

schmierer
Tuovinen
Joss

L7617 (PWRO-P)

JUL 07 2017

Memorandum

To: Superintendent, Oregon Caves National Monument and Preserve

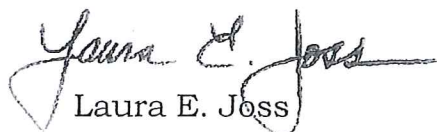
From: Regional Director, Pacific West Region

Subject: Environmental Compliance for Chateau Improvements

The *Finding of No Significant Impact* (FONSI; received on June 26, 2017) concerning Chateau safety and accessibility enhancements, as well as basic repairs to infrastructure, is approved.

To complete this particular environmental compliance effort, the FONSI and Errata for the Environmental Assessment should be made available to all individuals and organizations that received or commented on the supporting draft environmental assessment.

Our understanding is that a Weekly Report summary has been timely provided to PWR Public Affairs, thank you.


Laura E. Joss

Attachment

cc:

PWR-FM

FNP:ASchmierer:as:6\27\17:(415)623-2315:(orcaChateauImprov)

OREGON CAVES NATIONAL MONUMENT AND PRESERVE
NON-IMPAIRMENT DETERMINATION
CORRECT LIFE SAFETY AND OTHER DEFICIENCIES IN THE OREGON CAVES CHATEAU
PMIS 150025

By enacting the National Park Service (NPS) Organic Act of 1916 (Organic Act), Congress directed the US Department of Interior and NPS to manage units “to conserve the scenery and the natural and historic objects and wildlife therein and to provide for the enjoyment of the same in such a manner and by such a means as will leave them unimpaired for the enjoyment of future generations” (54 United States Code [USC] § 100101). Congress reiterated this mandate in the Redwood National Park Expansion Act of 1978 by stating that NPS must conduct its actions in a manner that will ensure no “derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress” (54 USC 100101).

NPS *Management Policies 2006*, section 1.4.4, explains the prohibition on impairment of park resources and values.

“While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the Nation Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them.”

NPS has discretion to allow impacts on park resources and values when necessary and appropriate to fulfill the purposes of a park (NPS *Management Policies 2006*, section 1.4.3). However, NPS cannot allow an adverse impact that would constitute impairment of the affected resources and values (section 1.4.3). An action constitutes an impairment when its impacts “harm the integrity of Park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values” (section 1.4.5). To determine impairment, NPS must evaluate “the particular resources and values that would be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts” (section 1.4.5).

This determination on impairment has been prepared for the selected action described in this Finding of No Significant Impact. An impairment determination is made for the resource topic of cultural resources – historic buildings, structures and districts. An impairment determination is not made for socioeconomics, visitor use and experience, and human health and safety because impairment findings relate back to park resources and values, and these impact topics are not generally considered to be 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.

HISTORIC BUILDINGS, STRUCTURES AND DISTRICTS

The fire safety and accessibility improvements under the selected action will have adverse impacts on the National Historic Landmark Chateau within the Oregon Caves Historic District. The Chateau is significant due to its architectural design based on the creative use of the limited building spaces or footprints and the way in which the designer allowed the site to dictate major architectural choices. While the limited changes that will occur to the exterior of the building may result in adverse impacts, these changes will not significantly alter the overall character of the historic district and associated cultural landscape. Similarly, while the interior fire safety and accessibility and utility improvements will alter

some historic fabric, the overall benefit of this action will be to protect the historic fabric against leaks and fire events. The most notable impact will result from the construction of an elevator, which will intrude on the character-defining feature of the open lobby area. Preliminary designs of the elevator situated the elevator in the least intrusive location on the first floor and remove minimal public lobby area and more staff office area, limiting the overall impact. The interior changes will neither diminish the overall character or quality of the structure nor result in the diminishment of the enjoyment and appreciation of the structure and will protect the Chateau so future generations can enjoy it. Therefore, the historic district will not be impaired because its fundamental character will not be significantly altered and the Chateau, while experiencing adverse impacts, will be preserved with the least amount of intrusion to the historic fabric and character-defining features needed to correct the life safety and other deficiencies noted in the EA.

WILDLIFE

Special-status species known to occur in and around the park include northern spotted owl (*Strix occidentalis caurina*), fisher (*Martes pennanti*), and Townsend's big-eared bat (*Corynorhinus townsendii*). Only one species, the northern spotted owl (*Strix occidentalis caurina*), is known to exist in the vicinity of the Chateau and is the only one expected to occur, given the habitat requirements of the other species.

Spotted owls were known to historically occur about one half mile from the Chateau. However, in 2011, the same year same year barred owls (*Strix varia*), were detected at the park for the first time, the NPS failed to detect spotted owls within two miles of the project area. Barred owls, a known competitor with spotted owls, make the presence of spotted owls unlikely. Studies¹ show that the presence of barred owls is associated with displacement and decreased detectability of spotted owls. Surveys in spring 2016 resulted in no audio or visual detections of spotted owls. In spring 2017, the park had one visual detection of a spotted owl. Surveys will continue to be conducted until construction, and results shared with USFWS. Additional mitigation will be included, if deemed necessary.

In June 2016, USFWS concurred with the NPS that the exterior work not adversely affect spotted owls because of the conservation measures the Monument plans to implement to avoid and minimize effects to spotted owls, including pre-project protocol surveys. This conservation measures are listed under Mitigation on page 4, and would avoid and minimize effects to spotted owls. The selected action will occur almost entirely within the Chateau; therefore, no rare, threatened, or endangered wildlife species or known habitat is expected to be affected.

Further, the Chateau is within a heavily public area, and has existing noise levels associated with visitor vehicles, buses, delivery trucks, etc. If northern spotted owls were to move back into the area, the following mitigation would lessen the effects: 1) Use of only low noise construction methods outside and inside the building, including laying the foundation for the external balconies, during the non-nesting season for spotted owls (August 1 – March 1) 2) Require larger combined spread footings, thereby eliminating the potential risk of the contractor using the noise and vibration-producing pile driving method for constructing the foundations of the balcony's steel frames and 3) Ensure that no noise will rise to the level of a chain saw, jackhammer or rock drill by using environmentally-focused engineering design methods so as to avoid disturbance to spotted owls (during the critical breeding season, March 30-June 30) that might be within the monument at the time of construction.

¹ Barred Owls and Landscape Attributes Influence Territory Occupancy of Northern Spotted Owls; Sovern et.al; The Journal of Wildlife Management 78(8):1436–1443; 2014; DOI: 10.1002/jwmg.793

**NATIONAL PARK SERVICE
US DEPARTMENT OF THE INTERIOR**



Oregon Caves National Monument and Preserve

**FINDING OF NO SIGNIFICANT IMPACT
Correct Life Safety and Other Deficiencies in the Oregon Caves Chateau**

**PMIS 150025
June 2017**

INTRODUCTION

The National Park Service (NPS) proposes to implement life and fire safety improvements to the existing Chateau at the Oregon Caves National Monument and Preserve (the park) to better meet safety and accessibility code requirements. The improvements are needed to improve egress and provide other fire safety enhancements, properly address critical life-safety requirements, and improve the physical accessibility of the building to accommodate individuals with mobility impairments. Additionally, repairs to basic infrastructure will occur at the Chateau. The improvements are needed to prevent the deterioration and possible closure of this National Historic Landmark (NHL).

NPS prepared an environmental assessment (EA) that evaluated three alternatives: a no-action alternative and two action alternatives and analyzed the potential impacts that these alternatives would have on the natural, cultural, and human environment. The *Correct Life Safety and Other Deficiencies in the Oregon Caves Chateau Environmental Assessment* (2016) was prepared in accordance with National Environmental Policy Act and its implementing regulations (40 Code of Federal Regulations [CFR] 1500–1508.9) and with NPS Director's Order 12: *Conservation Planning, Environmental Impact Analysis, and Decision-making* (2011) and its accompanying handbook (2015).

PURPOSE AND NEED

The purpose of the project is to improve visitor and employee safety by implementing improvements to bring the Chateau into closer compliance with contemporary building, fire protection, and accessibility standards in a way that minimally affects the distinguishing qualities and character-defining features of this NHL.

The actions are needed to ensure code-compliant emergency egress and fire protection that will protect occupants and ensure the safety and longevity of the building. Completed in 1934, the architecturally complex Chateau has significant barriers to accessibility. This project will also provide accessibility to the lobby, restrooms, dining areas, and five guest rooms in accordance with federal laws and regulations and NPS accessibility policy.

DESCRIPTION OF THE SELECTED ALTERNATIVE

Based on the analysis presented in the EA, NPS selected Alternative 2 (the NPS preferred alternative) as the action for implementation. The selected action is described beginning on page 15 (Elements Common to All Action Alternatives) of the EA and continues through page 22 (Alternative 2: Proposed Action – Rehabilitation of the Chateau).

The NPS will implement a slightly modified version of the preferred alternative that was presented in the EA. These minor changes do not result in any change in the determination of the degree of environmental impact. They include:

- Elements Common to All Action Alternatives – Correct Visitor and Staff Accessibility Deficiencies: In addition to providing physical access to hotel guest rooms on the first-floor, accessibility improvements will also include guest rooms with communication features which will be dispersed throughout other floors as required per Architectural Barriers Act Accessibility Standards (ABAAS). The number of guest rooms having the communication features has not been identified but at least one on each floor will be provided.
- The EA states that the park would provide limited food service during construction. Temporary food service would be provided if practicable, but cannot not be guaranteed.

The selected alternative will add two new guest rooms for overnight use. The two phases of construction could last up to a maximum of 18 months. The selected action consists of the below elements.

Life and Fire Safety Improvements

Flammable materials, such as existing fiberboard finishes, will be removed from all floors of the building and will be replaced with fire-resistant wall finishes similar in appearance to existing finishes. A one-hour fire wall will also be installed in the attic and laundry, refrigeration equipment, and waste/linen storage areas. Ignition hazards will be reduced by improving the exhaust and ventilation systems in the kitchen and staff dining room and by upgrading the building's electrical system. Wiring will be replaced throughout the Chateau, additional outlets will be installed, and light fixtures will be rehabilitated. Multiple service panels will be consolidated into a single panel.

An improved fire alarm and sprinkler system will be installed, including electrical upgrades to the overall fire system, an automatic dialer to the fire department, notification speakers and horn/strobe devices in occupied areas, manual pull stations at exit doors, and smoke sensors in heated portions of the building. Sprinkler system upgrades will include installing updated sprinkler heads, flushing interior pipe rust, and altering sprinkler head replacements for more efficient and comprehensive water coverage.

