Finding of No Significant Impact<br>Upgrade of King Salmon Seasonal/Transient Housing Facilities<br>Katmai National Park and Preserve, Alaska<br>December 2003

The National Park Service (NPS) has prepared an environmental assessment (EA) that evaluates the upgrade of seasonal/transient housing facilities at the administrative site for Katmai National Park and Preserve (KATM) in King Salmon, Alaska. The project will entail the removal of three aged, seasonal/transient housing trailers and replacement with a new 10 -bedroom dormitory. The existing trailers, one "double-wide" unit and two "single-wide" units, were acquired as surplus property from another federal agency in the mid-1980s and are estimated to be 30 years old. Together, these trailers account for 10 of the 15 bedrooms available in King Salmon for seasonal/transient employees, volunteers and official visitors. With this project, there will be no net gain or loss in the number of bedrooms.

The site of the new dormitory is currently occupied by the southern end of the existing double-wide trailer. The double-wide trailer will be removed before dormitory construction will commence. The two single-wide trailers will remain in use for the 2004 summer field season until dormitory completion. All three trailers will be completely removed from the site, including associated utilities such as fuel tanks and overhead electrical service. Existing underground utilities, such as heating hot water, will be disconnected and abandoned in place. New utility work to the new dormitory will include providing water, sewer, power and fuel service. Wooden walkways will be placed to connect with existing walkways and provide access to the dormitory.

The purpose of this proposed project is to (1) remove inadequate, substandard housing from the park housing inventory and (2) replace it with energy efficient, standard quality housing that requires less maintenance and satisfies regulatory health and safety requirements.

The proposed improvements are needed for several reasons. The trailers are now past their useful lives and are in a very poor and rapidly deteriorating condition. Roofs leak in all three trailers in several different places, windows are rotting out of their frames, and interior furnishings are dated and severely worn. Current NPS life safety requirements are unmet, particularly with respect to egress, fire sprinkler protection and smoke detection. Annual mainterrance and repair costs are escalating. Costs for heating are very high because of the lack of adequate insulation. Occupants experience unsafe, unsanitary living conditions, inadequate storage and poor lighting. Within the next year or so, unless major rehabilitation is undertaken, these trailers will need to be rated as uninhabitable.

Given the seasonal and transient nature of the tenancies in these quarters, and the fact that they are most heavily used in the summer months, private sector lease options are unavailable. A recurring possibility exists for limited surplus housing at the Federal Aviation Administration (FAA) complex about 1.5 miles west of the NPS King Salmon office, but this housing is only available for long-term, year-round occupancy. Further, since seasonal/transient staff and official visitors do not typically have personal vehicles, transportation would be a problem.

Seasonal park staff, working in King Salmon and in the park backcountry, are currently housed in the three trailers, as are transient staff, volunteers and official visitors. Without readily available housing with adequate standards, these staff positions would need to be eliminated. This would severely compromise the ability of the park to protect resources and park visitors and maintain facilities.

## Public Involvement

The EA had a 30-day public comment period beginning November 8, 2003 and ending December 7, 2003. The park mailed the EA to 34 agencies, organizations and individuals. Comments were received from the National Parks Conservation Association (NPCA) and the State of Alaska, Department of Natural Resources (ADNR).

The NPCA fully supports the NPS plan to remove the three housing trailers and replace them with a 10 -bedroom dormitory. The NPCA noted that it felt confident that the NPS will construct the new housing to have a minimal impact on park resources and values, and will comply with NPS quality design standards.

The ADNR, ANILCA Implementation Program provided substantive comments regarding ANILCA that are described, with corresponding NPS responses, on the attached errata sheet.

None of these comments changed the EA's conclusions about the effects of the proposed action or the No-Action Alternative.

## Alternatives

The EA evaluated two alternatives; the Preferred Alternative and a No-Action Alternative. Under the No-Action Alternative, KATM would continue to operate and maintain the three existing trailers at the King Salmon administrative site as housing for seasonal/transient staff, volunteers and official visitors. No facility upgrades would be completed.

