



National Park Service
U.S. Department of the Interior
Glacier National Park
Montana

**FINDING OF NO SIGNIFICANT IMPACT
LAKE MCDONALD PROPERTIES MANAGEMENT PLAN EA**

Recommended:




Jeff Mow
Superintendent, Glacier National Park

7/9/2019

Date

Approved:



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7/23/19

Date

INTRODUCTION

In compliance with the National Environmental Policy Act (NEPA), the National Park Service (NPS) prepared an Environmental Assessment (EA) to examine alternative actions and environmental impacts associated with the proposed project to develop a preservation and management strategy for cabins and outbuildings around Lake McDonald that were once privately-owned but have come into NPS possession over the last decade. Most of these structures are listed in the National Register of Historic Places (NRHP), and many are in need of repair/rehabilitation. A strategy is needed to guide the management of the properties and to acquire funds for their preservation before the buildings deteriorate to the point where demolition and removal are the only available options.

The statements and conclusions reached in this finding of no significant impact (FONSI) are based on documentation and analysis provided in the EA and the 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 B – Manage NPS-Owned Properties at Lake McDonald Using an Adaptive Decision Framework (the NPS preferred alternative, pages 22-26 in the EA).

The selected alternative will use an adaptive decision framework to enable the preservation of historic properties considered in the EA, and to guide the future use of the properties. Five management options were identified and prioritized for the properties, based on historic preservation and administrative needs and objectives, the condition of the structures, and feasibility. The five management options include historic leasing, assigning to an interested concessioner, NPS administrative use (e.g. park housing, offices, storage), stabilization, or documentation followed by removal (Table 1). If the first management option for a given property is not underway or cannot be implemented by the timeframes specified in Table 1 (generally ranging from one to two years), then second, third and fourth management options identified for each property will be triggered. In all cases but one, the decision to remove a structure will only be made after other management options have been exhausted.

In the EA, the preferred alternative included management options for NPS-owned structures at Kelly's Camp and the Wheeler property on the northwest shore of Lake McDonald. All but one of these structures (the Burton K. Wheeler Cabin at the Wheeler property) were destroyed by the Howe Ridge Fire in August of 2018. Therefore, the selected alternative described in this FONSI does not include management of the Kelly's Camp structures or five of the Wheeler property structures, since these structures are gone. The selected alternative still includes management of the Burton K. Wheeler Cabin, with the same management options described in the EA for the Wheeler property (Table 1).

Table 1: Ranked management options for each property under the selected alternative.

Property	Alternative B - Ranked Options
Wheeler Camp (Burton K. Wheeler Cabin)	<p>Option 1: Historic lease to non-profit organization and or park partners.</p> <p>Option 2: If historic leasing to a non-profit or park partners is not secured, then historic lease for private purposes.</p> <p>Option 3: If historic leasing is not in place and there are no legitimate interested parties within 3 years, then use for NPS administrative purposes. Buildings will be preserved with available preservation funds.</p>
Greve's Tourist Camp	<p>Option 1: Historic lease.</p> <p>Option 2: If historic leasing is not in place and there are no legitimate interested parties within 12-18 months, then seek funding to stabilize buildings and structures.</p> <p>Option 3: If the structures deteriorate to an unacceptable level before stabilization funding can be found, then document and remove.</p>
Johnson-Graham Cabin	<p>Option 1: Remove. This building has reached a condition such that repair and rehabilitation are no longer practicable.</p>
Grisley Property	<p>Option 1: Historic lease (unevaluated building; considered historic until can be evaluated).</p> <p>Option 2: If leasing is not in place and there are no legitimate interested parties within 18-24 months, then consider assigning to a concessioner.</p> <p>Option 3: If there is no interest from concessioners within 12-18 months, then use for NPS administrative purposes.</p>
<p>Moberly Property</p> <p>Moberly House</p> <p>Guest Cabin</p>	<p>Option 1: Historic lease.</p> <p>Option 2: If historic leasing is not in place and there are no legitimate interested parties within 18-24 months, then consider assigning to a concessioner.</p> <p>Option 3: If there is no interest from concessioners within 12-18 months, then seek funding to stabilize buildings and structures.</p> <p>Option 4: If the structures deteriorate to an unacceptable level before stabilization funding can be found, then document and remove.</p> <p>Option 1: Historic Lease.</p> <p>Option 2: If historic leasing is not in place and there are no legitimate interested parties within 18-24 months, then consider assigning to a concessioner.</p> <p>Option 3: If there is no interest from concessioners within 12-18 months, then use for NPS administrative purposes.</p>
Fox-Henderson Property	<p>Option 1: Historic lease.</p> <p>Option 2: If historic leasing is not in place and there are no interested parties within 1 year, then consider assigning to a concessioner.</p> <p>Option 3: If there is no interest from concessioners within 12-18 months, then seek funding to stabilize buildings and structures.</p> <p>Option 4: If the structures deteriorate to an unacceptable level before stabilization funding can be found, then document and remove.</p>

Under the historic leasing option, properties will be offered for lease through a public bid process announced by public notice (in accordance with 36 CFR Part 18 and, specifically, 18.7). The park could enter directly into leases with non-profits (501[3] [c] status) or units of government without a bid process if the associated use will “contribute to the purposes and programs of the park.” The lease agreements will describe allowable uses of the property. Lessees will be required to pay at least “fair market value rent” (36 CFR 18.5). As required by NPS policy, the rent amount will be reassessed periodically to ensure payment of at least fair market value as the value of the property changes with structural rehabilitation, utility improvements, and other factors. Lessees will be responsible for repairs, rehabilitation, and utility improvements, and for ongoing and cyclic maintenance needs. Under each lease agreement, a preservation/maintenance plan will be developed in consultation with park staff. Lessees will also be required to develop vegetation management prescriptions, to include restoration of native plants and control of non-native invasive plants. Vegetation management prescriptions will be developed with park staff and will specify methods and objectives that are guided by best management practices. Lessees will not be permitted to sublet properties or buildings. Funds generated from the leasing program will be used to augment the preservation of historic properties at Lake McDonald and throughout the park. Lease agreements will not result in ownership of the buildings, the property, or any of the improvements.

Under the option to assign a property to a concessioner, the cabins may be assigned as part of an existing concessioner operation, or a new concession contract will be offered if for a new commercial use (such as leasing to park visitors). The concessioner will be responsible for needed rehabilitation and maintenance.

The stabilization option will preserve a building’s basic structural integrity and footprint on the landscape. Essential architectural form and design features will be preserved. Utility infrastructure and non-essential elements of the buildings will be allowed to deteriorate or will be removed if appropriate (e.g. carpet, window screening, interior paint). Basic weatherproofing, such as exterior finishes, will be maintained in functional condition, usually on a seven-year cycle (the typical timeframe needed to assure preservation of buildings). Roofing will be maintained and usually replaced every 15 years. Major rebuilding and stabilization (such as sill log replacements) will occur on a 16 to 20-year cycle. Stabilization will be funding dependent.

The option to document and remove structures will be based on unacceptable levels of deterioration and the potential for safety hazards. Documentation will be in accordance with Section 106 of the National Historic Preservation Act. The removal option is not included for the Wheeler property or the Moberly Guest Cabin due to their level of significance, and because the condition of the structures does not currently warrant removal. The method of removal for a given structure will be determined on a case-by-case basis, depending on factors such as location, access, type of construction, and potential for impacts to other resources. Following removal, the site will be restored with native vegetation.

Rationale

Alternative B was selected because it best meets the project purpose to:

- provide a strategy to fund the preservation and maintenance of the character-defining elements that qualify the properties for listing in the National Register of Historic Places, and
- establish guidance on the future use of the properties.

MITIGATION MEASURES

The selected alternative incorporates the mitigation measures listed in the EA and Appendix A of this document.

FINDING OF NO SIGNIFICANT IMPACT

CEQ regulations at 40 CFR Section 1508.27 identify ten criteria for determining whether the Selected Action will have a significant effect on the human environment. The NPS reviewed each of these criteria given the environmental impacts described in the EA and determined there will be no significant direct, indirect, or cumulative impacts under any of the criteria.

As described in the EA, the selected alternative has the potential for adverse impacts on historic structures and districts; vegetation, soils, and wetlands; wildlife; and grizzly bears. Because Alternative B includes a range of management options, there will also be a range of impacts depending on which option is in effect and the number of properties where management options are taking place. However, no potential for significant adverse impacts was identified. Impacts will be minimized through the mitigation measures described in the EA and Appendix A.

