

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

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



**Finding of No Significant Impact**

**Lake Brooks Maintenance Facility**

**September 2007**

Recommended:

*Ralph Moore*

*9/18/07*

Superintendent, Katmai National Park and Preserve

Date

Approved:

*Hester*

*9/20/07*

Regional Director, Alaska

Date

## **FINDING OF NO SIGNIFICANT IMPACT**

### **Lake Brooks Maintenance Facility Katmai National Park and Preserve, Alaska September 2007**

The National Park Service (NPS) prepared an environmental assessment (EA) to evaluate a proposal to construct replacement maintenance facilities and park housing in the Brooks River area of Katmai National Park and Preserve, Alaska.

The NPS has selected Alternative 2, the Proposed Action (NPS Preferred Alternative), with mitigation measures and modifications.

The Federal Highway Administration (FHWA) was a cooperating agency on the EA.

The project activities will accomplish the following:

- Relocate and replace maintenance facilities currently located in the vicinity of Lake Brooks in Katmai National Park and Preserve (Katmai or the park). Existing facilities would be removed after full cultural investigation according to Section 106 of the NHPA and NPS Management Policies (2006).
- Construct two duplex housing units in the park in the vicinity of the new location for maintenance facilities. Existing housing units (tent structures) in the Brooks Camp area would be removed and the sites rehabilitated to a natural condition.
- Develop a conceptual design for future employee housing and other administrative structures in the park. Structures would be located in the vicinity of the new location for the maintenance facilities and the proposed location for the duplex housing units. Maintenance structures, laundry facilities, and concessionaire maintenance facilities are examples of administrative structures in the park.

Fourteen written comments were received during the 30-day public comment period. An attachment provides NPS responses to substantive public comments, as well as the changes made to the EA.

## **ALTERNATIVES**

Two alternatives were evaluated in the EA.

### **Alternative 1, No Action (the Environmentally Preferred Alternative)**

The NPS would continue to operate, administer, and maintain the existing facilities at the Lake Brooks and Brooks Camp areas of Katmai. No facilities would be removed, relocated, or constructed, and additional conceptual design work would not be completed. Existing facility deficiencies would not be addressed and would continue at the present levels. Cultural resources

would continue to be threatened due to existing facilities and activities on or near sensitive archeological sites. No actions would be taken to implement the Development Concept Plan (DCP) and Environmental Impact Statement (EIS) for the Brooks River Area (1996) regarding relocating facilities. This alternative represents a continuation of the existing situation.

### **Alternative 2, Proposed Action (NPS Preferred Alternative)**

The NPS would implement three project components, providing for administrative facilities in support of park functions. They do not directly provide for the construction of visitor use facilities.

***1) Relocate and replace several of the maintenance facilities currently located at Lake Brooks.*** New replacement maintenance facilities would be constructed at a new site about one-quarter mile east of their current location (EA, Figure 5). Project relocation, construction, and rehabilitation activities would include:

- Clearing trees (fall 2007), undergrowth and tundra vegetation from the site; grading and hardening the site (summer 2008); and fencing a new maintenance yard approximately 250' by 200'.
- Constructing a single new 3,500 square foot shop building and its associated utilities inside the new maintenance yard. The shop would include a vehicle repair area, space for plumbing, carpentry, electrical or mechanical repair, a small office, an employee restroom, storage space, a waste heat boiler, potable water treatment equipment, and automatic electric switchgear.
- Relocating two 35-kW diesel generators from the shores of Lake Brooks and siting them next to the shop building.
- Constructing a new curved (to provide visual screening) access road from the Valley of Ten Thousand Smokes road to the new maintenance yard (summer 2008).
- Relocating the existing fuel storage facility (5,000 gallons of diesel and 4,000 gallons of gasoline) from the shores of Lake Brooks to the new maintenance yard.
- Installing a new buried power line, cross-country, between the relocated generators in the new maintenance yard and the remaining facilities (mostly employee residences) at Lake Brooks, and building a foot path for NPS staff on top of the filled-in trench.
- Demolishing, and rehabilitating to a natural appearance, existing maintenance facilities and sites near Lake Brooks. Rehabilitation would be done so as not to disturb sub-surface cultural artifacts, if any. Revegetation would be accomplished passively, by providing the proper surface conditions, without active replanting or seeding. The historic Bureau of Fisheries, USFWS headquarters and laboratory by Lake Brooks, which is over 50 years old, would not be removed or altered. Other buildings associated with the Bureau of Marine Fisheries Management would be evaluated for eligibility to the National Register of Historic Places (NRHP) to determine appropriate treatment. The decision for the final treatment of the potential historic structures would not be made until a determination of their eligibility to the NRHP is completed.

- Installing new potable water well in the vicinity of the new maintenance yard, and installing new buried water lines to various locations in or near the new maintenance yard.

**2) *Construct two duplex housing units in the vicinity of the new maintenance facilities.*** Two new employee housing duplex units near the new maintenance yard would be constructed to replace four existing wall-tent employee housing structures currently located in the Brooks Camp area. A septic leach field would be constructed to serve the employee housing units. Associated utilities would be constructed (i.e., buried water lines, and a buried power line between the area generators in the maintenance yard and the housing units).

The four wall-tents currently located at Brooks Camp would be removed and their former site would be rehabilitated to a natural appearance. Rehabilitation would be done so as not to disturb sub-surface cultural artifacts, if any. The tent frames from the wall-tents would be dismantled using hammers and saws. Wooden pieces would be hauled by park vehicles and disposed of in the Brooks Camp incinerator. Non-burnables would be transported by barge and recycled or disposed of in the King Salmon landfill. Revegetation would be accomplished passively, by providing the proper surface conditions, without active replanting or seeding.

