

*National Park Service*  
U.S. Department of the Interior

**Katmai National Park and Preserve**  
**Alaska**



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## **Finding of No Significant Impact**

Rehabilitation and Replacement of Brooks Camp Facilities

August, 2006

Recommended: Signed by Ralph Moore on August 14, 2006. Signature on file.  
Superintendent Date  
Katmai National Park and Preserve

Approved: Signed by Marcia Blaszak on August 15, 2006. Signature on file.  
Regional Director, Alaska Date

## **FINDING OF NO SIGNIFICANT IMPACT**

### **Rehabilitation and Replacement of Brooks Camp Facilities**

#### **Katmai National Park and Preserve, Alaska August, 2006**

The National Park Service (NPS) has prepared an environmental assessment (EA) to evaluate alternatives for facility upgrades at the Brooks Camp Developed Area of Katmai National Park and Preserve (KATM). The overall purpose of this project is to provide minimally necessary, maintenance corrective actions to address critical life, health and safety issues to keep the Brooks Camp operation functioning at an adequate level over the next several years. Specifically, the purpose of each respective project component is to (1) rehabilitate employee housing to provide adequate health, safety and utility services, (2) remove substandard housing from the park housing inventory and replace it with energy efficient, standard quality housing that satisfies regulatory health and safety requirements, (3) provide an adequate, sanitary and safe public campground, (4) correct deficiencies in the current electrical generation and distribution system, (5) provide a sanitary human waste disposal system at the Lake Brooks visitor entrance and (6) provide a reliable leach field operation in compliance with State wastewater and public health regulations.

A significant deferred maintenance backlog has developed during the last twenty years, resulting in deteriorating facilities at Brooks Camp that are now in need of major upgrades or replacement. In summary, a lack of adequate support facilities, identified in the 1996 Development Concept Plan/Environmental Impact Statement (DCP/EIS), increasingly contributes to employee health, safety and welfare deficiencies. The existing electrical system is undersized and overloaded to the point of being documented as unsafe by the NPS Regional Safety Officer. Other utility systems have experienced failures and may need replacement or extensive repairs in the near future. Employee housing, the public campground and sanitation facilities are not only inadequate and substandard, but also do not meet basic State and federal health, safety and environmental regulatory requirements. Specific park needs associated with each of the six project components are described in detail in the EA (pp. 8-18).

The NPS has selected Alternative B(3) – “Implementation of Six Maintenance Project Components, with Rehabilitation of Existing Leach Field and Optional Construction of New Leach Field” (NPS Preferred Alternative), with a “New Leach Field Location North of Existing Field”. The six project components of this alternative are (1) rehabilitation of seven seasonal employee, cabin housing units, (2) removal of four seasonal employee, wall tent housing units and replacement with hard-sided housing units, (3) rehabilitation of the public campground, (4) rehabilitation of the electrical generation and distribution system, (5) replacement of the Lake Brooks pit toilet with a vault toilet and (6) rehabilitation of the existing leach field and construction of an alternate leach field. This alternative will be implemented with mitigation measures described in the EA (pp. 36-37).

The NPS received no substantive comments on the EA and no additional information has been added to the EA. Thus no errata sheet has been prepared.

## **ALTERNATIVES**

The EA evaluated two alternatives: Alternative A – the “no-action” alternative and environmentally preferred alternative; and Alternative B – “Implementation of Six Maintenance Project Components, with Rehabilitation of Existing Leach Field and Optional Construction of New Leach Field” and NPS preferred alternative. Under alternative B, the NPS would implement project components 1-5 described above and

in the EA (pp. 27-31). For component 6, three variations of this alternative, B(1), B(2) and B(3), presented three different construction sites for a new leach field. A fourth variation, B(4), eliminated the new leach field construction (EA pp. 31-34).

#### **Alternative A: No Action (the Environmentally Preferred Alternative)**

Under this alternative, no facility rehabilitation or replacement would be completed for employee housing, visitor services or sanitation at Brooks Camp or Lake Brooks. This alternative represents a continuation of the existing situation and provides a baseline for evaluating the changes and impacts of the proposed action alternative and variations.

