

National Park Service
U.S. Department of the Interior

Sequoia and Kings Canyon National Parks
Regions 8, 9, 10, and 12



FINDING OF NO SIGNIFICANT IMPACT and DECISION DOCUMENT: Rehabilitate or Replace Deficient and Deteriorated Employee Housing at Lodgepole

This finding of no significant impact was concluded from an environmental assessment (EA) of the Rehabilitate or Replace Deficient and Deteriorated Employee Housing at Lodgepole project's impacts to park resources. The EA represents the National Park Service's (NPS's) good-faith effort to fulfill the National Environmental Policy Act's (NEPA's) requirements by prioritizing documentation of the most important relevant considerations within the statutorily mandated page limits and timeline. This prioritization reflects the NPS's expert judgment. Any considerations addressed briefly or left unaddressed are, in the NPS's judgment, comparatively non-substantive and would not meaningfully inform the NPS's consideration of environmental effects and the resulting decision. The NPS certifies that the EA is substantially complete, thoroughly considered the factors mandated by NEPA, and contains analysis adequate to inform and reasonably explain the NPS's decision to issue a finding of no significant impact regarding the proposed action.

Recommended:

Clayton F. Jordan
Superintendent, Sequoia and Kings Canyon National Parks

Date

Approved:

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

Date

INTRODUCTION

In compliance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code [USC] 4321 et seq.); the U.S. Department of the Interior (DOI) NEPA regulations (43 Code of Federal Regulations [CFR] 46); the DOI NEPA Handbook (DOI 2026); the National Park Service (NPS) prepared an environmental assessment (EA) to examine alternative actions and environmental impacts associated with a proposed project to finalize and implement a master plan for the Lodgepole Employee Housing Area (Lodgepole Housing Area), in Sequoia National Park.

As described on pages 1–2 of the EA (Purpose and Need), the NPS is authorized to provide government-furnished housing for employees in circumstances where private sector housing is either unaffordable or unavailable within a reasonable commute. This approach is guided by Director’s Order 36, Reference Manual 36 (RM-36) (DOI 2024) and Section 9.4.3 of the NPS Management Policies (2006) (NPS 2006). Based on results of the 2012 Housing Needs Assessment for Sequoia and Kings Canyon and other national parks, housing options for Lodgepole staff to reside outside of the park are not affordable and do not exist within a reasonable 60-minute commuting distance.

Therefore, in accordance with Director’s Order 36, the NPS not only has a need to provide housing for employees at Lodgepole, but also to ensure that such housing is maintained in good condition, “is safe and sanitary, sited to avoid natural hazards whenever possible, integrated into the park environment and, to the best extent possible, energy efficient and cost-effective to maintain” (DOI 2024:2). Housing improvements are also needed to allow for all-season occupancy and greater flexibility for the NPS’s housing management, and to improve compatibility with the local environment and operational cost-effectiveness, consistent with Director’s Order 36.

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

SELECTED ALTERNATIVE AND RATIONALE FOR THE DECISION

Based on the analysis presented in the EA, the NPS selected Alternative 2—Finalize a Master Plan to Rehabilitate or Replace Deficient and Deteriorated Employee Housing at Lodgepole (the NPS’s proposed action)—as described within the EA and summarized below.

As described in Chapter 2 of the EA (pages 17–32), the NPS will finalize and implement a master plan to repair or replace aging units and infrastructure. Planned improvements related to building rehabilitation and replacement, common space and community amenities, accessibility improvements, pedestrian circulation and access, roadway improvements, emergency access, parking, utilities, and service and maintenance areas are described in detail on pages 17–31 of the EA.

The improvements will address employee health and safety by meeting current California code building requirements, meeting NPS housing standards, and addressing Architectural Barriers Act (ABA) deficiencies. Specifically, the plan will address issues stemming from physical degradation of structures, weather intrusion, rodent infestations, energy inefficiency, lack of accessibility routes and features, insufficient utility capacities, and inadequate tenant space and privacy. Additionally, improving access and circulation to the housing units will improve employee ingress and egress in winter and timely emergency service when needed. By rehabilitating housing units and infrastructure that can be effectively repaired and replacing that which cannot be, the project will also aim to improve the park’s operational efficiency, reduce operational costs associated with routine and

ongoing maintenance or repair needs, reduce energy and utility usage and cost, and better meet park housing demands.

