

National Park Service
U.S. Department of the Interior

Glacier National Park
Waterton-Glacier International Peace Park
Montana



APGAR TRANSIT CENTER PARKING LOT EXPANSION FINDING OF NO SIGNIFICANT IMPACT

Background

In compliance with NEPA, the National Park Service (NPS) prepared an environmental assessment (EA) to examine alternatives and environmental impacts associated with a proposal to expand the parking lot at the Apgar Transit Center. The existing parking lot is too small to accommodate additional parking once visitor center operations are moved from Apgar Village to the Apgar Transit Center.

In the *Final General Management Plan and Final Environmental Impact Statement and Record of Decision* (NPS 1999), the NPS decided to construct a West Side Discovery Center and Museum north of the Going-to-the-Sun Road (GTSR) and Camas Road T-intersection and move visitor center operations from the existing visitor contact station – a small, converted house in the center of Apgar Village – to the new facility. Lack of funding has prevented the NPS from building such a facility.

In 2007, the Apgar Transit Center was constructed north of the T-intersection as part of the GTSR Rehabilitation Project. The facility serves as a transit staging area and facilitates visitor access and orientation along the GTSR during road rehabilitation. Currently, the transit center building is not being fully utilized. The park therefore intends to relocate existing west side visitor center operations from Apgar Village to the Apgar Transit Center. The relocation of visitor center operations will be a first step toward implementing the *Final General Management Plan* decision to develop a visitor center and museum at the site. The Apgar Transit Center parking lot is often full during the peak visitor period, and expanding it is necessary to provide for increased use when visitor center operations are relocated.

Selected Action

Alternative B, expansion of the Apgar Transit Center parking lot, is the National Park Service's preferred alternative because it best meets the purpose and need for the project as well as the project objectives to:

- Accommodate increased visitor use of the Apgar Transit Center following the relocation of visitor center operations.
- Provide for a quality visitor experience at the Apgar Transit Center.
- Minimize impacts to park resources while providing for visitor use and enjoyment.

Under Alternative B, the parking lot at the Apgar Transit Center will be extended approximately 90 feet (27 meters) to the north and 90 feet (27 meters) to the east. The northern expansion will accommodate approximately 60 passenger cars, including 4 accessible spaces, and the eastern expansion will provide parking for approximately 6 RV's and oversized vehicles. The existing parking lot contains 132 passenger car spaces (including 5 accessible spaces) and 15 RV or

oversized vehicle spaces. With some possible minor changes to the number of existing spaces, the expanded parking lot will provide approximately 190-195 spaces for passenger vehicles, including 9 accessible spaces, and 21 RV or oversized vehicle spaces.

A small island will separate the north expansion from the existing parking lot. The expanded parking lot will be designed to accommodate park snow removal operations and spaces for government vehicles and possibly short-term parking will be designated. Existing paths will be modified as necessary to access the expanded parking area. All paths will continue to accommodate bicycles and meet requirements of the Architectural Barriers Act (ABA).

Additionally, the park will work with the Confederated Salish and Kootenai Tribes to design and install a wayside exhibit or interpretive panels at the transit center and/or another location in the area to interpret the Kootenai traditional associations to the area. All new ground disturbance will be monitored for cultural artifacts, to include photographs and written documentation, and the park will notify the Tribes immediately if any cultural artifacts are encountered. The park will also expand the Native America Speaks Program on the west side by offering additional presentations by members of the Confederated Salish and Kootenai Tribes.

Approximately 1.2 additional acres of ground will be disturbed, including approximately 0.3 acre of temporary disturbance that will be restored with salvaged soils and native vegetation. Hazard trees may be selectively removed in accordance with the park's *Hazard Tree Management Plan*. Native vegetation, including trees, will be retained within the island between the north expansion and the existing parking lot; the island will be vegetated with supplemental plantings. A vegetation inventory will be completed prior to the start of the project. Following project completion, native species from the site will be utilized for revegetation seeding and restoration efforts. No upgrades to the existing stormwater detention area north of the parking lot will be required. Night work will probably occur, which will require temporary lighting; no permanent outdoor lighting will be installed.

Construction is anticipated to occur during fall and the following spring. The project is estimated to take approximately 8 weeks in total to complete. The construction schedule will depend on weather conditions; night work will accelerate the construction schedule and is likely, but will only occur in the fall. The expansion of the Apgar Transit Center parking lot will cost approximately \$500,000.00 and will be funded by the Federal Lands Highway Program.

Mitigation Measures

The following mitigation measures were developed to minimize the degree and/or severity of adverse effects and will be implemented:

Wildlife

- Work crews will be trained on appropriate behavior in the presence of wildlife and on proper storage of food, garbage, and other attractants.

