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PACIFIC WEST REGIONAL OFFICE Memorandum

L7617 (PWRO-PP)

19 JAN 2011

Memorandum

To: Superintendent, Olympic National Park

From: Regional Director, Pacific West Region

Subject: Environmental Compliance for Port Angeles Stormwater Separation Project

The *Finding of No Significant Impact* for this City of Port Angeles collaborative element of the Elwha River Ecosystem Restoration initiative is approved.

To complete this particular compliance effort, at the time when the park announces the decision, copies of the FONSI should be made available to all individuals and organizations that received the supporting environmental assessment.


for Christine S. Lehnertz

Attachment

cc watch:
PWR-LIC\ARRA
DSC-PM

**NATIONAL PARK SERVICE
OLYMPIC NATIONAL PARK
PORT ANGELES STORMWATER SEPARATION PROJECT**

**FINDING OF NO SIGNIFICANT IMPACT
DECEMBER 2010**

This Finding of No Significant Impact (FONSI) has been prepared in accordance with the National Environmental Policy Act (NEPA) for the Port Angeles Stormwater Separation Project. This FONSI together with the *Port Angeles Stormwater Separation Project Environmental Assessment* (EA) (October 2010), constitutes the complete record of the environmental impact analysis and decision-making process for the Port Angeles Stormwater Separation Project.

In collaboration with the City of Port Angeles, the National Park Service (NPS) will implement the management preferred alternative as described in the EA, which includes collecting stormwater from impervious surfaces in a four-block area of downtown Port Angeles and separating it from household wastewater and sewage. Currently, stormwater from this area is added to the City of Port Angeles' combined sewers and is treated by the wastewater treatment plant, or discharged during high flow events as combined sewer overflows (CSOs). The project area is located in downtown Port Angeles outside the boundary of Olympic National Park (ONP).

The selected action is a component project of the larger Elwha River Ecosystem Restoration Project, as mandated by the Elwha River Ecosystem and Fisheries Restoration Act (Public Law 102-495). To accomplish the purposes of the Elwha Act, three documents were completed to analyze alternatives: The *Elwha River Ecosystem Restoration Project: Final Environmental Impact Statement* (June 1995); the *Elwha River Ecosystem Restoration Project Implementation: Final Environmental Impact Statement* (November 1996); and the *Elwha River Ecosystem Restoration Project Implementation: Final Supplement to the Final Environmental Impact Statement* (July 2005). The Elwha River Ecosystem Restoration EISs addressed the overall large-scale plan for removal of the dams and river restoration. The Port Angeles Stormwater Separation Project EA is tiered to the previous EISs, and was prepared to address the site-specific measures needed to protect the City's wastewater system from impacts related to the Elwha dam removal.

PURPOSE AND NEED FOR FEDERAL ACTION

The selected action includes constructing a new storm drain to separate stormwater from a portion of downtown Port Angeles, and discharging it to an existing storm drain at Valley Street. The purpose of the action is to protect the City of Port Angeles' wastewater system from impacts associated with increased wastewater flows. The need for the action stems from the effects of the Elwha dam removal under the Elwha River Ecosystem Restoration Project on Lower Elwha Klallam tribal community septic systems, and a related agreement between the Lower Elwha Klallam Tribe (LEKT) and the City regarding the treatment of wastewater flows.

With the Elwha dams removed, there will be higher surface water elevations and higher groundwater in the river's flood plains, which include areas within the LEKT reservation. In turn, higher groundwater will increase the risk of septic system failures on the reservation. To protect the tribal community from this increased risk and provide for continued collection and treatment of the community's wastewater, the NPS is constructing a wastewater collection system to transport untreated wastewater from the reservation to the City of Port Angeles' existing wastewater treatment plant. In collaboration with the City of Port Angeles, the collected wastewater will be treated and discharged at the City's wastewater treatment plant.

