



**National Park Service
US Department of the Interior**

**FINDING OF NO SIGNIFICANT IMPACT
National Park Service
Employee Housing Projects
Environmental Assessment
PEPC 132210**

Approved:

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FINDING OF NO SIGNIFICANT IMPACT

1.1 INTRODUCTION

In compliance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code 4321 et seq), the National Park Service (NPS) prepared an Environmental Assessment (EA) to examine alternative actions and environmental impacts associated with repairing, rehabilitating, or remodeling existing National Park Service employee housing units or constructing new housing units. As stated in the EA, “[m]any park housing units are in dire need of renovation or replacement to address maintenance needs, comply with modern safety codes, and better meet employee needs.” The purpose of the project is to provide adequate housing for parks staff. In developing an EA, the NPS will fulfill its commitment to preserve and protect the natural, cultural, and recreational resources as stated in the purpose of each park unit.

The statements and conclusions reached in this Finding of No Significant Impact (FONSI) are based on documentation and analysis provided in the EA and associated decision file. Relevant sections of the EA are summarized and incorporated by reference below. The EA is available on the NPS Planning, Environment and Public Comment (PEPC) project site at <https://parkplanning.nps.gov/employeehousing>.

The public was provided with the opportunity to comment during the planning process. The NPS held a 30-day public scoping period from September 22 to October 22, 2025, following initiation of the NEPA planning process. The NPS received 8 unique pieces of correspondence during the public scoping period. The comments received were reviewed by the NPS and considered in developing the EA.

A summary of public comments received is provided in Attachment A, Responses to Substantive Comments. Modifications to the text of the EA are provided in Attachment B, Errata.

1.2 SELECTED ALTERNATIVE AND RATIONALE FOR DECISION

1.2.1 SELECTED ALTERNATIVE

The NPS analyzed two alternatives in detail in the EA including the no-action alternative. Based on this analysis, the NPS selected Alternative 2, the proposed action, as the alternative for implementation because it best meets the purpose of, and need for, action, without causing significant or unacceptable impacts on park unit resources. The selected alternative is described in detail in Chapter 2 of the EA and is incorporated by reference here.

As described in the EA, the selected alternative includes project activity types that a park unit could implement under the EA. Impacts from these actions were broadly analyzed in the EA based on what was known or could be reasonably assumed at the time of preparation of the EA. Once a given park unit determines the needs for their housing supply, the specific location and scope of potential actions will become apparent. Once the scope and design are sufficiently developed for site-specific actions, additional project-level environmental and cultural review, analysis, and compliance would be completed as appropriate prior to implementation.

1.2.2 Rationale

The selected alternative best meets the purpose and need for the action because it provides the most effective and feasible long-term plan to address employee housing needs in a manner consistent with relevant laws, regulations, interagency agreements, and policies. The selected alternative meets 9.4.3 of *NPS Management Policies 2006* which states that “[i]f reasonable price and quality housing is not available in the private sector, the Service will provide...the number of housing units necessary to support the NPS mission.” Under the selected alternative, the NPS will fulfill its commitment to preserve and protect the natural, cultural, and recreational resources as stated in the purpose of each park unit.

The NPS considered one other potential alternative, but dismissed it from further analysis as described in Chapter 2.1 of the EA.

1.2.3 Changes to the Selected Alternative

No changes to the EA are proposed as a result of public comments. However, minor changes, or errata, have been incorporated to further clarify the EA.

1.3 Purpose and Need for Action

Enumerated need 3 has been modified to add “for human health and safety” to the end of the sentence.

2.3 Best Practices:

“[T]ypically” has been removed from the first sentence and “where practicable” added after “followed.”

Appendix A:

The following has been added as a dismissed topic:

Human Health and Safety

One of the objectives of the proposed project is to reduce the risk to human health and safety by addressing health and safety code issues at park housing which will result in beneficial impacts to human health and safety. Therefore, the topic of human health and safety was dismissed as a resource topic from further analysis.

