



United States Department of the Interior

NATIONAL PARK SERVICE

Pacific West Region
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San Francisco, CA 94104



IN REPLY REFER TO:
L7617 (PWRO-P)

21 OCT 2011

Memorandum

To: Superintendent, Lewis and Clark National Historical Park

From: Regional Director, Pacific West Region

Subject: Environmental Compliance for Forest Restoration

The *Finding of No Significant Impact* for forest restoration activities in the Fort Clatsop Unit is approved.

To complete this particular environmental compliance effort, the park should provide notice of the decision to all individuals, agencies, and organizations that received the supporting environmental assessment.


FOR Christine S. Lehnertz

Attachment

FINDING OF NO SIGNIFICANT IMPACT
FORT CLATSOP UNIT FOREST RESTORATION PLAN

Lewis and Clark National Historical Park
October 2011

INTRODUCTION

This Finding of No Significant Impact (FONSI) has been prepared in accordance with the NPS Director's Order 12 for the Fort Clatsop Unit Forest Restoration Plan in Clatsop County, Oregon. The FONSI, along with the EA, comprise the complete record of environmental impact analysis for the project. The Environmental Assessment analyzed three alternatives, the No Action alternative (Alternative 1), Restoration with No Biomass Removal (Alternative 2) and Restoration with Limited Biomass Removal for Research and Adaptive Management (Alternative 3).

This plan only addresses the forest and forest floor within the Fort Clatsop Unit and does not address forests in other park units. These other park units include Dismal Nitch, Station Camp, the Yeon Unit and Cape Disappointment. The National Park Service decided to defer action at these other units for the following reasons:

1. Forests at the Dismal Nitch and Cape Disappointment Units are located on steep slopes and are already much closer to those experienced by the Expedition. They are not in need of immediate or substantial treatment.
2. Forests at the Station Camp Unit are still in private ownership. Management of these forests may be determined by a separate conservation easement and forest plan being negotiated between the landowner and NPS. The timeframe for potential action is currently unknown and not imminent.
3. The shore pine forests at the Yeon property were planted for dune stabilization. Because they are not historic, they do not share the same management objectives as this EA. The part of the Yeon forest that is dead and dying is currently being treated as part of the Fire Management Plan EA, developed in conjunction with this EA. A separate management plan will be developed for the Yeon Unit by the NPS, in collaboration with the North Coast Land Conservancy who holds a conservation easement on the property, in the next few years.

PURPOSE AND NEED FOR FEDERAL ACTION

The purpose of this project is to restore and rehabilitate second and third-growth tree farms within the Fort Clatsop Unit at Lewis and Clark National Historical Park to forests that more closely approximate the structure, ecology, and appearance of forests in 1805-1806. This project is needed now because several of the younger forest stands in the Fort Clatsop Unit are in a critical window where restoration treatment is extremely effective.

In 2005, the park acquired 963 acres of industrial plantations, or tree farms, from the Weyerhaeuser Corporation, increasing the size of the park's forest acreage outside developed areas to approximately 1,000 acres. The lands the park acquired are significantly different in appearance and ecology to unmanaged forest stands experienced by the Lewis and Clark Expedition. The trees within plantations are young, densely stocked and of the same age. Unmanaged stands would have been older, less dense, and contained trees of different ages.

Perhaps the greatest difference between plantations and the historical forest is the forest floor. In plantations, the forest floor is generally kept clear of plants that might compete with target species. As a consequence, the understory of ferns and shrubs, downed trees, thick soils, snags and nurse logs that characterize unmanaged forests is often missing. The Expedition journals describe some of these missing characteristics. They include forest floor so thickly covered with fallen logs, shrubs and ferns, that it is almost impassable. For example, on November 12th, Clark wrote that his hunting party "found the woods so thick with Pine & timber and undergrowth that they could not get through." On December 1, 1805, Lewis remarked that "the wood was so thick it was almost impenetrable."

A substantial body of scientific research suggests that converting stands from tree farms to unmanaged or natural forests requires active and strategic intervention. Without intervention, these stands can remain in the same developmental stage for decades, if not centuries. Research suggests that intervention is necessary to increase structural and biological complexity, introduce greater species diversity, create snags and downed logs, restore forest soils and the forest floor, and create a more natural forest understory. While it is not possible to restore the forests in a generation, treatment can greatly accelerate the conversion from plantation to native forest.