Adding the collected wastewater to the City's sewer system would put additional pressure on the City's combined sewer system, and would contribute to increased combined sewer overflow (CSO) discharges. Existing CSO discharges are regulated under a National Pollution Discharge Elimination Permit (NPDES) issued by the Washington Department of Ecology (NPDES Phase II, January 17, 2007). Under an Agreed Order with the Washington Department of Ecology, the City is not permitted to take any actions that increase the number or quantity of untreated discharges. The agreement between LEKT and the City addressing wastewater conveyance, treatment, and disposal services, is conditional on the LEKT providing facilities that are designed to limit flows into the City's collection system, thereby avoiding any increase in the rate or volume of CSO discharges.

RANGE OF ALTERNATIVES CONSIDERED

The EA analyzed two alternatives in detail: 1) the no action alternative, which does not include any new measures to collect or dispose of stormwater flows in downtown Port Angeles; and 2) the management preferred alternative, which proposes to collect stormwater from impervious surfaces in a four-block area of downtown Port Angeles and keep it separate from household wastewater and sewage. The selected and no action alternatives are described below. Additional alternatives that were also considered, but eliminated from further evaluation in the EA, are discussed later in this document.

Selected Action

The selected action includes collecting stormwater from impervious surfaces in a four-block area of downtown Port Angeles (a 3.9-acre area) and diverting the stormwater to an existing storm drain at Valley Street. Currently, stormwater from this area is added to the City's combined sewers and is treated by the wastewater treatment plant, or is discharged directly to Port Angeles Harbor during CSO events.

The selected action includes construction of approximately 1,750 lineal feet of buried 18-inch diameter storm pipe on First Street from Laurel to Valley Street. Shallow lateral pipes will be constructed within the street to connect the existing collection basins along First Street to the new storm drain pipe, which will discharge to the existing Valley Street storm drain. The Valley Street drain discharges to Valley Creek, which is currently piped through downtown Port Angeles. Valley Creek discharges into Port Angeles Harbor at Valley Creek Estuary Park. All

construction will occur within existing City streets and there will be no in-water work associated with the action.

The selected action will remove approximately 300 gallons per minute (gpm), or greater, during CSO-causing rain events from the City's combined sewers. This additional stormwater flow to the Valley Street storm drain will result in an increase in Valley Creek flows of approximately 0.3 cubic feet per second (cfs) (1 to 3 percent of total creek flow) during 1-year storm events and approximately 1.9 cfs (less than 1 percent of total creek flow) during 25-year storm events. Outside of storm events, there will be negligible, or no change in flow within Valley Creek. A water quality treatment unit 'Ecostorm Plus' will be installed that will provide levels of treatment meeting or exceeding state stormwater requirements. The selected treatment unit will be able to treat up to 360-gpm and has a 5-year media replacement interval (concrete filter disk), oil storage (for gross spills), trash/floatables removal, and treatment for removal of total suspended solids (TSS), metals, nutrients, and hydrocarbons, consistent with Ecology requirements.

The new storm drain pipe will be aligned within one traffic lane on First Street to minimize construction impacts. It will require a moving, one-lane bypass with traffic control as the work moves up the street.

Slight modifications in pipe design and installation procedures could occur during final design.

GENERAL CONSTRUCTION SCHEDULE

Construction activities are currently planned for early 2011 and are expected to last for two to three months.

OTHER ALTERNATIVES CONSIDERED AND ANALYZED

In addition to the selected action, the EA considered a no action alternative.

No Action Alternative

Under the no action alternative, there would be no project to collect and divert stormwater in a portion of downtown Port Angeles from the City's combined sewer system to the Valley Creek drain. Stormwater from this area would continue to be treated by the City's wastewater treatment plant, or discharged during high flow events as combined sewer overflows (CSOs).

Additional flows to the City's collection system from the Lower Elwha Klallam tribal community would result in increased frequency and volume of CSO events. This would be in conflict with stipulations of the City's agreement with the LEKT that the additional flows not cause or increase the frequency of CSOs. This would also result in violation of the Agreed Order from the Washington State Department of Ecology (Ecology) that does not allow the City to take any actions that increase the number or volume of untreated discharges.

The no action alternative does not include any new measures to collect or dispose of stormwater flows in downtown Port Angeles. Because the decision to remove the dams has already been made and the Lower Elwha Klallam Tribe has already received permission from the City of Port Angeles to connect to the City wastewater system, the no action alternative was included in the EA for comparison purposes only, and was not considered a viable option.

