalus magdalenae* var. *peirsonii* (Pierson’s Milk-Vetch)—threatened
- BLM special-status species in the ISDRA include:
 - *Uma notata* (Colorado Desert Fringe-Toed Lizard)
 - *Phrynosoma mcalli* (Flat-Tailed Horned Lizard (FTHL))

- *Palafoxia arida* var. *gigantea* (Giant Spanish Needle)
- California endangered species in the ISDRA include:
 - *Helianthus niveus* ssp. *Tephrodes* (Algodones Dunes Sunflower)—state endangered
 - *Croton wigginsii* (Wiggin’s Croton)—state rare species
- The project qualifies for a Section 4(f) Exception for Federal Lands Transportation Facilities under Section 1119(c)(2) of the Moving Ahead for Progress in the 21st Century Act (MAP-21), signed by President Obama on July 6, 2012. Grays Well Road and Gecko Road are federal lands transportation facilities included in the comprehensive national inventory of public roads as defined in Section 1103(a)(3) of MAP-21 (23 USC 101(a)(8)).
- Historic Resource Issues:
 - For Grays Well Road—
 - California Register of Historic Places Resources in the project area includes Plank Road, a California Historical Landmark that has been nominated for listing in the National Register of Historic Places. This is a unique “floating” wooden road that was built in 1916. The road is a BLM Area of Critical Environmental Concern (ACEC).

2. Proposed Action and Alternatives

To minimize impacts to the natural environment and keep project costs to a minimum, the BLM will generally keep both roads on their existing alignments, recycle the existing pavement, and replace with pavement with a 20-year design life. The No-Action and Proposed Action alternatives for each road are described below. Additional alternatives were considered but eliminated from detailed analysis. A discussion of eliminated alternatives follows the description of the Proposed Action Alternative.

No-Action Alternative

Under the No-Action Alternative, the proposed improvements to the Grays Well Road and the Gecko Road networks would not be made. The roads would be maintained using current practices with the potential for maintenance costs to increase to address ongoing pavement cracking and a continued reduction of shoulders due to a loss of pavement. Road markings would continue to be repainted periodically using standard waterborne paint that would be subject to periodic fading. Signs would not be replaced to meet current reflectivity requirements.

Proposed Action Alternative

No improvements associated with the Proposed Action Alternative will involve new surface disturbance of previously undisturbed soils. Construction activities, staging areas, and turnaround locations for vehicles will be conducted in areas that were disturbed when the Grays Well Road and Gecko Road networks were originally constructed and at camp pads, parking areas, ranger stations, and dumpster pads. Since being built, the roadsides have been used extensively for camping, OHV recreation, and other related activities.

The construction schedule will depend on available funding for the project. For the purpose of this EA, construction is assumed to have a duration of one to five years, with activities occurring only during each construction season.

The Proposed Action for both roads involves the following steps:

- Pulverizing the existing asphalt pavement, cement-treated base, aggregate base, and subgrade
- Compacting the pulverized material in place
- Adding three inches of new asphalt concrete pavement
- Widening at spot locations to provide a uniform width of 26 feet of paved section consisting of two 12-foot travel lanes and two one-foot paved shoulders
- Removing all standard regulatory and warning signs and replacing to meet current standards
- Repainting road centerlines and edge lines
- Using clean vehicles free from sediment and debris during construction to limit the spread of noxious weeds and to avoid introduction of invasive plant species

Additional elements for the Grays Well Road network improvements include:

- Rehabilitating parking areas for Buttercup Campground
- Adding a 55-foot radius turnaround at milepost (MP) 3.88

- Providing pedestrian and emergency vehicle access by designating a no-parking section of road near the Buttercup Ranger Station
- Providing accessible parking spots, as needed, per the Americans with Disabilities Act (ADA)
- Widening Luis Aguilar Road to a uniform 24 feet (two 10-foot lanes with two three-foot gravel shoulders)
- Removing and replacing post and cable fence near Buttercup Ranger Station

Additional elements for the Gecko Road network improvements include:

- Widening two-way campground roads to a uniform 24 feet (two 10-foot lanes with two two-foot shoulders)
- Widening one-way campground roads to a uniform width of 14 feet (a 12-foot lane and two one-foot paved shoulders)
- Adding a 5 or 10-foot pavement apron to five camp pads adjacent to the road for the purpose of stabilizing the edge-of-road pavement
- Adding new pavement at the trash dump site (Station 126+00 to 130+00)
- Rehabilitating five roadside parking areas
- Adding base and pavement to the existing turnaround at the Keyhole Campground
- Improving the Roadrunner Campground to maintain 36 feet wide roadside parking
- Rehabilitating the parking area near Cahuilla Ranger Station to include ADA parking spots
- Formalizing the pedestrian crosswalk near the Cahuilla Ranger Station

Alternatives Considered but Eliminated from Detailed Analysis

Grays Well Road Eliminated Alternatives

According to the Geotechnical Field Investigation Summary (Yeh, 2015a), a key factor influencing the pavement design for the Grays Well Road network is the extensive raveling of the pavement surface, highly developed block and transverse cracking, and aging and weathering of the asphalt in a dry environment. The following alternative was considered, evaluated, and dismissed for the reasons described in the table below.

Table 1. Eliminated Pavement Alternative for Grays Well Road

Alternative ¹	Description	Evaluation
Grind and Fill with an Interlayer	This alternative would remove three inches of the existing asphalt pavement by grinding and then place a 0.75-inch interlayer (such as a rubberized hot mix) over the exposed asphalt.	Eliminated from further consideration because of performance issues and costs. The performance of the FDR alternative is expected to be superior to the grind and fill alternative because the potential for reflective cracking to occur is reduced by providing a more flexible pavement structure. Additionally, the FDR (the Proposed Action) has a lower estimated relative cost of \$21.50/ square yard versus a higher cost of \$28.00/ square

		yard for the Grind and Fill pavement alternative.
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¹Yeh, 2015c

Gecko Road Eliminated Alternatives

Key factors influencing the pavement design for the Gecko Road network include the extensive raveling of the pavement surface, highly developed block and transverse cracking, and aging and weathering of the asphalt in a dry environment. For Gecko Road, the following alternatives were considered, evaluated, and dismissed for the reasons described in the table below.

Table 2. Eliminated Pavement Alternatives for Gecko Road

Alternative¹	Description	Evaluation
Grind and Mill with an Interlayer	<ol style="list-style-type: none"> 1. Grind existing pavement to a minimum depth of three inches 2. Place rubberized interlayer on exposed surface 3. Place new hot asphalt concrete pavement (HACP) 4. New section is placed over the existing cement-treated sand (CTS) and any remaining asphalt pavement. 	<p>Eliminated from further consideration because of performance issues and costs. The potential for reflective cracking due to an inflexible pavement structure is greater than with the Crack and Seat or the FDR technique.</p> <p>The estimated relative cost for this alternative is \$28/ square yard, which is lower than the Crack and Seat alternative at \$31.50/ square yard but higher than the \$20/ square yard estimate for the FDR.</p>
Crack and Seat	<ol style="list-style-type: none"> 1. Grind existing pavement to a minimum depth of three inches 2. Crack and seat (a system of dropping a weight on the exposed surface to crack the CTS into about 12-inch blocks and seat it firmly on the subgrade while retaining aggregate interlock between the joints). Broken CTS then is seated into the foundation using several passes of a pneumatic roller. 3. Place new HACP 	<p>Eliminated from further consideration due to cost, despite the potential for reflective cracking to occur being reduced by providing a more flexible pavement structure than the Grind and Mill technique can provide. The FDR technique is expected to perform as well as the Crack and Seat technique but the approximate cost per square yard for the Crack and Seat is \$31.50 versus the FDR cost of \$20.</p>

¹Yeh, 2015b; Yeh, 2015d.

3. Affected Environment and Environmental Effects

Both Grays Well Road and Gecko Road are located in the ISDRA in similar environmental settings. A review of the natural and man-made resources surrounding each road indicates that many resources are common to both roads. The only differences between the resources are Cultural Resources, Threatened and Endangered Species, Utilities, and Water Quality.

This section discusses the resources that have been reviewed for each road and whether they would be potentially affected by either the proposed Grays Well Road or Gecko Road improvements. Table 3 presents the rationale for these determinations. Resources that are not present, and resources that are present but not affected, will not be discussed further in this EA. Resources that are present and may be affected are analyzed in more detail in this section. Mitigation measures for impacted resources are discussed for each resource, for each road, and summarized in Appendixes A through C.

Affected Resources for Both Grays Well Road and Gecko Road

Table 3. Affected Resources for Grays Well Road and Gecko Road

Resource	Not Present	Present/ Not Affected	Present/ May Be Affected	Rationale for Determination
Air Quality			X	Fugitive emissions and dust from construction activities could occur.
Coastal Areas	X			There are no coastal areas in the project limits.
Farmlands	X			There are no farmlands in the study area.
Floodplains	X			There are no floodplains in the project area.
Geology/Soils			X	Coring and drilling activities could affect geology and soils in the project area.
Hazardous Substances			X	No hazardous waste concerns have been identified in the project area; however, discovery or release of hazardous waste could occur during construction.
Land Use		X		The project will not affect land use in the project area.
Noise		X		There could be a temporary increase in construction-related noise in each segment where work is being conducted, but no long-term effects are expected.

Resource	Not Present	Present/ Not Affected	Present/ May Be Affected	Rationale for Determination
Noxious Weeds			X	Noxious weeds are anticipated in the areas to be disturbed (construction footprint) for the road improvements.
Recreation			X	Recreation vehicle (RV) and OHV users and other recreation area visitors could be impacted during construction of the project.
Right of Way		X		No acquisition of right of way is anticipated.
Section 4(f) Resources		X		This qualifies as a Section 4(f) Exception for Federal Lands Transportation Facilities under Section 1119(c)(2) of MAP-21.
Section 6(f) Resources ¹	X			No Section 6(f) resources are present in the project area.
Social and Economic Resources	X			There are no permanent residents or established businesses in the ISDRA. Therefore, no impacts to these resources are anticipated.
Vegetation		X		Limited vegetation is expected to be disturbed in the areas (construction footprint) for the road improvements.
Invasive Plant Species			X	Two invasive plant species, Sahara mustard (<i>Brassica tournefortii</i>) and Russian thistle (<i>Salsola tragus</i>) were detected in the project area.
Visual Quality		X		Other than changes in the visual environment during construction, the project is not anticipated to impact the visual environment.
Wetlands and Waters of the U.S.	X			No wetlands or waters of the U.S. have been identified in the project area.
Wild and Scenic Rivers	X			No wild and scenic rivers are located in the project area.
Wilderness Area		X		The North Algodones Dunes Wilderness Area is north of CA Hwy 78 and northwest of the project area (see Figure 1). Construction activities for the project are not expected to impact this area.

³Section 6(f) of the Land and Water Conservation Fund Act (16 USC §4601-4) was enacted to preserve, develop, and assure accessibility to outdoor recreation resources. Section 6(f) resources are properties purchased or improved using these funds. If Section 6(f) resources are to be converted to another use, replacement in kind usually is required.

