Attachment 10I(1)

Explanatory Note for the National Park Service
November 5, 2010

Attached is the National Park Service (NPS) National Environmental Policy Act (NEPA) Report as required under the American Recovery and Reinvestment Act (ARRA) of 2009, Section 1609(c), for the period ending September 30, 2010. The NPS was approved for $750 million of ARRA funding under three Treasury Appropriations Funds, including Operations of the National Park System, Construction and Major Maintenance, and Historic Preservation.

There are a total of 831 ARRA projects and activities reported as of September 30, 2010. Thirteen projects were cancelled during this reporting period and one project was added, resulting in a net loss of twelve projects compared to the number reported previously.

New Entries on the NPS report – One project was added during the reporting period. For ease of tracking, this entry was entered at the bottom of page 2 of the report, on row 977 to ensure that the rows of the spreadsheet were retained as previously reported.

NEPA not applicable- One project entitled "Construction- 151254: APPA Mitigate Rockfall Hazard at Lehigh Gap Palmerton Superfund Site" is located within a designated National Priorities List Superfund Site and will be addressed under CERLCA, which is considered the functional equivalent of NEPA. Therefore, it was not entered on page 2 of the spreadsheet.

Projects with Multiple NEPA actions- There are some instances where more than one NEPA action has been applied to the same ARRA project. Some NEPA documents are being tiered, with various levels of NEPA compliance being completed. There are other instances where multiple actions have been grouped together as one project in order to manage the ARRA program more effectively (this is especially the case for smaller, lower-dollar projects being combined for ease of financial tracking and organization). When there is more than one NEPA action being applied to the same ARRA project, each NEPA action is listed as a separate entry on page 2 of the report. This results in more NEPA actions than ARRA projects.

- An example of smaller, lower dollar projects being combined is the Intermountain Region's project titled "Green Renewable Energy Efficiency Network." This project encompasses 13 similar types of actions at different parks in the region. The entry on row 501 captures the 10 parks that have completed their NEPA compliance, while row 877 captures those parks that are still working on completing their NEPA analysis.

Compliance Documents Completed Prior to ARRA- For some projects, compliance documents were completed several years ago. In addition to reporting the original NEPA action, a memo to file, or "look back" has been completed, verifying that the proposed action has already been analyzed in site-specific detail in a previous NEPA document, that no different impacts or changes to the project are expected, and that environmental conditions have not changed.

Withdrawn projects- An additional 13 projects were withdrawn during the reporting period. There have been a total of 79 withdrawn. NPS projects have been withdrawn from ARRA for the following reasons:

- Regional ARRA funds were exhausted prior to contract solicitation (rows 3, 7, 37, 236, 258, 280, 415, 417, 418, 419, 421, 422, 424, 428, 460, 476/477, 950)
- other sources of funding were used in lieu of ARRA funding (rows 24, 28, 66, 112, 156, 197, 364, 549, 598, 601, 656, 672, 681, 762),
- there was no longer a need for the project (rows 41, 59, 85, 108, 157),
- the project needed additional planning, coordination and/or compliance which would not be complete in time to meet ARRA time requirements (rows 47, 57, 111, 227, 268, 318, 374, 460, 498, 558, 567, 649, 671, 716, 804, 878, 945, 970),
- bids came in high; project must be reevaluated before it can be rebid and will be pursued via alternate funding sources in the future (rows 84, 113, 151)
- project scope was larger than expected; will be re-scoped and funded in the future (rows 97, 349, 438, 442, 525)
- contracting could not be completed prior to May 15th deadline (rows 136, 416, 248, 283, 580, 633, 847),
- project was solicited twice and no bids were received, will pursue project with other funds in the future (row 195)
- project cannot start by required date (row 478)
- the project was included on the initial ARRA list in error (row 500), and
- the park was not ready to implement the project (rows 599, 684).

The following projects were moved from the in-target list to the contingency (over-target) project list and then cancelled during a previous reporting period. Their status is noted as "withdrawn" on page 2 of the spreadsheet:

- Deferred Maintenance- 59515: GOGA Rehabilitation of the exterior envelope and the Heating & Ventilation system of Building E (row 46)
- Deferred Maintenance- 83462 & 105490: GOGA Install New Boiler and Rehabilitate Existing Heating System in Park Headquarters (row 87) – *two projects*
- Deferred Maintenance- 148295: MUIR Rehabilitate Facilities to Meet ADA Requirements (row 388)
- Deferred Maintenance- 152057: FOPO Remove Accessibility Barriers to Meet ADA Requirements (row 456)
- Deferred Maintenance- 154653: MIIN Repair Boundary Fence Along Canal (row 513)
- Trails- 145440: MIIN Maintain Trails (row 653)

Difference between reported obligation amounts and Recovery.gov- The figures provided on page 1 of the spreadsheet for total obligations do not take into account interagency agreements. Therefore, the numbers will not correspond to those being reported on Recovery.gov.

