

**ENVIRONMENTAL ASSESSMENT
FOR A
NORTHWEST ARCTIC HERITAGE CENTER
IN KOTZEBUE, ALASKA**

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Prepared By

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Western Arctic Parklands

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1.0 Purpose and Need

The National Park Service (NPS) is considering the development of a Northwest Arctic Heritage Center on a 0.75-acre site in Kotzebue, Alaska (Photograph 1). Western Arctic Parklands (WEAR) and the Northwest Arctic Native Association (NANA) are in the planning and design phase for a Heritage Center in Kotzebue, Alaska. The NPS and NANA believe that such a project will meet the following objectives:

- Provide opportunities for visitors and local residents to make personal connections to the meanings and significance of the natural and cultural resources of WEAR and the surrounding Northwest Arctic area through interpretation, orientation, information, trip planning and audio-visual programs.
- Improve communications and interactions with and within the community by reinforcing cultural values and traditions, supporting local arts and crafts, and promoting intergenerational teaching of dance, traditions and values.
- Support tourism, the sustainable development plans of Northwest Alaska, and provide employment and economic opportunities for local residents.
- Bring NPS, NANA and other partners together for more effective and economical use of resources and staff.
- Create a facility that is adaptive to multiple functions and conditions, durable, energy efficient and in keeping with arctic motifs.



Photograph 1: View of Proposed Site

to comply with section 1306 of the 1980 Alaska National Interest Lands Conservation Act (ANILCA). Section 1306 authorizes the Secretary of the Interior and federal agencies to attempt

The purpose of this project would be to design and construct visitor and administrative facilities and associated parking that meets the current and future needs of the park and its partners, the visiting public and local communities. These needs include providing orientation, information and trip planning to visitors, environmental and cultural educational opportunities for local residents and nearby communities and administrative facilities to enhance park operations. These needs are not being adequately met by current facilities.

1.1 Background:

The 1986 General Management Plan (GMP) for Cape Krusenstern National Monument called for the construction of several new NPS facilities in Kotzebue, Alaska. They included a visitor contact facility, a museum, administrative offices and equipment storage. When considering new development, the 1986 GMP encouraged the NPS

to locate sites and facilities on Native lands in the vicinity of the park unit to the extent practicable and desirable. Furthermore, the GMP identified NANA as one of several possible cooperators in funding the construction and operation of a museum in Kotzebue. The GMP also stated that consideration would be given to combining the NPS visitor contact station and the museum into a single building in order to lower construction, maintenance and operational costs and offer a single visitor destination. Towards this end, in 1998, NPS and NANA entered into a formal cooperative agreement pursuant to which the parties developed a planning document for a joint visitor center and natural and cultural museum in Kotzebue (WEAR Visitor and Cultural Center Proposal, 2000). The project, as authorized by the cooperative agreement, was analyzed through the completion of a planning study and its proposed use evaluated under Section 1306 of ANILCA. In that study certain objectives for the project were identified and several options for addressing them considered. Subsequent to that initial planning document NPS and NANA entered into a General Agreement (GA rev. 7/10/01) and a Project Agreement (PA rev. 11/1/01) to carry forward the planning and pre-design phases of a Northwest Arctic Heritage Center in Kotzebue, Alaska.

In a parallel effort the NPS completed an Environmental Assessment (EA) on the purchase of land and associated existing structures in Kotzebue, Alaska (Property Acquisition EA, June 2002). From that EA a Finding of No Significant Impact (FONSI) was recorded in July 2002. The NPS now plans to move forward with the purchase of some of this property, located on the west end of Third Avenue (specifically, Tract A, Lots 6,7,8 and 9, Block 11, US Survey 2863A). This property will be purchased from NANA Regional Corporation and will include the following existing structures:

- the 19,035 square-foot multi-purpose NANA building,
- an 1,800-2,000 square-foot mobile home, and
- a 2,000 gallon above-ground fuel storage tank.

As stated in the Property Acquisition EA, further environmental documentation and public review is required for modification or construction of any facilities on the property in question. This EA is intended to meet those requirements by determining whether any environmental concerns exist that would put development constraints on design and construction at the site.

This EA analyzes the NPS preferred alternative and the no-action alternative and related impacts. This EA has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969 and regulations of the Council of Environmental Quality (CEQ, 40 CFR 1508.9).

1.2 Issues/Impact Topics:

The issues selected for impact analysis were identified based on agency and public concerns, regulatory and planning requirements, and known resource issues resulting from the Property Acquisition EA for Kotzebue, Alaska issued in June 2002. A brief rationale for the selection of each issue is given below.

Cultural Resources. Since the Heritage Center project location is within the Kotzebue Archeological District and previous archeological investigations in the general vicinity have

found sites of significance, any renovation and/or construction could affect sites and objects of archeological significance. However, initial testing at the site during 2002 found no cultural resources eligible for the National Register of Historic Places. While some artifacts were recovered from the test trenches most were found within a clearly disturbed context thus minimizing their archeological value. Additionally, the multi-purpose NANA building itself has been determined ineligible for the National Register of Historic Places.

Land Use & Land Use Plans. Development of a Heritage Center and administrative facilities with associated parking may minimally affect existing land uses. However, such uses fall within those prescribed by the Kotzebue Comprehensive Plan and are in keeping with General Management Plans as outlined by the 1986 GMP and subsequent agreements.

National Park Operations. Renovation and/or construction of a Heritage Center or continued use of existing facilities would directly affect management and operations of Western Arctic National Parklands with respect to visitor information services, community education and outreach, and staff coordination.

Vegetation, Including Wetlands. Renovation and/or construction of a Heritage Center on the proposed site would impact vegetation, including wetlands, due to the excavation and potential loss of open ground. The majority of the proposed site is previously disturbed ground that is predominantly covered with gravel fill. However, there are 0.25 acres of land on the site characterized as wetland, though it is considered compromised and of little functional value. Additionally, opportunistic non-wetland species have colonized the hard packed bare ground and thin scattered layer of gravel.

