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Department of
Agriculture

Forest
Service

August 2004



Environmental Assessment

Approval of Pine Canyon Camp Master Development Plan and Amendment of Special Use Permit

**Douglas Ranger District, Coronado National Forest
Cochise County, Arizona**

Located within S. 30, Unsurveyed T17S, R30E, G&SRM

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TABLE OF CONTENTS

	<u>Page</u>
SUMMARY	vii
1.0 INTRODUCTION	1
1.1 BACKGROUND	1
1.2 PROPOSED ACTION	2
1.2.1 Purpose of and Need for Agency Action	2
1.2.2 Public Involvement	2
2.0 ALTERNATIVES, INCLUDING THE PROPOSED ACTION	5
2.1 PREFERRED ALTERNATIVE (PROPOSED ACTION)	5
2.2 NO ACTION	5
2.3 MODIFIED MASTER PLAN	6
3.0 ENVIRONMENTAL CONSEQUENCES	7
3.1 GEOLOGY AND SOILS	7
3.1.1 Proposed Action	7
3.1.2 No Action	7
3.1.3 Modified Master Plan	7
3.2 ECOLOGICAL RESOURCES	7
3.2.1 Threatened and endangered species	8
3.2.1.1 Proposed Action	9
3.2.1.2 No Action	9
3.2.1.3 Modified Master Plan	9
3.2.2 Floodplain and Wetlands	9
3.2.2.1 Proposed Action	9
3.2.2.2 No Action	9
3.2.2.3 Modified Master Plan	9
3.3 WATER RESOURCES	10
3.3.1 Proposed Action	10
3.3.2 No Action	10

3.3.3 Modified Master Plan	10
3.4 AIR QUALITY	10
3.4.1 Proposed Action	10
3.4.2 No Action	11
3.4.3 Modified Master Plan	11
3.5 AMBIENT NOISE	11
3.5.1 Proposed Action	11
3.5.2 No Action	11
3.5.3 Modified Master Plan	11
3.6 RECREATION AND VISUAL QUALITY	11
3.6.1 Proposed Action	11
3.6.2 No Action	13
3.6.3 Modified Master Plan	13
3.7 CULTURAL RESOURCES	13
3.7.1 Proposed Action	13
3.7.2 No Action	13
3.7.3 Modified Master Plan	14
3.8 ENVIRONMENTAL JUSTICE	14
3.9 CUMULATIVE IMPACTS	14
4.0 CONSULTATION AND COORDINATION	15
5.0 LIST OF PREPARERS	17
6.0 REFERENCES	19
APPENDIX A: CONSULTATION IN ACCORDANCE WITH THE NATIONAL HISTORIC PRESERVATION ACT AND WITH NATIVE AMERICAN TRIBES	21

LIST OF FIGURES

Figure 1 - Location of Pine Canyon Methodist Camp, Douglas Ranger District	3
Figure 2 - United Methodist Pine Canyon Camp area operated under a Special Use Permit from the U.S. Forest Service	4
Figure 3 - Location of Proposed Improvements within Pine Canyon Camp	6

LIST OF ACRONYMS AND ABBREVIATIONS

BE	Biological Evaluation
CAA	Clean Air Act
CEQ	President's Council on Environmental Quality
CLF	Chiricahua leopard frog
CWA	Clean Water Act
dbh	diameter at breast height
EA	Environmental Assessment
FR	Forest Road
FWS	U.S. Fish and Wildlife Service
MSO	Mexican spotted owl
NEPA	National Environmental Policy Act
NFS	National Forest System
ROS	Recreation Opportunity Spectrum
SHPO	State Historic Preservation Office
SUP	Special Use Permit
VQO	Visual Quality Objective

SUMMARY

The Desert Southwest Annual Conference of the United Methodist Church (Church) operates and maintains a 125-bed organizational camp on National Forest System lands within the Douglas Ranger District, Coronado National Forest. Because of long-term use, the age of the existing structures, and funding limitations, the Camp's 50+-year-old facilities are in need of repair and/or remodeling, and the need for additional structures has arisen.

In 2003, the Church requested that the Forest Service review and approve its Pine Canyon Camp Master Development Plan (Plan) for the 16.6-acre Camp site. The Forest Service is proposing to take administrative action to approve the Plan, as submitted. Approval is needed before an amendment to the Special Use Permit (SUP) can be processed. An amended SUP, in turn, would authorize the Church to begin its improvements to Camp facilities. Thus, the focus of the National Environmental Policy Act (NEPA) review shall be to evaluate the impacts of all activities that comprise the Church's proposed project.

As part of a NEPA review of the proposed action, the Forest Supervisor solicited public comments on the scope of alternatives and issues related to the Church's request for an amended SUP. These comments were considered during the preparation of this environmental assessment (EA).

Potential impacts were evaluated for three alternatives: the no action alternative, a modified Plan alternative, and the preferred action, which is to accept the Plan as submitted and approve an amendment to the SUP.