1.3 BEST MANAGEMENT PRACTICES

The NPS places strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. The EA did not identify any “national-level” impacts that would occur to resources across the National Park System as a result of implementing the selected alternative. As noted above, before existing housing units in a park system unit are repaired, rehabilitated, or remodeled, or new housing units are constructed, analysis is required. The NPS will implement site specific best management practices to protect vegetation, wildlife, archeological resources, and cultural landscapes and historic structures, wildlife/threatened and endangered species, vegetation, soils, wilderness, and water resources. Examples of common best management practices are described in detail in Chapter 2 of the EA and are hereby incorporated by reference but the applicability of these best practices will depend on the site specific needs and whether other options are warranted.. The NPS has the authority to require mitigation under the Organic Act of 1916 (54 USC 100101 et seq), the Wilderness Act of 1964 (16 USC 1131 et seq), the National Historic Preservation Act of 1966, as amended (54 USC 300101 et seq), the Endangered Species Act, as amended (16 USC 1531 et seq), NPS Management Policies 2006, and other federal and state applicable requirements.

1.4 SIGNIFICANCE CRITERIA REVIEW

1.4.1 Potentially Affected Environment

The potentially affected environment is the National Park System, at a System-wide scale. The National Park System includes 433 individual units covering more than 85 million acres in all 50 states, the District of Columbia, and US territories including national parks, national monuments, national seashores, national battlefields, and national recreation areas, among others.

To evaluate the potential for significant impacts, agencies consider the setting, or potentially affected environment in which impacts may occur. In this case, the selected alternative may beneficially or adversely impact vegetation, wildlife, archeological resources, and cultural landscapes and historic structures. Many park units do not provide employee housing and therefore cannot implement the selected alternative. Because the National Park System is geographically and environmentally diverse, it includes varied environments with regard to vegetation, wildlife, archeological resources, and cultural landscapes and historic structures.

A number of different vegetation types will be impacted by the selected alternative. Many park units feature overlapping types of vegetation due to their diverse landscapes and climates. In general, alpine, coastal, desert, forest and woodland, grassland, mountain wetlands, temperate rainforest, and tropical rainforest vegetation types may be impacted.

National Park System units span across different types of environments, including deserts, coasts, forests, mountains, and prairies, which host a diverse array of wildlife species. Each park unit includes unique ecosystems that support a variety of habitats for its resident wildlife, playing an important role in conservation efforts. Wildlife in park units include invertebrates, amphibians, fish, reptiles, birds, and mammals.

Archeological resources are the material evidence of human culture and activity in the past. They include artifacts, features, sites, and associated documentation. A wide variety of archeological resources exist in national park units, from Native American villages to early colonial settlements, from the homes of presidents and poets to battlefields and shipwrecks.

The majority of national park units contain cultural landscapes. These landscapes are places within the parks that have significance in American history and authenticity to a historic time period. They vary broadly from historically designed, to agricultural, industrial, ceremonial, and spiritual places. There are more than 800 cultural landscapes throughout the National Park System. Historic structures include buildings, monuments, dams, millraces and canals, stockades and fences, defensive works, temple mounds and kivas, and ruins of these and other structural types.

Please refer to section 1.4.2 for a more detailed description of the potential effects of the selected alternative on each of the resources discussed in the potentially affected environment

1.4.2 Degree of Effects of the Action

The NPS considered the following actual or potential project effects in evaluating the degree of effects for the selected alternative.

Beneficial and Adverse, and Short-term and Long-term Effects of the Selected alternative

No significant impacts to resources were identified in the EA that would require analysis in an

Environmental Impact Statement (EIS). Whether considered individually or as a whole, the impacts of the selected alternative, including direct and indirect, do not reach the level of a significant effect because most adverse impacts associated with implementation will be minimal or temporary, lasting only as long as actions are being executed. Best management practices as mentioned above (and described in detail in Chapter 2 of the EA) will further minimize any potential adverse impacts.

