National Park Service U.S. Department of the Interior Glacier Bay National Park and Preserve Alaska Region



# **Concessions Housing Replacement and Associated Facilities**

Environmental Assessment

November 2021







As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural and cultural resources. This includes fostering the wisest use of our land and water resources, protecting our fish and wildlife, preserving the environmental and cultural values of our national parks and historical places, and providing for enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to assure that their development is in the best interests of all. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

### NOTE TO REVIEWERS

The public can review and comment on the EA from November 22 through December 21, 2021 at the NPS Park Planning website: <a href="https://parkplanning.nps.gov/GLBA\_ConcessionsHousing">https://parkplanning.nps.gov/GLBA\_ConcessionsHousing</a>

Comments will be accepted in the following ways:

- Preferred: Use the "Comment Now" button found under the Document List at the link above;
- Email: GLBA public comments@nps.gov;
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   all mailed comments must be postmarked by December 21, 2021.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be aware that your entire comment – including your personal identifying information – may be made publicly available at any time. You can ask us to withhold your personal identifying information from public review, but we cannot guarantee that we will be able to do so.

### ON THE COVER

View of Glacier Bay Lodge concessions housing from the park road in Bartlett Cove. Photo by Glacier Bay National Park and Preserve, National Park Service

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# **List of Acronyms**

ANILCA Alaska National Interest Lands Conservation Act

APE Area of Potential Effect

BMPs Best Management Practices

EA Environmental Assessment

FMP Frontcountry Management Plan

NPS National Park Service

TCP Traditional Cultural Property

## **Proposed Action**

The National Park Service (NPS) proposes to construct housing and maintenance facilities in support of concessions operations in Bartlett Cove within Glacier Bay National Park and Preserve (Glacier Bay). The proposed project is in the same geographical area as existing facilities and includes constructing a new consolidated dormitory and a maintenance building with an adjacent fenced-in staging area. New structures would be placed to visually screen concessioner operations more effectively from visitor use areas. The project also includes the removal of three deteriorating housing units and two single-story administrative outbuildings and modifications to utilities and parking areas in support of the newly constructed facilities.

Figure 1. Conceptual design of proposed dormitory



### 2 Purpose and Need

The purpose of the project is to address operational and structural deficiencies in the current Glacier Bay Lodge concessions assigned areas, provide visual screening from visitor use areas, remove viewshed impacts to the Glacier Bay Lodge Complex Historic District (Historic District), remedy deferred NPS maintenance, and ensure continuity of concessions operations. Additionally, the construction of a new dormitory and associated facilities would ensure all concessioner housing and service buildings meet federal requirements for safety (Occupational Safety and Health Administration, commonly referred to as OSHA), fire (National Fire Protection Association), accessibility (Architectural Barriers Act, Americans with Disabilities Act), and federal building codes.

This project is needed as multiple structures are deteriorated and the demand for concession services and housing has expanded beyond the capability of the current facilities. These projects would be part of the overall efforts of the NPS to remedy aging infrastructure, to improve visitor services in Bartlett Cove, and to fulfill a longstanding critical need as outlined in Glacier Bay's Frontcountry Management Plan (FMP) (NPS, 2019).

### 3 Background

In 2019, the FMP set forth management direction for a range of park priorities including services, facilities, and resource management in Bartlett Cove. This was done in response to aging infrastructure, changing recreation patterns, and a need to revisit long-standing operational practices, including addressing the financial viability of the Glacier Bay Lodge. The FMP also disclosed anticipated impacts in a supporting Environmental Assessment (EA).

This EA tiers from and further refines FMP proposals specific to concessioner housing as site design studies demonstrated multiple advantages of shifting development into previously undisturbed areas to:

- Achieve a more visitor-sensitive site development, where the sight and sounds of operational activities are less noticeable from the Glacier Bay Lodge, the Forest Trail, and the park road;
- Combine new and existing facilities in a design that offers a more campus-like feel; and
- Continue lodge operations during construction, supporting economic recovery for tourism after the 2020 COVID-19 related closure with business partner, community, and employee impacts.