Vegetation and Plant Species of Concern

- Glacier National Park's Best Management Practices will be implemented to minimize the extent of impacts.
- Disturbance to vegetation will be avoided as much as possible and contained to as small a footprint as possible while meeting project objectives.
- Any specimens of the state listed sensitive velvetleaf huckleberry shrub within the area to be disturbed will be removed and transplanted in a suitable location adjacent to the site.
- Non-native invasive plant infestations near the parking area will continue to be treated

on a yearly basis.

Soils

- Glacier National Park's Best Management Practices will be implemented to minimize the extent of impacts.
- Disturbance to soils will be avoided as much as possible and contained to as small a footprint as possible while meeting project objectives.
- Existing topsoil resources will be evaluated for non-native invasive plant infestations. Heavily infested topsoil will be removed. Non-infested topsoil will be salvaged, stored according to Glacier National Park soil conservation guidelines, and replaced once construction is complete.
- Erosion control measures that provide for soil stability and prevent movement of soils during rain events will be implemented.
- Any ground surface temporarily disturbed during construction will be aerated and replanted with native vegetation to reduce compaction and prevent erosion.
- Following construction, all conserved top soil will be used to restore the area.

Cultural Resources

- Although previous archeological surveys have not identified archeological resources in the project area, all new ground disturbance will be monitored by an archeologist.

Alternatives Considered

The EA evaluated two alternatives, including the no action and one action alternative. Under Alternative A, no action, there will be no change to current conditions; the parking lot at the Apgar Transit Center will not be expanded. Alternative B, expand the Apgar Transit Center parking lot, is the preferred alternative, as described in the previous section. Two alternative designs for the parking lot expansion and an element of the action alternative were considered but dismissed.

Environmentally Preferable Alternative

According to the CEQ regulations implementing NEPA (43 CFR 46.30), the environmentally preferable alternative is the alternative "that causes the least damage to the biological and physical environment and best protects, preserves, and enhances historical, cultural, and natural resources. The environmentally preferable alternative is identified upon consideration and weighing by the Responsible Official of long-term environmental impacts against short-term impacts in evaluating what is the best protection of these resources. In some situations, such as when different alternatives impact different resources to different degrees, there may be more than one environmentally preferable alternative."

Alternative A (No action) is the environmentally preferable alternative because there will be no activities that will disturb elements of the biological and physical environment.

Alternative B (expand the Apgar Transit Center parking lot) is not the environmentally preferable alternative because it will cause the permanent removal of native vegetation and permanent soil compaction and loss of soil productivity on 0.9 acre; temporarily disturb vegetation and soils on 0.3 acre; increase the potential for non-native invasive plants to become established in the project vicinity; temporarily disturb and displace wildlife, including the threatened grizzly bear, during the construction period; cause the loss of 1.2 acres of lodgepole pine forest habitat; and temporarily affect the natural soundscape during the construction period.

While Alternative B is not the environmentally preferable alternative, it will best accomplish the purpose and need of the proposal and will not significantly impact affected natural resources. Alternative B will provide for visitor use and enjoyment, which, in addition to resource conservation, is in accordance with the 1916 Organic Act for the National Park Service. Through mitigation measures and project design, Alternative B will achieve a balance between visitor use and enjoyment and conservation of park resources. Department of the Interior (DOI) regulations do not require that the environmentally preferable alternative be selected as the NPS preferred alternative (DOI 43 CFR Part 46, Implementation of the National Environmental Policy Act of 1969, § 46.420).

Why the Selected Action Will Not Have a Significant Effect on the Human Environment

As defined in 40 CFR §1508.27, significance is determined by examining the following criteria:

Impacts that may be both beneficial and adverse. Implementation of the preferred (selected) alternative will result in some adverse impacts, summarized as follows: The permanent loss of vegetation on approximately 0.9 acre, the increased susceptibility to invasion from non-native invasive plants, changes in the shade regime, future hazard tree removal, and the temporary disturbance of approximately 0.3 acre will have minor, short and long-term adverse impacts to vegetation. There will be minor to moderate, adverse impacts to velvetleaf huckleberry from the disturbance of less than 1% of the known population; impacts will be short or long-term depending on transplanting success. Permanent compaction and loss of soil productivity on 0.9 acre and the temporary disturbance of soils and increased susceptibility to invasion from non-native invasive plants on approximately 0.3 acre will have minor, short and long-term adverse impacts to soils. Disturbance, displacement, and habitat loss will have negligible to minor, adverse, short-and long-term impacts to wildlife; and noise during the construction period will cause moderate, short-term adverse impacts to natural soundscapes. There will be minor to moderate, short-term adverse impacts on visitor use and experience from temporary noise during the construction period. Changes to the immediate forested viewshed and the visibility of recreational vehicles from the entrance road will have negligible to minor, long-term adverse impacts to visual resources; the construction period will have short-term, negligible to minor adverse impacts to visual resources.

