



**National Park Service  
U.S. Department of the Interior**

**Whiskeytown National Recreation Area  
Regions 8, 9, 10 and 12**

**FINDING OF NO SIGNIFICANT IMPACT  
Whiskeytown Environmental School Rebuild**

Recommendation:

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Josh Hoines  
Superintendent, Whiskeytown National Recreation Area

Approved:

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Randy Lavasseur  
Acting Regional Director, National Park Service, Interior Regions 8, 9, 10 and 12

# 1. Introduction

In compliance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code [USC] 4321 et sq); the Department of the Interior NEPA regulations (43 CFR Part 46); and NPS Director's Order 12: Conservation Planning, Environmental Impact Analysis and Decision-making and its accompanying NPS NEPA Handbook, the National Park Service (NPS) prepared an Environmental Assessment (EA) for Whiskeytown Environmental School Rebuild.

The Department of Interior (DOI) published an interim final rule, NEPA Implementing Regulations, on July 3, 2025, and a final rule on February 24, 2026, rescinding and making necessary targeted updates to its remaining regulations implementing NEPA, as well as a DOI NEPA Handbook at 516 Departmental Manual 1. The park published an EA on January 22, 2026, relying upon preexisting NEPA procedures that predate July 3, 2025, because the plan's NEPA review was sufficiently advanced at the time DOI issued the NEPA rule. Nonetheless, NPS will rely upon existing procedures to issue this FONSI, completing the NEPA review for the plan. The EA and FONSI are consistent with DOI's Final NEPA Implementing Regulations and DOI NEPA Handbook.

## 2. Selected Alternative and Rationale for the Decision

Based on the analysis presented in the EA, the NPS selected the Preferred Alternative. The NPS will restore capacity to the Whiskeytown Environmental School (WES) by rebuilding facilities at the current WES site, expanding program capacity, and restoring overnight use. The alternative includes the Paige Boulder bridge removal and footbridge construction, improvements to pedestrian and vehicle circulation, renovation of Hatcher Hall and the existing administrative building, and construction of four to six double cabins, one quad cabin, one field instructor cabin, an administration building, teacher accommodations, new pavilions, new fire road, accessibility improvements, and a new arbor for large gatherings. Also included in this alternative is renovation of the existing pond, parking expansion, as well as upgrades to utilities, including water, power, and sewer lines. The alternative would allow for the maximum of 192 occupants, increasing campus capacity to exceed pre-Carr fire capacity resulting in more students served.

### Rationale

The Selected Alternative was chosen because it best meets the project's purpose and need described in the EA (pages 4-5), including to restore week-long residential education programs at WES by removing dilapidated and unsafe buildings damaged by the Carr Fire and creating a renovated campus that would serve the community through interpretation, research, and partnerships. The restoration of residential educational programs is appropriately centered at the WES site due to its existing infrastructure, established history of supporting such programs, and the lack of viable alternative locations within WHIS capable of accommodating residential education.

The need for the project is to provide a home for residential environmental education programs for K-12 students from the greater local communities. This facility serves as a vital community hub, offering space for educational programs, tribal and community meetings, workshops, training, and research. Along with supporting continued access to recreational activities such as fishing, hiking, biking, and swimming, it can also create opportunities to generate resources to fund facility and site maintenance.

The program aligns with the purpose of the NPS and WHIS, which encourages public recreation and scientific discovery. Restoring the WES is necessary to uphold WHIS's mission to preserve scenic, scientific, and historic values for the enjoyment of present and future generations (Public Law 89-336).

Whiskeytown National Recreation Area has a long-standing partnership with the Shasta County Office of Education (SCOE) at the Whiskeytown Environmental School, making environmental education a core part of WHIS's history. WES is one of the longest-running outdoor education centers in the National Park System. The continuation of this outdoor education program is a high priority for partner organizations, including NPS, SCOE, and WESC. This longstanding partnership—integrating interpretation, research, and interagency collaboration—provides exceptional opportunities for immersive learning and fosters a deeper understanding and appreciation of the area's natural and cultural resources.

### **3. Mitigation Measures**

The National Park Service has the authority to implement the mitigation measures presented in Appendix D of this FONSI under the Organic Act, the National Historic Preservation Act, NPS Management Policies 2006, and other federal and state applicable requirements. The Selected Alternative incorporates the mitigation measures listed in Appendix D of this FONSI and thus results in the finding of no significant impacts.

### **4. Other Alternatives Considered**

The Selected Alternative (Action Alternative) was chosen after a process that evaluated the feasibility of two alternatives, a No Action Alternative and an Action Alternative. The No Action Alternative is described on page nine of the EA. The No Action Alternative continued current management of the WES site, which precludes residential programs, into the future. This alternative represents current conditions and serves as a baseline for comparison with the action alternative. There would be no change to existing programs, facilities, program capacity, or parking. Under the No Action Alternative, the WES site would continue to be used for day school use, with no overnight outdoor educational opportunities.

### **5. Public Involvement/Agency Consultation**

Whiskeytown National Recreation Area in conjunction with the Philanthropic Partner, Whiskeytown Environmental School Community (WES Community or WESC), has been active in civic engagement since the 2018 Carr Fire, advocating for its restoration and rebuilding

essential infrastructure lost or damaged in the blaze. Shortly after the disaster, WES Community initiated outreach at the Shasta County Mini Maker Fair and has continued to involve the community through numerous local and regional events. The Redbud Recovery Project, the 50<sup>th</sup> Anniversary of Whiskeytown Environmental School (WES), the feasibility study interviews, focus groups, and presentations at various clubs and radio interviews have contributed to gathering public support. Since May 2022, “Grow Back Stronger”, the official fundraising campaign to rebuild the school, a substantial number of outreach events and contacts have been made. Together the park and WES Community have utilized various public engagements and media outlets—from local radio shows and news programs and collaboration with the National Park Foundation—to communicate about this project.

WES Community also produces a bi-monthly newsletter, maintains an active presence on Facebook and Instagram, and hosts a website. These persistent engagement activities have led to significant community support, including several substantial pledges, highlighting the community's collective effort to rebuild WES for future generations. Over the seven years since the Carr Fire, WHIS and WES Community has engaged the public through over 50 events, reaching more than 80,000 people. These efforts have generated tangible grassroots support for the rebuild project.

The EA was available for a formal 30-day public comment period beginning with a press release and notice of the availability of the EA issued on January 22, 2026. Information was posted on the PEPC website and notice of release was sent out via press release, emails to stakeholders, and social media. The public comment period closed on February 21, 2026, and 11 correspondences were received that are discussed in Appendix B of this FONSI.

Project information was distributed through the following:

- Social media posts
- A news release sent via email to various stakeholders, agencies, and media groups.
- A public meeting was held from 12 to 2 pm on Saturday, February 7, 2026, at Hatcher Hall, located on the campus of Whiskeytown Environmental School.

#### ***Agency Outreach***

- U.S. Fish and Wildlife Service – Yreka Fish and Wildlife Office
- National Oceanic and Atmospheric Administration, National Marine Fisheries Service, West Coast Region – California Central Valley Area Office
- California Office of Historic Preservation
- California Native American Heritage Commission

#### ***Tribal Outreach & Coordination***

- Greenville Rancheria
- Nor-Rel-Muk Wintu Nation
- Quartz Valley Indian Community
- Redding Rancheria

- Shasta Indian Nation
- Winnemem Wintu Tribe
- Wintu Tribe of Northern California

## **6. Finding No Significant Impact**

### **6.1 Potentially Affected Environment**

The following impact topics were analyzed in the EA and may be affected by the proposed action: water quality, floodplains, visitor use and experience, threatened and endangered species, wildlife, and cultural resources.

### **6.2. Degree of Effects of the Action**

The NPS considered the following actual or potential project effects in evaluating the degree of effects (40 CFR 1501.3(b)(2)) for the selected alternative. No significant impacts to resources were identified that would require analysis in an Environmental Impact Statement (EIS).

Whether taken individually or as a whole, the impacts of the selected alternative, including direct, indirect and cumulative effects, do not reach the level of a significant effect because adverse impacts associated with implementation will be minimal or temporary, lasting only as long as actions are being executed. The selected action will result in substantial long-term beneficial impacts. Mitigation measures included in Appendix D of this FONSI will minimize potential adverse impacts.

#### **Both short- and long-term effects and beneficial and adverse effects**

There is a potential for minor to moderate adverse impacts resulting from construction adjacent to Clear Creek including construction activities that would clear vegetation and disturb soils. The area of disturbance is approximately 1.5 acres. These actions could adversely impact the section of Lower Clear Creek directly adjacent to WES by worsening water quality conditions through erosion runoff and increasing turbidity. The water quality mitigation measures are designed to contain erosive soils, resulting in no permanent change in water quality. Mitigation measures include erosion control measures such as silt fences, erosion control mats, and water and check bars where necessary and are included in Appendix D of this FONSI.

Impacts to listed and sensitive species are adverse minor to moderate and short term.

Sedimentation could result in potential short-term minor to moderate negative impact to fish species. With mitigation measures in place in and around WES, adverse impacts will be reduced to minor to moderate levels and essential habitat for these species will be protected.

Over the long-term, there would be minor to moderate beneficial impacts to wildlife from the Selected Alternative including improvements to both natural and created habitats that, taken together, will enhance wildlife sustainability. Remodeling buildings would keep wildlife out, preventing human/wildlife use conflicts. Removing the bridge from Paige Boulder Creek would return the stream to its natural condition, facilitating habitat for aquatic and amphibious species

and improve fish passage. Reconstructing the pond would provide habitat for northwestern pond turtles and other native amphibians such as pacific chorus frogs and aquatic garter snakes. While the Selected Alternative would produce direct short term adverse impacts to wildlife due to construction, these impacts can be largely mitigated to negligible or minor levels by following mitigations in Appendix D of this FONSI.