The findings of impact analyses reported in this EA are that no adverse impacts to the environment would result from implementation of the preferred alternative.

1.0 INTRODUCTION

This environmental assessment (EA) was prepared by the U.S. Department of Agriculture, Forest Service, to evaluate the potential environmental consequences of approving a Master Development Plan and amending a Special Use Permit (SUP) issued to the United Methodist Church for the use of National Forest System (NFS) lands as the site of an organizational camp facility. The format and content of the EA meets the requirements of the President's Council on Environmental Quality (CEQ) Regulations Implementing the National Environmental Policy Act (NEPA) (40 CFR Parts 1500-1508), the Forest Service Environmental Policy and Procedures Manual (FSM 1950), and the Forest Service Environmental Policy and Procedures Handbook (FSH 1909.15).

This EA discloses the direct, indirect, and cumulative environmental impacts that would result from implementation of the proposed action and alternatives. The document is organized as follows:

- *Introduction:* This section includes information on the background and history of the proposed action/project and the purpose of and need for Forest Service action. This section also describes public involvement in the NEPA review process.
- *Alternatives, including the Proposed Action:* This section provides details describing the agency's proposed action and discusses reasonably foreseeable alternatives to the proposed action as well as the no-action alternative, which is required to be evaluated by CEQ regulations. The discussion also identifies specific mitigation measures, if any, that are required to minimize potential adverse impacts.
- *Environmental Consequences:* This section describes the environmental effects of implementing the proposed action and the alternatives, by resource area. Within each section, the affected environment is described first, followed by a discussion of the potential consequences of each alternative.
- *Agencies and Persons Consulted:* This section identifies persons who contributed to the preparation of this EA and lists agencies and persons consulted during the NEPA review process.
- *Appendices:* If necessary, appendices provide more detailed information to support the analyses presented in the environmental assessment.

Additional documentation, including more detailed analyses of project-area resources, may be found in the Administrative Record for the project at the Douglas Ranger District Office in Douglas, Arizona.

1.1 BACKGROUND

Since 1946, the Desert Southwest Annual Conference of the United Methodist Church (Church) has operated and maintained a 125-bed organizational camp (Camp) on 16.6 acres of Coronado National Forest land at Pine Canyon in the Chiricahua Mountains, Cochise County, Arizona. The Camp lies within the NW1/4 of Section 30, T17S, R30E,

Gila and Salt River Meridian (Figures 1 and 2). Most of the Camp's buildings, facilities, and infrastructure were constructed between 1953 and 1959. Since that time, the Camp has become a year-round rather than a summer-use facility.

Because of funding limitations, maintenance of Camp infrastructure and facilities has occurred on solely an as-needed basis. In 2003, the Church requested that the Forest Service review and accept its Pine Canyon Camp Master Plan (Plan) in anticipation of its intent to implement much-needed improvements, upgrades, and construction of new facilities on 5.5 acres within the boundaries of the permitted area.

1.2 PROPOSED ACTION

The Forest Service is proposing to take administrative action to approve the Plan, as submitted. Approval is needed before an amendment to the SUP can be processed.

An amended SUP, in turn, would authorize the Church to begin its improvements to Camp facilities. Thus, the focus of the NEPA review shall be to evaluate the impacts of all activities that comprise the Church's proposed project.

1.2.1 Purpose of and Need for Agency Action

The purpose of and need for agency action is driven by a Forest Service commitment to consider requests for special uses on National Forest System lands, an objective that is expressed in the 1986 Land and Resource Management Plan for the Coronado National Forest, as amended (Forest Plan, page 40, Management Prescription Applicable to All Areas of Forest, Special Use Management, item 3: *Land occupancy and use authorizations will be evaluated in light of their effects on the management, protection, development, and utilization of the resources and the long-term public interest in full recognition and response to the requirements and intent of the National Environmental Policy Act*).

Proposed improvements are necessary for Camp facilities to meet Americans with Disabilities Act access requirements, to meet current utility codes and environmental regulations, and to ensure the health and safety of all users.

1.2.2 Public Involvement

In November 2002, the Coronado National Forest Supervisor issued a notice to the general public that described the proposed project and requested comments on the scope of alternatives and issues related to the Church's Master Development Plan and request for an amended SUP. Comments that were received from the public expressed concern for the potential increase in the number of Camp users, adverse impacts to wildlife due to tree removal, increased light and dust pollution, potential for fuel reduction, and the introduction of non-native plant species. Those comments are