Changes in NEPA type

- Deferred Maintenance- 150705: HAMP Construct a Collections Storage Building to Replace Two Functionally Obsolete Facilities- (row 438) was previously reported as a

pending environmental assessment (EA). After completion of the scoping process, it was determined that a categorical exclusion (CE) was appropriate for this project and was completed on February 9, 2010.

- Construction- 150682: GOGA Energy Infrastructure Improvements on Alcatraz Island NHL (row 909) was previously reported as a pending environmental assessment (EA). After completion of the scoping process, it was determined that a categorical exclusion (CE) was appropriate for this project and was completed on January 22, 2010.

Pending NEPA Actions- NPS continues to make progress with regard to the completion of NEPA actions for ARRA projects. The percentage of pending NEPA actions has been reduced to less than one half of 1% during this reporting period. There are only 4 out of 996 NEPA actions whose status is currently pending (3 CEs and 1 EA).

Reasons that projects remain in a pending status include:

- Parks are awaiting the completion of the Section 106 process and/or other environmental reviews and permits before completing their NEPA compliance.
- In some cases, project designs have needed refinement and additional detail before the NEPA action can be completed.

Of the 4 pending projects, all 4 of them have been pending for more than one reporting period. Please refer to Attachment A of this memorandum for a detailed explanation as to why each NEPA action remains pending and the projected compliance completion dates.

Federal Environmental Reviews Not Yet Completed- There are some instances where NEPA compliance has been completed but some additional federal environmental reviews are ongoing; for example, consultation with State Historic Preservation Officers during project design and/or implementation.

Examples of NEPA Benefits

The NPS has provided the following examples of how NEPA has been beneficial:

Example 1
Rehabilitation of Shirley House at Vicksburg National Military Park (NPS Spreadsheet page 2, row 701)

The current proposed action is to rehabilitate the exterior of the house and replace damaged or missing historic fabric to match its 1860's appearance. The main level of the house will also be restored to its 1860's appearance to the greatest extent practical, and opened to the public. The rooms of the first floor will be used to house exhibits on themes approved in the park's Long Range Interpretive Plan. The attic and basement of the house will be preserved as-is and used for mechanical equipment, but would not be open to the public. No heating or cooling system will be installed in the structure. Only ventilation via ducts (no cooling) will be available in summer. Additional modifications will include installation of mechanical, security, fire detection, and fire suppression systems. These modifications also would provide for a safe means of visitor egress, and would help ensure the health, comfort, safety, and security of visitors and park staff, as well as complying with applicable building and safety codes.

The historic Shirley House is currently inaccessible to visitors and access is limited to only those park employees performing necessary repairs and inspections. Given its present condition, visitors cannot not enter the building or fully appreciate its historic significance. The park originally proposed to adaptively re-use the structure for offices or for a visitor contact station. However, as a result of the NEPA process and comments received during public scoping, the original scope of the project was modified to focus more on preserving, rehabilitating, and restoring the historic fabric of the structure and providing a more historically accurate setting for visitors. The preferred alternative will allow the Shirley House to be opened to the public while at the same time protecting the integrity of the historic structure and the surrounding cultural landscape.

Example 2
Timpanogos Cave Exit Shelter and Stairs, Timpanogos Cave National Monument (NPS Spreadsheet page 2, row 328) – Environmental Assessment

The Timpanogos Cave tours exit the cave along a steep south wall of American Fork Canyon. The area has experienced numerous "close calls" from rock fall hazards in the monument's 88 year history and a shelter was constructed in 1972 to protect visitors. While this structure has provided a measure of protection to both visitors and staff, "close calls" have continued on the trail just beyond the roof structure since that time. To provide additional hazard abatement, an extension to the roof was planned in 2009. During the planning and design process, a USGS Geologist was brought in to study the area and provide recommendations. During this visit, much larger pending rock fall hazards were identified. This led the monument to identify and consider alternatives that would direct visitors and staff away from the identified hazard area, including relocating the shelter to a safer location nearby. The detailed analysis of the area and the evaluation of potential environmental impacts in the NEPA process led the park to discover that potential hazards from rock fall were much greater than originally anticipated. This analysis led to the development of alternatives that will improve visitor and staff safety.

