



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

**Glacier Bay National Park and Preserve  
Interior Region 11 – Alaska**

**FINDING OF NO SIGNIFICANT IMPACT  
Concessions Housing Replacement and Associated Facilities**

Recommended:

*Philip M. Hooge*

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*2/11/22*

Date

Approved:

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Date

# 1. Introduction

In June of 2019, Glacier Bay National Park and Preserve (Glacier Bay) finalized the Frontcountry Management Plan (FMP) which set forth a long-term Planning Vision (Part I), an FMP Environmental Assessment (FMP EA) (Part II), and a Finding of No Significant Impact (FONSI) (Part III) [[Glacier Bay National Park Frontcountry Management Plan \(nps.gov\)](https://www.nps.gov/glacierbay/management-plan)]. The FMP EA analyzed the NPS preferred alternative to restore the Glacier Bay Lodge Complex Historic District (Historic District) and to Improve Visitor Experience and Park Operations (NPS, 2019, p. II-9-12). The FMP EA assumes that prior to the construction of facilities, site-specific environmental analysis, permitting and consultation will occur as appropriate, as further feasibility and site design studies are completed (NPS, 2019, p. II-3). The Concessions Housing Replacement and Associated Facilities EA is a site-specific project which accomplishes the intent of the Planning Vision to, “improve lodge employee housing within its assigned property area” (NPS, 2019, p. I-24; Appendix A-6) and performs a site-specific analysis of construction of facilities.

In compliance with the National Environmental Policy Act (NEPA), the National Park Service (NPS) prepared this EA to examine alternative actions and environmental impacts associated with the proposed project to construct housing and maintenance facilities in support of concessions operations in Bartlett Cove within Glacier Bay. 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, remedy deferred NPS maintenance, and ensure continuity of concessions operations. 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. This project will fulfill a longstanding critical need identified in Glacier Bay’s 2019 FMP.

The statements and conclusions reached in this FONSI are based on documentation and analysis provided in the EA, Errata (Appendix A), Response to Comments (Appendix B), and associated decision file. Relevant sections of the EA are incorporated by reference.

## 2. Selected Alternative and Rationale for the Decision

Based on the analysis presented in the EA, the NPS selected Alternative 2 – Construct Concessions Employee Housing and Associated Facilities (NPS preferred alternative).

Alternative 2 will fulfill a longstanding critical need as outlined in Glacier Bay’s FMP (NPS, 2019) by constructing a new consolidated dormitory and concessions maintenance building (Figure 1). Upon completion of the replacement dormitory, the three deteriorating employee housing units and two administrative units will be removed. A one-lane access road will be constructed to the south of the Employee Dining Room for administrative or emergency use. Utilities and parking areas will be improved and modified to support new facilities and function of the project area (i.e., American Disability Act [ADA] and bus parking, electric vehicle plug-ins, appropriate drainage, and snow pile

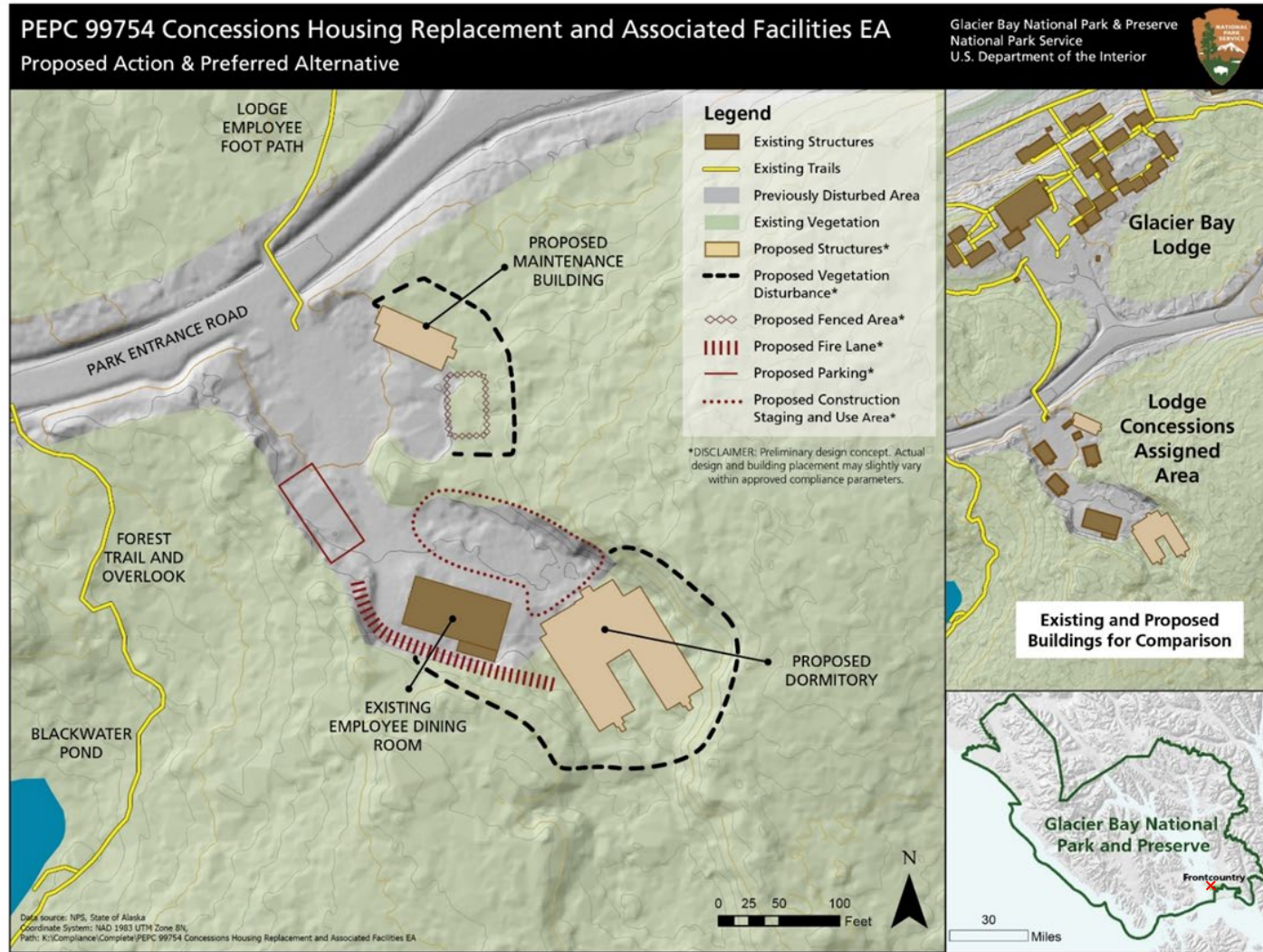
storage). All project components will be located within the same geographical area and will result in an expansion of the concessions assigned area by up to 1.5 acres.