Vegetation

The various activity types proposed under the selected alternative may impact vegetation. Ground-disturbing activities such as underground utility replacement, wetland delineations, geotechnical investigations, site grading, and foundation work all will remove vegetation. Even where ground disturbance is not needed, clearing of vegetation around structures may be needed to allow vehicles, people, and machinery to access the structures. In these cases, vegetation may need to be removed or may be otherwise damaged or cause damage to the structures. Installation or expansion of hard surfaces such as sidewalks and roadways may permanently remove vegetation. These hard surfaces can also modify other site conditions such as surface water movement and infiltration as well as localized changes to air and soil temperatures.

Renovation of existing buildings would impact areas of existing ground disturbance, although the disturbance footprint may be expanded to accommodate staging areas and movement of machinery or new infrastructure such as replacing utility lines, sidewalks, or roads to improve access to structures. Structure removal may likewise take place on an expanded footprint of previous disturbance. Construction of new housing units will require a new ground disturbance footprint which may extend to about two acres of disturbance. Adverse impacts on vegetation resulting from housing projects, including new disturbance, will be managed by incorporating sustainable design features, impact avoidance protocols, and post-construction vegetation restoration.

Redesigning existing housing units and constructing new ones may increase the number of employees living in a given housing area. While it is possible that this would lead to an increase in direct impacts on vegetation, the impacts are expected to be controlled as pathways and roads are provided for housing units. This infrastructure will allow for movement of people and vehicles without increasing impacts on vegetation.

Ongoing maintenance of housing areas, including revegetation and landscaping as well as actions of individual park staff, will continue to impact vegetation around proposed housing projects.

Loss of vegetation may reduce a habitat's biodiversity by removing food and shelter for species. Vegetation loss also effects non-wildlife resources and increases sediment runoff to water bodies, changing water chemistry and altering the physical landscape (Dosskey 2010). Loss of vegetation may increase opportunities for invasive and non-native plant species to be introduced or expand within an ecosystem, further eroding native ecosystem health (Hejida 2009). These effects may be managed and controlled by using various standard construction best practices. For example, cleaning and inspecting equipment and materials before they enter a park reduces the likelihood of introducing new non-native plants into an area; the use of construction matting to distribute the weight of construction equipment may reduce compaction that would otherwise reduce the ability of vegetation to regrow; and use of park-approved seed mixes may encourage the regrowth of native and historic vegetation in disturbed areas.

Increases in hard surface area may modify other site conditions such as surface water movement and infiltration (Ragab et al. 2003) and may cause localized changes to air and soil temperatures (Shamsispour et al. 2013).

Impacts on vegetation from housing projects are typically confined to vegetation on and around project sites and do not have a geographic or shared ecological nexus to vegetation in other areas of the park or other park units. Furthermore, project work on existing housing sites has not resulted in collective impacts on vegetation across the national park system. Adverse impacts on vegetation resulting from housing maintenance projects are mitigated by using park-established vegetation management procedures.

Wildlife

Under the selected alternative, structural work, utility repairs, structure removal, structure replacement, and new housing construction would result in surface disturbance as well as anthropogenic noise and activity. These results may impact habitat or cause temporary displacement of wildlife and modification of wildlife behavior in the immediate vicinity of project sites. Impacts on wildlife may include: habitat loss and fragmentation, pollution, disrupted behavioral patterns, and mortality. The preferred alternative will not impact ESA-designated or ESA-proposed critical habitat because project areas with critical habitat are excluded from using this environmental assessment per the LOAs in Chapter 2.2. Sudden changes to an environment, such as those associated with construction, are likely to result in immediate changes in wildlife activity, including individuals moving to areas away from the changes. These individuals may return to an area once disturbances stop. Ongoing changes, including loss of habitat, new sources of light and/or noise, or new food sources (garbage) may push wildlife away from an area, or conversely attract different wildlife to an area.