In 2005, the concessions housing units were slated for demolition and replacement by the concessioner due to general deterioration; however, these plans were deferred. Since that time, the need for upgrades has continued and limited bed capacity has resulted in housing staff in lodge rooms, therefore reducing availability to visitors. The current project would address these problems as well as remedy related deferred NPS maintenance ensuring all new concessioner housing and service buildings meet federal safety and accessibility requirements.

The cost of renovating the existing dorms to meet minimum life safety code has been estimated to exceed the cost of constructing a new facility and would fail to remedy the shortage of staff housing. The proposed replacement dormitory would be built to current code requirements and markedly improve sustainable design and employee health, safety, and accessibility. To ensure continuation of lodge operations, it would be necessary to retain the existing housing units for concessioner staff during construction of the new dormitory; and as such, these buildings could not be immediately removed. For these reasons, implementing the proposed action would result in expanding beyond the existing footprint of the concessions services area. Areas cleared of existing structures would be maintained as developed areas for associated facilities (i.e., snow storage, parking, etc.).

Glacier Bay National Park & Preserve **CONTEXT MAP** National Park Service Bartlett Cove, Alaska Feet Glacier Bay Nationa Park and Preserve Bartlett Cove Legend Huna Glacier Bay Lodge Complex Historic District (FMP, 2019) Tribal Existing Structure Existing Trail or Footpath Contour (5 foot interval) ADEC Drinking Water Source Protection Zone (Alder Creek) Freshwater Visitor Saltwater Information **Glacier Bay** Station Intertidal Vegetation (Succession Edge) Vegetation (Forest) park entrance road Site Uses and Functions Lodge Administrative offices Concessions Employee housing Assigned Employee dining and break areas Cargo handling, logistics, storage Area 独出 Vehicle staging and multi-modal access - Maintenance and housekeeping support Recycling and waste management 11 Concessions Replacement Housing and Associated Facilities Project Bartlett Cove, Alaska Date: 3/11/2021

Figure 2. Bartlett Cove in Glacier Bay National Park and Preserve

### 4 Issues

### **Issues Selected for Detailed Analysis**

**Vegetation:** Construction of the replacement dormitory and associated facilities would remove up to 1.5 acres of vegetation, resulting in loss of ground cover, understory species, and mature trees, thus altering vegetation communities and potentially introducing and spreading invasive species.

Glacier Bay Lodge Complex Historic District: Bartlett Cove contains rich cultural resources and is home to the National Register of Historic Places (NRHP) eligible nationally significant Glacier Bay Lodge Complex Historic District. The existing concessions area is visible from the Historic District and therefore changes to the viewshed of the historic district site could alter the integrity of the historic district or cultural landscape.

### **Issues Considered but Dismissed**

Archaeological Resources: The Bartlett Cove area includes many archaeological resources, sites, and individual features, such as culturally modified trees and abandoned dock pilings. An archaeological inventory of the Area of Potential Effect (APE) was conducted in accordance with Section 106 of the National Historic Preservation Act (NPS, 2021). No archaeological resources, sites, or individual features were identified during this investigation, nor were any identified during the records and file searches conducted for the APE (Lewis and Mobley 1994). The soil characteristics and terrain within the APE suggest a low probability for subsurface cultural materials; however, there is still a potential risk of discovery or damage to previously unknown resources during construction. Cultural resource monitoring would be implemented during ground disturbing construction activities to ensure the project produces no adverse impacts to cultural resources, known eligible resources, or to previously unknown subsurface archaeological deposits. The potential to impact archaeological resources, including if an unknown resource is found, would be addressed by implementing cultural monitoring protocols; therefore, this topic is dismissed from further analysis.

**Socioeconomic**: Existing bed capacity for concessioner staff is limited, resulting in housing staff in lodge rooms and reducing room availability to visitors. The proposed replacement dorm and supporting facilities would benefit the economic viability of the Glacier Bay Lodge by increasing visitor capacity and adequately separating visitor and concessioner employee use areas. While acknowledging the potential benefit to the economic viability of the lodge, a detailed analysis of socioeconomic impacts is not necessary to make a reasoned choice between alternatives.