Emergency fire egress will be improved through the installation of exit signs, emergency lighting, and new fire doors with magnetic holds wired to the alarm system that allow visitors and employees to exit the building more easily during an emergency. Glass draft curtains and additional sprinkler heads will provide added protection to stairwell areas. New emergency exit doors will be installed in the first basement and in each staff bedroom, and upgrades will be made to existing egress doors in the first, second, and third basements. Exterior landings, rails, staircases, and other external egress improvements will be installed as applicable, and fire escapes will be replaced with ones that will be compatible with the building's historic appearance. Interior staircases will also receive safety upgrades, including handrails and glass stair enclosures, and a new staircase between the top two floors will be added.

Construction and Utility Improvements

Upgrades to the building will include overall construction and utility improvements such as bolted rods to tie beams and columns together to provide added structural support. During removal and replacement of wall and ceiling finishes, shear walls and insulation will be installed, and the plumbing, sprinkler, and heating systems will be upgraded. The three-level balcony structure on the building's west elevation may be reconstructed to be compatible with the building's original historic structure and reinforced with a new steel superstructure located behind and under the wood framing. It is possible that the balcony reconstruction may take place as a separate time due to funding; however, the installation of the balconies is included as part of the overall proposed action to improve the Chateau in this EA.

Visitor and Staff Accessibility Improvements

Visitor and employee accessibility improvements will be made to comply to the fullest possible extent with the Architectural Barriers Act (ABA) (42 United States Code [USC] 4151 et seq.). Paths, ramps, railings, and entry landings will provide ease of entry to the interior of the building and will enable visitors with disabilities to enter the lobby area of the Chateau from the park's closest parking lot. Accessibility

improvements will also be made to the lobby registration desk and coffee shop, including removal of two seats in the coffee shop to provide for accessible seating at the counter. Doors and door hardware will be retrofitted as necessary. A full-size elevator shaft and elevator will be installed between the first floor and the first basement level. The elevator will extend to the second basement, providing access to these areas for individuals with disabilities. All five first-floor guest rooms will be converted to accessible rooms, and a ramp will be constructed to provide access from the first floor lobby to the first floor guest rooms. Accessible restrooms will be provided on the first basement (dining room) level for public use and on the second basement level for staff use. Similar to the public areas of the building, accessibility improvements will be made to the employee areas of the building, including providing accessible ramps where applicable in the second basement employee areas, providing separate accessible restrooms for both genders, and upgrading doors and hardware as necessary.

MITIGATION MEASURES

The selected action incorporates the mitigation measures and best management practices provided below. NPS can add additional mitigation measures and best management practices to this list in the future at its discretion. In addition, as a result of consultations with the Oregon State Historic Preservation Office (SHPO) that resulted in the signing of a Programmatic Agreement (Appendix C), the SHPO and NPS have discussed preliminary design considerations to mitigate the adverse effects associated with the Chateau's rehabilitation (Appendix B).

Human Health and Safety

- NPS will require the construction contractor to follow NPS construction contract standards during construction, including implementing an accident prevention program, installing warning signs at the construction site and along the nearby parking lot, and installing and maintaining construction fences around the construction sites to prevent non-contractors and the public from entering the construction areas.
- All NPS-wide and park-specific safety policies and procedures will be followed throughout the project.

Historic Buildings, Structures and Cultural Landscapes

- NPS staff that meet the Secretary of the Interior's *Historic Preservation Professional Qualifications Standards* will be involved in the review of construction documents during project design to ensure that adverse effects are minimized.
- Temporary fire detection and suppression systems will be in place during construction and will be the responsibility of the contractor (i.e., there will be no "down time" with regard to fire and security protections for the Chateau). A hot work permit, if required, will be acquired.
- All work will be guided by the Secretary of the Interior's *Standards for the Treatment of Historic Properties* (NPS 1995) and *NPS Management Policies 2006* (NPS 2006).

Threatened and Endangered Species

- The contractor(s) will be restricted to low noise construction methods outside and inside the building and will only lay the foundation for the external balconies during the non-nesting season for spotted owls (August 1–March 1).
- Noise abatement will include specifying larger combined spread footings, thereby eliminating the potential risk of the contractor using the noise and vibration-producing pile driving method for constructing the foundations of the balcony's steel frames.

- Other environmentally focused engineering design methods will ensure that no noise will rise to the level of a chain saw, jackhammer, or rock drill to avoid disturbing spotted owls that might be in the park at the time of construction during the critical breeding season, March 1–June 30.
- Prior to the beginning of the proposed construction activities in 2019, the park plans to conduct pre-project surveys for spotted owls (USDI FWS 2012) beginning in spring 2016. If spotted owls are detected and nesting is confirmed within the disruption distance of proposed construction activities or routine park maintenance, the park will implement seasonal restrictions that limit work to outside the breeding season. In addition, the park will re-initiate consultation with the US Fish and Wildlife Service (USFWS) to discuss additional mitigation measures, if needed.

OTHER ALTERNATIVES CONSIDERED

Alternative 1: No Action Alternative

Under Alternative 1, life and fire safety improvements to the Chateau to provide for visitor safety and accessibility would not occur. The existing level of accessibility of the building for persons with disabilities would remain unchanged. Current operation and maintenance practices would continue at the Chateau. The Chateau would continue to be open from May to October, and staffing levels at peak visitation time would be expected to continue at the current level of 41 employees. The Chateau would continue to operate 24 overnight guest bedrooms.

Alternative 3: Conversion of Chateau to a Day Use Facility

Similar to Alternative 2, this alternative includes multiple improvements to correct life and fire safety issues and address accessibility deficiencies to repair and rehabilitate the Chateau. However, the emphasis of Alternative 3 is creating a day use facility with accessible visitor accommodations limited to the lobby, dining area, and gift shop, located on the first floor and first basement levels. No overnight accommodations would be provided under Alternative 3.

ALTERNATIVES CONSIDERED AND DISMISSED

Provide Elevator Access to the Second Floor

The team evaluated various configurations to install an elevator to access guest rooms located above the first floor level; however, this option was eliminated because of the significant loss of historic fabric anticipated with the elevator installation, risks associated with providing a safe place of refuge for visitors with physical disabilities, and concern regarding the impact on the main structural system. Comparable dispersion of visitors with physical disabilities in available room type (configuration, view, and bed type) can be accommodated on the main floor under the preferred alternative.

Install External Elevator to Minimize Reconfiguring of Interior Spaces

Under this option, a three-level, full-sized exterior elevator would be provided between the first basement, lobby level, and second floor guest room level. This option would have potential adverse effects on the NHL status of the Chateau as a result of the significant impacts on the exterior appearance because of the amount of exterior fabric and features that would be destroyed. The amount of exterior and interior fabric destroyed with the installation of an exterior elevator would be much greater than the changes required by the internal elevator. The external elevator could not be located near the existing internal staircase and, therefore, would create new and circuitous circulation patterns. Access for people with disabilities would be separated from existing stairs, a practice that is discouraged by accessibility guidelines. The surrounding landscape would also be affected because the area around the Chateau is not level, and construction would require extensive earthwork. After consultation with the Oregon SHPO, this alternative element was dismissed.

Provide All Program Functions on the Lobby Level and Ramped Access to Lobby Level Guest Rooms

Under this option, no elevator would be installed, and space and service for dining would be provided in the lobby area. Food could be conveyed to the lobby by the extension of the existing dumb waiter to the lobby level to avoid wait staff having to carrying trays up and down the main staircase. Extension of the dumb waiter to the lobby level would interrupt the historically significant character defining space (described in detail in chapter 3). The open character of the lobby, views through the many windows, and appearance of the massive fireplace would be interrupted by the dumb waiter. Without the dumb waiter to the lobby level, concession wait staff would be required to carry all food up the main staircase used by guests, creating an unsafe, hazardous condition where staff and visitors could be injured. Without the elevator, people with disabilities would be unable to access the first basement (dining level). Therefore, this alternative was dismissed.

Complete Closure of the Chateau

Under this option, the Chateau would completely close. No life safety or accessibility issues would be addressed, and visitors would no longer have access to the Chateau. Visitor services for cave visitors would be greatly affected. Limited restrooms would be available to members of the public visiting the park. Food service and lodging would no longer be offered within the park—the closest available food and lodging options would be located more than 20 miles away in Cave Junction.

There would be a risk that both the exterior and the interior of the historic Chateau would deteriorate through lack of use. Neither routine nor cyclic maintenance would be completed on the building, which would lead to failures of infrastructure and adversely affect the historic fabric of the Chateau. For example, leaking pipes could go undetected for longer periods. Exterior components, such as roofs and siding would not be maintained and would eventually fall into a state of disrepair and provide a source for water and pest intrusion into the building. An absence of environmental controls (such as heating and cooling) would also accelerate deterioration of the Chateau because changes in temperature would damage building materials as they expand and contract over time. As a result, NPS would be required to incur operations and maintenance costs as part of its responsibility under the Secretary of the Interior's order to maintain and preserve the NHL.

While the Chateau would provide no visitor use or socioeconomic benefits within the park, the total cost of facility ownership burden on NPS would continue as a result of operations and maintenance, preventative, and emergency costs (e.g. roofing, water, and lighting). This alternative would not improve visitor and employee safety or bring the Chateau into compliance with modern-equivalent building, fire protection, and accessibility standards and would have substantial, adverse effects on the distinguishing qualities and character-defining features of the NHL. As a result, this alternative would not meet the purpose of and need for the project and was therefore rejected.

Replace Non-Fire Resistant Fiberboard with the Same Type of Non-Fire Resistant Fiberboard to Retain the Exact Appearance of the Wall and Ceiling Finish

The same type of fiberboard material is no longer produced and is therefore not available. In addition, this fiberboard would not be code compliant. This element would not comply with the purpose of and need for the project and was dismissed. Alternative methods to simulate the appearance of the fiberboard or similar material over sheetrock that adequately provide the code-required fire resistance have been developed, tested, and will be used in the selected alternative.

Reconstruct Historic Balconies with the Same Wood Materials as Originally Constructed

The original balconies failed as a result of the deterioration of wood from exposure to rain and the weight of snow; therefore, reconstruction with the same materials would be historically accurate but would not be a good value for the government because of the extensive maintenance and periodic replacement that would be required. NPS must also consider the total cost of facility ownership, and this alternative is not sustainable

because extensive maintenance would be required. This alternative element would not be consistent with the purpose of and need for the project and was dismissed.

RATIONALE FOR THE SELECTED ALTERNATIVE

The preferred alternative was selected for implementation because it better meets the purpose and need of the project while preserving park resources than either the No Action Alternative or Alternative 3. The rationale for the selected alternative is noted below in the discussion of how it meets the criteria in the Council on Environmental Quality (CEQ) National Environmental Policy Act (NEPA) regulations.