Air Quality

Affected Environment for the Grays Well Road and Gecko Road Networks

Under the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has established national ambient air quality standards (NAAQS) to protect public health and the environment. Pollutants evaluated under the NAAQS include: carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO₂), ozone (O₃), particulate matter (PM₁₀ and PM_{2.5}), and sulfur dioxide (SO₂). The project is located in Imperial County, which is designated as non-attainment for particulate matter (PM₁₀ and PM_{2.5}).

Environmental Effects of the No-Action Alternative for the Grays Well Road and Gecko Road Networks

Under the No-Action Alternative, none of the elements of the proposed project would be constructed and no project-related impacts to air quality would occur.

Environmental Effects of the Proposed Action for the Grays Well Road and Gecko Road Networks

The Proposed Action addresses rehabilitation, restoration, and resurfacing of the existing Grays Well and Gecko Road networks and associated campground site roads, spot improvements to shoulders, and signing and restriping road symbols. According to 40 CFR 93.126, exempt projects:

“Notwithstanding the other requirements of this subpart, highway and transit projects of the types listed in table 2 of this section are exempt from the requirement to determine conformity. Such projects may proceed toward implementation even in the absence of a conforming transportation plan and TIP. A particular action of the type listed in table 2 of this section is not exempt if the MPO in consultation with other agencies (see §93.105(c)(1)(iii)), the EPA, and the FHWA (in the case of a highway project) or the FTA (in the case of a transit project) concur that it has potentially adverse emissions impacts for any reason. States and MPOs must ensure that exempt projects do not interfere with TCM implementation.”

Based on Table 2—Exempt Projects, the Proposed Action is exempt from the conformity regulations because it is listed in the Table as “Transportation enhancement activities.” The Proposed Action does not involve increasing capacity through the creation of additional vehicle travel lanes. Therefore, no further air quality analysis is required.

Construction activities would temporarily generate low levels of emissions from construction vehicles using gasoline or diesel fuels. However, given the planned level of construction, the anticipated increase in emissions would be negligible.

Construction vehicles would stir up fugitive dust and add to the particulate matter in the project area, but compliance with best management practices (BMPs) would minimize fugitive dust during construction, as identified below.

Mitigation Measures for the Grays Well Road and Gecko Road Networks

Although there will be temporary impacts to air quality during construction, BMPs will be implemented to minimize fugitive dust during construction (see Appendix A, Standard Environmental Commitments Table). No long-term impacts to air quality are anticipated as a result of the proposed project.

Geology and Soils

Affected Environment for the Grays Well Road and Gecko Road Networks

In February 2015, geotechnical field investigations were conducted for the Grays Well Road and Gecko Road networks. Field exploration programs consisted of mobilization to the sites to review pavement surface conditions and to drill 10 exploratory drill holes to a depth of about 5.5 feet below the surface of the pavement. The pavement consisted of asphalt concrete over asphalt-treated base, cement-treated base, aggregate base, or additional asphalt pavement. The subgrade soil encountered generally consisted of dune sand with varying amounts of silt from local sand dunes. The sand is considered to be well drained and should provide excellent subgrade to support the proposed pavement.

Environmental Effects of the No-Action Alternative for the Grays Well Road and Gecko Road Networks

There would no construction activities under the No-Action Alternative; therefore, the geology and soils in the project area would not be impacted by the proposed project.

Environmental Effects of the Proposed Action for the Grays Well Road Network

The project involves pulverizing existing pavement to a specified depth. Then, a mixture of the existing asphalt, various base materials, and subgrade soil would be compacted as a base course material to provide support for the new asphalt pavement.

Construction materials will be obtained from commercial sources, since no government-provided sources are available.

Mitigation Measures for the Grays Well Road Network

The project will not adversely impact the geology or soils in the project area; therefore, no mitigation measures are necessary.

Environmental Effects of the Proposed Action for the Gecko Road Network

The project involves pulverizing roadway surfaces to a depth of 12 inches, then placing 3 inches of new asphalt concrete pavement on top of compacted, pulverized material. This assumes 1 percent of roadway will require sub-excavation.

Construction materials would be obtained from commercial sources, as no government-provided sources are available.

Mitigation Measures for the Gecko Road Network

The project will not adversely impact the geology or soils in the project area; therefore, no mitigation measures are necessary.

Hazardous Substances

Affected Environment for the Grays Well Road and Gecko Road Networks

Hazardous materials within the ISDRA consist of materials within municipal and informal dumping sites and mining-related hazardous materials. In the Imperial Sand Dunes Proposed RAMP/CDCA Plan Amendment and Final EIS, Sept 2012, it is noted that environmental databases were searched in accordance with ASTM International practices, which included all reasonably ascertainable environmental records, as well as state and federal sources. According to the EIS, no sites of environmental significance were identified.

Environmental Effects of the No-Action Alternative for the Grays Well Road and Gecko Road Networks

No construction would occur under the No-Action Alternative; therefore, there would be no impacts from hazardous materials or substances.

Environmental Effects of the Proposed Action for the Grays Well Road and Gecko Road Networks

During construction, there would be a potential for the release of petroleum products, diesel, oil, or oil products from vehicles, which would be mitigated as described below.

Mitigation Measures for the Grays Well Road and Gecko Road Networks

No disposal of hazardous or non-hazardous waste is allowed on public lands; therefore, before starting construction, the contractor will submit to FHWA-CFLHD and the BLM a Spill Prevention, Control, and Countermeasure (SPCC) plan that outlines procedures for dealing with incident spills and the legal disposal of spill material.

Noxious Weeds

Affected Environment for the Grays Well Road and Gecko Road Networks

Noxious weeds are plants designated by a federal, state or county government as detrimental or destructive to public health, agriculture, recreation, wildlife habitat, and/or important native species. The ISDRA, like many other public lands, has a list of noxious weeds that occur in the area. The BLM works to prevent new weed infestations and the spread of existing weeds that can occur through surface disturbance activities such as construction.

Environmental Effects of the No-Action Alternative for the Grays Well Road and Gecko Road Networks

No construction would occur under the No-Action Alternative; therefore, there would be no impacts from construction vehicles introducing or spreading noxious weeds or non-native plant species.

Environmental Effects of the Proposed Action for the Grays Well Road and Gecko Road Networks

During construction, there would be a potential for movement of seeds and plant parts via motor vehicles, or for ground-disturbing activities to result in areas being colonized by noxious weed species, thereby preventing the establishment of native vegetation. Mitigation measures to address the spread of noxious weeds during construction are described below.

Mitigation Measures for the Grays Well Road and Gecko Road Networks

All equipment and vehicles will be cleaned and inspected to ensure they are free of sediment and debris that may introduce the spread of noxious weeds and/or non-native or invasive species.

Recreation

Affected Environment for the Grays Well Road and Gecko Road Networks

The ISDRA is a world-class recreation destination that has been designated as an SRMA for OHVs. Other recreational activities include hiking, camping, wildlife and scenery viewing, picnicking, photography, and nature study and environmental education. The ISDRA is considered the premier sand dune OHV recreation area in the United States and is the most-visited OHV recreation area in the U.S. with more than 1.1 million OHV-related visitor days per year. The greatest number of visits is between October and April each year, specifically during weekends and holidays.

Camping is allowed in the ISDRA, except for the area between Wash 33 and 70, in the Gordon's Well area, and in designated Pierson's milk-vetch critical habitat, with amenities such as pit toilets and trash dumpsters. Additional amenities include several "vendor rows," the busiest one located along the south side of CA Hwy 78 between the Glamis Flats off-ramp and the Glamis private property line. Vendors are permitted through the BLM under the special recreation permit program.

Environmental Effects of the No-Action Alternative for the Grays Well Road and Gecko Road Networks

Under the No-Action Alternative, the pavement on the Grays Well Road and Gecko Road networks would continue to experience significant block cracking and thermal transverse cracking that will worsen over time, making access within the ISDRA difficult for visitors. Irregular lane widths and shoulders, fading pavement striping, and inadequate signage could present safety issues for recreationists.

Environmental Effects of the Proposed Action for the Grays Well Road and Gecko Road Networks

The Proposed Action would improve access throughout the Grays Well Road and Gecko Road networks and provide recreationists with uniform road widths and shoulders. The roads would have visible road markings and signs that meet current standards. Because construction of the improvements will take place between May and September (during the off season), little to no impacts are expected to occur.

Midway Campground near Grays Well Road will serve as the construction staging area, but since construction will take place during the off season, few to no campers will be using the campground. Access to the Historic Plank Road Interpretive Site would be limited.

Mitigation Measures for the Grays Well Road and Gecko Road Networks

Construction and the closure of Grays Well Road, including Midway Campground, and the closure of the Gecko Road network would be scheduled during the off season between May and September.

Invasive Plant Species

Affected Environment for the Grays Well Road and Gecko Road Networks

Two invasive plant species, Sahara mustard (*Brassica tournefortii*) and Russian thistle (*Salsola tragus*) were detected in the project area. Similar to noxious weeds, invasive plants are non-native plants that could be detrimental to wildlife habitat, threatened and endangered species, and native plants. The BLM also works to prevent new invasive infestations and the spread of existing invasive plants that can occur as a result of surface-disturbance activities, such as construction.

Environmental Effects of the No-Action Alternative for the Grays Well Road and Gecko Road Networks

No construction would occur under the No-Action Alternative; therefore, there would be no impacts from construction vehicles introducing or spreading invasive, non-native plant species.

Environmental Effects of the Proposed Action for the Grays Well Road and Gecko Road Networks

During construction, there would be a potential for movement of seed and plant parts on motor vehicles, or for ground-disturbing activities to result in areas being colonized by invasive plant species, thereby preventing the establishment of native vegetation. Mitigation measures to address the spread of invasive plant species during construction are described below.

Mitigation Measures for the Grays Well Road and Gecko Road Networks

All equipment and vehicles will be cleaned and inspected to ensure they are free of sediment and debris that may introduce or spread invasive plant species, non-native plants, and/or noxious weeds.

Affected Resources for Grays Well Road Only

Table 4. Affected Resources for Grays Well Road

Resource	Not Present	Present/Not Affected	Present/May Be Affected	Rationale for Determination
Areas of Critical Environmental Concern (ACEC)			X	The linear ACEC that follows the entire route of Plank Road, classified as historically significant and listed on the California Register of Historic Places, is present in the project area. The BLM will provide a monitor when construction work occurs near the section of the Plank Road to ensure that it will not be impacted.
Cultural Resources			X	Historical resources are present in the project area.
Threatened and Endangered Species and Special-Status Species			X	The U.S. Fish and Wildlife Service (USFWS) has identified federally listed species as occurring within the ISDRA; the state of California has identified endangered and rare species as occurring in the recreational area; and two BLM special-status species are known to occur in the area.
Utilities			X	The project is near a major utility corridor that includes overhead and underground electric, telephone, fiber optic (AT&T), sewer, and water utilities. The corridor is outside the limits of disturbance for this project, so no impacts are anticipated. A nearby traffic counter could potentially be impacted during construction.
Water Quality			X	There are two surface waterways in the project area that could be affected by construction activities.