The NPS would continue to house seasonal employees in the “obsolete” hard-sided wall tents and cabins currently used for this purpose. No kitchens or toilet facilities would be added to the primitive cabins. Illegal, graywater sump drains at the wall tent sites would continue to be used. The existing campground would remain in its current condition, with deteriorated shelters, unsanitary pit toilets and unlabelled campsites. The park would continue routine maintenance each spring by clearing only downed trees along main pathways and repairing structural damage from weather and bears. Standing hazardous trees in the campground would not be removed. No repairs would be attempted on the existing leach field nor would a new, alternate field be constructed. Electrical generation and distribution systems would not be upgraded. Pit privies at the campground and Lake Brooks visitor entrance would not be replaced.

The no-action alternative is the environmentally preferred alternative, because it would cause less damage to the biological and physical environment. In the long-term, this alternative would result in major impacts to the quality and extent of visitor services due to the lack of adequate utilities, deteriorating campground facilities and inadequate sanitation facilities. Alternative A would have no impact to soils, vegetation, wildlife and cultural resources and a negligible to minor, negative impact to visual quality, water resources and fish.

#### **Alternative B: Implementation of Six Maintenance Project Components, with Rehabilitation of Existing Leach Field and Optional Construction of New Leach Field (NPS Preferred Alternative)**

Under this alternative, the NPS would implement project components 1-5 in the EA (pp. 27-31). Seven seasonal employee cabins would be rehabilitated; four wall tents would be replaced with two hard-sided duplex cabins and provision for utility services; the Brooks Camp campground would be rehabilitated with vault toilets, replaced visitor use structures, and improved trails and campsites; rehabilitation of the electrical distribution and generation system would be initiated; the Lake Brooks pit privy would be replaced with a vault toilet; and the existing leach field would be rehabilitated.

For project component 6, the EA describes four variations of alternative B, B(1), B(2), B(3) and B(4) that include rehabilitation of the existing leach field. Variations B(1), B(2) and B(3) present three different construction sites for a new leach field. The fourth variation, B(4), eliminates the new leach field construction.

##### **Alternative B(1) – New Leach Field Located South of Existing Field**

For this alternative variation, the reserve field would be constructed generally south of the existing field, as shown in the EA (Figure 7, p.17). This location would require the least linear feet of sewer line connection to the junction box, up to approximately 75 feet. This site is located within an archeologically sensitive area delineated by the park cultural resources team (EA, Figure 9. p. 35).

##### **Alternative B(2) – New Leach Field Located West of Existing Field**

For this alternative location, the reserve field would be constructed generally west of the existing field, as shown in the EA (Figure 7, p. 17). This location would require more linear feet of sewer line connection to the junction box than B-1, up to approximately 300 feet. This site is located just outside of an archeologically sensitive area delineated by the park cultural resources team (EA, Figure 9, p. 35).

#### **Alternative B(3) – New Leach Field Located North of Existing Field**

For this alternative location, the reserve field would be constructed generally north of the existing field, as shown in the EA (Figure 7, p.17). Approximately 450 feet of sewer line would be needed to connect the field with the junction box. This site is located outside of an archeologically sensitive area delineated by the park cultural resources team and inside the area the team recommended for placement (EA, Figure 9, p. 35). The Alaska Department of Environmental Conservation (ADEC) would be willing to grant a waiver to allow a reduced minimum separation distance between the sewer line and the water well. For about 200 feet, the sewer line would need to cross over or under existing water, sewer and electrical utility lines.

#### **Alternative B(4) – No New Leach Field**

This variation would only rehabilitate the existing leach field. The NPS would not construct a new leach field on a new site to use as a reserve field.

Alternative B would result in a mixture of positive and negative impacts. Alternative variations B(1), B(2) and B(3) would result in negative minor impacts to wildlife, soils and vegetation; positive impacts to visual quality, water resources and fish; and a range of no to major, negative impacts to cultural resources. The greatest long-term benefit would be to visitor use, with improved visitor services, utilities, campground facilities, sanitation and retention of park staff.