Visitor Experience. Renovation and/or construction of a Heritage Center or continued use of existing facilities would directly affect visitor experience of Western Arctic National Parklands with respect to visitor information and orientation services and local community education and outreach.

1.3 Issues Dismissed from Further Consideration:

Fish and Wildlife. The proposed site for the Heritage Center is within the developed area of Kotzebue and does not support fish or wildlife populations (including threatened or endangered species).

Floodplains. The property is within Flood Zone B as shown on the National Flood Insurance Program Flood Insurance Rate Map, Panel 11 of 30. Zone B is described as, "Areas between limits of the 100-year flood and 500-year flood 'or certain areas subject to 100-year flooding with average depths less than one foot or where the contributing drainage area is less than one square mile' or areas protected by levees from the base flood" (ASCG, 2000). Under NPS guidelines building construction is allowable within a 500-year floodplain designation.

Minority or Low-Income Populations or Communities. Executive Order 12898 requires Federal agencies to incorporate environmental justice into their missions by identifying and addressing high and adverse human health or environmental effects in their programs and policies on minorities and low-income populations and communities. The NPS preferred alternative would

not result in adverse impacts on any minority or low-income populations or communities and thus complies with this order.

Resources and Values of Western Arctic Parklands. Development of a visitor and administration facility would have no adverse effect on the resources and values of Western Arctic Parklands. The facility would be located outside the boundaries of these units and would, in fact, help to promote the park's mission and values with visitors and the local community.

Subsistence. Renovation and/or construction of a Heritage Center would have no effect on subsistence resources because the proposed site, located in the village of Kotzebue, is not used for subsistence activities (see Appendix A for the ANILCA Section 810 subsistence evaluation).

1.4 Summary of Public Involvement:

The Property Acquisition EA, which included information on the intention to potentially develop a Heritage Center on the site, had a 30-day public comment period beginning June 21, 2002 and ending July 20, 2002. Public notice of the availability of the EA was published in the Arctic Sounder and posted on local bulletin boards. The EA was mailed to 11 agencies, organizations and individuals. No comments were received from the public.

As part of this planning process meetings have been held with NANA on four occasions. There have been two meetings with each of the following groups Maniilaq Native Association, Northwest Arctic Borough, Kotzebue IRA and the City of Kotzebue. Additionally, programs are scheduled for the NANA Board of Directors, the Kotzebue Elders Council and other regional tribal organizations and Elders Councils. There will also be a meeting in Kotzebue in March 2003 to review design alternatives.

2.0 Description of Alternatives

Given the fact that the NPS has entered a Record of Decision on the Property Acquisition EA as well as entering into a Project Agreement that stipulates good faith negotiation to purchase that same property, this EA process has focused on that property specifically. Additionally, since the design and planning alternatives for the project do not present appreciable differences in terms of their environmental and social impacts any combination of renovation and construction proposed by these options is treated as one alternative for the purposes of NEPA compliance efforts. Thus the two options presented here are comprised of the No Action Alternative and the Proposed Action Alternative.

2.1 Alternative 1: No Action

Under the no-action alternative the National Park Service (NPS) would continue to use its existing facilities in the City of Kotzebue. There would be no expansion of existing facilities. The property being considered for development would be acquired by the NPS but remain in its present state and maintain its present uses.

2.2 Alternative 2: Renovate and/or Construct a Heritage Center in Kotzebue, Alaska (NPS Preferred Alternative)

The NPS would renovate and/or construct a Heritage Center with associated parking on land located at the west end of Third Avenue (specifically, Tract A, Lots 6,7,8 and 9, Block 11, US Survey 2863A) in Kotzebue, Alaska. The site that includes Lots 6, 7, and 8 contains the 19,035 square-foot multi-purpose building and is currently owned by NANA. It would be purchased by the NPS (see Section 1.1 Background). Alternative 2 is also contingent upon successful purchase of Lot 9 owned by the Alaska Department of Transportation and Public Facilities. ADOTPF is currently concluding a realty action to receive public comment on the public on this proposed sale.

Under various design scenarios this building would either be renovated; partially renovated and partially demolished to make possible new construction; or completely demolished and a new structure built. A value analysis completed in December 2002 recommended substantial demolition of the existing structure with primarily new construction. In the eventual scenario the footprint of the building would cover most of Lots 6-8 with an overall building size of approximately 23,000 square feet or less. Parking would be incorporated on Lot 9 (figure 1).

The Heritage Center would provide visitor services, fulfill administrative functions and serve as an educational and cultural center for the local and surrounding communities. The intended building uses include visitor orientation and trip planning, interpretive exhibits, a cultural demonstration area, auditorium, sales area, multi-purpose classroom, cultural sharing workshops, and interactive computer stations. It would also serve administrative needs by providing reception and office space, conference and meeting space, computer and communications support and administrative and curatorial storage.

All construction would comply with local and federal building code requirements including those pertaining to flood hazards. Emergency warning and evacuation procedures would be maintained. The buildings would comply with all requirements for access by the disabled.

2.3 Environmentally Preferred Alternative

In accordance with Director's Order-12, *Conservation Planning, Environmental Impact Analysis, and Decision-making*, the NPS is required to identify the "environmentally preferred alternative" in all environmental documents, including EAs. The environmentally preferred alternative is determined by applying the criteria suggested in the National Environmental Policy Act (NEPA) of 1969, which is guided by the Council on Environmental Quality (CEQ).

Generally, these criteria mean the environmentally preferable alternative is the alternative that causes the least damage to the biological and physical environment and that best protects, preserves, and enhances historic, cultural, and natural resources (Federal Register, 1981).