Cultural Resources

Affected Environment for the Grays Well Road Network

In 2008, the BLM El Centro Field Office conducted a record search and literature review to identify and evaluate the significance of historic resources in the Area of Potential Effects (APE) that includes the Grays Well Road network. In accordance with 36 CFR 800, Protection of Historic Properties, the identification and evaluation efforts for the general area are described in four reports:

- *Class II Archaeological Survey of the Imperial Dunes*, prepared by Jackson Underwood and James Cleland (EDAW, San Diego, California, 2002).
- *An Assessment of the Imperial Sand Dunes as a Native American Landscape*, by John Russell, Clyde Woods, and Jackson Underwood (EDAW, San Diego, California, 2002).
- *Management Plan: Plank Road Area of Critical Environmental Concern*, by Pat Welch (BLM, El Centro Field Office, September 1985).
- *Archaeological Survey Report for the Proposed Sand Hills Interchange Project*, prepared by Debra Dominici (California Department of Transportation, District 11, July 1981).

During the 1981 survey and reconnaissance field exam by the BLM archaeologist in 2008, one archaeological site—the Plank Road—was located within the APE. This resource (CA-IMP-4764H) has been recommended as eligible for the National Register of Historic Places.

Environmental Effects of the No-Action Alternative for the Grays Well Road Network

Under the No-Action Alternative, there would be no construction or ground disturbance. Therefore, there would be no impacts to historic properties.

Environmental Effects of the Proposed Action for the Grays Well Road Network

Repaving and/or shoulder construction of the Grays Well Road network will occur in the vicinity of the relocated segments of the Plank Road and has the potential to affect this historic property if measures that are identified below are not taken to keep construction activities away from Plank Road segments.

Mitigation Measures for the Grays Well Road Network

Before construction activities occur in the vicinity of relocated portions of the Plank Road, the contractor will flag off the site to ensure construction activity does not affect the historic resource. A qualified BLM archaeologist must be present during construction in those areas to ensure that ground-disturbing activity does not affect the historic property. The contractor shall provide the BLM a minimum of 2 weeks (14 calendar days) notice prior to the start of construction activities.

Threatened and Endangered Species and Special-Status Species

There are two subcategories within this resource classification: vegetation and wildlife. The following sections are divided into these subcategories for discussion.

Vegetation: Affected Environment for the Grays Well Road Network

Five special-status species could potentially occur in or near the Grays Well Road project area.

1. Peirson's Milk-Vetch (*Astragalus magdalenae* var. *peirsonii*) is listed as threatened under the Endangered Species Act of 1973
2. Algodones Dunes Sunflower (*Helianthus niveus* ssp. *tephrodes*) is listed as California State Endangered and a BLM sensitive species
3. Wiggin's Croton (*Croton wigginsii*) is listed as California State Rare and is a BLM sensitive species
4. Giant Spanish Needle (*Palafoxia arida* var. *arida*) is a BLM sensitive species
5. Sandfood (*Pholisma sonora*) is a BLM sensitive species

A biological survey was conducted by the BLM and only Wiggin's Croton was detected along the existing Grays Well Road. Algodones Dunes Sunflower, Giant Spanish Needle, and Sandfood occur occasionally along the road. Most of the area along the road is highly impacted by OHV use. There are a few places along the road where fill material was placed to elevate the existing road. The adding of fill material has created areas where it is too steep for recreational activities to occur. The fill material areas combined with runoff water from the road has created zones where the density of Wiggin's Croton is high

and there are approximately 1,000 plants along the road. Most of the plants are concentrated near Midway Campground. This concentration of Wiggin's Croton slows and stops sand during wind events, which allows sand to accumulate on the road surface. It is regularly impacted during routine road maintenance.

Peirson's Milk-Vetch was not detected in the Grays Well Road APE and will not be impacted. The project is outside of both designated critical habitat and typical habitat capable of supporting the species.

Vegetation: Environmental Effects of the No-Action Alternative for the Grays Well Road Network

Since there would be no construction activities under the No-Action Alternative, there would be no impacts to special-status species.

Vegetation: Environmental Effects of the Proposed Action for the Grays Well Road Network

The proposed road improvements may result in impacts to four BLM sensitive species. Wiggin's Croton will have approximately 1,000 individual plants impacted, but this loss of individual plants will have an undetectable impact on the plant population as a whole due to the low number of plants impacted relative to the population numbers found throughout the entire ISDRA. Algodones Dunes Sunflower, Giant Spanish Needle, and Sandfood do occur occasionally along the existing road. It is estimated that no more than a few plants of each species will be impacted by construction activities.

Vegetation: Mitigation Measures for the Grays Well Road Network

A pre-construction survey will be conducted by the BLM.

Wildlife: Affected Environment for the Grays Well Road Network

Two BLM sensitive lizard species occur in the project area: FTHL (*Phrynosoma mcalli*) and Colorado Desert Fringe-Toed Lizard (*Uma notate*). The project area is in an already highly disturbed area, and lizards living near the existing road are at risk of being impacted from recreational and road maintenance activities. However, this will have undetectable impacts on BLM sensitive animal populations.

The BLM is a signatory to a 1997 Conservation Agreement to conserve the FTHL. The Agreement's objective is to implement the FTHL Range-Wide Management Strategy (RMS). This project area is within the species range, but outside of the FTHL Management Areas.

Desert Tortoise does not occur in the project area. There will be no effect to Desert Tortoise.

Wildlife: Environmental Effects of the No-Action Alternative for the Grays Well Road Network

Since there would be no construction activities under the No-Action Alternative, there would be no construction-related impacts to sensitive lizard species.

Wildlife: Environmental Effects of the Proposed Action for the Grays Well Road Network

There may be direct impacts to individual lizards during construction. Both species rely on burying themselves in sand or suitable habitat, making them difficult to detect. While hiding, they become more vulnerable to construction-related injuries. The mitigation measures proposed below will reduce, but not eliminate, impacts to individuals of the various species of wildlife potentially affected by the project.

Wildlife: Mitigation Measures for the Grays Well Road Network

Prior to project initiation, an individual will be designated as a field contact representative. The field contact representative will have the authority to ensure compliance with protective measures for the FTHL and will be the primary agency contact dealing with these measures. The field contact representative will have the authority and responsibility to halt activities that are in violation of these terms and conditions.

All project work areas will be clearly flagged or similarly marked at the outer boundaries to define the limit of work activities. All construction and restoration workers will restrict their activities and vehicles to areas that have been flagged to eliminate adverse impacts to the FTHL and its habitat. All workers will be instructed that their activities are restricted to flagged and cleared areas.

A BLM monitor will be present, as determined by the BLM authorized officer, throughout the work day from initial clearing through habitat restoration, except where the project is completely fenced and cleared of FTHLs by a BLM biologist.

The Contractor will develop and implement a worker education program that will be given to all individuals as a routine on-boarding exercise before beginning construction work. Handouts summarizing this information will be provided to all construction and maintenance personnel. The education program will include the following aspects, at a minimum:

- Biology and status of the FTHL
- Protection measures designed to reduce potential impacts to the species
- Function of flagging designating authorized work areas
- Reporting procedures to be used if a FTHL is encountered in the field
- Importance of exercising care when commuting to and from the project area to reduce mortality of FTHL's on roads

Work with the project supervisor to take steps, as necessary, to avoid disturbance to FTHLs and their habitat. If avoiding disturbance to an FTHL is not possible or if an FTHL is found trapped in an excavation, the affected lizard will be captured by hand and relocated.

No dogs are allowed on the project site.

All trash and food items will be promptly contained within closed, raven-proof containers. These will be regularly removed from the project site to reduce the attractiveness of the area to ravens and other FTHL predators.

Utilities

Affected Environment for the Grays Well Road Network

Existing utilities in the project area appear to be limited to a major utility corridor that includes overhead and underground electric, telephone, fiber optic (AT&T), sewer, and water utilities.

A BLM traffic counter exists on the north side of Grays Well Road near the intersection with the I-8 off-ramp.

Environmental Effects of the No-Action Alternative for the Grays Well Road Network

There would not be any construction in the No-Action Alternative; therefore, there would be no impacts to or relocations of utilities.

Environmental Effects of the Proposed Action for the Grays Well Road Network

It is anticipated that no utility relocations will be required during construction. However, underground utilities will be located and verified before construction to avoid disturbance.

Underground components of the traffic counter might be damaged during construction unless mitigation measures are in place.

Mitigation Measures for the Grays Well Road Network

The BLM will provide utility owner contact lists to the FHWA-CFLHD. These contacts will be added to the construction documents and the contractor will be responsible for contacting the utility owners prior to construction.

Underground components of the traffic counter will be located and removed and replaced during construction.

Water Quality

Affected Environment for the Grays Well Road Network

There are no major lakes, reservoirs, or rivers in the project area. The primary groundwater basin in the project area is the Imperial Valley Basin. Two surface waterways are the All-American Canal and the New Coachella Canal.

The All-American Canal is part of the 80-mile, concrete-lined, All-American Canal System, located in the southeastern corner of California. Water from the Colorado River runs through the canal on its way to nine cities and more than 500,000 acres of agricultural lands throughout the Imperial Valley (BLM, 2013c).

In the early 1980s, the Old Coachella Canal was replaced with a new 49-mile, concrete-lined canal called the New Coachella Canal. The new canal is connected to the All-American Canal and runs northwest along the approximate western boundary of the ISDRA.

Environmental Effects of the No-Action Alternative for the Grays Well Road Network

Under the No-Action Alternative, none of the elements of the proposed project would be implemented; therefore, no water quality would be impacted.

Environmental Effects of the Proposed Action for the Grays Well Road Network

The Proposed Action would potentially use water from the All-American Canal or the New Coachella Canal for dust control during construction. The project is not expected to affect groundwater because subsurface excavation will not reach groundwater depths.

Mitigation Measures for the Grays Well Road Network

A National Pollutant Discharge Elimination System (NPDES) permit will be required from the Water Quality Regional Board of San Diego, the governing agency.

A Storm Water Pollution Prevention Plan (SWPPP) for the site will be developed by the FHWA engineering consultant and approved by the BLM and FHWA. The purpose of the SWPPP is to prevent offsite migration of contaminated stormwater or increased soil erosion.

The contractor will coordinate with the Imperial Irrigation District to potentially obtain permits to use water for construction from the nearby Coachella Canal (two permits required) or the All-American Canal (one permit required). The contractor also has the option of bringing water to the site from a location outside of the ISDRA.

Cumulative Effects for the Grays Well Road Network

Cumulative impacts are defined in Section 1508.7 of the Council on Environmental Quality (CEQ) regulations, 40 CFR Sections 1500-1508. According to these federal regulations, cumulative impacts result from the incremental impact of an action when added to other past, present, and reasonably foreseeable future actions.

To facilitate recreation use while protecting the natural and cultural resources of the ISDRA, 4.49 miles of the Grays Well Road network was constructed as one of 191.37 total miles of “routes of travel” throughout the recreation area. As a new road, it was constructed only after appropriate environmental analyses, BLM specifications, and BMPs were employed to minimize impact to resources and reduce erosion. Since the Proposed Action is a rehabilitation, restoration, and resurfacing project on the existing road, the cumulative impacts from past actions are expected to be minimal as described below.

