

National Park Service
U.S. Department of the Interior
Glacier National Park
Montana



Finding of No Significant Impact

Roberts Cabin Removal

October 2007

**FINDING OF NO SIGNIFICANT IMPACT
ROBERTS CABIN REMOVAL
GLACIER NATIONAL PARK
WEST GLACIER, MONTANA**

Edna Graham purchased the lot in Glacier Park Villa Sites on which the Roberts Cabin is located in 1949 and she constructed the cabin shortly thereafter. The cabin sits on the shore of Lake McDonald in Glacier National Park. Mary Agnes Roberts, Graham's daughter, sold the property to the National Park Service (NPS) in 1975, and received a 25-year lease agreement to permit use of the cabin by the family. The cabin was used seasonally by Mary Agnes Roberts' family under this 25-year lease until 2000 when the lease expired. Ms. Roberts sold the property to the federal government with a verbal understanding with then Superintendent Phil Iverson, that the building would be removed and the property restored to its natural state at the end of the 25-year lease. NPS policy at the time of acquisition was to remove non-historic structures in unique natural areas and restore these sites to a natural state. This policy was the justification for the cabin's acquisition in 1975. A determination of eligibility for listing in the National Register of Historic Places was completed in 2006. The Montana State Historic Preservation Office concurred in the park's recent determination that the cabin met the criteria for listing in the National Register of Historic Places as a building contributing to the significance of the Glacier Park Villa Sites Historic District.

In 2003, the park proposed that the building be demolished. At the time of the cabin's acquisition in 1975, the c. 1949 building fell well outside the National Register of Historic Places general rule, that properties must be at least 50 years before nomination. The NPS did not require the Roberts family to maintain the building during their lease as the NPS planned to eventually remove the building. The cabin is currently in poor condition and presents a human health and safety concern. Removal of the cabin would restore the natural state of the property, decrease development along the Lake McDonald shoreline, remove human health and safety concerns, and honor the verbal agreement between the park and the previous landowner. Resource topics analyzed in the Environmental Assessment/ Assessment of Effect (EA/AEF) were historic structures, cultural landscapes, soils, vegetation, wildlife, threatened and endangered species, human health and safety, and visitor use and experience.

PREFERRED ALTERNATIVE

The Roberts Cabin will be removed from the lakeshore of Lake McDonald. All peripheral evidence of the cabin will be removed including electrical wires, gas lines, propane tank, rock lined walkways, cement blocks, retaining walls, and non-natural materials. If appropriate, materials that are salvageable will be re-used in the park or offered for sale by government auction. The site will then be returned to its natural state using native plants and materials.

Park crews will take up to four weeks to remove the cabin. The cabin will be removed in the fall to reduce impacts on visitors and wildlife. The road to the Roberts Cabin will be temporarily closed during the removal operation. The existing road is sufficient to stage removal equipment, dumpsters, and dump trucks. The two retaining walls behind the cabin will be removed and the slope will be recontoured with an excavator. This disturbed area will provide access for the excavator, which will begin removal at the back of the cabin and work towards the front of the cabin. Access to demolish the building will be from the parking area that is northeast of the building and outside the building perimeter. All building material and associated remains will be

removed and taken to an appropriate landfill. Hazardous materials will be disposed of in accordance with federal and state laws.

Four dead trees located close to the cabin will be removed to provide better access to the structure and to provide a safe environment for removal crews. Four maple tree clumps will be cut back for access and left in place to sprout after the recontouring of the slope. After cabin removal, the park's revegetation staff will revegetate the site and return the disturbed area to a natural state. The area will be surveyed for non-native plant species prior to disturbance and these populations will be treated according to species and abundance requirements. Following cabin removal and revegetation, a second treatment will be implemented if necessary. Removal of the concrete retaining walls and access to the cabin with equipment will result in soil disturbance. Topsoil will be removed and stockpiled prior to implementation of this work and the compacted area will be scarified prior to restoration of the salvaged topsoil after cabin removal is complete. Utility line removal areas will be filled in and returned to a natural slope. Seed and native plant cuttings will be collected from the site and planted. The soil will be assessed and organic material will be used to augment the soil for needed nutrients. Larger shrubs and trees will be planted to naturally screen the site and make it visually blend into the rest of the lakeshore. The site will be signed to reduce disturbance of the site while native plants become established. The revegetation staff will monitor the site for non-native plant removal and native plant success.

