

National Park Service
U.S. Department of the Interior
Glacier National Park
Montana



Finding of No Significant Impact

Carpenter Shop Addition

September, 2004

**FINDING OF NO SIGNIFICANT IMPACT
CARPENTER SHOP ADDITION
GLACIER NATIONAL PARK
WEST GLACIER, MONTANA**

The purpose of this project is to address the inefficient, inadequate, and unsafe facilities for Glacier National Park's Sign Shop and Paint Shop. Today's Sign Shop operations are far different from the past; designing with computer graphics requires clean space and different types of tools than were used years ago. Currently, the Sign Shop utilizes three separate buildings to design, manufacture, and store signs. Building 207, which is used primarily for storage, has severe foundation and structural problems, and it was determined that the building could not be rehabilitated to accommodate the ceiling heights needed for sign manufacturing without major structural changes to the building. These changes would threaten the National Register eligibility of the building. Buildings 245 and 960 have inadequate floor space, dust ventilation problems, no restroom, and broken concrete floors. It was determined that these buildings were too small to adequately house the sign making operations on their own.

The Paint Shop has significant lead paint, inadequate floor space, ventilation problems, wood floors, and other structural deficiencies. In 1999, OSHA issued five citations in Building 201, closing all paint spray work activities because the building's current ceiling height does not permit installation of a spray booth that meets safety requirements. Spray painting operations require higher ceilings for fire protection and adequate ventilation systems, and cement floors. Consequently, spray painting has to be conducted outdoors during the summer months and must be contracted out during the winter. A major change in the building height would threaten the National Register eligibility of the building.

PREFERRED ALTERNATIVE

The preferred alternative is to build an addition to the Carpenter Shop (building 1370) and reorganize the interior building space to incorporate the Sign Shop (currently in buildings 207, 245, and 960) and the Paint Shop (currently in building 201). The addition will provide enough space within the building to accommodate the complete design and fabrication of signs, the paint booth operations, all carpentry operations, and storage for building materials. The preferred alternative will also provide easier access for material delivery and will correct work place deficiencies and OSHA violations that cannot be resolved in the existing buildings. The Carpenter Shop has an existing paved area on its north end (the rear), frequently used by Carpenter Shop employees for construction projects during the summer months. The construction of a 40-foot addition to the building will allow this area to be used year-round by the Carpenter Shop without causing any new disturbance of soil or vegetation. Consolidating the sign shop and the paint shop with the Carpenter Shop will allow these overlapping disciplines to work more effectively and share resources including staff and equipment.

The Carpenter Shop was constructed in 1983. It measures 60' x 100' and is a wood-frame structure that is compatible with the historic district, though it is not an historic building. It has an asphaltic paved area on its north end (rear) that is the proposed location for the addition. The 40' x 60' addition will be constructed with energy efficient 2' x 6' walls and the roof will be supported by a combination of engineered trusses and rafters. The siding will be one-inch lap siding to match the existing building. The building will be painted to match the existing building.

The roofing material will be metal sheeting of the same profile and color as the existing roof. The existing large overhead door currently on the north end of the building will be salvaged and reused in the addition. The area within the Carpenter Shop currently used for storage will become the carpenter work area and the front section of the Carpenter Shop will be remodeled into a Sign Shop. The existing restroom will be renovated into a handicap accessible restroom.

The new addition to the Carpenter Shop will include a room that will meet all the National Fire Protection Association and Life Safety codes and allow for the safe operation of the spray booth year-round. The addition will also have space for material storage and an indoor workspace for large carpentry or paint projects. The building will be constructed during the summer and fall of 2004 and will allow permanent employees to work on the interior over the winter.

The buildings currently used for the Sign Shop and Paint Shop will be considered for other uses once the addition is completed. The rehabilitation of the contributing buildings for functions requiring less structural intervention than those for sign manufacturing and painting will ensure their continued use and status as contributing to the significance of the Headquarters Historic District. NEPA compliance and Section 106 review will take place when adaptive re-use plans are finalized.

Mitigation Measures

- The addition will be constructed to be compatible with the Headquarters Historic District.
- Work will begin no earlier than one hour after sunrise to minimize disturbance to wildlife and end before 7 p.m.
- Feeding or disturbing wildlife will be prohibited.
- If previously unidentified cultural resources are identified during construction activities, work will cease in the immediate vicinity of the identified resources until Section 106 procedures are complete.
- Additional mitigation measures may be identified as the project proceeds.