ALTERNATIVES CONSIDERED AND REJECTED

In addition to the no action and preferred alternatives, two other options were evaluated as potential alternatives.

Oak Street Alternative

The Oak Street alternative was developed to avoid discharge to city creeks and instead to discharge directly to Port Angeles Harbor. This alternative would establish a discharge point to the north using Oak Street. A storm drain pipe would be constructed along Valley Street from the intersection of Valley Street and First Street to Oak Street, two blocks north.

The evaluation of this alternative concluded that there would likely be dewatering issues associated with tidally-influenced groundwater at this location. The Oak Street alternative would also require a new outfall be constructed through the seawall, which would present permissibility issues and likely impacts to aesthetic and recreational values of the beach. Results of the evaluation determined that the Oak Street alternative was not feasible based on consideration of environmental impacts, constructability, and costs.

Storage Alternative

The agreement between LEKT and the City addressing wastewater conveyance, treatment, and disposal services, is conditional on the LEKT providing facilities that are designed to limit flows into the City's collection system. The agreement originally included a provision for the LEKT to install a storage tank sized to contain all flow during a CSO event. The storage alternative would include constructing a storage facility. The storage facility would contain all wastewater flow during a CSO event. Based on the results of modeling to predict flows, which included adjustments to include new City conveyance and storage facilities planned for compliance with state requirements, it was determined that the storage facility would need to provide a volume of 430,000 gallons to avoid impacting City CSO compliance.

The storage alternative would have required long-term maintenance requirements, right-of-way issues (for siting of the storage tank), and potential odor issues from the storage of untreated wastewater. The evaluation of this alternative concluded that there would likely be substantial construction and long term operating costs. It reduces City wastewater flows only under certain storm events, and does not provide opportunities for future flow reductions.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The “environmentally preferred” alternative is determined by applying the criteria cited in the National Environmental Policy Act of 1969 (NEPA), and in accordance with the Council on Environmental Quality (CEQ) regulations. The CEQ provides direction that “[t]he environmentally preferred alternative is the alternative that would promote the national environmental policy as expressed in section 101 of NEPA, which considers:

- (1) Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
- (2) Assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings;
- (3) Attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences;
- (4) Preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment, which supports diversity and variety of individual choice;
- (5) Achieve a balance between population and resource use, which will permit high standards of living and a wide sharing of life’s amenities; and
- (6) Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.”

The NPS is required to identify the environmentally preferred alternative(s) for any of its proposed projects. In essence, the environmentally preferred alternative would be the one(s) that “causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources.”

The NPS determined that the environmentally preferred alternative is to implement the stormwater separation project described for the management preferred alternative because it surpasses the no action alternative in realizing the full range of goals as stated in Section 101 of NEPA. The stormwater separation project mitigates the effect of LEKT flows on the City’s combined sewer system, and has the added benefit of contributing to reduction in CSO events, thereby producing water quality benefits to Port Angeles Harbor (goals 2, 3, and 4).

The no action alternative would preserve existing conditions, but it does not address the effect the wastewater flows from the reservation would have on the City’s sewer system. These increased flows would result in increased CSO events from the City’s combined sewers, at the same time the City is undertaking projects to reduce CSO events. The no action alternative is not the environmentally preferred alternative for the following reasons: (1) it would not satisfy the requirements of the Elwha Act, which requires protection of existing water quality for the City of Port Angeles against adverse impacts of dam removal, and (2) it would increase the frequency and volume of CSO events, which would not be in conformance with the City’s Agreed Order with the Washington Department of Ecology. The no action alternative does not fully meet NEPA Section 101 goals.

MITIGATION

Mitigation measures have been incorporated into the selected action to avoid or reduce impacts. Table 1 summarizes mitigation measures.