**Soils:** The proposed action would displace soils up to 1.5 acres, resulting in changed and newly exposed soil horizons. Soils would be modified to provide for appropriate slope and features to ensure proper site drainage. Suitable soils not used in the proposed project area would be prioritized for use in future projects and would be properly managed to avoid introduction of invasive species. This project may require retaining features (i.e., sufficient angle of repose, retention features, and revegetation) to prevent future erosion and sloughing (see Appendix D of FMP (2019) for details). The small scale of potential impacts to soils adjacent to a developed site does not warrant a detailed analysis.

Subsistence Use: The Alaska National Interest Lands Conservation Act (ANILCA) Section 810 requires federal agencies to evaluate the potential impacts of proposed actions on subsistence uses and needs on federal lands in Alaska. The proposed project is located within Glacier Bay National Park, established prior to ANILCA, and NPS regulations prohibit subsistence uses on these lands (36 CFR, part 13). To ensure there is no significant restriction or increase in competition for ANILCA Title VIII subsistence resources proximal to the site or within the broader region, the proposed action was included in concept within the Section 810 analysis and consequent decisions completed for the FMP EA from which this EA is tiered (see Appendix B, FMP 2019). The proposed action is consistent with the FMP and no additional analysis is needed.

Traditional Cultural Property: In 2004, a cultural landscape inventory of Bartlett Cove was conducted by the NPS Alaska Regional Office (NPS 2004). The study concluded that Bartlett Cove qualified as a Traditional Cultural Property (TCP) due to the area's association with L'éiwshaa Shakee Aan, a prehistoric settlement described in oral tradition, and the deep historic roots the area shares with the Huna Tlingit. Consultation between the National Park Service and the Hoonah Indian Association has been ongoing for this proposed project. Consultation resulted in the determination that NPS activities within previously developed areas which change but do not substantially expand infrastructure within Bartlett Cove result in no adverse effect to the TCP. The cultural landscape inventory and tribal consultation represents a sufficient investigation of the impacts for both alternatives. The continued presence of infrastructure dedicated to concessioner housing within the APE is consistent in both the no action and preferred action alternatives. As such, the analysis and consultation indicate neither alternative would alter the current state of the TCP.

Visitor Services: The proposed project would meet an identified need to improve visitor services in Glacier Bay and would not be expected to adversely impact other park resources that visitors experience. Trail closures are not anticipated. The project includes specific measures to ensure that visitor services are not interrupted as a result of the project or its construction period. Although the proposed dormitory would replace three smaller buildings with one large building, most elements of the viewshed would be improved for visitors due to strategic screening placement. Only temporary changes to acoustic resources are expected, limited in duration to the construction period and occurring in an area where human sounds dominate. With little potential to impact visitor services, this topic is dismissed from further analysis.

Wildlife and Habitat: The removal of up to 1.5 acres of vegetation adjacent to an existing developed site in an area with multiple forms of human use is not expected to substantially alter wildlife behavior or habitat. Construction activities would be conducted in accordance with the requirements of the International Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act (see Appendix D of FMP (2019) for details). Vegetation removal would be prioritized outside the designated nesting bird season (April 15th - July 15th); however, nesting bird surveys would be conducted in coordination with U.S Fish and Wildlife Service to support construction during the designated nesting bird season. U.S. Fish and Wildlife Service recommended mitigations to reduce nest disturbance and impacts to individual birds would be implemented minimizing the potential for adverse impacts. Best practices as delineated in Glacier Bay's Bear Management Plan

(2013) would be implemented in project design to ensure proper storage and waste management for the protection of staff, visitors, and wildlife. With little potential to impact wildlife or habitat, this topic is dismissed from further analysis.

Other Resources: The proposed project site does not include and would not affect floodplains, wetlands, threatened and endangered species, or wilderness. Construction activities could generate noise, dust, and equipment exhaust during the construction period; impacts to acoustic resources and air quality are expected to be at low levels and localized in the vicinity of the project site during the construction period. A detailed analysis of impacts to these resources is not necessary to make a reasoned choice between alternatives.