Beneficial impacts from the action will include minor to moderate, long-term beneficial impacts to visitor use and experience from improved parking availability and an enhanced ability to stop in one location for interpretation, information, tour buses, and transit services. There will also be minor, long-term beneficial impacts to visual resources from an expanded view of nearby mountain ridges.

The degree of effect on public health or safety: The preferred alternative will not affect public health and safety.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas: Apgar is at the foot of Lake McDonald, which is a place of traditional importance to the Kootenai Tribe.

There are no historic buildings, structures, or cultural landscapes within the project area. The transit center is near the Going-to-the-Sun Road (GTSR), a National Historic Landmark listed in the National Register of Historic Places and the park's only fully documented cultural landscape. The National Historic Landmark boundary for the GTSR begins 30 feet (approximately 9.0 meters) east of the center of the intersection between the GTSR, the Camas Road, and the

transit center entrance road. The transit center is outside the GTSR National Historic Landmark boundary, and the parking lot expansion will result in no change to views from areas outside the facility, including the GTSR. The project will therefore not affect the GTSR National Historic Landmark.

No other historic properties and no wetlands, prime farmlands, wild and scenic rivers, or ecologically critical areas will be affected by the project.

The degree to which effects on the quality of the human environment are likely to be highly controversial: The proposal to expand the parking lot at the Apgar Transit Center was not highly controversial during the environmental process. Only twelve correspondences were received; none were opposed to the project, and seven expressed support.

The Confederated Salish and Kootenai Tribes Historic Preservation Department raised concerns about the Kootenai story being lost as a result of cumulative effects on the landscape from development in the Apgar area over the past one hundred years and the lack of interpretive information and visitor education on Kootenai history and traditional use of the area. The park has agreed, as part of this parking lot expansion project, to include interpretive panels or wayside interpretation of the Kootenai traditional associations to the area and to offer the Tribe additional Native America Speaks Program presentations on the west side. Additionally, the park and the Tribe will develop a Memorandum of Understanding (MOU) or other appropriate agreement to design and develop additional interpretive exhibits, programs, and research opportunities. An archeologist will monitor any ground disturbance during the project and, as requested, the park will notify the Tribe immediately if any resources are found. The Tribal Preservation Department concurred with the additional measures in a letter dated June 25, 2012, and also requested that the site be monitored during ground disturbance.

The degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks: The environmental process has not identified any effects that are highly uncertain or may involve unique or unknown risks.

The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration: The parking lot expansion is a small-scale facility upgrade similar in scope to other projects that have provided for visitor use and enjoyment. Moreover, the preferred alternative will facilitate the relocation of visitor center operations to the Apgar Transit Center, which was a decision evaluated in the 1999 *General Management Plan/Final EIS* (GMP). Any precedent for future actions has therefore already been established by the GMP, and was evaluated in the FEIS; therefore, the preferred alternative for the current project does not set a new precedent for future actions with significant effects, nor does it represent a new decision in principle about a future consideration.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts: Cumulative effects were analyzed in the EA and no significant cumulative impacts were identified.

The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources: There are no historic buildings, structures, or cultural landscapes in the project area. The area of potential effect has been adequately surveyed; no identified and/or unevaluated historic properties exist, and the probability of discovering historic properties within the area of potential effect is highly unlikely. Therefore, no historic properties will be affected, and the project will not result in the loss or destruction of significant scientific, cultural, or historical resources. On April 5, 2012, the NPS documented a “no historic properties affected” finding in the EA transmittal letter to the Montana State Historic Preservation Officer (SHPO). In an email dated April 18, 2012, the SHPO concurred with the NPS’s “no historic properties affected” determination.

The Confederated Salish and Kootenai Tribes Historic Preservation Department raised concerns about the Kootenai story being lost as a result of cumulative impacts on the landscape from development in the Apgar area over the past one hundred years and requested that the park provide additional interpretive information and education on the Kootenai Tribes traditional use of the area. The park has agreed to add wayside interpretation or interpretive panels and offered additional presentations under the Native America Speaks Program as part of this project, and has also committed to work with the Tribe over the long-term toward interpretation of the area’s traditional significance to the Kootenai people under an Memorandum of Understanding. In a letter dated June 25, 2012, the Tribal Historic Preservation Department stated their support for the project, and requested that the site be monitored during ground disturbance.