## Mitigating Measures

Mitigation to be taken in conjunction with implementing the NPS Preferred Alternative includes:
Cultural Resources. Should previously unknown cultural resources be identified during project implementation, work will be stopped in the discovery area and the NPS will perform consultations in accordance with 36 CFR 800.11. The resources will be evaluated to determine if they are eligible to be listed on the National Register of Historic Properties. If proposed excavation locations could not be adjusted to avoid adversely affecting eligible cultural resources, the NPS will execute a Memorandum of Agreement (MOA) with the Advisory Council on Historic Preservation and the Alaska State Historic Preservation Office that will incorporate comments from consulting parties. The MOA will specify measures to minimize or mitigate adverse effects. Furthermore, as appropriate, the NPS will abide by provisions of the Native American Graves Protection and Repatriation Act of 1992. Any artifacts recovered from park property at the project site will be accessioned, cataloged, preserved, and stored in compliance with the NPS Cultural Resource Management Guidelines.

Soils and Vegetation. Larger trees in the project area, not directly in the footprint of the dormitory building, will be preserved.

Wildlife. Trees and shrubs in the woodland area will be cut before May 1 and after July 20 to avoid impacts to nesting birds.

## Environmentally Preferred Alternative

The No-Action Alternative is the environmentally preferred alternative because it would cause no damage to the biological or physical environment. The continued use of existing facilities under this alternative would result in moderate, short-term and long-term, negative impacts to visitor use. As the park was forced to eliminate staff positions due to the lack of seasonal housing, visitor needs could not be accommodated in the backcountry. However, park visitors in King Salmon would be unaffected, as they would continue to use the interagency King Salmon Visitor Center. This alternative would adversely impact park management and operations, to a moderate degree in the short-term, as housing for seasonal/transient staff, volunteers and official visitors in King Salmon continued to decline. A moderate, long-term, negative impact would result when this housing became uninhabitable and the park could not maintain adequate, seasonal staffing levels to fulfill park missions.

## Environmental Consequences of the Preferred Alternative

As documented in the EA, the NPS has determined the Preferred Alternative can be implemented with no significant adverse effect to aesthetics, air quality, soils and vegetation, wildlife, visitor use and park management. The environmental effects of the Preferred Alternative are summarized below.

Aesthetics. During construction and excavation activities over the course of the 14-15-month project, the administrative site will exhibit short-term, minor, negative impacts to aesthetics. Approximately 13,000 square feet will be affected by project development and ground disturbance activities. The presence of a permanent, hard-sided, two-story structure will, along with the removal of the three existing trailers, continue the trend to modify the site landscape to a more developed and permanent appearance. Long-term aesthetics will be improved to a minor degree by removal of the three deteriorating, visually distracting house trailers with a new, high quality, permanent structure exhibiting a visually pleasing appearance. In addition, the implementation of revegetation and ground
finishing work will be expected to improve the area landscape of the disturbed area over the course of approximately two years.

Air Quality. During spring through summer of 2004 and 2005, construction activities associated with this alternative will generate dust and machinery emissions that will have a short-term negligible impact on air quality. No long-term effects to air quality will occur at the park administrative site.

Soils and Vegetation. This alternative will result in minor, short-term and long-term, negative impacts to soils and vegetation in the project area. A total ground disturbance of approximately 13,000 square feet, or 0.3 acres (about $2.6 \%$ of the administrative site) will be expected, but the majority of this area has previously been disturbed. This will consist of the removal of the existing single-wide trailers ( 2,000 square feet), construction of a dormitory (a footprint of 2,100 square feet), and clearing of land around the dormitory (approximately 8,900 square feet).