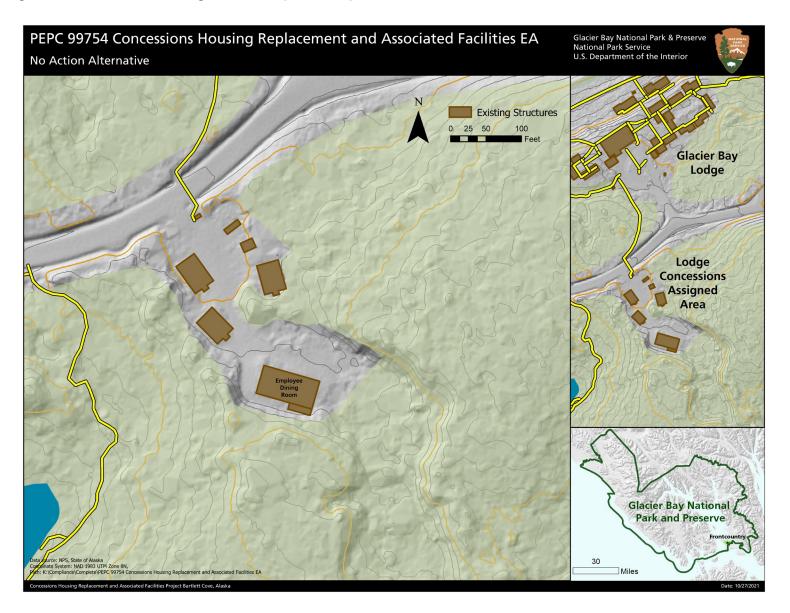
### 5 Alternatives

This section describes the No Action alternative and the Preferred Action alternative, as well as a brief description of an alternative that was considered but dismissed from further analysis. Table 1 presents a detailed comparison of the No Action and Preferred Action alternatives.

### **Alternative 1: Existing Conditions (No Action)**

Under the No Action Alternative, no new concessions facilities would be constructed (Figure 3). Existing conditions and uses would continue as in the past. Housing shortages, operational and structural deficiencies, and shortcomings regarding federal requirements for building codes, safety (Occupational Safety and Health Administration), fire (National Fire Protection Association), and accessibility (Architectural Barriers Act, Americans with Disabilities Act) would only be addressed sufficient to meet legal requirements. Operations in the visitor area would continue to be based in multiple locations, which are not well screened from public view.

Figure 3. Alternative 1: Existing Conditions (No Action)



# Alternative 2: Construct Concessions Employee Housing and Associated Facilities (Proposed Action and Preferred Alternative)

Under Alternative 2, the NPS would replace three deteriorating concessions employee housing units with one two-story consolidated dormitory (~12,600 sq. ft.) located to the east of the Employee Dining Room; and construct concessioner operational facilities, including an open-bay maintenance building (~1,800 sq. ft.) with an adjacent fenced-in staging area (~1,200 sq. ft.) located on the east side of the entrance driveway. Upon completion of the replacement dormitory, the three deteriorating housing units (1,125 sq. ft./unit) and two single-story units (144 sq. ft./unit) would be removed. A one-lane access road would be constructed to the south of the Employee Dining Room for administrative or emergency use. Utilities and parking areas (~1,200 sq. ft.) would be improved and modified to support new facilities and function of the project area (i.e., ADA and bus parking, vehicle plug-ins, appropriate drainage, and snow pile storage).

Areas cleared of existing structures would be maintained as developed for administrative purposes. All project components would be located within the same geographical area and would result in an expansion of the concessions assigned area by up to 1.5 acres (Figure 4). It is the intention of the NPS to design the site to minimize the impacts to previously undisturbed areas. Note that no changes to the Employee Dining Room are proposed.