Alternative variation B(4) would result in less negative impact to soils, vegetation, wildlife, visual quality and cultural resources. However, visitor use would sustain an overall, negative moderate impact due to lack of a new, alternating leach field and the risk of leach field failure with imminent Camp closure.

### **PUBLIC INVOLVEMENT**

The EA had a 30-day public comment period beginning July 10, 2006 and ending August 8, 2006. Copies of the EA and a distribution cover letter were mailed or emailed to 86 federal, state and local government agencies, tribal entities, interest groups and individuals. This included five interested Native groups, one concessioner and 34 Brooks Camp Developed Area commercial use operators. In addition, the EA was posted for public viewing on the NPS Planning, Environment and Public Comment (PEPC) national website during the public review period.

The NPS received seven comments about the EA, including a letter from the Alaska Department of Natural Resources (ADNR) Alaska Coastal Management Program (ACMP), a letter from the State of Alaska ANILCA Implementation Program, an email from the Alaska Soil and Water Conservation District, a letter from the US Fish and Wildlife Service (USFWS) Anchorage Fish & Wildlife Field Office, a letter from Katmailand (the Brooks Camp concessioner), a high school group and one individual. The ACMP agreed with the NPS Negative Determination and analysis that the proposed project would not affect the land or water uses of natural resources of the coastal zone. The Alaska Soil and Water Conservation District stated that it supported the replacement of pit toilets with vault toilets. The USFWS determined that the project will have no effect on species protected under the Endangered Species Act of 1973 and concluded the Section 7 consultation. Katmailand stated that the proposed projects are long overdue, and the most important ones to be addressed are the construction of a new leach field and the rehabilitation of the electrical system. The State ANILCA program supported the project to improve conditions for visitors and employees and reduce the potential for negative impacts to

fish, wildlife and surrounding lands and water. An individual stated that the Brooks Camp move described in the DCP should be done instead of causing more damage to the existing prehistoric and historic site. A high school group supported alternative B(2).

The public comments received did not change the conclusions in the EA about the environmental effects of the action. No substantive comments were received, thus no errata sheet has been prepared.

## **DECISION**

The NPS decision is to select alternative B(3), “Implementation of Six Maintenance Project Components, with Rehabilitation of Existing Leach Field and Optional Construction of New Leach Field” with a “New Leach Field Location North of Existing Field”, as fully described in the EA (pp.27-34). This decision includes mitigating measures for cultural resources, soils, vegetation and wildlife.

### **Mitigating Measures**

The following mitigation measures apply to the selected alternative B(3), “Implementation of Six Maintenance Project Components, with Rehabilitation of Existing Leach Field and Optional Construction of New Leach Field” with a “New Leach Field Location North of Existing Field”.

**1. Cultural Resources.** To ensure that each project component complies with Section 106 of the National Historic Preservation Act, archeological investigation will be necessary before ground-disturbing work can be implemented. In addition, the descendants of the people that once lived at Brooks Camp have been given the opportunity to comment during the EA public review period. NPS cultural resource specialists will conduct a field survey of the proposed sites where ground disturbance will take place. Cultural resource specialists will monitor the project component sites during excavation activities.

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

**2. Site Rehabilitation.** For housing rehabilitation and replacement, ground disturbance will be limited to a maximum buffer of 20 feet from the duplex perimeters and cabin additions. For the duplexes, additional ground disturbance will occur for the short utility corridors to tie into existing main lines. Most new water, sewer and electrical lines to the buildings will be installed in previously disturbed areas such as existing utility corridors.

For construction of components, as much as possible, revegetation efforts will take place concurrently with construction activities. Park personnel will make an effort to salvage viable groundcover mats and reduce storage time by expeditiously transplanting them to suitable, disturbed sites such as utility corridors. Wherever possible, in the heavily vegetated areas that must be cleared, mats of ground cover and shrubs will be salvaged and used to revegetate disturbed areas. When possible, larger trees in the area to be cleared but not directly in the footprint of buildings or the leach field, will remain intact with a sufficient root buffer zone.