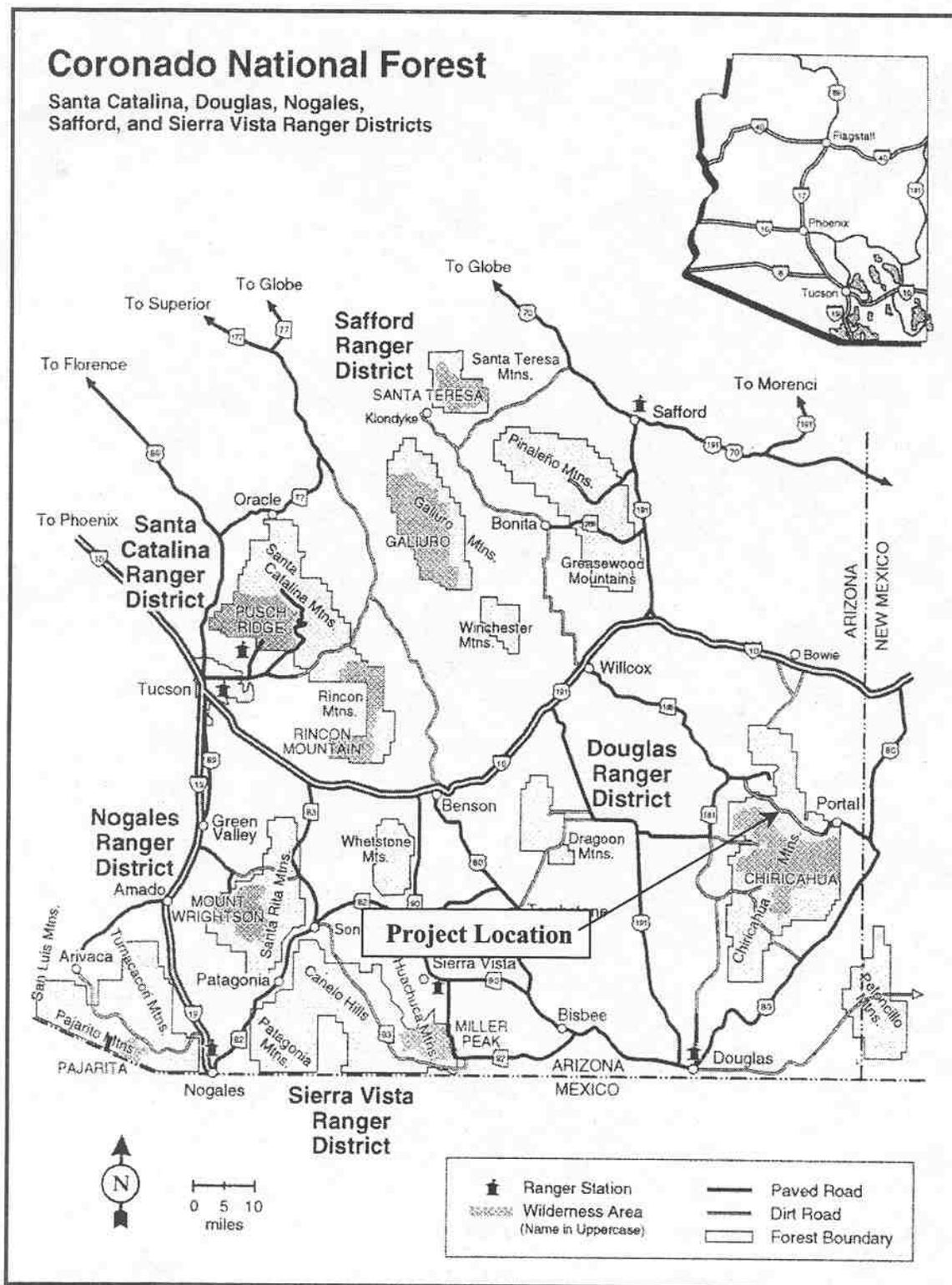
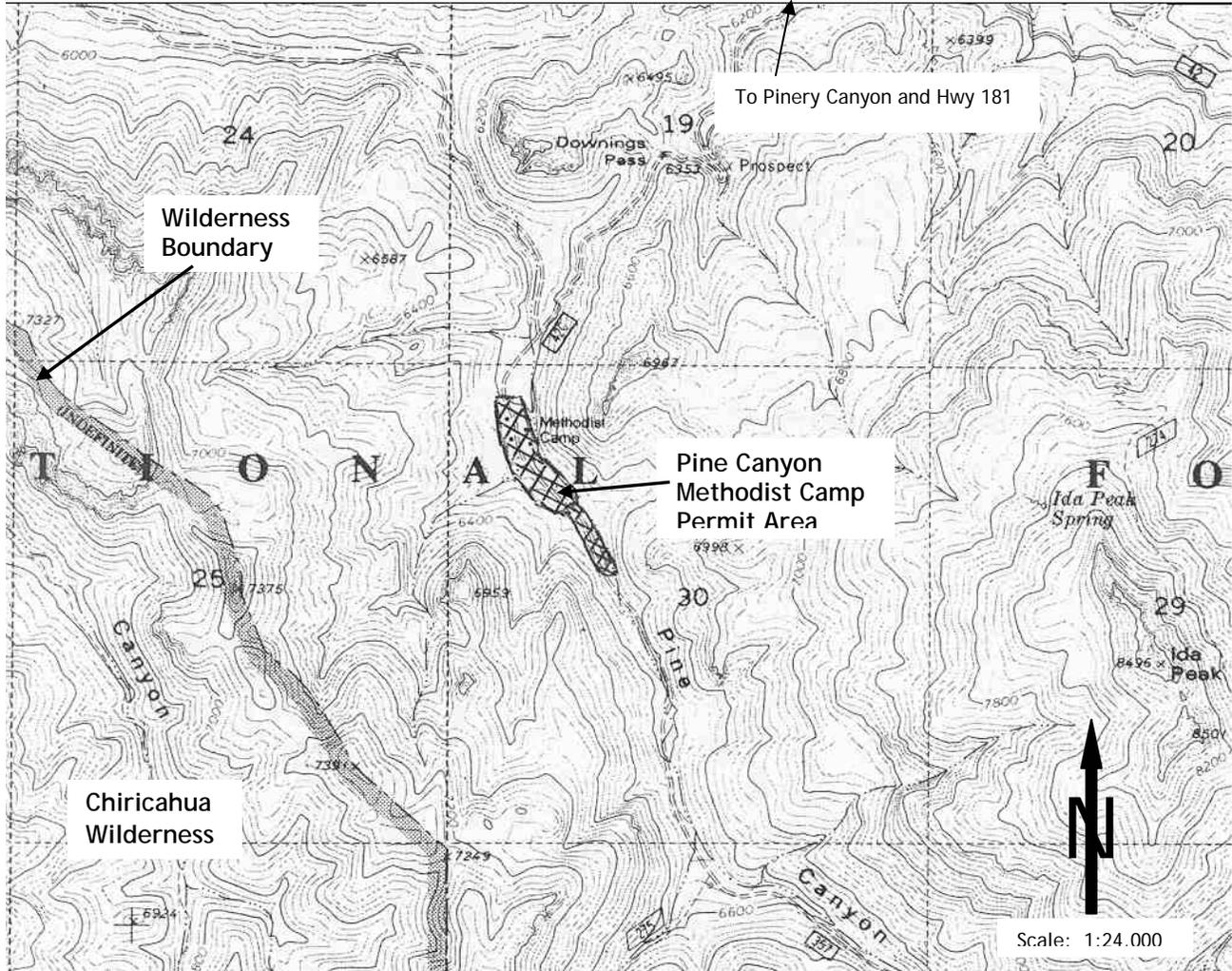