The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973: Under Section 7 of the Endangered Species Act, the determination for the threatened grizzly bear, Canada lynx, bull trout, water howellia, and Spalding’s catchfly is “no effect”. There will also be no effect to wolverine or the meltwater stonefly, both Candidate species. Potential disturbances resulting from construction activity will have only temporary, negligible adverse impacts on grizzly bears and Canada lynx, and will not measurably affect wolverines; no critical habitat will be affected. There is no bull trout or meltwater stonefly habitat and no recorded observations or suitable habitat for water howellia or Spalding’s catchfly in the project area.

State-listed species of concern will not be measurably impacted by the project; the project will occur after the sensitive nesting and denning period, many migratory bird and bat species will have left the area or be close to leaving, and the project area does not contain typical, suitable, or preferred habitat for species such as the bald eagle, northern bog lemming, hoary bat, and fisher. The *Montana Natural Heritage Program* website, which is part of Montana’s official state website and describes the range and distribution of state-listed species of concern, was accessed on July 20 and December 15, 2011.

Whether the action threatens a violation of Federal, state or local law or requirements imposed for the protection of the environment. The action will not violate any federal, state, or local laws or environmental protection laws.

Public Involvement and Agency and Native American Consultation

The environmental assessment was made available for public review and comment during a 30-day period ending May 7, 2012. The announcement was also posted on the National Park

Service's public comment website. Letters were sent to recipients on the park's EA mailing list and various federal, state, and local agencies, including the U.S. Fish and Wildlife Service, Montana Fish, Wildlife and Parks, the Montana SHPO, the Advisory Council for Historic Preservation (ACHP), the Blackfeet Tribal Business Council, and the Confederated Salish and Kootenai Tribe. Twelve correspondences were received during the EA public review period; none were opposed the project and eight expressed support.

The NPS documented a "no historic properties affected" finding in the EA transmittal letter to the Montana SHPO dated April 5, 2012. In an email dated April 18, 2012, the SHPO concurred with the NPS's "no historic properties affected" determination.

No comments were received from the Blackfeet Tribe.

During a meeting with park staff following public release of the EA, the Confederated Salish Kootenai Tribes Historic Preservation Department raised concerns about the loss of Kootenai history from continued development in the Apgar area over the past one hundred years. On April 10, 2012, the Tribal Historic Preservation Department sent the park an email stating that while the EA had addressed National Register of Historic Places Criterion D issues, it did not consider Criteria A, B and C. See the Errata Sheets attached to this FONSI for the Text Changes that were made to the EA on pp. 9-10 (Impact Topics Dismissed from Further Analysis, Ethnographic Resources), p. 12 (Preferred Alternative), and p. 18 (Table 1, Summary of alternatives) to address this concern. In a follow up phone call, they requested that Park staff attend a Kootenai Elders Advisory Meeting. Park staff attended this meeting on May 9, 2012 and provided a presentation of the project and expressed the park's willingness to explore ways to expand interpretation of the area's traditional significance to the tribe. Following that meeting, the Tribal Historic Preservation Department requested a number of specific measures to interpret Kootenai history in the area (email 5/10/12). In a letter dated May 22, 2012, the park agreed to include wayside interpretation of the Kootenai story and add Native America Speaks Program presentations on the west side as part of the parking lot expansion project. The park also committed to ensuring that the importance of the Apgar area is interpreted and shared with visitors to the appropriate extent. Additionally, the park proposed working with the Tribe to develop a Memorandum of Understanding (MOU) or other agreement to explore other interpretive opportunities and define a comprehensive framework for consultation regarding the future of Apgar. On June 14, 2012, park staff met with Francis Auld of the Tribal Historic Preservation Department to conduct a site visit and discuss the tribe's concerns. The park sent a follow-up letter to Mr. Auld on June 19, 2012 and reiterated the park's willingness to continue to work with the Kootenai to address their concerns. In a letter dated June 25, 2012, the Tribal Historic Preservation Department stated their support for the parking lot expansion and agreed to the development of the MOU. They also requested that all ground disturbance be monitored (to include photographs and written documentation) and that the tribe be notified immediately if cultural artifacts are encountered.