The adverse impacts described below do not include impacts at Kelly's Camp as originally included in the EA, since all NPS-owned structures at Kelly's Camp (and all but one of the NPS owned structures at the Wheeler property) were destroyed in the Howe Ridge Fire in August of 2018. The impacts described still include those at the Wheeler property, since the Burton K. Wheeler Cabin, the only building on the property to survive the fire, will still be managed according to the selected alternative.

Impacts include:

The removal of the Johnson-Graham Cabin will result in a permanent loss of a historic structure and contributing feature to the Glacier Park Villas Home Sites Historic District. Historic American Building Survey (HABS) and Historic American Landscape Survey (HALS) documentation will mitigate and minimize adverse impacts by recording features such as the architectural characteristics and configuration of the structure within the district. If the Fox-Henderson structures, buildings at Greve's Tourist Camp, and/or the Moberly House must be removed as a last resort, a permanent loss of historic resources will result. However, HABS and HALS documentation will be done on these structures as well, and the integrity of each historic district will be maintained because other structures will remain within each district that display the patterns of park history and/or embody distinctive characteristics of a type, period, or method of construction associated with recreational tourism around Lake McDonald. Other mitigations will also minimize impacts, including documentation in the park museum and archives and providing interpretation opportunities for properties that are removed. For properties that are not removed, repair and rehabilitation will be done according to the Secretary of the Interior's Standards for the Treatment of Historic Properties and an associated Historic Structure Report and Treatment Plan.

Vehicle access, temporary heavy equipment use, excavation, and other activities during structural rehabilitation or stabilization, utility installations/upgrades, or structure demolition and removal could cause vegetation trampling, soil compaction, and ground disturbance. A combined total of approximately 1.075 acres of soils and grasses will be disturbed if utilities are installed at each property. These activities will occur on previously disturbed land, no new infrastructure will be developed, and no large diameter trees will be removed. Leasing and concessioner and NPS use could increase vegetation trampling and soil compaction at each property as a result of human occupation and foot traffic. But most foot traffic will likely occur on previously disturbed ground, landscaped areas, or along the rocky lake shoreline. Such effects will also be limited to the cabin properties, which together comprise approximately seven acres or less, leaving approximately 200,000 acres of largely undeveloped land in

the Lake McDonald Valley unaffected. Restoration and vegetation management prescriptions will minimize or reverse adverse impacts, and weed control protocols will limit the spread of weeds. There will be no new adverse impacts to wetlands (present at the Greve's Tourist Camp, Moberly property, and Fox-Henderson property) as a result of leasing or concessioner or NPS administrative use. This is because sensitive areas will be identified and avoided through vegetation management prescriptions and/or best management practices. Wetlands could be impacted during repair of the building foundations, but less than 1/10th of an acre will be affected. Since the full scope of work is not yet known, the foundations will not be repaired until separate environmental review and compliance is done to address wetland impacts, including restoration. Impacts from the selected alternative will not affect vegetation species at the population level, since the species present exist throughout the Lake McDonald area; therefore, there will be no change to overall plant species composition and diversity.

Human occupation of the properties under historic leasing and/or concessioner and NPS administrative use may increase wildlife disturbance, displacement, and habituation. The intensity of impacts will increase if the properties are occupied during winter, since winter is a particularly sensitive time for wildlife (due to increased energetic demands, reduced vegetative shelter, etc.). Noise from construction-related activities during structural preservation, stabilization and maintenance will also have the potential to displace wildlife. Adverse impacts will not be substantially different from impacts that are already occurring, and will not affect wildlife species populations. This is because the selected action will take place in an already developed area with typically high levels of human activity, there will be no increase in overall habitat fragmentation around the lakeshore, and over 200,000 unaffected acres of backcountry surrounding the project area will remain available for wildlife to use for foraging, nesting/denning, shelter, and as travel corridors. Storage requirements for wildlife attractants will reduce the risk of negative wildlife-human encounters at the properties. Impacts during winter will be minimized by the continuation of winter road closures, thus retaining wildlife security along roadways. Construction-related noise will be temporary (estimated at approximately four weeks, depending on the size and condition of a given property and scale of the project), and will end once a project is complete. Adverse impacts during construction/demolition will be mitigated by timing such projects to avoid sensitive breeding, nesting, and denning periods.

Human occupation of the properties could disturb or displace grizzly bears travelling or foraging nearby (primarily due to noise, artificial light at nighttime, and vehicle traffic), and will also increase the potential for bears to become habituated, obtain unnatural foods, or be involved in a negative encounter with people. Similar impacts could occur during building stabilization or rehabilitation, utility installation/upgrades, or structure demolition and removal. Adverse impacts will not be noticeably different from those caused by existing levels of development, maintenance, and human activity. There will be no increase in the size of the existing development footprint, and approximately 200,000 acres of backcountry immediately surrounding Lake McDonald will remain unaffected. Adverse impacts will not change grizzly bear distribution because the area will remain under a Management Situation 3 designation, under which the presence of grizzly bears is actively discouraged. The potential for conflicts with bears will be reduced by the enforcement of attractant storage regulations and orientation on appropriate behavior in the presence of bears.

The National Historic Preservation Act (NHPA) of 1966, as amended (54 U.S.C. 300101, et seq.) requires all federal agencies to consider effects from any federal action on historic properties eligible for or listed in the National Register of Historic Places prior to initiating such actions. On June 3, 2010, Glacier National Park notified the Montana State Historic Preservation Officer (SHPO) of the project in accordance with 36 CFR 800. Follow up correspondence was sent in May 2011 and August 2015. The park also met annually with the SHPO on this project. Based on the analysis, the park's finding of effect

under Section 106 of the NHPA is “adverse effect” because one of the historic properties that contributes to the significance of a historic district will be demolished (the Johnson-Graham Cabin, part of Glacier Park Villas Home Sites Historic District). It is also suspected that inventory of the properties considered in this EA will identify intact archeological resources. Further inventory and determination of eligibility will be made prior to proceeding with any site-specific undertaking in accordance with NHPA Section 106. As site-specific plans are received for each of the properties, they will be shared with the SHPO in accordance with Section 106. The park notified the Advisory Council on Historic Preservation on January 31, 2018. The Council did not reply. A Memorandum of Agreement (MOA) to avoid, minimize and mitigate the adverse effects of removal of the Johnson-Graham Cabin was signed by the SHPO on March 25, 2019 (Appendix D of this FONSI).

Glacier National Park notified the Confederated Salish and Kootenai Tribes (CSKT) Tribal Historic Preservation Office (THPO) and Council members, and the Blackfeet THPO and Blackfeet Tribal Business Council on June 3, 2010, in accordance with 36 CFR800. Meetings were also held with the CSKT Tribal Historic Preservation Department on December 18, 2014, April 10, 2017, and March 18, 2019, and with John Murray, Blackfeet THPO, on March 12, 2015, July 28, 2017, and February 7, 2019. Neither the CSKT nor the Blackfeet Tribe raised concerns about the project.

In a biological assessment (BA) submitted to the US Fish and Wildlife Service (USFWS) in compliance with section 7 of the Endangered Species Act (ESA), the National Park Service determined that the selected alternative “may affect, but is not likely to adversely affect” grizzly bears. The National Park Service also determined that the selected alternative will have no effect on the bull trout or bull trout critical habitat, Canada lynx or Canada lynx critical habitat, wolverine, meltwater lednian stonefly, western glacier stonefly, water howellia, and Spalding’s catchfly. The USFWS concurred with the park’s determination on February 15, 2018.

There will be no significant impacts on public health, public safety, or unique characteristics of the region. 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 law.

CONCLUSION

As described above, the selected alternative does not constitute an action meeting the criteria that normally requires preparation of an environmental impact statement (EIS). The selected alternative will not have a significant effect on the human environment in accordance with Section 102(2)(c) of NEPA.

Based on the foregoing, it has been determined that an EIS is not required for this project and, thus, will not be prepared.

APPENDIX A: MITIGATION MEASURES

The following mitigation measures will be part of project implementation. These measures have been identified to minimize the degree and/or extent of adverse effects. The level of impacts has been determined assuming these mitigation measures will be implemented.

Historic Properties and Districts

- Any rehabilitation, repairs, or other work on historic structures will be in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties.
- Documentation to the standards of the Historic American Building Survey (HABS) and the Historic American Landscape Survey (HALS) will be conducted prior to the removal of a historic property.
- If a property is removed, opportunities for interpretation will be provided to document the historic role the property played.
- Lessees will not be permitted to sublet properties or plow roads.
- A Historic Structure Report and Treatment Plan will be developed for each property being rehabilitated. This will ensure repair and rehabilitation done to historic properties considered in the EA does not adversely affect a property's historic integrity.
- The park will consider placing artifacts (e.g. pictures) in the museum and archives to document historic structures and districts.