**3) *Develop a conceptual design for future employee housing and other administrative structures in the vicinity of the new maintenance facilities.*** A design would be completed for future structures to be located in the vicinity of the new maintenance yard and duplex housing units. Maintenance structures, laundry facilities, concessionaire maintenance facilities, and additional housing are examples of administrative structures in the park which would be relocated to the new site (EA, Figure 6) under this conceptual design. There would be one access road to the new site, from the Valley of Ten Thousand Smokes road. Precise footprints and locations for these facilities are not yet designed and therefore impacts on resources cannot be analyzed. Future build-out actions of this component #3 would be subject to additional planning and NEPA compliance. This component of the EA is for conceptual design, not for completed construction. It is to refine the direction given in the DCP/EIS about the relocation of administrative facilities – out of the Brooks Camp area to a new site up the Valley of Ten Thousand Smokes road that would reduce pressures on the sensitive archeological resources, bear habitat, and heavy visitor use areas.

### ***Mitigation***

Mitigation measures are specific actions that would reduce impacts, protect park resources, and protect visitors. Measures to avoid or minimize environmental impacts from the proposed action have been identified and incorporated into the Proposed Action. Best management practices (BMPs) would be followed to minimize impacts. The following mitigation measures would be implemented by the proposed action alternative and are assumed in the analysis of impacts.

**Gravel:** Gravel for construction would come from existing NPS gravel pits that have been analyzed and approved in a separate NEPA process (NPS 1997).

**Visual Resources:** To the greatest practical extent, impacts to visual resources from construction and operation activities would be minimized. This would be accomplished through

various means, such as locating new administrative facilities away from key visitor viewpoints and utilizing natural screening. In addition, timing construction during traditionally low use time periods would also minimize visual impacts of project activities.

**Visitor Use:** Procedural steps would be taken to ensure that project construction and operation would minimally interfere with visitor use of park areas. This would be accomplished by means such as moving most of the materials and accomplishing tasks that may inhibit visitor movement during traditionally low use time periods (i.e., early June).

**Wildlife:** It is expected that construction tasks would occur throughout the summer and thus, sometimes coinciding with periods of high bear activity. However, to the greatest practical extent, many tasks would be scheduled during periods of low bear use (i.e., spring, August, etc.) to minimize both direct and indirect interactions with bears. Similarly, as much as possible, supplies and equipment would be staged in the vicinity of work areas during periods of low bear use to minimize bear and human interactions. As per the Migratory Bird Treaty Act (MBTA) (16 U.S. C. 703), there would be no tree cutting from April 10<sup>th</sup> to July 15<sup>th</sup> in order to protect nesting migratory birds. If Steller's eiders are observed within the project area proper USFWS protocol would be followed. If species of special concern identified by the State of Alaska or by the USFWS are identified within the project area, the USFWS or Alaska Department of Fish and Game would be notified, as appropriate.

**Cultural Resources:** To ensure that each project component complies with Section 106 of the National Historic Preservation Act (NHPA), archaeological investigations have been completed for the project site. Archeologists surveyed the new road and buried power line path. No cultural resources have been located and the State Historic Preservation Officer (SHPO) concurred with the NPS determination that shallow-burying the electric line in conduit across XMK-008 at Lake Brooks would constitute "No Adverse Effect" to archeological resources.

Cultural resources specialists would monitor the project sites during excavation activities. Should previously unknown cultural resources be identified during project implementation, work would be stopped in the discovery area. The NPS would perform consultations in accordance with 36 CFR 800.11. The resources would be evaluated to determine if they are eligible to be listed on the National Register of Historic Places (NRHP). If proposed excavation locations could not be adjusted to avoid adversely affecting eligible cultural resources, the NPS would execute a Memorandum of Agreement (MOA) with the Advisory Council on Historic Preservation and the Alaska SHPO that would incorporate comments from consulting parties. The MOA would specify measures to minimize or mitigate adverse effects. Furthermore, as appropriate, the NPS would abide by provisions of the Native American Graves Protection and Repatriation Act of 1992.

Any artifacts recovered from park property at the project site would be accessioned, cataloged, preserved, and stored in compliance with the NPS *Collections Management Guidelines*.

The historic Bureau of Fisheries, USFWS headquarters and laboratory by Lake Brooks, which is over 50 years old, would not be removed or altered. Other buildings associated with the Bureau of Marine Fisheries Management would be evaluated for eligibility to the NRHP to determine

appropriate treatment. The decision for the final treatment of the potential historic structures would not be made until a determination of their eligibility to the NRHP is completed.

**Vegetation and Soils:** To minimize potential for introduction of invasive plants, any offsite equipment or materials would be inspected and cleaned (pressure washed) prior to their movement to the project site. Overburden removed from construction areas would be stored in a nearby gravel pit and redistributed on disturbed sites of the project when construction is complete. No new disturbance would occur at the storage sites or staging areas.

**Natural Sound:** It is expected that construction tasks would occur throughout the summer. However, to the greatest practical extent, construction and operation actions would not interfere with the natural sounds of the areas (i.e., bird calls and rustling leaves). Onsite machinery would meet manufacturer specifications for noise emissions. Any machinery brought in to the site would be equipped with current technology (mufflers) to help mitigate noise emissions. Operations would be timed, to the greatest practical extent, to coincide with low use seasons for wildlife and visitors.

**Water Quality and Fisheries Resources:** A Storm Water Pollution Prevention Plan (SWPPP) would be completed in accordance with the Alaska Department of Transportation and Public Facilities *Storm Water Contractor Guidance For Preparing and Executing Storm Water Pollution Prevention Plans*, which would comply with the National Pollution Discharge Elimination System General Permits for Storm Water Discharges from Construction Activities that are classified as *Associated with Industrial Activity*. The SWPPP would include project BMPs to reduce runoff and avoid water quality impacts. BMPs would include using clean fill material, minimum clearing distances, silt fences, and sediment basins to reduce erosion during construction, dust abatement, and roadside culverts to maintain natural drainage and surface water flow patterns.