For all ground-disturbing project components, efforts will be made to avoid introduction of non-native species into the area. Excavation, backfilling, and revegetation will be accomplished with a combination of hand tools and heavy equipment. Cut trees will be used as campground firewood. Stumps and other organic debris will be burned or buried on site.

**3. Wildlife.** As much as possible, tasks will be scheduled during periods of low bear use (e.g., spring, August, etc.) to minimize direct interactions with bears. Since bears are more prone to travel through Brooks Camp after facilities shut down on September 21<sup>st</sup>, one bear management technician may be stationed on site during autumn construction activities. Interactions between bears and people will be minimized by housing some workers in Brooks Camp and by limiting the number of trips made across the river. As much as possible, supplies and equipment will be staged in the vicinity of work areas during periods of low bear use to minimize bear and people interactions. Trees and shrubs in the woodland areas will be cut before May 1st and after July 20th in any given year to avoid disturbance to nesting birds.

### **Rationale for the Decision**

The selected alternative B(3) satisfies the purpose and need for action. It will provide minimally necessary, maintenance corrective actions to address critical life, health and safety issues to keep the Brooks Camp operation functioning at an adequate level over the next several years. NPS management policies and plans and many regulatory agencies mandate that KATM provide a safe and healthy environment for employees and concessioners, as well as the visiting public. To satisfy these obligations and maintain or salvage the NPS declining investment in the Brooks Camp infrastructure, this project will protect and upgrade facilities to support current visitor use levels. This alternative also satisfies the primary Brooks River area purpose statements and protects the Brooks River Area significant resources (EA p. 20).

Addressing each project component, the selected alternative B(3) satisfies the purpose and need for action in the following ways:

1. *Rehabilitate employee housing to provide adequate health, safety and utility service-* KATM would be in compliance with Director's Order 36 and other park plans and policies to provide safe, sanitary and energy-efficient employee housing.
2. *Remove substandard housing from the park housing inventory and replace it with energy efficient, standard quality housing that satisfies regulatory health and safety requirements-* Obsolete housing would be removed from Brooks Camp and replaced with safe duplex housing with standard utilities. Wastewater discharge violations would be corrected and a bear attractant would be eliminated as the graywater sump systems were replaced with sewer service.
3. *Provide an adequate, sanitary and safe public campground –* Campground facilities would be easier to manage, with improvements in site delineation, sanitation and safety. Human waste disposal problems would be corrected with installation of a double-vault toilet in the campground. The park would be in compliance with wastewater disposal regulations of the ADEC and guidance under Director's Order 83.
4. *Correct deficiencies in the current electrical generation and distribution system-* The park would correct critical utility problems such as electrical code violations, inefficient generator loading and lack of optimal fuel conservation. Electrical system generation and distribution problems would be identified, resolved or programmed for corrective actions, thereby reducing risk of personal injury, loss of life and fire.

5. *Provide a sanitary human waste disposal system at the Lake Brooks visitor entrance-* Human waste disposal problems would be corrected with installation of a double-vault toilet. The park would be in compliance with the ADEC and Director's Order 83 wastewater disposal regulations and guidance.

6. *Provide a reliable leach field operation in compliance with State wastewater and public health regulation -* An alternating leach field system would provide an adequate lifespan for a wastewater operation and eliminate the risk of field failure and subsequent Camp closure. For visitor-related services, the NPS could continue the Katmailand concessions contract without risk of committing a breach due to lack of basic safety, sanitation and utility services. The ADEC wastewater regulations and maintenance concerns would be satisfied by providing an alternate field.

Alternative B variations B(1) and B(2) would risk a high potential for major, negative impacts to cultural resource impacts, since the new leach field locations are located in culturally sensitive areas. Alternative B(3) is located in a less sensitive area, recommended by NPS archeologists. Thus, alternatives B(1) and B(2) were not selected for implementation because they involved high potential for negative impacts to cultural resources.