Figure 1. Location of Pine Canyon Methodist Camp, Douglas Ranger District.

Figure 2. United Methodist Pine Canyon Camp area operated under a Special Use Permit from the U.S. Forest Service.



considered to be relevant to the proposed action are addressed in the effects analysis presented in this EA.

The public will be afforded a second opportunity to comment on the proposed amendment to the SUP prior to the Forest Supervisor's decision on its implementation. In accordance with Forest Service *Notice, Comment and Appeal Procedures for National Forest System Projects and Activities* (36 CFR 215), persons who submit substantive comments concerning the proposed action during a 30-day comment period that follows publication of a Notice of Availability of the EA shall be eligible to appeal the decision following the procedures established in 36 CFR 215.15. If no appeals are received, implementation of a decision may begin on, but not before, the 5th business day following the close of the appeal-filing period (36 CFR 215.9).

2.0 ALTERNATIVES, INCLUDING THE PROPOSED ACTION

2.1 PREFERRED ALTERNATIVE (PROPOSED ACTION)

The Forest Service's preferred alternative is to approve the Master Plan and issue an amendment to the SUP. Approval, in turn, would allow the Church to undertake the following activities specified in the Plan:

- Phase One: upgrade Camp infrastructure (deteriorated wiring, plumbing, and septic system) and construct a 3119-square foot (ft²) maintenance complex and 2700-ft² manager's residence. These activities would be confined within the 16.6-acre camp area authorized by the SUP (see Figure 3). Work would begin as soon as a decision is rendered on an SUP amendment, with a target completion date of February 2005.
- Phase Two: remodel lodge, staff quarters and existing manager's residence to serve as administrative offices and a nurse's station. These activities would be undertaken following completion of Phase One and, as funds are available.
- Phase Three: remodel existing cabins, central baths, and restroom facilities and create a 1500- ft² indoor chapel. Construction plans for the indoor chapel will be presented to the Forest Service for review and approval prior to construction. These activities would be undertaken following completion of Phase Two and, as funds are available.

Detailed specifications have been submitted and approved by the Forest Service for Phase One activities¹, and details for Phases Two and Three would be submitted to the Forest Service prior to their implementation.

The new facilities to be added include a maintenance shop and a living quarter for the site manager already living on the permitted area. Remodeling of existing cabins would not increase bed space. Also, replanting of native vegetation species following construction would be required to adhere to the specific requirements of the SUP.