## **PUBLIC INVOLVEMENT**

The EA was issued for public review and comment from June 13, 2007 to July 15, 2007. The EA, or notices of the EA, were sent by mail or email to approximately 79 government agencies, tribal entities, organizations, interest groups, and individuals. The EA was posted on the NPS Planning, Environment, and Public Comment (PEPC) website and on the park's webpage. The park issued a press release about the availability of the EA and the open comment period on June 14, 2007.

Comments were received from 14 individuals and organizations. The comments did not change the conclusions in the EA concerning environmental effects of the Proposed Action. NPS responses to substantive public comments are attached.

Several commenters disagreed with the EAs justification for rejecting additional alternatives in Section 2.5, especially for rejecting the exact location of the maintenance facility as depicted in the 1996 DCP/EIS. This additional justification is addressed below and in the attached reply to comments.

## **DECISION**

The NPS decision is to select Alternative 2, Proposed Action (NPS Preferred Alternative), along with the mitigating measures.

### **Mitigating Measures**

All mitigation measures have been incorporated into the selected alternative and are described above.

### **Rationale for the Decision**

The selected action will satisfy the purpose and need of the project better than the other alternative because it will provide for partial implementation of the 1996 Brooks River Area DCP to 1) relocate and replace maintenance facilities currently located at Lake Brooks; 2) relocate and replace employee housing units currently located at Brooks Camp; and 3) develop a conceptual design for future administrative facilities at the new site and away from Brooks Camp. The selected action will improve the safety and efficiency of maintenance and administrative support facilities, enable adequate maintenance for visitor facilities, provide resource protection, and comply with state and federal regulations.

From the more general concepts approved in the 1996 DCP, to the more specific actions described in the EA, the project is consistent with earlier planning direction and implements their intent, at least in part, to remove facilities from visitor use areas, sensitive bear habitat and sensitive archeological areas. The project improves operational efficiencies and employee safety by providing an efficient, central shop area, fenced from bears, and with fuel storage away from the sensitive lake shore. The current shop areas are scattered, substandard, unsafe, and hazardous for employees due to abundance of bears in the area.

The proposed action is consistent with the park's 1986 General Management Plan.

The reasons for rejecting the no action alternative are that it would not satisfy the purpose and need. The no action alternative would not improve the safety and efficiency of maintenance and administrative support facilities. It would not implement the DCP direction to move facilities out of Brooks Camp. It would result in continued use of the scattered and inadequate maintenance facilities at Lake Brooks and of the lakeside fuel storage tanks. Operational efficiency of park management would not be realized. The safety hazards associated with employees working in the open in areas frequented by brown bears would continue.

### **Significance Criteria**

The selected alternative 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.*

The selected action will result in **minor** negative impacts to **visual resources**. Clearing the new site will create a break in the natural landscape, visible from floatplanes and higher elevations. Relocation of facilities and generators from the shore of Lake Brooks to a site screened from visitor use areas will reduce the visual impacts for visitors. The new facility sites will not be visible to visitors traveling on the Valley of Ten Thousand Smokes road. Removing the existing wall-tents at Brooks Camp will improve the visual resources in that administrative area.

The selected action will result in **minor** temporary impacts to **visitor use** during construction and excavation activities.

The proposed action will result in **minor** temporary impacts to **wildlife** from construction activity. Brush and trees in the previously undisturbed area will be cut after July 15<sup>th</sup> and before April 10<sup>th</sup> to avoid impacts to nesting birds and to comply with the Migratory Bird Treaty Act. Destruction of four acres of vegetated natural wildlife habitat will occur.

The proposed action will result in **minor** impacts to **cultural resources**. No ground-disturbance will occur when demolishing existing structures or rehabilitating sites. The new facility site has been archeologically surveyed, with negative results. Indirect beneficial effects will include a reduced level of human activity in the vicinity of non-historic structures removed from culturally sensitive areas.

The selected action will result in **moderate** long-term impact to **vegetation and soils** from clearing and development of four acres. Direct impacts will be from loss of plant habitat, native plant cover, and a potential reduction in function, such as biomass production or carbon dioxide sequestration. Indirect impacts will be from the threat of invasive exotic plants increasing on the rehabilitated sites. Impacts will include compaction, direct loss of soil cover in the area of the new facilities, and erosion.

The proposed action will result in **minor** impacts to **natural sound** from temporary intrusion of noise during the construction and facility removal. Human-produced sounds from the housing and maintenance functions (especially generator) will be similar to the existing impacts, but will be relocated to a site farther from visitor use areas.

The selected action will result in **negligible** impacts to **socioeconomics** from construction contracts and material purchases creating new local employment opportunities. No impacts will be on existing concession operations.

The proposed action will result in **minor** beneficial impacts to **water quality and fisheries resources** from adherence to the SWPPP, reduced potential for accidental petroleum spills near Lake Brooks, and relocation of some employee housing away from the Brooks Camp sanitation facilities.



*(2) The degree to which the proposed action affects public health or safety.*

Relocation of the large fuel tanks away from the Lake Brooks shoreline and floatplane landing zone would improve public safety by eliminating the risk of explosion from floatplane impact. Consolidation of scattered maintenance functions into one shop would substantially reduce the employee safety hazard of working in unfenced shop areas with potential for brown bear encounters. Replacement of hard-sided tent housing with new duplexes would improve employee health and safety by providing NPS standard quality housing, reduced mold problems and protection from bears.

*(3) Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetland, wild and scenic rives, or ecologically critical areas.*

The project area is located in Katmai National Park along an unconnected dirt road in the isolated Brooks River area. The project area is a one-mile-wide wooded isthmus, gently sloping towards the two adjacent lakes. At the lake shores, or flying in by floatplane, scenic views of the grand Alaskan wilderness landscape surround the area. The project site was surveyed for wetlands and found to contain none. Significant cultural resources, especially pre-historic sites along the lake shores, have been identified, but the inland project site has been surveyed for cultural resources and found to contain none. The wooded project site is used by brown bears, especially for seasonal travel to and from the Brooks River area for the summer salmon runs, but the site is not designated as critical habitat. These unique characteristics will not be significantly adversely affected by the selected alternative.