This project is also needed to address the disposition of former roads, tracks, and staging areas that were built during the forest's use as a tree farm.

SELECTED ALTERNATIVES & OTHER ALTERNATIVES CONSIDERED

NPS selects **Alternative 3** for implementation. There are no modifications due to public comment incorporated herein.

The Selected Alternative involves measures to accelerate the restoration of "old growth" characteristics in approximately 1,000 acres of forests within the park's Fort Clatsop Unit. The development of this alternative began with a study and analysis completed in 2007 by the University of Washington School of Forest Resources. The study examined timber stand data for the Fort Clatsop forests and reviewed current literature on forest restoration to develop goals, action and strategies. The park planning team also visited forest restoration projects at Ellsworth Creek Preserve and the adjacent Willapa National Wildlife Refuge and examined plans, treatments, strategies, and compliance documents developed for these locations. The Ellsworth/Willapa project is the largest forest restoration project in the Pacific coastal rainforest and involves forests and issues similar to those at the Fort Clatsop unit.

Under the Selected Alternative, the park will thin 713 acres of the Fort Clatsop Unit. Thinning reduces the number of trees in a stand, and allows the trees that are retained to grow faster and

develop more robust crowns. This results in fewer, larger, stronger trees. Thinning also allows more light to reach the understory, greatly enhancing colonization by ferns, shrubs, mosses and other species.

The restoration thinning will mimic the natural processes of wind throw or individual tree death and create open patches and gaps in the forest. The type and degree of thinning will vary by stand type and will be specified in restoration prescriptions developed for all stands in the project area. In addition to creating gaps and patches, the selected alternative also will create snags for wildlife habitat by girdling trees.

The Selected Alternative permits the removal of thinned materials on up to 290 acres of the 713 acres proposed for thinning. The removal of thinned material (trees, limbs, and cuttings) will be tightly constrained and limited to a treatment within research plots; to stimulate the re-initiation of understory plants if monitoring indicates that biomass removal is necessary to achieve this objective; or to address unanticipated diseases or stand-level impacts due to climate change.

Under the Selected Alternative, the park will also plant under-represented tree species, such as Sitka spruce, western red cedar, bigleaf maple, and yew, all of which are less common now than they were in historic forests.

Other Alternatives Considered and Analyzed

Alternative 1: No Action. Under the No Action Alternative, the park would continue current management actions in the park. These actions include the control of invasive forest plants such as ivy and holly, and the removal of hazard trees from trails and roads. Alternative 1 would not include any restoration actions.

Alternative 2: Restoration with No Biomass Removal. Alternative 2 would allow all of the actions or treatments proposed in the Selected Alternative with the exception of biomass removal. Under Alternative 2, up to 713 acres could be thinned, but all thinned materials would be left in place, chipped, and or scattered. Alternative 2 would restore the park's forests if conditions remain static and if there are no changes in disease frequency and occurrence, stand growth or other factors due to climate change. Climate change could bring more frequent and stronger storms, a greater risk of disease, or changes in seasonal rainfall; therefore, Alternative 2 does not best meet the plan's goal of adaptively managing the resources. Alternative 2 would also not allow biomass removal for research.

Other Alternatives Considered and Dismissed

In addition to the options selected for analysis, four other alternatives were considered but ultimately rejected from further consideration.

Dismissed Alternative 1: Treat only areas adjacent to trails and other visitor facilities. In the long-term, this alternative would have maximized the visitor perception of being in an old-growth forest but would have caused considerable disruptions to the visitor experience in the short term. This alternative would have treated only a small portion of the unit. Many areas that would have benefited from thinning would be left in an impaired state.

Dismissed Alternative 2: Treat only areas protected from wind storms. Consideration was also given for an alternative that limited treatment to sheltered areas most likely to mature into old-growth. This alternative would have mimicked one pattern seen in coastal areas where the oldest forests are found in areas protected from wind and other disturbances. However, limiting treatment to only a small portion of the landscape would have left much of the park still more closely resembling a production forest and would not have met a number of key restoration objectives.