Best management practices (BMPs) from the FMP Appendix D (NPS, 2019), Alaska Region Invasive Plant Management Plan (NPS, 2009), and Alaska Exotic Plant Management Protocol (NPS, 2015) will be implemented throughout construction and thereafter to minimize impacts. No known rare species exist in the project area. Existing buffers of natural vegetation will be maintained to maximize visual screening from visitor use areas. The final design will use appropriate lighting and color schemes to ensure there are no adverse impacts to the existing viewshed. Cultural monitoring mechanisms will be in place to respond accordingly in the event of an archaeological discovery or discovery of human remains.

## **Rationale**

Alternative 2 was selected because it best meets the project purpose and need to replace concessioner housing to conform to contemporary building codes, improve visitor experience, and contribute to continuity of park operations (NPS, 2021b, p. 2). The dorm design will accommodate contemporary staffing needs and be compatible with the adjacent Glacier Bay Lodge Complex Historic District in terms of design, materials, setting, and location.

Figure 1. Alternative 2: Construct Concessions Employee Housing & Associated Facilities



### **3. Public Involvement and Agency Consultation**

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

The park initiated Tribal Consultation with the Hoonah Indian Association (HIA) on February 12, 2021 by email. Bob Starbard, HIA Tribal Administrator, responded, "Hoonah Indian Association has no specific concerns with regards to this project. HIA would inquire as to potential preference in bidding which might be afforded to business entities owned or controlled by tribal citizens in the contract bidding on the contracted work or in the subcontracted components thereof." The park responded to HIA acknowledging their interest and reporting that due to the scope of this project, it will be announced as a full, open bid and they may compete for it if that's of interest to them. NPS staff will be available to discuss the project with HIA as desired. The NPS will distribute this FONSI to the HIA.

The NPS provided a public comment period on the EA through Planning, Environment, and Public Comment (PEPC) from November 22 – December 21, 2021. Three submissions that resulted in 30 non-substantive comments were received through PEPC and the park e-mail (Appendix B). The NPS considered these comments when finalizing the EA and determining this FONSI.

### **4. Finding of No Significant Impact**

As described in the EA, the selected alternative will affect vegetation and the Glacier Bay Lodge Complex Historic District. The NPS found these effects would not have the potential for significant impacts, as described below. Additionally, based on the Non-Impairment Determination, NPS concluded the proposed action will not result in impacts to park resources and values that constitute impairment (Appendix C).

Construction of the consolidated dormitory and maintenance building will affect vegetation. Up to 1.5 acres of mature trees, shrubs, and ground cover will be removed to implement all project components. The extension of impermeable surfaces may affect drainage by changing sheet flow and water absorption; however, the project design will include engineered drainage and stormwater management features to prevent erosion and flooding. No known rare species exist in the project area (Nawrocki, 2013).

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 will 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 and incorporation of BMPs (NPS, 2019, Appendix D) during and after construction activities will 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 will continue to function as in the past. The removal of up to 1.5 acres of vegetation will not be expected to impact forest species at a population level as the disturbance will be localized to the construction site and the species affected are common throughout the 7,000-acre Bartlett Cove frontcountry area. When these effects are combined with other proposed actions identified in the FMP (NPS, 2019), the expected impact on Sitka spruce/hemlock forest will contribute to, but will not substantially change, the composition and function of the vegetation community.