Archeology and Ethnographic Resources

- Further systematic archeological surveys will be conducted before any construction, structure removal, excavation, landscaping, or other activity involving ground disturbance to prevent the disturbance of any undiscovered cultural resources.
- Archeological monitoring will be required during any ground disturbance.
- Should construction unearth cultural resources, work will stop in the area of discovery and the park's Cultural Resources Specialist will be notified. Discovered resources will be evaluated for their potential eligibility for listing in the NRHP. Procedures will follow those outlined in 36 CFR 800, Protection of Historic Properties.
- All contractors and subcontractors will be informed of the penalties for collecting artifacts or intentionally damaging paleontological materials, archeological sites, or historic properties. Personnel will be educated about the need to protect any cultural resources encountered.

Water Resources and Wetlands

- Sewer and new or existing septic systems will meet Flathead County and NPS standards.
- To protect water quality, only herbicides approved by the National Park Service will be used. Application and use will be coordinated with the park's Integrated Pest Management coordinator.
- Leases will stipulate allowed shoreline uses to protect water resources and wetlands, e.g. no vegetation removal, no increase in footprint (boathouses, docks, or sheds), etc.
- Chemical ice melt and all other chemicals (such as fertilizers) that could adversely impact water on and/or adjacent to the properties will not be permitted.

Vegetation and Soils

- Best management practices will be followed to control non-native invasive plants under all management options. During structure removal, properties will be treated for non-native invasive plants beforehand. Disturbed areas will be restored with native vegetation.

- Only native plants or approved ornamental species (only if already present) will be maintained. When approved ornamental plants die, they will be replaced with native plants.
- During soil disturbance activities, topsoil will be protected and reused.

Wildlife, Threatened and Endangered Species, and State Species of Concern

- Consultation and planning with wildlife specialists will precede the removal of structures and buildings in order to identify any species concerns and additional mitigation measures, e.g. bat surveys.
- Surveys of bat and bird use of the structures and buildings will be conducted prior to any construction, removal, or rehabilitation.
- Construction, removal, or rehabilitation will be timed to mitigate impacts to wildlife (e.g. avoiding work during critical breeding or nesting periods and timing work to occur when bats are not present).
- Seasonal winter gate/road closures and requirements will remain in place pursuant to Glacier National Park Management Directive 7.3 for the protection of wildlife in winter. There will be no snow plowing or road improvements beyond current levels. Areas beyond closed gates will continue to be managed as trails (e.g. no motorized or mechanized transport, dogs, or other pets).
- Leases will specify guidelines regarding the presence and management of natural wildlife attractants (such as grasses, ornamental trees, and shrubs); guidelines will be specific to each property and will be designed to minimize the presence of such attractants, e.g. lessees will not be allowed to cut any timber nor remove any landscape features without prior approval.
- NPS sanitation and food storage requirements will apply to all properties and be strictly enforced. Proper means of refuse removal will be established in conjunction with park law enforcement and wildlife specialists. Satisfactory winter refuse removal from remote properties will be a stipulation of winter use.
- Buildings occupied by roosting bats will not be leased for human occupation until after repairs have been made to prevent bats from entering.
- Best management practices will be in place as necessary during building rehabilitation or demolition activities to prevent erosion and sediment reaching the lake that would affect bull trout and fish habitat. Revegetation of sites where buildings are removed will also be done to reduce the potential for erosion from surface water.

APPENDIX B: NON-IMPAIRMENT FINDING

The NPS Organic Act of 1916 directs the NPS 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 USC 100101). NPS Management Policies 2006, Section 1.4.4, explains the prohibition on impairment of park resources and values:

"While Congress has given the Service the 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 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."

An action constitutes impairment when its impacts "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 any park resource or value may constitute impairment, but an impact would be more likely to constitute an 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;
- key to the natural or cultural integrity of the park 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 of significance (NPS 2006, Section 1.4.5).

Fundamental resources and values for Glacier National Park are discussed in the 1999 General Management Plan and 2016 Foundation Plan. All resource topics carried forward for detailed analysis in the EA are considered necessary to fulfill specific purposes identified in the establishing legislation; are key to the natural or cultural integrity of the park; and/or are identified as a goal in relevant NPS planning documents. They include: historic structures and districts; vegetation, soils, and wetlands; wildlife; and grizzly bears.

Historic Structures and Districts

The selected alternative will result in the removal and loss of one historic structure, the Johnson-Graham Cabin. Other structures will only be removed as a final option at three other properties, and include buildings at Greve's Tourist Camp and the Fox-Henderson property, and the Moberly House. Removal of historic structures will result in an adverse effect to the historic structure and corresponding historic district. However, HABS and HALS documentation will mitigate and minimize negative impacts by recording features such as the architectural characteristics and configuration of the structures within a given historic district. Other mitigations will also minimize impacts, including documentation in the park museum and archives, providing interpretation opportunities for properties that are removed, and repairing and rehabilitating properties according to the Secretary of the Interior's Standards for the Treatment of Historic Properties and an associated Historic Structure Report and Treatment Plan. Furthermore, successful implementation of the historic leasing program will allow for the preservation of approximately 12 structures that contribute to the Wheeler Camp Historic District (the Burton K. Wheeler Cabin, the sole

remaining structure at the Wheeler property after the Howe Ridge Fire, still contributes to the historic district), Greve's Tourist Camp Historic District, Apgar's Glacier Park Cottage Sites Historic District, and Glacier Park Villas Sites Historic District, thus ensuring that the structures and districts remain listed in the National Register of Historic Places.

Vegetation, Soils, and Wetlands

The selected alternative will result in the disturbance of up to approximately 1.075 acres of soils and vegetation from the installation of utilities. Temporary disturbance to vegetation and soils could also occur at each property during structural rehabilitation, stabilization, or removal due to vehicle access, heavy equipment use, and other activities. Adverse impacts will not affect plant species at the population level because the disturbance will be localized to the properties and the species affected are present throughout the Lake McDonald area. No sensitive plants will be affected. Vegetation management prescriptions, restoration, and mitigation measures will minimize and in some cases reverse adverse impacts.

Wildlife

The selected alternative could adversely impact wildlife due to disturbance during construction periods (i.e. during structural repairs, rehabilitation, demolition, etc.) and from resumed use of the cabins. However, there will be no new infrastructure or development, and the project will occur in already developed areas with typically high levels of human activity. Therefore, impacts to wildlife are not expected to increase much beyond existing levels. Impacts will also not affect wildlife species at the population level. Mitigation measures, including attractant storage requirements, restricting construction activity to the least sensitive time periods, wildlife surveys prior to use or rehabilitation of buildings, and use of best management practices during rehabilitation or demolition activities will minimize the degree and/or extent of adverse effects.

Grizzly Bears

The selected alternative will cause little if any change to existing adverse impacts to grizzly bears, since the project will occur within already developed areas with typically high levels of human activity, and because grizzly bears are discouraged from using the project area (in accordance with the Management Situation 3 designation for developed areas, where grizzly habitat maintenance and improvement are not the highest management considerations, grizzly bear presence is actively discouraged, and any grizzly involved in a grizzly-human conflict is controlled). The risk to grizzly bears of human habituation or conflict will be low due to bear management and food and attractant storage requirements. Other mitigation measures, including restrictions on construction activity to the least sensitive time periods, restoration and revegetation of project sites, and maintaining seasonal winter gate closures will further minimize adverse impacts.

Conclusion

In conclusion, based on the preceding analysis and in consideration of the park's purpose and significance, it is the Superintendent's professional judgment that these resources will continue to be present for enjoyment by current and future generations. Therefore, implementation of the selected alternative will not constitute an impairment of the resources or values of Glacier National Park.

APPENDIX C: ERRATA SHEETS—TEXT CHANGES AND RESPONSES TO COMMENTS

The NPS defines substantive comments as those that 1) question the accuracy of the information in the EA, 2) question the adequacy of the environmental analysis, 3) present reasonable alternatives that were not presented in the EA, or 4) cause changes or revisions in the proposal.

Twenty-three of the fifty-one letters received during public review of the EA contained comments that were considered substantive or otherwise warranted a response; comments are addressed below. No comments warranted development of an additional alternative or reconsideration of alternatives that were considered but dismissed. Therefore, the alternatives remain as described in the EA, and no changes were made in the assessment of environmental consequences that increased the level of adverse impacts.