Dismissed Alternative 3: Remove biomass to defray costs of treatment. Another alternative considered was utilizing a more traditional timber-harvesting method in which the majority of thinned trees would be removed off-site. This treatment is used at the Nature Conservancy's Ellsworth Creek Preserve, the Willapa National Wildlife Refuge and Redwood National Park in order to defray the costs of treatment. This alternative was dismissed because the use of harvest machinery in the small and heavily visited Fort Clatsop Unit would unnecessarily disrupt the visitors' experience. In the small unit, it is feasible to restore the forest without biomass removal.

Dismissed Alternative 4: Remove wind thrown trees to assist with regeneration. This alternative was proposed by a few attendees at the scoping meeting for the concurrent fire plan. Two of the attendees had seen the small microburst acres of wind thrown trees from the 2007 storm and thought that removing material in the wind throw area, a common practice on industrial timber lands to recover marketable wood and enhance regeneration, would help with replanting desired species such as cedar and spruce. This alternative was considered, but ultimately dismissed. Removing biomass in wind throw areas would perpetuate undesired dense, even-aged hemlock stands. Removing windthrown biomass could also greatly delay or interfere with restoration of the forest floor.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The National Park Service (NPS) has determined that the environmentally preferred alternative for this project is Alternative 3. The environmentally preferred alternative is the alternative that will promote the national environmental policy expressed in NEPA (sec. 101 (b)) and includes alternatives that:

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

- Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

The Council on Environmental Quality Regulations (CEQ) regulations implementing NEPA and the NPS NEPA guidelines require that “the alternative or alternatives which were considered to be environmentally preferable” be identified (Council on Environmental Quality Regulations, Section 1505.2). Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative that best protects, preserves, and enhances historic, cultural, and natural resources.

Alternative 3 is the *Environmentally Preferred Alternative*. Alternative 3 will fulfill NPS’ responsibilities as a trustee of the environment by restoring the historical and natural landscape and local ecosystems through specific applications of science-based restoration treatments. These treatments would include thinning to create gaps and patches, snag creation, “seeding” of fungal spores, and planting of under-represented species, among other actions. It is anticipated that these actions would create forests representative of those experienced by the Clatsop people and the Lewis and Clark Expedition. It is expected that these forests would be similar to forests found in natural areas today that have never been harvested or manipulated.

Alternative 1, the No Action Alternative, was not selected because it would fail to restore the natural and historic conditions of the Fort Clatsop forests. Under Alternative 1, the park would continue current management actions in the park. These actions include the control of invasive forest plants such as ivy and holly, and the removal of hazard trees from trails and roads. Alternative 1 would not include any restoration actions. While an analysis of Alternative 1 concluded that the Fort Clatsop Unit’s forests might restore themselves over time, there is also a significant chance that unnaturally dense hemlock stands would remain in an early developmental phase and fail to reach a late successional state characteristic of historic, unmanaged forests.

Alternative 2, Restoration without Biomass Removal, was also not selected. Under Alternative 2, up to 713 acres could be thinned, but all thinned materials would be left in place, chipped, and or scattered. Alternative 2 would restore the park’s forests if conditions were to remain static and if there were no changes in the environment due to climate change. Climate change could bring more frequent and stronger storms, a greater risk of disease, or changes in seasonal rainfall. If conditions become very different due to climate change, Alternative 2 would limit the range of actions the park could take to mitigate these conditions. Alternative 2 would also not allow biomass removal for research purposes, such as to investigate the impact of heavy wind throw on shrub regeneration and forest floor restoration.

Decision Rationale

Alternative 3 (the Agency preferred alternative and the environmentally preferred alternative) is the selected course of action because it best meets forest restoration goals in the Ft. Clatsop Memorial Expansion Act (P.L. 107-221) and the park’s 1995 General Management Plan. This alternative can be implemented without any major adverse impacts to air quality, soils, vegetation, wildlife, threatened and endangered species, historic and cultural resources, visitor experiences, park operations, and soundscape.

There were no highly controversial effects identified during either the preparation of the environmental assessment or the public review period, and the impact analysis has not been highly debated. The nature of this project is such that it does not involve highly uncertain, unique or unknown risks. The available information on which to base this decision is adequate.