The "No Action Alternative" is the environmentally preferred alternative, because no further excavation or vegetation clearing would occur under this alternative for renovation or

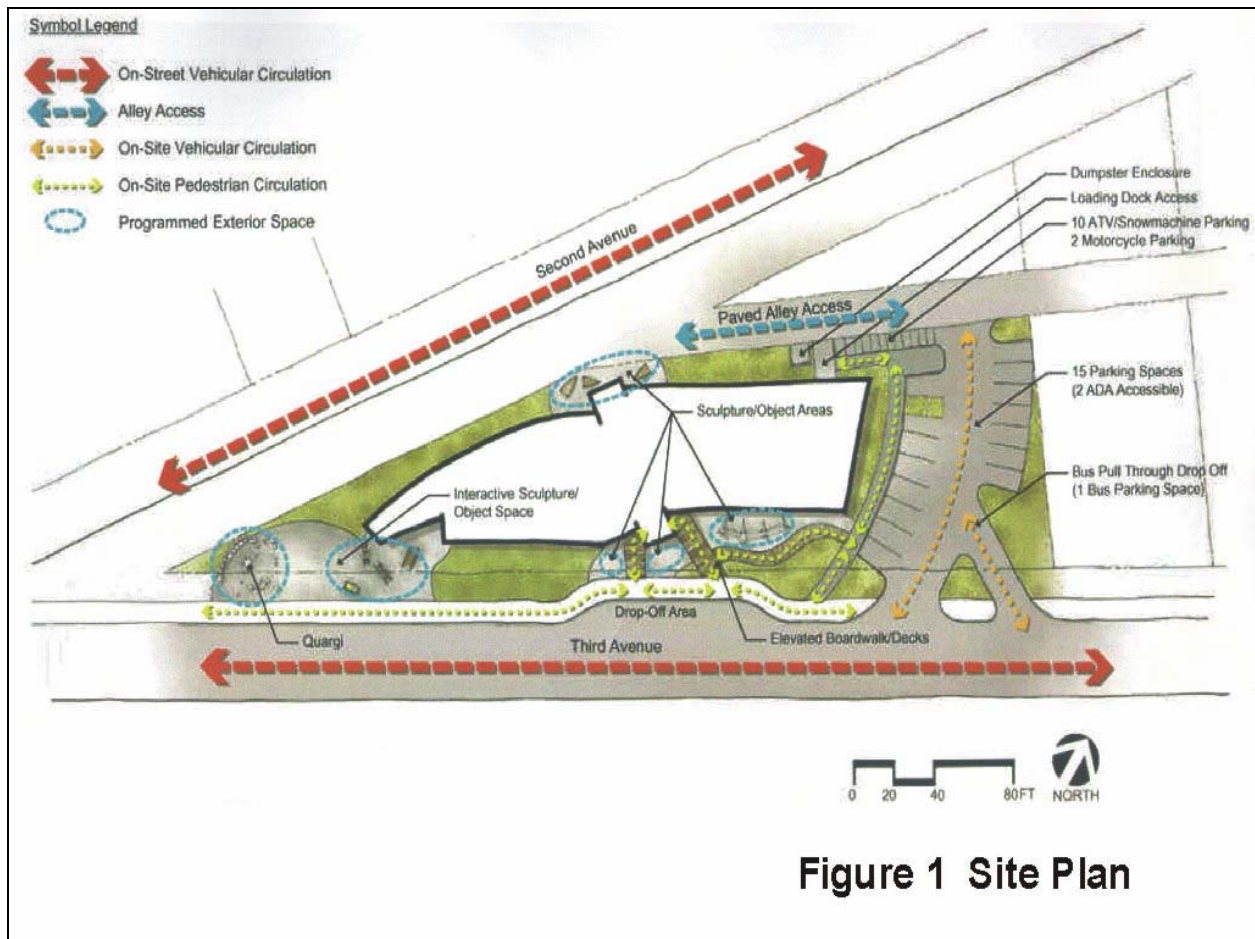


Figure 1 Site Plan

construction of a Heritage Center thus causing the least damage to the biological and physical environment. However, the fact that the property is already developed minimizes the environmental impacts of further disturbance resulting from this renovation and/or construction. Additionally, it is possible that the renovation and/or construction of a new heritage center would further ameliorate these effects by providing infrastructure that would better protect, preserve and enhance historic, cultural and natural resources within the park as well as the city of Kotzebue and surrounding communities. Thus supporting the position that the difference in impacts under the NPS Preferred Alternative and the No-Action Alternative would be negligible.

2.4 Mitigating Measures

Contaminants and Hazardous Substances. As part of the mitigating measures outlined in the Property Acquisition EA, any hazardous materials identified on the property would be removed prior to acquisition. Additionally, as part of a pre-acquisition environmental assessment, it was determined that small quantities of hazardous waste generation likely occurred on the property. Through groundbreaking activities (earthmoving, major landscaping, and geophysical or subsurface studies) the site would be visually inspected for further evidence of any soil and/or groundwater contamination by pollutants, contaminants or hazardous substances. If contamination were encountered, appropriate notification and remedial action would be taken to

ensure compliance with all applicable federal, state, and local government environmental statutes and regulations.

Vegetation. Landscaping would incorporate native plants & grasses onto the site.

Cultural Resources. The proposed site falls within the Kotzebue Archeological District and the area known as Old Kotzebue. While no historic structures are contained on the site the area has been determined eligible for inclusion on the National Register of Historic Places. Additionally, archeological investigations have revealed sites and objects of significance within the general vicinity. While preliminary testing of the site did not yield much of significance the proposed undertaking would proceed in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA) as well as with consideration for all Native American Graves Protection and Repatriation Act (NAGPRA) regulations.

Land Use and Building Codes. The proposed development would meet all City of Kotzebue Planning and Land Use requirements. Parking for the Heritage Center would meet Kotzebue parking guidelines for office and public assembly buildings. Both the facility and parking would meet all Americans with Disabilities Act requirements.

2.5 Summary and Comparison of Effects of Alternatives

Table 1 presents a summary and comparison of potential effects for Alternatives 1 and 2.