Text Changes

Bolded text signifies new text. Strikeout is used to show text that has been removed.

Page 4, paragraph 1, additional text added to Background

The National Park Service is a steward of both natural and cultural resources. The Organic Act of 1916 and the 1910 legislation establishing Glacier National Park direct the National Park Service to preserve and protect natural and cultural resources unimpaired for future generations. The NHPA, passed in 1966, requires federal agencies to take into account the effects of their actions on historic properties and provide the Advisory Council on Historic Preservation an opportunity to comment on those proposed actions. As the primary federal agency through which the NHPA is realized, the National Park Service is committed to the preservation of historic properties. NPS management of cultural resources as described in the 2016 NPS Management Policies includes “stewardship to ensure that cultural resources are preserved and protected, receive appropriate treatments (including maintenance) to achieve desired conditions, and are made available for public understanding and enjoyment.” With respect to historic properties on Lake McDonald, the 1999 General Management Plan states that properties in the Lake McDonald area will be “managed to preserve their historic values.”

Page 4, paragraph 2, additional text added to Background

Routine preservation was done at the Wheeler property in 2016 and 2017 during preservation training workshops with the Montana Preservation Alliance. Stabilization work was conducted at the Grisley Cabin in August 2017 and summer 2019. Periodic preservation maintenance was performed at Kelly’s Camp in 2016 and 2017 through a Memorandum of Understanding with The Kelly’s Camp Foundation, Inc. The work included replacing windows, roofing, support piers, stairs, and decking.

Page 13, an impact topic has been added under Impact Topics Dismissed from Further Analysis

Privately-Owned Land

Leasing the properties described in this EA and the associated human activity at each of the properties could affect adjacent land owners. Human activity could be visible to nearby property owners, create noise, and result in road traffic and dust. The amount of human activity at each property would vary depending on group size and other factors. Effects are expected to be minimal, however, for the following reasons: The Grisley property is within Apgar, an already developed area where activity levels would be consistent with existing levels and not noticeably different. The Fox-Henderson property is not near any existing private holdings. Forest screens the Moberly property from an adjacent private inholding. The Wheeler and Kelly’s Camp properties are relatively isolated and screened by forested areas and other vegetation, which would dampen noise, block dust, and screen visual intrusions. The Wheeler property is also not immediately adjacent to private land, but rather to NPS property (ranger station and comfort station). The Greve’s property is near a private landowner, but improving the

structures to remove safety hazards and potential havens for wildlife, such as skunks and mountain lions, would be a beneficial effect for the neighboring residence. In general, the uses proposed under the historic leasing program are consistent with former and existing uses of the properties, and with the expected level of human activity in a residential, developed area. Utility improvements, building rehabilitation and maintenance, and structural stabilization could also adversely affect adjacent landowners due to construction-related noise, equipment, and activity. These impacts would be temporary, however, anticipated to last only a few weeks at most for the majority of projects, and ceasing once a project is complete. Such projects would also not be notably different in scale or frequency than ongoing infrastructure improvements that are routinely underway in the project area and throughout the park. Therefore, impacts to privately-owned land in the project area would not be substantially different from existing conditions and are dismissed from further analysis.

Note: Forested areas and vegetative screening at Kelly’s Camp and the Wheeler property burned in the Howe Ridge Fire in August of 2018. Post-fire, the properties are no longer screened and are considerably more visible than they once were. As stated on p. 2 of this FONSI, the selected alternative does not include management of the NPS-owned structures that used to be present at Kelly’s Camp, nor of five NPS-owned structures that used to be present at the Wheeler property, since the buildings were lost in the fire. The Burton K. Wheeler Cabin at the Wheeler property will still be managed according to the ranked management options described in the EA. While vegetative screening has been lost at the property, the conclusions regarding impacts to adjacent landowners have not changed, since human activity in the area will still be consistent with former and existing uses (as explained above in the text change to p. 13 for impacts to privately-owned land).

Page 22, heading for Alternative B

Alternative B – Manage NPS-owned properties at Lake McDonald using an adaptive management approach **decision framework** (NPS Preferred)

Page 22, paragraph 3, Alternative B

If the first management option is not underway or cannot be implemented by the timeframes specified, **beginning at the time the lease is offered for public bidding**, second, third and fourth management options are triggered (Table 23).

Page 22, paragraph 4, Historic Leasing

The park could enter directly into leases with non-profits (501[3] [c] status) or units of government without a bid process if the associated use would “contribute to the purposes and programs of the park.” **Using a Memorandum of Understanding between the Glacier Conservancy, Glacier Institute, the Montana Preservation Alliance and the University of Montana, the Wheeler property has been recently used for educational gatherings, workshops, and meetings by park staff and these park partners. This was temporarily done to assure a presence at the property, perform needed preservation and allow for some use. Under Alternative B, offering historic leasing of the property to park partners and non-profits would likely be geared toward continued educational and conferencing purposes.**

Page 24, correction made to paragraph 1

Documentation (in accordance with Section 106 of the ~~National Register of Historic Places~~ **National Historic Preservation Act**)...

Page 24, paragraph 2

A structure slated for removal would be sold to an outside entity that would remove it from the park **(including possible relocation)**, remove the foundation, and clean up all debris.

Page 24, correction to paragraph 1

Documentation (in accordance with Section 106 of the National **Historic Preservation Act** Register of ~~Historic Places~~) and removal would be a fourth management option for the Moberly House, Fox-Henderson Cabin, and structures at Kelly's Camp, **and Greve's Tourist Camp, and the Grisley property**; the decision to remove a structure would be made after other management options have been exhausted, and would be based on unacceptable levels of deterioration and the potential for safety hazards. Removal is not included in the management options for the Wheeler property or the Moberly Guest House **Cabin** due to their level of significance. **Removal is not included as an option for the Grisley property because it is eligible for listing in the NRHP, and there would be little, if any, gain in terms of wildlife habitat or the restoration of natural conditions, since the property is within a developed area (the town of Apgar).** The condition of the **Moberly Guest Cabin and structures at the Wheeler and Grisley properties** also does not warrant consideration of removal at this time.

Page 25, Table 3, Alternative B, Ranked Options column for Wheeler Camp

Option 1: Historic lease to non-profit organization and or park partners **as an education and or conference center.**

Page 27, paragraph 2, Alternatives Considered and Dismissed

The National Park Service is a steward of both natural and cultural resources. The Organic Act of 1916 and the 1910 legislation establishing Glacier National Park direct the National Park Service to preserve and protect natural and cultural resources unimpaired for future generations. Section 106 of the NHPA, passed in 1966, requires federal agencies to ~~preserve historic properties, including historic structures, for present and future generations~~ **take into account the effects of their actions on historic properties and provide the Advisory Council on Historic Preservation an opportunity to comment on those proposed actions.**

Page 28, an alternative element added to Alternatives Considered and Dismissed

Include removal as a management option for the Wheeler and Grisley properties and the Moberly Guest Cabin.

The Wheeler property served as a summer residence during the significant period of Senator Burton K. Wheeler's life. According to the National Register, "at least three legislative bills were to a considerable degree, worked on in Glacier National Park: the Wheeler-Lee Act, an amendment to the Federal Trade Act; the Wheeler-Rayburn Act, and the Wheeler-Howard Act." It was Senator Wheeler together with Senator Walsh who helped gain appropriations to build the Going-to-the-Sun Road. Given the Wheeler property's value and significance, removing the buildings would cause too great an environmental impact.

The Grisley property is in a well-developed area (the town of Apgar) and is surrounded by adjacent developed property. There would be very little, if any, gain in terms of wildlife habitat or restoration of natural conditions to warrant removing the property, which is eligible for listing in the National Register of Historic Places.

Because the Moberly Guest House is in relatively good condition, repair and rehabilitation costs would still be feasible should historic leasing or assignment to a concessioner be unsuccessful. The purpose of this plan is to preserve the properties considered in the EA if possible. Therefore, since the Moberly Guest Cabin could still be preserved if other options are unsuccessful, to remove it would be contrary to the plan's purpose.

Therefore, removal as a management option for the Wheeler and Grisley properties and the Moberly Guest Cabin has been dismissed because it would cause too great an environmental impact and would contradict the plan's purpose to preserve the character-defining elements of the properties.