The Department of the Army Corps of Engineers (COE) sent a letter dated May 9, 2012 stating the need for an on-the-ground wetland delineation and a Department of the Army (DA) permit if the project involves the installation of fill material into waterways and wetlands. Park staff contacted the COE by phone on May 21, 2012 and explained that no fill material would be installed in any waterways (there are no waterways in the project area) and that, as stated on p. 8 of the EA (*Impact Topics Dismissed from Further Analysis, Wetlands*), no evidence of wetland hydrology was observed during surveys of the project area in 2001 and 2011. The COE representative said that no further consultation is required.

Substantive comments raised concerns about cumulative effects to ethnographic resources from continued development in the Apgar area and the lack of interpretation of Kootenai

traditional use of the area, visitor center features, and connectivity between the transit center and Apgar Village; questioned when and if the parking lot reaches full capacity; inquired about snow plowing operations at the transit center and long-term plans for the shuttle system/transit center; and made suggestions regarding the existing Apgar Visitor Center building, visitors' ability to contact concessioners, and overall development compared with naturally restored areas. These comments are addressed in the Errata Sheets attached to this FONSI. The FONSI and Errata Sheets will be sent to all commenters.

References

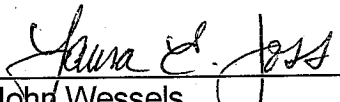
National Park service (NPS). 1999. Final general management plan and environmental impact statement for Glacier National Park. U.S. Department of the Interior, National Park Service, Glacier National Park, West Glacier, MT.

Conclusion

As described above, the preferred alternative does not constitute an action meeting the criteria that normally requires preparation of an environmental impact statement (EIS). The preferred alternative will not have a significant effect on the human environment. Environmental impacts that could occur are limited in context and intensity, with adverse and beneficial impacts that range from negligible to moderate, short to long-term, and site-specific to local. There are no unmitigated adverse effects on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other 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 action will not violate any federal, state, or local environmental protection law.

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

Approved:



John Wessels
Regional Director, Intermountain Region

7/13/12
Date

ERRATA SHEETS

APGAR TRANSIT CENTER PARKING LOT EXPANSION

GLACIER NATIONAL PARK

According to NPS policy, substantive comments are 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.

Twelve correspondences were received during public review of the EA. Nine comments within these correspondences were considered substantive and are addressed below in the *Responses to Comments* section. Substantive comments raised concerns about cumulative effects to ethnographic resources from continued development in the Apgar area and a lack of interpretation of the Kootenai Tribe's traditional use of the Apgar area, visitor center features, and connectivity between the transit center and Apgar Village; questioned when and if the parking lot reaches full capacity; inquired about snow plowing operations at the transit center and long-term plans for the shuttle system/transit center; and made suggestions regarding the existing Apgar Visitor Center building, visitors' ability to contact concessioners, and overall development compared with naturally restored areas.

TEXT CHANGES

A few text changes were made to the EA to address concerns raised by the Confederated Salish and Kootenai Tribal Historic Preservation Department and to clarify the potential impacts to vegetation and soils from non-native invasive plants. Italicized and underlined text indicates the section in the EA that has been altered. Strikeout is used to show text that has been struck from the EA. Bold text is used to show new text and text that replaces stricken text.

pp. 9-10, Impact Topics Dismissed from Further Analysis, Cultural Resources, Ethnographic Resources

Ethnographic Resources

~~Ethnographic resources are defined by the NPS as "the cultural and natural features of a park that are of traditional significance to traditionally associated peoples" (NPS 2006). The proposed action is not expected to impact ethnographic resources. Neither the Blackfoot Tribe nor the Confederated Salish and Kootenai Tribes raised concerns about the proposed action during scoping for this project or when the transit center was constructed. Therefore, ethnographic resources have been dismissed from further evaluation. However, Glacier National Park recognizes that the tribes hold a body of knowledge that may result in the identification of ethnographic resources in the area in the future. If ethnographic resources are identified later, consultation will occur in accordance with federal legislation and regulations and NPS policy. During a meeting in April 2011, Confederated Salish and Kootenai Tribal Historic Preservation Department staff asked the park to explore opportunities for expanded interpretation of Salish, Pend d'Oreille, and Kootenai presence in the area. That request will be explored in consultation with the tribal preservation department when the park undertakes further planning for improving traffic, parking, and pedestrian circulation in Apgar Village and/or new exhibits in the visitor center.~~