Table 1: Summary and Comparison of Effects for Alternatives 1 and 2

Impact Topic	Alternative 1: No-Action	Alternative 2: Renovate and/or Construct a Visitor and Cultural Center
Cultural Resources	The continued use of NPS facilities would have no effect on cultural resources.	Renovation &/or construction of the Heritage Center & associated parking would have minimal adverse effects on cultural resources; paving may better protect resources contained below that area.
Land Use and Land-Use Plans	Existing land uses would not change. The continued use of NPS facilities would be consistent with Kotzebue planning & zoning.	The Heritage Center & associated parking would be consistent with Kotzebue planning & zoning and would not significantly change current land use.
National Park Operations	The current NPS facilities would continue to be inadequate for current and future needs.	The new facility would improve operations by providing improved & consolidated visitor & community services & adequate workspace for staff as well as storage space.
Vegetation including Wetlands	The continued use of NPS facilities would have no effect on vegetation including wetlands.	0.02 acres of COE jurisdictional wetlands would be lost as part of the renovation &/or construction of the Heritage Center.
Visitor Experience	Projected increases in tourism coupled with undersized visitor facilities would make it increasingly difficult for the NPS to provide adequate visitor services for tourists or cultural opportunities for locals. The optimum visitor experience & cultural/educational opportunities may not be achievable. The multiple locations of existing services would continue to cause confusion & provide poor access to information.	The Heritage Center would greatly expand visitor opportunities to obtain information about local public lands, facilities & programs. It would also allow for greater cultural & educational opportunities for visitors & local residents. The Center's location would encourage walking access because of its distance from the airport.

3.0 Affected Environment

3.1 Land and Structures

The property and buildings being proposed for renovation and/or construction consists of a 0.75 acre parcel with the following existing major structures:

- the 19,035 square-foot NANA Museum building,
- an 1,800-2,000 square foot mobile home, and
- a 2000-gallon above-ground fuel storage tank.

The property is located at the West End of Third Avenue in Kotzebue, Alaska (Tract A, Lots 6, 7, 8, and 9, Block 11, US Survey 2863A).



Photograph 2: Multi-purpose NANA building (Lot 6-8)

The multi-purpose NANA building was constructed in 1975 and provided three main functions: an office space, an auditorium/museum, and a jade shop used to process raw jade acquired from local sources. The auditorium/museum and office space is still in use as part of a tourism-related business operated by NANA Development Corporation. The jade shop closed in the early 1990's and the majority of this space was gutted. It is now being used for

miscellaneous equipment storage and vehicle maintenance. Also, one apartment is located on the second floor of the old jade shop and is currently occupied. Most of the building and the wall surfaces appear to be in good condition, though the jade shop, because it has not been used for a number of years, is somewhat in disarray.

The double-wide mobile home is approximately 1800-2000 square feet total. The first floor is roughly framed in and is set on a concrete foundation. It was previously used by the Alaska State Troopers for snow machine and ATV storage (most are personally owned by staff). The second floor is now used for miscellaneous storage by the Alaska State Troopers and contains primarily personal items. It's an older mobile home, dating from the early 1970's, and shows obvious signs of neglect.



Photograph 3: Trooper Storage Trailer (Lot 9)

The City of Kotzebue owns the alley that runs adjacent to the above property. The alley is 20 feet in width and intersects with Second Avenue at an acute angle. Utility easements for water and overhead electrical are included within the alley. The alley contains flat, grassy terrain.

Hazardous Materials. In September 2001, Hart Crowser, Inc. prepared a pre-acquisition environmental assessment of Lots 6, 7, and 8 that provided information on current site conditions, as well as past practices, and the likelihood of hazardous waste contamination or other environmental conditions of concern on the subject property.

According to the assessment, indications of hazardous waste generation on the subject property included small quantities of household products such as used oils and cleaning products. There is also a possibility that wastes associated with equipment and vehicle maintenance (anti-freeze, batteries, solvents, used oil, fuel, etc.) may have been generated on-site. It is also possible spilled

petroleum products may have resulted in contamination of the grounds surrounding the multipurpose building. Approximately sixteen 55-gallon drums were observed in three locations around the multipurpose building. The area around these drums was observed to have pooled liquid (which appeared to be petroleum), stressed vegetation, and stained soils. In addition, there is stressed vegetation near the base of a 2,000-gallon heating oil above ground storage tank (AST), which may indicate a history of petroleum releases. One such release was reported to the Alaska Division of Environmental Conservation by NANA on May 27, 1986. The release was thought to be about 250 gallons, and flowed under the building before being pumped into recovery drums. Because of the 2,000-gallon AST on-site, the property owner is required to maintain a Spill Prevention, Control, and Countermeasure Plan. The assessment did not confirm the existence of this plan. A final report issued by Hart Crowser in October of 2002 outlined specific clean up activities that NANA must complete prior to acquisition of this property by the National Park Service.

Four pole-mounted transformers are located on the property; however, the owner of the transformers, the Kotzebue Electric Association, reported that the transformers do not contain polychlorinated biphenyls (PCBs).

Hart Crowser, Inc. performed a limited visual asbestos survey for the NANA Museum/multipurpose building. Several building materials were suspected of containing asbestos. These building materials pose no immediate environmental concern. In 2002 Hart Crowser completed a materials characterization survey of materials used in the NANA building. Asbestos was found in some building materials but the building materials were intact and considered to be in good condition. The asbestos is in a non-friable condition. The recommendation of the report is to implement an asbestos abatement program as part of the renovation and/or construction activities. This report also states that no lead-based paint was found (Structure Assessment, May 3, 2002).