The NPS will rehabilitate structures where repairs are feasible and demolish and replace structures that cannot be suitably repaired or do not otherwise meet housing standards (see EA Figure 3, page 9). Replacement housing will include a mix of single-family, duplex, and multi-unit facilities using standard NPS prototypes modified as necessary to meet local conditions and needs, while retained structures will be rehabilitated following structure-specific rehabilitation plans (see EA Table 2 [pages 19–21] and Table 3 [pages 22–23]). Each replaced or rehabilitated unit will be suited for the site's climate and snow conditions and will be designed to accommodate a total of 26 permanent employees and 60 seasonal employees. The project will be implemented in phases, with Phase 1 accomplishing 40% of the proposed upgrades including most seasonal housing; the remaining work will be accomplished in future phases.

Construction of the proposed action is expected to occur over a period of 4 to 5 years (48 to 54 months) with construction activities taking place spring through fall (an approximately 9-month-long window each year) (see EA page 18).

All project activities will take place within the limits of disturbance described in the EA, which encompasses just over approximately 8 acres and lies within the same footprint of the existing housing area. This area represents the maximum footprint of construction where all ground-disturbing activities (clearing, grading, removal, and fill) would occur during demolition, grading, road work, utility installation, and construction of new or rehabilitated buildings (see EA pages 27–28).

In accordance with NPS Director's Order 36, the NPS selected and designed the proposed replacement housing units using the standard NPS standard building prototypes and specifications that comply with accessibility requirements and applicable safety codes. Minor modifications to prototypes were made to accommodate site-specific context factors such as climatic conditions, and all modifications were assessed using the NPS value analysis process outlined under NPS Director's Order 90, which requires consideration of factors such as function and lifecycle costs.

Rationale

Alternative 2 was selected because it meets the purpose and need of the project in an efficient and effective manner. Based on the analysis presented in the EA, implementation of the selected alternative will beneficially affect employee health and safety and improve the park's operational efficiency.

Design Specifications

The selected action incorporates as integral to the project design specifications that would reduce or eliminate impacts to resources considered in the EA. These include specifications derived through Endangered Species Act Section 7 consultation with the U.S. Fish and Wildlife Service (USFWS) to reduce the potential for adverse effects to endangered fisher (*Pekania pennanti*).

OTHER ALTERNATIVES

In addition to the selected alternative, the EA fully evaluated one other alternative: Alternative 1, the No Action Alternative. The NPS did not develop additional action alternatives for housing improvements because other alternatives would have been less cost effective, less efficient, and more

impactful. As such, other action alternatives would not align with NPS policy, which prioritizes cost effectiveness, operational efficiency, and minimizing environmental and operational impacts. Pages 31–32 of the EA summarize other action alternatives that were not considered feasible or reasonable and therefore were not fully developed.

The No Action Alternative, described on page 17 of the EA, will not be selected because it does not meet the project's purpose and need. Under the No Action Alternative, the NPS would not finalize or implement a master plan to replace any infrastructure and would continue to maintain and repair existing building and utility infrastructure under the park's routine maintenance program. Extensive structural deficiencies, including major rehabilitation, would be addressed on a case-by-case basis in order of priority and as capacity and funding allow. Annual structural winterization and rooftop snow removal would also continue.

If, under the No Action Alternative, no housing improvements are made, existing housing would continue to fall below current code and accessibility requirements. Construction quality would remain low and deferred maintenance would continue to increase because most of the buildings are beyond their useful life and not good candidates for reconditioning. Thermal comfort would remain very poor due to inadequate building envelopes. Employees would remain at risk of contracting disease due to rodent infestation. Waterline breaks and power outages would continue to be common. The number of garage spaces available (14 under existing conditions) would remain low, leaving most of the 26 permanent employees without secure and weather-resistant storage space.