Ethnographic resources are defined by the NPS as "the cultural and natural features of a park that are of traditional significance to traditionally

associated peoples" (NPS 2006). In a meeting on April 27, 2011 that discussed this project as well as others, the Confederated Salish and Kootenai Tribal Preservation Department did not raise concerns nor did they raise concerns during public scoping for this project or during the transit center project. The Blackfoot Tribe also did not raise concerns during scoping. The Confederated Salish and Kootenai Tribes commented during the public comment period for this EA, stating that the Apgar area is of traditional importance to the Tribe and their history is being affected by cumulative impacts to the landscape from development over the past one hundred years and continued development in the area, and that they want to have these values interpreted for visitors. Therefore the proposed action would incrementally increase development at the foot of Lake McDonald, resulting in a cumulative adverse effect on a traditionally important landscape. As agreed with the Confederated Salish and Kootenai Tribal Preservation Department, wayside interpretation and/or interpretive panels would be developed and installed and additional presentations under the Native America Speaks Program would be added as part of this project. A Memorandum of Understanding or appropriate agreement would be developed to provide a framework for a larger comprehensive consultation, planning and design process for interpretation and visitor education of the Kootenai's traditional use and value of the Apgar area. Additionally the park will seek funding to assist the Tribe to begin defining the traditional cultural property values throughout the park beginning with the Apgar area. The Tribe has concurred with these measures. Impacts from the project would be minor and adverse and cumulative impacts from the project would be minor or less, therefore ethnographic resources have been dismissed from further evaluation.

p. 12, Alternatives, Alternatives Carried Forward, Alternative B - Preferred. Additionally, the park would work with the Confederated Salish and Kootenai Tribes to design and install wayside exhibits or interpretive panels at the transit center and/or another location in the area to interpret Kootenai traditional use of the area. All new ground disturbance would be monitored for cultural artifacts, to include photographs and written documentation, and the park would notify the Tribes immediately if any cultural artifacts are encountered. The park would also expand the Native America Speaks Program on the west side by offering additional presentations by members of the Confederated Salish and Kootenai Tribes.

p. 18, Table 1, Summary of Alternatives

Alternative Elements	Alternative A – No Action	Alternative B - Preferred
Interpretation of Apgar's Native American history	A wayside exhibit or interpretive panels and an expanded Native America Speaks Program on the west side would not occur as part of this project.	The park would work with the Confederated Salish and Kootenai Tribes to design and install interpretive panels or a wayside exhibit(s) to interpret Kootenai traditional use of the area, monitor ground disturbance and notify the Tribes of any cultural artifacts, and expand the Native America Speaks Program on the west side by offering additional presentations by members of the Tribes.

p. 19, Table 2, Environmental Impact Summary by Alternative.

Impact Topic	Alternative A – No Action	Alternative B – Preferred
Vegetation and Plant Species of Concern	None.	Minor, adverse, site-specific, and short and long-term from the permanent loss of vegetation on approximately 0.9 acres, the establishment of increased susceptibility to invasion from non-native invasive plants, changes in the shade regime, future hazard tree removal, and the temporary disturbance of approximately 0.3 acres. There would be minor to moderate, adverse, site-specific impacts to velvetleaf huckleberry from the disturbance of less than 1% of the known population; impacts would be short or long-term depending on transplanting success.
Soils	None.	Minor, adverse, site-specific, and short and long-term from the permanent compaction and loss of soil productivity on 0.9 acre, and the temporary disturbance of soils and establishment of weed species increased susceptibility to invasion from non-native invasive plants on approximately 0.3 acre.

p. 27, Affected Environment and Environmental Consequences, Vegetation and Plant Species of Concern, Impacts of Alternative B – Preferred. Also, additional acreage in the vicinity of the project area would likely be indirectly impacted by the establishment of **an increased susceptibility to invasion from** non-native invasive plants, changes in the shade regime, and future hazard tree removal.

p. 29, Affected Environment and Environmental Consequences, Vegetation and Plant Species of Concern, Impacts of Alternative B – Preferred, Conclusion. Vegetation would also likely be adversely affected by the establishment of **an increased susceptibility to invasion from** non-native invasive plants, changes in the shade regime, and future hazard tree removal.

p. 31, Affected Environment and Environmental Consequences, Soils, Impacts of Alternative B – Preferred, Conclusion. The parking lot expansion would have minor, adverse, site-specific, and short and long-term impacts to soils from the permanent compaction and loss of soil

productivity on 0.9 acre and from the temporary disturbance of soils and establishment of weed species increased susceptibility to invasion from non-native invasive plants on approximately 0.3 acre.

RESPONSE TO COMMENTS

Responses are in bold italics.

1. **COMMENT:** The Apgar area is a place of traditional importance to the Kootenai Tribe. The Confederated Salish Kootenai Tribes Historic Preservation Department requested a number of specific measures that would interpret Kootenai history in the area.

RESPONSE: See FONSI sections- *Why the Selected Action Will Not Have a Significant Effect on the Human Environment, Public Involvement and Agency and Native American Consultation and Text Changes.*

2. **COMMENT:** I had hoped that a new self-standing visitor center would be built, to include a museum and interpretive display.