2.2 NO ACTION

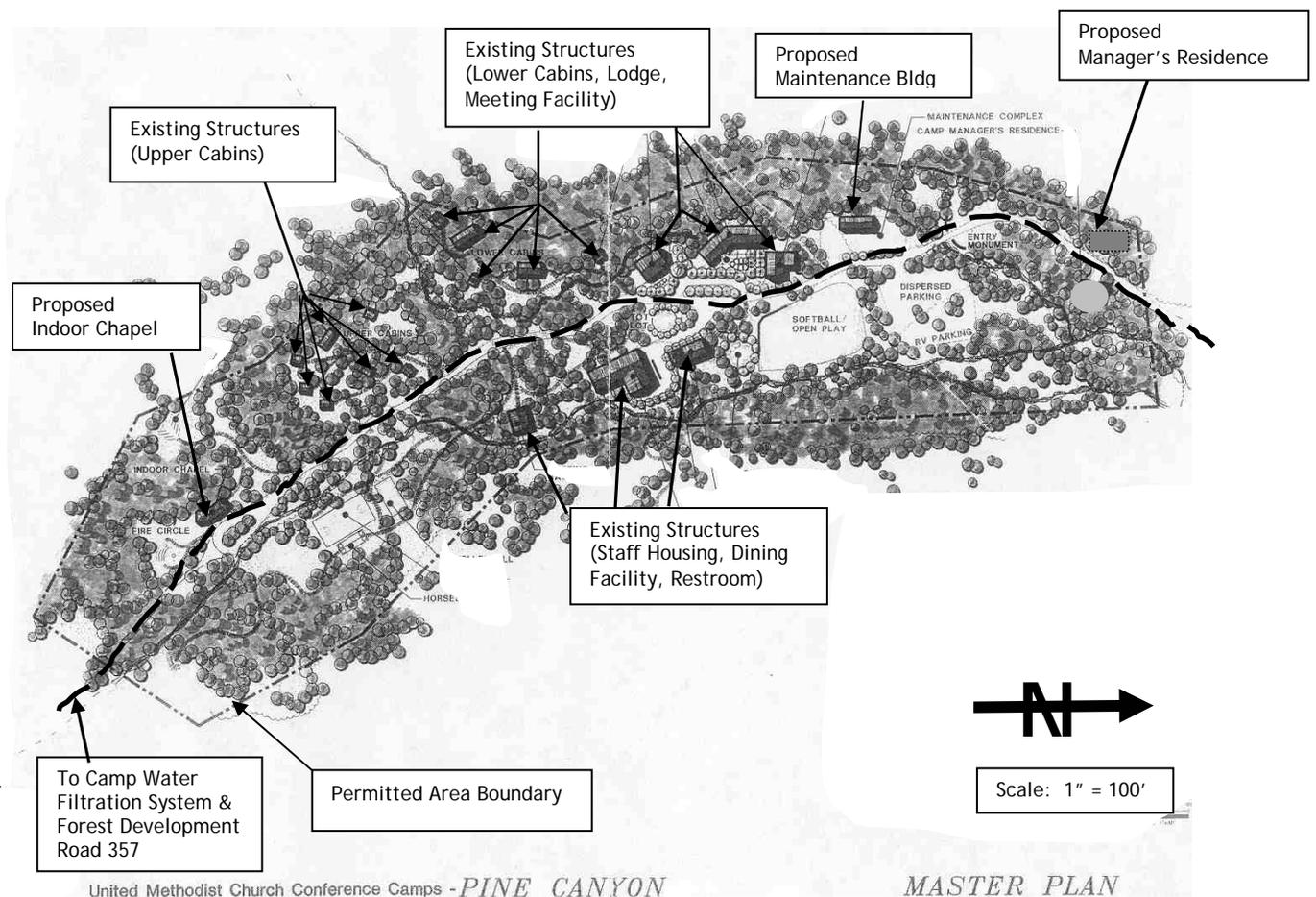
If no action is taken, the Forest Service would not approve the Plan, and a SUP amendment would not be issued. Management of operation and maintenance of the Camp would continue as previously undertaken and would not be directed toward achievement of the objectives established by the Plan. No new facilities would be constructed until another request for amendment is made and additional NEPA review is completed for specific undertakings.

¹ Plans for the new manager's residence and the maintenance building are on file at the Zone Lands & Special Uses Staff Office, 5990 S. Hwy 92, Hereford, AZ 85615. Plans for the indoor chapel will be submitted to the Forest Service for review and approval when funding becomes available.

2.3 MODIFIED MASTER PLAN

If this alternative were implemented, the Forest Service would adopt a Plan that does not include construction of new facilities. An amendment to the SUP would be issued to allow only a proposed upgrade of infrastructure and remodeling activities.

Figure 3.
Location of Proposed Improvements within Pine Canyon Camp.



United Methodist Church Conference Camps - *PINE CANYON*

MASTER PLAN

3.0 ENVIRONMENTAL CONSEQUENCES

3.1 GEOLOGY AND SOILS

3.1.1 Proposed Action

A potential source of impacts to soils is earthmoving and ground disturbance. Soils in the project area have a low to moderate resistance to erosion, and windy conditions are common. During the summer monsoon season, periods of heavy precipitation and thunderstorms are also frequent.