There would be no cumulative effects on Coastal Areas, Prime or Unique Farmland, Floodplains, Section 6(f) Resources, Social and Economic Resources, Wetlands and Other Waters of the U.S., or Wild and Scenic Rivers because these resources are not present in the project area.

An analysis of other resources that are present in the project area but not expected to have adverse effects from the Proposed Action include: Land Use, Noise, Noxious Weeds, Right of Way, Section 4(f) Resources, and Visual Quality. Because there are no adverse effects to these resources anticipated from the Proposed Action, there would not be any cumulative effects on these resources.

For Vegetation resources, the possibility exists of impacting a few BLM special-status plants that may grow along Grays Well Road during construction. These impacts would add to the effects these plants endure through routine road maintenance and recreation activities. Because only a few plants are expected to be impacted, there would be an undetectable cumulative impact to BLM special vegetation species.

Maintenance activities could result in impacts to all four of the BLM sensitive vegetation species. Maintenance and recreational activities are ongoing in the project area and loss of individual plants will have undetectable impacts on BLM special status plant populations due to the low number of plants impacted relative to the population numbers found throughout the ISDRA.

For the two BLM sensitive lizard species in the area—the FTHL and the Colorado Desert Fringe-Toed Lizard—the small scale and short duration of the project will not have a measurable impact in combination with the normal recreation and maintenance activities. Impacts to individual lizards will not affect the local population levels for either species. The mitigation measures proposed will reduce, but not eliminate, impacts to individuals of the various species of wildlife potentially affected by the project.

Cumulative effects on Air Quality, Hazardous Materials, Recreation, Utilities, and Water Quality would occur during construction and would be insignificant and of short duration. To address these impacts, effective mitigation strategies contained within the Standard Specifications (FP-14) or Special Contract Requirements (SCR) will be implemented. When the improvements are completed for the Grays Well Road network, the effects to these resources would end.

Foreseeable future transportation plans discussed in the El Centro Field Office ISDRA ROD and RAMP (BLM, 2013c) are not expected to degrade the environment. Emphasis is placed on managing designated routes of travel to minimize impacts to sensitive resources, reduce conflicts between users, and provide for visitor safety.

Affected Resources for Gecko Road Only

Table 5. Affected Resources for Gecko Road

Resource	Not Present	Present/Not Affected	Present/May Be Affected	Rationale for Determination
Cultural Resources			X	Historical and archaeological resources may occur in the project area.
Threatened and Endangered Species and Special-Status Species			X	The USFWS has identified federally listed species as occurring within the ISDRA; the state of California has identified endangered and rare species as occurring in the recreational area; and two BLM special-status species are known to occur in the area.
Utilities			X	Overhead and underground electric, telephone, fiber optic (AT&T), sewer, and water occur in the project area.
Water Quality			X	There is one surface waterway in the project area that could be affected by construction activities.

Cultural Resources

Affected Environment for the Gecko Road Network

A records search request was sent to the South Coastal Information Center (SCIC) on February 6, 2015, and was received on February 11, 2015. There were 12 previous studies, with two cultural resources recorded within a one-half mile buffer. Five of these studies pertained to development of geothermal plants along East and/or West Mesa, and seven pertained to the ISDRA. One of the seven ISDRA studies directly involved Gecko Road (Hangan, 1999). No previously recorded cultural resources were located within the project APE.

The APE consisted of the entirety of the Gecko Road network, including Roadrunner Campground and Gecko Campground. Gecko Road starts at CA Hwy 78 and heads south-southeast until its termination at Roadrunner Campground. A 100-foot survey corridor on both sides of the road to account for construction equipment staging and laydown areas was prescribed by the BLM for this project, with a survey transect spacing of 15 meters. Atkins conducted an intensive-level cultural resources survey of the APE on February 26, 2015. Results of the survey are found in the report titled, *Class II Cultural Resources Survey for the Gecko Road Improvements Project Report*. No resources were located during the Atkins survey.

Environmental Effects of the No-Action Alternative for the Gecko Road Network

There would no construction activities under the No-Action Alternative. Therefore, no historic properties would be affected by the No-Action Alternative.

Environmental Effects of the Proposed Action for the Gecko Road Network

As no cultural resources were observed during the pedestrian survey and no previously recorded sites were located within the APE, no historic properties will be affected.

Mitigation Measures for the Gecko Road Network

The project will have no effect on cultural resources in the APE; therefore, no mitigation measures are necessary.

Threatened and Endangered Species and Special-Status Species

There are two subcategories within this resource classification: vegetation and wildlife. The following sections are divided into these subcategories for discussion.

Vegetation: Affected Environment for the Gecko Road Network

Five special-status species could potentially occur in or near the project area:

1. Peirson's Milk-Vetch (*Astragalus magdalenae* var. *peirsonii*) is listed as threatened under the Endangered Species Act of 1973
2. Algodones Dunes Sunflower (*Helianthus niveus* ssp. *tephrodes*) is listed as a California State Endangered species and a BLM sensitive species
3. Wiggin's Croton (*Croton wigginsii*) is listed as a state rare species and is a BLM sensitive species
4. Giant Spanish Needle (*Palafoxia arida* var. *arida*) is a BLM sensitive species
5. Sandfood (*Pholisma sonora*) is a BLM sensitive species

A biological survey was conducted by the BLM. No Peirson's Milk-Vetch plants were detected in the APE, so this species will not be impacted. The project is outside of both designated critical habitat and typical habitat capable of supporting the species.

Only Wiggin's Croton was detected along the existing Gecko Road. Algodones Dunes Sunflower, Sandfood, and Giant Spanish Needle occur occasionally (over time) along the existing road. The area along the road is highly impacted by recreational and routine road maintenance activities. Plants that germinate along the road have little chance of survival. Plants along the shoulder of the road that do survive slow and stop sand during wind events, which allows sand to accumulate on the road surface. Accumulation of sand on the road can impede traffic.

Necessary maintenance of the road involves removing sand from the road and shoulder and replacing it in active sand dunes.

Vegetation: Environmental Effects of the No-Action Alternative for the Gecko Road Network

There would no construction activities under the No-Action Alternative. Therefore, there would be no adverse effect to vegetation from the No-Action Alternative.

Vegetation: Environmental Effects of the Proposed Action for the Gecko Road Network

The proposed road improvements to the Gecko Road network may result in impacts to four BLM sensitive species—Wiggin's Croton, Algodones Dunes Sunflower, Sandfood, and Giant Spanish Needle—that occur occasionally (in time) along the road. Wiggin's Croton will have approximately 1,000 individual plants impacted, but this loss of individual plants will have an undetectable impact on the plant population as a whole due to the low number of plants impacted relative to the population numbers found throughout the ISDRA. It is estimated that no more than a few plants of Algodones Dunes Sunflower, Sandfood, and Giant Spanish Needle will be impacted by improvements to the road.

Peirson's Milk-Vetch was not detected in the project site and will not be impacted.

Vegetation: Mitigation Measures for the Gecko Road Network

A pre-construction survey will be conducted by the BLM.

Wildlife: Affected Environment for the Gecko Road Network

Two BLM sensitive lizard species occur in the project area: FTHL (*Phrynosoma mcalli*) and Colorado Desert Fringe-Toed Lizard (*Uma notata*). The project area is in an already highly disturbed area and lizards living near the existing road are at risk of being impacted from recreational and road maintenance activities.

The BLM is a signatory to a 1997 Conservation Agreement to conserve the FTHL. The Agreement's objective is to implement the FTHL RMS. This project is within the species range, but outside of FTHL Management Areas.

Desert Tortoise does not occur in the project area. There will be no effect to Desert Tortoise.

Wildlife: Environmental Effects of the No-Action Alternative for the Gecko Road Network

There would no construction activities under the No-Action Alternative. Therefore, there would be no construction-related adverse effect to sensitive lizard species from the No-Action Alternative.

Wildlife: Environmental Effects of the Proposed Action for the Gecko Road Network

There may be direct impacts to individual lizards during construction. Both species rely on burying themselves in sand or suitable habitat, making them difficult to detect. While hiding, they become more vulnerable to construction-related injuries.

Maintenance and recreational activities are ongoing in the project area and loss of individual lizards will have undetectable impacts on BLM special-status animal populations.

Wildlife: Mitigation Measures for the Gecko Road Network

Prior to project initiation, an individual will be designated as a field contact representative. The field contact representative will have the authority to ensure compliance with protective measures for the FTHL and will be the primary agency contact dealing with these measures. The field contact representative will have the authority and responsibility to halt activities that are in violation of these terms and conditions.

All project work areas will be clearly flagged or similarly marked at the outer boundaries to define the limit of work activities. All construction and restoration workers will restrict their activities and vehicles to areas that have been flagged to eliminate adverse impacts to the FTHL and its habitat. All workers will be instructed that their activities are restricted to flagged and cleared areas.

A BLM monitor will be present, as determined by the BLM authorized officer, throughout the work day from initial clearing through habitat restoration, except where the project is completely fenced and cleared of FTHLs by a BLM biologist.

The Contractor will develop and implement a worker education program that will be given to all individuals as a routine on-boarding exercise before beginning construction work. Handouts summarizing this information will be provided to all construction and maintenance personnel. The education program will include the following aspects, at a minimum:

- Biology and status of the FTHL
- Protection measures designed to reduce potential impacts to the species
- Function of flagging/designating authorized work areas

- Reporting procedures to be used if an FTHL is encountered in the field
- Importance of exercising care when commuting to and from the project area to reduce mortality of FTHLs on roads

Work with the project supervisor to take steps, as necessary, to avoid disturbance to FTHLs and their habitat. If avoiding disturbance to a FTHL is not possible or if a FTHL is found trapped in an excavation, the affected lizard will be captured by hand and relocated.

No dogs are allowed on the project site.

All trash and food items will be promptly contained within closed, raven-proof containers. These will be regularly removed from the project site to reduce the attractiveness of the area to ravens and other FTHL predators.

Utilities

Affected Environment for the Gecko Road Network

Existing utilities in the project area appear to be limited to the first 0.3 mile of roadway and mainly service the BLM Cahuilla Ranger Station. Identified utilities include overhead and underground electric, telephone, fiber optic (AT&T), sewer, and water.

A BLM traffic counter exists on Gecko Road near the intersection with CA Hwy 78. Above-ground facilities for the counter are on the west side of the road.

Environmental Effects of the No-Action Alternative for the Gecko Road Network

There would not be any construction in the No-Action Alternative; therefore, there would be no impacts to or relocation of utilities.

Environmental Effects of the Proposed Action for the Gecko Road Network

It is anticipated that no utility relocations would be required during construction; however, underground utilities would be located and verified before construction to avoid disturbance.

The traffic counter on the west side of Gecko Road could be damaged during construction. Mitigation, described below, would ensure that no damage would occur.

Mitigation Measures for the Gecko Road Network

The BLM will provide utility owner contact lists to the FHWA-CFLHD. These contacts will be added to the construction documents and the contractor will be responsible for contacting the utility owners prior to construction.

Underground portions of the traffic counter on the west side of Gecko Road near the intersection with CA Hwy 78 will be located and removed and replaced during construction.