Best Management Practices (BMP's- EA/EMF Appendix A) have been developed for Glacier National Park. These mitigation practices will be used in the cabin removal and site restoration actions. A comprehensive risk management plan will be developed to reduce the risk of rodent-borne disease and other safety hazards present during cabin removal.

Section 106 of the National Historic Preservation Act of 1966, as amended, requires that the park consult with the Montana State Historic Preservation Office (SHPO) to seek ways to avoid, minimize or mitigate the adverse effect. The park has signed a Memorandum of Agreement with the SHPO to mitigate the adverse effect by completing the following stipulations:

- The park will document the cabin to the standards of the Historic American Building Survey. The documentation would be placed in the park archives, and other repositories as required.
- The historic Ewing (currently used by the Artist-in-Residence Program cabin) will be painted and deteriorated rotting sill logs replaced.
- An interpretive wayside exhibit highlighting Lake McDonald recreational cabins and their historic importance to Glacier will be erected in a visitor use location on the lake as off-site mitigation.

Glacier National Park also notified the Advisory Council on Historic Preservation of the adverse effect. The Council chose not to participate in the consultation process.

If previously undiscovered archeological resources are discovered during construction, all work in the immediate vicinity of the discovery will be halted until the resources can be identified and documented and an appropriate mitigation strategy developed in consultation with the State Historic Preservation Officer.

OTHER ALTERNATIVES CONSIDERED

A No Action Alternative was considered as required by the National Environmental Policy Act of 1969 (NEPA). The No Action includes removal of the deck, which is rotting and has become a safety hazard.

Rehabilitation of the building for future use was rejected because the cost of the rehabilitation is more than the structure is worth. The building is not a priority in serving the park's mission and the condition of the building is poor. The combination of these factors results in a value that recommends disposal. Furthermore, the cabin was purchased by the NPS to be removed from the lakeshore.

Removal of the cabin in a structural fire training exercise was considered as an alternative. Park staff raised concern that the cabin may contain hazardous materials such as lead paint or asbestos. The hazardous material safety issues prompted the management staff to reject this alternative.

Removal of the cabin by salvage contract was considered as an alternative. The park has work crews who are able to complete the cabin removal this fall. In the interest of time, removal by park crews was deemed the most efficient.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The environmentally preferred alternative is determined by applying the criteria suggested in the National Environmental Policy Act of 1969 (NEPA) which is guided by the Council on Environmental Quality (CEQ). According to CEQ, the "environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in NEPA Section 101":

- Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
- Assure for all generations safe, healthful, productive, and esthetically and culturally pleasing surroundings;
- Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
- Preserve important historic, cultural and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;
- Achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life" amenities; and
- Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

The preferred alternative is also the environmentally preferred alternative as it best fulfills the above criteria. The Preferred Alternative decreases development and improves natural lakeshore and mountain views for visitors and for succeeding generations (Criteria 1). Safety and health concerns with the cabin will be eliminated and the site restored to its natural state providing safe, healthful, productive, and aesthetically pleasing surroundings (Criteria 2, 3). The funds that will be spent on removing the deck and exterior safety hazards will be used to maintain the adjacent, historic Artist in Residence cabin improving the aesthetics and cultural surroundings of another historic lakeshore cabin (Criteria 2). Removal of the Roberts Cabin will achieve the widest range of beneficial uses of the environment by increasing lakeshore wildlife habitat and removing development from the lakeshore (Criteria 3). The preferred alternative does not meet Criteria 4 as it removes an historic structure and adversely impacts a cultural resource. An interpretive exhibit about recreational cabins on Lake McDonald will provide mitigation for the removal of an historic structure and interpret recreational cabins to the visiting public so they will better understand the importance and context of historic private

properties in Glacier (Criteria 4). The Preferred Alternative achieves a balance between population and resource use or permits high standards of living as human development is being removed from the lakeshore and the site will be returned to its natural state (Criteria 5). Parts of the Roberts Cabin will be salvaged for use in other park construction projects and areas, while this action will achieve some recycling of depletable resources, it does not achieve the maximum recycling of these resources (Criteria 6). While this project has an adverse impact on an historic structure and the surrounding historic districts, it fulfills a verbal agreement made with the landowner and removes development along the lakeshore and returns the area to its natural state.