These guidelines require that the "agency in reaching its decision [specify] the alternative or alternatives which were considered to be environmentally preferable" (CEQ Regulations, section 1505.2). 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 Responsible Official identifies the environmentally preferable alternative by considering and weighing the long-term environmental impacts against short-term impacts in evaluating what is the best protection of these resources (40 CFR 1505.2(b)).

In accordance with the criteria outlined in NEPA and Director's Order 12, an environmentally preferable alternative meets the following criteria: (1) fulfills the responsibilities of each generation as trustee of the environment for succeeding generations; (2) ensures for all Americans, safe, healthful, productive, and aesthetically and culturally pleasing surroundings; (3) attains the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences; (4) preserves important historic, cultural, and natural aspects of national heritage and maintains, wherever possible, an environment that supports diversity and variety of individual choice; (5) achieves a balance between population and resource use that will permit high standards of living and wide sharing of life's amenities; and (6) enhances the quality of renewable resources and approaches the maximum attainable *recycling of resources*.

The selected alternative meets all applicable criteria above with limited impacts on the natural environment and mitigates impacts on the cultural environment to the extent feasible. Alternative 2 minimizes impacts on the culturally significant areas of the Chateau while providing a safe and more efficient space for visitors (criteria 2, 3, 5 and 6). Alternative 2 improves the ability to prevent and contain any fire event within the Chateau, ensuring it remains preserved for future generations to experience (criteria 1 and 4).

The No Action Alternative does not address any of these criteria. While Alternative 3 meets these criteria, it does so to a lesser degree than the selected alternative because it does not continue the historic use of the Chateau as a hotel and would not provide as much barrier-free access.

WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT

Using the ten significance criteria as defined in the CEQ's NEPA regulations (Section 1508.27), NPS has determined that the selected alternative can be implemented with no significant adverse impacts. The following criteria were used to determine the significance of each impact.

1. Impacts that may be both beneficial and adverse. A significant effect may exist even if the federal agency believes that on balance the effect may be beneficial.

All potential impacts were identified in the EA and none rise to the level of significance. The selected alternative has a large number of benefits to visitor and staff safety, accessibility, and visitor use. The negative effects will affect historic structures and districts and socioeconomics. The socioeconomic impacts from the closure of the Chateau will be noticeable, but not significant and will only occur during the construction period. Adverse and beneficial impacts on the Chateau are discussed in detail under criterion 8.

Adverse impacts on visitors and local workers will occur mostly during the 18-month construction period. During that time, the Chateau will be closed to the public, and employment for the current 41 staff members will be discontinued. The remainder of the park will be open during the construction period, with appropriate warning signs at the Chateau and construction staging areas to prevent visitors from accidentally entering the work site. Once the Chateau is operational again, its operating season may be extended as a result of improvements to the insulation in the building, which could extend seasonal employment opportunities in the future. In the long term, impacts from improved accessibility for both visitors and staff and a potentially longer open season for the Chateau will be beneficial.

2. The degree to which the selected alternative affects public health and safety.

The selected action will improve public safety by reducing fire risk, improving fire response, and improving accessibility through the first floor and first basement.

3. Unique characteristics of the area (proximity to historic or cultural resources, wild and scenic rivers, ecologically critical areas, wetlands or floodplains, and so forth).

The action will take place in an NHL and a historic district. All impacts on cultural resources are discussed under criterion 8.

4. Degree to which impacts are likely to be highly controversial.

During both public scoping and public review of the EA, the public was generally supportive of the life safety improvements. During public review of the EA, some members of the public disagreed with the degree of socioeconomic impact the closing of the Chateau would have on employees and the overall local economy. While the majority of comment letters supported the selected action, commenters requested that the construction period be as short in duration as possible, mitigate the *loss of Chateau jobs during the construction period, and complete additional construction projects* during the closure period to eliminate the need for a second closure period for the Chateau. Although there was some disagreement about the nature of the effects, it does not rise to the level of being highly controversial.

5. Degree to which impacts are highly uncertain or involve unique or unknown risks.

No highly uncertain or unique or unknown risks are associated with the selected action.

6. Whether the action may establish a precedent for future actions with significant effects, or represents a decision in principle about a future consideration.

The selected alternative neither establishes a precedent for future actions with significant effects, nor represents a decision in principle about a future consideration.

7. Whether the action is related to other actions that may have individual insignificant impacts but cumulatively significant effects.

The impacts of the selected alternative on each impact topic were identified in the EA. Cumulative impacts on each resource were also identified and none will have cumulatively significant effects.

8. Degree to which the action may adversely affect historic properties in or eligible for listing in the National Register of Historic Places, or other significant scientific, archeological, or cultural resources.

The selected action will have adverse impacts on the Chateau, which is an NHL in a historic district. Some actions, including the construction of the elevator, will alter character-defining spaces in the Chateau and affect its historic fabric. While fire and safety and accessibility improvements will result in adverse impacts on historic fabric, these actions will also result in beneficial impacts because they will prevent future damage from leaks or fire hazards. Overall, the Chateau will continue to be used

for its historic use as a hotel with improved accessibility and protection from fire events. The selected action will neither diminish the overall character or quality of the building nor diminish the enjoyment and appreciation of the building. The selected action includes exterior accessibility improvements that may adversely affect the historic district and associated cultural landscape.

9. Degree to which an action may adversely affect an endangered or threatened species or its habitat.

Special-status species known to occur in and around the park include northern spotted owl (*Strix occidentalis caurina*), fisher (*Martes pennanti*), and Townsend's big-eared bat (*Corynorhinus townsendii*). The selected action will occur almost entirely within the Chateau; therefore, no rare, threatened, or endangered wildlife species or known habitat is expected to be affected. Of these species, only the northern spotted owl has potential to be present in the project area. At the time of release of the EA, spotted owls had not been seen near the Chateau since 2011, the same year barred owls were detected at the park for the first time. Studies¹ show that the presence of barred owls is associated with displacement and decreased detectability of spotted owls. Surveys in spring 2016 resulted in no audio or visual detections of spotted owls. In spring 2017, the park had one visual detection of a spotted owl. Surveys will continue to be conducted until construction, and results shared with USFWS. Additional mitigation will be included, if deemed necessary by the NPS and USFWS.

10. Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment.

The selected alternative does not violate any federal, state, or local law, or requirements imposed for protection of the environment.

PUBLIC INVOLVEMENT

Scoping

Internal scoping was completed at the park on November 8, 2011, when representatives from the park, Pacific West Region, Denver Service Center, and the consultant team (together, the planning team) met at the park. The planning team discussed the purpose of and need for the project, potential design alternatives that could meet these needs, and resource conditions and issues in the project area. After discussing the preliminary alternative options, the planning team determined which impact topics should be analyzed in the EA. The team also initiated plans for public involvement activities.

Public scoping for the EA began with the issuance of a scoping letter on April 23, 2012, and concluded on May 21, 2012. A public scoping meeting was held at the Chateau on May 12, 2012, from 10:00 a.m. to 4:00 p.m. Notice of the public scoping period was posted on the Planning, Environment, and Public Comment (PEPC) website and sent to the park's mailing list. During the public scoping period, NPS received eight pieces of correspondence from the public. Six correspondences were received through the PEPC system, and two were submitted via the comment form distributed at the public scoping meeting. All commenters supported rehabilitation, and most commenters expressed specific support for the alternatives that increased accessibility for individuals with disabilities and improved fire detection and suppression. Two commenters expressed concern regarding the potential use of an elevator and its impacts on the character of the building, while one commenter did not support any accessibility improvements. Three commenters recommended that the proposed project seek to support the local community and economy and recommended the establishment of a HUB Zone² to support small businesses.

¹ Barred Owls and Landscape Attributes Influence Territory Occupancy of Northern Spotted Owls; Sovern et.al; The Journal of Wildlife Management 78(8):1436–1443; 2014; DOI: 10.1002/jwmg.793

²The Historically Underutilized Business Zones (HUB Zone) program, operated by the US Small Business Administration, helps small businesses in urban and rural communities gain preferential access to federal procurement opportunities <http://www.sba.gov/hubzone/>.

Review of the EA

The formal public review period for the EA began on June 1, 2016, and extended through July 22, 2016. The NPS printed fifteen copies of the EA for distribution to federal and state agencies and interested organizations. NPS also announced the public release of the EA and invited public comment through a press release and notice on the project website (<http://parkplanning.nps.gov/orca>). During the EA public review period, 14 correspondences were received. All commenters supported the project, with the majority favoring Alternative 2. Several commenters expressed concern for the socioeconomic impacts associated with the closure of the Chateau. Commenters also requested that NPS complete additional necessary projects during the closure period to prevent the need for a second Chateau closure in the near future. All substantive public comments and NPS responses are provided in Appendix A.

CONSULTATION AND COORDINATION

State Historic Preservation Office

NPS initiated consultation with the Oregon State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation (ACHP) under Section 106 of the National Historic Preservation Act (NHPA) on August 18, 2010. In September 2010, the ACHP declined to participate as a consulting party. NPS continued informal consultation with the SHPO in 2011, providing background information and initial alternative concepts. NPS staff from the park, Denver Service Center, and the region met with the SHPO on November 9, 2011, and September 29, 2015, to continue to discuss the proposed improvements to the Chateau.

The NPS and SHPO entered into a Programmatic Agreement (PA) to establish a formal process for NPS and SHPO review of future design development documents in order to evaluate how project design and specifications may affect character defining characteristics of the Chateau and historic district, as well as *collaboratively assess and resolve potential adverse effects through the development of appropriate mitigation*. The NPS subsequently notified the ACHP of the development of the PA and the ACHP declined to participate in the consultations to develop the PA on January 12, 2017. Execution of the PA completes the requirements of Section 106 of the NHPA.

The Friends of the Oregon Caves Chateau and the Illinois Valley Community Development Organization participated in the Section 106 consultations for the undertaking and signed the PA as concurring parties.

Tribal Consultation

Members of several tribes (Umpqua, Cow Creek, and Grand Ronde) have made overlapping territorial claims on broad geographic ranges that have included the park, although no tribes consulted during a cultural affiliations study mentioned the park specifically (Deur 2007). Representatives from all three tribes were on the mailing list and received notice of the project. No tribes provided comment on the EA.

US Fish and Wildlife Service

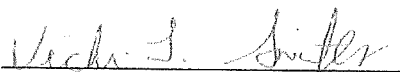
Section 7 of the Endangered Species Act requires federal agencies to consult with US Fish and Wildlife Service (USFWS) regarding proposed actions to ensure that any action it authorizes, funds, or carries out is not likely to jeopardize the continued existence of listed species or result in the destruction or adverse modification of critical habitat. Six federally listed species occur in Josephine County; however, only one species, the northern spotted owl (*Strix occidentalis caurina*), is known to exist in the vicinity of the Chateau and is the only one expected to occur. On April 12, 2016, the NPS initiated informal consultation with USFWS, and requested concurrence that the project will not adversely affect northern spotted with the implementation of four conservation measures that would avoid and minimize impacts. On June 15, 2016, USFWS concurred that the project, with recommended conservation measures, will not adversely affected spotted owls.