Direct impacts to cultural resources will be avoided, and indirect use impacts such as trampling and collecting artifacts within the WES facility and associated trail areas could potentially increase due to the increased use. An archeological site located within the study area is determined eligible for the National Register of Historic Places (NRHP) (CA OHP # NPS890804A). The use of heavy equipment for construction of new facilities may also result in adverse impacts to archeological resources. Mitigations are proposed to reduce or eliminate adverse effects to cultural resources (Appendix D). New facility construction and development under the Selected Alternative would avoid direct adverse impacts on historic properties. Ground disturbing activities would be monitored, and mitigations are in place in the case of unintended discovery of archeological resources (Appendix D).

### **Effects on public health and safety**

It is NPS policy to preserve floodplain functions and values and minimize potentially hazardous conditions associated with flooding, including threats to human health and safety, risk to capital investment, and impacts on natural and beneficial floodplain values. If a proposed action is found to be in, or possibly affecting a floodplain, and relocating the action to a non-floodplain site is not considered a viable alternative, then a formal Floodplain Statement of Findings (FSOF) must be prepared unless the action is considered excepted. The FSOF must (a) describe the rationale for selection of a floodplain site, (b) disclose the amount of risk associated with the chosen site (with respect to human life, health, and safety, resource protection, and capital investment), and (c) explain strategies for mitigation of flood risk. The FSOF was available for public review and comments in coordination with the National Environmental Policy Act (NEPA) and other compliance procedures.

The impacts to floodplains are expected to be direct, long term, adverse, and minor to moderate. The FSOF prepared for the Selected Alternative (Appendix D of this FONSI) determined that implementing the proposed action at WES does not significantly impact floodplain processes and there is minimal risk to infrastructure or human health and safety. The hydraulic analysis confirmed that the proposed removal of the Paige-Boulder Creek bridge results in a reduction in flood hazard, specifically, the removal of the bridge improves the containment of 500-year flood flows within the channel, reducing the potential for flooding outside the defined creek banks. Additionally, flood velocities are substantially reduced in the overbank areas and vegetated zones, which may mitigate potential erosion and sediment transport. Despite these improvements, the 100-year flood still extends into the WES parking area, which could require further design considerations to mitigate flood impacts on the proposed development.

Primary buildings serving WES, including Hatcher Hall, kitchen facilities, sleeping cabins, and administration buildings are outside both the 100 and 500-year floodplains. Thus, the immediate human health and safety risk is minimal. Since the majority of structures at WES are above the 500-year flood level, people would generally not be forced to evacuate during a flood; although, evacuation of the campus would occur if an uncontrolled release from Whiskeytown Dam is expected due to early warnings whenever such an event does occur. The primary egress into and out of WES is the bridge over Clear Creek which is above the 500-year flow. Vehicles would primarily maintain access to this bridge via the new road southwest of the new cabins. Vehicles would have to cross one stretch of potentially inundated road near the south end of WES. Regrading of the road in this area will decrease flood depths and potentially eliminate some inundated areas. Using the existing topography flow depths at a 100-year flow are about 1 foot or less and velocities less than 0.5 ft/s. However, at a 500-year flow with existing topography, flow depths are 3 to 4 feet and peak velocities approach 6 ft/s. Under this scenario, vehicles would likely not cross, and people would need to walk around the inundated portion of the road and cross the Clear Creek bridge on foot.

### **Economic effects**

The Selected Alternative will result in minor short term beneficial impacts to the local economy from the construction and associated expenditures in the local economy. Economic effects at the state and federal levels will be negligible.

### **Effects on the quality of life of the American people**

There will be long term moderate beneficial impacts to the American people by the resumption of the overnight programs at WES. The project would allow for an expansion of the program, providing the region's children with opportunities for a safe educational experience. During construction there would be short term minor adverse impacts to visitor use and experience because full campus closure would be necessary for construction. The long-term beneficial impacts to visitor use and experience from resumption of the full WES program outweigh the short-term impacts. The effect is mainly at the local level with school children throughout Shasta County and surrounding counties benefiting from the program.

### **Effects That Would Violate Federal, State, Tribal, or Local Law Protecting the Environment**

The Selected Alternative does not threaten or violate applicable federal, state, or local environmental laws or requirements imposed for the protection of the environment. The Selected Alternative will not violate a provision or requirement identified under legislation addressing Whiskeytown National Recreation Area, the Organic Act, or other legislation.

## **7. Conclusion**

As described above, the Selected Alternative does not constitute an action meeting the criteria that normally require preparation of an environmental impact statement (EIS). This finding is

based on consideration of the Council on Environmental Quality and NPS guidance on the criteria for significance, regarding the potentially affected environment and degrees of effects of the impacts described in the EA (which is incorporated by reference).

## Appendix A: Errata Indicating Text Changes to EA

This Errata contains corrections and minor revisions to the Environmental Assessment. Page numbers and section/sentence locations referenced pertain to the WES EA for public review from January 2026. The edits and corrections in this Errata do not result in any substantial modification being incorporated into the Selected Action, and it has been determined that the revisions do not require additional environmental analysis. The Errata, when combined with the EA, comprises the only amendments deemed necessary for the purpose of completing compliance and documentation for the project. Existing text to remain in the Environmental Assessment is found in *italics*, additions to the text are underlined, and deleted text is shown in ~~strikeout~~.

Chapter 1, Page 2: *While the primary focus of WHIS is water-based recreation, the park also contains rugged canyons, forests, streams, and waterfalls (Deur ~~Douglas~~ et al., 2020). The land surrounding Whiskeytown Lake provides recreational opportunities including hiking, mountain biking, and horseback riding. WHIS is characterized by steep and rugged terrain, winter rains, long and dry summers, which coupled with frequent wildfires create diverse habitats, from old-growth forests to oak woodlands, chaparral, and riparian bottomlands (Deur ~~Douglas~~ et al., 2020, ~~and NPS, 2022~~). Visitors and locals alike enjoy the lake, wildlife habitat, recreational opportunities, and the power-generating properties of the Central Valley Water project (Deur ~~Douglas~~ et al., 2020).*

*The Wintu People inhabited the WES site for thousands of years prior to Euro-American contact (Deur ~~Douglas~~ et al., 2020).*

*The number of students served since 1971 is estimated at over 152,000 ~~138,700~~ students (SCOE, 2024) (See Appendix C).*

<i>Year</i>	<i>5th &amp; 6th Grade</i>	<i>Clear Creek Field Lab K-6 (spring fall)</i>	<i>Clear Creek Field Lab K-6 (fall spring)</i>	<i>Clear Creek Field Labs K-4</i>	<i>Spring and Summer Camps</i>	<i>Totals per year</i>
<i>1970-1997 (27 years x 2300 per year*)</i>	<u>62,100</u>					<u>62,100</u>
<i>1997-98</i>	<u>2,519</u>					<u>2,519</u>
<i>1998-99</i>	<u>2,521</u>					<u>2,521</u>
<i>1999-00</i>	<u>2,444</u>					<u>2,444</u>
<i>2000-01</i>	<u>2,884</u>			<u>441</u>		<u>2,884</u> <u>3,325</u>
<i>2001-02</i>	<u>2,452</u>			<u>1,115</u>		<u>2,452</u> <u>3,567</u>
<i>2002-03</i>	<u>2,579</u>			<u>1,551</u>		<u>2,579</u> <u>4,130</u>
<i>2003-04</i>	<u>2,420</u>			<u>1,726</u>		<u>2,420</u> <u>4,176</u>
<i>2004-05</i>	<u>2,245</u>			<u>2,209</u>		<u>4,454</u>
<i>2005-06</i>	<u>2,080</u>			<u>2,193</u>		<u>4,273</u>
<i>2006-07</i>	<u>3,325</u>			<u>1,597</u>		<u>4,922</u>
<i>2007-08</i>	<u>3,026</u>					<u>3,026</u>
<i>2008--09</i>	<u>2,239</u>			<u>1,756</u>		<u>1,756</u> <u>3,995</u>
<i>2009-10</i>	<u>2,229</u>			<u>925</u>		<u>3,154</u>
<i>2010-11</i>	<u>2,239</u>			<u>1,624</u>		<u>1,624</u> <u>3,863</u>
<i>2011-12</i>	<u>1,749</u>			<u>1,556</u>	<u>165</u>	<u>3,470</u>
<i>2012-13</i>	<u>1,545</u>			<u>1,580</u>		<u>3,125</u>
<i>2013-14*</i>	<u>1,540</u>			<u>1,550</u>		<u>3,090</u>
<i>2014-15</i>	<u>2,060</u>			<u>2,460</u>	<u>300</u>	<u>4,820</u>
<i>2015-16</i>	<u>1,830</u>			<u>2,000</u>	<u>300</u>	<u>4,130</u>
<i>2016-17</i>	<u>1,927</u>			<u>2,000</u>		<u>3,927</u>
<i>2017-18</i>	<u>1,950</u>			<u>2,296</u>		<u>4,246</u>
<i>2019 Lassen Pines**</i>	<u>1,866</u>					<u>1,866</u>
<i>2021-2022</i>		<u>561</u>	<u>1,230</u>		<u>721</u>	<u>2,512</u>
<i>2022-2023</i>		<u>772</u>	<u>1,588</u>		<u>1,553</u> <u>213</u>	<u>3,913</u> <u>2,573</u>
<i>2023-2024</i>		<u>497</u>	<u>2,038</u>		<u>381</u>	<u>2,535</u> <u>2,916</u>
<i>2024-2025</i>		<u>637</u>	<u>2,784</u>			<u>3,421</u>
<i>Estimated Totals</i>	<u>107,291</u> <u>111,769</u>	<u>1,830</u> <u>2,467</u>	<u>2,818</u> <u>7,640</u>	<u>23,746</u> <u>28,585</u>	<u>3,039</u> <u>2,080</u>	<u>138,724</u> <u>152,541</u>
* Estimated						
** Camp held at Lassen Pines Camp due to Carr Fire						