During the summers of 2016 and 2017, preservation trainings took place at the Wheeler Camp that included park staff, the Montana Preservation Alliance, Glacier National Park Conservancy, Glacier Institute, Vanishing Treasures, Xanterra staff, A&E Architects, students, and volunteers. The following work was done to protect and preserve the property:

- masonry repairs and stabilization at the rear stair stone walls;
- masonry repairs and weatherproofing at the brick chimney to deck level;
- masonry joint demolition and repointing of deteriorated joints up to roof level on the stone chimney;
- major masonry repairs, stabilization, and repointing on the stone chimney above roof level;
- wood restoration (scraping and oiling) on all permanent exterior shutters; and
- restoration of all upper windows (scraping, oiling, reglazing of loose panes of glass, replacement and reglazing of broken panes), all windows/doors on the front (south) elevation, and on the southernmost windows on side (east/west) elevations.

NPS Responses to Comments

Note: Several respondents expressed interest in leasing the properties and requested applications and/or more information about the program (such as prices). The park appreciates the interest and is maintaining a list of interested parties, but the historic leasing program has not yet been developed. Once the plan is approved and the leasing program is sufficiently developed to administer leasing, interested parties will be contacted. The fair market value for the properties will be determined and the properties will be offered for lease through a public bid process announced by public notice (in accordance with 36 CFR Part 18 and specifically, 18.7).

1. **Concern Statement:** How would terms of the leases, such as not allowing lessees to sublet the properties, be enforced?

Response: *The leases will be contractual agreements that require compliance with all terms and conditions, including prohibiting subletting or a similar arrangement. Lessees who do not adhere to the agreement, including all terms and conditions, will risk losing the lease. Therefore, there will be a strong incentive to adhere to the terms and conditions. A number of lease conditions will also be developed in consultation with park staff (such as vegetation restoration plans and building preservation plans). Park staff will, therefore, be aware of restoration/preservation goals and be able to determine if they are being met. More specific means of ensuring or enforcing compliance with lease terms and conditions are not identified in the EA because such details are not necessary to evaluate impacts to park resources.*

2. **Concern Statement:** A number of comments raised concerns about the cost of the program. Why didn't the EA include cost estimates for the plan, including condition assessments? Will the NPS do early structural analyses and, if so, how will that be paid for?

Response: *Under the preferred alternative, historic leasing is the primary option for all but one of the properties (Johnson-Graham) because it will fund the preservation of the properties as well as the administration of the program. Costs to administer the program, including costs of preliminary structural condition assessments, were not included in the EA because they do not need to be known in order to evaluate impacts to park resources from the preferred alternative. Additional conditions assessments will be conducted in the future, and funding for those assessments will be sought at*

that time. In some cases, depending on funding and the condition of a property, the park may undertake some repairs or improvements to a property prior to leasing (EA p.23).

- Concern Statement:** Several comments raised concern that leasing the properties would have no public benefit, but would only benefit the few potential leaseholders.

Response: *The National Park Service may permit the use of a historic property through a lease or cooperative agreement if the lease or cooperative agreement will ensure the property's preservation. By managing these publicly owned buildings to allow private use—sometimes exclusive private use—the properties will be preserved and the park will be able to maintain other historic properties with the income from the leased properties. Preservation of historic properties is considered a public benefit.*

- Concern Statement:** One comment suggested an annual drawing for stays of one to two weeks as an alternative means of making leases more available to the public instead of only the lease holders. Another comment suggested that a lottery based on pre-qualifications would be fairer than just leasing the properties to the highest bidder.

Response: *One to two week rentals or a drawing or lottery is not feasible because this approach would not generate the necessary funds to preserve the structures, which is integral to the purpose and need of the plan. The plan is designed to pay for the long-term preservation of the properties; otherwise, the properties are at risk of being lost.*

- Concern Statement:** The park's historic buildings should not be sold as lease properties because, as with other long-term lease agreements in Flathead County, the lease holders are required to pay property taxes, which are subject to increased tax assessments. These assessments are sometimes too high for local lease holders, or the leases cannot be sold, and/or the properties deteriorate from abandonment. Under this scenario, only the very wealthy will be able to afford to lease the properties considered in the EA.

Response: *This comment is referring to the cabin and home site leasing program with the Montana Department of Natural Resources and Conservation (DNRC). Under the DNRC program, participants lease the land, but own the structures and are responsible for property taxes on those structures. The DNRC program is not a historic leasing program, and the DNRC does not have jurisdiction over properties and buildings in Glacier National Park. The park's historic leasing program under this plan will be different; participants will only lease the property, and will not purchase or own the land or buildings. Therefore, participants will not be responsible for property taxes under the park's historic leasing program. Participants could be eligible for the Federal Historic Preservation Tax Incentives program, which encourages private sector investment in the rehabilitation and re-use of historic buildings. An income tax credit is available for the rehabilitation of historic, income-producing buildings that are determined by the Secretary of the Interior, through the National Park Service, to be "certified historic structures." The State Historic Preservation Offices and the National Park Service will review the rehabilitation work to ensure that it complies with the Secretary's Standards for Rehabilitation.*

- Concern Statement:** The park should just invest in rehabilitation/maintenance of the buildings and rent them out, possibly with the enlistment of a property manager.

Response: *There is a lack of funding for cyclical maintenance and specific rehabilitation and restoration projects for all of these structures around Lake McDonald. The park's historic resources (parkwide), numbering 397 historic buildings and structures and two cultural landscapes as of 2018, require regular maintenance and repairs. The park currently has a backlog of over \$22 million in deferred building maintenance, including work needed on structures essential to park operations (at the time the EA was prepared, this figure was approximately \$27 million, p. 12). The historic leasing option will be the best way to enable the preservation and maintenance of the buildings and the character-defining elements that qualify the properties for listing in the National Register of Historic Places. The lessees will be responsible for repairs, rehabilitation, utility improvements, and ongoing and cyclic maintenance. Renting, on the other hand, would not enable preservation of the properties because renters would not be responsible for repairs and maintenance, etc. The leasing program will also reinvest all net income to fund historic preservation and capital improvements of the historic properties and infrastructure.*

7. **Concern Statement:** The NPS should pursue public donations as a way to generate funding for the restoration and maintenance of the cabins.

Response: *Relying on donations would not be a sustainable means of funding the preservation of the properties, since long-term funding commitments could not be contractually secured, and donated income would likely be highly variable from year to year and extremely difficult to predict. Historic leasing is a more sustainable approach, since leases could potentially be secured for multiple years, and because contractual agreements will ensure compliance with requirements for repairs, rehabilitation, and maintenance.*

8. **Concern Statement:** The EA did not provide background regarding the nearly 100 years of private property (inholding) acquisition by Glacier National Park.

Response: *The EA states on p. 2 that the NPS has purchased or acquired privately owned properties, and discusses properties relevant to the Lake McDonald area. A more detailed background on this history throughout the park is not necessary to evaluate impacts from the alternatives to park resources in the project area.*

9. **Concern Statement:** Several comments claimed that the park acquired the properties with the intention or in agreement with the previous landowners to remove the cabins and restore the land to its original, natural condition, as was done with the Roberts Cabin.

Response: *The Roberts Cabin, a contributing resource to the Glacier Park Villa Sites Historic District, was removed in 2008 for public health and safety reasons, and to increase undeveloped land along the lake for wildlife habitat. The Roberts Cabin was also removed to honor an unwritten agreement made at the time of purchase with the previous landowner to remove the building ("Roberts Cabin Removal Environmental Assessment/Assessment of Effect" and Finding of No Significant Impact, signed on October 24, 2007). The previous owner was still alive at the time and asked the park to remove the Roberts Cabin, citing her personal knowledge that removal was part of the agreement when they sold it to the park. The park has investigated claims that similar agreements were made for the cabins under consideration in the EA, but there is no evidence to corroborate this.*

10. **Concern Statement:** The EA does not thoroughly explore ways to remove the cabins and still comply with the National Historic Preservation Act. The park could use wayside and visitor center exhibits with photographs to describe the locations and importance of the historic districts.

Response: *This alternative was considered but dismissed on p. 28 of the EA, "Rehabilitate and interpret the history of a sample of the cabins from different eras, and remove the rest."*

11. **Concern Statement:** The EA does not mention the park's Land Protection Plan, which documents the original intent to return purchased properties at Lake McDonald to natural conditions.

Response: *The Glacier National Park Land Protection Plan was prepared in 1985, when these cabins were not historic. The direction it set is out of date with current conditions and, therefore, does not apply to the cabins that have been designated as historic since 1985, such as those identified in the EA. The 1999 General Management Plan states that historic properties in the Lake McDonald area will be "managed to preserve their historic values," and the selected action reflects this direction.*

12. **Concern Statement:** Visible impacts should not have been dismissed.