RESPONSE: *As stated on p. 16 of the EA in response to a similar comment during scoping, the park has already decided to construct a visitor center with a museum and interpretive display as described in the 1999 General Management Plan. This project would begin when funding is available. Such a visitor center, however, is beyond the scope of available funds and this parking lot expansion project.*

3. **COMMENT:** The EA needs to reference the study that supports the statement on page 2 that the existing parking lot already reaches full capacity during the peak visitor period. For instance, is there "full capacity" for a few hours per year? For a few days per year? Or for a month or two per year? I've never seen the parking lot full or even near full, based on my frequent visits as a user of the shuttle from the transit center.

RESPONSE: *The statement in question is not based on a study, but on frequent observations by NPS staff. Park staff have consistently observed that the parking lot often becomes full, intermittently, during the peak visitor season in July and August.*

4. **COMMENT:** This EA suggests that the shuttle and transit center is budgeted as a long-term program that exists beyond restoration of the GTSR. Is this the case? If not, there should be an explanation within the document.

RESPONSE: *Please see the response to a similar comment from scoping on pp. 15-16 of the EA, under Alternatives, Suggestions, and Concerns from Public Scoping. Once road rehabilitation is complete, the park intends to continue the transit service provided funding remains available. The park will begin a planning project shortly to look at the transit system and visitor use in the GTSR corridor.*

5. **COMMENT:** The EA states on p. 11 under *Park Operations* that "The proposed expansion of the parking lot would not require additional staff or change existing park operations." Do existing park operations plow the transit center parking lot in the winter? Would the expanded parking lot be plowed?

RESPONSE: *The transit center parking lot is not plowed during winter; the parking lot is plowed during spring plowing operations. The parking lot will likely be plowed once visitor center operations are moved to the transit center, but plowing would be necessary due to the upcoming relocation of visitor center*

operations, and not because of the parking lot expansion. It is not known how extensive the plowing will be, as it is unlikely that the entire parking lot will need to be open. This EA is not evaluating the relocation of visitor center operations, since the relocation was already decided upon in the 1999 General Management Plan/Final EIS and Record of Decision. This EA evaluates only the parking lot expansion, which will not affect park operations.

6. **COMMENT:** Glacier needs to adopt a "no net loss policy" whereby if one area is developed, another area is restored. For example, if the lot is expanded, then the next time the park acquires an inholding, the buildings should be torn down and the property should be restored to its natural state. This could already be accomplished with properties the park owns, such as buildings that are empty and in disrepair.

RESPONSE: *The development and establishment of a "policy" is beyond the scope of this project. The park regularly restores disturbed areas to mitigate impacts to park resources, especially during projects involving ground disturbance. Additionally, the park has removed structures and facilities that are no longer needed, such as the Roberts's Cabin and a small garage on Lake McDonald, a backcountry cabin on Reynold's Creek, the Opalka cabin in the North Fork District, and a number of river access roads along the Inside North Fork Road. Several of these sites have been restored with native vegetation. Other structures and developments have been removed over the years and in general, the human footprint in the park is smaller than it was 50 years ago.*

7. **COMMENT:** Something meaningful needs to be done with the old Apgar Visitor Center building. The building needs to be used for something that will enhance the visitor experience. Perhaps it could be the site of specialized interpretive exhibits or a place to meet rangers or ask questions.

RESPONSE: *The park is considering a number of options for this site and the building, but this is outside the scope of this project.*

8. **COMMENT:** The new visitor center at the transit center should include information about and telephone access to the park's concessioners. When visitors come to the park, they want information about what activities they can do and it only makes sense to have that information readily available to them in the ATC visitor center.

RESPONSE: *Concessions brochures are on display at all visitor centers in the park and are available either upon request or for visitors to pick up. The park has given concessioners the option to collectively pay for installation of a phone outside the transit center building that visitors could use for direct dialing. The NPS does not have the funds to pay for the phone and, since space is limited, would not permit its installation inside the building.*

9. **COMMENT:** Consider addressing a connection between the Apgar Ranger Station and the transit center area. Visitors do not use what they cannot see. Most visitors do not understand how close the transit center parking lot is to the launch and village. A road somewhere in the vicinity of the ranger station, connecting Lake View Drive to the transit center is appropriate.