Best management practices (BMPs) from FMP Appendix D, Alaska Region Invasive Plant Management EA (NPS 2009), and Alaska Exotic Plant Management Protocol would be implemented throughout construction and thereafter to minimize impacts. Proposed infrastructure would be designed and constructed to retain as many trees and as much vegetation as possible. A botany survey would be conducted prior to construction to confirm that no rare plants (Nawrocki et al 2013) exist in or near the proposed project area. Existing buffers of natural vegetation surrounding infrastructure would be maintained to act as visual screening.

Following a Visual Contrast Rating analysis completed in November 2021, the final design would use appropriate lighting and color schemes to ensure there is no adverse impact to the existing viewshed. Cultural monitoring mechanisms would be in place to respond accordingly in the event of an archaeological discovery, as well as an inadvertent discovery of human remains, per NPS procedures in Director's Order 28 and the guiding regulations found in 36 CFR 800.13.

Figure 4. Alternative 2: Construct Concessions Employee Housing & Associated Facilities (Proposed Action & Preferred Alternative)

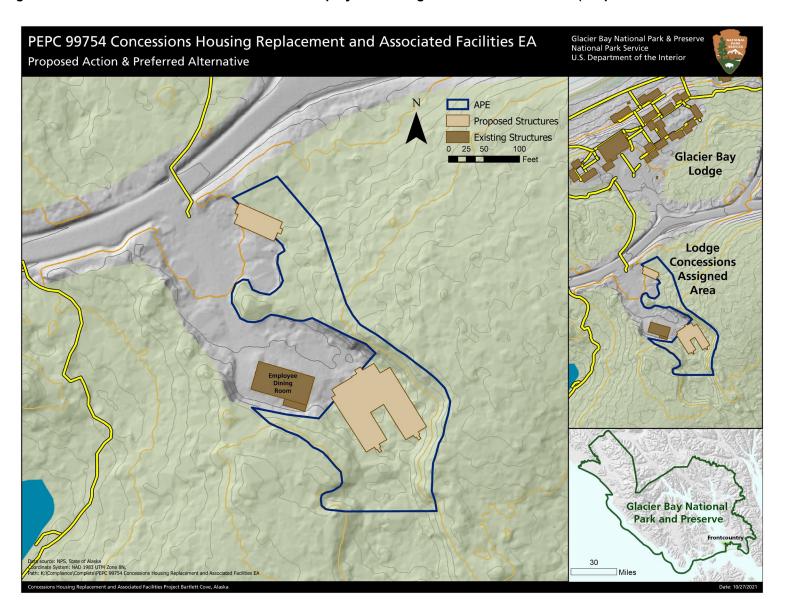


Table 1. Detailed comparison of alternatives.

Action	Alternative 1: Existing Conditions (No Action)	Alternative 2: Construct Concessions Employee Housing and Associated Facilities (Preferred Alternative)
Construct Concessions Replacement Dormitory	None of the components detailed under Alternative 2 would be constructed. Existing conditions would occur:  • Up to 68 concessioner employees would continue to reside in 3 deteriorated facilities, as well as in rooms within Glacier Bay Lodge.  • Shortcomings regarding accessibility, life, fire, and safety would only be addressed sufficient to meet legal requirements. ADA-compliant rooms would remain unavailable.  • The opportunity to build a facility with sustainable design elements fitted to current staffing levels would not occur.	<ul> <li>A new two-story dorm capable of housing up to 68 employees would be constructed on the southeast side of the Concession's Employee Dining Room.</li> <li>Total size would be approximately 12,600 sq. ft.</li> <li>A total of 4 ADA-compliant rooms would be provided.</li> <li>The structure would consist of wood construction with standing seam metal roofing and siding panels.</li> <li>The Employee Dining Room would remain unchanged.</li> </ul>
Remove Extant Housing Units and Outbuildings	<ul> <li>Extant housing units and outbuildings would continue to be used as in the past.</li> <li>Shortcomings regarding accessibility, life, fire, and safety would only be addressed sufficient to meet legal requirements.</li> </ul>	<ul> <li>Three 24 x 45 ft. two-story wood-framed housing units would be removed, including all foundation piers and associated utilities (e.g., sewer, electrical lines, infrastructure).</li> <li>Two 12x12 ft. single-story outbuildings, including a standard Conex trailer and shed, would be removed.</li> <li>Materials would be salvaged by NPS and repurposed if reasonable.</li> </ul>
Construct Maintenance Building and a Fenced- In Staging Area	Concession maintenance operations would continue to be dispersed in different parts of Bartlett Cove, lacking both screening from park visitors and fencing for outside storage areas.	<ul> <li>An 1,800 sq. ft. (30 x 60') single-story open-bay concession maintenance building (12 ft. tall open bay) would be constructed on the east side of the entrance driveway, to include maintenance, groundskeeping, and waste management operations.</li> <li>An adjacent 1,200 sq. ft. (30 x 40 ft.) fenced-in staging area would be constructed.</li> </ul>