Implementing the selected alternative will be beneficial to and will not adversely affect the Glacier Bay Lodge Complex Historic District. Removing the existing concessioner housing units will eliminate the adverse effect currently imposed on the Historic District. The consolidated dormitory will be located outside of the viewshed of the Historic District and will take advantage of additional topography and existing vegetation screening, resulting in no adverse effects. The maintenance building will 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 will be minimized through the implementation of design, site placement, and retaining natural vegetative screening. These facilities will be low-profile and have green or brown roofing to blend in with the natural surroundings. Overall, this project will improve the current historic viewshed from the entrance.

Implementation of the project will not generate significant impacts on archaeological resources, Traditional Cultural Properties, visitor services, or wildlife. No highly uncertain or controversial impact, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the NPS selected alternative will not violate any federal, state, or local environmental protection law.

The selected alternative will have long term beneficial effects on public health and safety by ensuring all concessioner housing and service buildings meet Occupational Safety and Health administration, National Fire Protection Association, and ADA codes and standards.

## **5. Conclusion**

As described above, the selected alternative does not constitute an action meeting the criteria that normally requires preparation of an environmental impact statement (EIS). The conclusion of no significant impact is based on the analysis compiled from a combination of scientific data and professional judgment from NPS staff and documented in the environmental assessment. The selected alternative will not have a significant effect on the human environment in accordance with Section 102(2)(c) of the NEPA.

## 6. Appendices Include:

- Appendix A: Errata Indicating Text Changes to the Environmental Assessment
- Appendix B: NPS Responses to Public Comment
- Appendix C: Non-Impairment Determination on the Environmental Assessment

## 7. References

National Park Service. 2006. Management Policies 2006. U.S. Department of the Interior, National Park Service, Washington, D.C.

National Park Service. 2009. Alaska Region Invasive Plant Management Plan Environmental Assessment. <https://parkplanning.nps.gov/projectHome.cfm?parkID=1&projectID=15850>

National Park Service. 2015. Alaska Region Exotic Plant Management Geodatabase. <https://data.doi.gov/dataset/akr-exotic-plant-management-epmt-geodatabase>

National Park Service. 2019. Glacier Bay National Park and Preserve Frontcountry Management Plan (FMP). <https://www.nps.gov/glba/learn/management/frontcountry.htm>

National Park Service. 2021a. An Archeological Inventory for the Proposed Concessions Housing Replacement and Associated Facilities: Glacier Bay National Park and Preserve, Gustavus, Alaska.

National Park Service. 2021b. Concessions Housing Replacement and Associated Facilities Environmental Assessment: Glacier Bay National Park and Preserve, Gustavus, Alaska. <https://parkplanning.nps.gov/projectHome.cfm?projectID=99754>

Nawrocki, T. J. Fulkerson, and M. Carlson. 2013. Alaska Rare Plant Field Guide. Alaska Natural Heritage Program, University of Alaska Anchorage. 352 pp.

# Appendix A:

## Errata Indicating Text Changes to the Concessions Housing Replacement and Associated Facilities EA

This Errata clarifies and amends the Environmental Analysis in response to questions, comments, or concerns raised by the public and/or NPS staff during the development of this project. The new information provides clarification on how this project accomplishes the goals and objectives of the FMP EA (NPS, 2019), and discloses effects to resources during construction activities. This new information is not substantial and does not lend the need of a new public comment period. Original text from the EA is included below to provide context and present changes. Removed text is shown in ~~strikethroughs~~ and new text is shown as underlined.

### ERRATA

#### Introduction

In June of 2019, Glacier Bay National Park and Preserve (Glacier Bay) finalized the Frontcountry Management Plan (FMP) which set forth a long-term Planning Vision (Part I), an FMP Environmental Assessment (FMP EA) (Part II), and a Finding of No Significant Impact (FONSI) (Part III) [[Glacier Bay National Park Frontcountry Management Plan \(nps.gov\)](https://www.nps.gov/glacierbay/management-plan)]. The FMP EA analyzed the NPS preferred alternative to restore the Glacier Bay Lodge Complex Historic District and to Improve Visitor Experience and Park Operations (NPS, 2019, p. II-9-12). The FMP EA assumes that prior to the construction of facilities, site-specific environmental analysis, permitting and consultation will occur as appropriate, as further feasibility and site design studies are completed (NPS, 2019, p. II-3). This Concessions Housing Replacement and Associated Facilities EA is a site-specific project which accomplishes the intent of the Planning Vision to, “improve lodge employee housing within its assigned property area” (NPS, 2019, p. I-24; Appendix A-6) and performs a site-specific analysis of construction of facilities.

#### Purpose and Need, Section 2, Page 2

The FMP EA describes a need to evaluate conditions and facilities to create operational efficiencies and to identify options for addressing facilities that are nearing the end of their life cycle (NPS, 2019, p. II-2). 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. The FMP EA describes a need to re-evaluate the range of visitor opportunities provided in Glacier Bay’s frontcountry (NPS, 2019, p. II-2). Specifically, the purpose of this project is 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.