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

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

Impacts that may be both beneficial and adverse.

The Preferred Alternative will have long-term adverse impacts on a historic building that has been defined as a contributing element of the Glacier Park Villa Sites and Lake McDonald Lodge Historic Districts. The cultural landscape in these districts will be adversely impacted by removal of the Roberts Cabin. Painting and structure repair of the Artist-In-Residence building adjacent to the Roberts Cabin site will have a beneficial impact on that historic building and the cultural landscape. Interpretive media that tells the story of recreational cabins along the shore of Lake McDonald will be beneficial to visitors and will mitigate the adverse impacts of cabin removal. Visitor use and experience will be adversely impacted temporarily by the closure of the access road to the cabin during demolition. Visitors may be impacted either adversely or beneficially by the cabin removal. Some visitors may like to look at historic buildings and may consider their experience is adversely impacted if they cannot view the historic cabin. While, other visitors may consider the cabin as an eyesore and may consider their experience beneficially impacted if development is removed from the lakeshore and the site is returned to its natural state.

Short-term adverse impacts to soils will occur with the recontouring of the cabin site. Cabin removal will have a minor, short-term adverse impact on wildlife, bald eagles, and other sensitive species during the actual demolition. The long-term impact on wildlife species, soils, and vegetation is beneficial with natural site restoration after the cabin is removed. The demolition of the cabin will remove current and future safety hazards with deterioration of the building. Public safety is beneficially impacted.

Degree of effect on public health or safety.

Several safety concerns have been identified at the site of the Roberts Cabin. The stairs and deck have begun to rot and the boards are soft and spongy. Members of the public could sustain serious injury by falling through the deck or stairs. Rodents have access to the building and years of rodent dropping accumulations present the safety concern of air-borne diseases such as Hantavirus. The deterioration of the building over time presents inherent safety risks such as building materials collapsing. Furthermore, hazardous materials such as asbestos and lead paint have not been identified and may be present. The deteriorating building may attract curious children or adult visitors who are at risk of exposure to rodent-borne diseases, hazardous materials, or injury from unsafe conditions. Once the cabin is removed, there will not be a public safety hazard present at the cabin site. Park employees responsible for cabin removal will be required to follow an approved risk management plan for working with rodent-borne diseases, unknown hazardous materials, and hazards of building removal.

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 Roberts Cabin contributes to the significance of the Glacier Park Villa Sites Historic District. The Historic District is eligible for listing in the National Register of Historic Places as a representative example of recreational camp development on Lake McDonald in Glacier National Park. The Lake McDonald Historic District was listed in the National Register of Historic Places in 1978. In 1996, the Lake McDonald Lodge Historic District National Register Nomination Form was amended, to among other things, expand the boundary to include the Ewing [Artists-in-Residence] Cabin (1105) and the Hunter [Boatman's] Cabin (1106). The nomination states, "They contribute to our understanding of private recreational development along Lake McDonald --- a pattern of development critical to the growth of the Lake McDonald Lodge district. They are also excellent examples of Glacier rustic architecture as developed outside the purview of the NPS Landscape Division." The Roberts Cabin is adjacent to the Hunter and Artist-in-Residence Cabins. The cabin lies on the Lake McDonald shoreline, but is not associated with prime farmlands, wetlands, wild and scenic rivers, or other ecologically critical areas.

Degree to which effects on the quality of the human environment are likely to be highly controversial.

No aspects of this project are expected to be highly controversial.

Degree to which effects on the quality of the human environment is highly uncertain or involves unique or unknown risks.

There are no uncertain or unknown impacts on the human environment from the proposed project.

Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.

The action may be viewed by some people as establishing a precedent or representing a decision in principle about a future consideration for the removal of other historic properties around Lake McDonald. However, it does not. Long term leases and life estates will be terminating on a number of cabins around Lake McDonald in the next decade and the park will have to make a decision about the future of each property. It is anticipated that the park will begin a revision of the 1985 Land Protection Plan and it should address disposition of historic properties, however it will do so on an individual basis. An accompanying environmental analysis will be prepared for each property. The Roberts cabin will be removed to honor the verbal agreement with the previous landowner upon acquisition. At the time of the cabin's acquisition in 1975, the c. 1949 building fell well outside the National Register of Historic Places general rule, that properties must be at least 50 years before nomination. The NPS did not require the Roberts family to maintain the building at the end of their lease as the NPS planned to remove the building. The cabin is currently in poor condition and presents a human health and safety concern. Glacier National Park remains committed to preserving historic resources and maintaining cultural landscapes.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.