The dormitory construction footprint includes the area currently occupied by the southern end of the existing double-wide trailer (approximately 300 square feet) and the small spruce/birch woods ( 3,000 square feet) with the remainder in grass and gravel parking. Of the 8,900 square foot area to be cleared around the dormitory, approximately 1,700 square feet will be replanted to lawn grass and 1,600 square feet will be covered with compacted gravel to serve as an extended driveway ( 1,150 square feet) and a parking area ( 450 square feet). The remaining 5,600 square feet (including the 3,000 square foot wooded area) will be planted in grass. Approximately 73 white spruce and paper birch trees and scattered clumps of willow will be removed from the site.

Soils will also be disturbed during excavation for the utilidor extension joining the new building with the existing duplex/warehouse. The new gravel parking area will be placed primarily in the existing double-wide trailer footprint. Excavation, backfilling and revegetation will be accomplished with a combination of hand tools and heavy construction machinery such as graders and backhoes. Utility line trenches will be immediately backfilled and the graded paths seeded with grass. With the implementation of revegetation and best management techniques, longterm impacts to soils and vegetation at the administrative site will be expected to be minor.

Wildlife. Minor short-term and negligible long-term, adverse impacts to wildlife will occur with this project from habitat loss and wildlife displacement. Animals could be temporarily displaced due to noise and activities associated with facility construction, mainly during March-September of 2004 and March -May 2005. However, these minor impacts on wildlife in the area will be short-term. It is expected that any displaced small mammals and passerine birds will have ho difficulty becoming established elsewhere on NPS or adjacent private property. Trees and shrubs in the woodland area will be cut before May 1 and after July 20 to avoid impacts to nesting birds. For these reasons, as well as the limited scope and area of the project, long-term wildlife impacts will be negligible.

Visitor Use. This alternative will result in negative, negligible, short-term effects during construction, since visitors to the park administrative site will observe and hear construction activities that could degrade the visitor experience. Even so, visitors to the park's backcountry will be unaffected by construction activities. In the long-term, visitor use will be expected to benefit to a moderate degree from continued presence of a stable, seasonal staff that was assured good quality housing.

Park Management. Some short-term, minor, negative impacts to park management functions will be expected due to disruption during construction activities. However, moderate, positive, long-term benefits will occur for employee housing and by extension, the park programs in which these employees work.

## Decision

The NPS decision is to select the Preferred Alternative, which will involve the upgrade of the seasonal/transient housing facilities at the administrative site for KATM in King Salmon, Alaska. This decision includes mitigating measures on cultural resources, soils and vegetation, and wildlife.

## Rationale for the Decision

The Preferred Alternative will satisfy the purpose of the project to (1) remove inadequate, substandard housing from the park inventory and (2) replace it with energy efficient, standard quality housing that requires less maintenance and complies with regulatory health and safety requirements. Construction activities associated with the Preferred Alternative will result in negligible to minor, negative, short-term impacts to aesthetics, air quality, soils and
vegetation, wildlife, visitor use and park management. However, over the long-term, this project will improve visitor use and park management at KATM.

The levels of adverse impacts to park resources anticipated from the Preferred Alternative will not result in an impairment of park resources that fulfill specific purposes identified in the establishing legislation or that are key to the natural or cultural integrity of the park.

Though it is the environmentally preferred alternative, the No-Action was not selected for implementation because it would not meet the purpose of the project as described above.

The Preferred Alternative complies with the Endangered Species Act, the National Historic Preservation Act, and Executive Orders 11988 and 11990. There will be no significant restriction of subsistence activities as documented by the Alaska National Interest Lands Conservation Act, Title VIII, Section 810(a) Summary Evaluation and Findings.

I find that the Preferred Alternative does not constitute a major federal action significantly affecting the quality of the human environment. Therefore, in accordance with the National Environmental Policy Act of 1969 and regulations of the Council on Environmental Quality ( 40 CFR 1508.9) , an environmental impact statement will not be prepared for the project.