Action	Alternative 1: Existing Conditions (No Action)	Alternative 2: Construct Concessions Employee Housing and Associated Facilities (Preferred Alternative)
Modified Utilities and Parking Area	Existing utilities would remain in place; parking would continue to be non-delineated; and ADA-compliant parking would be limited to 1 designated space.	<ul> <li>A minimum of 2 ADA-compliant parking spaces would be provided adjacent to the dormitory.</li> <li>A parking area measuring 1,200 sq. ft. with approximately four electric vehicle charging stations would be constructed.</li> <li>A total of 2 bus parking spaces (12 ft. x 25 ft. each) would be provided.</li> <li>Utilities to support site build-out would be consolidated and updated.</li> <li>Design would include engineered drainage and stormwater management features and would be monitored after project completion for any changes in drainage or sedimentation.</li> <li>Snow removal and accumulation sites would be included.</li> </ul>
Other Project Details	Previously undisturbed land would remain in its current state.	<ul> <li>Up to 1.5 acres of vegetation would be disturbed, with good faith effort on part of NPS and designers to minimize acreage and impacts.</li> <li>Proposed infrastructure would be designed and constructed to retain as many trees and as much vegetation as possible.</li> <li>Suitable soil and large rocks would be used on site or repurposed within the park.</li> <li>In accordance with BMPs, all imported fill and equipment must be clean, free of dirt and/or seeds, and inspected prior to storage or use on park lands to prevent the introduction of invasive species.</li> <li>Select trees removed during construction may be retained by the NPS for administrative uses such as building material or firewood for the Bartlett Cove Campground. If there is not administrative need for the timber, large trees would be donated to local non-profits for use as firewood.</li> <li>Construction contractor/s must follow requirements for staging, storage, construction site fencing, parking, and communication with the public per guidelines in Appx D (FMP, 2019).</li> </ul>

<sup>\*</sup>All measurements are approximate.

#### **Alternatives Considered but Dismissed**

Under another alternative, construction of the new facilities within the existing disturbed footprint of the concessions assigned area was considered. This alternative was dismissed as the existing dorms would need to be removed prior to construction, thus eliminating a substantial portion of available housing for concessioner staff. Additionally, the current footprint is not physically adequate to accommodate the proposed structures, therefore requiring reorganization of the concessions area such that functional avenues and emergency access are maintained. This alternative was dismissed as it fails to remedy the overall shortage of housing available for concessioner staff, and it is disproportionately expensive, particularly as it fails to remedy other concerns regarding the deteriorating physical state of the buildings.

### 6 Affected Environment

This section describes the existing condition of the resources within the proposed project area that could be potentially affected by the alternatives.

The proposed project area is situated within the larger developed area of Bartlett Cove to the south of the Glacier Bay Lodge and directly to the east of the Forest Loop Trail. The proposed project area is located within the previously developed concessioner housing area (~1 acre) and extends into the adjacent undisturbed areas (<1.5 acres). The APE is the same as the proposed project.