The action does not significantly add to cumulative impacts from other actions.

Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.

Physical destruction of a property is one example of an adverse effect defined in 36 CFR 800.5. The cabin removal will result in a moderate, long-term, adverse impact to the Glacier Park Villa Sites Historic District. Under Section 106, GNP has reached a determination of adverse effect.

The loss of the building will impact the cultural landscape characteristics of the Glacier Park Villa Sites Historic District, the Lake McDonald Historic District, and the other recreational camps on Lake McDonald. Most specifically, the loss of the cabin, which sets between two other cabins, will reduce the characteristic of cabin groupings. The result of the alternative on cultural landscapes will be **minor, long-term, site-specific, and adverse.**

Section 106 consultation in accordance with the National Historic Preservation Act has been completed. The State Historic Preservation Officer reviewed the project on-site March 14, 2007 and all concerns have been addressed. The park signed a Memorandum of Agreement with the SHPO on October 1, 2007 to mitigate the adverse effect by completing the following stipulations: cabin maintenance on an adjacent historic structure, development of interpretive media, and completion of Historic American Buildings Survey (HABS) documentation of the cabin for park archives.

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

Glacier National Park provides habitat for four threatened and endangered species—gray wolf, grizzly bear, bull trout, and Canada lynx—and one candidate species, slender moonwort. There is no evidence of recent wolf activity in the area and the area is not considered primary wolf habitat because there is a limited prey base for wolves. There are currently no known den or rendezvous sites near the project area. A preliminary map of lynx habitat in the park defined moist conifer forest above 4,000 feet elevation as the most likely areas supporting lynx. The project site is not above 4,000 feet elevation, suggesting that the project area may not provide suitable lynx habitat. Glacier National Park was placed into grizzly bear management “situations” in accordance with the Grizzly Bear Recovery Plan (USFWS 1993). Over 1 million acres of the park (proposed wilderness) are established as Management Situation 1, in which management decisions would favor the needs of the grizzly bear when grizzly habitat and other land-use values compete, and grizzly-human conflicts would be resolved in favor of grizzlies, unless a bear is determined to be a nuisance. The remainder of the park, which is developed front-country, is established as Management Situation 3, in which grizzly habitat maintenance and improvement are not the highest management considerations, grizzly bear presence would be actively discouraged, and any grizzly involved in a grizzly-human conflict would be controlled. The project location is within Management Situation 3. Grizzly bears are discouraged from using the Lake McDonald Lodge developed area and consequently are usually not observed in the area. Bull trout are located within Lake McDonald and spawn in Lower McDonald Creek. Furthermore, gray wolves, Canada lynx, and grizzly bears are expected to avoid development and human activity along Lake McDonald. The proposed demolition is not expected to impact bull trout or their habitat as the work would occur above the waterline. Slender moonwort has not been found in or near the project area. No effects to federally threatened or endangered species are expected from the project and compliance with Section 7 of the Endangered Species Act is completed.

Whether the action threatens a violation of federal, state, or local environmental protection law.

The action does not threaten a violation of any federal, state, or local regulations.

IMPAIRMENT

In addition to reviewing the list of significance criteria, the National Park Service has determined that implementation of the proposal will not constitute an impairment to Glacier National Park's resources and values. This conclusion is based on a thorough analysis of the environmental impacts described in the *Roberts Cabin Removal Environmental Assessment*, the public comments received, and the professional judgment of the decision maker guided by the direction in *NPS Management Policies* (2006). Although the project has adverse impacts on an historic structure and cultural landscapes, they are outweighed by beneficial impacts to an adjacent historic cabin, wildlife, vegetation, soils, health and safety, and the visitor experience.