At the time of the EA public release, northern spotted owls had been spotted near the Chateau since 2011, the same year barred owls were detected at the park for the first time. The conservation measures included conducting pre-project surveys for northern spotted owls (USDI FWS 2012), beginning in spring 2016. The park did not audio-detect nor view any northern spotted owls within disruption distances of planned construction activities adjacent to the Chateau in spring 2016. During the spring 2017 survey, the park had one visual detection of a one northern spotted owl; a nest was not confirmed. Results of the yearly surveys will be shared with the USFWS. Additional mitigations will be included, as deemed necessary. Other conservation measures are listed on page 3, under Mitigation Measures, will ensure that impacts to any undetected spotted owl are avoided and minimized during construction.

CONCLUSION

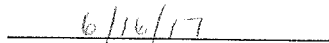
Based on the environmental impact analysis contained in the EA; the mitigation measures designed to avoid, reduce, or eliminate potential impacts; and the results of public review and agency coordination, NPS has determined that the selected alternative does not constitute a major federal action that will significantly affect the quality of the human environment. The selected alternative is not without precedent, nor is it similar to an action which normally requires an environmental impact statement. No connected actions with potential significant impacts were identified. Therefore, in accordance with NEPA and CEQ regulations, an environmental impact statement will not be prepared.

Recommended:



Vicki J. Snitzler, Superintendent


Oregon Caves National Monument and Preserve


6/16/17
Date

Approved:



Laura E. Joss, Regional Director
Pacific West Region, National Park Service


7/7/17
Date

- Appendix A Errata
- Appendix B Historic Structure Design Considerations
- Appendix C Programmatic Agreement

APPENDIX A

ERRATA

INTRODUCTION

This Errata comprised of two sections: edits to the environmental assessment, and a responses to substantive public comments. The Errata should be attached to the EA to complete the environmental impact analysis. The environmental assessment, Errata, and Finding of No Significant Impact (and its appendices) comprise the full and complete record of the environmental impact analysis.

The changes to the text of the EA that correct two inaccuracies in the environmental assessment (EA). These corrections do not change the project activities or increase the degree of impact described in the EA.

Edits to the Environmental Assessment

The Errata provides changes to the text made after public and agency review of the Correct Life Safety and Other Deficiencies in the Oregon Caves Chateau EA. The following text should be modified in the Environmental Assessment. Added text is underlined; deleted text is in ~~stikeout~~. The reason for the change is also noted.

EA, page 6, **WILDLIFE AND WILDLIFE HABITAT, INCLUDING SPECIAL-STATUS SPECIES**

A variety of wildlife habitats are present in the general vicinity of the park. Special-status species known to occur in and around the park include spotted owl (*Strix occidentalis caurina*), fisher (*Martes pennanti*), and Townsend's big-eared bat (*Corynorhinus townsendii*). However, only one species, the northern spotted owl, is known to exist in the vicinity of the Chateau, given the habitat requirements of the other species. Spotted owls were known to historically occur about one half mile from the Chateau. However, in 2011, the same year same year barred owls (*Strix varia*), were detected at the park for the first time, the NPS failed to detect spotted owls within two miles of the project area. Barred owls, a known competitor with spotted owls, make the presence of spotted owls unlikely. Studies³ show that the presence of barred owls is associated with displacement and decreased detectability of spotted owls. The invasion of the barred owl has been identified as a potential threat to the northern spotted owl by nearly all researchers who have documented the range expansion of the barred owl in the Pacific Northwest. Initial consultation with USFWS supported this assertion. Surveys in spring 2016 resulted in no audio or visual detections of spotted owls. In spring 2017, the park had one visual detection of a spotted owl. Surveys will continue to be conducted until construction, and results shared with USFWS. Additional mitigation will be included, if deemed necessary.

The proposed action would occur almost entirely within the Chateau; therefore, it is not expected that any rare, threatened, or endangered wildlife species or known habitat would be impacted. The Chateau is within a heavily public area, and has existing noise levels associated with visitor vehicles, buses, delivery trucks, etc. There is the possibility that ~~D~~ during the minimal exterior work, there could be short-term impacts on adjacent wildlife from construction noise and from additional pest management activities during the construction period. These impacts would be mitigated through informal consultation with the US Fish and Wildlife Service (USFWS). A discussion of informal consultation and proposed mitigation measures is

³ Barred Owls and Landscape Attributes Influence Territory Occupancy of Northern Spotted Owls; Sovern et.al; The Journal of Wildlife Management 78(8):1436–1443; 2014; DOI: 10.1002/jwmg.793

provided in chapter 5. Because the project is not expected to adversely affect wildlife or listed species, Therefore, this impact topic is dismissed from consideration.

Reason for change: Additional information supplemented the rationale for dismissal of impact topic.

EA, page 21 **ALTERNATIVE 2: PROPOSED ACTION – REHABILITATION OF THE CHATEAU (PREFERRED ALTERNATIVE)**

During construction, the park would provide restroom facilities and limited food service on the first floor of the nearby chalet or in the lower parking lot, if practicable.

Reason for change: There is potential that no individuals or businesses could bid on a contract for temporary food service, since there could be limited additional economic benefit related to any potential interim concessions operations. Should no one bid for the contract; it may not be feasible for limited concessions to be provided during the construction period.

Substantive Comments and NPS Responses

A total of 14 correspondences were received during the public comment period, which occurred from June 1, 2016, through June 2, 2016. The correspondences included correspondences from two businesses, three conservation groups, one county government, two non-governmental groups, one recreational group, one town government, and four unaffiliated individuals. From these correspondences, there were 10 non-substantive comments that expressed support for Alternative 2 (7) or Alternative 3 (1) or made general comments (2). There were 21 substantive comments that the NPS has summarized into the following 11 concern statements. Representative quotes from the associated comments letters are also provided, where applicable. Responses to these substantive concerns follow below.

Concern 1: Commenter's are concerned that other needed restoration work is not included in the scope of the project. Additional needed upgrades should be completed concurrently with the proposed improvements.

"Given the difficult construction timeframes and limited availability of funding, necessary work that is not included within this project will likely never happen... the planning, funding, and construction of all necessary upgrades at the Oregon Caves Chateau undertaken as a single phase, comprehensive project, which will minimize cost to the Federal government, the Friends, the concessionaire, and the entire regional economy. NPS should not close the Chateau to undertake half the job that is needed. (Non-Governmental Group, Correspondence #10)

"Re-opening after a two-year closure that did not result in visible visitor upgrades will create the appearance of waste and incompetence to the visiting public; and it will harm fundraising efforts for the preservation work... double-closure would also wreak havoc on tourism and public perception of the property." (Conservation/Preservation Group, Correspondence #8)

"At some future date, if an expanded Scope of Work was to be funded and undertaken, it would result in yet another lengthy shutdown of the Chateau with the attendant economic and operational disruption." (Non-Governmental Group, Correspondence #10)

"The badly needed full restoration of the Chateau should be completed in one phase. It would be difficult to see a "start and stop" process even be considered." Town/City Government, Correspondence #11)

Response: The improvements that are suggested in this concern are outside of the scope of the project and do not meet the purpose and need, which is to improve visitor and employee safety by implementing contemporary building improvements, fire protection, and accessibility standards in a way that minimally affects the distinguishing qualities and character-defining features of this NHL. The actions proposed are

needed to ensure code-compliant emergency egress and fire protection that would protect occupants and ensure the safety and longevity of the building.

The NPS contracted with two architectural firms to determine the extent of necessary repairs. Some of the needed work listed in the comment letters is actually included in the current scope of the project; particularly the items that make for logical sequencing. Insulation/sound protection between rooms would be completed, as would be installation of energy efficient fixtures and upgrades to heating systems. The exterior Port Oxford cedar siding is in overall good condition, with limited deterioration in some locations. An assessment of seismic capacity was completed and the foundation was found to be satisfactory. A needed lateral force resisting system is included in the project so that the Chateau would meet Seismic Evaluation and Retrofit of Existing Buildings (ASCE/SEI 41-13) and basic safety objective standards.

In addition, obtaining funding for a larger project with additional upgrades was infeasible. The NPS prioritizes funding for deferred maintenance and critical needs, not comprehensive capital improvements. The NPS prioritizes and selects project for funding by using a capital investment strategy, which is based on financial sustainability, visitor use, resource protection, and health and safety. Projects throughout the national park system (now consisting of 417 units) compete against each other for available funding; projects that address critical deferred maintenance score higher and are more likely to get funded. The scope of the Chateau rehabilitation reflects this process.

A "start-stop" is not proposed (hence the closure for up to two seasons). The two phases will be "back-to-back" so as to increase efficiencies (less mobilization and demobilization costs, etc.) and to keep the construction period as short as possible.

Further, the NPS disagrees that closure associated with the selected action would impact tourism and public perception. While guest amenities are important to Chateau visitors, reviews of the Chateau on travel websites are largely favorable. For example, of the 218 reviews on TripAdvisor, only seven were negative and cited cosmetic issues (which could be completely separate from this project) as the major complaints. A project that addresses critical life-safety needs support the visitor to a greater extent than the alternative of a permanent closure. If funding was not acquired to address critical life-safety issues, it is possible that the Chateau could face permanent closure.

Concern 2: The length of construction is a concern. Full closure should be limited to the shortest period of time possible. Commenters feel that a more comprehensive project should be completed concurrently with the selected action in either a one or two year time period.

"We are concerned that additional upgrades and restoration work beyond health and safety which have been proposed, but held back for a second phase of work, may result in a much longer closure of the Chateau than the expected 18 months/two summer seasons anticipated for the first phase of safety and accessibility measures... We urge the National Park service to seriously consider and do everything possible to undertake all of the work - safety, accessibility, historic upgrades and restoration within a single two-year time period to minimize the time during which the Chateau is closed." (Conservation/Preservation Group, Correspondence #14)

"...the stated approach to the work proposed creates the very real possibility of two discontinuous construction periods, increasing the impacts of the interruption to Chateau operations and leading to increased economic impacts to the concessionaire and staff, along with extended impact on the surrounding region through lack of service... The construction project will unavoidably impact bookings for the Chateau by interrupting service twice within a span of a few years... strongly encourage that NPS secure adequate funding to accomplish the entire Life Safety and Other Deficiencies project as proposed in a single, concentrated, construction phase so as to minimize disruption to the local economy and the operation of the Chateau to assure minimal economic impact. (Non-Governmental Group, Correspondence #10)

Response: The NPS agrees that construction in consecutive years provides greater efficiency and cost

savings, as well as decreased hardship for the concessionaire, staff, and the local economy. Hence, in 2015, additional federal funds were acquired so that the project could be completed in two consecutive phases. The prior funding allocation provided for two phases five years apart.