During 2002 Hart Crowser completed an additional Ground Survey Assessment of Lot 9 and the alleyway running next to the property. On Lot 9 the survey found stained soils with levels of diesel-range organics above ADEC levels requiring clean up. Additionally, in the alleyway residual-range organics and Benzene were found at levels requiring ADEC soil clean up. The report goes on to estimate the amount of soil requiring clean up and indicates 80 cubic yards on Lot 9 and at least 10 cubic yards in the alley way. There is a 100-gallon storage tank in use on Lot 9 on the northwest side of the Trooper building, however, there is no soil staining apparent here. On the east side of the trooper building there is soil staining evident and is believed to be due to another 500-gallon storage tank that is no longer in use and has been dragged into the adjacent alley way. Finally a group of three 55-gallon drums was also noted on Lot 9, no staining is apparent around this grouping. (Level 2 Ground Survey, August 23, 2002). Any hazardous materials identified would be removed prior to NPS acquisition of the land.

3.2 Cultural Resources

Kotzebue is situated on a low spit at the northern tip of Baldwin Peninsula, in Kotzebue Sound. The spit is formed by a series of beach ridges. The property is located at the west-southwest end of the City of Kotzebue, at the junction of Second and Third Avenues. Although the beach ridges

that make up the landform have been rendered indistinct by development, two or more ridge crests appear to come together at this location (the roads appear to follow the ridge crests).

Although the NPS is unsure of their exact location, this is the general area of the “Old Kotzebue” site and some of the 1940s and 1950s excavations conducted by J. Louis Giddings and James W. VanStone. These archeological investigations demonstrated that the “Old Kotzebue” site was occupied about AD 1400. More recently, on either side of Second Avenue, structural features (c. AD 1150-1400) were excavated at the Park four-plex about 80 meters to the northeast of the property. Two burials (c. AD 1400-1550) were excavated on private property about 230 meters to the northeast. More anecdotally, a variety of artifacts, faunal remains, archeological features, and/or human remains have been observed in subsurface disturbances at a number of places along Second and Third Avenues in the vicinity of the property.

The project area is within the boundary of the Kotzebue Archaeological District, which has been determined eligible for the National Register of Historic Places. An Archeological evaluation done at the site during July and August of 2002 found no cultural resources eligible for the National Register of Historic Places. While a few artifacts were recovered, in most cases, they were found in a clearly disturbed context. Additionally the NANA building itself has been determined ineligible for inclusion on the National Register of Historic Places.

3.3 National Park Operations

Western Arctic National Parklands (WEAR) has offices in Kotzebue and Nome. The Kotzebue staff of WEAR consisted of 18 full time employees, with an additional 9 seasonal employees working various lengths of time throughout the fiscal year 2001. The Kotzebue full time staff consists of: Superintendent, Assistant Superintendent, Administrative Officer, Budget Analyst, Administrative Assistant, Chief of Maintenance, Maintenance Worker, Chief of Interpretation, Interpretive Ranger, Environmental Educator, Chief of Natural Resources, Wildlife Biologist, Geologist, Chief Ranger, Pilot, two Wilderness Rangers, and a Public Information Officer. Seasonal staff provided support for the full time workers during the busy summer and fall seasons. Seasonal staff consisted of two Rangers, three Maintenance Workers, three Interpretive Rangers and a Subsistence Specialist.

The NPS Kotzebue staff, equipment and facilities are dispersed in six different buildings: the Eskimo Building, the EON building, the hangar, the shop, the visitor center and the warehouse. Administrative, management and seasonal personnel utilize office space at the Eskimo Building located on Shore Drive. The Chief of Maintenance office and staff are located on Fifth Street in the shop, (the former Dairy Queen building). The Interpretive staff uses the WEAR Visitor Center on the south end of Second Street for office space and program presentation, this building is open only during the summer months due to difficulty heating the building. The pilot’s office space and equipment storage is located in the hangar, at the south end of the airport and is shared with other federal agencies. The Cultural Resources division uses office, lab and curatorial space in a portion of the EON building on Second Street. All Kotzebue staff use the shop and warehouse on Fifth Street for storage, logistic staging and repairs.

WEAR has cooperative research agreements and joint projects with numerous academic institutions, and state and federal agencies. All the field project personnel utilize park facilities for support during research projects occurring on parklands in northwestern Alaska. At times during the short and busy research season the number of people needing access to the Kotzebue NPS facilities can double the full time and seasonal workers. This applies intense pressure to WEAR facilities that are already utilized to the maximum extent possible. In addition to research projects, personnel from the Alaska Regional Office, other NPS personnel working in the area, visiting VIPs, and other project personnel utilize Kotzebue facilities throughout the year.

The dispersed WEAR facilities do not allow for effective communication between Park Service personnel, the continual, easy exchange of information that occurs when coworkers encounter each other many times a day in the same office is lacking. Modern telecommunication networks are difficult to install and maintain in a productive manner throughout the group of mostly older buildings. Operations are further impaired by the continual attention and devotion of resources required to maintain basic environmental building systems (heat, water and electricity) in such a severe climate and isolated environment. The occupied buildings are pre-existing structures that are difficult to maintain to federal government standards.

3.4 Vegetation, including Wetlands

Kotzebue is located on a 3-mile long spit at the end of the Baldwin Peninsula. "The predominant vegetation type on the Baldwin Peninsula is moist coastal tundra. Moist tundra ecosystems usually form a complete ground cover and are extremely productive during the growing season. They vary, from almost continuous, uniformly developed cotton grass tussocks with sparse growth of other sedges and dwarf shrubs, to stands where tussocks are scarce or lacking and dwarf shrubs dominate (City of Kotzebue 2000). Moist tundra vegetation is classified as wetland in Alaska (NPS 1994).