Table 1. Mitigation Measures

Resource Area	Mitigation	Responsible Party
General Considerations	<p>The construction zone will be identified and fenced with construction tape, fencing, or some similar material prior to any construction activity. The fencing will define the construction zone and confine activity to the minimum area required for construction. All protection measures will be clearly stated in the construction specifications, and workers will be instructed to avoid conducting activities beyond the construction zone. Disturbances will be limited to areas inside the designated construction limits. No machinery or equipment will access areas outside the construction limits. Construction equipment staging will occur on First Street, proceeding up the street as construction proceeds.</p> <p>Construction vehicle engines will not be allowed to idle for extended periods of time when not in use.</p> <p>All tools, equipment, barricades, signs, surplus materials, and rubbish will be removed from the project work limits upon project completion. The street will be restored to its previous condition following construction.</p>	Contractor
Soils	<p>Best management erosion-control practices for excavation and trenching to install the pipeline will be implemented to minimize erosion on-site and soil tracking off-site.</p>	Contractor

Resource Area	Mitigation	Responsible Party
Water Quality	<p>Best management erosion-control practices for excavation and trenching to install the pipeline will be implemented to minimize turbidity.</p> <p>Prior to starting work each day, all machinery will be inspected for leaks (e.g., fuel, oil, and hydraulic fluid), and all necessary repairs will be made before commencing work. Hydraulic fluid utilized in machinery shall be bio-degradable. This measure is designed to avoid/minimize the introduction of chemical contaminants associated with machinery used in project implementation.</p> <p>Hazardous spill clean-up materials will be on-site at all times. This measure is designed to avoid/minimize the introduction of chemical contaminants associated with machinery (e.g., fuel, oil, and hydraulic fluid) used in project implementation because chemicals may have a toxic effect on aquatic organisms.</p>	Contractor
Special Status Species	<p>Best management erosion-control practices for excavation and trenching to install the pipeline will be implemented to minimize turbidity that could have adverse impacts on local ecology and special status species.</p>	Contractor

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

As defined by 40 CFR 1508.27, significance is determined by examining the following criteria: impacts that may be both beneficial and adverse and which on balance may be beneficial, but that may still have significant adverse impacts that require analysis in an environmental impact statement. No potentially significant adverse or beneficial impacts were identified that will require analysis in an environmental impact statement.

The impact topics identified and documented in the EA include the following: soils, water quality, and special status species. Impacts to these resources, as described below, will not exceed an intensity level of minor.

The following summarizes the resource impact considerations from implementing the selected action. Mitigation measures will be employed to minimize these impacts during and after completion of the project. The EA provides detailed consideration of the factors supporting the determination of non-significance.

Degree of effect on public health and safety: The project site is located outside of ONP in downtown Port Angeles with no active recreation in the construction area.

Nearby recreation resources include Valley Creek Estuary Park. Recreational amenities at the park include a pavilion, viewing tower, bridge, benches, beach access, and access to the Waterfront Trail. The Waterfront Trail follows the waterfront of the Port Angeles Harbor and is part of a larger trail system, the Olympic Discovery Trail, planned to eventually run from Port Townsend to Forks, a distance of approximately 150 miles. Future recreational resources near the project area include the Valley Creek Loop Trail, planned along the Valley Creek corridor.

The selected action will have no direct impacts on existing or planned recreation facilities or use of nearby recreation sites. Public access to the construction area will be restricted through the use of fencing and signage. Construction will result in a temporary increase in noise from equipment operation. As a result, adverse impacts on visitor use would be localized, short-term, and negligible, and there would be no impacts on public safety.

Unique characteristics of the geographic areas such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas: There are no known cultural resources (archaeological resources, historic structures, cultural landscapes, ethnographic resources, museum collections) in the area of potential effect, which is the existing city street prism on First Street from Laurel Street to Valley Street.

There are no prime or unique farmlands or wetlands associated with the project area. The project area does not contain any ecologically critical areas. Utilizing the existing Valley Street drain will result in increased discharge to Valley Creek, which provides habitat for fish and wildlife, but the adverse effects to fish and wildlife would be localized, short-term, and negligible.

Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in the National Register of Historic Places (NRHP), or may cause loss or destruction of significant scientific, cultural, or historic resources: There are no known cultural resources (archaeological resources, historic structures, cultural landscapes, ethnographic resources, museum collections) in the area of potential effect, which is the existing city street prism on First Street from Laurel Street to Valley Street.