Response: *Impacts to visual resources were dismissed (pp. 19-20 of the EA) because vistas and scenic landscapes will remain essentially unchanged, or effects will be noticeable only in the immediate vicinity of a given property. Since there will be no or only negligible changes to visual resources, the impacts do not warrant detailed analysis.*

13. **Concern Statement:** Who will oversee the plans and work at each site? What are the timeframes for the review and bidding process, including the starting point? What if a bid is withdrawn? Will the NPS do early structural analyses and, if so, how will the analyses be paid for?

Response: *On p. 22, the EA states that the park will establish a program to manage the leasing program. On p. 23, the EA states that a preservation/maintenance plan for each cabin will be developed in consultation with park staff. Therefore, park staff will be responsible for overseeing plans and work at each cabin. The timeframes for the ranked options are shown in Table 3 of the EA (and Table 1 of this FONSI), and will begin at the time the lease is offered for public bidding. Text has been added to p. 22 of the EA to clarify this (and to correct the notation of the table number). If a bid is withdrawn, the timeframes under which other options will be pursued as stated in Table 3 will still apply, unless there remains a legitimate interested party. The park has already done preliminary structural condition assessments. Additional assessments will be conducted in the future; funding for those assessments will be sought at that time.*

14. **Concern Statement:** Private ownership should not occur on public lands.

Response: *The historic leasing program under consideration in the EA does not authorize the selling of NPS lands. Cabin properties will be leased under a historic leasing program. For some cabins, removal is a final option. Under this scenario, the cabin will be sold to an outside entity and removed; the land will remain under NPS ownership.*

15. **Concern Statement:** The EA gives all the properties equal importance, and suggests that the positive benefits of removing the cabins would be equally negligible at each site. The plan should include some prioritization based on different impacts (such as effects from the Moberly Cabin to wetlands, visual resources, and overall effects from the presence of residents, for example).

Response: *The plan includes prioritization by means of the ranked management options, which differ for each site. Because the purpose of the plan is to preserve NRHP-listed properties if possible, the condition of each structure and feasibility of long-term preservation are the primary factors in determining what actions should be taken at each site and how they should be ranked.*

16. **Concern Statement:** One comment claimed that the work done at the Greve's Cabin following a windstorm was a pre-decisional action.

Response: *The work done at the Greve's Cabin was an action to protect the structure in response to a tree falling on it during a wind storm and penetrating the roof. Such preservation of damaged NRHP listed structures is routine. The action was not pre-decisional with regard to this plan, because it does not preclude other options, including removal of the structure, which is listed in Table 3 (p. 25 of the EA) as a 3rd option for the property if options 1 and 2 are not successful.*

17. **Concern Statement:** Some comments mentioned the burden of fire protection that comes with keeping the properties.

Response: *There will be no additional burden as the park already provides wildland and structural fire protection to all park infrastructure. No additional protection will be provided whether the building is operated by the NPS or a lessee.*

18. **Concern Statement:** Physically relocating the buildings is not included as part of the option to remove them.

Response: *A text change has been made to p. 24 of the EA, under "Documentation and Removal," to clarify that removed buildings could be relocated.*

19. **Concern Statement:** The Wheeler property should not be leased to a for-profit organization, such as a park concessioner.

Response: *The ranked management options for the Wheeler property are to 1) lease it to a non-profit or other park partner; 2) lease the property for private purposes; or 3) use the property for NPS administrative purposes (see Table 3 in EA, p. 25). Assignment to a concessioner is not among the ranked management options for this property.*

20. **Concern Statement:** Leasing the Greve's Tourist Camp, which is isolated from other developments and infrequently used, would redevelop a wild and essentially natural area.

Response: *Greve's Tourist Camp is directly adjacent to an occupied area. There will be no new development or increased footprint under the historic leasing option.*

21. **Concern Statement:** Several comments raised concerns regarding the septic systems and whether they would meet standards to prevent impacts to Lake McDonald's water quality.

Response: *The EA describes impacts to water quality on p. 20, under "Impact Topics Dismissed from Further Analysis, Water Resources and Floodplains." Septic system upgrades are included under "Mitigation Measures," p. 26.*

22. **Concern Statement:** Work has already occurred at the Wheeler Camp, and the buildings are already being used for meetings. Was the public involved when the decision was made to change the use of the property, which used to be an abandoned summer home? Did the Glacier Conservancy participate in these decisions, and was this legal under the Federal Advisory Committee Act (FACA)? What is the park's plan for the property, including the buildings and facilities?

Response: *The Wheeler property was never an abandoned summer home, and the Burton K. Wheeler Cabin is in relatively good condition (the rest of the structures on the Wheeler property were lost in the Howe Ridge Fire in the summer of 2018). The NPS took possession when the family left. Since that time, the property has been maintained according to the National Historic Preservation Act and NPS Management Policy 5.3, Cultural Resource Management Stewardship, for historic structures listed on the National Register. Work done at the Wheeler property preserved existing features and did not result in any changes to the structures. This type of preservation of NRHP listed structures is routine. The purpose of this EA is to evaluate the impacts of an overall historic leasing program for the management of multiple properties and, in some cases, the stabilization or removal of historic structures. The occupancy and use of a single NPS-owned property falls under the 2015 NPS Handbook for implementing NEPA, Section 3.2 (E) "Routine and continuing government business..." Preservation of existing features and using the property for meetings also does not preclude any of the options identified for the property as part of the preferred alternative. Details regarding the buildings and facility issues will be determined at a later time, depending on whether historic leasing is successful. See also text change on pages 4, 22, and 31.*

Through a grant, the Glacier National Park Conservancy provided the funding for historic preservation training at the Wheeler Camp. No decisions were made regarding the usage of the property; therefore, FACA did not apply. This EA is part of the public process to determine how the park will manage this historic property into the future.

23. **Concern Statement:** Other reasonable alternatives are not analyzed in the EA. Only two alternatives are evaluated, but other alternatives should be analyzed separately. Specifically, single-family residential use should be considered and analyzed as a separate alternative, because impacts from single-family residential use are totally different than impacts from administrative or commercial use.

Response: *Under DOI NEPA regulations, 43 CFR Part 46, the range of alternatives for an EA or EIS includes not only alternatives carried forward for detailed analysis, but also alternatives considered but eliminated from detailed analysis (46.420(c)). The range of alternatives in the EA includes four alternatives, two of which were carried forward for analysis (pp. 22-27), and two that were dismissed (pp. 27-28). The preferred alternative opens bidding for available properties to everyone, including single families. Therefore, single-family residential use was considered in the EA as part of the preferred alternative.*

Impacts from single-family residential use will not be notably different than impacts from NPS administrative use, assignment to a concessioner, or use by park partners or non-profit organizations (assuming these are the entities the commenter is characterizing as having commercial uses). This is because measures to protect park resources under a leasing program will be in place regardless of who the lessee is. Buildings will be preserved, vegetation management prescriptions will be in place, vegetative screening will be preserved, wildlife attractant storage requirements will be required and enforced, septic and sewer systems will be brought to standard,

and no new infrastructure will be developed (see “Environmental Consequences” section of the EA). The amount of disturbed acreage to install utilities will be the same (EA p. 39), and foot traffic is most likely to occur on previously disturbed ground or landscaped areas, regardless of who is occupying the property. Other listed mitigation measures listed in the EA on pp. 26-27 will also be in place and will not change based on who occupies the property.

24. **Concern Statement:** Commercial, non-profit, or administrative uses would destroy the properties’ history from loss of the residential quality.

Response: *Using the properties for non-residential purposes will not destroy their history. As stated in the EA (p. 35), the visual, physical evidence of early recreational tourism at Lake McDonald and the significance of the historic districts to which they contribute will be retained through the preservation of the structures. For years, many historic buildings in the park have been used and occupied in a manner that is different from how they were historically used and occupied (e.g. ranger residences used as office space). This has not diminished the structures’ historic significance nor changed their eligibility for listing in the NRHP. Adaptive re use of historic structures is encouraged by NHPA to preserve them.*

25. **Concern Statement:** Given the amount of deferred maintenance the park is facing, the plan needs to generate the most money possible. By not opening the Wheeler Camp to bidding, the NPS is missing an opportunity to generate the most funds.

