



**FINDING OF NO SIGNIFICANT IMPACT
CONSTRUCT CURATORIAL STORAGE FACILITY FOR LARGE OBJECTS
DELAWARE WATER GAP NATIONAL RECREATION AREA, PENNSYLVANIA**

INTRODUCTION

The Delaware Water Gap National Recreation Area encompasses 40 miles of the Middle Delaware National Scenic and Recreational River and approximately 68,000 acres of surrounding land in both Pennsylvania and New Jersey. The park contains an extraordinary environment of geologic and natural features as well as a significant concentration of cultural resources, spanning 12,000 years of human habitation. The curatorial storage facility is needed because the facilities in which large objects, such as wagons and furniture, are presently stored are substandard and inadequate for proper inventory, upkeep, and research purposes.

The NPS completed an environmental assessment (EA) that provides an analysis of the environmental consequences of the alternatives considered for construction of a curatorial storage facility for large objects. The EA was prepared in accordance with National Environmental Policy Act of 1969, as amended (NEPA), its implementing regulations by the Council on Environmental Quality (40 CFR 1500-1508), and Director's Order #12, Conservation Planning, Environmental Impact Analysis and Decision-Making, and accompanying Handbook (DO-12).

This document records a Finding of No Significant Impact as required by NEPA and a determination of no impairment as required by the NPS Organic Act of 1916.

SELECTED ALTERNATIVE

Based on the analysis presented in the EA, the NPS has selected Alternative B, Construct Curatorial Storage Facility for Large Objects, for implementation. This alternative was described as the Preferred Alternative on pages 12-14 of the EA. The selected alternative calls for the construction of an approximately 2,000 square foot auxiliary curatorial facility adjacent to the current facility which houses small archives and office space for park cultural resource staff. The auxiliary storage facility will be a pre-fabricated steel structure and would provide a centralized location meeting regulations for storage of museum objects for the entire museum collection of the park and provide sufficient storage space for the collection of large objects. The new structure would be constructed on a previously disturbed area, currently a parking area. The structure would be constructed on concrete slab foundation and would require a minimal area of grading to provide an appropriate area for the structure. The building will be constructed to seek Leadership in Energy and Environmental Design (LEED) certification through the U.S. Green Building Council. The new facility will also be equipped with climate controls to reduce artifact deterioration, fire detection/suppression system, and an intrusion alarm.

Following construction of the museum storage facility, the objects will be relocated to the new building, where park staff will inventory, examine, clean, and restore the collection, as needed. The facility would ensure large artifact items are preserved in a climate controlled, secure

environment. The selected alternative would provide easy access of the collection to park staff responsible for maintaining the objects and provide access for scientific research.

OTHER ALTERNATIVES CONSIDERED

The environmental assessment prepared for this project also analyzed the no action alternative (Alternative A). Under the no action alternative, the NPS would continue present management operations. Current management of the storage and large objects does not provide for compliance with 36 CFR Part 79, Curation of Federally-owned and Administered Archeological Collections. The structures in which the large objects are currently stored were selected based on the amount of space that was readily available; however, the structures have never met the requirements for storage of the objects and would be difficult to rehabilitate and retrofit to meet the requirements. Cyclical maintenance on the structures is performed to extend the useful life and is accomplished as funding allows. When funding is not available, cyclic maintenance backlogs occur and serious repairs take precedence over maintenance. Work is typically accomplished using full-time and seasonal park employees. Several partner groups augment the park work force in maintaining several historic structures, including those at Millbrook Village, which the groups are under agreement to utilize. Curation of the objects is difficult because the collection is dispersed and the current structures used for storage do not provide adequate workspace; therefore, proper upkeep of the collection objects is often deferred. Research can technically be accomplished but not readily. The park strives to keep the structures secured against the elements, vandalism, and rodents. However, the No Action alternative does not meet the goals and objectives of the project.

The EA also identified other alternatives or options that were initially considered but then dismissed from further analysis.

Construct an addition onto Bushkill School - This alternative would construct a 55' x 40' addition to the current museum facility to accommodate the large objects currently dispersed in several buildings. Although the Bushkill School is a structurally sound building, it would be more costly and difficult to construct an appropriate addition to house the objects. The Bushkill School is historic; however, it was determined to be not eligible for the National Register of Historic Structures. Although it is not eligible, constructing an addition would still necessitate complimentary materials and architecture. Because this alternative would be more costly, it was dismissed from further analysis.

Move large objects to other park buildings - This alternative would move the large objects out of the locations where they are currently stored to more structurally stable buildings in the park. This alternative would not centralize the collection for preservation, and would also not provide significantly more security than current facilities provide unless retrofitted. Because this alternative would not fully meet the goals of centralizing and preserving the large objects, this alternative was dismissed from further analysis.