### Vegetation

The project area is in a Sitka spruce/western hemlock forest with the predominant species of Sitka spruce (*Picea sitchensis*) and some western hemlock (*Tsuga heterophylla*). Devil's club, blueberries, and various other shrubs constitute the understory. Sitka alder (*Alnus viridis* ssp. *sinuata*) occupy many openings and recently disturbed areas. Routine clearing around buildings, roadside corridors, and trails has created non-natural thickets of alder, horsetail, and other plants, including invasive species (FMP, 2019). Sitka spruce and hemlock forests are widespread in the park, covering over 300,000 acres of the park's vegetated land (Boggs et al., 2008). There are currently no rare plants known to occur in or near the proposed project area.

Vegetation in the existing concessions area (~1 acre) was previously cleared to permit construction of the current facilities, as well as for installation of underground utilities and the creation of permeable and impermeable surfaces for driveways and parking areas. Existing facilities in the Bartlett Cove area cover about 31 acres of land. The majority of actions affecting vegetation, with the exception of trails, have occurred within or adjacent to existing developed areas (FMP, 2019). The proposed action would require new ground disturbance and vegetation clearing affecting up to 1.5 acres of previously undisturbed land.

Although construction and maintenance of existing buildings, roads, and trails in Bartlett Cove have resulted in disturbed soils where invasive plant populations have become established (FMP, 2019), there are no priority invasive species within the proposed project area. New ground disturbance and the use of machinery and engineered fill could, however, result in the introduction and spread of invasive species.

Potential future actions identified on a conceptual level in the FMP (2019) that are in close proximity to the project area and have the potential to affect vegetation include, but are not limited to, the construction of the

Cooper's Notch Trail (~2.3-2.5 miles), a six-site drive-in campground (<0.5 acres), and re-routing up to 1,000 linear feet of the Forest Loop Trail (<0.1 acres).

Additionally, Glacier Bay is in the process of creating a Fire Management Plan. When adopted and implemented, clearing around structures would follow guidelines defined in the plan.

### **Glacier Bay Lodge Complex Historic District**

The Glacier Bay Lodge Complex Historic District, eligible for the National Register of Historic Places, is situated on a gentle slope above the south shore of Bartlett Cove, directly adjacent to the northmost end of the proposed project area. Construction of the lodge and guest cabins in 1966 was contracted through a Seattle based architect, John Morse, who had recently designed the Sitka National Historical Park Visitor Center (Allabeck, 2000; NPS, 2011). In keeping with Mission 66, Morse designed an award-winning complex using modern architectural forms that blended with the natural environment, winning the Seattle Chapter of the American Institute of Architecture Honor Award. The district, which consists of a lodge and two guest cabin areas, lies in an east-west alignment approximately 200' south of and parallel to the shoreline (NPS, 2011). Under the protection of the lodge's sweeping cedar shake roof that juts upward toward the sky, spacious windows provide a sweeping view of Bartlett Cove and the surrounding mountains to the north. To the south, a circular drive provides vehicle access to the complex through the tall spruce and hemlock framed entrance (NPS, 2011).

The existing concessioner facilities, constructed in the early 1980's, created a visual impact on the historic viewshed from the lodge main entrance. Despite the growth of the forest and vegetation screening some of the concessioner structures, they are still visible from the lodge and continue to adversely affect the historic viewshed.

## 7 Impact Analysis

### **Alternative 1: Existing Conditions (No Action)**

Implementing the No Action Alternative would retain existing structures; new facilities would not be constructed. Surrounding vegetation would remain unaffected, including up to 1.5 acres of previously undisturbed vegetation remaining intact. There would be no potential for invasive species to be introduced and/or spread by machinery, engineered fill, or construction related ground disturbance. The presence of the existing two-story copper roofed buildings would continue to adversely affect the historic viewshed of the Historic District. Federal requirements for building codes, safety (Occupational Safety and Health Administration), fire (National Fire Protection Association), and accessibility (Architectural Barriers Act, Americans with Disabilities Act) would only be addressed sufficient to meet legal requirements. Existing conditions would be perpetuated.