Water Quality

Affected Environment for the Gecko Road Network

There are no major lakes, reservoirs, or rivers in the project area. The primary groundwater basin in the project area is the Imperial Valley Basin. One surface waterway is the New Coachella Canal.

In the early 1980s, the Old Coachella Canal was replaced with a new 49-mile, concrete-lined canal called the New Coachella Canal. The new canal is connected to the All-American Canal and runs northwest along the approximate western boundary of the ISDRA.

Environmental Effects of the No-Action Alternative for the Gecko Road Network

Under the No-Action Alternative, none of the elements of the proposed project would be implemented; therefore, no water quality would be impacted.

Environmental Effects of the Proposed Action for the Gecko Road Network

For the Proposed Action, the contractor would potentially use water from the New Coachella Canal during construction for dust control. The Gecko Road project is not expected to affect groundwater because subsurface excavation would not reach groundwater depths.

Mitigation Measures for the Gecko Road Network

A National Pollutant Discharge Elimination System (NPDES) permit will be required from the Water Quality Regional Board of San Diego, the area governing agency.

A SWPPP for the site will be developed by the FHWA engineering consultant and approved by the BLM and FHWA. The purpose of the SWPPP is to prevent offsite migration of contaminated stormwater or increased soil erosion.

The contractor will coordinate with the Imperial Irrigation District to potentially obtain permits to use water for construction from the nearby Coachella Canal (two permits required). The contractor also has the option of bringing water to the site from a location outside of the ISDRA.

Cumulative Effects for the Gecko Road Network

Cumulative impacts are defined in Section 1508.7 of the Council on Environmental Quality (CEQ) regulations, 40 CFR Sections 1500-1508. According to these federal regulations, cumulative impacts result from the incremental impact of an action when added to other past, present, and reasonably foreseeable future actions.

To facilitate recreation use while protecting the natural and cultural resources of the ISDRA, 6.39 miles of the Gecko Road network was constructed as one of 191.37 total miles of “routes of travel” throughout the recreation area. As a new road, it was constructed only after appropriate environmental analyses, BLM specifications, and BMPs were employed to minimize impact to resources and reduce erosion. Since the Proposed Action is a rehabilitation, restoration, and resurfacing project on the existing road, the cumulative impacts from past actions are expected to be minimal, as described below.

There would be no cumulative effects on Coastal Areas, Prime or Unique Farmland, Floodplains, Section 6(f) Resources, Social and Economic Resources, Wetlands and Other Waters of the U.S., or Wild and Scenic Rivers because these resources are not present in the project area.

An analysis of other resources that are present in the project area but not expected to have adverse effects from the Proposed Action include: Cultural Resources, Land Use, Noise, Noxious Weeds, Right of Way, Section 4(f) Resources, Visual Quality, and Wilderness Areas. Because there are no adverse effects to these resources anticipated from the Proposed Action, there would not be any cumulative effects on these resources.

For Vegetation resources, there is a possibility during construction of impacting a few BLM special-status plant species that may line Gecko Road. These impacts would add to the effects these plants endure

through routine road maintenance and recreation activities that are ongoing in the project area. Because only a few plants are expected to be impacted, there would be an undetectable cumulative impact to BLM special vegetation species.

For the two BLM sensitive lizard species in the area—the FTHL and the Colorado Desert Fringe-Toed Lizard—the small scale and short duration of the project and the use of mitigation measures will not have a measurable impact. Impacts to individual lizards will have no effect to the local population levels for either species.

Cumulative effects on Air Quality, Hazardous Materials, Recreation, Utilities, and Water Quality would occur during construction and would be insignificant and of short duration. To address these impacts, effective mitigation strategies contained within the Standard Specifications (FP-14) or Special Contract Requirements (SCR) will be implemented. When the improvements are completed for the Gecko Road network, the effects to these resources would end.

Foreseeable future transportation plans discussed in the El Centro Field Office, ISDRA ROD and RAMP (BLM, 2013c) are not expected to degrade the environment. Emphasis is placed on managing designated routes of travel to minimize impacts to sensitive resources, reduce conflicts between users, and provide for visitor safety.

4. Consultation and Coordination

Consultation

Extensive consultation and coordination with Indian Tribes, Organizations, and Agencies was conducted during preparation of the Draft and Final Environmental Impact Statement for the RAMP and Proposed Amendment to the CDCA Plan. This included public planning meetings, scoping meetings, and public comment meetings. Government-to-government consultation was carried out with Indian Tribes, and consultations were completed with the USFWS and the California Office of Historic Preservation.

The BLM recently consulted on the proposed project with the Desert Advisory Committee ISDRA Subgroup as well as the Imperial County Planning Department, Caltrans, Imperial Irrigation District, and USFWS.

Public Participation

This EA will be posted on the BLM El Centro Field Office website for 30 days to allow for public comment.

List of Preparers

This EA was prepared by a group of professional staff from the BLM California Desert District and the El Centro Field Office, the FHWA-CFLHD, and consultant staff with Atkins North America, Inc. The table below provides the names, their titles, and the topic of their discipline/expertise.

Table 6. List of Preparers

Name	Title	Discipline/Expertise
BLM		
Sai Syhaphom	BLM Project Manager	Civil Engineer/Roadway Design
Andrew Trouette	Botanist	Biologist for T&E and Special-Status Species
Carrie Simmons	Resources Branch Supervisor	Resources, Archaeology, NEPA
Veronica Vogan	Realty Specialist	Lands and Realty
Neil Hamada	Recreation Branch Supervisor	Recreation, ISDRA
Thomas Zale	Field Manager	Resources, Recreation, etc.
John Johnson	Environmental Protection Specialist	Wilderness
FHWA-CFLHD		
Kelly Wade	Environmental Team Leader	Environmental
Kelly Larson, P.E.	FHWA-CFLHD Project Manager	Civil Engineer/Roadway Design
Atkins		
Andrea Garcia	Senior Planner III	Senior NEPA Planner
Michael Gloden	Senior Scientist II	Senior Scientist
Sandra Pentney	Senior Scientist I	Cultural Resources
Karen Wilharm	Planner I	Environmental Planner
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5. Acronyms and References

Acronyms

AASHTO	American Association of State Highway and Transportation Officials
ACEC	Area of Critical Environmental Concern
ADA	Americans with Disabilities Act
APE	Area of Potential Effects
BLM	Bureau of Land Management
BMP	Best management practice
CA Hwy 78	California Highway 78
CDCA	California Desert Conservation Area
CEQ	Council on Environmental Equality
CO	Carbon monoxide
CTS	Cement-treated sand
EA	Environmental Assessment
EIS	Environmental Impact Statement
EPA	Environmental Protection Agency
ESA	Endangered Species Act
FDR	Full-depth reclamation
FHWA-CFLHD	Federal Highway Administration, Central Federal Lands Highway Division
FLPMA	Federal Land Policy Management Act of 1976
FONSI	Finding of No Significant Impact
FTHL	Flat-Tailed Horned Lizard
HACP	Hot asphalt concrete pavement
I-8	Interstate 8
ISDRA	Imperial Sand Dunes Recreation Area
MAP-21	Moving Ahead for Progress in the 21 st Century Act
MP	Milepost
MUTCD	Manual on Uniform Traffic Control Devices
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act of 1969
NO ₂	Nitrogen dioxide
NPDES	National Pollutant Discharge Elimination System
O ₃	Ozone
OHV	Off-Highway Vehicle
Pb	Lead

PM	Particulate matter
PM ₁₀	Particulate matter less than 10 microns in size
PM _{2.5}	Particulate matter less than 2.5 microns in size
RAMP	Recreation Area Management Plan
RMS	Range-wide management strategy
ROD	Record of Decision
RV	Recreational vehicle
SCIC	South Coastal Information Center
SCR	Special Contract Requirement
SHPO	State Historic Preservation Office
SO ₂	Sulfur dioxide
SPCC Plan	Spill Prevention, Control, and Countermeasure Plan
SRMA	Special Recreation Management Area
SWPPP	Storm Water Pollution Prevention Plan
USFWS	United States Fish and Wildlife Service

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6. Appendixes

Appendix A: Standard Environmental Commitments Summary Table for the Grays Well Road and Gecko Road Networks

Appendix B: Other Environmental Commitments Summary Table for the Grays Well Road and Gecko Road Improvements

Appendix C: Mitigation Summary Table for the Grays Well Road and Gecko Road Networks

1 **Appendix A: Standard Environmental Commitments Summary Table for the Grays Well Road and**
2 **Gecko Road Networks**

No.	Standard Environmental Commitments contained within the Standard Specifications (FP-14) or Special Contract Requirements (SCR)	Resources	FP/SCR
1	<p>Provide an adequate water supply and apply water uniformly across the traveled way as necessary to control dust. Uniformly apply water using pressure-type distributors, pipelines equipped with spray systems, or hoses with nozzles.</p> <p>Control dust within the construction limits as necessary, including nights, weekends, and periods of non-work when the project is open to public traffic. When the project is not open to public traffic, control dust in areas of the project that have adjacent residences or businesses. Control dust on approved, active detours established for the project. Apply water at the locations, rates, and frequencies as ordered.</p> <p>Control dust on active haul roads, in pits and staging areas, and on the project during periods not covered above.</p>	Air Quality	FP 158.03
2	<p>Do not excavate, remove, damage, alter, or deface any archaeological or paleontological remains or specimens. Control the actions of employees and subcontractors on the project to ensure that protected sites are not disturbed or damaged. Should these items be encountered, suspend operations at the discovery site, notify the contracting officer and continue operations in other areas. The contracting officer will inform the contractor when operations may resume at the discovery site.</p>	Cultural Resources	FP 107.02
3	<p>Submit a Spill Prevention, Control, and Countermeasure (SPCC) Plan if required at least two days before beginning work.</p> <p>If an SPCC plan is not required, submit a hazardous spill plan at least two days before beginning work. Describe preventative measures, including the location of refueling and storage facilities and the handling of hazardous material. Describe actions to be taken in case of a spill.</p> <p>Do not use equipment with leaking fluids. Spill containment bins must be kept underneath all equipment during non-use. Repair equipment fluid leaks immediately. Keep absorbent material manufactured for containment and cleanup of hazardous material on the job site.</p> <p>Notify the Contracting Officer of hazardous spills.</p>	Hazardous Materials	FP 107.10(b)

No.	Standard Environmental Commitments contained within the Standard Specifications (FP-14) or Special Contract Requirements (SCR)	Resources	FP/SCR
4	Sand or soils are not approved absorbent materials. Report the spill to the appropriate federal, state, and local authorities as required by the SPCC plan or hazardous spill plan.	Hazardous Materials	SCR 107.10(b)
5	Remove dirt, plant, and foreign material from vehicles and equipment before mobilizing to the work site. Prevent introduction of noxious weeds and non-native plant species into the work site. Follow applicable federal land management agency requirements and state requirements. Maintain cleaning and inspection records.	Noxious Weeds	FP 107.10(c)
6	Conform to the Federal Seed Act, the Federal Noxious Weed Act, and applicable state and local seed and noxious weed laws.	Noxious Weeds, Vegetation	FP 713.04
7	Use only approved portions of the right of way for storing material or equipment. Provide additional space as needed. Do not use private property for storage without written permission of the owner or lessee. Submit copies of agreements and documents. Provide security for stored material. Restore government-provided storage sites to their original condition.	Right of Way	FP 105.04
8	Do not disturb the area beyond the construction limits. Replace trees, shrubs, or vegetated areas damaged by construction operations as directed.	Vegetation	FP 107.02
9	Do not damage vegetation designated to remain. If damage occurs, repair or replace the vegetation in an acceptable manner. Where possible, preserve vegetation adjacent to bodies of water. Treat cuts or scarred surfaces of trees and shrubs with tree wound dressing.	Vegetation	FP 201.03
10	Protect and care for seeded areas, including watering when needed. Repair or apply supplemental applications of seed, mulch, fertilizer, and water as many times as needed until turf is established or final acceptance.	Vegetation	FP 625.09