Response: *Park partners and non-profit organizations will be required to pay at least fair market value rent (36 CFR 18.5) (p. 22 of the EA). The possible loss in revenue opportunities from leasing the Wheeler property to park partners or non-profit organizations rather than accepting the highest bid on the private market will be offset by contributions from those organizations to the purposes and programs of the park. 36 CFR Part 18, Section 18.9 allows the NPS to enter into leases with non-profit organizations (501[3][c] status) without a bid process if the associated use would “contribute to the purposes and programs of the park.” The follow-up option to use the Wheeler property (and others) for NPS administrative purposes if historic leasing is not successful is also economically sound because using existing structures will, in many instances, be less expensive than constructing additional buildings to meet NPS administrative needs.*

26. **Concern Statement:** Using the Wheeler Property for educational and retreat purposes should be analyzed separately in the EA or in a separate EA or EIS since plans for the property are already established (per various media reports in 2014, 2016, 2017, and 2018), including use as an educational and retreat center. The EA does not disclose these plans, nor does it analyze the impacts.

Response: *Text changes have been added to the EA on p. 4 and p. 31 to include a summary of the preservation of buildings at the Wheeler property in 2016 and 2017. A text change has also been added to p. 22 to include background information on how the Wheeler property has been used to date, and to clarify that offering historic leasing of the property to park partners and non-profits will likely be geared toward continued educational and conferencing purposes.*

The Wheeler property does not need to be analyzed separately, because previous use of the structures did not pre-determine the property’s use ahead of the EA; i.e. previous use did not cause changes to the property that preclude it from consideration of the alternatives. While the EA did not

state that park partners and non-profit organizations may be holding meetings and educational assemblies, it clearly states that the preferred option is to lease to these entities. Separate analysis of the Wheeler property is also not necessary because there will be no notable change in impacts to park resources, regardless of whether it is leased to a private party or to park partners and non-profit organizations. (See also the response to Concern Statement 22).

27. **Concern Statement:** The EA states that Alternative B, the preferred alternative, would “manage NPS-owned properties at Lake McDonald using an adaptive management approach.” Adaptive management is inappropriate for the Wheeler Property since the park already has specific plans. In the 2015 NPS NEPA Handbook, adaptive management is described as “most appropriate in situations where there are key uncertainties about the long-term implications of management actions” and “is less appropriate in situations where the impacts of management actions are relatively certain.” The adaptive management approach should not be used to analyze impacts for the Wheeler Property, because future uses of the property are not uncertain.

***Response:** A text change has been made to p. 22 of the EA to clarify that the plan is not an “adaptive management” plan, but rather utilizes an adaptive decision framework. An adaptive decision framework is appropriate for the Wheeler property because there remains uncertainty as to whether historic leases can be secured. While the clearly identified outcome is to secure a historic lease, preferably with a park partner or non-profit organization, this is by no means an assured outcome. It is also necessary to analyze the Wheeler property within the adaptive decision framework because other management options need to be identified and disclosed to the public should leasing to park partners and non-profit organizations not succeed. Leasing the property to park partners or a non-profit organization will not affect the property in any way that will preclude other options.*

28. **Concern Statement:** The affected environment is not sufficiently described in the EA, and impacts are not adequately analyzed. Specifically, the affected environment and impacts analysis do not include privately-owned property adjacent to or near the subject properties. The EA concludes that impacts from use of the properties would be of little consequence given that 2.5 million people visit the park annually (EA p. 14). This incorrectly assumes that all 2.5 million visitors visit the subject properties. The EA does not explain where 2.5 million visitors go, and it is unlikely that many visit the north end of Lake McDonald. Increased human activity on the north end of the lake at the Wheeler property and Kelly’s Camp would negatively affect nearby private landowners due to dust, traffic, noise, and visibility. Parking and other improvements will also likely be necessary to use the Wheeler property for educational and retreat purposes. Such impacts to local neighborhoods need to be analyzed. On p. 28, the EA recognizes that specific types of human activity in the vicinity of privately-owned land would be “inappropriate because the additional human activity could infringe on the privacy of nearby landowners.” But the EA does not analyze the impacts.

***Response:** A text change has been added to the EA under “Impact Topics Dismissed from Further Analysis” (pp. 13-21) addressing impacts to private land but dismissing the topic from detailed analysis. No additional parking or additional infrastructure will be developed at the properties under the historic leasing program (as stated on pp. 19, 38, and 43 of the EA). Due to the loss of most of the buildings at the Wheeler property during the 2018 Howe Ridge Fire, the park may consider replacing some of the infrastructure at Wheeler, in which case additional environmental review and compliance would be done as appropriate.*

The references to 2.5 million visitors on p. 14 of the EA is being taken out of context from the section in the EA dismissing socioeconomics from detailed analysis. Socioeconomics was dismissed because, as stated in the EA, any increase in visitor use from leasing the subject properties will result in no appreciable change to local businesses and concessions contracts.

The reference from p. 28 of the EA is also taken out of context from a dismissed alternative to rehabilitate and interpret some cabins and remove the rest. The statement reads: "Interpretation of cabins closely surrounded by private land would be inappropriate" because it would require the development of additional infrastructure, including parking areas. Leasing the cabins will not result in the same effects to adjacent landowners as would interpretation, because no new developments are planned under the leasing program, and because leasing will not attract visitor traffic. Interpreting the sites would turn them into an attraction, which could result in visitors coming and going throughout the day and at any hour, presenting a greater potential to adversely affect adjacent landowners than long-term leases to single entities. Lessees will have the opportunity to become neighbors with existing landowners, as within any other residential community, while interpreting the sites would likely result in the frequent presence of visitors.

29. **Concern Statement:** While the EA states that future analysis would be done once the scope of work is known for building and vegetation restoration, it does not stipulate the analysis of impacts once the future use of the property is known. By including historic leases, use by concessioners and park partners, and NPS administrative use, the preferred alternative includes a potentially wide range of uses. Some of these uses would cause a much greater impact than others on nearby or adjacent properties, but the EA does not analyze effects of these uses to neighboring properties. The EA also does not limit inappropriate uses.

***Response:** The future use of the properties will be one or more of the management options described for Alternative B, all of which are analyzed in the EA. Under the leasing option, the properties will be occupied. Leasing to a private party, a non-profit group, a park partner, concessioner staff, or using the structures for NPS administrative purposes will all result in occupancy of the properties. Options to stabilize or document and remove the structures broadens the range of uses, and these actions are analyzed in the EA. To attempt to evaluate every way occupants will use the properties would be highly speculative, and is not central to the proposal, of critical importance, or necessary to determine whether there will be significant environmental effects. A text change has been added to "Impact Topics Dismissed from Further Analysis" (pp. 13-21) addressing impacts to private land but dismissing the topic from detailed analysis.*

The mitigation measures on pp. 26-27 of the EA prohibit several uses (such as subletting the properties or plowing closed roads). As stated on p. 22 of the EA, the lease agreements will describe allowable uses of a given property, and will be specific to each site. Detailed, site-specific stipulations can be most effectively identified for each property at the time of leasing, and this level of detail is not necessary in the EA in order to evaluate impacts to park resources.

30. **Concern Statement:** While the EA includes administrative space as a management option, it does not state how much administrative space is currently available at the park, nor what future needs may be.

***Response:** Administrative space needs vary according to work plans, staffing, and projects. The EA did not include a discussion of current administrative space because it is not necessary for the evaluation of impacts from the preferred alternative to park resources, and because NEPA*

documents should focus on important environmental issues and avoid “amassing needless detail” (40 CFR, 1500.1(b)). The analysis of impacts includes the effects of NPS administrative use.

31. **Concern Statement:** The EA states on p. 27 that the National Historic Preservation Act “requires federal agencies to preserve historic properties.” This statement is incorrect. Under the NHPA, federal agencies are required to consider effects on historic properties and provide the Advisory Council on Historic Preservation with an opportunity to comment.

Response: *A text change has been made to page 27 of the EA to correct this error.*

32. **Concern Statement:** The EA does not give a compelling reason why buildings at the Wheeler property or Greve’s Tourist Camp could not be removed. The EA mentions the political career of Burton K. Wheeler, but it does not explain why the buildings cannot be removed.

Response: *The removal of the Greve’s Tourist Camp is a final option under Alternative B (see Table 3 in EA, p. 25). As for Wheeler Camp, removal is not included as an option in the preferred alternative because, given the property’s value and significance, its removal would be too great an environmental impact. The property served as a summer residence during the significant period of Senator Burton K. Wheeler’s life. According to the National Register, “at least three legislative bills were to a considerable degree, worked on in Glacier National Park: the Wheeler-Lee Act, an amendment to the Federal Trade Act; the Wheeler-Rayburn Act, and the Wheeler-Howard Act.” It was Senator Wheeler together with Senator Walsh who helped gain appropriations to build the Going-to-the-Sun Road. An alternative element has been added to the EA under “Alternatives Considered but Dismissed” describing the rationale for why removal was not included at three of the properties, including the Wheeler and Grisley properties and the Moberly Guest Cabin (see Text Changes, p. 28).*

33. **Concern Statement:** One comment suggested issuing leases to non-profit organizations as Option 1 for all properties, including the Johnson-Graham Cabin. Some comments suggested additional partners to consider when leasing to non-profits, including the Hockaday Museum of Art and Boy Scouts of America.