Under this alternative, the NPS anticipates some buildings would be abandoned for further use if staff capacity does not allow structures to be maintained in a safe and habitable condition. Park operations may need to be adjusted in the future to compensate for insufficient housing.

As described on page 34 of the EA, the No Action Alternative would perpetuate the existing risks to employee health and safety, and would also conflict with the agency's need under NPS Director's Order 36 to provide and maintain employee housing which is safe, sanitary, and cost-effective to maintain.

PUBLIC INVOLVEMENT/AGENCY CONSULTATION

The NPS solicited public input on the *Rehabilitate or Replace Deficient and Deteriorated Employee Housing at Lodgepole EA* during a 30-day public scoping period extending from June 17 through July 17, 2025. The public scoping effort resulted in the receipt of five pieces of correspondence from members of the public. These pieces of correspondence were reviewed by park staff, and considered in the decision-making process and in the writing of the EA.

During the public scoping period, the NPS posted all materials for public review and comment on the NPS Planning, Environment, and Public Comment (PEPC) website: <https://parkplanning.nps.gov/LodgepoleHousing>. The availability of the documents and the public review dates were announced through a press release. Public comments were accepted via U.S. mail and the PEPC website.

Upon approval of the FONSI, the NPS will make the FONSI and the associated EA publicly available on the NPS PEPC website. In accordance with the 2026 DOI Handbook of NEPA Implementing Procedures (516 DM 1 Handbook; DOI 2026), the NPS is not soliciting public comment on the EA.

Agency Outreach

The scoping release information was sent to federal, state, and local agencies; local businesses; and federal, state, and local elected officials. The scoping release notice was also provided electronically via news release, emails, and on the project website.

National Historic Preservation Act

The NPS initiated consultation with the State Historic Preservation Office (SHPO) under Section 106 of the National Historic Preservation Act in accordance with the standard process outlined in 36 CFR 800.3. In an initiation letter to the SHPO dated November 18, 2025, the NPS identified the preferred alternative as an undertaking and requested concurrence on the NPS's determination of no historic properties affected within the project's area of potential effects. The NPS received SHPO concurrence on this determination in a letter dated January 5, 2026 (NPS_2025_1126_001).

Endangered Species Act

The NPS informed the USFWS of the development of this EA on June 17, 2025, through a press release shared directly with agency partners. On December 22, 2025, the NPS initiated Endangered Species Act Section 7 consultation under the park's Programmatic Biological Opinion (08ESMF00-2020-F-2011-1) requesting USFWS concurrence that the project *may affect but is not likely to adversely affect* the Southern Sierra Nevada distinct population segment of the fisher. The USFWS responded to the NPS on March 24, 2026, concurring with this determination because 1) fisher are unlikely to den within the action area; 2) the NPS would conduct camera surveys for fisher and, if denning individuals are detected in nearby habitat, will delay construction until females can safely move kits away from disturbance or will consult with the USFWS as to an appropriate course of action; and 3) the NPS would implement additional design specifications (conservation measures) to further reduce the risk of adverse effects to fisher (FWS- 2025-0021102). All measures identified through consultation were incorporated directly into the selected action and are incorporated into the selected alternative by reference (see EA pages 17–32).

FINDING OF NO SIGNIFICANT IMPACT

A description of all potential environmental effects associated with the selected action and No Action Alternative is included in the EA (see EA pages 33–37), incorporated by reference herein. Based on the EA analysis, implementing the selected alternative will not result in significant adverse impacts on the quality of the human environment. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the NPS selected alternative will not violate any federal, state, or local environmental protection laws.

Consistent with the DOI NEPA Handbook, Section 1.2(b), the NPS evaluated the significance of the selected action, identified as the proposed action in the EA, by analyzing the potentially affected environment and the degree of the effects of the selected action. The degree of effect is considered by evaluating both short- and long-term effects, both beneficial and adverse effects, on employee health and safety. With the exception of operational benefits described in Appendix A, economic effects and effects on the quality of life of the American people were not discussed in the EA as the project site is not a public area and the effects related to these two issues were so small that they did not warrant discussion.