However, past ground-disturbing projects at the Camp have not resulted in problems with erosion. To ensure that such problems are minimized, the SUP will require that Best Management Practices (FSH 2509.22, Chapter 40) be used during ground-disturbing activities.

3.1.2 No Action

No impacts to soils would occur.

3.1.3 Modified Master Plan

The potential for erosion would be less than that associated with the preferred alternative because ground disturbance for a maintenance complex and manager's residence would not occur.

3.2 ECOLOGICAL RESOURCES

For over 50 years, human presence at the Camp site has grown increasingly more frequent. Terrestrial wildlife species common to the local area are often temporarily displaced by human activities, but many have become adapted to noise and other man-made disturbance.

Proposed improvements would be confined for the most part to areas where utility lines and structures already exist. Therefore, noticeable changes in populations of wildlife that presently co-exist with man at the site are unlikely. Vegetation loss would be minimal. Six trees less than 9 inches in diameter at breast height (dbh) would be lost if and when the manager's residence is built.

Because the potential for erosion and sediment runoff into Pine Canyon Creek is very low, aquatic species are unlikely to be adversely impacted.

3.2.1 Threatened and endangered species

3.2.1.1 Proposed Action

The Endangered Species Act requires that federal actions must not (1) jeopardize the continued existence of species that are federally listed or proposed as threatened or endangered, and (2) result in adverse modification to such species' designated critical habitat. In accordance with Section 7(c) of this Act, the Forest Service obtained information about listed and proposed threatened and endangered species and critical habitat in the project. The information indicated that the Camp is located within 2-miles of a documented Mexican spotted owl (MSO) (*Strix occidentalis lucida*) nest site, which was not damaged during the 1994 Rattlesnake fire, and within 1-mile of a MSO Protected Activity Center. In addition, the northern half of the Chiricahua Mountains, which includes the camp, has been proposed as critical habitat for the MSO; the proposal is currently under review by the U.S. Fish and Wildlife Service.

According to the Arizona Game and Fish Department's Heritage Database, the Chiricahua leopard frog (CLF) (*Rana chiricahuensis*) was observed in 1995 by University of Arizona scientists approximately three-quarters of a mile upcanyon from the Camp. Subsequent surveys have reported no observations of the CLF in the Pine Canyon drainage.

An impacts analysis addressing both species was documented in a Biological Evaluation (BE) prepared by a contractor and reviewed by the Douglas District Biologist. Based on his review and the gathering of subsequent data with further project clarifications, a "no effect" determination was made, with the condition that the amended SUP require that all construction be accomplished outside the MSO breeding season and, because the six trees to be cut will be of nine inches dbh or less, which is a size class unutilized by MSO, there will be no effects on critical MSO habitat.

Similarly, a determination of no effect to the CLF was made because the SUP will require that construction be conducted at a minimum of ¼ mile from known CLF habitat, and surface water in the Pine Canyon drainage would not be impacted.

In support of the no effect determination, the following measures will be required in the amended SUP:

- a. Use of heavy equipment (backhoes, jackhammers, plate tampers, ditch diggers, etc.) shall be permitted only during MSO non-breeding season (September 1 to February 28).
- b. Trees greater than nine inches dbh will NOT be cut, damaged, or removed for any phase of this project.

- c. Trees (smaller than nine inches dbh) planned for removal will be cut during the MSO non-breeding season (September 1 to February 28). Six trees will be cut (all of them are nine inches dbh or less), and these occur in and around the proposed site for the manager's residence.
- d. Environmental education of construction workers shall include identification of safe and appropriate human behaviors while in a forest environment, including fire safety, reduction of bear (and other animal)/human interactions, and non-harassment of all wildlife, especially nesting birds or young animals found by users.

3.2.1.2 No Action

No impacts to threatened and endangered species and critical habitat would occur.

3.2.1.3 Modified Master Plan

The potential for impacts to protected species would be less than that associated with the preferred alternative because ground disturbance for a maintenance complex and manager's residence would not occur.

3.2.2 Floodplain and Wetlands

3.2.2.1 Proposed Action

Executive Order 11988 requires consideration of potential adverse impacts associated with the occupancy and modification of floodplains. Floodplains are defined by this order as, "...the lowland and relatively flat areas adjoin inland and coastal water including flood prone areas of offshore islands, including at a minimum, that area subject to a one percent (100-year recurrence) or greater chance of flooding in any one year." The project is not located in a 100-year floodplain. This has been validated by map and field review.

Executive Order 11990 requires consideration of potential adverse impacts associated with destruction or modification of wetlands. Wetlands are defined by this order as, "areas inundated by surface or ground water with a frequency sufficient to support and under normal circumstances does or would support a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar area such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds. The project is not located in or near wetlands. This has been validated by map and field review.

3.2.2.2 No Action

No floodplain and wetlands impacts would occur.

3.2.2.3 Modified Master Plan

No floodplain and wetlands impacts would occur.