*(4) The degree to which effects on the quality of the human environment are likely to be highly controversial.*

The project's environmental effects are not highly controversial. The removal of maintenance facilities from the Lake Brooks area is not controversial. However, the project includes removal of one or more structures which are over 50 years old and may be contributing structures to a National Register property associated with an early-to-mid-twentieth century fishery station. Demolition of these historic structures would be preceded by full cultural investigation according to Section 106 of the NHPA and NPS Management Policies (2006). The removal of four tent frames from the employee residence area of Brooks Camp is not controversial, so long as they are not replaced with other administrative structures, which will not occur. The construction of the new administrative facilities (maintenance yard and two duplexes) along the Valley of Ten Thousand Smokes road is not controversial.

*(5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.*

The effects of the selected alternative do not involve unique or unknown risks, except for the standard minor risk to unidentified buried cultural resources that may exist at the project site. If any such buried resources are discovered during construction, the excavation work will stop until the resources are evaluated.

*(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 selected alternative would not establish a precedent for future actions or represent a decision on principle about a future consideration, other than the direction already approved in the DCP. The conceptual plan for future administrative facilities at the project site (e.g., laundry facilities, concessionaire or NPS maintenance facilities, additional housing) represents a commitment to the direction made in the DCP to move facilities out of Brooks Camp. These are not new plans or actions, but they reiterate the DCP decision for future actions. The more detailed construction plans and associated environmental documents for these future administrative facilities will follow at a later date.

*(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 action is not related to other actions with individually insignificant but cumulative significant impacts. The action is a relatively small part of the approved DCP direction.

*(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.*

The selected alternative would not significantly adversely affect the Brooks District National Historic Landmark, or the listed or eligible historic structures at the Lake Brooks area. The removal of maintenance facilities from the Lake Brooks area would include the removal of one or more structures which are over 50 years old and may be contributing structures to a National Register property associated with an early-to-mid-twentieth century fishery station. Demolition of these historic structures would be preceded by full cultural investigation according to Section 106 of the NHPA and NPS Management Policies (2006). There are no known cultural or archeological resources which would be affected at the four-acre new construction site, except potentially for the buried power line to the Lake Brooks area. This buried line would pass through a known pre-historic site, but would avoid the cultural resources by staying in the thin layer of Katmai ash that covers the site. No known scientific resources would be adversely affected by the project.

*(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.*

The selected alternative would not adversely affect a listed or proposed, endangered or threatened species or its habitat.

*(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 would not violate any Federal, State, or local law.

## **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; the Migratory Bird Treaty Act; Coastal Zone Management Act; Executive Orders 11988 (Floodplain Management) and 11990 (Protection of Wetlands); and the Safe, Accountable, Flexible, Efficient Transportation Equity Act (SAFETEA) which authorizes FHWA programs. 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.

**ATTACHMENT A**

**NPS RESPONSES TO PUBLIC COMMENTS and ERRATA**  
**for the**  
**Katmai National Park and Preserve EA for**  
**Lake Brooks Maintenance Facility**

This attachment provides NPS responses to public comments and amends the subject EA.

**PUBLIC COMMENTS**

The NPS received 14 public comments: 11 from private individuals (PI), one from an agency (the State of Alaska, ANILCA Implementation Office [AK]), and two from organizations (the National Parks Conservation Association [NPCA], and the Sierra Club [SC]).

Many comments support the general concept of relocated maintenance and housing facilities, but many comments support the no-action alternative especially because the location of the new facilities is different from the one selected in the 1996 DCP EIS.

The NPS has read and considered all comments received. Responses to substantive comments are provided below. A substantive comment is defined as one which leads the NPS to: (1) modify an alternative, including the proposed action; (2) develop and evaluate an alternative not previously given serious consideration; (3) supplement, improve, or modify the environmental analysis; or (4) make factual corrections (CEQ NEPA Regulations 1503.4).

**Comment 1, PI1:** The NPS may convert the abandoned structures to other administrative purposes that could include volunteer quarters, in which case it would defeat the primary purposes of reducing the developed footprint of Brooks Camp. If the existing maintenance structures are not removed and the site returned to its original condition then the end result would constitute an expansion of the intrusive footprint.

**Response 1, NPS:** The project will replace structures from two areas, the Lake Brooks area, and Brooks Camp. The Lake Brooks area facilities are maintenance facilities. The Brooks Camp facilities are employee housing tent frame structures. The tent frames will be dismantled and removed and the sites will be rehabilitated to a natural condition. The tent frames will not continue to be used for housing or other uses. This will ensure the purpose of reducing the footprint at Brooks Camp. At the Lake Brooks area, one or more of the facilities being replaced are over 50 years old and may be contributing features to the National Register eligible Bureau of Marine Fisheries Management station from the early-mid-twentieth century. Demolition of these historic structures will be preceded by full cultural investigation according to Section 106 of the NPS and NPS Management Policies (2006). The Brooks Lake structures are unsuitable for use as employee housing and cannot be converted to volunteer quarters. All of the Lake Brooks maintenance facilities depicted in red on the revised Figure 7 (attached) will be removed and the sites rehabilitated to a natural vegetation condition.

**Comment 2, PI2:** It is unclear whether the structures being replaced would be removed. The EA should specifically identify each structure that would be included in the proposed action, and for each structure identified, what the specific plans are regarding upgrade/replacement and removal.

**Response 2, NPS:** See NPS response 1 above and revised EA Figure 7 (attached). At Brooks Camp, only the four tent frames will be removed. At Lake Brooks, the Mechanics Shop, Fuel Tanks, Fueling Stand, Propane Storage, Generators, Bat Shed, Carpenter Shop, Plywood Storage Shed, and Generator Building will be removed. Demolition of any historic structures will be preceded by full cultural investigation according to Section 106 of the NHPA and NPS Management Policies (2006). The Park Cultural Resources team will conduct the Section 106 process in accordance with State and federal protocols under the NHPA and other cultural resources laws, regulations and guidance. The historic BL-3 log building currently used for employee housing will not be removed.