The majority of the property is previously disturbed land. Where not entirely gravel fill, the property is characterized by wetlands, as well as by opportunistic non-wetland species that have colonized the hard-packed bare ground and thin scattered layer of gravel. Wetlands cover about 0.25 acres of the property, including about 0.23 acres of palustrine unconsolidated bottom cobble/gravel seasonally flooded wetlands beneath the NANA Museum building and 0.02 acres of palustrine emergent persistent saturated wetland on the extreme southern end of the property. These wetlands are highly degraded and provide minimal functions. Non-wetland plant species cover less than a half-acre of the site and include grasses (*Hordeum jubatum* *Agropyron repens*, *Arctagrostis latifolia*, *Poa arctica*, *Elymus arenarius* ssp. *mollis*), herbaceous perennials (*Artemisia Tilesii*, *Tripleurospermum phaeocaphalum*, *Descurainia sophioides*, *Matricaria matricarioides*), and shrubs (*Salix alaxensis*).

3.5 Visitor Experience

Because of the many locations occupied by the Park Service in Kotzebue the public is presented with a scattered organizational façade which often makes it difficult to locate the appropriate Park Service contact for needed information. The building utilized as the NPS Visitor Center allows for only limited interpretive exhibits and programs and is only open during the summer

months due to difficulty providing adequate heat. The majority of non-local visitors are affiliated with package tours guided by Tour Arctic and so in addition to stopping at the NPS Visitor Center (usually 30-45 minutes) they are bused to other locations including the NANA building and a culture camp. A smaller percentage of visitors are traveling independently and require more in depth trip planning and orientation services which are difficult to provide to an optimal degree in present facilities. Another visitor group consists of local area residents who interact with the park staff and utilize parklands throughout the year.

4.0 Environmental Consequences

4.1 Alternative 1: No-Action

Effects on Cultural Resources. Under this alternative, the NPS would not renovate and/or construct on the site occupied by the multi-purpose NANA building. Therefore, any cultural resources on this property would not be impacted nor would they be protected from incidental disturbance.

Effects on Land Use & Land Use Plans. There would be no effects on land use or land use plans under this alternative. No change in existing structures would occur and there would be no anticipated change in present land use or land use plans.

Effects on National Park Operations. Park operations would continue to occur at a sub-optimal level. The current facilities and dispersed placement of park personnel and infrastructure would continue to negatively impact the park's ability to fulfill its mission. Park facility needs that relate to office space for staff, better communication infrastructure, and storage would remain unconsolidated, and for the most part, unresolved.

Effects on Vegetation, Including Wetlands. Under this alternative, the NPS would not renovate and/or construct on the site occupied by the multi-purpose NANA building. Therefore, the vegetation, including wetlands on the NANA building property, would not be impacted.

Effects on Visitor Experience. The experience of visitors would remain the status quo. Visitors on package tours would be shuttled between several locations including the current NPS Visitor's Center and the multi-purpose NANA building. The park's ability to orient visitors and provide interpretive displays and programs would not meet planned GMP goals. Independent travelers and local residents would continue to have difficulty locating the appropriate NPS personnel and information due to the scattering of staff and functions among various buildings.

Cumulative Impacts Analysis. Cumulative impacts are defined as the *incremental impacts* on the environment resulting from adding the proposed action to other past, present, and reasonably foreseeable future actions (also referred to as regional actions), including those taken by both federal and nonfederal agencies, as well as actions undertaken by individuals. Cumulative impacts may result from singularly minor but collectively significant actions taking place over a period of time (CEQ Sec 1508.7).

Past, present, and reasonable foreseeable future actions impacting the above issues within Kotzebue, Alaska include the following:

- Over the past century, Kotzebue has grown from a village of less than 200 people (1909) to one supporting about 3,000 people (City of Kotzebue 2000). To support this population growth, housing, gravel roads, schools, an airport, businesses, a hospital, water and wastewater systems, and other facilities were constructed. Most of the land suitable for development in Kotzebue has been developed. This development has, most likely, resulted in the loss of cultural resources as part of this process. Land use within the most developed part of Kotzebue has clearly changed from natural or rural to quasi-urban over the last century and Land Use Plans, a new concept in this region, have begun to be implemented.
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- Park operations and the experience of visitors, whether travelers or local residents, are constrained and detracted from by the current infrastructure available in Kotzebue. This situation is anticipated to worsen as the town and tourism continues to grow.
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- The *2000 City of Kotzebue Comprehensive Plan* predicts continued growth, including an additional 100 housing units, 70 apartment units, three new roads linking the village to other nearby communities or areas, and infrastructure improvement/replacement. It's expected that this new development would result in further loss of an unknown amount of moist coastal tundra vegetation.

Regardless of the above past, present, and reasonably foreseeable future actions, there would be no cumulative (incremental) impacts under this alternative, as no new actions would be taken.

Conclusions. In all categories there would be no significant impacts and, therefore, no impairment of park resources and values.

4.2 Alternative 2: Renovate and/or Construct a Heritage Center in Kotzebue, Alaska (NPS Preferred Alternative)

Effects on Cultural Resources. The multi-purpose NANA building has been determined ineligible for inclusion on the National Register of Historic Places and so any modification or demolition to the structure under this proposal would not be considered to effect Cultural Resources. Earth moving and foundation work would be required under this proposal which could potentially disturb archeological resources though, once completed the area may be better protected from incidental disturbance and erosion by coverage with pavement. Additionally, an archeological investigation of the site conducted during the summer of 2002 determined that projects on this property are expected to have no significant effect on cultural resources (NPS Archeological Survey 002-2002).

Effects on Land Use & Land Use Plans. Since the property is currently a site that is utilized by the tourist industry and also serves as office space for Tour Arctic, this alternative would not significantly change the land use that the property is currently experiencing. Nor is the proposed action expected to affect Land Use Planning for the area and, in fact, would fulfill the City's land use plan for that area.

Effects on National Park Operations. This proposal is expected to have a positive impact on National Park Operations by providing office and storage space to meet staff and operational needs.

Effects on Vegetation, Including Wetlands. Vegetation would be impacted directly by the proposed renovation and/or construction of a Heritage Center. However, the impacts are considered negligible as outlined below.