The EA discloses the reasonably foreseeable effects of the selected action, including the combined effects of the selected action with those of existing and reasonably foreseeable future actions on employee health and safety. While other park resources may experience some effects, those effects are minimal and were determined not to warrant detailed analysis in the EA. Accordingly, these resources are not discussed further here, as the anticipated effects are so minor that they have no potential to reach a level of significance. For a detailed description of issues considered but dismissed, see pages 5–16 of the EA.

Potentially Affected Environment

A detailed description of the potentially affected environment is included in the EA Chapter 3 (see Employee Health and Safety, Affected Environment, pages 33–34).

As described in the EA, the Lodgepole Housing Area is currently designed to house an average of 60 seasonal and 26 permanent employees. Seasonal employees currently reside within a mix of tent houses, cabins, apartments, and single-family residences. The existing housing units were constructed sporadically between the 1930s and 1980s and have received limited maintenance and modernization since that time. Many of the units currently show signs of age-related deterioration and do not meet current building codes and standards. In its current condition, the housing environment presents a range of health and safety risks to employees (residents), and diminishes overall resident comfort. Furthermore, the existing housing contributes to employee recruitment and retention challenges, as substandard living conditions can deter potential hires and lower morale among current staff. Park managers have received complaints from Lodgepole Housing Area residents about the building conditions and how they create a generally uncomfortable and undesirable living environment.

Specific employee health and safety concerns for the Lodgepole Housing Area include, but are not limited to, the following: a lack of ABA-accessible units and features; outdated and undersized utilities leading to plumbing failures, power outages, water damage and mold growth, and increased risk of fire; increased potential for structural failures; potential for exposure to lead-based paint and asbestos-containing materials; inadequate thermal conditions; lack of air conditioning; high electrical costs for employees; snow and ice accumulation near doorways; animal and insect intrusion; lack of assigned parking spaces; limited availability of garage spaces or covered parking for permanent employees; and undersized access roads which impede snow plowing activities.

Degree of Effects of the Action

The following discussion focuses only on issues that were analyzed in detail in the EA (Employee Health and Safety) and is organized around the five criteria described in the DOI NEPA Handbook, Section 1.2(b)(2).

Beneficial and Adverse, and Short-Term and Long-Term Effects

Under the selected alternative, replaced and rehabilitated buildings will improve indoor thermal conditions and the reliability and efficiency of utility systems, and will reduce the potential for rodent intrusion, resulting in long-term beneficial effects to employee health and safety. Accessibility improvements will benefit the safety of residents with disabilities long term. Parking and roadway improvements will benefit employees' long-term safety through increased parking availability and improved site access for critical service providers (see EA pages 35–37).

Collectively, the selected alternative's housing area improvements will result in a healthier, safer housing environment for residents over the long term. Residents' long-term exposure to various health and safety risks will be eliminated or significantly reduced relative to existing conditions. The improvements to the housing area will also align with the agency's obligations under NPS Director's Order 36, to provide and maintain employee housing which is safe, sanitary, and cost-effective to maintain.

The EA also identifies the potential for short-term adverse effects to employee health and safety resulting from construction-related noise, dust, and temporary relocation for some residents. However, these impacts are temporary, will be minimized through phased construction, and the creation of on-site temporary housing at the nearby Wuksachi site, or other developed area, and are not considered significant. Over the long term, the long-term benefits of new housing are expected to greatly outweigh these short-term adverse impacts to residents.

Effects on Public Health and Safety

As described in the EA (pages 35–37), the selected action will beneficially affect employee health and safety by improving indoor thermal conditions, accessibility, road access for emergency and maintenance vehicles, and reliability of utility systems and reducing the potential for rodent intrusion.

The selected alternative will not result in significant adverse effects to public health and safety. As detailed in Chapter 1 of the EA (page 5), project-related air emissions during construction will remain below applicable pollutant thresholds and will not significantly affect regional air quality due to their temporary and localized nature and the use of best management practices (BMPs) to minimize impacts. Additionally, impacts to surface water quality are not expected to occur under the selected alternative, as stormwater volumes would not noticeably change from existing conditions and new stormwater plantings would be added adjacent to paved areas to benefit water quality. Appropriate BMPs for drainage and sediment control would be implemented to prevent or reduce nonpoint source pollution and minimize soil loss (see EA page 30). Applicable stormwater permit requirements, including those required by the state's National Pollutant Discharge Elimination System construction stormwater general permit, will be followed during construction to ensure that applicable water quality standards are not exceeded as a result of project-related runoff (see EA page 7).