3.3 WATER RESOURCES

3.3.1 Proposed Action

Although the ephemeral Pine Canyon Creek runs through the Camp's permitted area, the proposed action would not occur near this surface water resource. Impacts to water resources are generally expressed as an incremental change in ambient concentrations of pollutants regulated under the Clean Water Act (CWA). Pursuant to the CWA, National Ambient Water Quality Standards were established by the U.S. Environmental Protection Agency to protect human health and safety. Primary pollutants for which standards exist include heavy metals, dissolved solids, fecal coliform bacteria, dissolved oxygen, pH, salinity, and temperature.

Potential sources of impacts to water quality include fugitive soil from traffic from vehicles and equipment operated during construction and facility upgrading. Impacts would be temporary, sporadic, and localized in the vicinity of operations and would most likely not reach the stream channel. Dispersion of pollutants in the stream channel would reduce concentrations of pollutants to negligible quantities beyond the permitted Camp boundaries. Thus, adverse effects on ambient water quality would not be expected to result from the proposed action.

3.3.2 No Action

No impacts to water supply and quality would occur.

3.3.3 Modified Master Plan

The potential for water quality impacts would be less than that associated with the preferred alternative because ground disturbance for a maintenance complex AND manager's residence would not occur.

3.4 AIR QUALITY

3.4.1 Proposed Action

Impacts to air quality are generally expressed as an incremental change in ambient concentrations of pollutants regulated under the Clean Air Act (CAA). Pursuant to the CAA, National Ambient Air Quality Standards were established by the U.S. Environmental Protection Agency to protect human health and safety. Primary pollutants for which standards exist are sulfur dioxide, nitrogen dioxide, ozone, lead, carbon monoxide and respirable particulate matter (<10 microns in diameter).

Potential sources of impacts to air quality include fugitive dust from traffic and exhaust emissions from vehicles and equipment operated during construction. Both gaseous and particulate pollutants would be emitted. Emissions would be temporary, sporadic, and localized in the vicinity of operations. Dispersion of pollutants in the atmosphere would reduce concentrations of pollutants to negligible quantities beyond the permitted Camp boundaries. Thus, adverse effects on ambient air quality would not be expected to result from the proposed action.

3.4.2 No Action

No impacts to air quality would occur.

3.4.3 Modified Master Plan

The potential for air quality impacts would be less than that associated with the preferred alternative because ground disturbance for a maintenance complex and manager's residence would not occur.

3.5 AMBIENT NOISE

3.5.1 Proposed Action

Ambient levels of noise at the camp would be increased during operation of vehicles and equipment involved in construction. The Church would minimize the potential disturbance to campers by scheduling construction during periods of low attendance. In any case, noise emissions from construction would not even approach levels that may cause temporary or permanent hearing loss in humans or wildlife species. Workers would be required to wear personal protective equipment to attenuate operational noise.

3.5.2 No Action

No changes in ambient noise levels would occur.

3.5.3 Modified Master Plan

The potential for noise impacts would be less than that associated with the preferred alternative because vehicle and equipment operation during construction of a maintenance complex and manager's residence would not occur.

3.6 RECREATION AND VISUAL QUALITY

3.6.1 Proposed Action

Implementation of the proposed action would have minimal effect on recreation opportunities for users of NFS lands outside of the Camp's permitted area. Persons

recreating on NFS lands in the Pine Canyon area may travel on Forest Development Road 357 (FR357) through the camp to access NFS lands upcanyon, but few people use this area due to the poor condition of the road. The users of the Camp's permitted area will have an improved experience from the upgraded and new facilities. Construction noise would temporarily affect recreation for both camp users and nearby visitors.

Exterior lighting on the new facilities would increase light intensity in the immediate vicinity. Using light shades to direct light down and restricting it to the desired location would lessen adverse effects.

The Recreation Opportunity Spectrum (ROS) setting for the camp is "Rural". Existing facilities (including a lodge, restrooms, cabins, and crew quarters) are appropriate in this setting. Proposed facilities will not change the setting, provided that mitigation measures specified in Section 3.6.4 are followed.

The current Visual Quality Objective (VQO) identified in the Forest Plan for the camp (and most of Pine Canyon) is "3B/M," meaning that the area is considered seldom seen, variety class B (common), and has a VQO of "Modification." VQO Modification allows for management activities to dominate the landscape, but they must be designed to complement their natural surroundings. Existing facilities meet this VQO, and the proposed facilities should also. However, it should be noted that the broad-brush VQO mapping for the Forest Plan needs to be reviewed at project level, and it is clear that FR 357, and camp users themselves, were not considered. In 2001, the CNF completed updated mapping of visual resources using the improved Scenery Management System. In doing so, FR 357 was identified as a Concern Level 2 travelway. Considering this new information, the VQO for the camp area would be in "Partial Retention" (PR), which allows management activities that are subordinate to the landscape. With implementation of the following mitigation measures, the proposed facilities would meet PR, and impacts to recreation settings and visual quality would be minimal:

1. Choose materials for new and remodeled facilities that blend with the landscape. Avoid synthetic materials. Select dark, neutral colors.
2. Site new facilities (especially the 3 large buildings) as far away from FR357 as possible and where vegetation can screen views to them from FR357.
3. Minimize damaging or removing vegetation.
4. Naturalize all disturbed areas (both existing and those created by construction). This may include tilling the soil, placing boulders and rock, seeding, and planting with native species.