No.	Standard Environmental Commitments contained within the Standard Specifications (FP-14) or Special Contract Requirements (SCR)	Resources	FP/SCR
11	<p>Provide soil erosion and sediment control measures according to the contract erosion and sediment control plan, contract permits, Section 107, and this section. Contract permits amend the requirements of this section. Do not modify the type, size, or location of controls or practices without approval.</p> <p>The erosion and sediment control plan reflects special concerns and measures to protect resources. An alternate erosion and sediment control or stormwater pollution prevention plan, with necessary permits, may be submitted for approval according to Subsection 104.03. Submit alternate erosion and sediment control proposals at least 30 days before their intended use.</p> <p>When soil erosion and sediment control measures are not functioning as intended, take corrective action to eliminate or minimize pollutants in stormwater discharges from the project.</p> <p>If wood chips are used, do not import without approval from the Contracting Officer.</p>	Vegetation, Water Quality	FP 157.04
12	<p>Before grubbing or grading, construct sediment controls around the perimeter of the project, including filter barriers, diversion, and settling structures. Limit the combined grubbing and grading operations areas to 8 acres (3.2 hectares) of exposed soil at one time.</p> <p>Construct and implement soil erosion and sediment control measures as follows:</p> <ul style="list-style-type: none"> (a) Construct temporary controls in incremental stages as construction proceeds; (b) Construct temporary slope drains, diversion channels, and earth berms to protect disturbed areas and slopes; (c) When a soil-disturbing activity within a portion of the project is complete, apply permanent measures to the finished slopes and ditches within 14 days; (d) When a soil-disturbing activity within a portion of the project has temporarily ceased, apply temporary measures within 14 days; (e) Construct outlet protection as soon as culverts or other structures are complete; (f) Construct and maintain soil erosion and sediment controls on and around soil stockpiles; (g) Following each day's grading operations, shape earthwork to minimize and control erosion from stormwater runoff; and (h) Maintain stabilized construction exits to minimize tracking of soil onto existing roads. 	Vegetation, Water Quality	FP 157.05
13	<p>Construct silt fence, berms, and fiber rolls and socks to reduce the velocity of runoff to allow sediment to settle.</p>	Vegetation, Water Quality	FP 157.06

No.	Standard Environmental Commitments contained within the Standard Specifications (FP-14) or Special Contract Requirements (SCR)	Resources	FP/SCR
14	Apply turf establishment to finished slopes and ditches within 14 days after completion of construction on any portion of the site.	Vegetation, Water Quality	FP 625.03
15	Before developing a material source, measure the sediment content of bodies of water adjacent to the work area that will receive drainage from the work area. Perform erosion and sediment control according to the source development plan and the Storm Water Pollution Prevention Plan (SWPPP) or the Erosion Control Plan.	Water Quality	FP 105.03
16	For a project disturbing more than one acre of land and that does not qualify as routine maintenance (the majority of FHWA projects), Clean Water Act Section 402 (NPDES) requires the adoption of additional mitigation measures (including an SWPPP) to be included into FHWA projects. Permit coverage varies by state and land ownership (tribal lands). If applicable, comply with the terms and conditions of the appropriate NPDES Construction General Permit and/or state permit requirements.	Water Quality	SCR 107.01
17	Construct sediment retention structures of the following types: (a) Temporary sediment traps to detain runoff from disturbed areas and settle out sediment. Provide outlet protection. (b) Sediment basins to store runoff and settle out sediment for large drainage areas. Excavate and construct sediment basins according to Section 204. Construct riser pipes according to Section 602. Provide outlet protection.	Water Quality	FP 157.07
18	Removal of structures and obstructions: Construct structurally adequate debris shields to contain debris within the construction limits. Do not permit debris to enter waterways, travel lanes open to public traffic, or areas designated not to be disturbed.	Water Quality	FP 203.04(b)

1 **Appendix B: Other Environmental Commitments Summary Table for the Grays Well Road and**
2 **Gecko Road Improvements**

No.	Mitigation	Resources	FP/SCR
Both Grays Well Road and Gecko Road			
1	Implement BMPs to minimize fugitive dust during construction	Air Quality	SCR 107.10
2	No disposal of hazardous or non-hazardous waste is allowed on public lands; therefore, before starting construction, the contractor will submit to FHWA-CFLHD and the BLM a Spill Prevention, Control, and Countermeasure (SPCC) plan that outlines procedures for dealing with incident spills and the legal disposal of spill material	Hazardous Substances	SCR 107.10
3	All equipment and vehicles will be cleaned and inspected to ensure they are free of sediment and debris that may introduce or spread of noxious weeds, non-native and/or invasive species.	Noxious Weeds	SCR 107.10
4	Construction and the closure of Grays Well Road, including Midway Campground, and closure of Grays Well Road network would be scheduled during the off-season season between May and September.	Recreation	SCR 108.01
5	All equipment and vehicles will be cleaned and inspected to ensure they are free of sediment and debris that may introduce or spread of invasive plant species, non-native and/or noxious weeds.	Invasive Plants	SCR 107.10
6	The BLM will provide utility owner contact lists to the FHWA-CFLHD. These contacts will be added to the construction documents and the contractor will be responsible for contacting the utility owners prior to construction. Underground components of the traffic counter will be located and removed and replaced during construction.	Utilities	SCR Table 107-1
7	A National Pollutant Discharge Elimination System (NPDES) permit will be required from the Water Quality Regional Board of San Diego, the governing agency. A Storm Water Pollution Prevention Plan (SWPPP) for the site will be developed by the FHWA engineering consultant and approved by the BLM and FHWA. The purpose of the SWPPP is to prevent offsite migration of contaminated stormwater or increased soil erosion. The contractor will coordinate with the Imperial Irrigation District to potentially obtain permits to use water for construction from the nearby Coachella Canal (two permits required) or the All-American Canal (one permit required). The contractor also has the option of bringing water to the site from a location outside of the ISDRA.	Water Quality	SCR 107.01

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No.	Mitigation	Resources	FP/SCR
Grays Well Road only			
8	Before construction activities occur in the vicinity of relocated portions of the Plank Road, the contractor will flag off the site to ensure construction activity does not affect the historic resource. A qualified archaeologist must be present during construction to ensure that ground-disturbing activity does not affect the historic property. The contractor shall provide the BLM a minimum of 2 weeks (14 calendar days) notice prior to the start of construction activities.	Cultural Resources	SCR 107.10
9	A pre-construction survey will be conducted by the BLM.	Threatened and Endangered Species and Sensitive Species—Vegetation	SCR 107.10

No.	Mitigation	Resources	FP/SCR
10	<p>Prior to project initiation, an individual shall be designated as a field contact representative. The field contact representative will have the authority to ensure compliance with protective measures for the Flat-Tailed Horned Lizard (FTHL) and will be the primary agency contact dealing with these measures. The field contact representative will have the authority and responsibility to halt activities that are in violation of these terms and conditions.</p> <p>All project work areas will be clearly flagged or similarly marked at the outer boundaries to define the limit of work activities. All construction and restoration workers will restrict their activities and vehicles to areas that have been flagged to eliminate adverse impacts to the FTHL and its habitat. All workers will be instructed that their activities are restricted to flagged and cleared areas.</p> <p>A BLM monitor will be present as determined by the BLM authorized officer, throughout the work day from initial clearing through habitat restoration, except where the project is completely fenced and cleared of FTHLs by a BLM biologist.</p> <p>The Contractor will develop and implement a worker education program that will be given to all individuals as a routine on-boarding exercise before beginning construction work. Handouts summarizing this information will be provided to all construction and maintenance personnel. At a minimum, the education program will include the following aspects:</p> <ul style="list-style-type: none"> • Biology and status of the FTHL • Protection measures designed to reduce potential impacts to the species • Function of flagging designating authorized work areas • Reporting procedures to be used if an FTHL is encountered in the field • Importance of exercising care when commuting to and from the project area to reduce mortality of FTHLs on roads. <p>Work with the project supervisor to take steps, as necessary, to avoid disturbance to FTHLs and their habitat. If avoiding disturbance to a FTHL is not possible or if a FTHL is found trapped in an excavation, the affected lizard will be captured by hand and relocated.</p> <p>No dogs are allowed on the project site.</p> <p>All trash and food items will be promptly contained within closed, raven-proof containers. These will be regularly removed from the project site to reduce the attractiveness of the area to ravens and other FTHL predators.</p>	Threatened and Endangered Species and Special-Status Species—Wildlife	SCR 107.10
11	<p>The BLM will provide utility owner contact lists to the FHWA-CFLHD. These contacts will be added to the construction documents and the contractor will be responsible for contacting the utility owners prior to construction.</p> <p>Underground portions of the traffic counter will be located and removed and replaced during construction.</p>	Utilities	SCR Table 107-1

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No.	Mitigation	Resources	FP/SCR
12	<p>A National Pollutant Discharge Elimination System (NPDES) permit will be required from the Water Quality Regional Board of San Diego, the governing agency.</p> <p>A Storm Water Pollution Prevention Plan (SWPPP) for the site will be developed by the FHWA engineering consultant and approved by the BLM and FHWA. The purpose of the SWPPP is to prevent offsite migration of contaminated stormwater or increased soil erosion.</p> <p>The contractor will coordinate with the Imperial Irrigation District to potentially obtain permits to use water for construction from the nearby Coachella Canal (two permits required) or the All-American Canal (one permit required). The contractor also has the option of bringing water to the site from a location outside of the ISDRA.</p>	Water Quality	SCR 107.01
Gecko Road only			
13	A pre-construction survey will be conducted by the BLM.	Threatened and Endangered Species and Special-Status Species—Vegetation	SCR 107.10