**Comment 3, PI2:** The EA is not consistent with the DCP. The DCP illustrates in a conceptual map that management support facilities will be located east of the access road to the Beaver Pond Terrace, thus out of view and earshot of people traveling to the river, and >1.5 km away from the Valley of Ten Thousand Smokes road intersection and Brooks River. In contrast, the proposed site for maintenance facilities and housing described in this EA is within about 160 m of the Valley of Ten Thousand Smokes road intersection.

**Response 3, NPS:** Page 101 of the DCP shows a figure of Alternative 5 labeled “conceptual,” with two bubbles for Management Support Facilities. Neither the text of the DCP nor its Record of Decision mentioned the specific location of these Management Support Facilities. The NPS views this DCP direction as conceptual and not as specific site selection. The DCP Summary states generally that the employee housing and an expanded maintenance facility will be built along the Valley of Ten Thousand Smokes road near the new public facilities. The EA is consistent with the DCP emphasis to move facilities out of the sensitive Brooks Camp area, to lessen impacts to prime bear habitat, archeological and ethnographic sites. The new administrative facility site is along the Valley of Ten Thousand Smokes road, but not as far east as shown in the bubble on the DCP figure. It is located out of view from people traveling along the road and is within the Brooks Camp Developed Area. Following the intent of DCP Alternative 5, facilities will be removed from the north side of the river and relocated south of the prime resources area.

**Comment 4, PI2:** In order to avoid impacts to bears, the EA states that “tasks would be scheduled during periods of low bear use,” but specific time frames should be identified, as should other mitigation measures, such as stop-work policies when bears are in the vicinity, and staging of project materials and equipment in advance during periods of low bear use.

**Response 4, NPS:** Specific time frames for conducting or not conducting specific project activities are not available and have not been developed. If these are needed, they will be developed in consultation with the park management team and included in the project construction contract. The snow-free construction season is short and the bear activity period coincides with most of this season. The pre-placement of construction materials depends on available funding, adequate lake water levels for barge transport and availability of bear-proof, covered storage areas located near the construction site. Water levels are sufficient for barge transport to Naknek Lake only during July through early October. Park staff routinely stage

activities related to the opening, operation and closing of Brooks Camp every year. With each new project, the management team considers and balances the optimal timing of all Camp activities. Additional, reasonable bear-human avoidance scheduling and other procedures (for both bear and human safety) will be taken and will be developed as needed, but they are not specifically identified at this time.

**Comment 5, PI2:** Relocating some housing to the proposed site while facilities continue to operate on the north side of the river could result in increased human traffic across the lower river between the new housing and Brooks Camp. This could result in increased bear-human conflicts, and in increased vehicle use (due to darkness during certain hours) and human foot traffic during times of low light in periods of high bear use in the lower river.

**Response 5, NPS:** The NPS agrees that the phased moving of housing from Brooks Camp to the south side of Brooks River could increase human traffic across the river. However this is the nature of a phased program of change and is a response to the realities of limited project funding. The DCP cannot be accomplished all at once with one large fund, so phased funding and implementation is to be expected. Park management will address the issues of human traffic and the potential for bear-human conflicts with each implementation phase. Possible solutions could include changes in staff assignments and work schedules and a shuttle service.

**Comment 6, PI3:** The overarching defect is the idea that placing new maintenance facilities/employee housing units in the proposed location initiates implementation of the 1996 DCP preferred alternative. This is false. What this EA does is repudiate the DCP decision and replace it with a plan that has not seen adequate public comment or environmental screening.

**Response 6, NPS:** The NPS rationale in selecting the proposed action in the EA is that it follows and implements the DCP. An underlying concept of the DCP is that all facilities and visitor use in the area north of Brooks River should be relocated to lessen the impact on bear habitat and cultural resources. This concept from the DCP is implemented in the selected action of the EA. Some of the employee housing will be moved from Brooks Camp to south of the Brooks River, and a conceptual design will be developed for future employee housing and other administrative structures to be constructed at the new site south of the Brooks River (moving them out of Brooks Camp). In addition, the major NPS maintenance functions will be removed from the Brooks Camp area and located at the new site south of the Brooks River. All of these actions are called for in the DCP and implement its direction. The EA was developed through an interdisciplinary team approach with park staff familiar with the area and its constraints. This assured that reasonable environmental information was available. The EA received full internal and public review prior to this decision document.

**Comment 7, PI3:** The EA gave no legitimate reason why new maintenance facilities are needed. It does not address short-term consequences of the project on the natural and cultural resources. It does not address the overall functioning of the Brooks River area. The EA diverges so wildly from the original DCP/EIS Record of Decision that the only way that it should be allowed to initiate is with a completely new planning process.

**Response 7, NPS:** The new maintenance facilities are needed because the existing facilities are inadequate. They are near visitor use areas, wildlife habitat, and archeological sites. The fuel storage location next to Lake Brooks poses a spill hazard to aquatic resources and an explosion hazard to incoming floatplanes. The NPS acknowledges that the EA did not provide detail about

the life/health/safety deficiencies of the current facilities. Currently, for example, maintenance employees conduct heavy equipment repairs and welding operations outdoors on a cement slab near the small maintenance shop. Similarly, carpentry work is done inside a cramped carpentry shed. Workers are exposed to these unsafe working conditions on a daily basis. Work functions are scattered among six locations, resulting in inefficiencies in labor, tool storage, travel and project coordination. The project's consequences to natural and cultural resources were discussed in section 4.4 of the EA, including a thorough analysis of impacts to visual resources, visitor use, wildlife, cultural resources, vegetation and soils, natural sound, socioeconomic, water quality and fisheries resources. The overall functioning of the Brooks River area was presented in the DCP and in the EA Section 1.2. The selected action from the EA does not include the DCP's conceptual map or direct the specific location of the administrative facilities. Even so, the selected action follows the letter and the intent of the Record of Decision.