Because all construction will occur within the fill material of the existing road prism, it is highly unlikely that ground disturbances will reach buried, historical ground surfaces where archeological sites could be present. However, due to the August 14, 2006 Settlement Agreement Among the State of Washington, Lower Elwha Klallam Tribe, City of Port Angeles, and Port of Port Angeles, the City Archeologist will be available to monitor construction activities as necessary. In the unlikely event that archeological resources are discovered during construction, all work in the immediate vicinity of the discovery will be halted until the resources could be identified and documented and, if the resources cannot be preserved in situ, an appropriate mitigation strategy will be developed in consultation with the state historic preservation officer and, if necessary, the LEKT.

To meet the requirements of Section 106 of the National Historic Preservation Act (NHPA), the Washington State Historic Preservation Office and the LEKT were consulted and they concurred with a finding of no effect to historic properties.

Degree to which the effects on the quality of the human environment are highly controversial: There were no highly controversial effects identified during either the preparation of the EA or the public review period.

Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks: There were no highly uncertain, unique, or unknown risks identified during either preparation of the EA or the public review period.

Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration: The selected action neither establishes a NPS precedent for future actions with significant effects nor represents a decision in principle about a future consideration.

Whether the action is related to other actions with individually significant, but cumulatively significant impacts: The EA analyzed impacts to soils, water quality, and special status species. As described in the EA, the cumulative effects of past, present, and future actions on these resources, combined with the impacts of the selected action, are not anticipated to produce any significant adverse cumulative effects.

The action is part of mitigation to protect the LEKT from impacts of removing two dams on the Elwha River as part of the Elwha River Ecosystem Restoration Project. The associated impacts of the dam removal were addressed in the EIS documents described above for the Elwha River Ecosystem Restoration Project.

Degree of effect on soils; water quality, threatened, endangered, and species of special concern: As described in the EA, construction of the selected action will require trenching within the road right-of-way along 1,750 feet of First Street. Trenching will take place adjacent to the existing sanitary sewer line in previously disturbed and imported fill soils. As with all projects, erosion could occur as a result of construction activities, such as trenching. Soils temporarily exposed during construction could be eroded by stormwater runoff. Erosion control measures will be implemented to minimize these potential short-term impacts. The disturbance and loss of material from excavation of the storm drain pipe trench would be localized, short-term, negligible and adverse.

Because of the short-term nature of the construction disturbance, and the implementation of appropriate Best Management Practices (BMPs), no adverse impacts on water quality are expected to occur during construction. With the treatment facility, the stormwater discharge is expected to be of the same or better quality than the current water quality of the creek. The potential impacts relate primarily to increased flow and potential for temperature changes in the stream. The additional stormwater flows discharged to Valley Creek under the selected action are

not expected to be of sufficient size or duration to create scour or contribute to erosion of streambanks; therefore, any increase in sedimentation/turbidity will be negligible. Given the stormwater discharge will only increase overall stream flows by 1 to 3 percent during storm events, and the fact that stormwater discharges will primarily occur during the late fall and winter when temperatures are much cooler than during the summer, no appreciable difference between discharge and creek temperatures at the discharge site is anticipated. As a result, the selected action would have a long-term, negligible, and adverse effect on water quality in a localized area of Valley Creek. Implementation of the selected action would result in a long-term and beneficial effect on water quality in Port Angeles Harbor by reducing the volume and frequency of CSO discharges in the Harbor.

The potential for impacts on special-status species primarily relates to the potential short and long-term water quality effects as described above. With the treatment facility and the low relative volume of stormwater that will be discharged, it is expected that the additional stormwater will maintain habitat conditions in the localized area of discharge. The potential for short-term impacts on special status species from soil disturbing activities, and accidental spills from heavy equipment will be minimized with the implementation of BMPs.

The action is expected to have no effect on federally listed freshwater and marine species, including Puget Sound Chinook salmon, Puget Sound steelhead, coho salmon, and bull trout. There are no anticipated effects to fish species that have Essential Fish Habitat (EFH) within Port Angeles Harbor. Over the long-term, the selected action will also contribute to reductions in CSO frequency and volumes within the City of Port Angeles thereby continuing efforts by the City to address degraded water quality conditions within Port Angeles Harbor, which would a long-term benefit to marine special status species. There are no anticipated effects to marbled murrelet, Pacific herring, Pacific eulachon, Steller sea lion, or killer whale because of the lack of suitable habitat or infrequent activity by these species in the project area. There would be no impact on federally listed plants in the project area because none are present.