PUBLIC INVOLVEMENT

The initial public scoping for this project included the removal of two other cabins in addition to the Roberts Cabin. Public scoping began with a press release and a mailed scoping letter on June 18, 2003. Scoping letters were sent to people on the park's environmental assessment mailing list. The mailing list included members of the public along with federal, state and tribal agencies. The scoping letter was also placed on Glacier's Internet site. The initial scoping period was completed July 17, 2003. Another scoping period was opened November 29, 2006 because two and a half years had passed since the first scoping period and the scope of the project had changed to the removal of only the Roberts Cabin. The second scoping period included an updated press release and a scoping letter. The second scoping period ended on December 29, 2006. This scoping effort was listed on the NPS public comment website.

In accordance with 36 CFR800.8(c), Glacier National Park also notified the Montana State Historic Preservation Office (SHPO) and the Advisory Council on Historic Preservation (Council) that it intended to prepare a combined Environmental Assessment/Finding of Effect (EA/AEF) for the proposed project.

Nine letters were received during the initial scoping. Five letters supported the removal of the Roberts cabin, one letter was in opposition to the Robert cabin removal, and one letter stated that it was premature to consider removal of the cabin without a DOE. The State Historic Preservation Office wrote acknowledging the beginning of consultation. One letter was received from a private business interested in removing the cabin.

The park received fifteen letters during the second scoping period. Ten of those letters were in support of the Roberts Cabin removal. One letter was in opposition to the cabin removal. The Blackfeet Tribe and the Backcountry Horseman of the Flathead both wrote saying they had no comments. One letter stated several issues that they would like to see addressed in the EA including the status of the National Register of Historic Places Multiple Property Documentation, the umbrella strategy that will drive the NPS disposition of lakeshore cabins, description of the Roberts Cabin preservation in the No Action alternative, mitigation of safety hazards, and a description of the cabins that are more representative of the Glacier Park Villa Sites subdivision than the Roberts Cabin. These comments are all addressed in the EA/AEF. At this time, it is anticipated that one plan and environmental analysis will address the remaining Lake McDonald cabins. Circumstances or events may result in individual EA or EIS preparation for individual properties. One comment requested more information about the sale of the building for relocation. No public meetings were held for this project.

Nine letters were received on the EA/AEF. The public comment period on the document was from July 17, 2007 to August 17, 2007. Eight letters stated support of the cabin removal and rehabilitation of the site to its natural state. One letter was against the cabin removal and suggested that the historic building be maintained and opened for visitors to tour. The Roberts Cabin is not in a location that visitors frequent and the adjacent cabin is used for a residence during the summer season and visitor traffic may disturb the inhabitants. Furthermore, the cost of rehabilitation and maintenance of the structure is prohibitively expensive.

A press release will be issued announcing the availability of the FONSI. A copy will be sent to all people who commented and placed on the NPS public web site.

CONCLUSION

The proposal does not constitute an action that normally requires preparation of an environmental impact statement (EIS). The proposal will not have a significant effect on the human environment. Unmitigated negative environmental impacts that could occur are minor or less in degree. There are no unmitigated adverse impacts on public health or public safety. No highly uncertain or controversial impacts, unique or unknown risks, or cumulative effects were identified. The action does not establish a precedent or represent a decision in principle about a future consideration. The park has determined that proposed cabin removal will have an adverse effect on the Roberts Cabin, Glacier Park Villa Sites Historic District and the Lake McDonald Lodge Historic District. The State Historic Preservation Officer (SHPO) has worked with the park in identifying mitigation to reduce the adverse effect. The NPS has documented the cabin to the standards of the Historic American Building Survey (HABS). The HABS documentation will be placed in the park archives, and other repositories as required. The adjacent Artist-in-Residence cabin will be painted and have rotting sill logs replaced. An interpretive exhibit will be located off-site for education about historic lakeshore cabins. Section 106 consultation in accordance with the National Historic Preservation Act has been completed. The SHPO reviewed the project and all concerns have been addressed. No effects to federally threatened or endangered species are expected from the project and compliance with Section 7 of the Endangered Species Act is completed. Implementation of the action will not violate any federal, state, or local environmental protection laws.

The action will not result in major, adverse impacts to a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation and proclamation of Glacier National Park; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the park's general management plan or other relevant National Park Service planning documents, there will be no impairment of the park's resources or values.

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

Recommended: Michael O. Holm 10-22-07
Michael O. Holm Date
Superintendent, Glacier National Park

Approved: Anthony J. Schetzle 10-24-07
Michael B. Snyder Date
Director, Intermountain Region