Alternative A, by contrast, would negatively impact park management operations from a moderate to a major degree. This would result from inadequate, unsafe, substandard seasonal housing facilities; lack of safe, reliable utilities and increasing visitor dissatisfaction with facilities and services. Without a reliable leach field operation, the NPS would continue to operate out of compliance with regulatory standards. In the event of leach field failure, NSP employees would have to mitigate raw sewage spills on the ground near the housing area during the height of visitation. Management would be faced with certain, unrelenting public pressure to act swiftly to correct deficiencies. In addition, a leach field failure could result in the closure of Brooks Camp operations, for a short or long duration, possibly leading to a breach of the Katmailand contract, further visitor dissatisfaction and many public relations problems for management. Thus, Alternative A was not selected for implementation because it would not satisfy the purpose and need for the action and would compromise Brooks Camp operations.

A cost comparison between the leach field alternatives (EA p. 63) shows that alternative A would be the most expensive recurring annual expense of \$4,000, versus \$660 for alternative A and B variations. The initial one-time costs for alternative B would range from \$71,000 (B1) to \$100,000 B(3). Life Cycle costs would range from \$19,600 for B(4), \$60,000 for A and \$109,000 for B(3). This is based on assumptions that a new leach field will have a lifespan of 15 years and the initial one-time cost of rehabilitating the existing leach field will be approximately \$10,000. These initial one-time costs do not include Section 106 cultural resources compliance costs.

### **Significance Criteria**

Alternative B will not have a significant effect on the human environment. This conclusion is based on the following examination of the significance criteria defined in 40 CFR Section 1508.27.

*(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 will be beneficial.* Alternative B will have no impacts on air quality; soundscape; wetlands; wilderness; threatened, endangered or other special status species; subsistence; local economy; minority and low income populations and ANILCA Section 1306. Impacts to visual quality, water resources, fish; soils, vegetation, wildlife, cultural resources and visitor use will range from none to moderately positive.

*(2) The degree to which the proposed action affects public health or safety.* Employee and visitor safety and health will be improved to meet acceptable, regulatory standards.

*(3) Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetland, wild and scenic rivers, or ecologically critical areas.* The Brooks Camp projects are located within the Brooks Camp National Historic Landmark.

*(4) The degree to which effects on the quality of the human environment are likely to be highly controversial.* The EA analysis and public comments do not indicate that any effects presented in the EA are controversial.

*(5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.* The EA analysis and public comments do not indicate that any effects are highly uncertain or involve unique or unknown risks.

*(6) The degree to which the action may establish a precedent of future actions with significant effects or represents a decision in principle about a future consideration.* The proposed action does not establish a precedent for future actions with significant effects or represent a decision about a future consideration.

The 1996 *Development Concept Plan, Brooks River Area* (DCP) and *Record of Decision* (ROD) called for removing all facilities at the present Brooks Camp location and developing a new site south of the Brooks River for visitor services and support facilities. This Environmental Assessment (EA) is procedurally connected or “tiered” to the larger-scale DCP and Environmental Impact Statement (EIS) completed in 1996. The NPS stands by the original decision to eventually move the Brooks Camp operation south of the Brooks River to the Beaver Pond Terrace. This EA describes minimal maintenance tasks justified under critical need (life/health/safety) categories.

*(7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.* The proposed action will not act in conjunction with other actions to produce cumulatively significant impacts.

*(8) Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.* Each project component of alternative B (3) will comply with Section 106 of the National Historic Preservation Act. Mitigation measures will be employed (EA p. 36) and construction activities will be monitored closely by archeologists. For the alternate leach field, the NPS will perform archeological testing and consultation to choose the best location that will avoid or mitigate adverse effects to cultural resources.

*(9) The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.* According to the USFWS, the project will have no effect on species protected under the Endangered Species Act of 1973 and therefore concluded the Section 7 consultation.

*(10) Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.* Alternative B does not violate any federal, state or local environmental protection laws. In fact, it will correct several current problems with wastewater management under state regulations.

## **FINDINGS**



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

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

The National Park Service has determined that the selected alternative does not constitute a major federal action significantly affecting the quality of the human environment. Therefore, in accordance with the National Environmental Policy Act of 1969 and regulations of the Council on Environmental Quality (40 CFR 1508.9), an environmental impact statement is not needed and will not be prepared for this project.

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