Construct a new building in another park administrative area - This alternative looked at options for constructing a new building for large objects near other administrative buildings. Options included the Bushkill Headquarters Complex, and Dingmans Maintenance Compound. Although these areas would be appropriate for a modern structure for administrative use, the Headquarters Complex is bound by areas of wetland and cannot be expanded. Without changing other uses, the complex could not accommodate a building of the size required. The Dingmans

Maintenance Complex is 10 miles north of the current Museum Storage Facility, and although a new storage building there would provide appropriate storage for the objects, it would not meet the goal of the centralizing the collection for inventory and preservation.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The NPS is required to identify the environmentally preferred alternative in its NEPA documents for public review and comment. The NPS, in accordance with the Department of the Interior policies contained in the Departmental Manual (516 DM 4.10) and the Council on Environmental Quality's (CEQ) *NEPA's Forty Most Asked Questions*, defines the environmentally preferred alternative (or alternatives) as the alternative that best promotes the national environmental policy expressed in NEPA (Section 101(b) (516 DM 4.10). In their *Forty Most Asked Questions*, CEQ further clarifies the identification of the environmentally preferred alternative, stating "Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources" (Q6a).

Alternative B has been identified as the environmentally Preferred Alternative because it best meets the purpose and need for action and best protects, preserves and enhances cultural resources. Alternative B provides proper storage and preservation of the museum collections for future generations and minimizes risk to collection in inadequate structures in poor condition. Alternative B minimally impacts the physical environment and utilizes building practices and energy efficiency techniques to attain Leadership in Energy and Environmental Design (LEED) certification through the U.S. Green Building Council.

Alternative A does not substantially change current management actions. Current storage of large objects of the collection is not in compliance with 36 CFR Part 79. This is due in large part to the lack of funding to maintain structures within the park; limited funding received is focused on eligible structures and those used for visitor services and maintenance on many other structures is deferred. Although Alternative A would not cause any impact to the physical environment, it does not protect, preserve, or enhance the historic and cultural resources.

MITIGATION MEASURES

The following standard mitigation measures would be implemented during construction of the proposed alternative, as needed:

- The park will prepare an erosion and sediment control plan using Best Management Practices which will be used during construction of the building.
- Construction zones would be identified and fenced appropriately and safety/protection measures will be clearly stated in construction specifications.
- To reduce noise and emissions, construction equipment will not be permitted to idle for long periods of time and to minimize possible petrochemical leaks from construction equipment, the contractor will regularly monitor and check construction equipment to identify and repair any leaks.
- The exterior treatment of the auxiliary curatorial storage facility (color, scale, etc.) will be sympathetic to the existing Bushkill School, so as to blend with the existing developed setting, and be similar to other park structures.

- Landscaping and re-vegetation of disturbed areas and areas immediately adjacent to the storage facility will take place following construction and will be monitored for invasive weeds. Existing trees at the site will be protected and not be disturbed.
- A cultural resources specialist will monitor initial ground-disturbing activities. In the event that archeological resources are discovered during construction, all work would cease until the resources are properly recorded by a qualified archeologist. If any resources are determined to be potentially eligible for the National Register of Historic Places, consultation with the appropriate historic preservation offices will be conducted to determine if either avoidance or mitigation is necessary. In the unlikely event that any human remains or funerary and sacred objects are unearthed during construction, the park, in compliance with the Native American Graves Protection and Repatriation Act (1990), would consult the appropriate tribal representatives in order to determine proper treatment.

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

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

1) Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts that require analysis in an EIS.

As described in the EA, several resources will experience both beneficial and adverse impacts during the implementation of the project; however, no significant impacts were identified that would require analysis in an Environmental Impact Statement.

2) The degree to which public health and safety are affected

NPS Management Policies 2006 require NPS to seek to provide a safe and healthful environment for visitors and employees. The selected alternative would provide a safe and healthful environment for park staff responsible for curation of large objects in the park in accordance with policy. There would be no adverse impact on health and safety to park visitors or staff.

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

The project area is within 0.5 mile of several historic structures; however, the project will have no impact on those resources. There are no prime farmlands, ecologically critical areas, wetlands, species of concern, sites sacred to American Indians, or other significant ethnographic resources occur within the vicinity of the project. The segment of the Delaware River nearest to the project is designated as a wild and scenic river; however, the project is located approximately 1 mile west of the Delaware River, separated by forested lands and on the opposite side of US 209. The potential for any adverse or beneficial impacts to the river's remarkably outstanding values as a result of implementing the selected action is very low and if occurred, would be of short-term and negligible intensity.

4) The degree to which impacts are likely to be highly controversial.

No highly controversial effects were identified during either preparation of the EA or the public comment period.

5) The degree to which the potential impacts are highly uncertain or involve unique or unknown risks.

No highly uncertain, unique or unknown risks were identified during either preparation of the EA or the public comment period.

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

The selected action neither establishes a NPS precedent for future actions with significant effects nor represents a decision in principle about a future consideration. Future actions as a result of implementation of the selected alternative involve the performance of curatorial duties as required by laws and regulations, specified in the EA.

7) Whether the action is related to other actions that may have individual insignificant impacts but cumulatively significant effects. Significance cannot be avoided by terming an action temporary or breaking it down into small component parts.