Appendix D, Page D-7 of the EA: *Prior to commencing site-specific activities associated with construction, a botanical survey of the site will be completed. The survey will include areas that will be directly and indirectly impacted. The survey will include mapping of plant communities including sensitive plant species and invasive species. The vegetation surveys will be timed to cover expected species-specific blooming periods to ensure that detection probability of sensitive species is maximized.*

Appendix D, Page D-7 of the EA: *Tree trimming will be completed using accepted arborist techniques that minimize long-term impacts to trees. The large oak trees that occur on the northern side of the buildable zone shall be protected from disturbance by placing temporary exclusionary fencing at the drip line of the trees. An arborist shall be consulted and potentially monitor construction activities to avoid any root damage through soil compaction and other disturbance.*

Appendix D, Page D-8 of the EA: *The wetlands located near the construction area are freshwater forested/shrub wetlands with sections of riverine ~~estuarine~~ wetland, such as near Clear Creek Bridge.*

Appendix F, Page F-5 of the EA: *WES is operated by the Shasta County Office of Education (SCOE) in cooperation with the NPS ~~and the non-profit Whiskeytown Environmental School Community (WESC).~~*

Appendix F, Page F-6 of the EA: *The old bridge over PBC will be replaced with a modern footbridge as part of a future project. The hydraulic effects of removing the old vehicular bridge are included in the modeling results presented herein, but the proposed footbridge is not evaluated as part of this FSOF. After engineering designs are complete, if the replacement footbridge is determined within the regulatory floodplain a separate FSOF will be developed.*

# **Appendix B:**

## **Response to Substantive Public Comments**

### ***PUBLIC ENGAGEMENT SUMMARY***

The EA was available for a formal 30-day public comment period beginning with a press release and notice of the availability of the EA issued on January 22, 2026. Information was posted on the PEPC website and notice of release was sent out via press release, emails to stakeholders, and social media. The public comment period closed on February 21, 2026, and 11 correspondences were received that are discussed in this Appendix.

Public notices were distributed through the following sources:

- Social media posts.
- A news release sent via email to various stakeholders, agencies, and media groups.

In addition, the public was invited to a public meeting from 12 to 2 pm on Saturday, February 7, 2026, at Hatcher Hall, located on the campus of Whiskeytown Environmental School.

### ***DEFINITION OF TERMS***

**Correspondence:** Correspondence is the entire document received from a commenter and includes letters, emails, comments entered directly into the PEPC database, and other written comments provided either at the public meetings or in person at the park.

**Comment:** A comment is a portion of text within a correspondence that addresses a single subject such as “paleontological resources.” The comment could also question the accuracy of the information provided in the newsletter, question the adequacy of any background information, or present issues other than those contained in the EA.

### ***COMMENT ANALYSIS METHODOLOGY***

Comment analysis is a process used to compile and correlate similar comments into a usable format for decision makers and the project’s interdisciplinary planning team. Comment analysis assists the NPS in organizing, clarifying, and addressing information pursuant to NEPA regulations. It also aids in identifying the topics and issues to be evaluated and considered throughout the planning process. Main components of the process include:

§ employing a comment database for comment management

§ reading the comments

§ interpreting and analyzing the comments to identify issues and themes

§ preparing a comment summary report

The NPS PEPC database was used to manage the comments. The database stores the full text of correspondence and tallies the total number of correspondences and comments received. The database can sort and report comments by a particular topic or issue, and it can provide demographic information on the sources of each comment.

Comments were read and analyzed, including those of a technical nature, opinions, suggestions, and comments of a personal or philosophical nature. Although the analysis process attempts to capture the full range of public concerns, this report should be used with caution because comments from people who chose to respond do not necessarily represent the sentiments of the entire public.

***CONTENT ANALYSIS TABLE***

The following table was produced by the NPS PEPC database and modified as appropriate. The table provides information about the numbers and types of correspondence received, organized by code and by various demographics.

<b>Correspondence Type</b>	<b>Correspondence</b>	<b>Organization</b>	<b>State</b>
PEPC Web Form	The rebuilt seems like a great idea, however concrete is one of the least carbon friendly building materials. Perhaps there are alternative materials that will provide a better balance between fire resistance and environmental sustainability.	Unaffiliated Individual	VA
PEPC Web Form	Whiskeytown NRA and the NEED Camp experienced a huge debris torrent in 1997. Climate change will probably impact the area again with extreme flooding. Given the tragic loss of life caused by flooding in Texas during the summer of 2026 including twenty-seven children and counselors in the disaster in Kerr County, which was caused by slow-moving thunderstorms perhaps locate student cabins back to the original sites which is in higher ground. Safety above all else.	Unaffiliated Individual	CA

<p>PEPC Web Form</p>	<p>Re: Pond Water plan.</p> <p>"Historically, the water supply for the pond was from nearby Paige-Boulder creek. The intake structure at the creek and the outlet into the pond, connected by a gravity-flow pipeline, have been abandoned and can no longer be found on-site."</p> <p>If Paige-Boulder creek offers a potential gravity flow into (and out of) the pond, why not construct it? This seems like a no-brainer given the expense and maintenance of the mechanical filtration system. The naturally clean water will provide better habitat for riparian species and mitigate the need for chemical treatment and its ongoing maintenance.</p> <p>Alternatively, although the permitting process might be onerous, using Clear Creek water seems second best. The one-time expense of permitting and construction are still better than filtered drinking water.</p>	<p>Unaffiliated Individual</p>	<p>CA</p>
<p>PEPC Web Form</p>	<p>Whiskeytown Environmental School is an amazing program that deserves every effort to reopen. The value of this program is infinite</p>	<p>Unaffiliated Individual</p>	<p>CA</p>
<p>PEPC Web Form</p>	<p>I would suggest that building construction include state of the art solar panels. Also, an educational demonstration windmill with exhibits should be constructed to illustrate the benefits and costs of wind energy. Lastly an educational demonstration dam with exhibits should be constructed that illustrates the benefits and costs associated with hydropower. Also, a fish cleaning station with exhibits should be constructed to educate students about recreational and commercial fishing.</p>	<p>Unaffiliated Individual</p>	<p>FL</p>

<p>PEPC Web Form</p>	<p>Thank you for providing the opportunity to comment on this valuable project which I fully support. It will be beneficial to have WES fully operating again. Recognizing that NPS's primary purpose is "preserving unimpaired the natural and cultural resources and values of the National Park System" (www.nps.gov), I'm offering the following comments on the Mitigation Monitoring and Reporting (MMR) requirements for your consideration:</p> <p>Comment 1: Other than indicating that WES will not operate for two years, the project description does not offer a construction schedule. However, the mitigation measures require several exclusion windows to protect species. For example, BIO-4 considers Central Valley chinook (Mar-Oct) and steelhead (Dec-April). Other mitigation measures protect terrestrial wildlife. The project will require careful phasing and scheduling to avoid impacts.</p> <p>Comment 2: Require daily tailgates to refresh worker training and discuss current conditions, e.g., new exclusion fencing or wildlife species sightings.</p> <p>Comment 3: BIO-6 requires vegetation surveys. These should be conducted during the appropriate (and weather-dependent) flowering times for various species from spring to summer.</p> <p>Comment 4: Require a written revegetation and restoration plan. Restoration, to some, could mean riprap. Likely, that is not what NPS intends.</p> <p>Comment 5: The impact with the greatest potential for long-term effects on biological resources and NPS management activities and costs is the introduction of exotic invasive species. BIO-7 and SW-1 should reference each other. Avoiding the introduction of exotic invasive species is a standard best management practice or mitigation measure. Given the sensitive location of WES, NPS might want to</p>	<p>Unaffiliated Individual</p>	<p>CA</p>
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	<p>emphasize this compliance requirement to the contractor.</p> <p>Comment 6: BIO-7 includes non-applicable language, such as reference to estuarine wetland habitat. Please clarify whether "riverine wetlands" (as discussed under Issues, Wetlands) are the same as "freshwater forested/shrub wetlands" (BIO-7) and, in the absence of a published wetland delineation, disclose whether the project stays under the 0.25 ac limit in DO 77-1. For example, tabulate wetland types and acreages.</p>		
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<p>PEPC Web Form</p>	<p>Thank you for preparing the Environmental Assessment and for inviting public feedback. I appreciate the depth of detail and the thoughtful consideration given to wildlife, water resources, and cultural resources throughout the document.</p> <p>During a recent tour of the property, I noted several large oak trees on or near the proposed development areas. While I understand it is the intent of the National Park Service to preserve these trees, I did not find many specific references to them in the EA beyond page 14 ("Cabins would be located out of the drip line of oaks"). Because oaks are a keystone species that provide shelter, food, and shade for more than 100 other species, it may be helpful for the final document to more explicitly describe how these mature oaks will be protected during grading, construction, and site layout. Even a brief clarification would strengthen the reader's understanding of how these important trees are being considered.</p> <p>I also had a few suggestions for improving clarity in Appendix F. On page 113, the statement "The old bridge over PBC will be replaced with a modern footbridge as part of a separate project and is not evaluated as part of this FSOF" was somewhat confusing. Because the EA elsewhere describes the removal of the old bridge as a key step in reducing flood risk, mentioning a future replacement project that is outside the scope of this EA may introduce unnecessary ambiguity. It may be worth clarifying whether this reference is needed in the appendix.</p> <p>Thank you again for the opportunity to comment and for the careful work that has gone into this plan. The Whiskeytown Environmental School is an important educational and ecological resource for our region, and I appreciate the thoughtful approach reflected in the EA.</p>	<p>Unaffiliated Individual</p>	<p>CA</p>
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<p>PEPC Web Form</p>	<p>I have a B.Sc. in Wildlife Biology (Univ. of MT, 1975), as well as A.S. degrees in Nursing (RN) &amp; Dental Hygiene (RDH); was a Biological Technician at Bowdoin NWR (near Malta, MT) for a season, then- -much later- -was a technical writer/editor for the Eagle Lake office of the BLM (Susanville, CA) for two years (2006 &amp; 2007) where I worked on Resource Management Plans for that office, and for the Alturas and Surprise Valley (Cedarville) offices as well.</p> <p>Both my daughter's families live in Missoula, and two of my grandsons have benefited substantially from week-long residential programs similar to those provided by the Whiskeytown Environmental School before the fire. 'Camping out' in beautiful, natural surroundings with other kids; and under the leadership of enthusiastic, qualified Naturalists- -in the absence of television and cell phones- -leads children to understand and appreciate the wonders of nature. It begins to dawn on most just how 'awesome' and vital a clean, healthy and properly functioning landscape is . . . and not just for humanity, but for all life on earth. Funds spent to do a proper job of rebuilding these cabins, is money well-spent.</p>	<p>Unaffiliated Individual</p>	<p>CA</p>
<p>PEPC Web Form</p>	<p>I was Facility Manager at Whiskeytown from 1989 until I retired in 2008. Dave Larabee replaced me. I worked on a plan to replace the cabins a long time ago. Heidi Hatcher and I worked together before she passed. She had envisioned cabins to be built in clusters of four, rather than linear. cabins with restrooms in each would require more maintenance than a bath house. She also wanted to build them using environmentally friendly materials such as straw bale walls as an educational tool, but this would be difficult to do. I am glad to hear that something is finally happening t at WES or N.E.E.D camp as we referred to it. Long time coming.</p>	<p>Unaffiliated Individual</p>	<p>CA</p>