~~These project-~~ This project 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).

### **Background, Section 3, Page 2**

~~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.~~

### **New Issues Considered but Dismissed, Section 4, Page 5**

This section addresses potential effects specific to visitor and concessions staff use and/or experience during construction. The Concessions EA incorporates by reference mitigation measures and BMPs from Appendix D of the FMP and analysis from the FMP EA where relevant, therefore reducing or eliminating effects to the resource/issue.

**Safety:** The concessions area is predominately used by the concessioner employees. During construction, employees would continue to access the employee dining room and existing housing units. Appendix D of the FMP describes general construction measures and best management practices (NPS, 2019, Appendix D-1). This project would incorporate by reference these mitigation measures and best management practices (BMPs), including the clear identification of construction areas and implementation of necessary fencing during construction. The proposed project would adhere to 29 CFR Part 1926 Safety and Health Regulations for Construction (OSHA), and a jobsite specific Accident Prevention Plan would be completed prior to initiating construction outlining each phase of work, associated hazards, and methods proposed to ensure property protection and safety of the public, NPS staff, concessioner employees, and contractor employees. In line with conclusions from the Finding of No Significant Impact authorizing the FMP, the proposed action would not result in significant impacts on public health or public safety (NPS, 2019, p. III-8). Based on incorporation of these BMPs and considerations to safety, construction activities would not adversely affect human health and safety; therefore, this issue is dismissed from further analysis.

**Parking:** Existing parking in the project area accommodates concessioner employees and Lodge administrative use and is currently unmarked and limited. During construction, within the concessions assigned area, construction may affect concessioner employee parking; however, suitable parking would be provided in an adjacent administrative site. As a design-build contract, a formal construction parking and staging plan would be completed as part of the final construction design. Across the Park Road, outside the proposed project area, additional parking is available for Lodge visitors and short-term NPS and concessions administrative use. Construction activities would not affect parking outside of the proposed project area as this project would incorporate by reference mitigation measures and BMPs outlined in Appendix D of the FMP (NPS, 2019, Appendix D-1), such as limiting parking areas for construction vehicles to staging areas (i.e., NPS maintenance yard, Depot, etc.), existing roads, and identified previously disturbed areas.

The issue of parking during construction activities was considered but not analyzed in detail, because the project would not affect visitor parking, and safe parking would be made available for concessioner employees and administrative staff.

**Soundscape:** Currently, both human- and natural-caused sounds are common in Bartlett Cove, including vehicles on the park road system; the Park's diesel electrical generators; routine construction and maintenance; boat traffic; water (e.g., streams, waves, rain); wind; and wildlife (NPS, 2019, p. II-55). Proposed construction activities would contribute to localized, short-term increases in human-caused sounds that would affect concessioner employees and may be heard in visitor areas (i.e., Glacier Bay Lodge, Forest Loop Trail). Mitigation measures and BMPs are outlined in Appendix D of the FMP to reduce visitor and concessioner employee related impacts, including noise abatement strategies during construction such as scheduling activities to minimize impacts on adjacent noise-sensitive users; the use of quieter impact tools when feasible; the placement of stationary noise sources as far from sensitive uses as possible; and the use of noise-muffling, shielding, or fencing (NPS, 2019, Appendix D-8). With the implementation of mitigation measures and the incorporation of these BMPs, construction activities would not adversely affect

visitor or concessioner employee experiences as described in the FMP EA (NPS, 2019, p. II-55); therefore, this issue is dismissed from further analysis.

**Air Quality:** The project area is not located within a nonattainment area, meaning that the air quality meets the National Ambient Air Quality Standards and does not require further progress to be made toward attainment of the standards per the Clean Air Act (NPS, 2019, p. II-54). Project construction may result in a localized production of vehicle exhaust and dust due to construction activities. In line with BMPs outlined in Appendix D of the FMP, a NPS project inspector would monitor construction vehicles hauling material from outside the park to determine if loads should be covered to minimize dust deposition (NPS, 2019, Appendix D-5). Additionally, Glacier Bay is known for its high volume of precipitation, which would minimize emissions and/or dust build-up. By implementing mitigation measures and incorporating BMPs, effects to air quality would be temporary and would not result in adverse effects to visitor or concessioner employee use or experiences as described in the FMP EA (NPS, 2019, p. II-54); therefore, this issue is dismissed from further analysis.