Response: *Any non-profit organization can bid on leases that are open to public bidding.*

Appendix D: Memorandum of Agreement (MOA)

**MOA between Glacier National Park
and the Montana State Historic Preservation Officer**



MEMORANDUM OF AGREEMENT

BETWEEN GLACIER NATIONAL PARK and

THE MONTANA STATE HISTORIC PRESERVATION OFFICER

**REGARDING DEMOLITION OF JOHNSON-GRAHAM CABIN WITHIN
THE GLACIER PARK VILLAS HISTORIC DISTRICT (B1302),**

GLACIER NATIONAL PARK, FLATHEAD COUNTY, MONTANA

WHEREAS the National Park Service, Glacier National Park (Park) proposes to remove the Johnson-Graham Cabin (Building 1302) due to extensive deterioration and its threat to human health and safety; and

WHEREAS the Park has defined the undertaking's area of potential effect (APE) as the Glacier Park Villas Historic District, Johnson-Graham Cabin (Building 1302 Lot 1 Block 17), in Glacier National Park, Montana; and

WHEREAS the Park has determined that the undertaking will have an adverse effect on the Glacier Park Villas Historic District and the contributing building known as Johnson-Graham Cabin (B1302), which has been determined eligible for listing in the National Register of Historic Places; and

WHEREAS the Park has consulted with the Montana State Historic Preservation Officer (SHPO) pursuant to Section 106 of the National Historic Preservation Act (54 U.S.C. § 300101) and its implementing regulations, "Protection of Historic Properties" (36 CFR § 800); and

WHEREAS the Park notified the Advisory Council on Historic Preservation (Council) in a letter dated January 31, 2018 to determine its participation pursuant to Section 106 of the National Historic Preservation Act (54 U.S.C. § 300101) and its implementing regulations, "Protection of Historic Properties" (36 CFR § 800), and the Council did not reply; and

WHEREAS the Park notified the Confederated Salish and Kootenai Tribes, Tribal Historic Preservation Officer in a letter dated June 3, 2010; with subsequent meetings on December 18, 2014, April 10, 2017 to determine its participation pursuant to Section 106 of the National Historic Preservation Act (54 U.S.C. § 300101) and its implementing regulations, "Protection of Historic Properties" (36 CFR § 800), and the tribe did not express any concerns on the proposed actions; and

WHEREAS the Park notified the Blackfeet Nation, Tribal Historic Preservation Officer in a letter dated June 3, 2010; with subsequent meetings on March 12, 2015, and July 18, 2017 to determine its participation pursuant to Section 106 of the National Historic Preservation Act (54 U.S.C. § 300101) and its implementing regulations, "Protection of Historic Properties" (36 CFR § 800), and the tribe did not express any concerns on the proposed actions; and

WHEREAS the Park notified the public through Planning, Environment and Public Comment (PEPC) website and a scoping brochure in July 2010 to determine interest and participation pursuant to Section 106 of the National Historic Preservation Act (54 U.S.C. § 300101) and its implementing regulations, "Protection of Historic Properties" (36 CFR § 800), Public scoping meeting was held on August 25, 2010. Follow up

newsletters were sent to interested parties in May 2011 and August 2015. Forty-three comments were received none of which specifically concerned the Johnson-Graham Cabin; and

WHEREAS the Lake McDonald Properties Management Plan Environmental Assessment seeks opportunities to maintain and restore Park owned cabins located around Lake McDonald through historic leasing, or concessions to preserve historic properties under federal stewardship; and

WHEREAS the Johnson-Graham cabin is identified within the Lake McDonald Properties Management Plan Environmental Assessment, calling for its removal. The property was acquired by the park in 1975. The terms of the acquisition allowed reserved uses through 2007. Maintenance of the property was retained by the former owners per the terms of reserved use. NPS, in full stewardship of the building and grounds in 2008, reported the building in poor condition; and

NOW, THEREFORE; the Park and the SHPO agree that the undertaking will be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties.

STIPULATIONS

The Park shall ensure that the following measures are carried out:

1) MITIGATION

a) Per the consideration listed in the Lake McDonald Properties Management Plan Environmental Assessment, Documentation to the standards of the Historic American Building Survey (HABS) and the Historic American Landscape Survey (HALS) will be conducted prior to the removal of this historic property. This property does not currently have this level of documentation and funding for documentation is not secure.

b) Per the consideration listed in the Lake McDonald Properties Management Plan Environmental Assessment, interpretation will be provided about the Glacier Park Villas Historic District as an overall holistic approach to addressing the removal of a historic structure. This will include a) online video and b) summer presentations at the Lake McDonald Lodge to document the historic roles the property played as part of the greater Recreational Camps on Lake McDonald. SHPO will have the opportunity to view text and images of the video. The video and presentations will help to contribute to public understanding of the importance of homesteads around the lake, recreational camp development, and rustic camp architecture. Due to seasonality of staff, draft text would be completed in summer 2020 and video completed in summer 2021.

2) DURATION

This MOA will be null and void if its terms are not carried out within five (5) years from the date of its execution. Prior to such time, the Park may consult with the SHPO to reconsider the terms of the MOA and amend it in accordance with Stipulation 5.

3) ANNUAL REPORTING

The park will provide an update of the actions carried out pursuant to this MOA in an annual report (typically January). The reporting period shall be the Fiscal Year from October 1 to September 30. The annual report shall be distributed to consulting parties to this MOA.

4) DISPUTE RESOLUTION

Should the SHPO object at any time to any actions proposed or the manner in which the terms of this MOA are implemented, the Park shall consult with the SHPO to resolve the objection. If the Park determines that such objection cannot be resolved, the Park will:

A. Forward all documentation relevant to the dispute, including the Park's proposed resolution, to the Council. The Council shall provide the Park with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, the Park shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the Council and the SHPO, and provide them with a copy of this written response. The park will then proceed according to its final decision.

B. If the Council does not provide its advice regarding the dispute within the thirty (30) day time period, the Park may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, the Park shall prepare a written response that takes into account any timely comments regarding the dispute from the SHPO to the MOA, and provide them and the Council with a copy of such written response.

C. The Park's responsibility to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute remain unchanged.

5) AMENDMENTS

This MOA may be amended when such an amendment is agreed to in writing by all signatories. The amendment will be effective on the date a copy signed by all of the signatories is filed with the Council.

6) TERMINATION

If any signatory to this MOA determines that its terms will not or cannot be carried out, that party shall immediately consult with the other party to attempt to develop an amendment. If within thirty (30) days (or another time period agreed to by all signatories) an amendment cannot be reached, any signatory may terminate the MOA upon written notification to the other signatories.

Once the MOA is terminated, and prior to work continuing on the undertaking, the Park must either (a) execute an MOA pursuant to 36 CFR § 800.6 or (b) request, take into account, and respond to the comments of the Council under 36 CFR § 800.7. The Park shall notify the signatories as to the course of action it will pursue.

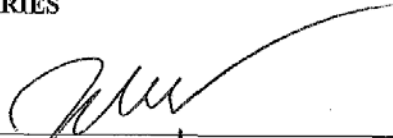
7) AGREEMENT CONTACTS

For Glacier National Park: Jeff Mow, Superintendent, Glacier National Park, P.O. Box 128, West Glacier, Montana 59936. Phone: (406) 888-7821.

For the Montana State Historic Preservation Office: Mark Baumler, Ph.D., Montana State Historic Preservation Office, P.O. Box 201202, Helena, Montana 59620. Phone: (406) 444-7715.

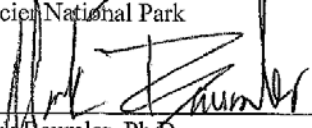
EXECUTION OF THIS MEMORANDUM OF AGREEMENT by the Park and SHPO and implementation of its terms, evidences that the Park has afforded the SHPO and the Council an opportunity to comment on the proposed removal of Johnson-Graham Cabin (building 1302) and its effect on the historic Glacier Park Villas Historic District, and that the Park has taken into account the effect of the undertaking on historic properties.

SIGNATORIES



Jeff Mow, Superintendent
Glacier National Park

Date 2/28/2017



Mark Bauml, Ph.D.
Montana State Historic Preservation Officer

Date 3/25/2017