**Comment 8, PI4:** There was an inadequate period for inviting public comment.

**Response 8, NPS:** A 30-day public comment period is standard for EAs.

**Comment 9, PI4:** There has been no serious study of the possible impact on bear routes of the site proposed.

**Response 9, NPS:** It is true that the NPS conducted a limited study of impacts on bear routes in the new construction area. Even so, the EA relied on best available knowledge from staff and others on impact issues. Based on preliminary surveys conducted by park biologists in 2005 and 2007, high-use bear trails would not be directly impacted. The proposed maintenance yard avoids high-use bear trails that lie to the east and west. It does, however, cut through one low-use bear trail and borders one medium-use bear trail. Biologists reason that since bear trails are numerous throughout this area, bears would divert to nearby trails to reach their destinations. As a general rule, the farther the administrative facilities are removed from the locations on the river and lake shores where bears feed on salmon, the better. The interdisciplinary team that selected the site attempted to identify and avoid major bear trails near the area. The NPS feels that the impacts to bear habitat from the selected action are equivalent to the impacts that would have occurred at the location for the management support facilities shown in the concept bubble on page 103 of the DCP.

**Comment 10, PI4:** With the lodge remaining where it is, lodge employees will have to cross the bridge (a new bridge) to get to work – and go home. Given the chosen location, it is unrealistic to think that employees, park and lodge, will walk up the road in the later evenings. While there is no public announcement or acknowledgment, the word is that the park is intending to put in a new and very large bridge, running from the spit end of the lower platform directly across to the Corner. The 2007 plan is very much part and parcel of a set of decisions intended to keep the lodge where it currently stands while still appearing to honor the spirit of the 1996 DCP-EIS.

**Response 10, NPS:** As employee housing is gradually relocated to the new site, more employees will have to cross the river to go to work and go home, just as employees housed at Lake Brooks do currently. One advantage of the selected location for replacement housing is that it is relatively closer to the current work sites at Brooks Camp and Lake Brooks, while still providing a good location for any future work sites relocated to the Beaver Pond Terrace. The new administrative facilities will be out of view of the Valley of Ten Thousand Smokes road, so not intrusive to visitors traveling along the road. The EA does not alter the DCP decision to

eventually move the Brooks Camp operation south of the Brooks River. There are no current plans to construct a new bridge across the Brooks River, so this speculation was left out of the EA section on reasonably foreseeable future actions and is considered beyond the scope of the EA.

**Comment 11, PI5:** The EA does not address whether the new location has similarly attractive features for bears.

**Response 11, NPS:** Section 4.4.3 of the EA addressed the positive impacts to bears from the proposed action. Compared to the no action alternative, the selected action will have greater benefits to bears. Certain administrative facilities (and the associated activities) will be removed from Brooks Camp (tent-frame residences) and from the Lake Brooks area (maintenance structures). These existing facilities are near to the lake shores where bears are more frequent, and the new site is in an upland site removed from the lake shores and the river, so bear use is less frequent. This is one of the objectives of the project – to move facilities and activities out of prime bear habitat, and relocate them to a site that is less important to bears.

**Comment 12, PI5:** The EA is deficient in that it does not sufficiently address the issue of existing bear movement in the area of the proposed new facility.

**Response 12, NPS:** Section 3.4 of the EA addresses bear habitat, movement and trails. A detailed bear movement study has not been done in the project area, so the EA relies on best available information from staff bear biologists and others. See response 9.

**Comment 13, PI5:** There is a piecemeal approach in this EA to the planning for implementation of the 1996 DCP/EIS.

**Response 13, NPS:** The subject EA is an implementation plan. It tiers off of the more complex DCP. As such, it has a limited scope. It presents information in more detail than the DCP, about the proposed action and its impacts. It addresses only the items within its scope and does not re-analyze other decisions made in the DCP.

**Comment 14, PI5:** It is premature to relocate many facilities to the new enclosure when the movement of the remaining Brooks Camp facilities to the south of the river is as yet unplanned and unscheduled. Location of the generators away from Brooks Camp to the new facilities appears premature. Until there is a clear plan for moving the Camp facilities to the south side of the river, it would be preferable to keep the facilities such as the generator within the location of the current Brooks Camp footprint. The EA should be revised to consider the option of retaining the generators within the current camp complex, and possibly designing them such that they could be moved to a new location when the rest of the facilities move to the Beaver Pond.

**Response 14, NPS:** The NPS agrees that it is premature to relocate generators from Brooks Camp. The selected action is to relocate generators from Lake Brooks but not from Brooks Camp. The selected action also is to develop a conceptual design for relocation of additional facilities, especially from Brooks Camp, but this design has not been started and its implementation would require more analysis and public involvement.

**Comment 15, PI5:** It is inappropriate to construct the new duplexes at the maintenance facility at this time. A 2006 EA, *Rehabilitation and Replacement of Brooks Camp Facilities*, proposes the construction of new duplexes in Brooks Camp complex. It is not made clear in the



Maintenance Facility EA why the duplexes proposed to be constructed should be placed at the maintenance facility rather than being constructed as temporary structures within the Brooks Camp location.

**Response 15, NPS:** The NPS should have clearly explained in the EA that it modifies the 2006 decision from a previous EA. The duplexes will be constructed at the new site near the maintenance facilities off the Valley of Ten Thousand Smokes road and not at Brooks Camp. This decision follows the DCP direction more closely to relocate facilities to the south side of the river. See errata 2 below.

**Comment 16, PI5:** The presence of employees in Brooks Camp is valuable for visitor safety, even when they are not on duty. Staff living near the maintenance facilities would spend some time with staff still located at Brooks Camp. This would result in more traffic at night, either walking on the proposed trail or bicycling along the current valley road. Neither of these is particularly safe, given the number of bears that use the road and would likely use the new trail in the area between the road and the river.