#### **Existing Issues Considered but Dismissed, Section 4, Page 5-7**

**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 from 48 to 56 overnight guest rooms (NPS, 2019, p. II-42) and adequately separating visitor and concessioner employee use areas (NPS, 2019, p. I-24). While acknowledging the potential long-term 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:** Fulfilling a site-specific mitigation specified in the FMP EA (NPS, 2019, p. II-51), the park conducted a geo-technical survey of the proposed site in 2021 confirming adequate soil-bearing capacity and drainage characteristics for construction (Record in Decision File). 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 The project incorporates by reference the implementation of mitigation measures and BMPs from the FMP EA to minimize effects to geological resources and soils (NPS, 2019, Appendix D-1.5), such as the inclusion of 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). As described in the FMP EA, impacts to geologic resources and soils would be minimized through the implementation of these mitigation measures and BMPs (NPS, 2019, p. II-51); therefore, this issue is dismissed from detailed analysis. 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 FMP Section 810 analysis (NPS, 2019, Appendix B) and ~~consequent decisions completed for the FMP EA from which this EA is tiered (see Appendix B, FMP 2019). This project incorporates by reference the 810 analysis~~ consequent decisions completed for which determined the FMP preferred alternative would not result in significant restriction of subsistence uses (NPS, 2019, Appendix B-5); therefore, this issue is dismissed from detailed analysis. The proposed action is consistent with the FMP and no additional analysis is needed.

**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. ~~This project includes specific~~ incorporates by reference mitigation measures and BMPs from the FMP EA to ensure that visitor services are not interrupted as a result of the project or its construction period, including phasing construction to support the continuity of lodge operations and scheduling construction outside of the typical visitor use season when feasible (NPS, 2019, Appendix D-3,4). 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 the implementation of mitigation measures and incorporated BMPs to minimize temporary effects due to construction (NPS, 2019, Appendix D-5), with little potential to impact visitor services, this topic is dismissed from ~~further~~ detailed analysis.

**Wildlife and Habitat:** Native wildlife in the project area include many species of birds, mammals, and invertebrates. Common terrestrial mammals in the Bartlett Cove area include, but are not limited to, black bear (*Ursus americanus*), mink (*Mustela vison*), porcupine (*Erethizon dorsatum*), red squirrel (*Tamiasciurus hudsonicus*), flying squirrel (*Glaucomys sabrinus*), voles (*Microtus spp.* and *Clethrionomys rutilus*), moose (*Alces alces*), and shrews (*Sorex spp.*) (NPS, 2019, p. II-53). This project incorporates by reference the FMP's assessment that construction activities may alter wildlife use such as avoiding the project area. Although some animals may temporarily or permanently relocate to areas outside the project area and the removal of up to 1.5 acres of vegetation would reduce habitat available for species reliant on this type of environment, long-term adverse effects upon local populations would not be expected as there is an abundance of similar habitat adjacent to the project area (NPS, 2019, p. II-54). More than 2,600 acres of similar Sitka spruce/hemlock forest would remain undisturbed from development (*Id.*).

~~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~~) (NPS, 2019, Appendix D-6). 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. Based on the incorporation of mitigation measures and BMPs (NPS, 2019; NPS, 2013), construction activities would not result in adverse effects to wildlife populations or overall habitat; therefore, ~~With little potential to impact wildlife or habitat,~~ this topic is dismissed from further analysis.

### **Alternatives, Section 5, Page 8**

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. The Frontcountry Planning Vision sets guidance to improve lodge employee housing outside of the Historic District and consider a range of alternatives including total rehabilitation or building new structures (NPS, 2019, Appendix A-6). Table 1 presents a detailed comparison of the No Action and Preferred Action alternatives.