Habitat loss and modification is addressed under the vegetation section. Areas around existing housing may provide habitats for wildlife including foraging, denning, breeding, and migration habitat. Changes to these habitats may result in temporary displacement, modified behavior, and increased interactions with humans. Projects within established housing areas will require vegetation clearing around the structures (within approximately 50 feet). Wildlife in these areas, which already experience disruption from human activity, are likely habituated to human presence. New housing projects requiring site grading and vegetation clearing may be located outside of an established housing area. These projects have the potential to result in increased habitat loss and modification. The LOA in Chapter 2.2 that limits infrastructure improvements to approximately one quarter mile was established in part because this limits the application of this EA to areas near existing housing and other development to control the effects of habitat loss and fragmentation. During construction, areas of around two acres may require clearing to allow for grading and installation of utilities and foundations and will require revegetation after completion to re-establish habitat. Revegetation post-construction is used to re-establish and improve habitats, stabilize sites, and to mitigate overall loss of habitat. Some wildlife mortality could result from interactions with vehicles and machinery during the construction process, but wildlife avoidance measures would be incorporated into contract specifications and other best practices during implementation.

Construction activities may result in temporary displacement of wildlife and modification of wildlife behavior in the immediate vicinity of the site. Impacts depend on a variety of factors such as the species present, the intensity and timing of construction, and the behavior of personnel working on the site. Wildlife may avoid active construction sites and then quickly recolonize the area after project completion when there is no more intrusive noise and activity. Wildlife may also habituate to frequently repeated disturbances depending on the species, habitat, and predictability of the time and location of activity. Habituated wildlife may experience few or no impacts from construction activities. On the other hand, in areas where wildlife is not habituated to anthropogenic noise and activity or is unable to habituate, disturbance from construction activities would be unexpected and may cause greater adverse impacts. Wildlife displaced by construction activities on new housing areas may not be able to recolonize later if their habitat is no longer available or if they permanently avoid new human activities and associated noise.

Impacts on wildlife from construction projects are typically confined to areas on and around project sites and do not have a geographic or shared ecological nexus to wildlife in other areas of the park, or in other park units. Adverse impacts on wildlife resulting from housing construction can be controlled by timing construction work to avoid sensitive times of the year such as breeding seasons; and by incorporating design and construction features that protect and/or benefit wildlife and wildlife habitat, including (but not limited to) avoiding disturbance to vegetation, selecting native pollinator species when revegetating, minimizing intrusive lighting, and using exclusion measures to prevent birds, bats, and other species from entering and nesting in buildings, especially during construction.

Noise impacts on wildlife can take many forms, including temporarily impairing essential behaviors, altering use and activity patterns, increasing stress response, decreasing immune response, reducing reproductive success, increasing predation risk, degrading communication, and, if the sound is sufficiently loud, damaging hearing (Bowles 1995, Larkin et al. 1996). These impacts can occur as a result of temporary, even singular, events, or from on-going and continuous noise.

Noise from construction activities will occur, especially where heavy machinery is used. The noise impacts may result in wildlife avoiding the area. The impacts can be controlled by confining use of heavy machinery to times of day and year when it is less likely to impact wildlife. Noise impacts associated with construction are temporary in nature and wildlife is likely to return to an area once construction has stopped.

Noise pollution associated with human activity is expected in and around park housing. This includes voices, electronics, vehicles, and other disturbances. It is predictable that this noise will affect wildlife within the immediate vicinity of housing. As the size and density of human activities increase, species that are not acclimated to human interactions are likely to move further away from the area (Nellemann et al. 2010). Projects within existing housing areas will be similar to the existing disruption. New housing outside of an existing housing area will spread this pollution and increase the impacts on wildlife. The one quarter mile limit on infrastructure improvements under this EA keeps these new housing projects close to existing noise sources, managing the level of increased noise pollution associated with new housing projects.

Dark skies compliant lighting is a common feature in national parks as a means of minimizing light pollution, as are the use of black out shades to control indoor lighting impacts on wildlife. However, some exterior lighting is necessary to improve the safety of construction workers and residents, and as such, impacts will occur.