**Response 16, NPS:** The NPS recognizes the difficulties in a phased move of facilities and functions from Brooks Camp, but when working with available funding and construction cycles some phasing is necessary. The Brooks Camp cannot be moved all at once, but the DCP calls for its eventual move, as this can be accomplished. Note that the only new trail in the selected action is a staff access trail between the maintenance facility and the Lake Brooks area, on top of the buried power line.

**Comment 17, PI7:** The proposed location falls outside of the area identified in the DCP. Two of the original reasons for leaving the current locations were to remove facilities and infrastructure from the river corridor for bears and cultural resource protection. Moving the facilities to the “Y” does little to improve these resources. You will be doubling the size of the human footprint in the river corridor/Archeological District. Nearly all of the original concerns will still exist.

**Response 17, NPS:** Regarding locations of facilities identified in the DCP, please see response 3 above. The new facility construction would likely result in no direct impacts to cultural resources. The site is located near the edge of the National Historic Landmark boundary in an area that archeologists have field surveyed and determined to have no adverse effects to cultural resources. The number of housing units will remain the same, not increase. The proposed two duplexes would have four bedrooms each and house eight employees; the same total number of occupants as the four existing tent frames. The new maintenance facility will consolidate functions currently scattered in six buildings into one facility in one maintenance yard. By relocating some employee housing to the south side and consolidating maintenance functions south of the river, the overall number of bear/human conflicts are expected to decrease over time, as envisioned in the DCP.

**Comment 18, PI8:** Aesthetic appeal is an issue as the view from Dumpling Mountain would be affected by a four-acre impact.

**Response 18, NPS:** During 2007, a July view from atop Dumpling Mountain shows large areas of dead or dying white spruce trees caused by a spruce bark beetle infestation throughout the Naknek Lake region. These areas are included in a 2006 forest health condition study by the US Forest Service, with annual aerial monitoring of the region. Aircraft passengers and hikers see

large gray and red swaths of dead/dying trees, among dark green areas of live spruce forest. It is subjective whether one rectangular, four-acre clearcut forest for this project would make much difference in the visual landscape from an aerial vantage point, given the damage caused by natural processes (e.g., insect infestations, windblown trees) and the large, current developed parcels within the Brooks Camp Developed Area. Further, the angled view from atop Dumphling Mountain would reduce the noticeable area of the visual impact.

**Comment 19, PI8:** The NPS should consider using a previously impacted site like Squirrel Camp to locate the new maintenance facility.

**Response 19, NPS:** Squirrel Camp, a previously developed, overflow camping area along the Valley of Ten Thousand Smokes road, is needed to house contractor crews associated with pending projects such as Moraine Pit gravel crushing and Valley of Ten Thousand Smokes road rehabilitation, as well as this project and future DCP implementation projects. The proposed maintenance facility area requires 50,000 square feet. Squirrel Camp, built on a former gravel pit used during the 1997 rehabilitation of the Valley of Ten Thousand Smokes road, is approximately 11,700 square feet or less than one-fourth the required size. Expansion of Squirrel Camp for the maintenance facility is not feasible, since it would require excavation of steep slopes on all sides to achieve a level terrain, extensive Section 106 archeological clearance and resolution of substantial engineering problems related to utility placement and operation.

**Comment 20, PI10:** Housing for park and lodge staff should be the last buildings to move up the Valley of Ten Thousand Smokes road. To do otherwise would result in even more people/bear jams at the bridge. The bridge is the only bear viewing area in the fall. Further concentrating human activity in the area of the bridge will further degrade the visitor experience.

**Response 20, NPS:** Regarding new facility locations and the DCP intent, refer to response 3. Since the DCP was completed, funding has been made available according to urgent needs related to life/health/safety concerns. Employee housing and maintenance working conditions have deteriorated to such a strong degree as to qualify for funding with this project. This project would substantially reduce the life/health/safety risks faced by park and concessions employees, as well as enhance maintenance activities to support Brooks Camp visitor use. The park will phase in the use of the new housing units and arrange housing assignments in an optimal way so as to avoid, as much as possible, people/bear jams at the bridge. Response 5 provides further explanation.

**Comment 21, PI11:** The maintenance facility site has already been surveyed, giving the appearance that this project has already begun and that this EA is just for show.

**Response 21, NPS:** The general area of the proposed maintenance facility site was flagged during the summer of 2006 to delineate an area to be tested for soils, archeological and wetlands resources. These resource evaluations were necessary to properly describe current conditions and thoroughly analyze environmental impacts within the EA. Implementation of this project will not begin until a FONSI has been approved.

**Comment 22, AK:** A solid waste authorization from the State may be required if demolition or construction waste is buried on-site.

**Response 22, NPS:** The NPS will require all demolition or construction waste to be removed from the Brooks River area to King Salmon. No debris will be buried at the Brooks River area.

**Comment 23, AK:** The operation of a remote camp for housing temporary and seasonal staff, either during or after construction is complete, also requires an authorization from ADEC.

**Response 23, NPS:** Contractors and NPS staff involved in the project construction will stay in tent frames at Squirrel Camp (located ½ mile east of the project site) and Lake Brooks existing employee residences. Garbage is hauled out to King Salmon. Fresh water is hauled in from existing, approved sources at Brooks Camp or Lake Brooks. Waste water is handled in a small septic system consisting of a tank and a leach field. This septic system is currently undergoing NPS and Alaska Department of Environmental Conservation review to assure State approval before the 2009 construction year.

**Comment 24, NPCA:** The EA lacks alternatives. Two alternatives do not fulfill the intent of NEPA to provide for a full range of alternatives. Notable is the absence of an alternative for the maintenance facility location identified in the 1996 DCP/EIS. The pros and cons of both locations should be presented.