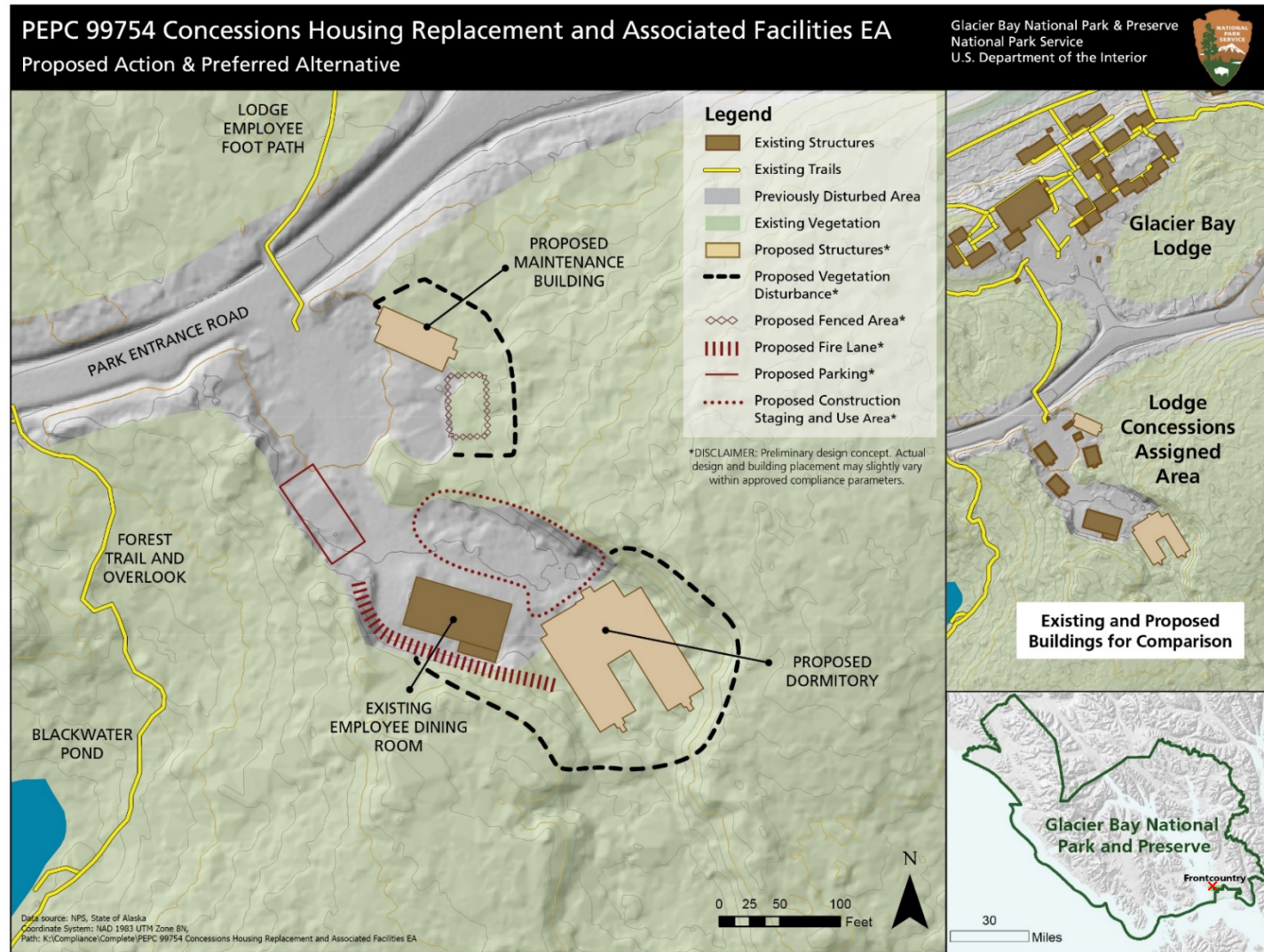
### **Alternatives, Section 5, Page 9, Alternative 2, 1<sup>st</sup> paragraph**

Under Alternative 2, the NPS would replace three deteriorating concessions employee housing units (9,329 sq. ft.) with one two-story consolidated dormitory (~12,600 sq. ft.) located to the east of the Employee Dining Room...

### **Alternatives, Section 5, Page 10, Alternative 2, Figure 4**

The amendment of Figure 4 clarifies locations of proposed parking, maintenance fenced-in staging area, fire access lane, and construction staging and use area. Approximate proposed vegetation disturbance was added surrounding proposed buildings. Labeling of the Area of Potential Effect was removed from Figure 4 and the full disclosure of the archaeological survey and SHPO consultation is available in the decision file.

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



## Alternatives, Section 5, Page 11, Table 1

Clarification to existing and proposed capacity of concessioner employee housing:

**Table 1. Detailed comparison of alternatives.**

| Action                                             | Alternative 1: Existing Conditions (No Action)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Alternative 2: Construct Concessions Employee Housing and Associated Facilities (Preferred Alternative)                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|----------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Construct Concessions Replacement Dormitory</b> | <p>None of the components detailed under Alternative 2 would be constructed. <del>Existing conditions would occur</del> <u>The existing footprint of 9,329 sq. Ft. would continue to occur:</u></p> <ul style="list-style-type: none"> <li>Up to 68 concessioner employees would continue to reside in 3 deteriorated facilities <u>consisting of 24 shared dorm rooms with 1 bath per room (housing approximately 56 employees)</u>, as well as in 8 rooms within Glacier Bay Lodge (<u>housing 8 employees</u>), totaling <u>9,329 sq. ft.</u></li> <li>Shortcomings regarding accessibility, life, fire, and safety would only be addressed sufficient to meet legal requirements. ADA-compliant rooms would remain unavailable.</li> <li>The opportunity to build a facility with sustainable design elements fitted to current staffing levels would not occur.</li> </ul> | <ul style="list-style-type: none"> <li>A new two-story dorm capable of housing up to 68 employees (<u>30 double occupancy rooms, 8 single occupancy rooms, and 4 shared bathrooms</u>) 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> |

## Alternatives, Section 5, Page 12, Table 1

Clarification of standards at which project design would address prevention of pollution due to stormwater runoff:

**Table 2. Detailed comparison of alternatives.**

| Action                                     | Alternative 1: Existing Conditions (No Action)                                                                                                                                                             | Alternative 2: Construct Concessions Employee Housing and Associated Facilities (Preferred Alternative)                                                                                                                                         |
|--------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Modified Utilities and Parking Area</b> | <ul style="list-style-type: none"> <li>Existing utilities would remain in place; parking would continue to be non-delineated; and ADA-compliant parking would be limited to 1 designated space.</li> </ul> | <ul style="list-style-type: none"> <li><u>Proposed parking would be placed where existing housing units are currently located.</u></li> <li>A minimum of 2 ADA-compliant parking spaces would be provided adjacent to the dormitory.</li> </ul> |

| Action | Alternative 1: Existing Conditions<br>(No Action) | Alternative 2: Construct Concessions Employee Housing and Associated Facilities<br>(Preferred Alternative)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|--------|---------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|        |                                                   | <ul style="list-style-type: none"> <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, <u>specifically adhering to the Council on Environmental Quality's 'Guiding Principles for Sustainable Federal Buildings 2020' and 'Technical Guidance on Implementing the Stormwater Runoff Requirements for Federal Projects under Section 438 of the Energy Independence and Security Act' (2009)</u>, 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> |