Example 3
Replace Waterlines at Fort Barry from Balloon Hanger to Field Road, Marin Headlands, Golden Gate National Recreation Area (NPS Spreadsheet page 2, row 180) –Categorical Exclusion

The project will replace and relocate waterlines in various locations in the Marin Headlands at Fort Barry. The waterline serves the Fort Barry area, providing critical fire suppression and potable water to the residents and public that lives in and visits the area. As part of the NEPA process, staff from all resource disciplines at the park reviewed proposed projects to assess potential impacts and identify ways to avoid, minimize or mitigate potential impacts to park resources. The review of this project resulted in the identification of a number of mitigation measures that were incorporated into the project to protect nesting birds, habitat for the endangered Mission Blue Butterfly, wetlands, and archeological resources. The review also identified ways to provide notification to the public and minimize traffic impacts during construction.

Example 4

Diamond X Ranch Student Intern Center and Keller House Stabilization, Santa Monica Mountains National Recreation Area (NPS Spreadsheet page 2, row 736) – Environmental Assessment

The project will replace a learning center, intern housing and employee housing that were destroyed by a wildfire. The project will also remove hazards that resulted from the wildfire and make the area safe for visitors The NEPA process allowed for public and regulatory agency input on the project, as well as input from regional and park experts. As a result of the review, the project will be more protective of park resources. Because of the NEPA review, the final project included 30 mitigation measures designed to protect the dark night sky, viewsheds, vegetation, water quality, archeology, and natural resources.

Example 5
Repair Damaged Culverts and Associated Headwalls (NPS Spreadsheet page 2, row 459) – Categorical Exclusion

The project entails repairing damaged culverts and headwalls along the Park Loop Road. One of the culverts to be repaired under this project spans Hunters Brook, a high-quality trout fishery and sensitive resource of concern. In this location, paving stones were used to armor the stream bank in the past. Due to stream movement and erosion over the years, the paving stones have fallen into the stream channel, causing additional stream bank erosion and sedimentation into the trout stream. The NEPA scoping process for this project resulted in the development of an alternative that will restore the health of Hunters Brook while preserving the historic character of the road that passes over the brook. The road and associated culvert and headwalls are part of the Park Loop Road system, which is listed on the National Register of Historic Places. This solution was developed through consultation with a number of agencies, including the Army Corps of Engineers, the Maine Department of Environmental Protection, the Maine Department of Inland Fisheries and Wildlife, and the Maine Historic Preservation Officer. If not for the NEPA and permitting processes, it would likely have been a "band-aid" repair and not the long-term solution that was needed to restore the health of the stream.

Example 6
Mori Point Restoration and Trail Plan (NPS Spreadsheet page 2, row 673) – Environmental Assessment

The project will protect and enhance habitat for the federally endangered San Francisco garter snake and the federally threatened California red-legged frog; preserve and restore the ecological integrity of Mori Point habitats by reducing threats to native plant communities and natural processes; and develop a safe and sustainable trail system, incorporating the California Coastal Trail, that improves recreational experiences and reduces impacts to park resources.

As part of the NEPA compliance, the park completed a thorough analysis of impacts to all park resources. As a result, the final project had over 35 mitigations to protect resources, including the federally endangered San Francisco garter snake and threatened red-legged frog. The NEPA process is particularly effective in the San Francisco Bay Area, where the public cares deeply about their public land and contributes to the development of the project. Valuable community

input was received regarding trail designation and alignment, and the alternatives considered this input.

Example 7
Seal Hazardous Mine to Protect Visitors and Install Gate to Protect Visitors and Preserve Resource Habitat (WHIS), Stabilize Keane Wonder Mine Tramway and Towers (DEVA), Install Gates to Protect Visitors and Preserve Resource Habitat at Multiple Remote Locations (DEVA) (NPS Spreadsheet page 2, rows 956, 802, and 793) – Environmental Assessment

These projects proposed to close off dangerous mines within park areas. Abandoned Mine Lands (AML) projects within the Pacific West Region all benefited immensely from the NEPA process, as it enabled the park project managers and AML program manager to think comprehensively about techniques for mine closures throughout California, share best practices and mitigations, and protect cultural resources with the development of a Programmatic Agreement with the CA State Historic Preservation Officer (SHPO) for all AML projects.