No.	Mitigation	Resources	FP/SCR
14	<p>Prior to project initiation, an individual shall be designated as a field contact representative. The field contact representative will have the authority to ensure compliance with protective measures for the Flat-Tailed Horned Lizard (FTHL) and will be the primary agency contact dealing with these measures. The field contact representative will have the authority and responsibility to halt activities that are in violation of these terms and conditions.</p> <p>All project work areas will be clearly flagged or similarly marked at the outer boundaries to define the limit of work activities. All construction and restoration workers will restrict their activities and vehicles to areas that have been flagged to eliminate adverse impacts to the FTHL and its habitat. All workers will be instructed that their activities are restricted to flagged and cleared areas.</p> <p>A BLM monitor will be present as determined by the BLM authorized officer throughout the work day from initial clearing through habitat restoration, except where the project is completely fenced and cleared of FTHLs by a BLM biologist.</p> <p>The Contractor will develop and implement a worker education program that will be given to all individuals as a routine on-boarding exercise before beginning construction work Handouts summarizing this information will be provided to all construction and maintenance personnel. At a minimum, the education program will include the following aspects:</p> <ul style="list-style-type: none"> • Biology and status of the FTHL • Protection measures designed to reduce potential impacts to the species • Function of flagging designating authorized work areas • Reporting procedures to be used if an FTHL is encountered in the field • Importance of exercising care when commuting to and from the project area to reduce mortality of FTHLs on roads. <p>Work with the project supervisor to take steps, as necessary, to avoid disturbance to FTHLs and their habitat. If avoiding disturbance to a FTHL is not possible or if a FTHL is found trapped in an excavation, the affected lizard will be captured by hand and relocated.</p> <p>No dogs are allowed on the project site.</p> <p>All trash and food items will be promptly contained within closed, raven-proof containers. These will be regularly removed from the project site to reduce the attractiveness of the area to ravens and other FTHL predators.</p>	Threatened and Endangered Species and Sensitive Species - Wildlife	SCR 107.10
15	<p>The BLM will provide utility owner contact lists to the FHWA- CFLHD. These contacts will be added to the construction documents and the contractor will be responsible for contacting the utility owners prior to construction.</p> <p>Underground portions of the traffic counter on the west side of Gecko Road near the intersection with CA Hwy 78 will be located and removed and replaced during construction.</p>	Utilities	SCR Table 107-1

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No.	Mitigation	Resources	FP/SCR
16	<p>A National Pollutant Discharge Elimination System (NPDES) permit will be required from the Water Quality Regional Board of San Diego, the area governing agency.</p> <p>A Storm Water Pollution Prevention Plan (SWPPP) for the site will be developed to prevent offsite migration of contaminated stormwater or increased soil erosion.</p> <p>The contractor will coordinate with the Imperial Irrigation District to potentially obtain permits to draft water for construction from the nearby Coachella Canal (two permits required).</p>	Water Quality	SCR 107.01

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1 **Appendix C: Mitigation Summary Table for the Grays Well Road and Gecko Road Networks**

Resource	Anticipated Effect of the Proposed Action	Mitigation Measure
Mitigation for Both the Grays Well Road and Gecko Road Networks		
Air Quality	Construction vehicles would stir up fugitive dust and add to the particulate matter in the project area.	BMPs will be implemented to minimize fugitive dust during construction.
Hazardous Substances	During construction, there would be a potential for the release of petroleum products, diesel, oil, or oil products from vehicles.	No disposal of hazardous or non-hazardous waste is allowed on public lands. Therefore, before starting construction, the contractor will submit to FHWA-CFLHD and the BLM a Spill Prevention, Control, and Countermeasure (SPCC) plan that outlines procedures for dealing with incident spills and the legal disposal of spill material.
Noxious Weeds	During construction, there would be a potential for movement of seed and plant parts on motor vehicles, or for ground-disturbing activities to result in areas being colonized by noxious weed species, thereby preventing the establishment of native vegetation.	All equipment and vehicles will be cleaned and inspected to ensure they are free of sediment and debris that may introduce the spread of noxious weeds and/or non-native invasive species.
Recreation	<p>The Proposed Action would improve access throughout the Grays Well Road and Gecko Road networks and provide recreationists with uniform road widths and shoulders.</p> <p>The roads would have visible road markings and signs that meet current standards.</p> <p>Midway Campground near Grays Well Road will serve as the construction staging area, but since construction will take place during the off-season, few to no campers will be using the campground. Access to the Historic Plank Road Interpretive site would be limited</p>	Construction and the closure of Grays Well Road, including Midway Campground, and the closure of the Gecko Road network would be scheduled during the off-season season between May and September.
Invasive Plant Species	During construction, there would be a potential for movement of seed and plant parts on motor vehicles, or for ground-disturbing activities to result in areas being colonized by invasive plant species, thereby preventing the establishment of native vegetation.	All equipment and vehicles will be cleaned and inspected to ensure they are free of sediment and debris that may introduce or spread of invasive plant species, non-native plants, and/or noxious weeds.

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Resource	Anticipated Effect of the Proposed Action	Mitigation Measure
Mitigation for Grays Well Road Only		
Cultural Resources	Repaving and/or shoulder construction of the Grays Well Road network will occur in the vicinity of the relocated segments of the Plank Road and has the potential to affect this historic property if measures that are identified below are not taken to keep construction activities away from Plank Road segments.	Before construction activities occur in the vicinity of relocated portions of the Plank Road, the contractor will flag off the site to ensure construction activity does not affect the historic resource. A qualified BLM archaeologist must be present during construction in those areas to ensure that ground-disturbing activity does not affect the historic property. The contractor shall provide the BLM a minimum of 2 weeks (14 calendar days) notice prior to the start of construction activities.
Threatened and Endangered Species and Special-Status Species—Vegetation	Construction of the new road may result in impacts to four BLM sensitive species. Wiggin’s Croton will have approximately 1,000 individual plants impacted. Algodones Dunes Sunflower, Giant Spanish Needle, and Sandfood do occur occasionally along the existing road. It is estimated that no more than a few plants of each species will be impacted by construction activities.	A pre-construction survey will be conducted by the BLM.

Resource	Anticipated Effect of the Proposed Action	Mitigation Measure
<p>Threatened and Endangered Species and Special-Status Species—Wildlife</p>	<p>There may be direct impacts to individual lizards during construction. Both species rely on burying themselves in sand or suitable habitat, making them difficult to detect. While hiding, they become more vulnerable to construction-related injuries.</p>	<p>Prior to project initiation, an individual shall be designated as a field contact representative. The field contact representative will have the authority to ensure compliance with protective measures for the Flat-Tailed Horned Lizard (FTHL) and will be the primary agency contact dealing with these measures. The field contact representative will have the authority and responsibility to halt activities that are in violation of these terms and conditions.</p> <p>All project work areas will be clearly flagged or similarly marked at the outer boundaries to define the limit of work activities. All construction and restoration workers will restrict their activities and vehicles to areas that have been flagged to eliminate adverse impacts to the FTHL and its habitat. All workers will be instructed that their activities are restricted to flagged and cleared areas.</p> <p>A BLM monitor will be present as determined by the BLM authorized officer throughout the work day from initial clearing through habitat restoration, except where the project is completely fenced and cleared of FTHLs by a BLM biologist.</p> <p>The Contractor will develop and implement a worker education program that will be given to all individuals as a routine on-boarding exercise before beginning construction work. Handouts summarizing this information will be provided to all construction and maintenance personnel. At a minimum, the education program will include the following aspects:</p> <ul style="list-style-type: none"> • Biology and status of the FTHL • Protection measures designed to reduce potential impacts to the species • Function of flagging designating authorized work areas • Reporting procedures to be used if an FTHL is encountered in the field • Importance of exercising care when commuting to and from the project area to reduce mortality of FTHLs on roads. <p>Work with the project supervisor to take steps, as necessary, to avoid disturbance to FTHLs and their habitat. If avoiding disturbance to a FTHL is not possible or if a FTHL is found trapped in an excavation, the affected lizard will be captured by hand and relocated.</p> <p>No dogs are allowed on the project site.</p> <p>All trash and food items will be promptly contained within closed, raven-proof containers. These will be regularly removed from the project site to reduce the attractiveness of the area to ravens and other FTHL predators.</p>
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Resource	Anticipated Effect of the Proposed Action	Mitigation Measure
Utilities	<p>It is anticipated that no utility relocations will be required during construction. However, underground utilities will be located and verified before construction to avoid disturbance.</p> <p>Underground components of the traffic counter might be damaged during construction.</p>	<p>The BLM will provide utility owner contact lists to the FHWA-CFLHD. These contacts will be added to the construction documents and the contractor will be responsible for contacting the utility owners prior to construction.</p> <p>Underground components of the traffic counter on the west side of Gecko Road near the intersection with CA Hwy 78 will be located and removed and replaced during construction.</p>
Water Quality	<p>The Proposed Action would potentially use water from the All-American Canal or the New Coachella Canal for dust control during construction. The Grays Well Road project is not expected to affect groundwater because subsurface excavation will not reach groundwater depths.</p>	<p>A National Pollutant Discharge Elimination System (NPDES) permit will be required from the Water Quality Regional Board of San Diego, the governing agency. The BLM will assume responsibility for the NPDES permit upon completion of construction.</p> <p>A Storm Water Pollution Prevention Plan (SWPPP) for the site will be developed by the FHWA engineering consultant and approved by the BLM and FHWA. The purpose of the SWPPP is to prevent offsite migration of contaminated stormwater or increased soil erosion.</p> <p>The contractor will coordinate with the Imperial Irrigation District to potentially obtain permits to use water for construction from the nearby Coachella Canal (two permits required) or the All-American Canal (one permit required). The contractor also has the option of bringing water to the site from a location outside of the ISDRA.</p>

Resource	Anticipated Effect of the Proposed Action	Mitigation Measure
Mitigation for Gecko Road Only		
Threatened and Endangered Species and Special-Status Species—Vegetation	The proposed road improvements to the Gecko Road network may result in impacts to four BLM sensitive species—Wiggin’s Croton, Algodones Dunes Sunflower, Sandfood, and Giant Spanish Needle—that occur occasionally (in time) along the road. Wiggin’s Croton will have approximately 1,000 individual plants impacted, but this loss of individual plants will have an undetectable impact on the plant population as a whole due to the low number of plants impacted relative to the population numbers found throughout the ISDRA. It is estimated that no more than a few plants of Algodones Dunes Sunflower, Sandfood, and Giant Spanish Needle will be impacted by improvements to the road.	A pre-construction survey will be conducted by the BLM.