Economic Effects

The NPS considered effects of the selected alternative on park operations and management in Appendix A of the EA and found that the selected alternative will significantly reduce the need for maintenance and repairs and associated operations and maintenance (O&M) costs for the park. Additionally, all aspects of the selected alternative's master plan have been, and will continue to be, developed with consideration of their potential effect on park O&M needs, and their lifecycle costs (including costs for annual maintenance and operating costs) (see EA pages 18–19, 44). Although the selected alternative will improve operational efficiencies and reduce federal expenditures on park O&M activities, these cost savings are not expected to result in noticeable impacts on the national or regional economy.

The selected alternative is within an administrative area only and will not noticeably affect visitor use areas (see EA page 11); therefore, impacts on the park's recreation and tourism sectors are not expected. Although construction may generate some limited employment opportunities during

construction, resulting effects on the local and regional economy are expected to be minor and insignificant.

Effects on the Quality of Life of the American People

As described in Chapter 3 of the EA (pages 33–37), the selected alternative will benefit the quality of life for employees residing at the Lodgepole Housing Area by improving the conditions of housing units and associated infrastructure to address existing health and safety concerns (e.g., poor thermal conditions, unreliable utility systems, rodent intrusion, lack of accessibility features, and access issues for critical service providers). Additionally, as explained in Appendix A of the EA (page 42), the selected alternative will also benefit public services, including emergency and maintenance services, by widening, re-paving, and improving the maneuverability of the housing area's roadways and adding more dedicated visitor and maintenance parking spots which are evenly distributed throughout the housing area.

The selected alternative will not affect public access to the park, nor will it affect visitor use and experience, because the project is confined to administrative areas only. The selected alternative will not affect passive use of ecosystems, educational or research opportunities, or the way of life for Native Americans (see EA page 7, Cultural Resources, and page 38, National Historic Preservation Act).

DECISION

Based on the information contained in the EA and described above, the NPS has selected Alternative 2 for implementation. It is my determination that the selected action does not constitute a major federal action meeting the criteria that normally requires preparation of an environmental impact statement (EIS). Therefore, an EIS will not be prepared. This finding is based on consideration of the criteria for significance outlined in the DOI's NEPA Handbook, Section 1.2(b), regarding the potentially affected environment and degree of effects of the impacts described in the EA (which is hereby incorporated by reference) and as summarized above. The NPS certifies that it has considered all relevant information raised during the NEPA process and that the NEPA process is closed (516 DM 1 Handbook 4.1).

References

National Park Service (NPS). 2006. Management Policies. Washington, D.C.: U.S. Department of the Interior, National Park Service.

U.S. Department of the Interior (DOI). 2024. Director's Order 36: Housing Management. Available online at: https://www.nps.gov/subjects/policy/upload/DO_36_2-21-2024.pdf.

2026. U.S. Department of the Interior Handbook of National Environmental Policy Act Implementing Procedures. 516 DM 1. Washington, D.C.: U.S. Department of the Interior. Available online at: <https://www.doi.gov/media/document/doi-handbook-nepa-procedures>.

APPENDIX A: NON-IMPAIRMENT DETERMINATION

The Prohibition on Impairment of Park Resources and Values

NPS (2006) Management Policies, Section 1.4.4, explains the prohibition on impairment of park resources and values:

While Congress has given the Service management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the 1916 Organic Act, establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them. The impairment of park resources and values may not be allowed by the Service unless directly and specifically provided for by the legislation or by the proclamation establishing the park. The relevant legislation or proclamation must provide explicitly (not by implication or inference) for the activity, in terms that keep the Service from having the authority to manage the activity so as to avoid the impairment.