### **Affected Environment, Section 6, Page 13**

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.~~

### **References, Section 9, Page 16**

Council on Environmental Quality. 2020. CEQ-OFS-2020-1, Guiding Principles for Sustainable Federal Buildings and Associated Instructions, December 2020. Executive Office of the President, Washington, D.C.

Environmental Protection Agency. 2009. EPA 841-B-09-001, Technical Guidance on Implementing the Stormwater Runoff Requirements for Federal Projects under Section 438 of the Energy Independence and Security Act, December 2009. Environmental Protection Agency, Department of Water (4503T), Washington, D.C.

## **Appendix B: NPS Responses to Public Comments**

In response to the public review period for the draft environmental assessment (EA), the National Park Service (NPS) received two correspondences through the Planning, Environment & Public Comment (PEPC) and one correspondence through park email. This appendix offers NPS responses to comments received. The correspondences equated to 30 comments on 13 topics, 23 of which were in support of preferred alternative elements. Seven comments on four topics, although non-substantive, were identified as being of high importance to the public or needing clarification, summarized below.

### **TOPIC #1: DORMITORY DESIGN**

Three comments were received related to the design of the proposed dormitory and associated facilities. There was a request to clarify the intended power systems for new construction, including the use of renewable energy to power heating and electric. Another inquired about safety standards of new buildings, specifically fire-resistant materials and exterior stairways. Lastly, a comment mentioned the 68-employee availability and requested clarification on the ability for expansion in the future.

#### **NPS Response:**

Buildings will meet NPS and other federal requirements for safety, fire protection, accessibility, and sustainability.

Buildings will meet requirements of the 2021 International Building Code (IBC) as well as industry standards for structural, architectural, water, wastewater, electrical, mechanical, and plumbing.

Building design will meet National Fire Protection Association (NFPA) Life Safety Code, Fire Code, Sprinkler System Standard, Fire Alarm Code, and Electrical Code. Design will also incorporate seismic recommendations of the National Institute of Standards and Technology (NIST).

All facilities and routes will incorporate Universal Design principles and meet all requirements of the Accessibility Architectural Barriers Act Accessibility Standards (ABA and ABAAS).

Each building will be designed to be low maintenance and energy efficient reducing overall lifecycle costs, emissions, and fossil fuel use. The buildings will meet sustainable technology standards and guidelines of the American National Standards Institute (ANSI) and American Society of Heating, Refrigeration, and Air Conditioning Engineers (ASHRAE). The concessioner will be responsible for continued maintenance; therefore, sustainable systems will be preferred. Final decisions will be made during the design process.

The park has coordinated with the concessioner throughout the planning process and the proposed capacity for concessioner housing was deemed appropriate.

## **TOPIC #2: TRIBAL CONSULTATION**

One comment requested clarification of the extent to which the park completed Tribal Consultation.

### **NPS Response:**

As described in the EA (NPS, 2021, see *Public Involvement and Agency Consultation*, p. 3), the park initiated and completed tribal consultation with Hoonah Indian Association (HIA) in February 2021. The park will continue to consult with HIA and other tribal representatives as the planning process proceeds to ensure tribal perspectives are adequately addressed.

## **TOPIC #3: INVASIVE SPECIES**

Two comments were received related to the presence and spread of invasive species. One comment suggested a botanical survey would have been more appropriate prior to the completion of the EA. The other comment requested clarification on guidance or protocols for preventing establishment of invasive species in the project area.

### **NPS Response:**

The NPS will conduct a botanical survey prior to construction as directed by the park's best management practices (NPS, 2019); however, the NPS disclosed in the EA there are no priority invasive species within the proposed project area based on subject matter expertise and site-specific scoping (NPS, 2021, p. 13). Additionally, no rare plant species are known in the project area (Nawrocki, 2013).

The NPS considered and included regional and local guidance to minimize the introduction or spread of invasive species within the EA (NPS, 2021, p. 9). Best management practices (BMPs) from the Frontcountry Management Plan (FMP) Appendix D (NPS, 2019), Alaska Region Invasive Plant Management EA (NPS, 2009), and Alaska Exotic Plant Management Protocol (NPS, 2015) will be implemented throughout construction and thereafter to minimize impacts.

## **TOPIC #4: WILDLIFE AND HABITAT**

One comment suggested potential effects to wildlife were not adequately addressed.