As described above, the 0.23 acres of non-jurisdictional palustrine unconsolidated bottom, cobble/gravel, seasonally flooded wetland beneath the multi-purpose NANA building has already been severely compromised and provides minimal wetland functions. Because of its current condition, draining or filling this wetland as part of part of the proposal would, for all purposes, have no additional wetland impacts. The only wetland impacts resulting from this proposal would be the loss of the 0.02 acres of jurisdictional palustrine emergent persistent saturated wetland on the extreme southern end of the property. Given the disturbed nature of this wetland and limited value in terms of functions served, the permanent loss of this amount is considered a negligible adverse impact on wetland vegetation. Further support for this conclusion lies in the fact that the city of Kotzebue is surrounded by thousands of acres of intact, high quality, moist tundra vegetation, which is classified as wetland in Alaska (NPS 1994).

Additionally, site development would include landscaping efforts that would enhance the vegetation currently found on parts of the property by introducing native grasses and other vegetation and providing conditions where they may be better able to thrive.

Effects on Visitor Experience. This proposal is expected to have a positive effect on visitor experience by providing improved visitor services and greater educational and interpretive opportunities for both tourists and local residents.

Cumulative Impacts Analysis. As noted in the "No Action Alternative," past, present, and reasonably foreseeable future actions have likely impacted cultural resources and clearly impacted vegetation, including wetlands, in many ways. These actions and related impacts would not differ under this alternative." Implementing the alternative would have a negligible adverse incremental impact on both cultural resources and wetlands and could possibly enhance the protection of cultural resources and establishment of native vegetation through landscaping. The loss of an additional 0.02 acres of wetlands is not considered significant given the current condition that thousands of acres of high quality, moist tundra vegetation (wetland) would remain intact.

Conclusions. Cultural Resources and Land Use would experience no significant impacts. National Park Operations and Visitor Experience would be expected to experience a beneficial effect. In the case of Vegetation, the permanent loss of 0.02 acres of wetlands would have a negligible adverse impact on wetland vegetation. The loss of less than half an acre of non-wetland vegetation would have no impact on overall plant populations due to the abundance of these types of opportunistic plant species throughout the Kotzebue area. The nature of these impacts would not result in the impairment of park resources and values.

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6.0 Consultation and Coordination

The following agencies, organizations, and individuals were consulted in the preparation of this document.

Federal Agencies/Individuals Consulted

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7.0 Literature Cited

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City of Kotzebue

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- 2001 Project Agreement between WEAR, NPS, NANA and Alaska Support Office for the Northwest Arctic Visitor and Cultural Center in Kotzebue, Alaska, 11/1 rev. On file at the National Park Service's Alaska Support Office, Anchorage, Alaska.
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- 2002 Programmatic Needs Assessment for Northwest Arctic Heritage and Cultural Center. On file at the National Park Service's Alaska Support Office, Anchorage, Alaska.
- 2002 Property Acquisition in Kotzebue, Alaska Environmental Assessment. On file at the National Park Service's Alaska Support Office, Anchorage, Alaska.
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- 2002 Structure Assessment and Limited Ground Survey, May 3rd, 2002. On file at the National Park Service's Alaska Support Office, Anchorage, Alaska.
- 2001 Pre-Acquisition Environmental Site Assessment, Northwest Arctic Native Association Multi-Purpose Building, Kotzebue, Alaska, September 2001. On file at the National Park Service's Alaska Support Office, Anchorage, Alaska.

APPENDIX A

ANILCA SECTION 810(a) Summary of Evaluations and Findings

I. INTRODUCTION

This section was prepared to comply with Title VIII, Section 810 of the Alaska National Interest Lands Conservation Act (ANILCA). It summarizes the evaluations of potential restrictions to subsistence activities, which could result from the proposal to renovate and/or construct a cultural and heritage center, administrative offices and parking in Kotzebue, Alaska.

II. THE EVALUATION PROCESS

Section 810(a) of ANILCA states:

“In determining whether to withdraw, reserve, lease, or otherwise permit the use, occupancy, or disposition of public lands ... the head of the federal agency ... over such lands ... shall evaluate the effect of such use, occupancy, or disposition on subsistence uses and needs, the availability of other lands for the purposes sought to be achieved, or disposition of public lands needed for subsistence purposes. No such withdrawal, reservation, lease, permit, or other use, occupancy or disposition of such lands which would significantly restrict subsistence uses shall be effected until the head of such Federal agency -

- (1) gives notice to the appropriate State agency and the appropriate local committees and regional councils established pursuant to Section 805;
- (2) gives notice of, and holds, a hearing in the vicinity of the area involved;
- (3) determines that (A) such a significant restriction of subsistence uses is necessary, consistent with sound management principles for the utilization of the public lands, (B) the proposed activity will involve the minimal amount of public lands necessary to accomplish the purposes of such use, occupancy, or other disposition, and (C) reasonable steps will be taken to minimize adverse impacts upon subsistence uses and resources resulting from such actions.”

ANILCA created new units and additions to existing units of the national park system in Alaska. Cape Krusenstern National Monument, Noatak National Preserve, and Kobuk Valley National Park were created for the purposes, among others, of protecting and interpreting, in cooperation with Native Alaskans, archeological sites associated with Native cultures; protecting habitat for, and populations of fish and wildlife; and to protect the viability of subsistence resources. Subsistence uses by local residents will continue to be permitted under the provisions of Title VIII of ANILCA.

The potential for significant restriction must be evaluated for the proposed action’s effect upon “... subsistence uses and needs, the availability of other lands for the purposes sought to be achieved and other alternatives that would reduce or eliminate the use.”

III. PROPOSED ACTION ON FEDERAL LANDS

The National Park Service is moving forward with purchasing up to 1.0 acres of land, and associated existing structures, within the 2nd Class City of Kotzebue for the purpose of constructing a cultural and heritage center, administrative offices and associated parking. The site already is developed and contains several buildings. This analysis addresses two alternatives: the “No Action” alternative and the “Proposed Action” alternative.