Resource	Anticipated Effect of the Proposed Action	Mitigation Measure
<p>Threatened and Endangered Species and Special-Status Species—Wildlife</p>	<p>There may be direct impacts to individual lizards during construction. Both species rely on burying themselves in sand or suitable habitat, making them difficult to detect. While hiding, they become more vulnerable to construction-related injuries.</p>	<p>Prior to project initiation, an individual shall be designated as a field contact representative. The field contact representative will have the authority to ensure compliance with protective measures for the FTHL and will be the primary agency contact dealing with these measures. The field contact representative will have the authority and responsibility to halt activities that are in violation of these terms and conditions.</p> <p>All project work areas will be clearly flagged or similarly marked at the outer boundaries to define the limit of work activities. All construction and restoration workers will restrict their activities and vehicles to areas that have been flagged to eliminate adverse impacts to the FTHL and its habitat. All workers will be instructed that their activities are restricted to flagged and cleared areas.</p> <p>A BLM monitor will be present as determined by the BLM authorized officer throughout the work day from initial clearing through habitat restoration, except where the project is completely fenced and cleared of FTHLs by a BLM biologist.</p> <p>The Contractor will develop and implement a worker education program that will be given to all individuals as a routine o-boarding exercise before beginning construction work. Handouts summarizing this information will be provided to all construction and maintenance personnel. At a minimum, the education program will include the following aspects:</p> <ul style="list-style-type: none"> • Biology and status of the FTHL • Protection measures designed to reduce potential impacts to the species • Function of flagging designating authorized work areas • Reporting procedures to be used if an FTHL is encountered in the field • Importance of exercising care when commuting to and from the project area to reduce mortality of FTHLs on roads. <p>Work with the project supervisor to take steps, as necessary, to avoid disturbance to FTHLs and their habitat. If avoiding disturbance to a FTHL is not possible or if a FTHL is found trapped in an excavation, the affected lizard will be captured by hand and relocated.</p> <p>No dogs are allowed on the project site.</p> <p>All trash and food items will be promptly contained within closed, raven-proof containers. These will be regularly removed from the project site to reduce the attractiveness of the area to ravens and other FTHL predators.</p>

Resource	Anticipated Effect of the Proposed Action	Mitigation Measure
Utilities	<p>It is anticipated that no utility relocations would be required during construction; however, underground utilities would be located and verified before construction to avoid disturbance.</p> <p>The traffic counter on the west side of Gecko Road could be damaged during construction.</p>	<p>The BLM will provide utility owner contact lists to the FHWA-CFLHD. These contacts will be added to the construction documents and the contractor will be responsible for contacting the utility owners prior to construction.</p> <p>Underground components of the traffic counter will be located and removed and replaced during construction.</p>
Water Quality	<p>For the Proposed Action, the contractor would use water from the New Coachella Canal during construction for dust control. The Gecko Road project is not expected to affect groundwater because subsurface excavation would not reach groundwater depths.</p>	<p>A National Pollutant Discharge Elimination System (NPDES) permit will be required from the Water Quality Regional Board of San Diego, the area governing agency.</p> <p>A Storm Water Pollution Prevention Plan (SWPPP) for the site will be developed and submitted to the BLM to prevent offsite migration of contaminated stormwater or increased soil erosion.</p> <p>The contractor will coordinate with the Imperial Irrigation District to potentially obtain permits to use water for construction from the nearby Coachella Canal (two permits required). The contractor also has the option of bringing water to the site from a location outside of the ISDRA.</p>

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United States Department of the Interior
Bureau of Land Management
DOI-BLM-D070-2015-0084-EA

DRAFT Finding of No Significant Impact
Grays Well Road and Gecko Road Improvements
Imperial County, California

U.S. Department of the Interior
Bureau of Land Management
El Centro Field Office
1661 South 4th Street
El Centro, CA 92243

August 2015



INTRODUCTION

Environmental Assessment (EA) #-BLM-D070-2015-0084-EA documents the evaluation of planned road improvements for two roads within the Imperial Sand Dunes Recreation Area (ISDRA) located in Imperial County, California. The project is proposed by the Bureau of Land Management (BLM) El Centro Field Office and the Federal Highway Administration, Central Federal Lands Highway Division (FHWA-CFLHD). The 5.1-mile Grays Well Road and the 7.7-mile Gecko Road would be improved, depending on funding availability. The existing Grays Well Road network includes Luis Aguilar Road, Buttercup Campgrounds, and Plank Road. The existing Gecko Road network includes Gecko Road Campground, Keyhole Campground, and Roadrunner Campground.

The EA analyzes the environmental impacts and mitigation for surface improvements and reconstruction of vehicle pullouts, parking areas, and campgrounds for Grays Well Road and Gecko Road, collectively referred to as the Proposed Action. Following the requirements of the National Environmental Policy Act (NEPA) (40 CFR 1508.9 (a)), the EA describes the potential impacts of a No-Action Alternative and the Proposed Action for each of the road improvements.

Identifying Information

- Project: Grays Well Road and Gecko Road Improvements
- CFLHD Project Number: CA FTBL 67113 (1)—Grays Well Road
- CFLHD Project Number: CA FTBL 67110 (1)—Gecko Road
- BLM-D070-2015-0084-EA: Prepared: August 2015

Name and Location of Preparing Office

Bureau of Land Management
El Centro Field Office
1661 South 4th Street
El Centro, California 92243

Location of the Project

As shown in Figure 1 of the EA, the existing paved Grays Well Road and Gecko Road networks are located within the ISDRA in southeastern California near the international border with Mexico. The roads provide access to portions of the 164,000-acre recreation area, which has been designated as a Special Recreation Management Area (SRMA). ISDRA is within the California Desert Conservation Area (CDCA) and is considered one of the premier off-highway vehicle (OHV) locations in the United States. Both roads provide easily accessible recreational opportunities for outdoor enthusiasts.

CONSISTENCY WITH LAND USE PLANS, LAWS, REGULATIONS AND POLICIES

Below is a list of plans with a discussion on how the proposed Grays Well Road and Gecko Road improvements conform to each plan.

California Desert Conservation Area (CDCA) Plan, 1980, as Amended

The ISDRA is a 215,000-acre recreation area contained within the 25-million acre CDCA. The purpose of the CDCA Plan is to establish guidance for the management of the public lands of the California desert by the BLM in accordance with the 1976 Federal Land Policy Management Act (FLPMA). There is a Motorized-Vehicle Access Element to the CDCA Plan with goals for providing a system and set of rules governing access to the CDCA by motor vehicles.

The proposed Grays Well Road and Gecko Road improvements are consistent with the CDCA Plan by providing motorized vehicle access on the existing road network, thereby balancing the needs of all desert users while avoiding adverse impacts to desert resources.

Imperial Sand Dunes Proposed RAMP/CDCA Plan Amendment and Final EIS, June 2013

The ISDRA RAMP and Record of Decision (ROD) were completed in June 2013. According to the ROD, the Grays Well Road network and the Gecko Road network have been designated as BLM “routes of travel” and are limited to street-legal vehicles only. Goals, objectives, and management actions are included in the document that address ways to minimize impacts to sensitive resources, reduce conflict between users, and provide for visitor safety.

The proposed Grays Well Road and Gecko Road improvements constitute a rehabilitation, restoration, and resurfacing project that is consistent with the Final EIS and ROD because it will maintain and improve visitor access in the ISDRA.

SELECTED ALTERNATIVE

The EA for this project analyzed a proposed action and a no action alternative. The selected alternative is the proposed action as described in chapter 2 of the EA.

FINDING OF NO SIGNIFICANT IMPACT

The El Centro Field Office interdisciplinary review and analysis determined that the Proposed Action would not trigger significant impacts on the environment based on criteria established by regulations, policy and analysis.

Based on the findings discussed herein, I conclude that the proposed action is not a major Federal action and will result in no significant impacts to the environment, individually or cumulatively with other actions in the general area. No environmental effects meet the definition of significance in context or intensity as defined in 40 CFR 1508.27 and do not exceed those effects described in applicable land use plans. Therefore, preparation of an environmental impact statement (EIS) to further analyze possible impacts is not required pursuant to Section 102(2)(c) of the NEPA of 1969.

This determination is based on the rationale that the significance criteria, as defined by the Council on Environmental Quality (CEQ) (40 CFR 1508.27) have not been met. “Significantly” as used in NEPA requires considerations of both context and intensity.

In making this Finding of No Significant Impact (FONSI), the following criteria have been considered, in accordance with the Council on Environmental Quality (CEQ), 40 C.F.R. 1508.27.

Context: This means that the significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both short and long term effects are relevant.

Environmental impacts associated with the proposed action have been assessed by an interdisciplinary team and described in EA #BLM-D070-2015-0084-EA. The Proposed Action would occur within the 215,000-acre ISDRA boundary. It involves approximately 5.1 miles of the Grays Well Road network and 7.7 miles of the Gecko Road network. Both long-term and short-term effects are relevant within the recreation area and do not expand beyond the ISDRA. The Proposed Action is consistent with the CDCA Plan, 1980 as amended, and the Imperial Sand Dunes Proposed RAMP/CDCA Plan Amendment and Final EIS, September 2012. The context of the EA analysis was determined to be at a local and regional scale in Imperial County, California. The effects of the action are not applicable on a national scale since no nationally significant values were involved.

Intensity: This refers to the severity of impact. The following discussion is organized around the Ten Significance Criteria described in 40 CFR 1508.27 and supplemental Instruction Memorandum, Acts, regulations and Executive Orders. The following have been considered in evaluating intensity for this proposal:

1) Impacts can be both beneficial and adverse and a significant effect may exist regardless of the perceived balance of effects.

Potential beneficial and adverse environmental impacts have been disclosed in the EA. Measures to mitigate impacts have been incorporated into the design of the Proposed Action. Analysis indicated no significant impacts on society as a whole, the affected region, or within the ISDRA.

2) The degree to which the selected alternative will affect public health or safety.

Public health and safety would not be adversely impacted during or after construction. Both roads will be closed during construction between May 1 and September 15. The selected alternative will improve public health and safety by providing smooth roads, improve parking and camping areas, and ensure access to facilities and information within the ISDRA.

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

The historic and cultural resources of the area around the Grays Well Road and Gecko Road networks have been reviewed by the BLM. The potential effects have been identified in the EA

and mitigation measures will be required to ensure that historic properties are not affected. There would be no adverse effect to historic and cultural resources around the Grays Well Road or Gecko Road networks. The North Algodones Dunes Wilderness Area is north of CA Highway 78 and northwest of the project area. Construction activities for the project are not expected to impact this area. There are no impacts to prime farmlands, ecologically critical areas or wild and scenic rivers.

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

The proposed road improvements will enhance the human environment and improve access throughout the ISDRA. No anticipated effects have been identified that are controversial.

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

Improving the Grays Well and Gecko Road networks are common activities that have highly predictable effects on the human environment and do not have unique or unknown risks.

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

These road improvements neither establish a precedent nor represent a decision in principle about future actions. Any future road improvements beyond the scope of those analyzed within the EA would be subject to additional site-specific NEPA analysis and documentation. Cumulative impacts as defined in Section 1508.7 of the CEQ regulations, 40 CFR Sections 1500 to 1508, were assessed in the context of past, present, and reasonably foreseeable future actions. A discussion is included in the EA.

7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts – which include connected actions regardless of land ownership.

The proposed action was analyzed in the context of past, present, and reasonably foreseeable future actions. No significant cumulative effects were identified or predicted.

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

The selected action will not adversely affect districts, sites, highways, structures, or other objects listed in or eligible for listing in the National Register of Historic Places. Nor will it cause loss or destruction of significant scientific, cultural, or historical resources. The remnants of the Plank Road will be avoided.

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

the degree to which the action may adversely affect: 1) a proposed to be listed endangered or threatened species or its habitat, or 2) a species on BLM's sensitive species list.

The selected alternative will not adversely affect an endangered or threatened species or its habitat. Biological mitigation measures will be implemented to ensure the reduction in impacts to individual animals that may be affected by the selected alternative.

10) Whether the action threatens a violation of a federal, state, local, or tribal law, regulation or policy imposed for the protection of the environment, where non-federal requirements are consistent with federal requirements.

The Proposed Action does not violate any known federal, state, or local law or requirements imposed for the protection of the environment. In addition, the project is consistent with applicable land management plans, policies and programs.

Reviewed by: _____
Carrie Simmons, Resources Branch Supervisor Date _____

Approved by: _____
Thomas F. Zale, Field Manager Date _____
El Centro Field Office