The selected action will not result in cumulatively significant effects; however, as described in the EA, there will be some cumulative impacts of short-term negligible impacts intensity, and beneficial, long-term impact on museum collections. Additionally, the project will result in short-term, minor to moderate, adverse impacts to park operations during construction of these projects, and long-term negligible to minor adverse impacts to management and operations.

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

Although several eligible structures are within approximately 0.5 mile of the project area, no historic properties in or eligible for listing in the National Register will be impacted. In June 1994, the Bushkill School was determined by the Keeper of the National Register of Historic Places as not eligible for listing because the school has not been demonstrated to be of historical or architectural importance; and the village which it served no longer retains integrity (see appendices.) No archeological resources are known and the area is formerly disturbed; however, archeological monitoring will take place during the implementation of the project. The selected action will have a beneficial, long-term effect to cultural resources, specifically, the large artifact collection, because the curatorial storage facility will provide adequate storage space with proper environmental controls, a security system, and fire detection system. Minor, adverse impacts may occur to certain items in the collection if they are damaged during relocation to the curatorial storage facility; however, mitigation measures, including the monitoring of transport activities by park staff, are designed to minimize potential damage to the collection. Following relocation of the large objects to the new building, park staff will inventory, examine, clean, and restore the collection, as needed. After applying the Advisory Council on Historic Preservation's criteria of adverse effects (*36 CFR Part 800.5 Assessment of Adverse Effects*), the NPS concludes that implementation of alternative B would have no effect on historic objects (non-accessioned and accessioned objects).

9) The degree to which an action may adversely affect an endangered or threatened species or its habitat.

An environmental review search of the Pennsylvania Natural Diversity Inventory (conducted 7 April 2008) resulted in a finding of no known resources in the project area, confirming the park's environmental screening results. The selected action will have no impact on threatened or endangered species or 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 action violates no federal, state, or local environmental protection laws. The project will be consistent with all applicable local, state, and federal regulations.

IMPAIRMENT OF PARK RESOURCES OR VALUES

The National Park Service Organic Act of 1916, and related laws, mandate that the units of the national park system must be managed in a way that leaves them “unimpaired for the enjoyment of future generations”. These laws give the NPS the management discretion to allow certain impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, so long as the impact does not constitute impairment of the affected resources and values. Director’s Order 12 states that environmental documents will evaluate and describe impacts that may constitute an impairment of park resources or values. In addition, the decision document will summarize impacts and whether or not such impacts may constitute an impairment of park resources or values. An impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

1. necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park,
2. key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
3. identified as a specific goal in the park’s general management plan or other relevant NPS planning documents.

The National Park Service has determined that implementation of the selected alternative will not constitute an impairment to Delaware Water Gap National Recreation Area resources and values. This conclusion is based on a thorough analysis of the environmental impacts described in the *Construct Curatorial Storage Facility for Large Objects Environmental Assessment / Assessment of Effect*, the public comment received, relevant scientific studies, and the professional judgment of the decision-maker guided by the direction in NPS Management Policies (2001). Although the selected alternative has some negative impacts, in all cases these adverse impacts are the result of actions taken to preserve and restore other park resources and values. Overall, the selected alternative results in benefits to park resources and values, opportunities for their enjoyment, and does not result in their impairment.

PUBLIC INVOLVEMENT

The *Construct Curatorial Storage Facility for Large Objects Environmental Assessment / Assessment of Effect* was released to the public on June 16, 2008 and was announced through a press release on the same date. The EA was made available for public review on the National Park Service’s Planning, Environment, and Public Comment (PEPC) website and hardcopies were available for review at park headquarters.

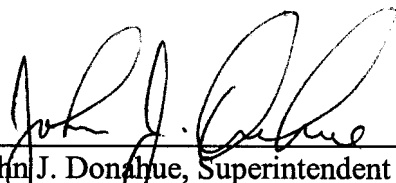
The public was invited to comment on the EA during a 30-day comment period. During this period the NPS received 1 comment letter by mail. The comment was in support of the preferred alternative and resulted in no changes to the text of the environmental assessment. The availability of the FONSI will be made public in a news release.

FINDING OF NO SIGNIFICANT IMPACT

The NPS has selected Alternative B for implementation. The selected alternative is described on pages 12-14 of the EA. The selected alternative will not constitute an action that normally requires preparation of an environmental impact statement (EIS). The selected alternative will not have a significant effect on the human environment. Negative environmental impacts that could occur are minor or moderate in intensity. There are no significant impacts on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the selected alternative will not violate any federal, state, or local environmental protection law.

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

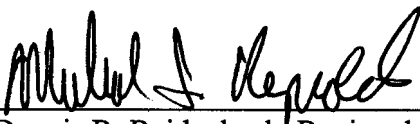
Recommended:


John J. Donahue, Superintendent

Delaware Water Gap National Recreation Area

7/29/08
Date

Approved:


Dennis R. Reidenbach, Regional Director
Northeast Region, National Park Service

8/11/08
Date