However, it is not feasible for construction of the selected action or the commenters' suggested expanded comprehensive project to be completed within one year or visitor season. This is due to the extent and sequencing of construction as well as the shortened winter weather related construction season. Shortening the construction time, length of closure, or having a partial closure would have safety impacts to construction crews, staff, and visitors resulting in inefficiencies, disruptions to the sequence of construction, and jeopardizing the success of the project. The majority of the work cannot be completed concurrently; for example, wiring needs installed in all of the walls prior to drywall installation. There is limited space in the Chateau for contractors to work. Stacking crews on top of one another would likely result in inefficiencies or unsafe working conditions. It is also possible that one or more of the life, safety, accessibility, historic preservation objectives would suffer due to trying to maximize too many different objectives or tactical goals.

Additionally, it is not possible to work in the off season or keep the Chateau open during construction given the size of the project, nature of the building, funding, schedule and requirements, and safety considerations. There is no efficient or safe way to isolate the needed repairs from visitors and staff. The Chateau has a small operation of 27 rooms, and has no separate wings that could be completed independently. Work on different floors would inevitably impact crews, staff or visitors on other floors. Specifying that work would only be done during the off-season could also place an undue burden on contractors and would likely dramatically reduce the number of competitive bids or perhaps eliminate them entirely, thus further delaying the project. The most efficient, economic, and safest way to complete the project is to close the Chateau during the two-phase construction period.

Concern 3: A three stop elevator shaft should be part of the project.

Response: Comment noted. The elevator will extend to the second basement.

Concern 4: The improvements to the staircase are unnecessary, potentially damaging to its character, and should be dropped from the project.

"While we appreciate the interest in code-compliance, the Friends suggest that NPS seek relief and an exception from current code as available to designated historic resources under Section 3409 of the Oregon Specialty Structural Code that appears entirely appropriate to this situation. We request that this modification to the main staircase be dropped from the project as unnecessary and visually damaging." (*Non-Governmental Group, Correspondence #10*)

Response: All uses of historic structures are subject to preservation and public safety requirements. No administrative or public use would be permitted that would threaten the stability or character of a structure or the safety of its users, or that would significantly compromise its integrity. The NPS began consultation with the SHPO from the early stages of project planning. SHPO has been involved with the project design to ensure that the work will neither diminish the overall character or quality of the structure nor diminish the enjoyment and appreciation of the structure. Because virtually no historic fabric will be removed from view, SHPO has conditionally approved this minor impact on historic fabric in exchange for mitigations listed in the table. Consequently the railing addition and other elements of the staircase meet the standard of no significant impact.

The addition of code compliant handrails to the staircase is required under ABAAS is needed to ensure compliance with the Americans with Disabilities Act (ADA) and the *Architectural Barriers Act* (ABA) and is a necessary component of the project. Unlike ADA, which is more receptive to equivalent approaches, upgraded handrails will help ambulatory users and those with ambulation challenges but choose to use a stair. Likewise, during an emergency the center stair must function as an exit access path, and visitors will

typically retrace their steps in order to escape. The open stairway will not have a rated enclosure, the riser/tread profile remains static, and landings will not be modified, so a handrail upgrade is a concession that aids routine access and emergency egress. In addition technical design requirements for handrails are harmonious for projects using either ABAAS or IBC (A117.1).

Adding glass enclosures to the open-riser staircase will return the stairs to a former appearance (apparently original risers were solid material). Removing the risers has opened the stairs visually, raising appreciation for the rustic quality of this focal feature. It has primary significance among interior features, displaying quality materials, log construction and unique details. The choice of clear glass risers will not block views or light penetration so transparency is retained. However, structural glass helps block passage of air and will slow the spread of smoke and fire between floors. This is a compensation for not separating (rated barrier) the stair from adjoining spaces. The existing stair represents a continuum of change and has gained historical value as a result. Modified risers will help baffle smoke migration and preserve the open appearance. Witnessing the extents of the original design is not appreciably changed by this change. And details can carefully anchor new risers to existing treads to limit the impact of this incursion. Alteration materials, finishes and anchorage details must be compatible so as not to call attention to this change – to comply with Standard #9. The modification can be accomplished as a fully reversible effect – to comply with Standard #10.

The short glass panel suspended from the ceiling and tracing the perimeter of the stair opening is a draft curtain. This is used when separation cannot be readily achieved at a vertical opening between floors. Like the new risers it helps retard the spread of smoke from the stairway to adjoining spaces. It will not prevent the spread of smoke or fire but it improves the opportunity (added time) for escape. This item can be added without loss of historic fabric and it will be clear in color to minimize visual intrusion. It is beyond the normal vision plane and it will not be a focal element. It fully meets Standards #9 (compatible change). This does not create a permanent change and removal of this accessory does not damage the historic ceiling bulkhead. *It fully meets Standard #10 (reversible change). It's a tertiary item that will not dominate nor degrade the more significant architectural features of the Lobby/Stair. The impacts are negligible.*

Enhanced accessibility is in keeping with Directors Order 42 with a goal of universal design for NPS design and construction projects. In addition, NPS has elevated occupant and staff safety to a primary level of importance and attention. To the extent that this project has enforced the IBC and IEBC building codes (2012 version), this project fully complies with IBC, Section 3409 (Historic Buildings). Essentially, this relates to changes to qualified historic properties, and states that, *"repair, alteration, addition, restoration, and movement of structures shall not be mandatory where such changes are judged by the building official to not constitute a distinct life safety hazard."* Under IEBC, Chapter 12 (Historic Buildings), Paragraphs 1203.3 (Means of Egress) was also applied, and again the authority having jurisdiction (AHJ) made exceptions for some existing conditions while upholding the need for modest modifications where they benefit safety without detracting from the historical integrity of the property. The EA finding (page 59) states that, as a result of egress improvement throughout the building, during a fire emergency occupants will be able to exit the building quickly and safely. The cumulative effect of construction changes are considered necessary for a satisfactory level of safety upgrading to ameliorate substantial fire hazards and occupant safety risks inherent to this structure. Life safety deficiencies are traceable to numerous conditions, such as; location, occupancy classification, type of construction, transient use, and the historic qualities of significant architectural elements and features. This design reflects code compromises but remains steadfast where minimal change can be incorporated without destroying the historic fabric of the resource.

Concern 5: Major improvements to the Little D space are needed.

Response: This is not a critical life-safety or accessibility need, is outside of the scope of the project and budget, and would not be prioritized by the NPS capital investment strategy (noted in Concern 1). The suggested improvements to the Little D space are not a historic use of the Chateau. Year round services at the Chateau are not feasible for the NPS at this time. Changes proposed by the commenter would require

additional planning and compliance efforts. However, the selected action would make that second basement level accessible for employees and visitors. Also, modification of an existing staff restroom to ADA standard is included in the project scope.

Concern 6: The Friends of Oregon Caves Chateau state they would fundraise for an expanded restoration project. Commenters are also concerned that full closure for two seasons would impact the Friends' ability to fundraise.

"NPS [should] schedule the work to coincide with other urgently needed preservation and restoration for which the Friends of Oregon Caves & Chateau is currently fundraising." (Conservation/Preservation Group, Correspondence #18)

"The original purpose of the Friends was to raise funding and provide assistance to NPS... "Further we believe that our own ability to continue to successfully solicit private funding to assist the National Park Service and the Oregon Caves Monument and Preserve for future work at the Chateau will be negatively impacted by a major rehabilitation project that closes the Chateau for a minimum of 18-24 months and possibly longer, with additional phases, and does not result in fully addressing all aspects of the project." (Non-Governmental Group, Correspondence #10)

Response: The NPS appreciates the commitment by the Friends of Oregon Caves Chateau (Friends) to fundraise for other Chateau improvements. However, the Friends are not currently fundraising for any urgently needed Chateau preservation projects. According to NPS Director's Order 21 (DO-21), before an entity can begin fundraising for a park, a fundraising agreement must be approved. These fundraising agreements which meet the threshold for Director's approval must be submitted with a donor recognition plan, a feasibility study, a fundraising plan, and a written description of the partner's donation review process. None have been initiated for additional restoration of the Chateau.

DO-21 also discusses Friends Group Agreements which establish long-term relationships between NPS and its partners. There is an existing Friends Group Agreement between the park and Friends of the Oregon Caves Chateau; a fundraising agreement may tier off the Friends Group Agreement if/when the Friends initiate fundraising for other improvements.

It may be possible that some funders may be discouraged by the NPS' inability to fund all improvements at once; however, this is a common scenario across the national park system and one that often drives partners' fundraising for parks. An argument could be made that fundraising for more cosmetic upgrades would become easier once the structure is brought up to modern day health and safety codes.

If the Friends were able to fundraise for a larger restoration, another full closure of the Chateau may not be necessary. Upgrades beyond the scope of the project may not require another closure of the Chateau.

Concern 7: The issue of environmental justice needs to be addressed; adverse short-term impacts on the local economy would be significant, whether or not the current concession contract expires.

Response: As stated on page 7 of the EA, Presidential Executive Order 12898, *General Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, requires all federal agencies to incorporate environmental justice into their missions by identifying and addressing the disproportionately high and/or adverse human health or environmental effects of their programs and policies on minorities and low-income populations and communities.

There would not be any significant disparities in the distribution of benefits or burdens of the proposed action between these populations. Low-income and minority residents are at least as well served by the existing and proposed project as are other segments of the population. In addition, there would be no displacement of these populations resulting from the construction of the project during the future years with no significant disparities in the health or environmental effects on these populations. The impacts resulting from temporary closure of the Chateau for construction are addressed under Socioeconomics.

Concern 8: Additional mitigation is needed for the Chateau closure and associated loss of jobs.

"Mitigation strategies are needed for the short-term adverse impacts on the low-income population of the area of influence during implementation of the preferred Alternative 2." (Non-Governmental Group, Correspondence #5)

The loss of 48 jobs for 2 seasons needs mitigation. "It is false to assume that displaced concession employees would find equivalent work elsewhere in the area of influence. If they did they would displace other workers. All current concession employees are residents of the Illinois River Valley. There are no comparable employment opportunities within a 20 mile radius in the immediate area of influence. (Non-Governmental Group, Correspondence #5)

Response: The NPS is unable to provide alternate employment for Chateau employees during the construction-related closure of up to 18 months. However, some local jobs will be created as part of the construction project. And although not mitigation per se, the NPS will investigate the feasibility of allowing a vendor to operate a temporary food and beverage operation in the Chalet or parking lot. This potential operation is not guaranteed and is dependent on interest and economic viability. Construction will be scheduled so that work is performed in the off-season to the greatest extent possible or performed in a way that minimizes negative impacts on the concessioner and park visitors. The exact phasing would be based on available budget approval and award of construction options. No additional mitigation is required.