The NPS followed required compliance processes to ensure that this project does not violate any federal, state, or local environmental protection laws or requirements.

MITIGATION

In areas where there is the potential for short- term or long-term adverse effects, mitigation measures will be used to avoid or minimize negative impacts. Mitigation measures include best management practices (BMPs). BMPs required for implementation are listed below:

Resource Area	Mitigation	Responsible Party
General Considerations	<ol style="list-style-type: none"> 1. All work will comply with agency required permits and their conditions. 2. Wind and fire will be recognized as natural agents. Trees killed by wind throw or fire will not be removed, unless necessary for safety near roads, buildings or other critical facilities. 	NPS LEWI Natural Resources Specialist.
Geology, Soils, Topography	<ol style="list-style-type: none"> 1. Any mechanical treatments will use existing roadbeds, skidder trails and landings to the extent possible. 2. Any equipment operation will not be permitted from October 1 to May 1 or at any time when soils are saturated and prone to compaction. 	NPS LEWI Natural Resources Specialist.
Water Quality	<ol style="list-style-type: none"> 1. A 300 foot buffer will be observed around streams and wetlands. No heavy equipment use or log-yarding will be allowed in the buffer. 2. Existing roadbed stream crossings would be removed when no longer necessary. 	NPS LEWI Natural Resources Specialist.
Plants and wildlife	<ol style="list-style-type: none"> 1. Prescriptions would limit the number of standing trees damaged by thinning to 5 per acre. Prescriptions would prohibit the damaging of trees greater than 20 inches DBH. 2. Chain saw oil would be "seeded" with fungal spores to encourage colonization by desirable fungal species and discourage undesired species. 	NPS LEWI Natural Resources Specialist.
Cultural Resources	<ol style="list-style-type: none"> 1. The park cultural resources manager or a designated representative would conduct an inspection and develop a plan to protect any existing or new cultural resources identified before and after treatments. 2. Consultation requirements for individual undertakings associated with these plan will be addressed on a case-by-case basis for compliance with Section 106 of the National Historic Preservation Act. 	NPS LEWI Chief of Resources.

Resource Area	Mitigation	Responsible Party
Visitor Experience	<ol style="list-style-type: none"> 1. Mechanical treatments would be scheduled prior to June 15 or after September 1 to avoid periods of heavy visitation. 2. Trees near trails and other visitor facilities would be pulled over with a grip hoist to mimic natural wind throw. 	NPS LEWI Natural Resources Specialist.

PUBLIC INVOLVEMENT AND AGENCY CONSULTATION

Scoping

Initial research and development for this project was begun in 2006. Based on this, a draft restoration plan was written and on February 1, 2007, a press release seeking public comments on the draft plan was sent to the local media. Emails and hardcopies of this request for comments were also sent out to interested individuals, organizations, and agencies. The scoping effort was also featured in an article in the Daily Astorian on February 4, 2007.

A total of six written comments were received: one from a local watershed council, two from state agencies, and three from individuals. Five of the comments were supportive of the plan to re-establish a native coastal forest. One comment was not relevant and was an inquiry about the history of a parcel that is not within the park boundary or in the scope of the plan. One commenter's concerns about possible impact on streams are addressed in the plan through the use of riparian buffer zones in all action alternatives.

The following issues were raised during the public scoping and written comment period. All issues identified in scoping were given equal consideration during development of the environmental assessment and possible alternatives.

- A well thought-out plan to manage the forests in the Fort Clatsop unit.
- Scarcity of late-successional forest in the current landscape has led to a decrease in biodiversity and habitat availability for species that historically were abundant in the area.
- The restoration of the natural landscape including vegetation and wildlife habitat degraded by past management activities.
- Protection of natural resources including air, water, soil, plants and animals.
- Fires, including prescribed fires, and their potential spread onto adjacent private land.
- Protection of cultural resources, and inclusion of Native American tribes in archaeological and conservation activities.
- Safety of visitors, staff, and adjacent property owners.
- Effects on visitor use.

- Preservation of the wilderness qualities found within the park.
- The cumulative effects of actions proposed in management with respect to potential watershed and landscape level impacts.
- Maintenance of wildlife habitat in both the short and long term within the context of proposed actions.
- Loss of elk habitat in the region as human development encroaches on areas used by elk.