Guidance for Non-Impairment Determinations and the NPS NEPA Process (NPS 2025) provides guidance for completing non-impairment determinations for NPS actions requiring preparation of an EA or EIS pursuant to the NEPA. The NPS completed a non-impairment analysis for the *Rehabilitate or Replace Deficient and Deteriorated Employee Housing at Lodgepole EA* and determined that the selected alternative will not result in impairment of park resources, or in unacceptable impacts as described in NPS (2006) Management Policies, Section 1.4.7.1.

What is Impairment?

NPS (2006) Management Policies, Section 1.4.5, What Constitutes Impairment of Park Resources and Values, and Section 1.4.6, What Constitutes Park Resources and Values, provide an explanation of impairment. “Impairment is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values.” Section 1.4.5 of NPS (2006) Management Policies states:

[a]n impact to any park resource or value may, but does not necessarily, constitute impairment. An impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

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

An impact would be less likely to constitute impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated. An impact that may, but would not necessarily, lead to impairment may result from visitor

activities; NPS administrative activities; or activities undertaken by concessioners, contractors, and others operating in the park. Impairment may also result from sources or activities outside the park.

Per NPS (2006) Management Policies, Section 1.4.6 park resources and values at risk for being impaired include:

- the park's scenery, natural and historic objects, and wildlife, and the processes and condition that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; 11 water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structures, and objects; museum collections; and native plants and animals;
- appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;
- the park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and
- any additional attributes encompassed by the specific values and purposes for which the park was established.

Fundamental resources and values for Sequoia and Kings Canyon National Parks identified in the parks' foundation document include giant sequoia trees, ecological diversity, scenic landscapes, caves and karst systems, water resources, and wilderness character. While water quality was considered but dismissed in the EA, remaining resources are not addressed in the EA or discussed below because no impacts are expected to occur, and thus there is no potential for impairment.

As explained in the NPS's Guidance for Non-Impairment Determinations (NPS 2025), NPS non-impairment analysis normally does not include discussion of impacts to visitor access and experience, socioeconomic, public health and safety, environmental justice, land use, park operations, wilderness, etc., as these do not constitute impacts to park resources and values subject to the non-impairment standard under the Organic Act. See NPS (2006) Management Policies, Section 1.4.6.

Non-Impairment Determination for the Selected Alternative

This determination has been prepared for the selected alternative as described in the FONSI. As a basis for evaluating the potential for impairment or unacceptable impacts on the park's resources, the NPS relied on the *Rehabilitate or Replace Deficient and Deteriorated Employee Housing at Lodgepole EA*.

The EA conducted a detailed analysis of employee health and safety which does not require a non-impairment analysis and is therefore not analyzed for impairment.

As was documented in the EA, the selected alternative (Alternative 2) was found to have minimal or negligible impacts on other resources or issues such as air quality; aquatic resources; cultural resources; invasive species; soils; soundscapes; species of special concern, including endangered fisher and proposed threatened California spotted owl; vegetation; and wildlife. See Chapter 1 of the EA, Issues Considered but Dismissed, pages 5–16 for more information. The impacts to these resources are small and insignificant. The resources will remain available to be enjoyed by current

and future generations. Therefore, they will not be impaired by implementation of the selected action.

Conclusion

In conclusion, as guided by this analysis, available science and scholarship, advice from subject matter experts and others who have relevant knowledge and experience, and the results of public involvement activities, it is the Superintendent's professional judgement that there will be no impairment of park resources and values from implementation of the selected alternative.

This conclusion is based on consideration of the park's purpose and fundamental resources and values, a thorough analysis of the environmental impacts described in the EA, comments provided through agency and Tribal consultations, and the professional judgment of the decision-maker guided by the direction of NPS (2006) Management Policies 2006, the NPS (2025) Guidance for Non-Impairment Determinations, and the NEPA process.

References

National Park Service (NPS). 2006. Management Policies. Washington, D.C.: U.S. Department of the Interior, National Park Service.

National Park Service (NPS). 2025. Revised Guidance for Non-Impairment Determinations and the National Environmental Policy Act Process Memorandum. April 2025. Washington, D.C.: U.S. Department of the Interior, National Park Service.