Concern 9: The socioeconomic analysis is inadequate. Complete closure of the Chateau for the work would create extreme economic hardship for concessionaire employees and local communities. A cost benefit analysis needs to be completed to justify a 9 month versus 18 month construction period.

"We believe the proposed multiple construction phase approach has serious economic and social implications to the successful operation of the Chateau and will adversely and unnecessarily impact the southern Oregon regional economy and the Chateau's success." (Non-Governmental Group, Correspondence #10)

"The subsequent local spending associated with construction workers would not offset the loss of local income of 48 low income employed concessioners and a reduction in the number of visitors to the National Monument. Further economic impacts would occur as a result of the secession in purchases of local supplies for visitor services. In the long term, the renovation of the Chateau would increase visitor use of the facility and the visitors satisfaction with their experience at the park...Complete cost benefits and adverse impacts on low-income population in the immediate area of influence need to be compared and analyzed for a 9 month vs 18 month implementation plan." The local economy will be impacted by a change in visitor spending with a 2 season Chateau closure during construction. Visitors will be deterred from visiting the park during the renovation. There will be a loss of visitor spending and an adverse short-term impact on the local economy.. (Non-Governmental Group, #5)

"We are concerned that additional upgrades and restoration work beyond health and safety which have been proposed' and create extreme economic hardship that could be much more difficult to recover from." (Conservation/Preservation Group, #14)

Response: The EA acknowledges that the Alternative 2 would be completed in two phases that could (but may not) last up to a maximum of 18 months; therefore, the entire rehabilitation was analyzed as one action. The socioeconomic impact analysis on pages 52-55 of the EA contained adequate detail for the NPS to determine that an environmental impact statement (EIS) would not be needed for the action (DOI NEPA regulations 46.310 (e), 40 CFR 1508.9 (a)(1)).

The EA discloses that the project would temporarily influence employment and income in the community during construction, but this would not constitute a permanent change in the employment and income of the community. The disruption of employment under Alternative 2 during the construction period does not constitute a significant impact.

The EA states that construction jobs would be created by the proposed project. There is potential for a certain amount of workers that would likely be hired locally during the construction phase of the Project. In addition, the analysis in the EA assumes there would be limited additional economic benefit related to any potential interim concessions operations whether or not the Chateau were open during the construction period.

The local economy would be affected by the reduction of local purchases by visitors at the Chateau or by the concessionaire to operate the Chateau. However due to the relatively short duration of construction; the creation of construction jobs and associated local spending would offset the loss of seasonal visitor spending at the Chateau. The caves and other portions of the monument would remain open and would continue to sustain the local economy through tourism. If visitors cannot purchase food or lodging at the Chateau, they will most likely still stay overnight and purchase supplies elsewhere in Josephine County. On the other hand, if the necessary life-safety improvements are not completed, the Chateau could be closed permanently, which would result in a permanent loss of jobs and revenue.

A cost benefit analysis comparing a 9 month versus 18 month construction period is not necessary because a 9 month construction is infeasible (see Concern 2). Full closure is inevitable with this type of work and in a small structure such as the Chateau. Constricting a major rehabilitation to one short season, with numerous subcontractors would result in inefficiencies, safety impacts to construction crews, and could jeopardize the success of the project. Subcontractors would get in each other's way or create unsafe working conditions. Proper sequencing of the work would be compromised. Less attention would be paid to mitigation and other types of supervision by NPS because too many work operations would then be going on at once. If the expansion of construction projects was to become a major objective, one or more of the life, safety, accessibility, historic preservation objectives would suffer due to trying to maximize too many different objectives or tactical goals. A predetermined short construction period would also place an undue burden and added costs on contractors in a number of ways. It would likely dramatically reduce the number of competitive bids or perhaps *eliminate them entirely, thus further delaying the project. Since the number of* qualified subcontractors is very limited within a 20 mile radius, compressing construction would hurt the local economy because contractors would be forced to hire outside the radius at an added expense that may exceed the funding available.

Concern 10: The NPS should refer to the Friends' recent rehabilitation projects as an example of historic preservation.

Response: Comment noted. These design considerations were discussed in initial conversations with the SHPO and are reflected in Appendix B.

Concern 11: The Friends of Oregon Cave wish to be involved in the planning and design of other needed restoration work.

Response: Thank you for your interest and willingness to further assist with the project. The NPS invited input from the Friends of Oregon Cave on the project at various stages of project planning. During the planning process, the NPS considers input from partners, agencies, and other members of the public.

APPENDIX B

Historic Structure Design Considerations

The list of design considerations was developed in consultation with the Oregon SHPO. These design elements will be further developed and/or refined during the future review of design development documents, which will enable reviewers to evaluate how project design and specifications may affect character defining features of the Chateau, historic district and associated cultural landscape and then collaboratively assess and resolve potential adverse effects through the design development.

Location	Change	Effect	Design Elements
Most public walls and ceilings	Replacement of thick pressed fiberboard Nu-wood with sheetrock of similar thickness.	Substantial removal of Nu-Wood historic fabric as well as Nu-wood with non-historic varnish finish.	Cover sheetrock with thin homasote fiberboard perhaps thinly painted with intumescent paint that, with the aid of photo documentation, will mimic matte texture, color, and cut patterns (beveled edges of tongue and groove panels) of the original Nu-wood.
Street level lobby	Elevator placement moves front desk closer to main entrance and reduces perception of openness on right while facing stairwell.	Substantial horizontal reduction in feeling of openness viewed from front door and center of lobby and also reduction in both vertical and horizontal openness on right while facing stairwell.	Remove all non-historic furniture, statues, radio consoles, etc. and replace with small Monterey pieces in front of fireplace, move larger historic furniture to back of fireplace out of sight of first view. Put chairs only at sides of tables whose short sides face front of lobby. Elevator placement avoids potential adverse impacts on central stairwell and coffee shop.
Chateau backside	Rehabilitation of balconies.	Substantial addition of non-historic fabric.	A wooden façade will cover steel frame from where Chateau is first viewed but later side views of the steel frame will differentiate balcony infrastructure from the original historic fabric removed in 1950s. Cutting of trees in back of Chateau will help restore mid-distance historic views.
Front of Chateau	ADA ramp.	Non-historic structure in adjacent HD and in front of NHL.	Use historic district (HD)-type wooden posts, railings, and rockwork walls to differentiate ramp structure from Chateau and blend in with the HD. Low shrubs planted in front of rock wall will blend in with Chateau shrubs in front of building.

Outside northeast corner of Chateau	New fire escape will have ADA ramp.	Non-historic structure in adjacent Historic District.	Ramp will be as close to the Chateau as possible and face away from first view of Chateau. Wooden façade will mimic historic fire escape now removed. Cutting of trees will help restore initial full backside view, thus reducing latter visual impact of seeing ramp close up.
Outside southwest corner of Chateau	New fire escape will have ADA ramp.	Non-historic structure in adjacent Historic District.	Keeping new escape as steep as present-day fire escape will be less code compliant but will barely protrude into HD at edge of road asphalt. Wood façade will resemble original fire escapes during first view but will be differentiated from historic fabric when side viewed.
Right backside of Chateau upon first view	Exhaust ventilation shaft extends to roof.	Shaft covers of historic fabric when Chateau is first viewed.	Produce non-flammable cedar façade resembling texture based on photographic images.
Outside northwest corner of Chateau	New fire escape from second and third basements would come up to street level.	Would substantially cover historic fabric during first view of Chateau as it will be in front & the closest <i>object</i> .	Have fire escape exit to Cave Creek trail below Chateau.
Lobby stairwell	Addition of ADA handrails and glass stair enclosures.	Would add non-historic fabric and reduce openness.	ADA step backings would be scratch resistant and ceiling smoke barrier would be transparent glass. If confirmed by historic photos, put in non-translucent risers for stairwell.
Second floor	Addition of second staircase to third floor.	Removal of guest room bathroom and storage closet and addition of non-historic fabric.	Two exterior non-historic fire escapes (3 rd to 2 nd floor units) are removed and two rooms are restored to historic function.
North end of public lobby	Addition of ramp to access ADA lodging.	Removal of historic floor to achieve ADA gradient, reduces lobby openness, bulkhead intrusion into ceiling of lower floor.	Put ramp sideways so as to minimize intrusion into lobby. View of ceiling disruption is not the main view.
Building exterior	Cedar bark siding will be lost during internal to external construction due to fragility and previous splintering by nails.	Some loss of cedar bark sections, arguably the most important historic fabric of building.	Photogrammetry as a photographic part Historic America Building Survey (HABS) not done previously to best record texture so as to maximize in-kind repair.
Coffee shop	Two bar stool type seats and adjacent counter space replaced with ADA seating.	Alteration of historic fabric and replacement with non-historic fabric.	Position ADA seating so as to be less visually intrusive during first view of room. Enclose end of the counter so that view into

			coffee shop is similar to existing view. Shift accessible seating one seat over to preserve current view from dining room.
Lowermost public lodging level	Conversion of all five guest rooms to ADA codes.	Alteration of historic fabric.	Where ADA possible, salvage and reinstall historic elements. New doors will match existing doors except will be slightly wider. Restore historic views by cutting trees so as to mitigate impact on mobility impaired visitors being barred from lodging in upper levels and seeing further.
Front desk in lobby	ADA alteration to registration desk.	Alteration of historic fabric by lowering desk.	Few changes would be seen from front door and so would not be visually intrusive.
Gift shop: first basement	New bathrooms.	Would remove or displace non-historic bar/lounge and reduce original dancefloor space.	Where ADA possible, salvage and reinstall historic elements from removed bathrooms and match doors to ADA doors in lodging.
All floors	New fire doors.	Would cover historic fabric and reduce <i>openness</i> .	Camouflage full-height doors to match adjacent wall surface.
1st to 2nd basement stairwell	Addition of railings and decrease in stairs steepness.	Some removal of historic fabric and addition of non-historic fabric.	Removal of non-historic 1 st basement stairwell enclosure.
Male bathroom in first basement	Removal to make way for elevator.	Removal of historic fabric.	Where ADA possible, retain historic fixtures, etc. for new bathrooms.
Female bathroom on first floor	Removal to make way for ADA lodging bathrooms.	Removal of historic fabric.	Where ADA possible, retain historic fixtures, etc. for new bathrooms.
All floors	Replacement and/or upgrade of electrical, fire alarm, plumbing, and sprinkler systems. Sprinklers extended throughout the building.	Limited replacement of historic fabric of low significance.	Will reduce possibility of future damage to historic fabric; Some existing sprinkler lines will be relocated to minimize impact on historic structure.
1st basement	Conversion of window into fire egress door.	Limited replacement of historic fabric.	Proposed design has least impact vs. alternatives.
Attic, laundry, refrigeration equipment and waste/linen storage areas	Adding of 1-hour separation walls.	Reduced openness and limited covering of historic fabric.	Will reduce possibility of future damage to historic fabric. Walls to be painted color of adjacent walls.