By completing the NEPA process for each of these projects, the parks took a hard look at the potential impacts of the actions. It was important to balance the public health and safety improvements with protection of the parks' natural and cultural resources.

Example 8
Close Abandoned Mine Lands within Coronado National Memorial, Grand Canyon National Park, Organ Pipe Cactus National Monument, and Saguaro National Park (NPS Spreadsheet page 2, row 785) – Environmental Assessment

The NEPA allowed the NPS to consider the actions of abandoned mine closures proposed at four Arizona parks comprehensively and on a landscape-scale. The environmental assessment evaluated the impacts associated with abandoned mine closures at Coronado National Monument, Grand Canyon National Park, Organ Pipe Cactus National Monument, and Saguaro National Park. The EA identified specific mine closure activities for each feature in the four parks, and indicated specific mitigation measures to protect sensitive cultural and natural resources. Combining public scoping and review with agency consultation efforts for abandoned mine closures at the Arizona parks provided the public with a more thorough understanding of the overall project activities, and helped to streamline the review and comment by interested and affected parties. Consultation with the Arizona State Historic Preservation Office, US Fish and Wildlife Service, Native American tribes, AZ Game and Fish Department, and other local, state, and federal agencies, was better achieved and streamlined to address the actions programmatically.

For instance, to address the protection of archeological and historic resources, the NPS consulted with the AZ SHPO to develop appropriate mine closure actions to ensure that there would be no adverse effect to historic properties listed or eligible for listing in the National Register. The NPS consulted with affiliated Native American tribes and met with a tribe to address initial concerns about the project, resulting in no further concerns. To address the potential effects on the endangered lesser long-nosed bat, the NPS developed monitoring and adaptive management

protocols to employ at mines with historic and/or known presence of the endangered lesser long-nosed bat, to ensure that there would be no jeopardy of the species. Consultation and coordination with the US Fish and Wildlife Service resulted in conservation measures that will be employed to reduce impacts to sensitive species and other wildlife in the mine areas. In general, correspondence received during the public review process supported the NPS's proposal to safeguard the abandoned mines while implementing mitigation measures to protect cultural and natural resources.

Example 9
Rehabilitate Travertine Nature Center, Chickasaw National Recreation Area (NPS Spreadsheet page 2, row 72) – Categorical Exclusion

This project involves designing and constructing energy-saving and functional improvements and repairs to the historically significant Travertine Nature Center, originally built in 1969. Primary areas of work include HVAC component and control replacement, roof replacement, upgrading of electrical system and replacement of some light fixtures, minor plumbing additions and fixture replacement.

The Travertine Nature Center is eligible for the National Register of Historic Places and is a resource contributing to the Platt Historic District. The integration of Section 106 into the NEPA process gave the park confidence that the improvements to the Travertine Nature Center would not compromise its historic integrity or characteristics. By engaging the SHPO, recommendation of materials and components ensured that the materials used for the improvements and repairs would not adversely affect the integrity or the architectural defining characteristics of the Travertine Nature Center. All of the SHPO's recommendations were added to the Scope of Work.

Attachment A- NEPA Actions Pending Over Multiple Reporting Periods

Row	Project Title	NEPA type	Reason NEPA Action Remains Pending/ Status	Projected NEPA completion date
49	Deferred Maintenance-62917: HAFE Repair/Upgrade Park Intrusion-Fire Alarm Systems in Historic and Modern Buildings	CE	Design documents still being prepared.	11/1/2010
345	Deferred Maintenance-144613: HAFE Upgrade Fire and Security Alarm Systems of the Harpers Ferry Center	CE	Design documents still being prepared.	11/1/2010
805	Abandoned Mine Lands-148785: WRST AML: Radovan Prospect Adit Closures	CE	CE pending NHPA Determination of Eligibility is currently being written. Once completed, 30-day SHPO review period will be initiated and letter of concurrence obtained before completing NEPA.	12/31/2010
942	Construction- 5375: OLYM Stormwater Separation to Mitigate Lower Elwha Flows to City of Port Angeles	EA	The funds for this project have been obligated to the City of Port Angeles, who is completing the EA. The EA is currently out for public review.	12/31/2010

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