<p>Letter</p>	<p>February 18, 2026          Josh Hoines, Superintendent          Whiskeytown National Recreation Area          P.O. Box 188          14412 J.F. Kennedy Memorial Drive          Whiskeytown, CA 96095</p> <p>Re: Support for the Whiskeytown Environmental School Rebuild Environmental Assessment</p> <p>Dear Superintendent, Hoines,          I am writing to show my strong support, following the Shasta County Board of Supervisor’s Letter of Support dated October 21, 2025, enclosed hereto, for the Whiskeytown Environmental School (WES) Community’s philanthropic efforts to fund the WES Rebuild and now for the Environmental Assessment process that will guide its successful implementation. I fully support the shared mission to rebuild WES and to continue providing meaningful outdoor education experiences for our region’s youth.</p> <p>For more than five decades, WES has stood as a cornerstone of Shasta County’s educational and cultural landscape, introducing generations of students to the natural beauty of our area and the importance of environmental stewardship. Beyond classroom learning, WES helps young people find a sense of belonging and purpose, encouraging them to see themselves as future citizens, caretakers, and stewards of our public lands.</p> <p>The Environmental Assessment is a critical step in ensuring that the WES Rebuild meets modern safety, health, accessibility, and environmental standards while modeling climate and wildfire resilience for decades to come. This process will strengthen student safety and site security and enable the expansion of educational programming from daytime only to week-long overnight</p>	<p>Shasta County          Board of          Supervisors</p>	<p>CA</p>
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	<p>experiences, benefits that will serve youth across Shasta County and the broader North State.</p> <p>Importantly, WES’s impact extends beyond county lines. By growing new generations of park stewards, teaching science and scientific inquiry, and deepening students’ connection to the natural world, WES contributes to regional conservation and public lands stewardship, benefits that reach communities throughout Northern California and beyond. The school’s legacy of learning, engagement, and service will continue to enrich our community for generations.</p> <p>I appreciate the leadership of the National Park Service and the collaborative work with local education partners and the WES Community. I commend your efforts to advance the Environmental Assessment and remain supportive of the plans, agreements, and work programs that will ensure WES’s successful rebuild and long-term operation.</p> <p>Thank you for your commitment to WES and to the youth of our region. Please consider this letter an affirmation of my support and encouragement for the important work ahead.</p> <p>Sincerely,</p> <p>Allen Long Supervisor, District 2 Shasta County Board of Supervisors encl: Copy of Shasta County Board of Supervisors Letter of Support for Whiskeytown Environmental School Community</p>		
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<p>Letter</p>	<p>February 20, 2026</p> <p>Superintendent Josh Hoines P.O. Box 188 Whiskeytown, CA 96095</p> <p>Dear Superintendent Hoines,</p> <p>Thank you for the opportunity to comment on the Environmental Assessment for the Whiskeytown Environmental School Rebuild Project. WES Community's comments are as follows:</p> <p>Page 2 - the citation for the "Douglas et al., 2020" report mentioned twice in paragraphs 1 and 3 is incorrect. The author's surname is Deur." Deur et al., 2020" would be the correct citation.</p> <p>Page 2 - the number of students cited in paragraph four that have attended WES is inaccurate. The table in Appendix C-2 contains erroneous information and does not contain complete data. Please find the attached corrections to that table to this letter. I have added data for 2024-2025 to complete the table. I obtained this new information from Project Share staff, Shasta County Office of Education.</p> <p>Page D-3 - Please add a statement for mitigations during construction that will be used to protect the large oak trees that occur on the northeastern side of the meadow above the proposed location of the Arbor. At least one student cabin, a fire road and utilities are proposed in the vicinity of these large, old trees. Temporary fencing should be erected at the drip line of these trees to prevent inadvertent compaction of soil beneath them. An arborist should be consulted to create a list of best practices to prevent damage to the root zone during construction. Please include that list in this document.</p> <p>Page F-6- Section 1.3 Proposed Action. Correction of fact: WES is operated by the Shasta</p>	<p>Whiskeytown Environmental School Community</p>	<p>CA</p>
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	<p>County Office of Education with the NPS. Whiskeytown Environmental School Community (WESC) does not operate WES as implied in this sentence. We are an independent 501(3) (c) apart from the Shasta County Office of Education. We are an official Philanthropic Partner of the National Park Service that is helping raise funds to rebuild the school.</p> <p>We request that these corrections be made to the final document.</p> <p>With appreciation,</p> <p>Melinda Kashuba, Ph.D President Whiskeytown Environmental School Community</p>		
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The NPS has provided responses to the comments in the section below.

## ***COMMENT SUMMARY AND RESPONSE***

1. **Concern Statement:** A commenter expressed concern that concrete is one of the least carbon friendly building materials. Perhaps there are alternative materials that will provide a better balance between fire resistance and environmental sustainability.

**NPS Response:** Concrete has traditionally been used for its durability, ability to withstand heavy loads, and resistance to moisture and fire—factors that are particularly important structures in high hazard areas such as post-fire landscapes. As noted in the EA, Whiskeytown NRA will explore the potential use of more “survivable” materials for future construction as part of improving long-term resilience. In considering materials, the NPS must balance sustainability, cost, availability, and performance requirements, including load capacity and safety. The park will continue to evaluate feasible alternatives during project design and will incorporate lower impact materials where they meet engineering, safety, and environmental requirements.

2. **Concern Statement:** A commenter expressed concern that climate change will probably result in future extreme flooding events in the area and suggested that student cabins be relocated back to their original, higher elevation sites to prioritize safety.

**NPS Response:** Any facility siting - including student cabins - must balance multiple factors such as topographic suitability, access, utilities, resource protection, and program needs. While relocating cabins to higher ground may appear beneficial from a flood risk perspective, the original sites also present constraints, including infrastructure limitations and increased fire risk. As summarized in the Floodplain Statement of Finding (Appendix F of the EA), the elevation of the proposed buildable area for the cabins is at a minimum of 2 feet above the inundation extent for a 500-yr flood event. This elevation, greater than a 500-year flood, represents the edge of where the cabins could first become wet. Flows and water depths would need to be several feet higher than that to present depths and velocities that would present a direct risk to students and staff within or near the cabins in the proposed buildable area. To produce a flood flow far greater than a 500-year flood, a phenomenal confluence of meteorological events would need to occur; a convergence that would be apparent in ongoing and forecasted conditions that would provide ample time to initiate and complete an evacuation of WES. In addition, moving the cabins to the back (west) edge of the same terrace where they are proposed would increase the fire risk to the cabins because of the decreased defensible space amongst the trees that line the west edge of the terrace. As the project moves into subsequent design phases of new cabins within the identified buildable zone, the NPS will continue to evaluate site specific flood risk, climate resilience, and safety considerations.

3. **Concern Statement:** A commenter asked why a gravity flow system from Paige–Boulder Creek is not being constructed if the creek offers the potential to supply and circulate water naturally into and out of the pond. The commenter stated that a natural gravity-fed system appears to be more cost effective than a mechanical filtration system and could improve riparian habitat while reducing the need for chemical treatment and

maintenance. The commenter also suggested using Clear Creek water as another alternative, noting that the one-time expense of permitting and construction would still be better than filtered drinking water.

**NPS Response:** As outlined in existing planning documents for the pond renovation, including the preliminary engineering reports, the current pond water supply and circulation systems are influenced by several constraints such as watershed hydrology, existing infrastructure, seasonal flow reliability, and water quality parameters. While Paige Boulder Creek is located near the project area, past hydrologic assessments - including the Paige Boulder Creek and WES Camp Flood Risk Evaluation - indicate that flow conditions in the creek are highly variable and subject to significant postfire sediment dynamics, debris flows, storm driven surges, and seasonal drying. These conditions limit its reliability as a consistent, passive, gravity-fed water source. Additionally, diverting water from natural waterways requires regulatory review and permitting to ensure compliance with federal and state water rights, instream flow protections, and habitat conservation requirements. At this time, no intact diversion structure exists, and constructing such a system would require additional environmental analyses due to potential impacts on sensitive aquatic species, riparian vegetation, and sediment transport. The mechanical circulation and filtration systems analyzed in the EA are designed to provide predictable water quality, oxygenation, and visitor safety while minimizing long-term ecological impacts. However, the NPS acknowledges the value of incorporating natural processes where feasible. During subsequent design phases, the park will continue to evaluate opportunities to integrate more sustainable water management approaches such as enhanced passive aeration, improved biological filtering, and reduced chemical inputs if they can meet water quality objectives, hydrologic reliability needs, and regulatory requirements.