Occupied areas	Fire warning and egress systems.	Limited covering of historic fabric; no exit signage is historic.	No mitigation available.
1st basement	Doors for exit and in each staff bedroom, ramps.	Limited covering of historic fabric.	Would look like existing doors except for fire code compliance.
3rd basement	Replacement of stairs.	Removal of stairs damaged beyond repair.	Replacement in kind.
General, no specific site	All of the above and other impacts.	Cumulative impacts not adequately covered by above.	<p>Rehabilitation of other HD buildings and HD trail maintenance and rehabilitation.</p> <p>Stabilization of Guide Shack (FY19 proposal) and rock walls (FY17).</p> <p>Historic America Building Survey (HABS) photography prior to start of late FY18 project in order to guide mitigation efforts especially of interior wall and ceilings covering and barked exterior to use in construction mitigation.</p> <p><i>Organization of archives</i> (FY19 proposal) including HABS photographic survey.</p> <p>Collection and retrieval of historic data useful in mitigation (ongoing).</p>

**PROGRAMMATIC AGREEMENT
BETWEEN
THE NATIONAL PARK SERVICE (UNITED STATES DEPARTMENT OF THE
INTERIOR) AND THE OREGON STATE HISTORIC PRESERVATION OFFICER
REGARDING
REHABILITATION OF THE OREGON CAVES CHATEAU
TO CORRECT LIFE SAFETY AND OTHER DEFICIENCIES**

WHEREAS, the National Park Service, Oregon Caves National Monument and Preserve (NPS) proposes to rehabilitate the Oregon Caves Chateau (Chateau) to correct life safety and other deficiencies as described in the Appendix I (the Undertaking) and in doing so must meet the requirements of Sections 106 and 110(f) of the National Historic Preservation Act (54 U.S.C. 306108 and 54 U.S.C. 306107, respectively); and

WHEREAS, the NPS consulted with the Oregon State Historic Preservation Officer (SHPO) pursuant to the November 14, 2008 *Programmatic Agreement among the National Park Service (U.S. Department of the Interior), the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers* and 36 CFR Part 800; and

WHEREAS, the NPS in consultation with the SHPO has identified the area of potential effect (see Appendix II) and the historic properties within the area of potential effect that have the potential to be affected by the Undertaking; and

WHEREAS, the area of potential effect includes the Chateau, a National Historic Landmark and the Oregon Caves Historic District which is listed on the National Register of Historic Places; and

WHEREAS, NPS believes implementation of the Undertaking can result in an adverse effect to the Chateau, and the NPS in past consultation with the SHPO has determined that the extent of the effects on historic properties cannot be fully evaluated prior to a review of the final schematic, design, and construction documents. This review will include 100% construction drawings and the cumulative impact of mutually agreed upon mitigations in the Chateau and other parts of the National Historic District. To address these issues, the NPS has developed this Programmatic Agreement (PA) establishing a process to assess and resolve potential adverse effects in accordance with 36 CFR Part 800.14(b)(1)(ii); and

WHEREAS, the NPS has consulted with the Friends of the Oregon Caves Chateau and the Illinois Valley Community Development Organization regarding the potential effects of the undertaking on historic properties and has invited each to sign this PA as a concurring party; and

WHEREAS, the NPS has notified the office of the Secretary of the Interior of the potential adverse effect pursuant to 36 CFR 800.6(c); and

WHEREAS, in accordance with 36 CFR § 800.6(a)(1), the NPS notified the Advisory Council on Historic Preservation (ACHP) of the potential adverse effect determination with specified documentation and the development of the PA, and by letter dated January 12, 2017 the ACHP declined to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and

WHEREAS, the NPS has involved the public through the National Environmental Policy Act process and associated Environmental Assessment;

NOW, THEREFORE, the NPS and SHPO agree that the Undertaking shall be implemented in accordance with the following stipulations in order to take into account the effects of the Undertaking on historic properties, and further agree that these stipulations shall govern the Undertaking and all of its parts until this PA expires or is terminated.

STIPULATIONS

I. PROFESSIONAL QUALIFICATIONS AND STANDARDS

(1) The NPS will ensure that all work performed on the Chateau that has the potential to have an effect, directly or indirectly, on its contributing characteristics or features be performed or supervised by qualified

individuals and/or teams that meet the *Secretary of the Interior's Historic Preservation Professional Qualification Standards*, 62 Fed. Reg. 33, 707 (June 20, 1997), for history, architectural history, architecture, historic architecture and conservation, landscape architecture and/or archeology, as appropriate. Nothing in this stipulation may be interpreted to preclude NPS or any agent or contractor thereof from using the properly supervised services of persons who do not meet the professional qualification standards.

(2) Any inventory or documentation of historic properties pursuant to implementation of the PA shall conform to the provisions of the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation (48 FR. 44716-44740) and any applicable standards and guidelines for historic preservation established by the SHPO.

(3) Curation of materials and records resulting from actions stipulated by this PA shall be curated in accordance with 36 CFR Part 79

II. COLLABORATIVE DESIGN DEVELOPMENT

(1) The NPS will ensure that all design contractors working on the Undertaking are provided design standards, to include at a minimum, the following:

1. The Secretary of the Interior's *Standards for the Treatment of Historic Properties*.
2. The NPS Denver Service Center Design Workflows guidelines for schematic, design, and construction documents <http://www.nps.gov/dscw/designbidbuild.htm>.
3. Other design standards recommended by the SHPO as deemed appropriate by the NPS.

The NPS will ensure that the design contractors adhere to these standards in the development of all design and construction documents including change orders necessitated after award of any construction contracts implementing the Undertaking or part thereof.

(2) The NPS and SHPO will establish a collaborative design review team, to ensure that the SHPO has opportunity to assist the NPS in meeting its design goal that the Undertaking preserve the integrity and rustic architecture character of the Chateau to the greatest extent possible.

1. *Team Membership.* Membership on the team will consist of representatives of the NPS (Oregon Caves National Monument and Preserve, Pacific West Region, Denver Service Center) and the SHPO. NPS membership will include staff meeting Secretary of Interior (SOI) professional qualification standards for historic architecture and historic landscape architecture. Additional members may be added to this team at the discretion of the NPS and SHPO.
2. *Team Mission.* The primary purpose of the team will be to review draft schematic and design development documents and evaluate how project design and specifications may affect qualifying characteristics of the Chateau, and to make recommendations on how the design might be improved and/or adverse effects avoided. At a minimum the NPS will submit draft schematic and design development and 30% and 70% construction documents to the SHPO for review and comment.
The SHPO shall have 30 calendar days from the date of receipt to provide comments to the NPS. If the SHPO fails to respond within this time period, NPS shall assume the SHPO has no comments and will proceed to the next step in the design process.
3. *Team Support.* The NPS will facilitate the function of this team by providing for meetings during the design process, ensuring that team members are provided all appropriate design and construction documents in a timely fashion, and documenting the outcome of team meetings.
4. *Team Outcome and Dispute Resolution.* The members of the team will strive diligently to work toward mutually agreeable outcomes on design issues addressed by the team. If, during the course of team review of a design proposal an impasse is reached, members of the team can take steps to have the dispute resolved through the provisions set forth in stipulation V of this PA.
5. *Team Duration.* The team will remain in place until the close of the design process, to include development of pertinent design construction documents and specifications, for all components of the Undertaking and significant design changes which may be required during construction.

III. ACTIONS TO RESOLVE ADVERSE EFFECTS

(1) NPS may complete Historic American Buildings Survey (HABS) photographic documentation of The Chateau. HABS level documentation for areas to be directly affected by the Undertaking will be completed prior to implementing actions in those respective areas. The Park shall consult with the SHPO and the HABS/HAER/HALS coordinator for the NPS Pacific West Region to determine the type and level of documentation.

(2) NPS plans to recreate the balconies that originally were on the south side of the Chateau as a major contribution to mitigation for the potential adverse effects. It's possible that the timing of the balcony project would not coincide with the Chateau rehabilitation because of different funding sources.

(3) If the balcony project is significantly delayed, or if other aspects of final design require additional mitigation, NPS and SHPO will collaborate on development of additional mitigations. These mitigations may include:

- Rehabilitation work at other contributing buildings in the Historic District.
- Trail maintenance on the Historic trails.
- Stabilization of Historic Guide Shack
- Organization of archives for the Chateau and the Historic District.
- Collection of historic information, including photos of the Chateau and Historic District
- Interpretive displays depicting spaces and materials changed during the rehabilitation.

IV. POST-REVIEW MODIFICATIONS

In the event that minor (having little potential to effect character defining features or elements of the Chateau) modifications in design or materials are required during construction, such modifications will be allowed under this PA provided that the changes are consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (36 CFR Part 68) and are reviewed by appropriate subject matter experts and approved by the NPS. The NPS will document such minor modifications in an internal memorandum to the files that will be available at Oregon Caves National Monument and Preserve for inspection by the SHPO. Following construction, the NPS shall provide a summary memorandum listing the modifications to the SHPO.

V. MONITORING OF CONSTRUCTION ACTIVITIES

The SHPO may monitor construction activities pursuant to this agreement. Specifics regarding monitoring would be determined in consultation with the NPS, and the NPS shall cooperate with the SHPO in carrying out any monitoring and review responsibilities. NPS subject matter experts will be available to monitor construction activities and review changes as needed.

VI. DISPUTE RESOLUTION

(1) The signatories agree that this PA shall guide the implementation of the Undertaking for addressing its effects to and treatment of the Chateau until the Undertaking is complete and the stipulations of this PA fulfilled, this PA expires, or this PA is terminated. Should the signatories of this PA at any time object in writing to the manner in which the terms of this PA are implemented, to any action carried out or proposed with respect to implementation of this PA, or to any document prepared in accordance with and subject to the terms of this PA, the objecting party shall notify in writing the other signatory of this PA. The NPS shall notify the ACHP of the subject of the objection, and the signatories shall consult as soon as practicable with the ACHP, if it shall choose to participate in the consultation, to promptly resolve the objection.