Whether the action threatens a violation of federal, state, or local environmental protection laws: The selected action violates no federal, state, or local environmental protection laws.

PUBLIC INVOLVMENT AND AGENCY CONSULTATION

Public Scoping

Internal scoping was conducted between August 2009 and March 2010, and involved an interdisciplinary team of NPS and City staff who assessed site conditions and determined potential issues.

ONP conducted public scoping from March 30 to May 3, 2010. Information about the project was posted on the park website and on the NPS Planning, Environment, and Public Comment (PEPC) website. A news release was faxed and e-mailed to a standard mailing list of approximately 100 individuals and interested groups, as well as approximately 75 media outlets along the Washington I-5 corridor and the Olympic Peninsula. In addition, the park notified 40

elected officials, organizations, area tribes, and agencies on the park's mailing list via a mailed letter. The purpose of public scoping was to gain input on the issues of concern related to the proposed project and identify potential projects in the area that could lead to cumulative impacts. One comment letter was received and was generally in support of the proposed action.

The NPS completed informal consultation with U.S. Fish and Wildlife Service (FWS) and National Marine Fisheries Service (NMFS) and there were no concerns or requests for additional consultation by either agency. The project is expected to have no effect on federally listed threatened and endangered species.

Public Review of the EA

The EA was released for a 30-day public review on October 5, 2010. Over 45 printed copies of the document were distributed to federal and state agencies, local organizations, and interested parties. A press release was circulated to approximately 100 individuals and interested groups, as well as approximately 75 media outlets along the Washington I-5 corridor and the Olympic Peninsula. An electronic version of the EA was broadly available through a posting on the NPS Planning, Environment and Public Comment (PEPC) website and linked to the park's public website. Printed copies of the EA were also available at several area libraries, including the North Olympic Library System libraries in Port Angeles, Sequim, Forks, and Clallam Bay.

The public review and comment period for the EA was open until November 10, 2010. The park received no comments during the public review period of the EA. As a result, no additional, new, or substantive information was received that would require revising the EA for additional public review or that would change the determination of effects.

Consultation and Coordination

No resources eligible for listing in the National Register of Historical Places were found during surveys of the area of potential effect. To meet the requirements of Section 106 of the NHPA, the Washington State Historic Preservation Office and Lower Elwha Klallam Tribe were consulted and they concurred with the finding of no effect to historic properties.

The project is expected to have no effect on federally listed threatened and endangered species. The NPS completed informal consultation with FWS and NMFS and there were no concerns or requests for additional consultation by either agency.

IMPAIRMENT OF PARK RESOURCES OR VALUES

The NPS typically conducts an analysis of potential effects to determine if actions would impair park resources or cause unacceptable impacts. Neither NPS policies nor managerial determinations regarding impairment or unacceptable impacts apply to non-NPS lands or resources. Because the selected action is located outside of Olympic National Park, no determination is made regarding impairment or unacceptable impacts to park resources.

CONCLUSION

Based on the conservation planning and environmental impact analysis documented in the EA, with due consideration of the nature of the public comments and consultation with other agencies, and given the capability of the mitigation measures to avoid, reduce, or eliminate impacts, the NPS has determined that the selected action does not constitute a federal action that normally requires a preparation of an EIS. The selected action will not have a significant effect on the quality of the human environment or the park's cultural resources or natural resources, and will not jeopardize the continued existence of threatened or endangered species.

There are no unmitigated adverse impacts on public safety; sites or districts listed in, or eligible for listing in NRHP, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, cumulative effects or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection law. Based on the foregoing, it has been determined that the selected action may be implemented as soon as practicable.

Recommended:

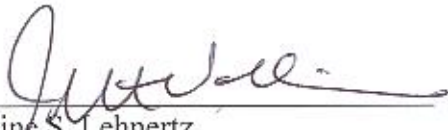


Karen Gustin
Superintendent, Olympic National Park

1/3/11

Date

Approved:



Christine S. Lehnertz
Regional Director, Pacific West Region

1/4/11

Date