4. **Concern Statement:** A commenter recommended incorporating state-of-the-art solar panels into new building construction. The commenter also suggested constructing an educational demonstration windmill with interpretive exhibits, an educational demonstration dam illustrating hydropower concepts, and a fish cleaning station with educational exhibits to support student learning about fishing and renewable energy.

**NPS Response:** Current planning efforts for facilities at Whiskeytown Environmental School focus on restoring essential program functions, meeting life safety requirements, and ensuring resilience to wildfire and flood impacts. At this stage, the inclusion of solar arrays or the construction of demonstration wind, hydropower, or fish processing educational features falls outside the scope of the EA. While these elements were not analyzed in the present environmental assessment, the NPS recognizes the educational value of renewable energy and natural resource interpretation. Opportunities for integrating sustainability features, interpretive exhibits, or small-scale demonstration components may be considered in future planning phases if they align with resource protection mandates, engineering feasibility, and educational program needs.

5. **Concern Statement:** A commenter noted that, aside from indicating WES will not operate for two years, the project description does not provide a detailed construction schedule. The commenter expressed concern that several mitigation measures require specific seasonal exclusion windows to protect sensitive species—for example, mitigation measures addressing Central Valley Chinook salmon (March–October) and steelhead (December–April)—as well as measures protecting terrestrial wildlife. The commenter stated that the project will require careful phasing and scheduling to avoid impacts.

**NPS Response:** As described in the Environmental Assessment, the proposed action includes a suite of mitigation measures and best management practices designed to avoid or minimize impacts to aquatic and terrestrial species during construction activities. These measures include seasonal work restrictions, survey requirements, and exclusion windows for special status species, as outlined in the mitigation section of the draft EA. A detailed construction schedule is not included at the EA stage because final sequencing must be developed once design documents, contractor availability, permit requirements, and regulatory conditions are confirmed. As is standard practice, the final construction schedule will be prepared during subsequent design and permitting phases to ensure full adherence to species protection constraints, including those for anadromous fish and terrestrial wildlife. The NPS agrees that careful phasing and scheduling will be essential to avoiding impacts, and a detailed construction timeline reflecting all mitigation measures will be developed and implemented prior to the initiation of onsite work.

6. **Concern Statement:** A commenter recommended requiring daily tailgate meetings during construction to refresh worker training and discuss current conditions, including updates to exclusion fencing or recent wildlife sightings.

**NPS Response:** The mitigation measures included in the EA require worker environmental awareness training prior to the start of construction and outline ongoing responsibilities for monitoring sensitive species and maintaining exclusion fencing. Daily tailgate meetings, while not specifically required in the EA, can be an effective tool for reinforcing training, communicating changing field conditions, and ensuring proper implementation of mitigation measures. During the development of final construction plans and contractor specifications, the NPS will determine the most effective approach to ensuring that worker training remains current and responsive to site conditions. This may include regular tailgate briefings, updated resource protection reminders, on-site resource monitors, or other communication methods appropriate to the timing, scope, and intensity of project work.

7. **Concern Statement:** A commenter noted that mitigation measure BIO-6 requires vegetation surveys and recommended that these surveys be conducted during the appropriate flowering periods for covered plant species, which may vary by species and weather conditions from spring through summer.

**NPS Response:** The intent of BIO6 is to ensure that surveys are conducted in a manner that allows qualified botanists to reliably identify special status species and sensitive plant communities prior to construction activities. Flowering period surveys are a widely accepted best management practice because many target species can only be positively identified during specific phenological windows, which may shift depending on annual rainfall, temperature, and other climate related variables. As part of project level implementation, the timing of vegetation surveys will be coordinated with species specific blooming periods and current field conditions to ensure that detection probability is maximized.

8. **Concern Statement:** A commenter recommended requiring a written revegetation and restoration plan, noting that the term “restoration” could be interpreted inconsistently - for example, some may assume it involves the use of riprap, which is likely not the NPS’s intention.

**NPS Response:** As outlined in the mitigation measures in Appendix D of the EA, including BIO series measures, the project includes requirements to protect native vegetation, avoid sensitive habitats, and implement site restoration following construction. These measures establish the need for revegetation and stabilization but do not prescribe detailed restoration methodologies. The intent of “restoration,” as used in the EA, is to return temporarily disturbed areas to conditions that support native ecological function and appearance. This typically includes replanting or seeding with appropriate native species, soil stabilization using natural materials, and removal of temporary construction features. The NPS does not intend the use of riprap for general postconstruction restoration except in areas where it is required for engineering or resource protection purposes and only after separate review.

9. **Concern Statement:** A commenter expressed that the introduction of exotic invasive species represents one of the most significant long-term risks to biological resources and NPS management costs. The commenter recommended that mitigation measures BIO-7 and SW-1 explicitly reference each other and stated that preventing the introduction of invasive species is a standard best management practice that should be emphasized to the contractor.

**NPS Response:** The mitigation measures presented in the EA include requirements related to biological resources (BIO series measures) and stormwater and sitework protections (SW series measures), as outlined in Appendix D of the EA. While BIO-7 and SW-1 each address resource protection responsibilities relevant to construction activities, the current EA does not explicitly cross reference these two measures. Avoiding the introduction or spread of exotic invasive species is a standard NPS best management practice and an important compliance requirement. The NPS agrees that this emphasis is especially important at WES given its sensitive watershed location, proximity to riparian habitat, and ongoing regional invasive species management efforts. Clear expectations for contractors, including requirements for equipment cleaning, soil and material management, and monitoring for invasive species, will be reinforced during

preconstruction briefings and through contractor specifications developed in later stages of the project.

10. **Concern Statement:** A commenter stated that BIO-7 contains non-applicable language, specifically references to estuarine wetland habitat, and requested clarification regarding whether “riverine wetlands” discussed in the Issues section refer to the same features as “freshwater forested/shrub wetlands” listed under BIO-7. The commenter also asked the NPS to disclose whether, in the absence of a published wetland delineation, the project remains below the 0.25-acre impact threshold identified in DO 77-1, and suggested tabulating wetland types and acreages.

**NPS Response:** As noted in the EA, the WES site contains riverine wetland features associated with Clear Creek and Paige Boulder Creek. These wetlands are classified as freshwater systems and do not include estuarine habitats. The reference to “estuarine wetland habitat” in BIO-7 reflects standard regional template language and is not applicable to the WES project area, therefore the language was corrected in the Errata appendix. “Riverine wetlands” in the Issues section and “freshwater forested/shrub wetlands” referenced in BIO7 both describe freshwater wetland systems, though they represent different subcategories within the U.S. Fish and Wildlife Service wetland classification system. Final site-specific classification will be confirmed during project level design and permitting. With respect to DO 771, the EA does not contain a formal wetland delineation or a tabulated breakdown of wetland acreages. Based on existing mapping and the siting of proposed improvements, the NPS anticipates that temporary or permanent impacts to wetlands - primarily riverine systems - will remain below the 0.25-acre threshold that would trigger higher level review.

11. **Concern Statement:** Multiple commenters were concerned about several large oak trees on or near proposed development areas. Commenters noted that at least one student cabin, a fire road, and utilities are planned near these mature trees. They recommended installing temporary fencing at the drip line to prevent soil compaction and consulting an arborist to provide a list of best practices for protecting the root zone, with that list included in the document. While they understand that the National Park Service intends to preserve these trees, they noted that the EA provides limited detail beyond the statement on page 14 that “Cabins would be located out of the drip line of oaks.” Because oaks are a keystone species that provide habitat, food, and shade for over 100 species, they suggested that the final EA more clearly describe how mature oaks will be protected during grading, construction, and site layout. They stated that even a brief clarification would help readers understand how these trees are being considered.

**NPS Response:** The NPS agrees that protecting these trees is critical to maintaining habitat quality at the WES site. Although the EA references oak tree protection primarily through siting decisions, such as locating cabins outside of oak drip lines, the park will use additional, well established protection measures during project implementation.

These measures will include consulting an arborist to provide a list of best practices for protecting the root zone, establishment of Critical Root Zones and Tree Protection Zones, installation of tree protection barriers, and adherence to ISA “Managing Trees During Construction” best management practices and ANSI A300 Part 5 standards. These standards require minimizing root disturbance, preventing soil compaction, maintaining favorable rootzone conditions, and avoiding alterations to water movement around protected trees. While these measures are part of the park’s normal construction compliance process, the NPS agrees that the final EA could benefit from a clearer explanation of how mature oaks will be protected during construction. In the Errata appendix, the NPS has added additional details summarizing these established practices to ensure that readers understand how oak preservation is integrated into grading, construction, and site layout.

12. **Concern Statement:** A commenter noted that Appendix F of the EA includes the statement: “The old bridge over PBC will be replaced with a modern footbridge as part of a separate project and is not evaluated as part of this FSOF.” The commenter found this confusing because elsewhere in the EA, removal of the existing bridge is described as an important action to reduce flood risk. Mentioning a future replacement project that lies outside the scope of this EA may introduce ambiguity, and the commenter suggested clarifying whether this reference is necessary in the appendix.

**NPS Response:** The preferred alternative in the EA includes both the removal of the old vehicle bridge and future construction of a new footbridge. The modeling in the Floodplain Statement of Findings (FSOF) assesses the hydraulic and flooding impacts of removing the existing bridge, in part because the existing bridge does constrict the channel and increases flood extent at high flows in the vicinity of PBC. However, the FSOF does not assess the proposed footbridge because engineering designs have not been developed. Thus, it is not possible to determine if the proposed footbridge is within the regulatory floodplain, nor can the hydraulic impacts of the proposed footbridge be assessed. Once designs are developed, if the footbridge is within the regulatory floodplain, NPS will develop a separate FSOF for that project. Additional language has been provided on page 6 of the final FSOF to provide further clarification (as described in Appendix A of this document).