# Alternative 2: Construct Concessions Employee Housing and Associated Facilities (Proposed Action and Preferred Alternative)

#### Vegetation

Impacts to the site would include the removal of up to 1.5 acres of mature trees, shrubs, and ground cover. The extension of impermeable surfaces in the area could impact drainage by changing sheet flow and water

absorption, which could impact remaining vegetation. Project design would include engineered drainage and stormwater management features to prevent erosion and flooding and associated impacts.

In accordance with BMPs outlined in the Alaska Region Invasive Plant Management Plan EA (NPS 2009), any equipment and materials stored by the NPS and its contractor/s must be clean, free of dirt and/or seeds, and inspected prior to storage or use on park lands to prevent the introduction of invasive species. Additional implementation of mitigation measures (Appendix D, FMP, 2019) during and after construction activities would minimize the establishment and spread of invasive species, thus reducing adverse impacts to native plant species in the project area.

In general, the vegetative community within Glacier Bay National Park and Preserve would continue to function as in the past. When these effects are combined with other proposed actions identified in the FMP (2019), the expected impact on Sitka spruce/hemlock forest would contribute to, but would not substantially change, the composition and function of the vegetation community. Therefore, the removal of up to 1.5 acres of vegetation would not be expected to impact forest species at a population level as the disturbance would be localized to the construction site and the species affected are common throughout the 7,000-acre Bartlett Cove frontcountry area.

### Glacier Bay Lodge Complex Historic District

The proposed project area would be directly adjacent to the National Register of Historic Places eligible Glacier Bay Lodge Complex Historic District. Assessments of both the current viewshed and proposed visual changes were conducted. These analyses determined that the visibility of the existing concessioner housing units adversely affect the viewshed from the entrance of the Historic District. The existing buildings are two-story and have non-natural copper-colored roofs (NPS, 2021). The proposed consolidated dormitory would be located at the southern end of the APE. This would be outside of the viewshed of the Historic District and would take advantage of additional topography and existing vegetation screening. Associated facilities, including a maintenance building with an adjacent fenced-in staging area, would be constructed on the northern part of the proposed project area near the park road. Potential impacts to the visual integrity of the Historic District would be minimized through the implementation of design, site placement, and retaining natural vegetative screening. These facilities would be low-profile and have green or brown roofing to blend in with the natural surroundings. These actions would improve the current historic viewshed from the entrance.

Table 2. Summary of impacts under each alternative.

Issue	Alternative 1: Existing Conditions (No Action)	Alternative 2: Construct Concessions Employee and Maintenance Facilities (Proposed Action & Preferred Alternative)
Vegetation	<ul> <li>No new impacts; current structures and facilities would remain in place.</li> <li>Up to 1.5 acres of previously undisturbed vegetation would remain intact.</li> </ul>	<ul> <li>Up to 1.5 acres of previously undisturbed vegetation would be removed.</li> <li>Newly disturbed soils could result in the establishment of invasive plant species.</li> </ul>

Issue	Alternative 1: Existing Conditions (No Action)	Alternative 2: Construct Concessions Employee and Maintenance Facilities (Proposed Action & Preferred Alternative)
Glacier Bay Lodge Complex Historic District	<ul> <li>No new impacts; current structures and facilities would remain in place.</li> <li>Continued visual impacts to the Historic District.</li> </ul>	<ul> <li>Aging, non-historic structures would be removed from the historic viewshed.</li> <li>New structures would utilize implementation of design, site placement, and retaining natural vegetation screening to minimize visual impacts to the historic viewshed.</li> </ul>

### 8 Consultation and Coordination

The park began consultation in January 2021 with the Alaska State Historic Preservation Office (SHPO) regarding the proposed project. SHPO reviewed the park's cultural resources inventory report (NPS, 2021), per the National Historic Preservation Act and its implementing regulations 36 CFR part 800. SHPO concurred with Glacier Bay's finding of "No Historic Properties Adversely Affected" on November 10, 2021.

The park began Tribal Consultation with the Hoonah Indian Association on February 12, 2021 and has continued with the distribution of this Environmental Assessment.

The public will be invited to comment on this Environmental Assessment beginning November 22, 2021.

### 9 References

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