ERRATA<br>Environmental Assessment<br>Upgrade of King Salmon Seasonal/Transient Housing Facilities<br>Katmai National Park and Preserve, Alaska<br>December, 2003

## NPS RESPONSE TO SUBSTANTIVE PUBLIC COMMENTS

A 30-day public comment period was provided for the Upgrade of King Salmon Seasonal/Transient Housing Facilities Environmental Assessment (EA), from November 8 through December 7, 2003. Comments were received from the National Parks Conservation Association (NPCA) and the State of Alaska, Department of Natural Resources (ADNR). The NPCA comments are addressed in the FONSI. Substantive comments and NPS responses are provided below. (Substantive comments are those that modify the existing alternatives, propose new alternatives not previously considered, supplement, improve, or modify the impact analysis, or make factual corrections.) Only the ADNR made substantive comments; however none of these comments changed the EA's conclusions about the effects of the proposed action or other alternatives.

## Alaska Department of Natural Resources, ANILCA Implementation Program

Comment 1: Administrative sites and visitor facilities in all conservation system units in Alaska are subject to ANILCA Section 1306. ANILCA Section 1306(a)2 states that, "...to the extent practicable and desirable, the Secretary shall attempt to locate such sites and facilities on Native lands in the vicinity of the unit." The EA does not provide information indicating the requirement under ANILCA Section 1306 was met.

Response 1: ANILCA Section 1306(b)2 states that for the purpose of establishing administrative sites, the Secretary may acquire real property which the Secretary determines to be suitable for administering the unit in conformance of unit management plans. As stated on page 2 of the EA, "Through Presidential Executive Order 10335 and Public Land Order 1861 of May 26, 1959, 11.43 acres of land was set aside for the NPS." The Land Order (amended by Public Land Order 3784, 8/10/65) specifically states the site is "for use of the National Park Service as an administrative site in connection with the administration of the Katmai National Monument". Furthermore, as stated on page 3 of the EA, "The KATM General Management Plan designated the administrative site as a park development zone. Structures, such as housing, that serve resource protection needs are included in this zone." Since the NPS has previously developed this designated lot for park administration purposes, it is impractical and undesirable to purchase additional Native land on which to construct the new dormitory.

Comment 2: We request that current statements in the EA about lack of local housing availability be supported by some analysis and documentation.

Response 2: As stated on page 2 of the EA, the 1998 Housing Needs Assessment for KATM "...confirmed that area housing is generally not available or affordable for seasonal employees." This situation has not changed in the King Salmon/Naknek area over the last several years. Furthermore, any existing, available rental housing would be located beyond a reasonable walking distance from the KATM headquarters, thus presenting transportation problems for seasonal/transient employees and official visitors.

Comment 3: In Appendix A, ANILCA Section 810(a) Summary Evaluations and Findings, page 21, Section V(1), the second sentence of the second paragraph is incorrect in that it does not recognize overlapping state authorities concerning subsistence and management of fish and wildlife populations. We request the EA include the following correction: "Provisions of ANILCA, as well as state and federal regulations, provide adequate tools to protect fish and wildlife populations within the Katmai National Park and Preserve, while ensuring a subsistence priority in the Preserve for local rural residents and allowing other uses."

Response 3: In recognition of state authorities concerning fish and wildlife populations, the NPS agrees to replace the second sentence of the second paragraph on page 21 of Appendix A, ANILCA Section 810(a) Summary Evaluations and Findings, Section V(1) from,
"Provisions of ANILCA, the Federal Subsistence Board, and NPS regulations provide the tools for adequate protection of fish and wildlife populations within Katmai National Preserve while ensuring a subsistence priority for local rural residents."
to
"Provisions of ANILCA, as well as federal and state regulations, provide adequate tools to protect fish and wildlife populations within the Katmai National Park and Preserve, while ensuring a subsistence priority in the Preserve for local rural residents and allowing other uses."