Pollution in the form of garbage is an on-going and growing concern for national parks. Housing area design takes waste management into consideration, including the provision of wildlife-safe garbage containers in areas where wildlife may access them. Construction projects produce additional waste that must be managed to prevent impacts on wildlife. Projects within existing housing areas will have access to existing waste management infrastructure. Changes to housing will require consideration of existing systems and whether they need to be modified if increased garbage generation is anticipated. New housing developments have a higher potential for introducing new garbage pollution into wildlife habitats. However, the one quarter mile limitation on infrastructure improvements under this EA (see the LOAs in Chapter 2.2) reduces this potential for impacts by keeping new housing units close to existing sources of garbage at existing housing units.

Construction waste and debris is managed through established construction management practices. These practices are intended to minimize the amount of fugitive garbage produced by construction activities.

Archeological Resources

Interior redesign of existing buildings and interior and exterior modifications will likely have little to no impact on archeological resources, provided that equipment staging areas are carefully chosen to avoid surface deposits. Planning studies such as geotechnical studies that support project design will cause limited ground disturbance due to the focused nature of the investigations, and thus very little potential to negatively impact archeological resources. Support and utility infrastructure installation, structure removal, and construction of new structures will all involve ground disturbance, including the potential for installing piles that penetrate deeper into the ground, and therefore have the potential to negatively impact archeological resources.

At any given park, impacts on archeological resources will be avoided or minimized through several strategies. The LOAs described in Chapter 2.2 would be applied to ensure that the project site has no rare or sensitive archeological sites. The best practices described in Chapter 2.2 will be applied to avoid or minimize impacts on archeological resources before and during project implementation. Archeological survey as part of the NHPA Section 106 review process at the earliest stages of the project design phase (if a viable survey has not already been conducted) would ensure that there are no rare or sensitive archeological sites in the project area per the LOAs and would inform avoidance or mitigation strategies if other archeological sites are discovered. These LOAs and best practices would avoid or substantially limit adverse impacts on archeological resources.

Any impacts on archeological resources under the preferred alternative would be localized, such that impacts on one site or park would not be expected to compound impacts at other sites or parks. Once a park's housing project is complete, it is not anticipated that there would be ongoing impacts on archeological resources.

Cultural Landscapes and Historic Structures

Almost all projects under the preferred alternative are likely to cause impacts on historic properties from the Mission 66 era. Housing units that predate 1945 exist throughout the national park system but are far less common and may also be impacted by housing projects.

This analysis is based on guidelines for assessing potential impacts on Mission 66 properties from Carr et al. (2015).

Planning studies associated with housing projects are expected to have a neutral impact on Mission 66 properties since the impacts are limited to small areas of ground disturbance.

Installing utilities and other infrastructure may cause a negative impact on Mission 66 properties if historical utilities are removed or replaced, or if new above-ground utilities or other infrastructure (e.g. a new parking area) are added within a Mission 66 landscape. The degree of impact may be limited if, for example, utilities are replaced in kind (preserving historical function) or if new infrastructure is either buried or visually and functionally compatible with the cultural landscape.

Building interior repair and rehabilitation of Mission 66 housing units would not constitute a negative impact if the alterations are limited in scale and do not result in major changes to building exteriors. For example, some interior utilities upgrades require limited exterior modifications such as installation of a fuse box.

Building interior remodeling of Mission 66 housing units may cause negative impacts on the building if it alters the definition of interior spaces, function of spaces, or sequence through spaces (Carr et al. 2015).

However, these impacts would be limited to the individual housing unit and would have no impact on any historic district to which the building contributes.

Exterior repair, rehabilitation, or remodeling of Mission 66 housing units may cause negative impacts on the building if they include additions or other major exterior alterations that transform its outward appearance. Such transformative additions and alterations may include exterior fenestration or a new roof structure that is nonreversible and completely alters the exterior appearance of the building. However, these impacts would be limited to the individual housing unit and may have little or no impact on any historic district to which the building contributes.