OTHER ALTERNATIVES CONSIDERED

A No Action Alternative was considered as required by the National Environmental Policy Act. Under this alternative, the Sign Shop would continue to operate from three different buildings, the Paint Booth would continue to be unused because of health and safety concerns, and employees would continue to work in these inadequate conditions. Spray painting would continue to be conducted only during the summer when the work can be done outdoors. Additional costs for the park would continue to accrue since spray painting during the winter would continue to be contracted out.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The environmentally preferred alternative is determined by applying the criteria suggested in the National Environmental Policy Act of 1969 (NEPA), which is guided by the Council on Environmental Quality (CEQ). The CEQ provides direction that the “environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in NEPA Section 101”:

1. fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
2. assure for all generations safe, healthful, productive, and esthetically and culturally pleasing surroundings;
3. attain the widest range of beneficial uses of the environment without degradation, risk of 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 that supports diversity and variety of individual choice;
5. achieve a balance between population and resource use that 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 Preferred Alternative best achieves criteria 2, 3, and 6 by providing safer work conditions and more efficient use of the park's resources. Consolidating the sign shop and the paint shop with the Carpenter Shop will allow these overlapping disciplines to work more effectively and share resources. The Preferred Alternative does not address criteria 1, 4, or 5 although it does not conflict with these statements. The No Action Alternative does not meet any of the criteria and conflicts with criteria 2 and 3 by not providing efficient and safe working conditions for employees. Therefore, the Preferred Alternative is the environmentally preferred alternative.

WHY THE PREFERRED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT

As defined in 40 CFR Section 1508.27, significance is determined by examining the following criteria:

Impacts that may be both beneficial and adverse.

There will be no impacts on wetlands, floodplains, prime and unique farmlands, federally listed species or special status species, cultural landscapes, archeological or ethnographic resources, museum collections, proposed wilderness, visitor use, or environmental justice from the project. There would be temporary negligible impacts to soils and vegetation due to construction activities but these would be mitigated by revegetation efforts conducted after construction, if necessary. Impacts to wildlife, water resources, air quality, natural soundscapes, and socioeconomics will also be negligible to minor, temporary, and adverse. These impacts will result from temporary increases in noise and dust during the brief construction period and the local purchase of building materials. There will be minor, long-term, beneficial impacts on public health and safety by improving work conditions for employees. The new addition will include proper ventilation and heating, and will be designed to provide a safer, more comfortable work environment. The benefits to public health and safety will be minor. This is a change from the Environmental Assessment and an errata sheet is attached. There will be minor, long-term, adverse impacts to visual resources and historic buildings and structures resulting from a visual change in the setting of the Headquarters Historic District. The new addition will be visible from several buildings that contribute to the Historic District; however, the design of the addition will be compatible with the architectural characteristics of the district and location and placement of the addition will minimize its effect on the historic character of the district's setting. There will be a moderate, long-term, beneficial impact to park operations by allowing for the indoor and year-round use of the paint spray booth and by consolidating the carpentry,

painting, and sign making operations. This will lead to sharing of resources including staff and equipment.

Degree of effect on public health or safety.

There will be a minor, long-term, beneficial impact on public health and safety by improving work conditions for employees. The paint spray booth will be safely used indoors year-round and the new addition will be designed to provide sufficient heating and proper ventilation. These changes will not be noticeable to the public. The EA stated these impacts would be negligible. This was changed because although there is no safety concern now since the paint operation has been stopped, the project will improve work conditions and therefore public health and safety.

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

The Carpenter Shop is located within the Glacier National Park Headquarters Historic District which was listed in the National Register of Historic Places in 1996. The district is significant at the state level for its association with park administrative development and for its collection of Rustic style buildings. Resources represent a continuum of development extending from 1917 to 1966. The buildings and structures are arranged in a series of concentric grids or curvilinear streets, most dating to a single and easily defined time period. All facets of National Park Service design, both in terms of style and of function are represented by buildings displaying a remarkable and rare degree of physical integrity. There are no other unique characteristics in this area.

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

None of the letters received during scoping or the EA public review period raised issues that would suggest this project would be highly controversial.

Degree to which effects on the quality of the human environment is highly uncertain or involves unique or unknown risks.

There are no effects to the human environment that are either highly uncertain or that involve unique or unknown risks.