IV. AFFECTED ENVIRONMENT

The City of Kotzebue¹ is located in northwest Alaska at the tip of the Baldwin Peninsula in Kotzebue Sound. It serves as a regional center providing a hub of governmental, social, medical, and transportation services for the ten outlying communities within the NANA region. The heavily developed area of town lies on a spit about three miles long and ranging in width from 1,100 to 3,600 feet. The larger area of town is comprised of an area of about 27 square miles of land and about 1.7 square miles of water that shows very little development. The location for the proposed action is within the heavily developed portion of the town. The site does not support fish or wildlife populations. The vegetation is characteristic of opportunistic species that have colonized the hard-packed bare ground and thin scattered layer of gravel and does not support subsistence uses.

Kotzebue has a population of 3,082 people of which 76.7 % are Alaska Native. It has a mixed economy with the harvest of wild foods for subsistence purposes comprising a prominent sector of the economy. A 1986 study indicated that households in Kotzebue harvested an estimated 1,067,278 pounds of edible, wild resources. Caribou comprised 24.4 % of the harvest, bearded seal 19.0 %, salmon 18.4 %, and sheefish 12.2 %. A variety of remaining resources including but not limited to birds and their eggs, small mammals, and berries and green plants each comprised 3.2 % or less of the harvest by weight. The greatest percentage of this harvest took place outside of Kotzebue, especially at seasonal camps located particularly along the lower Noatak River, along the Kotzebue Sound-Chukchi Sea coast northwest of Kotzebue, the Kobuk River, and “Kobuk Lake”. An estimated 3.5 % of households maintained camps on the Baldwin Peninsula immediately adjacent to or very near Kotzebue. These included “North Tent City”, “South Tent City”, “Sadie Creek”, and *Iluviaq*. These camps were primarily used from May through October for fishing, seal and beluga hunting, and berry picking. Many Kotzebue residents pick berries in the tundra near Kotzebue especially between “Cemetery Hill” and “Sadie Creek”. Salmon fishing would be the most significant subsistence activity to occur in the vicinity of the proposed action since Kotzebue beaches remain a popular location for some residents for setting nets.

V. SUBSISTENCE USES AND NEEDS EVALUATION

To determine the potential impact on existing subsistence activities, three evaluation criteria were analyzed relative to existing subsistence resources that could be impacted.

¹ The physical description and population information is taken from the Alaska Department of Community and Economic development web based Community Database. The subsistence information is taken from the 1986 study of subsistence uses in Kotzebue by Georgette and Loon. See the references section of this 810 for full citations.

- the potential to reduce important subsistence fish and wildlife populations by (a) reductions in numbers; (b) redistribution of subsistence resources; or (c) habitat losses;
- what effect the action might have on subsistence fisherman or hunter access;
- the potential for the action to increase fisherman or hunter competition for subsistence resources.

1) The potential to reduce populations:

The “No Action” alternative is the status quo. It does not involve any renovation or construction by the National Park Service. Consequently there is no potential to reduce populations of subsistence resources through the actual reduction of numbers, the redistribution of resources, or habitat loss beyond the existing level resulting from the existing level of development of the City of Kotzebue.

The “Proposed Action” alternative involves renovation and/or construction on a small amount of already developed land within the heavily developed area of the City of Kotzebue. The proposed site does not support any subsistence resources in useable amounts and consequently does not support subsistence uses. The “Proposed Action” will not result in a reduction of populations of subsistence resources through the actual reduction of numbers, the redistribution of resources, or habitat loss beyond the existing level resulting from the existing level of development of the City of Kotzebue.

2) Restriction of Access:

The “No Action” alternative is the status quo. It does not involve any renovation and/or construction by the National Park Service. Consequently, it will not lead to an increase in restrictions to access.

The “Proposed Action” alternative involves renovation and/or construction on a small amount of already developed land within the heavily developed area of the City of Kotzebue. The majority of subsistence uses occur outside the city with lesser levels occurring along beaches in the vicinity of the Heritage Center site. City streets already bound the site, and this arrangement will not change. Consequently this alternative will not lead to any restrictions in access.

3) Increase in Competition:

The “No Action” alternative is the status quo. It does not involve any renovation and/or construction by the National Park Service, nor anticipated change in land use. Consequently, it will not lead to an increase in competition.

The “Proposed Action” alternative involves renovation and/or construction on a small parcel of already developed land within the heavily developed area of the City of Kotzebue. The site is one block from the beach and includes the multi-purpose NANA building which figures importantly in the tourist industry segment of the Kotzebue economy. Most visitors currently come in the summer, and arrive as part of package tours, with transportation to the NANA building via small buses. In the past, increasing levels of tourism have been linked to some reductions in the level of traditional subsistence activities occurring along the beaches.

Subsistence activities have either declined or been displaced beyond the zone of tourist activity. The NPS intends to use the site for the purpose of constructing a Heritage Center and NPS administrative offices. Land use patterns will not be changed and tourism levels are not expected to substantially increase. Consequently, while there may be some minor increase in the level of competition at this site, that increase will not be significant.

VI. AVAILABILITY OF OTHER LANDS

The 1986 General Management Plan for Cape Krusenstern National Monument called for the construction of several new National Park Service facilities in Kotzebue. These included a visitor contact facility, a museum, administrative offices, and equipment storage. A more recent Needs Assessment completed in 2002 listed several other structures including an improved maintenance building, warehouse storage, curatorial storage and an employee bunkhouse. A 2.61 acre parcel located in Kotzebue, and already owned by the NPS, was considered but it was determined that it did not meet the combined needs of the National Park Service and its partner in the Heritage Center project, the NANA Regional Corporation.

VII. ALTERNATIVES CONSIDERED

No alternatives other than the “No Action” and “Proposed Action” alternatives were considered.

VIII. FINDINGS

This analysis concludes that the “Proposed Action” alternative will not result in a significant restriction of subsistence uses. The “No Action” alternative will also not result in a significant restriction of subsistence uses.

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