RESPONSE: *A road between Lake View Drive (also known as the Apgar Loop Road) and the transit center is not necessary given the proximity between the transit center and surrounding developments. A signed path connects the transit center with Apgar Village and, by way of the Apgar Campground, the boat launch area. Also, a road from the ranger station to the transit center would bisect an*

area that provides a buffer for wildlife from human activity, and would result in unnecessary, long-term, adverse impacts to vegetation and soils, including an increased susceptibility to invasion from non-native invasive plants. A road and vehicle traffic through the area would also increase the level of noise and disturbance to visitors at Apgar Campground.

Appendix A – Non-Impairment Finding

National Park Service's *Management Policies* 2006 require analysis of potential effects to determine whether or not actions would impair park resources. The fundamental purpose of the national park system, established by the Organic Act and reaffirmed by the General Authorities Act, as amended, begins with a mandate to conserve park resources and values. National Park Service managers must always seek ways to avoid, or to minimize to the greatest degree practicable, adversely impacting park resources and values.

However, the laws do give the National Park Service the management discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, as long as the impact does not constitute impairment of the affected resources and values. Although Congress has given the National Park Service the management discretion to allow certain impacts within parks, that discretion is limited by the statutory requirement that the National Park Service must leave park resources and values unimpaired, unless a particular law directly and specifically provides otherwise. The prohibited impairment is an impact that, in the professional judgment of the responsible National Park Service manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values. An impact to any park resource or value may, but does not necessarily, constitute an impairment. 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
- identified as a goal in the park's general management plan or other relevant NPS planning documents.

An impact would be less likely to constitute an impairment if it is an unavoidable result of an action necessary to pursue or restore the integrity of park resources or values and it cannot be further mitigated.

The park resources and values that are subject to the no-impairment standard include:

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

Impairment may result from National Park Service activities in managing the park, visitor activities, or activities undertaken by concessioners, contractors, and others operating in the park. The NPS's threshold for considering whether there could be impairment is based on whether an action will have significant effects.

Impairment findings are not necessary for visitor use and experience, socioeconomics, public health and safety, environmental justice, land use, and park operations, because impairment findings relate back to park resources and values, and these impact areas are not generally considered park resources or values according to the Organic Act, and cannot be impaired in the same way that an action can impair park resources and values. After dismissing the above topics, topics remaining to be evaluated for impairment include vegetation and plant species of concern, soils, wildlife, natural soundscapes, and visual resources.

Fundamental resources and values for Glacier National Park are identified in the 1999 *General Management Plan*. According to that document, of the impact topics carried forward in this EA, all but visitor use and experience are necessary to fulfill specific purposes identified in the establishing legislation of the park; are key to the natural or cultural integrity of the park; and/or are identified as a goal in the park's *General Management Plan* or other relevant NPS planning document.

- **Vegetation and Plant Species of Concern.** The permanent loss of 0.9 acre of vegetation, increased susceptibility to invasion from non-native plants, changes in the shade regime, future hazard tree removal, and the temporary disturbance of approximately 0.3 acre will have minor adverse impacts to vegetation. There will be minor to moderate adverse impacts to velvetleaf huckleberry from the disturbance of less than 1% of the known population. Although vegetation and plant species of concern are a fundamental resource at the park, the preferred alternative will only result in minor to moderate, short and long-term, site-specific adverse impacts to vegetation and plant species of concern; therefore, there will be no impairment to vegetation and plant species of concern.
- **Soils.** The project will result in permanent compaction and loss of soil productivity on 0.9 acre and the temporary disturbance of soils and an increased susceptibility to invasion from non-native invasive plants on approximately 0.3 acre, with minor adverse impacts to soils. Although soils are a fundamental resource at the park, the preferred alternative will only result in minor, short and long-term, site-specific adverse impacts to soils; therefore, there will be no impairment to soils.
- **Wildlife.** Disturbance, displacement, and habitat loss will cause negligible to minor adverse impacts to wildlife. Although wildlife are a fundamental resource at the park, the preferred alternative will only cause negligible to minor, short and long-term, and site-specific adverse impacts to wildlife; therefore, there will be no impairment to wildlife.
- **Natural Soundscapes.** Noise during the construction period will have moderate adverse impacts to natural soundscapes. Although natural soundscapes are a fundamental resource at the park, the preferred alternative will only result in moderate, short-term, site-specific adverse impacts to natural soundscapes; therefore, there will be no impairment to natural soundscapes.
- **Visual Resources.** Changes to the immediate forested viewshed, the visibility of recreational vehicles from the entrance road, and construction activity will have negligible to minor adverse impacts to visual resources. Although visual resources are a fundamental resource at the park, the preferred alternative will only result in negligible to

minor, short and long-term, site-specific adverse impacts to visual resources; therefore, there will be no impairment to visual resources.

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