**Response 24, NPS:** During internal scoping of the project EA, the NPS considered developing a second action alternative for locating the replacement facilities at the site indicated in the DCP, however in discussion it was decided that the direction in the DCP was not so strict that the location could not be shifted to a nearby site. The DCP did not go into detail as to why the site was chosen, and its location was only noted once on a project map, and not in the text. The decision was made during scoping that the EA did not need to fully analyze the differences in the two locations. They are both separate from the lakes, the river, prime bear habitat, and the sensitive cultural sites. They are both along the Valley of Ten Thousand Smokes road and out of public view. The selected site serves park management better than the more distant location because it is closer to existing facilities, housing and functions that will not be removed at Lake Brooks, and the power line running from the new maintenance facility to the Lake Brooks area will be shorter.

**Comment 25, NPCA:** Consider all actions possible in the next 3-5 years (such as reconstruction of the floating bridge, moving additional housing and administrative buildings, and possibly the campground) and review and single plan for them comprehensively.

**Response 25, NPS:** This is beyond the scope of the EA. The DCP EIS was a comprehensive analysis of the area activities and facilities. This EA implements part of that DCP decision – the part that was able to receive 2009 construction funding. The EA does not attempt to do this comprehensive analysis again. Environmental compliance planning funds and schedules do not allow a new comprehensive EIS for each funded implementation phase. The EA considered reasonably foreseeable future actions, but did not consider such speculative projects as a reconstructed floating bridge. As a general rule, an EA will not address speculative future actions unless they have been proposed or a funding request has been filed.

**Comment 26, SC:** The Brooks River area should be managed for day use with all major visitor and NPS administrative facilities relocated to the King Salmon area.

**Response 26, NPS:** The day use alternative is beyond the scope of this EA. It was analyzed during the DCP EIS and the decision was made to reject the day use alternative.

**Comment 27, SC:** Please estimate the cost of the proposed southside complex.

**Response 27, NPS:** The third part of the EA is to develop a conceptual design for future employee housing and other administrative facilities near the new maintenance facility site. The EA does not propose specific construction. It commits to future environmental analysis when there is a plan to analyze. Without a design concept, there is no cost estimate to include in the EA.

## **ERRATA**

This errata section provides clarifications, modifications or additional information to the EA and to the selected alternative, Alternative 2. These amendments do not significantly change the analysis of the EA and, therefore a new or revised EA is not needed and will not be produced.

### 1. Correction

The geographical place name *Brooks Lake* is corrected to *Lake Brooks*.

### 2. Modification

A decision on duplex housing location is changed from the *2006 Rehabilitation and Replacement of Brooks Camp Facilities EA/FONSI*.

The selected alternative in the 2006 EA included the replacement of the four wall tents with two duplex units to be constructed in the same Brooks Camp location. At that time, the purpose was to replace substandard housing with new housing that could eventually be moved from Brooks Camp to the south side of the river when DCP implementation funding became available.

However, during the Lake Brooks Maintenance Facility EA scoping process, the NPS decided to change its 2006 decision by building the duplexes on the south side, thereby eliminating the need to move them in a future year. The purpose and need for the housing replacement project is still valid and is further detailed in the 2006 EA on page 8. However, the 2007 EA decision to build them on the south side provides a more cost effective and efficient approach to implementing some DCP housing location changes. The NPS acknowledges that this explanation for the management decision change should have been included in the 2007 EA in sections 1.2.4 *Planning and NEPA History of the Project* and 2.3 *Alternative 2: Proposed Action*.

### 3. Update and Correction

Section 2.3 (1) on page 14 of the EA is updated so that clearing of trees (first bullet) would be done in fall, not summer, of 2007.

### 4. Clarification

The first two sentences of EA Section 2.4.3 (page 16), *Wildlife*, is clarified to explain that the NPS may, unavoidably, need to perform some construction tasks during periods of high bear activity:

*It is expected that construction tasks would occur throughout the summer and thus, sometimes coincide with periods of high bear activity. However, to the greatest practical extent, many tasks would be scheduled during periods of low bear use (i.e., spring, August, etc.) to minimize both direct and indirect interactions with bears. Similarly, as much as possible, supplies and*

*equipment would be staged in the vicinity of work areas during periods of low bear use to minimize bear and human interactions.*

Similarly, the first sentence of EA Section 2.4.6 (page 17), *Natural Sounds*, is clarified:

*It is expected that construction tasks would occur throughout the summer. However, to the greatest practical extent, construction and operation actions would not interfere with the natural sounds of the areas (i.e., bird calls and rustling leaves).*

#### 5. Update

Section 2.4.4 of the EA (page 16), *Mitigation*, is updated:

***Cultural Resources:*** *To ensure that each project component complies with Section 106 of the National Historic Preservation Act (NHPA), archaeological investigations have been completed for the project site. Archeologists surveyed the new road and buried power line path. No cultural resources have been located and the SHPO concurred with the NPS determination that shallow-burying the electric line in conduit across XMK-008 at Lake Brooks would constitute “No Adverse Effect” to archeological resources.*

#### 6. Correction.

On EA page 17, *NPS Cultural Management Guidelines* is corrected to *NPS Collections Management Guidelines*.

#### 7. Correction and Clarification

Figure 7 of the EA has been changed to accurately depict Lake Brooks structures to be removed and is attached below.

At Lake Brooks, the Mechanics Shop, Fuel Tanks, Fueling Stand, Propane Storage, Generators, Bat Shed, Carpenter Shop, Plywood Storage Shed, and Generator Building will be removed. Demolition of any historic structures will be preceded by full cultural investigation according to Section 106 of the NHPA and NPS Management Policies (2006). The Park Cultural Resources team will conduct the Section 106 process in accordance with State and federal protocols under the NHPA and other cultural resources laws, regulations and guidance. The historic BL-3 log building currently used for employee housing will not be removed.

Revised Figure 7. Lake Brooks Structures to be Removed