Demolition and replacement of a Mission 66 housing unit would constitute a negative impact on the building itself and to any Mission 66 districts to which it contributes. However, if the new building is compatible in design with the Mission 66 architectural style, demolition and replacement may constitute only a limited impact on resources since Mission 66 housing properties are analyzed at the level of the historic district, as will be discussed below.

Construction of new structures or housing units in a Mission 66 district would constitute a negative impact on the cultural landscape. These impacts would be limited if the new housing units are compatible in design with the Mission 66 architecture style, including the design of the building's surrounding landscape, and if the spatial arrangement of the housing units, any new circulation patterns, and new vegetation (and other designed landscape features) are consistent with the historic district's design.

Certain project work to building interiors and exteriors will stabilize the physical integrity of existing housing units. If conducted according to the Standards for Treatment, this constitutes a beneficial impact on Mission 66 properties that otherwise would continue to deteriorate and potentially be demolished for safety reasons.

When analyzing the impacts of a housing project, the Mission 66 property being analyzed for impacts will generally be defined as a historic district rather than an individual building, sometimes limited to just the housing district which may include other components of a Mission 66-era developed area. The negative impacts on Mission 66 buildings discussed above, therefore, should be thought of as impacting a component (the building) of a larger historic property per se. When applying the Standards for Treatment to an overall project that involves multiple buildings, the assessment of impacts would consider the cumulative effect (as defined in the Standards for Treatment) of the overall project, rather than on each building or site individually. Depending on the park-specific context, even the demolition of a Mission 66 building that contributes to a historic district may constitute only a limited impact on the historic district.

Therefore, projects that repair, rehabilitate, or remodel Mission 66 building interiors or exteriors, and projects that demolish and replace a limited number of housing units, would have only a limited impact on Mission 66 properties (defined as historic districts) because there would be few or no impacts on the spatial organization, cluster arrangements, circulation patterns, vegetation patterns, or other designed landscape features of the district. This assessment assumes that the Standards for Treatment would be applied to all project designs, so that, for example, replacement housing units and associated infrastructure such as driveways would be compatibly designed and impacts on historic vegetation patterns associated with housing units (e.g. vegetation clearing for access as noted in Chapter 2.2) would be avoided or minimized (see also best practices in Chapter 2.2, regarding prioritizing protection of topsoil and cultural landscape vegetation).

For housing units constructed before 1945, the potential range of impacts under the preferred alternative would be similar to those described for individual buildings from the Mission 66 era. These pre-1945 buildings may have been constructed individually or in a small cluster that originally did not create a

historic district but, subsequently during the Mission 66 era, may have been altered and/or incorporated into a historic district. Therefore, impacts on these buildings may have to be analyzed at the level of the individual building (for its pre-1945 character) as well as at the level of the historic district if the building was later incorporated into a Mission 66 district. At a given park, the level of impacts on these housing units as individual historic structures would be limited by application of the LOAs described in Chapter 2.2, namely that project work would not result in a loss of NRHP eligibility or the NRHP-delisting of the individual building.

The severity of impacts on any cultural landscapes or historic structures under the preferred alternative would be substantially limited by application of the LOAs described in Chapter 2.2. Any future park housing project that may cause a loss of NRHP eligibility or the NRHP-delisting of a historic property—for example, a Mission 66 historic district or an individually-eligible pre-1945 housing unit—would not be subject to this environmental assessment. For housing projects that are subject to this environmental assessment, negative impacts on cultural landscapes and historic structures would be avoided or minimized through several strategies, including the best practices listed in Chapter 2.2. These strategies include consulting the M66 MPDF and the M66 Program Comment prior to each housing project to inform project design and avoid or mitigate impacts on Mission 66 properties; and incorporating the Standards for Treatment into project designs impacting historic structures and cultural landscapes from any era to ensure that project work is compatible with preservation guidelines. Each individual park undertaking a housing project would conduct the NHPA Section 106 review process during the project design phase to avoid, minimize, or mitigate adverse effects to historic districts and historic structures.