5. At the expiration of the SUP, or when the camp is no longer used, remove all facilities from NFS land, restore natural grades, and revegetate disturbed areas at no cost to the federal government.

3.6.2 No Action

No changes in recreation opportunities or visual quality in and around the Camp's permitted area would occur.

3.6.3 Modified Master Plan

No changes in recreation opportunities and no changes to visual quality in and around the Camp's permitted area would occur because no new facilities would be built, and upgrading of the existing infrastructure would occur indoors or lie underground.

3.7 CULTURAL RESOURCES

3.7.1 Proposed Action

Requirements of the following cultural resource protection statutes were addressed in the evaluation of the proposed action.

Section 106 of the National Historic Preservation Act of 1966 (P.L. 89-665, 80 Stat. 915) requires Federal agencies to take into account the effect of a project on any district, site, building, structure, or object that is included in, or eligible for inclusion in, the National Register. Section 106 of the National Historic Preservation Act also requires Federal agencies to afford the Advisory Council on Historic Preservation a reasonable opportunity to comment.

The Archaeological Resources Protection Act of 1979 (P.L. 96-95, 93 Stat. 721) governs the discovery and protection of historic properties (prehistoric and historic) that are excavated or discovered on Federal lands. It affords lawful protection of archaeological resources and sites that are on public and Indian lands.

The Native American Graves Protection and Repatriation Act of 1990 (P.L. 101-601, 104 Stat. 3048) governs the discovery and protection of Native American human remains and objects that are excavated or discovered on Federal lands. It encourages avoidance of archaeological sites that contain burials or portions of sites that contain graves through "in situ" preservation, but may encompass other actions to preserve these remains and items.

Surveys were conducted for Native American religious or cultural sites, archaeological sites, and historic properties or areas that may be affected by this decision. A "no properties affected" determination was made by the Forest Archeologist and the State Historic Preservation Office concurred with this finding (see Appendix B).

The federal government also has trust responsibilities to tribes under a government-to-government relationship to ensure that Native American tribes' reserved rights are protected. Consultation with tribes helps ensure that these trust responsibilities are met. Potentially affected tribes were consulted to ensure tribal concerns were addressed (see Appendix B). No tribal concerns were identified for this project.

3.7.2 No Action

No impacts to cultural resources would occur.

3.7.3 Modified Master Plan

The potential for cultural resource impacts would be less than that associated with the preferred alternative because ground disturbance for a maintenance complex and manager's residence would not occur.

3.8 ENVIRONMENTAL JUSTICE

Executive Order 12898 requires consideration of whether projects would disproportionately affect minority or low-income populations. No local minority or low-income populations are evident in the project area. Therefore, none of the alternatives would result in adverse effects.

3.9 CUMULATIVE IMPACTS

Cumulative impacts are defined by CEQ as impacts on the environment which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions" (40 CFR 1508.7). The Forest Service has identified no other proposed actions to be undertaken in the zone of environment potentially affected by actions planned at Pine Canyon camp and within the same time frame as renovations and construction at the Camp. Therefore, no cumulative impacts would be expected to occur.

4.0 CONSULTATION AND COORDINATION

The Forest Service consulted the following individuals, Federal, State, and local agencies, tribes and non-Forest Service persons during the development of this EA.

FEDERAL, STATE, AND LOCAL AGENCIES:

Chiricahua National Monument, National Park Service
U.S. Fish and Wildlife Service
Arizona State Historic Preservation Office

TRIBES:

Ak-Chin Indian Community
Ak-Chin Him Dak Museum
Ft. McDowell Mojave-Apache Indian Community
Ft. Sill Apache Tribe
Gila River Indian Community
Mescalero Apache Tribe
Pasqua Yaqui Tribe
Salt River Pima-Maricopa Indian Community
San Carlos Apache Tribe
Tohono O'odham Nation
White Mountain Apache Tribe
Yavapai-Apache Nation
Pueblo of Zuni

COMMENTS ON THE SCOPE OF THE NEPA REVIEW RECEIVED FROM:

Sky Island Alliance
Chiricahua National Monument

5.0 LIST OF PREPARERS

U.S. Forest Service, Coronado National Forest

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Pete Gordon	Assistant Forest Fire Management Officer

6.0 REFERENCES

Land and Resource Management Plan, Coronado National Forest, 1986, as amended

APPENDIX A:

**CONSULTATION IN ACCORDANCE WITH THE
NATIONAL HISTORIC PRESERVATION ACT
AND WITH NATIVE AMERICAN TRIBES**

A copy of the cultural resources report, the Inventory Standards and Accounting form, and the letter to the tribes, with mailing list, are attached.