13. **Concern Statement:** A commenter shared background about previous planning efforts for cabin replacement at WES, noting that Heidi Hatcher (now deceased) had envisioned constructing cabins in clusters of four rather than a linear arrangement. The commenter added that incorporating restrooms into each cabin would increase maintenance compared to centralized bath houses, and that Hatcher had proposed exploring environmentally friendly materials such as straw-bale walls as an educational demonstration. The commenter acknowledged that such materials may be difficult to implement but provided this context for consideration.

**NPS Response:** The NPS appreciates the commenter’s historical perspective on earlier WES cabin replacement concepts and recognizes the contributions of Heidi Hatcher to past planning discussions. Although these earlier ideas are not part of the current EA, the background helps illustrate the range of approaches that have been considered over time for cabin layout, utilities, and sustainability features. The current cabin design presented in the EA reflects updated requirements for program functionality, accessibility, wildfire resilience, long-term maintenance, and compliance with modern building codes and engineering standards. The cluster-of-four configuration and strawbale construction approach described by the commenter were not included in the present planning process due to feasibility challenges, including structural performance, moisture management, durability, and adherence to federal design standards for facilities that serve large groups of students. Regarding restrooms, the EA evaluates the cabin and bathhouse configuration that best meets operational needs, energy and water efficiency objectives, maintenance capacity, and student safety. Centralized restrooms can reduce long-term operational demands, but final design decisions will continue to balance student supervision, energy efficiency, accessibility, and infrastructure constraints. The NPS values sustainable design and environmental education and will continue exploring opportunities, within feasible engineering and regulatory limits, to incorporate environmentally responsible materials, interpretive elements, or demonstrations into the broader WES campus redevelopment. These opportunities are typically considered in later design phases once core program functions and code requirements are established.

## **Appendix C:**

# **A Non-Impairment Determination- Whiskeytown Environmental School Rebuild**

By enacting the National Park Service (NPS) Organic Act of 1916 (Organic Act), Congress directed the U.S. Department of the Interior and the NPS to manage national park system units “to conserve the scenery, natural and historic objects, and wild life in the system units and to provide for the enjoyment of the scenery, natural and historic objects, and wild life in such manner and by such means as will leave them unimpaired for the enjoyment of future generations” (54 United States Code [USC] 100101). NPS Management Policies 2006, section 1.4.4, explains the prohibition on impairment of park resources and values:

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

An action constitutes impairment when its impacts “will harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values” (NPS 2006, section 1.4.5). To determine impairment, the NPS must evaluate the particular resources and values that will be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts. An impact on a park resource or value may, but does not necessarily, constitute impairment, but an impact would be more likely to constitute impairment when it affects a resource or value whose conservation is:

- necessary to fulfill specific purposes identified in the park’s establishing legislation or proclamation, or
- key to the park’s natural or cultural integrity or to opportunities for enjoyment of the park, or
- identified in the park’s general management plan or other relevant NPS planning documents as being significant.

Generally, natural and cultural resources are subject to the non-impairment standard and are clarified further in section 1.4.6 of the NPS Management Policies 2006 (NPS 2006).

## Purpose and Significance of WHIS

Congress established WHIS in 1965 to fulfill the conservation and recreational purposes of the Central Valley Project in Northern California. WHIS provides opportunities for recreation in both a lake-based and scenic mountain setting while conserving the scientific, natural, historic, and cultural values for the enjoyment and inspiration of present and future generations.

Significance statements express why an area's resources and values are important enough to merit designation as a unit of the National Park System. Statements of significance describe the distinctive nature of an area and why it is important within a global, national, regional, and Systemwide context, focusing on the most important resources and values that will assist in planning and management. The following significance statements have been identified for WHIS.

1. From the peak of Shasta Bally to the Sacramento Valley floor, the wide range in elevation, location, connection to surrounding areas, and convergence of four ecological provinces support diverse ecosystems and provide habitat for protected animal and plant species, including the only known global location of Howell's alkali grass (*Puccinellia howellii*).
2. Whiskeytown Environmental School, managed by the Shasta County Office of Education, is one of the longest-running outdoor environmental education centers among the national recreation areas administered by the NPS. Together with the recreation area's interpretive program, research, and partnerships, the school provides outstanding opportunities for understanding and appreciating the recreation area's natural and cultural resources.
3. The recreation area provides a variety of outdoor recreation opportunities in both a lake based and scenic mountain setting, ranging from family boating to inspirational experiences in wild, undeveloped places.
4. WHIS's landscape, historic sites, and remnant gold mining features provide unique opportunities within the national recreation area system to understand the dramatic effects of the California Gold Rush.
5. Whiskeytown Lake is an important component of the Central Valley Project that transformed California's growth, economy, and agriculture through the delivery of clean water. The creation of WHIS helped fulfill one of the goals of the Central Valley Project—to provide recreational opportunities to the local community and visitors.
6. WHIS protects and preserves a continuous record and remnant sites of people. Beginning with Native American settlement thousands of years ago, the recreation area's landscape reflects the stories of how diverse groups of people have utilized the area's resources through time.

The resources that were carried forward for detailed analysis in the EA, including natural and cultural resources, are considered necessary to fulfill specific purposes identified in the establishing legislation of WHIS, are identified for management in relevant NPS planning

documents, or are key to the natural or cultural integrity of the Park. Accordingly, a non-impairment determination is made for these resources. This non-impairment determination has been prepared for the Selected Alternative.

### ***CULTURAL RESOURCES***

The Selected Alternative, along with the other projects, are unlikely to result in an adverse effect to historic properties. The WES facility and site P45-002711 were determined not eligible for the NRHP (CA OHP # NPS\_2023\_0112\_001). An archeological site located within the study area is determined eligible for the NRHP (CA OHP # NPS890804A) and is unlikely to be adversely affected by the actions proposed in the Selected Alternative. Ground disturbing activities would be monitored, and mitigations are in place in the case of an unintended discovery of cultural resources (Appendix D).

In accordance with the National Historic Preservation Act, 36 CFR Part 800, consultation with the California Office of Historic Preservation and our Tribal Partners would be undertaken for all actions under the Selected Alternative.

### ***NATURAL RESOURCES***

Most actions proposed under the Selected Alternative would occur in an area that is previously disturbed and where potential for adverse impacts on wildlife and threatened and endangered species is minimal. Potential direct adverse impacts could result from disturbance associated with equipment, noise, and construction activity in the project area and may cause potential indirect adverse impacts from construction. However, these impacts would be temporary in nature, and mitigations have been identified to minimize potential impacts during construction (Appendix D).

### ***CONCLUSION***

The NPS has determined that implementation of the Selected Alternative will not constitute impairment of the resources of WHIS and will enhance Significance Statement two which identifies WES as an important program for the park. This conclusion is based on consideration of the purpose and significance of WHIS, a thorough analysis of the environmental impacts described in the EA, comments provided by the public and the professional judgment of the decision maker guided by the direction in NPS Management Policies 2006.

## **Appendix D: Selected Alternative Mitigation Measures**

The following Mitigation Monitoring and Reporting Program identifies the Mitigation Measures that will be implemented as part of the Whiskeytown Environmental School Project. The National Park Service (NPS) or its Contractors under the supervision of the NPS will be responsible for implementing the following measures. The NPS will be responsible for monitoring to ensure the following measures are effectively implemented to reduce impacts to less-than-significant levels.

	<b>Mitigation, Avoidance, and Minimization Measures</b>	<b>Implementation Timing</b>	<b>Implementation &amp; Verification Responsibility</b>	<b>Legal Authority for Mitigation</b>
<b>Air Quality</b>				
<b>Mitigation</b>	<b>Mitigation Measure AQ-1: Implement Construction Mitigation Measures</b> The following applicable Construction Mitigation Measures shall be implemented by construction contractors to reduce emissions of fugitive dust and exhaust: <ul style="list-style-type: none"> <li>Exposed surfaces including parking areas, staging areas, soil piles, graded areas, and unpaved access roads shall be watered two times per day when conditions are dry.</li> </ul>	Prior to and during construction	NPS/ Construction Contractor & NPS Contracting Officer Representative (COR)	Clean Air Act of 1967 42 USC 7401-7671q
<b>AQ-2</b>	<ul style="list-style-type: none"> <li>Haul trucks transporting soil, sand, or other loose material off site shall be covered.</li> </ul>	During construction	NPS/ Construction Contractor & COR	
<b>AQ-3</b>	<ul style="list-style-type: none"> <li>Visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day.</li> </ul>	During construction	NPS/ Construction Contractor & COR	
<b>AQ-4</b>	<ul style="list-style-type: none"> <li>Vehicle speeds on unpaved roads shall be limited to 15 mph within the project area.</li> </ul>	During construction	NPS/ Construction Contractor & COR	
<b>AQ-5</b>	<ul style="list-style-type: none"> <li>Roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.</li> </ul>	During construction	NPS/ Construction Contractor & COR	
<b>AQ-6</b>	<ul style="list-style-type: none"> <li>Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at access points.</li> </ul>	During construction	NPS/ Construction Contractor & COR	
<b>AQ-7</b>	<ul style="list-style-type: none"> <li>Construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. Equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.</li> </ul>	During construction	NPS/ Construction Contractor & COR	