Because impacts on cultural landscapes and historic structures under the preferred alternative would not cause a loss of NRHP eligibility or the delisting of a NRHP property, impacts from a housing project at a given park would be localized, such that impacts on one site or park would not be expected to compound impacts at other sites or parks (e.g. the loss of an entire architectural style).

Socioeconomics and Economic Effects

The selected alternative will not result in any impact, adverse or beneficial, on socioeconomics and economic effects. The proposals outlined in the EA impact employee housing within park unit boundaries. Any potential impact beyond this would be speculative. As a result, this topic was dismissed from further analysis.

Degree to Which the Selected Alternative Affects Public Health and Safety

The selected alternative considers public health and safety during project implementation. Access to employee housing is restricted to employees and their immediate family members. While occurrences of members of the public have been observed trespassing in these areas, no recorded impacts on health and safety have been documented.

Effects on the Quality of Life of the American People

Implementation of the selected alternative will not meaningfully affect the public's quality of life. Access to recreation in park units will remain the same, as the repair, rehabilitation, or remodeling of existing NPS employee housing units, or the construction of new housing units, does not preclude or interfere with public access. The selected alternative will not affect emergency services, public water supply, transportation, education, or social services. The selected alternative will not affect the public's ability to passively use ecosystems on NPS lands as employee housing units are built in administrative areas outside of ecosystems. The selected alternative would not affect public education or interpretation at the parks, as construction work on employee housing units, or the building of new housing units, would not interfere with interpretive opportunities which are generally located on designated trails and at visitor centers, which are not associated with the areas where housing is established.

1.4.3 Agency Cooperation and Consultation

Agency and Tribal Consultation

Section 7 of the Endangered Species Act requires federal agencies to ensure that the actions they authorize, fund, or carry out do not jeopardize the continued existence of listed species or destroy or adversely modify critical habitat. Because this EA does not directly result in changes to the environment, and due to the fact that requirements for identifying and mitigating impacts to species will change over time, site specific review of impacts to listed species is required and will be done as part of the site specific reviews.

The proposals in the EA are conceptual and do not represent undertakings since no projects associated with this plan have been approved or funded and therefore cannot move forward. The proposals may take years to implement and are subject to change pending new information, for example, new data resulting from archeological survey. Specific details of the proposals, such as specific areas of ground disturbance, have been left to park units for future project planning and design. Park units would prepare and evaluate any proposals in accordance with Section 106 of the National Historic Preservation Act. Federally recognized Tribes will be notified by park units of project proposals as they are developed.

FINDING OF NO SIGNIFICANT IMPACT

Based on the information contained in the EA and described above, the NPS has determined that the selected alternative does not constitute a major federal action meeting the criteria that normally requires preparation of an environmental impact statement (EIS). Therefore, an EIS will not be required.

This finding is based on consideration of the Council on Environmental Quality and NPS guidance, in place at the time NPS initiated NEPA review, on the criteria for significance, regarding the potentially affected environment and degrees of effects of the impacts described in the EA (which is hereby incorporated by reference) and as summarized above.

ATTACHMENT A: RESPONSES TO SUBSTANTIVE PUBLIC COMMENTS ON ENVIRONMENTAL ASSESSMENT

No substantive public comments were received. The EA was released for public comment via the NPS's Planning Environment and Public Comment system (PEPC) from September 22 to October 24. Eight (8) comments were received. Of the 8 correspondences 6 were in favor with only 1 against. The remaining correspondence was neither for or against but was editorial in nature. None of the comments provided substantive information requiring modifications to the EA.

Even the comment opposed to the preferred alternative recognized the importance of providing housing for park staff. Most of the comments included discussion of the need to further identify and incorporate design and construction methods that would further control and reduce impacts. Because these are site specific and construction related concerns, they are more appropriately considered at the individual project level.

A few of the comments demonstrated preference for protection of one type of resource over another, or that certain resources were not of sufficient value to warrant protection. This would be contrary to the mission of the NPS and potentially unviable given current regulations.