Public EA Review

A windstorm with hurricane-force winds hit the park and surrounding area during December 2007 resulting in patchy but significant blowdown in the project area. Further research into how this event would affect reforestation, combined with staff turnover, resulted in a delay of the EA.

After the EA was completed, it was made available for public review and comment during a 30-day period from May 6, 2011 to June 6, 2011. Public notice of the availability of the EA was provided to individuals, organizations, and agencies through notification on the park website (www.nps.gov/lewi) and park planning website (parkplanning.nps.gov/lewi). A total of five printed copies of the EA were made and left for review at each of the following locations: NPS park headquarters, Astoria Public Library, Warrenton Community Library, and Seaside Public Library. A guest column on the Fire Management plan and Fort Clatsop Unit Forest Restoration Plan was written by the park superintendent and published in the Daily Astorian on May 12, 2011. Press releases were published in the local newspapers inviting the public to review the completed EA at public meetings held May 24, 2011.

The public meeting was attended by 7 private citizens. Comments received at the meeting were positive. One question was asked about species that will be planted for diversity, which will be primarily spruce, cedar, bigleaf maple, and yew. One question was asked about the equipment used for thinning operations, which will be hand crews with chainsaws. One commenter encouraged the park to monitor any stream culverts under forest roads; most old timber roads are not near streams, but the one under the roadbed that forms part of trail A will be monitored.

One on-line written comment was received during the 30-day comment period. The commenter supported the forest restoration plan in general, but only supported trails necessary for park administration, not for public use. The commenter did not provide any justification for limiting visitor access. This suggestion was considered but dismissed because limiting visitor access to the forest does not meet the plan's objective of increasing public understanding of forest ecology and forest restoration activities.

Agency Consultation

U.S. Fish and Wildlife Service

NPS initiated consultation with the U.S. Fish and Wildlife Service in February of 2007. On May 6, 2011, NPS sent copies of the Environmental Assessment to USFWS and requested concurrence with a finding of "no effect" on threatened and endangered species. In phone calls and a subsequent email on June 20, 2011, the U.S. Fish and Wildlife Service concurred with the

NPS finding of no effect, but deferred to the National Marine Fisheries Service about the impact to listed salmon species.

National Marine Fisheries Service

On June 6, 2011, NPS sent a copy of the Environmental Assessment to the National Marine Fisheries Service (NMFS) and requested informal consultation for threatened and endangered salmon species. On July 5, 2011 NMFS requested further information about the proximity of work to streams. On September 6, 2011, NMFS concurred with NPS' determination that all effects of the selective alternative were not likely to adversely affect listed salmon species or critical habitat.

State and Tribal Historic Preservation Officers

On May 6, 2011, NPS sent a formal request for concurrence with a finding of no adverse effect on historical and cultural resources and copies of the Environmental Assessment to the Oregon State Historic Preservation Office, Clatsop-Nehalem Confederated Tribes, Confederated Tribes of Siletz Indians, Confederated Tribes of the Grand Ronde and the Chinook Indian Nation. The Oregon SHPO responded with a letter on May 25, 2011 concurring with the finding of no adverse effect on historical and cultural resources.

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

NPS used the following NEPA criteria and factors defined in 40 CFR §1508.27 to evaluate whether the Selected Alternative would have a significant impact on the environment.

Degree of effect on Public Health or Safety.

This plan will reduce the public health and safety risk due to wildfire. This plan prescribes thinning forests to help accelerate the development of late successional or old-growth characteristics. One result of thinning will be a drastic reduction in standing fuel loads, as well as ladder fuels. Safety risks associated with forest management activities will be mitigated through established safety precautions.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.

This project will re-create forests that more closely approximate the structure, ecology, and appearance of forests experienced by the Clatsop people and the Lewis and Clark Expedition in 1805-1806. Restoring these forests will help to re-create the historic scene surrounding the Fort Clatsop site and to re-establish the ecology of the Pacific coastal rainforest.

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

Though the management of public and private production forests in the region is the subject of public debate, forests on park lands and tourism destinations, including the Fort Clatsop unit, appear to be viewed very differently. Neighbors, foresters and partners attended the EA scoping and review meetings. All comments were supportive of all aspects of the plan, including

restoration activities and conversion of roads to trails with only one anonymous e-mailed comment opposed to public use of the trail and road network.

Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks.

Forest treatments might temporarily exclude park visitors from trails, although these closures would be scheduled to minimize impacts to visitors. Treatments may temporarily impact the view shed of the area, thereby creating negligible short-term adverse effects. However, over the long term, the project will have a net beneficial effect on environment and view shed.

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

There will be no unacceptable cumulative effects. This plan was completed concurrently with the park's fire management plan, which was designed to complement the forest restoration planning for the Fort Clatsop Unit. For example, rather than pile burning in the Fort Clatsop Unit, the fire crews will scatter thinned material on the wet ground when possible. This will aid replenishment of forest soils that may have been depleted after several rotations of commercial timber operations that took place on this recently acquired park unit. Stands in the Fort Clatsop Unit that are thinned under the Forest Restoration plan will also help to reduce the risk of catastrophic wildfire. Trails created as part of the Forest Restoration Plan will provide quicker and safer access for crews to conduct manual thinning operations and in the event of a wildland fire. The Forest Restoration Plan outlines thinning on 713 acres of the forest; the specific prescriptions written for this forest restoration will include 30 acres of thinning being performed under the Fire Management Plan. This complementary planning effort was explained at the public meeting (noted above).

Both Environmental Assessments were submitted simultaneously to state and tribal historic preservation offices and the U.S. Fish and Wildlife Service so the agencies could evaluate them concurrently.

Potential restoration at the Station Camp unit was not included because while the land is within the park's legislative boundary, it is currently in private ownership. The timeframe and scope of any future restoration in this area is currently unknown.

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

No adverse affects are expected to historic districts, highways, structures or objects listed on the National Register of Historic Places. Prior to any forest management activity that involves ground disturbance, cultural resources in treatment areas would be surveyed, identified and avoided.

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

No adverse affects are expected to endangered or threatened species or critical habitat. A300-foot buffer will be established surrounding all salmon-bearing streams. No ground disturbance nor equipment will be allowed within this buffer.

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

All permits will be obtained prior to construction and no violation of Federal, state or local environmental protection laws will occur knowingly.

IMPAIRMENT

The National Park Service has determined that implementation of the Selected Alternative and mitigation measures will not constitute impairment to Lewis and Clark National Historical Park's resources and values. There will be no major adverse impacts to a resource or value whose conservation is 1) necessary to fulfill specific purposes identified in the park's establishing legislation; 2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or 3) identified as a goal in the park's general management plan or other relevant NPS planning documents. This conclusion is based on a thorough analysis of the environmental impacts described in the Fort Clatsop Unit Forest Restoration Environmental Assessment, the mitigation measures, agency consultations, considerations of the public comments received, relevant scientific studies, and the professional judgment of the decision-maker guided by the direction in NPS Management Policies.

CONCLUSION

Implementation of the Fort Clatsop Unit Forest Restoration project as described above will not have significant impacts on the human environment. The determination is sustained by the analysis in the EA, agency consultations, the inclusion and consideration of public scoping comments overall, and the capability of mitigations to reduce or avoid impacts. Adverse environmental impacts that could occur are negligible to minor in intensity, duration, and context. As described in the EA, there are no highly uncertain controversial or unacceptable impacts, unique or unknown risks, significant cumulative effects, or elements of precedence. There are no previous, planned, or implemented actions, which in combination with the selected alternative would have significant effects on the human environment. Requirements of the National Environmental Policy Act have been satisfied and preparation of an Environmental Impact Statement is not required. The park will implement the Selected Alternative as soon as practical.

Recommended:

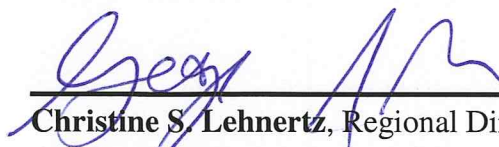


**David Szymanski, Superintendent
Lewis and Clark National Historical Park**

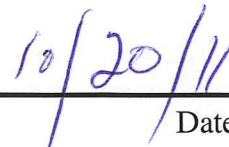


Date

Approved:



**Christine S. Lehnertz, Regional Director
Pacific West Region, National Park Service**



Date