	Mitigation, Avoidance, and Minimization Measures	Implementation Timing	Implementation & Verification Responsibility	Legal Authority for Mitigation
<b>Biological Resources</b>				
<b>BIO-1</b> <b>General Construction</b>	<ul style="list-style-type: none"> <li>• A qualified biologist will provide Worker Environmental Awareness Training to field management and construction personnel. Communication efforts and training will take place during preconstruction meetings so that construction personnel are aware of their responsibilities and the importance of compliance. Training will identify the types of sensitive resources located in the project area and the measures required to avoid impacts. Materials covered in the training program will include environmental rules and regulations for the specific project and requirements for limiting activities to the construction right-of-way and avoiding demarcated sensitive resource areas.</li> <li>• If new construction personnel are added to the project, the contractor will ensure the new personnel receive training before starting work. A sign-in sheet of those contractor individuals who have received the training will be maintained by the NPS COR. A representative will be appointed during the training to be the contact for an employee or contractor who might inadvertently kill or injure a listed species or who finds a dead, injured, or entrapped individual.</li> <li>• Outdoor food storage will adhere to park policies already in place to ensure no unattended food sources are available to wildlife. This includes the daily removal of trash and food waste from the work site.</li> <li>• Contractors and employees will be given orientation and education about working in black bear country and briefed on proper food storage and safety measures. Orientation will include information about park regulations regarding food storage, disposal of garbage, and other bear attractions, safety measures, and approaching or harassing wildlife.</li> <li>• If individuals of listed wildlife species may be present and subject to potential injury or mortality from construction activities, a qualified biologist will conduct preconstruction surveys. If a listed wildlife species is</li> </ul>	Prior to construction	NPS/ Qualified Biologist/construction Contractor & NPS COR	NPS Organic Act of 1916 (16 U.S.C. § 1)

	Mitigation, Avoidance, and Minimization Measures	Implementation Timing	Implementation & Verification Responsibility	Legal Authority for Mitigation
<b>Biological Resources</b>				
	<p>discovered, construction activities will not begin in the immediate vicinity of the individual until NPS is contacted and the individual has been allowed to leave the construction area.</p> <ul style="list-style-type: none"> <li>• Minimum qualifications for a qualified biologist will be a four-year college degree in biology or related field and demonstrated experience with the species of concern.</li> </ul>			
<b>BIO-2: Northwestern Pond Turtles</b>	<ul style="list-style-type: none"> <li>• Prior to construction, training will be provided to construction personnel to conduct daily surveys around construction equipment and work sites to check for the presence of northwestern pond turtles that may be traversing the site. In the event a turtle is located, park natural resource staff will be notified and will monitor the turtle until it has moved beyond the construction area.</li> <li>• Preconstruction surveys for northwestern pond turtle shall be conducted by a qualified biologist prior to clearing and grubbing, equipment staging, excavation or other construction-related activity or vegetation management activities requiring the use of heavy equipment. Preconstruction surveys shall be conducted within 5 days prior to, and again immediately prior to construction activities to identify the presence of northwestern pond turtles.</li> <li>• The artificial pond on site will be protected by temporary fencing during construction.</li> <li>• Consultation with USFWS may be necessary to determine additional mitigation measures, and consultation may be needed to comply with Section 7 of the ESA if the species is formally listed under ESA before or during the implementation of the project.</li> </ul>	Prior to and during construction	NPS COR/ Qualified Biologist & NPS COR	Proposed for Listing under the Endangered Species Act of 1973 U.S.C. §1531 et seq. (1973)

	Mitigation, Avoidance, and Minimization Measures	Implementation Timing	Implementation & Verification Responsibility	Legal Authority for Mitigation
<b>Biological Resources</b>				
<b>BIO-3: Nesting Birds</b>	<ul style="list-style-type: none"> <li>Vegetation removal such as clearing and grubbing, vegetation management activities requiring heavy equipment, tree removal, or tree trimming shall be performed outside of the bird nesting season (February 1st through August 31st) to avoid impacts to nesting birds; if these activities must be performed during the nesting bird season, a qualified biologist shall conduct a pre-construction survey for nesting birds and verify the presence or absence of nesting birds no more than 5 calendar days prior to vegetation removal. Surveys shall be performed in order to locate active passerine (perching bird) nests and to locate active raptor nests. If nesting birds and raptors do not occur within 250 and 500 feet of the area, then no further action is required if construction begins within 5 calendar days.</li> <li>If active nests are located during the pre-construction bird nesting surveys, no-disturbance buffer zones shall be established around nests, with a buffer size established by the qualified biologist. Typically, these buffer distances are between 50 feet and 250 feet for passerines and between 300 feet and 500 feet for most raptors, and 0.25 to 0.5 miles for eagles. These distances may be adjusted depending on the level of activity and if an obstruction, such as a building or structure, is within line-of-sight between the nest and construction. Reduced buffers may be allowed if a full-time qualified biologist is present to monitor the nest and has authority to halt construction if bird behavior indicates continued activities could lead to nest failure. Buffered zones shall be avoided until young have fledged or the nest is otherwise abandoned.</li> </ul>	Prior to construction	NPS COR/ Qualified Biologist & NPS COR	Migratory Bird Treaty Act of 1918 16 U.S. Code § 703 Bald and Golden Eagle Act of 1940 (16 <a href="#">U.S.C.</a> 668-668d)

	Mitigation, Avoidance, and Minimization Measures	Implementation Timing	Implementation & Verification Responsibility	Legal Authority for Mitigation
<b>Biological Resources</b>				
<b>BIO-4: Special Status Fish Species</b>	<ul style="list-style-type: none"> <li>Implement water quality mitigation measures identified in Mitigation Measure Stormwater-1 to reduce the potential for impacts to Clear Creek from construction.</li> <li>No lights will be used within the vicinity of Clear Creek. If lighting is needed, it will be shielded from the creek.</li> <li>In consultation with NOAA Fisheries, and to the furthest extent possible, conduct construction outside of spawning and rearing periods to minimize potential disturbance. Central Valley spring-run Chinook typically migrates, spawns, and rears from March to October.</li> <li>In consultation with NOAA Fisheries, and to the furthest extent possible, conduct construction outside of Steelhead spawning and rearing periods to minimize potential disturbance. Their typical spawning period is from December to April.</li> <li>No construction will occur in Clear Creek.</li> </ul>	Prior to and during construction	Construction Contractor/NPS Biologist & NPS COR	<u>Endangered Species Act of 1973</u> <u>U.S.C. §1531 et seq. (1973)</u>  Federal Water Pollution Control Act (Clean Water Act) of 1972 33 USC 1251–1387
<b>BIO-5: Monarch Butterfly</b>	<ul style="list-style-type: none"> <li>Before construction starts, butterfly surveys will be conducted, specifically looking for monarch butterflies. If monarchs are found, their habitat will be clearly flagged, and the WHIS Vegetative Ecologist and the Wildlife Biologist will be notified for next steps.</li> <li>Consultation with USFWS may be necessary to determine additional mitigation measures, and consultation may be needed to comply with Section 7 of the ESA if the species is formally listed under ESA before or during the implementation of this project.</li> </ul>	Prior to and during construction	NPS COR/ Qualified Biologist & NPS COR	Proposed for Listing under the Endangered Species Act of 1973 U.S.C. §1531 et seq. (1973)

	Mitigation, Avoidance, and Minimization Measures	Implementation Timing	Implementation & Verification Responsibility	Legal Authority for Mitigation
<b>Biological Resources</b>				
<b>BIO-6: Vegetation</b>	<ul style="list-style-type: none"> <li>• Prior to commencing site-specific activities associated with construction, a botanical survey of the site will be completed. The survey will include areas that will be directly and indirectly impacted. The survey will include mapping of plant communities including sensitive plant species and invasive species. The vegetation surveys will be timed to cover expected species-specific blooming periods to ensure that detection probability of sensitive species is maximized.</li> <li>• If sensitive plant species occur within the project work limits, then the biologist will establish an adequate buffer area for each plant population to exclude activities that directly remove or alter the habitat of, or result in indirect adverse impacts on, sensitive plant species. If avoidance is not possible, the NPS will determine the best course of action to avoid or minimize impacts, such as transplantation.</li> <li>• A revegetation plan will include collecting seed from nearby areas where possible, monitoring of invasives prior to and after construction, salvaging native topsoil and plant materials during construction, and monitoring the revegetated area, with maintenance and replacement as needed.</li> <li>• Tree trimming will be completed using accepted arborist techniques that minimize long-term impacts to trees. The large oak trees that occur on the northern side of the buildable zone shall be protected from disturbance by placing temporary exclusionary fencing at the drip line of the trees. An arborist shall be consulted and potentially monitor construction activities to avoid any root damage through soil compaction and other disturbance.</li> <li>• Retaining as much riparian vegetation as possible is a priority for the bridge removal, with restoration of the site(s) affected as needed.</li> <li>• Invasive plant monitoring and treatment will be conducted prior to and following construction, and native topsoil and plant materials would be salvaged and</li> </ul>	Prior to construction	COR and Qualified Biologist	NPS Organic Act of 1916 (16 U.S.C. § 1) and Federal Noxious Weed Act (7 U.S.C. § 2801 et seq.)

	Mitigation, Avoidance, and Minimization Measures	Implementation Timing	Implementation & Verification Responsibility	Legal Authority for Mitigation
<b>Biological Resources</b>				
	<p>reused, where possible, during construction.</p> <ul style="list-style-type: none"> <li>• Equipment entering the park will be cleaned and pressure washed to remove foreign soil and non-native vegetation, seeds, and other materials that may contain nonnative seeds or vegetation.</li> <li>• The introduction of exotic plant species shall be avoided through physical or chemical removal and prevention. Measures to prevent the introduction of exotic plants into the project site via vehicular sources shall include cleaning of vehicles coming to the site and leaving the site. Earthmoving equipment shall be cleaned prior to transport to the project area. Weed-free rice straw or other certified weed-free straw shall be used for erosion control.</li> </ul>			
<b>BIO-7 Wetlands/ Floodplains</b>	<ul style="list-style-type: none"> <li>• Construction activities shall be implemented in full compliance with Section 401 and 404 of the Clean Water Act, and in consultation with the U.S. Army Corps of Engineers. The requirements will include measures to prevent or control spills of fuels, lubricants, or other contaminants from entering nearby waterways. Appropriate erosion and siltation controls will be maintained during construction and exposed soil, or fill will be stabilized and maintained. When possible, excavated materials will be stored at an upland site or when not practicable, placed on filter cloth, mats, or other semipermeable surface to protect wetlands. Runoff from stockpiled material will be controlled by silt fencing, filter cloth, coir wattles, or other appropriate means to prevent impacts to wetlands. Temporary stockpiles in wetlands will be removed as soon as practicable and temporary disturbance will be returned to pre-existing elevations, soil hydrology, and native vegetation communities must be restored. Revegetation of disturbed soil areas should be facilitated by salvaging and storing existing topsoil and reusing it in restoration efforts in accordance with NPS policies and guidance. Topsoil storage must be for as short a time as possible to prevent loss of seed and root viability, loss of organic matter, and degradation of the soil microbial community. Heavy equipment use will be avoided in wetlands, will avoid creating ruts, and will use mats or other measures to minimize soil and plant disturbances to preserve</li> </ul>	Prior to construction	NPS and Qualified Biologist & NPS COR	Federal Water Pollution Control Act (Clean Water Act) of 1972 <a href="#">33 USC 1251–1387</a>