ATTACHMENT B: ERRATA INDICATING TEXT CHANGES TO THE ENVIRONMENTAL ASSESSMENT

1.3 PURPOSE AND NEED FOR ACTION

Park housing provides economical, on-site lodging and is essential for recruiting and retaining qualified staff. Many parks are located in remote areas with little access to housing outside the park boundaries. Across the nation, available housing that is both outside park boundaries and within a reasonable driving distance has become increasingly unaffordable for staff. Park housing is becoming more essential, yet many parks lack adequate housing supply, and those that exist are aging. The majority of housing units were built between 1945 to 1972, during the Mission 66 era, and the average unit on an NPS site is 68 years old. Many of these older units do not meet modern safety standards or building codes.

The purpose of taking action is to provide adequate housing for parks staff.

The action must address the following needs:

1. Comply with the requirements of 5 USC 5911 and NPS DO 36.
2. Provide sufficient park housing to meet the needs for park staffing.
3. Address housing code and safety standard deficiencies in housing units to ensure human health and safety.

2.3 BEST PRACTICES

The following are examples of best practices ~~typically~~ followed where practicable to avoid or minimize adverse environmental impacts. The list is not exhaustive:

Appendix A:

Human Health and Safety

One of the objectives of the proposed project is to reduce the risk to human health and safety by addressing health and safety code issues at park housing which will result in beneficial impacts to human health and safety. Therefore, the topic of human health and safety was dismissed as a resource topic from further analysis.

ATTACHMENT C: DETERMINATION OF NO IMPAIRMENT

Compliance with NPS Management Policies Unacceptable Impact and Non-Impairment Standard

The National Park Service (NPS) Organic Act of 1916 directs the NPS to "conserve the scenery, natural, and historic objects, and wildlife in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wildlife in such manner and by such means as will leave them unimpaired for the enjoyment of future generations" (54 USC 100101). Guidance for Non-Impairment Determinations and the NPS NEPA Process (April 2025) provides guidance for completing non-impairment determinations for NPS actions requiring preparation of an environmental assessment (EA) or environmental impact statement (EIS) pursuant to the National Environmental Policy Act (NEPA). The NPS has completed a determination of no impairment analysis for the National Park Service Employee Housing Projects Environmental Assessment and determined that it will not result in impairment of park resources, or in unacceptable impacts as described in § 1.4.7.1 of the 2006 NPS Management Policies.

NPS Management Policies 2006, Section 1.4.4, explains the prohibition on impairment of park resources and values:

"While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them."

An action constitutes impairment when its impacts "harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values" (NPS 2006, Section 1.4.5). To determine impairment, the NPS must evaluate the resources and values that will be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts. An impact on any park resource or value may constitute impairment, but an impact would be more likely to constitute an 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 to opportunities for enjoyment of the park; or
- identified in the park's general management plan or other relevant NPS planning documents as being of significance (NPS 2006, Section 1.4.5).

NPS non-impairment analysis normally does not include discussion of impacts to visitor experience, socioeconomics, public health and safety, park operations, wilderness, etc., as these do not constitute impacts to park resources and values subject to the non-impairment standard under the Organic Act. See Management Policies § 1.4.6.

Determination of No Impairment for the National Park Service Employee Housing Projects Environmental Assessment

As a basis for evaluating the potential for impairment on park unit resources, the NPS relied on the EA. The EA includes analysis of impacts to vegetation, wildlife, archeological resources, cultural landscapes and historic structures. Some resource impacts, such as visitor use and experience, were dismissed from detailed analysis in the EA. Please refer to Appendix A of the EA for a discussion of impact topics considered but dismissed from detailed analysis. Those resources are not evaluated in this document because impacts to those resources are so small that they cannot result in impairment and do not warrant additional discussion here.

The EA evaluated one action alternative for repairing, rehabilitating, or remodeling existing National Park Service employee housing units or constructing new housing units. That alternative is the selected alternative. The selected alternative, Alternative 2, is described in detail in the FONSI.

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