(2) If the objection is resolved through consultation, the NPS shall notify the ACHP of the terms of the resolution, and the NPS may proceed with the disputed action in accordance with the terms of such resolution.

(3) If the NPS determines that the objection cannot be resolved through consultation, or if the duration of the consultation has exceeded fifteen (15) days from the commencement of consultation to resolve the dispute, the NPS shall forward all documentation relevant to the objection to the ACHP, including the

NPS's proposed resolution of the objection, with the expectation that the ACHP shall within thirty (30) days after receipt of such documentation:

1. Advise the NPS that the ACHP concurs in the NPS's proposed resolution of the objection, whereupon the NPS shall notify the other signatory, and NPS shall resolve the objection accordingly; or
2. Provide the NPS with recommendations, which the NPS shall take into account in reaching a final decision to resolve the objection. The NPS shall notify the other signatory and the ACHP of its final decision.

(4) The procedures outlined in Stipulations VI.1 to VI.3, above, shall apply only to the subject of the objection. The NPS's responsibility to carry out all actions under this PA that are not the subjects of the objection, and which do not foreclose the consideration of alternatives to resolve the objection, shall remain unchanged.

(5) At any time during implementation of the terms of this PA, should a member of the public object to the manner of such implementation, the NPS shall consult with the objecting party and inform the SHPO and the ACHP in writing of the objection, the results of the consultation, and the NPS's proposed resolution of the objection. The NPS shall implement its decision should the SHPO and ACHP fail to comment within fifteen (15) days of receipt of the NPS decision, or NPS shall consult further with the SHPO and ACHP, and the objecting party to resolve the objection.

VII. AMENDMENTS

Any signatory to this PA may propose that the PA be amended, whereupon the signatories shall consult to consider such amendment. This PA may be amended only upon the written agreement of all signatories. The amendment shall be effective on the date a copy signed by all of the signatories is filed with the ACHP by the NPS.

VIII. TERMINATION

(1) If any signatory proposes termination of this PA, the party proposing termination shall in writing notify the other signatory to this PA and the ACHP, explain the reasons for proposing termination, and consult with the other signatory to this PA and the ACHP, if it chooses to participate, to seek alternatives to termination.

(2) Should such consultation fail, the signatory proposing termination may terminate this PA by promptly notifying in writing the other signatory to this PA and the ACHP. Termination shall render this PA without further force or effect.

(3) Should this PA be terminated, the NPS shall consult in accordance with 36 CFR 800.6(b).

IX. DURATION OF PA

Unless terminated pursuant to stipulation VIII, the duration of this PA is seven (7) years from the date of its execution. If necessary, NPS shall initiate consultation with the other signatory to this PA approximately one (1) year prior to the expiration date of this PA to reconsider its terms. Reconsideration may include the continuation or revision of this PA by amendment or termination.

X. EFFECTIVE DATE OF PA

This PA shall take effect on the date the final signature is affixed to this PA.

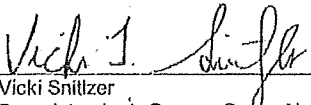
X. ANTI-DEFICIENCY ACT

Any requirement for the payment or obligation of funds by the Government established by the terms of this PA shall be subject to availability of appropriated funds. No provision in this PA shall be interpreted to require obligation or payment of funds in violation of the Anti-Deficiency Act, 31 USC Section 1341. If the availability of funds and compliance with the Anti-Deficiency Act impair the NPS' ability to perform under this PA, then the NPS shall consult in accordance with Stipulation VI of this PA.

EXECUTION of this PA and its subsequent filing with the ACHP and implementation of its terms constitute evidence that the NPS has afforded the ACHP and the SHPO timely opportunities to comment on the Undertaking and its effect on historic properties.


SIGNATORIES

National Park Service


Vicki Snitzler
Superintendent, Oregon Caves National Monument

Date: 5/11/17

Oregon State Historic Preservation Office


for Lisa Sumption
Oregon State Historic Preservation Officer,
Oregon State Historic Preservation Office

Date: 4.25.17

Appendix I

The Undertaking

Correct Life and Fire Safety Deficiencies

To correct life and fire safety deficiencies such as flammable materials, as in existing fiberboard finishes; those finishes would be removed from all floors of the building and replaced with a fire-resistant wall product similar in appearance to the existing finishes in the first basement and public areas of the first floor. A one-hour fire wall would also be installed in the attic and laundry, refrigeration equipment, and waste/linen storage areas. Ignition hazards would be reduced by improving the exhaust and ventilation systems in the kitchen and staff dining room and by upgrading the building's electrical system. Wiring would be replaced throughout, additional outlets would be installed, and light fixtures would be rehabilitated. Multiple service panels would be consolidated into a single panel. A code-compliant fire alarm, notification and suppression system would be installed. The system would include electrical upgrades to the overall fire system, an automatic dialer to the fire department, notification speakers and horn/strobe devices in occupied areas, manual pull stations at exit doors, and smoke sensors in heated portions of the building. Sprinkler system upgrades would include installation of updated sprinkler heads and valves along with a fire department connection to the sprinkler system.

Emergency fire egress would be improved through the installation of exit signs, emergency lighting, and new fire doors with magnetic holds wired to the alarm system that allows visitors and employees to more easily exit the building during an emergency. Glass draft curtains and additional sprinkler heads would provide added protection to stairwell areas. New emergency exit doors would be installed in the first basement and in each staff bedroom, and upgrades would be made to existing egress doors in the first, second, and third basements. Exterior landings, rails, staircases, and other external egress improvements would be installed as applicable, and fire escapes would be replaced with ones which design is more compatible with both the building's historic appearance and the historic character of the landscape. Interior staircases would also receive safety upgrades, including handrails and glass stair enclosures, and a new staircase between the top two floors would be added.

Construction and Utility Improvements

Upgrades to the building would include overall construction and utility improvements. Bolted rods would be used to tie beams and columns together to provide added structural support. During removal and replacement of wall and ceiling finishes, shear walls and insulation would be installed, and the plumbing, sprinkler and heating systems would be upgraded. The three-level balcony structure on the building's west elevation could be reconstructed to be compatible with the building's original historic structure and reinforced with a new steel superstructure located behind and under the wood framing. The installation of the balconies is included as part of the overall proposed action to improve the Chateau.

Correct Visitor and Staff Accessibility Deficiencies

Visitor and employee accessibility improvements would be made to comply to the fullest possible extent with the Architectural Barriers Act, (ABA), (42 USC 4151 et seq.). Paths, ramps, railings, and entry landings would provide ease of entry to the interior of the building and would enable visitors with disabilities to enter the lobby area of the Chateau from the parking lot. Doors and door hardware would be retrofitted as necessary.

A full-size elevator shaft and elevator would be installed between the first floor to the first basement (dining room and gift shop) level. The elevator would extend to the second basement, providing access to these areas for individuals with disabilities.

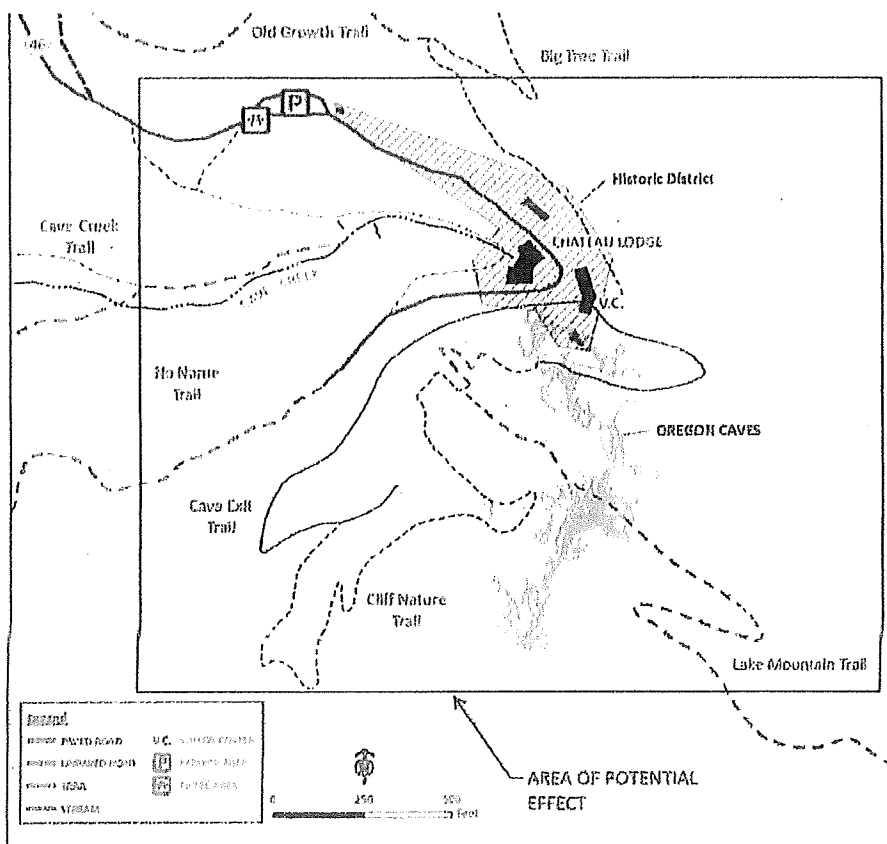
Accessibility improvements would be made in the first basement, allowing individuals with disabilities access to the restaurant and gift shop areas. Accessible public restrooms would be provided on the first basement (dining room) level and on the second basement level for staff use. Accessibility improvements would also be made to the lobby's registration desk allowing improvements to the registration process for individuals with disabilities. Accessibility improvements would also be made in the coffee shop, including removal of seats in the coffee shop to provide for accessible seating at the counter. Similar to the public

areas of the building, accessibility developments would be made to the employee areas of the building, including providing accessible ramps where applicable in the second basement employee areas, providing separate accessible restrooms for both genders, and upgrading doors and hardware as necessary.

Repairs to Second and Third Floors

Repairs to the second and third floors would be executed so the Chateau could continue serving overnight guests while removing and replacing wall finishes, door and window frames, including enhancing hardware, as applicable. Additional accessibility improvements would include the conversion of all five first floor guest rooms to accessible rooms and the addition of a ramp from the first floor lobby to the first floor guest rooms. Two new guest rooms could be available for overnight use, increasing the Chateau capacity from 24 to 26 guest rooms.

APPENDIX II Area of Potential Effects



The area of potential effects (APE) includes the Oregon Caves Historic District, which is listed on the National Register of Historic Places and includes the Chateau, and the five trails that were added to the historic district through the district's 2012 boundary increase: Big Tree Trail, Cave Exit Trail, Cliff Nature Trail, Lake Mountain Trail, and the No Name Trail. All staging and stockpiling would occur on the park's existing paved roads and parking areas.