	Mitigation, Avoidance, and Minimization Measures	Implementation Timing	Implementation & Verification Responsibility	Legal Authority for Mitigation
<b>Biological Resources</b>				
	<p>preconstruction elevations.</p> <ul style="list-style-type: none"> <li>Project activities will avoid impacts to wetlands to the extent possible. The wetlands located near the construction area are freshwater forested/shrub wetlands with sections of riverine wetland such as near Clear Creek Bridge. Wetlands will be protected with high visibility fencing to ensure that inadvertent damage does not occur.</li> </ul>			
<b>BIO-8: Bat Species</b>	<ul style="list-style-type: none"> <li>To avoid adverse impacts to bats, particularly during the maternity season, rehabilitation of existing buildings will not occur from March 15<sup>th</sup> to July 31<sup>st</sup> unless a pre-construction bat survey is conducted.</li> <li>If bats are discovered or disturbed during construction, work will stop immediately and the WHIS Biologist will be notified.</li> <li>As the renovation and demolition of buildings will cause loss of habitat for bat colonies, bat boxes will be installed to provide additional habitat.</li> <li>Buildings with known bat roosts will have exclusions applied after an outflight prior to work requiring siding removal or replacement. This work will not occur during the maternity season (March 15<sup>th</sup> to July 31<sup>st</sup>).</li> </ul>	Prior to and during construction	COR and Construction Contractor & NPS COR	NPS Organic Act of 1916 (16 U.S.C. § 1)

	Mitigation, Avoidance, and Minimization Measures	Implementation Timing	Implementation & Verification Responsibility	Legal Authority for Mitigation
<b>Cultural Resources</b>				
CUL-1	<ul style="list-style-type: none"> <li>Prior to authorization to proceed, a Secretary of the Interior-qualified Archaeologist will conduct a training program for construction and field workers involved in site disturbance. On-site personnel shall attend a mandatory pre-project training that will outline the general archaeological sensitivity of the area and the procedures to follow in the event archaeological resources and/or human remains are inadvertently discovered.</li> </ul>	Prior to construction	Secretary of the Interior-qualified Archaeologist & NPS COR	National Historic Preservation Act of 1966 <a href="#">54 USC 300101 et seq</a>
CUL-2	<ul style="list-style-type: none"> <li>Park managers shall consult with Federally Recognized Native American tribes and may consult with non-federally recognized tribes to ensure that the proposed undertakings are conducted in a way that respects the beliefs, traditions, and other cultural values of the Native People who have ancestral ties to park lands. Tribal Monitors may be required for proposed undertakings in consultation with the park's Tribal Partners.</li> <li>If prehistoric or historic-era archaeological resources or tribal cultural resources are encountered by construction personnel during project implementation, construction activities within 200 feet shall halt and the contractor shall notify the WHIS Cultural Resource Program Manager or onsite Agency/Tribal Monitor. Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil ("midden") containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); battered stone tools, such as hammerstones and pitted stones. Historic-era materials might include stone, concrete, or adobe footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse.</li> </ul>	<p>Prior to construction</p> <p>During Construction</p>	Secretary of the Interior-qualified Archaeologist, and Construction Contractor & NPS COR	National Historic Preservation Act of 1966 <a href="#">54 USC 300101 et seq</a>

	<b>Mitigation, Avoidance, and Minimization Measures</b>	<b>Implementation Timing</b>	<b>Implementation &amp; Verification Responsibility</b>	<b>Legal Authority for Mitigation</b>
<b>Cultural Resources</b>				
<b>CUL-3</b>	<ul style="list-style-type: none"> <li>The Secretary of Interior-qualified Archaeologists will inspect the findings within 24 hours of discovery. If it is determined that the project could damage a historical resource as defined by NHPA, construction shall cease in an area determined by the archaeologist until a mitigation plan has been prepared and implemented to the satisfaction of the archaeologist. In consultation with the Native American representative if the resources are prehistoric, the archaeologist shall determine when construction can commence.</li> <li>The mitigation plan shall recommend preservation in place, as a preference, or, if preservation in place is not feasible, data recovery through excavation. If preservation in place is feasible, this may be accomplished through one of the following means: (1) modifying the construction plan to avoid the resource; (2) incorporating the resource within open space; (3); or capping and covering the resource before building appropriate facilities on the resource site. If preservation in place is not feasible, a qualified archaeologist shall prepare and implement a detailed treatment plan to recover the scientifically consequential information from and about the resource, which shall be reviewed and approved by the NPS and Native American representative prior to excavation at the resource. Treatment for most resources would consist of (but would not be limited to) sample excavation, artifact collection, site documentation, and historical research, with the aim to target the recovery of important scientific data contained in the portion(s) of the resource to be impacted by the project. The treatment plan shall include provisions for analysis of data in a regional context, reporting of results within a timely manner, curation of artifacts and data at an approved facility, and dissemination of reports to local and state repositories, libraries, and interested professionals. Work shall be completed in accordance with pertinent laws and regulations, including the stipulations of the 2008 Programmatic Agreement Among the National Park Service, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers.</li> </ul>	During construction	Secretary of the Interior-qualified Archaeologist, and construction contractor	National Historic Preservation Act of 1966 <a href="#">54 USC 300101 et seq</a>

	<b>Mitigation, Avoidance, and Minimization Measures</b>	<b>Implementation Timing</b>	<b>Implementation &amp; Verification Responsibility</b>	<b>Legal Authority for Mitigation</b>
<b>Cultural Resources</b>				
<b>CUL-4</b>	<ul style="list-style-type: none"> <li>In the event that human remains are discovered, work shall cease immediately within 200 feet of the find and the Contractor shall immediately contact WHIS Dispatch and the WHIS Cultural Resource Program Manager. The find shall be secured and protected in place. Provisions outlined in the Native American Graves Protection and Repatriation Act (25 USC § 3001 - 3013) of 1990 and related implementing regulations at 43 CFR will be followed (National Archive, 2024 and Government Publishing Office, 2022). The park will notify the appropriate law enforcement official(s) for further investigation and to secure the site. If it is determined that the remains are Native American, the Contractor or other entity shall work with the park to ensure compliance with NAGPRA. It is the park's responsibility to comply with NAGPRA.</li> </ul>	During Construction	Secretary of the Interior-qualified archaeologist, construction contractor, & NPS COR	Native American Graves Protection and Repatriation Act 25 USC § 3001 - 3013
<b>CUL-5</b>	<ul style="list-style-type: none"> <li>There are three historic apple trees, and one historic cherry tree present at WES. Each historic tree will be marked for avoidance with protective fencing installed around them at the drip line to avoid damage to their root systems during construction. Pruning will be part of the mitigation measures associated, including other protection measures as identified by a qualified arborist.</li> </ul>	During Construction	Secretary of the Interior-qualified Archaeologist and construction contractor	National Historic Preservation Act of 1966 <a href="#">54 USC 300101 et seq</a>

	Mitigation, Avoidance, and Minimization Measures	Implementation Timing	Implementation & Verification Responsibility	Legal Authority for Mitigation
<b>Hazards and Hazardous Materials</b>				
<b>HAZ-1</b>	<ul style="list-style-type: none"> <li>Hazardous materials will be stored in a location where there is no potential to enter waterways, such as Clear Creek. Hazardous materials will be stored in secondary containment, such as in a prefabricated temporary containment mat, a temporary earthen berm, or other measure, and will be covered when rain is forecast or during wet weather.</li> <li>To the greatest extent possible, refueling of vehicles and equipment will occur 50 feet from waterways, to prevent pollutants from entering waterways, mainly Clear Creek.</li> </ul>	Prior to and during construction	Construction Contractor & NPS COR	Federal Water Pollution Control Act (Clean Water Act) of 1972 <a href="#">33 USC 1251-1387</a>
<b>SW-1</b>	<ul style="list-style-type: none"> <li>Because the work area is larger than one acre, the project contractor will be required to prepare a Stormwater Pollution Prevention Plan (SWPPP) for construction activities according to the National Pollutant Discharge Elimination System (NPDES) Construction General Permit requirements. The objectives of the SWPPP will be to (1) identify pollutant sources associated with construction activity and project operations that may affect the quality of stormwater and (2) identify, construct, and implement stormwater pollution prevention measures to reduce pollutants in stormwater discharges during and after construction. The NPS contractor(s) will develop and implement a spill prevention and control plan as part of the SWPPP to minimize effects of spills of hazardous, toxic, or petroleum substances during construction of the project. Implementation of this measure will comply with state and federal water quality regulations. The SWPPP will be kept on site during construction activity and during operation of the project and will be made available upon request to representatives of the Regional Water Quality Control Board (Regional Water Board). The SWPPP will include but is not limited to:</li> </ul>	Prior to and during construction	Construction Contractor & NPS COR	Federal Water Pollution Control Act (Clean Water Act) of 1972 33 USC 1251-1387

	<ul style="list-style-type: none"><li>• A description of potential pollutants to stormwater from erosion.</li><li>• Management of dredged sediments and hazardous materials present on site during construction (including vehicle and equipment fuel).</li><li>• Details of how the sediment and erosion control practices comply with state and federal water quality regulations.</li><li>• A description of potential pollutants to stormwater resulting from operation of the project.</li></ul>			
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