### **NPS Response:**

The NPS analyzed potential impacts to wildlife within the EA (NPS, 2021, see *Issues Considered but Dismissed*, p. 6-7) and further analysis was clarified in the FONSI Errata (Appendix A, p. 11-12). The project is located within the developed frontcountry area of Glacier Bay and incorporates by reference the FMP's assessment that construction activities and the removal of up to 1.5 acres of vegetation may alter wildlife use and habitat; however, long-term adverse effects upon local populations would not be expected as there is an abundance of similar habitat adjacent to the project area (NPS, 2019, p. II-54). All construction will be in accordance with state and federal laws and regulations to ensure protection of and minimization of impacts to wildlife.

## REFERENCES

National Park Service. 2009. Alaska Region Invasive Plant Management Plan Environmental Assessment. <https://parkplanning.nps.gov/projectHome.cfm?parkID=1&projectID=15850>

National Park Service. 2015. Alaska Region Exotic Plant Management Geodatabase. <https://data.doi.gov/dataset/akr-exotic-plant-management-epmt-geodatabase>

National Park Service. 2019. Glacier Bay National Park and Preserve Frontcountry Management Plan (FMP). <https://www.nps.gov/glba/learn/management/frontcountry.htm>

National Park Service. 2021. Concessions Housing Replacement and Associated Facilities Environmental Assessment: Glacier Bay National Park and Preserve, Gustavus, Alaska. <https://parkplanning.nps.gov/projectHome.cfm?projectID=99754>

Nawrocki, T. J. Fulkerson, and M. Carlson. 2013. Alaska Rare Plant Field Guide. Alaska Natural Heritage Program, University of Alaska Anchorage. 352 pp.

## Appendix C: Non-Impairment Determination

The NPS Organic Act of 1916 and the General Authorities Act of 1970 prohibit impairment of park resources and values. The NPS Management Policies 2006 use the terms “resources and values” to mean the full spectrum of tangible and intangible attributes for which the park is established and managed, including the Organic Act’s fundamental purpose and any additional purposes as stated in the park’s establishing legislation. The impairment of park resources and values may not be allowed unless directly and specifically provided by statute. The primary responsibility of the National Park Service is to ensure that park resources and values will continue to exist in an unimpaired condition that will allow people to have present and future opportunities to enjoy them.

A determination of impairment is made for each of the resource impact topics carried forward and analyzed in the EA. Impairment is an impact that, in the professional judgement of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those 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

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

An impact would be less likely to constitute an impairment if it is an unavoidable result of an action necessary to pursue or restore the integrity of park resources or values and it cannot be further mitigated.

The Concessions EA (NPS, 2021) incorporates by reference mitigation measures and best management practices from Appendix D of the Glacier Bay Frontcountry Management Plan (FMP) (NPS, 2019) and analysis from the FMP EA where relevant, therefore reducing or eliminating effects to several resources. These topics would not result in impairment to park resources. Topics requiring evaluation for impairment include Sitka spruce/western hemlock forest and the Glacier Bay Lodge Complex Historic District.

### VEGETATION

Vegetation is a component of the fundamental resources and values of Glacier Bay National Park and Preserve. In the selected alternative, up to 1.5 acres of Sitka spruce/hemlock forest will be removed. The actions, however, will not impact forest species at a population level as disturbance will be localized to the construction site, and the species affected are common throughout the 7,000-acre Bartlett Cover frontcountry area. Additionally, the implementation of mitigation measures and best management practices during and after construction activities will help reduce the introduction and

spread of invasive species. Overall, the selected alternative will not result in impairment to this resource.

## **GLACIER BAY LODGE COMPLEX HISTORIC DISTRICT**

This resource is considered a fundamental resource of the park and is a component of the historic sites that contribute to the significance of the park unit. The Glacier Bay Lodge Complex Historic District is eligible for the National Register of Historic Places and the existing concessioner housing units, constructed in the early 1980s, continue to adversely affect the historic viewshed from the lodge main entrance. Removing the existing housing units, strategically placing the new dormitory outside the historic viewshed, and minimizing potential impacts through site design, site placement, and retaining natural vegetative screening will improve the current historic viewshed. Restoration of Historic District viewsheds will assist park efforts to preserve the district's historic setting. Implementation of the selected alternative will not result in impairment to the park's cultural landscapes and historic structures.

## **CONCLUSION**

In conclusion, as guided by this analysis, good science and scholarship, advice from subject matter experts and others who have relevant knowledge and experience, and the results of public engagement, it is the Superintendent's professional judgement that the proposed action will not result in impacts to park resources and values that constitute impairment.

## **REFERENCES**

National Park Service. 2006. Management Policies 2006. U.S. Department of the Interior, National Park Service, Washington, D.C.

National Park Service. 2019. Glacier Bay National Park and Preserve Frontcountry Management Plan (FMP). <https://www.nps.gov/glba/learn/management/frontcountry.htm>

National Park Service. 2021. Concessions Housing Replacement and Associated Facilities Environmental Assessment: Glacier Bay National Park and Preserve, Gustavus, Alaska. <https://parkplanning.nps.gov/projectHome.cfm?projectID=99754>