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 buildings currently used for the Sign Shop and Paint Shop will be considered for other uses once the addition is completed. The rehabilitation of the contributing buildings for functions requiring less structural intervention than those for sign manufacturing and painting will ensure their continued use and status as contributing to the significance of the Headquarters Historic District. National Environmental Policy Act compliance and Section 106 compliance with the National Historic Preservation Act will take place when adaptive re-use plans are finalized; therefore, the action does not establish a precedent for future actions or represent a decision about a future consideration.

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

The action will not occur in conjunction with other actions to produce cumulatively significant impacts.

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

Past archeological surveys of the Glacier National Park Headquarters area have identified no archeological resources. No archeological or ethnographic resources are expected to be located in this highly disturbed area and none were identified by the Confederated Salish and Kootenai Tribes or the Blackfeet Tribal Business Council during scoping for this project. However, if resources are identified during construction the project will be halted until Section 106 review is completed.

The Headquarters Historic District is described above under “unique characteristics of the geographic area”. There will be a minor, long-term, adverse impact to historic buildings and structures resulting from a visual change in the setting of the Headquarters Historic District.

For Section 106 purposes, Glacier National Park has reached a finding of no adverse effect for the preferred alternative. The Montana State Historic Preservation Office (SHPO) concurred with this finding (August 25, 2004).

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

The project area is not known to be used by any federally-listed species; therefore, Glacier National Park biologists have determined that this project will result in no effect on federally listed species. The US Fish and Wildlife Service received a copy of the EA and determination of no effect. Further consultation is not necessary.

Whether the action threatens a violation of federal, state, or local environmental protection law.
The action does not violate any federal, state, or local environmental protection laws.

In addition to reviewing the list of significance criteria, the National Park Services has determined that implementation of the proposal will not constitute an impairment to Glacier National Park’s resources and values. This conclusion is based upon a thorough analysis of the environmental impacts described in the *Carpenter Shop Addition Environmental Assessment*, the public comments received, relevant scientific studies, and the professional judgment of the decision maker, guided by the direction in *NPS Management Policies* (December 27, 2000). Although the project has some negative impacts, in all cases these adverse impacts are the result of actions taken to preserve and restore other park resources and values. Overall, the plan results in benefits to park resources and values, and opportunities for their enjoyment.

PUBLIC INVOLVEMENT

Public scoping began with letters announcing the project and a press release issued on July 20, 2004. Letters were sent to the park’s mailing list for EAs, which includes various federal, state, and local agencies, such as the U.S. Fish and Wildlife Service (USFWS) and the Blackfeet Tribal Business Council and the Confederated Salish and Kootenai Tribes. In accordance with 36CFR800.8(c), Glacier National Park also notified the Montana SHPO and the Advisory

Council on Historic Preservation that it intended to prepare a combined Environmental Assessment/Finding of Effect for the proposed project.

Three email comments were received during scoping for this project. One email supported the proposed project. The Montana SHPO stated that they had no immediate concerns regarding the project, but they would wait to see drawings and photos before commenting further. The Tribal Preservation Office of the Confederated Salish and Kootenai Tribes had no concerns regarding the project as long as it occurred within existing disturbed areas. Two other letters were received indicating their support for the project.

The EA was mailed to the park's mailing list and interested publics on August 11, 2004, and a press release was issued on the same day announcing the availability of the EA. The EA was placed on a 30-day public review. Comments were accepted through September 20, 2004. The document was made available on the park's website. Copies of the EA were sent to appropriate federal and state reviewing agencies and the Blackfeet and Confederated Salish-Kootenai tribes.

Two comments were received during this public review period. One was a letter of support for the project. The other was a letter from the Montana SHPO concurring with the park's finding of no effect for this project.

A press release will be released announcing the availability of the FONSI. A copy will be sent to all commenters, and it will be placed on the park's web site.

Errata Sheet

Correction to Page 9: Visitor Use, Public Health and Safety.

“Visitors to Glacier National Park typically do not use the Headquarters area, with the exception of visiting the Headquarters building. The proposed project would be constructed in the middle of a large complex of buildings and would not be observed by the general public. The proposed project would not increase public safety hazards and would provide a more efficient and safe building for employees to utilize all of their equipment. ~~Therefore, the project would have a negligible effect on visitor use and public health and safety; this topic was dismissed from further discussion.~~ *The paint spray booth would be safely used indoors year-round and the new addition would be designed to provide sufficient heating and proper ventilation. Therefore the project would have a minor effect on visitor use and public health and safety; this topic was dismissed from further discussion.*”