United States Department of the Interior

NATIONAL PARK SERVICE
Pacific West Region
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San Francisco, California 94104-2828

IN REPLY REFER TO

L7617 (PWRO-P)

2 0 DEC 2012

Memorandum

To: Superintendent, Fort Vancouver National Historic Site

From: Regional Director, Pacific West Region

Subject: Environmental Compliance for East and South Barracks Master Plan

The finalized *Finding of No Significant Impact* (FONSI) for the master plan needed to guide implementation of rehabilitation or removal of specified structures, long-term operations and public use, and sustainable maintenance of the East and South Barracks is approved.

To complete this particular compliance effort, at the time when the park announces the decision, the *Errata* should be distributed to all individuals and organizations that received the supporting environmental assessment (with instructions to attach to their copy of the EA so as to have a full record of the environmental compliance completed for the project).

As noted in the FONSI, economic conditions and market trends can be expected to fluctuate in the coming years - as well as NPS funding capabilities. We will appreciate receiving periodic updates about the park's achievements in carrying out this challenging initiative.

Christine S. Lehnertz

Attachment

cc:
PWR-FM

TAKE PRIDE® IN AMERICA

FINDING OF NO SIGNIFICANT IMPACT

East and South Vancouver Barracks Draft Master Plan
and Environmental Assessment
National Park Service, U.S. Department of the Interior
Fort Vancouver National Historic Site

December 2012

INTRODUCTION

This Finding of No Significant Impact (FONSI) has been prepared in accordance with the National Environmental Protection Act (NEPA) for the *East and South Vancouver Barracks Draft Master Plan and Environmental Assessment (December 2011)* at Fort Vancouver National Historic Site in Clark County, Washington. This document describes the selected action and provides an explanation of why it will have no significant effects on the human environment. The FONSI, along with the environmental assessment (EA) and the errata prepared for the project, constitutes a complete record of the environmental impact analysis process for this proposal.

Until recently, the U.S. Department of Defense (USDOD) maintained management responsibility of the East and South Barracks, which have been used by the U.S. Army for the past 163 years. In September 2011, the U.S. Army ceased its operations at East and South Vancouver Barracks and on May 22, 2012, the U.S. Army relinquished ownership to the National Park Service, in accordance with the 1961 legislation that expanded the boundaries of Fort Vancouver National Historic Site, and with the USDOD 2005 Base Closure and Realignment (BRAC) Commission recommendations.

The property's relinquishment to the National Park Service has effectively ended the long-standing military presence at the Vancouver Barracks, which was the first major U.S. Army post in the Pacific Northwest. At this important moment in the continuing history of the site, it is of the utmost importance that the National Park Service plans for the preservation and reuse of the East and South Vancouver Barracks as part of a national park site.

The master plan is an implementation-level plan that responds to previous planning efforts at Fort Vancouver National Historic Site, such as the *Fort Vancouver National Historic Site General Management Plan* (2003), and provides more focused management direction for the East and South Barracks.

The master plan is intended to be flexible, offering future managers the background and information that will be necessary to make knowledgeable decisions for the East and South Vancouver Barracks for the next 20 years.

The implementation of the plan will depend of future funding, and the approval of this plan does not guarantee that the funding and staffing to implement the plan will be forthcoming. Implementation of all actions in the Master Plan would likely take many years and is contingent

upon future funding, market conditions, and any additional requirements for environmental compliance for site-specific actions.

PURPOSE AND NEED FOR ACTION

The purpose of the master plan is to:

- establish a comprehensive vision for the rehabilitation and public use of the East and South Barracks
- determine clear direction for future site design and development
- recommend new uses and activities for the site and its buildings that are compatible with the NPS mission, the purpose and significance of Fort Vancouver National Historic Site, the mission and goals of the Vancouver National Historic Reserve, and the character and needs of the surrounding community and region

Prior to completion of the master plan for the East and South Vancouver Barracks, no document existed specifically to guide management of the site following the relinquishment. Planning documents such as the General Management Plan for Fort Vancouver National Historic Site (2003) and the Cooperative Management Plan for the Vancouver National Historic Reserve (VNHR) (2000) provide management direction for the park and for the reserve, but do not offer in-depth guidance on the public use and rehabilitation of the East and South Barracks. Until this master plan, no plan has addressed management for these barracks to the level of detail needed. Following the relinquishment, the National Park Service inherited management responsibility for an additional 33 acres of land, which include nationally significant cultural resources. Moreover, changes in the way visitors access, understand, and use the structures and surrounding lands are expected. As a military post, public access and use of the East and South Barracks was limited, but in the future public access to, and interpretation of, the resources will be a high priority for the National Park Service. Visitation to this portion of the park is expected to rise, which will also have implications for how visitors access and experience adjacent portions of the park and surrounding lands. For all of these reasons, this area required a strong, vibrant vision and framework for management, which led to the development of the *East and South Vancouver Barracks Master Plan and Environmental Assessment*.

SELECTED ACTION (PREFFERRED ALTERNATIVE)

The National Park Service selects the preferred alternative (alternative C) for implementation. This alternative is now considered the final master plan for the East and South Vancouver Barracks.

The primary focus of the selected action is to create a dynamic, sustainable, public service campus where the history of the East and South Barracks is preserved and interpreted, and to serve as a model in integrating sustainability with historic preservation and rehabilitation. Education is a key part of this alternative. It emphasizes interpreting the history of military occupation and the Hudson’s Bay Company (HBC) in different locations throughout the barracks, as well as educating the public on environmentally sustainable practices implemented during rehabilitation and daily operations.

The selected action contains management strategies, specific actions, and a conceptual site plan for the East and South Barracks. The conceptual site plan (preferred alternative map, page 55 in the environmental assessment, and the revised map in the errata) illustrates the desired mix of adaptive reuse categories for land use in the barracks. The six reuse categories for the East and South Barracks include office, retail, interpretation/visitor services, arts/event/community use, maintenance/storage, and lodging. These reuse categories are intended to be general in order to preserve flexibility in plan implementation.

The following actions were common to all alternatives and will be incorporated into the selected action:

Adaptive Reuse: The National Park Service will be consistent with previously approved plans and pursue reuse as part of a long-term strategy for the preservation and interpretation of resources.

Ownership and Resource Protection: The National Park Service will assume and retain ownership of all structures and properties within the East and South Barracks. The National Park Service will also maintain the buildings it occupies, as well as the Hudson's Bay Company Cemetery (HBC Cemetery) grounds, and will retain final approving authority for proposed reuse and tenant improvements for all east and south barracks buildings and grounds.

Accommodating NPS Operations: The National Park Service will relocate existing administration, maintenance, and storage functions to the East and/or South Barracks.

Visitor Information, Education, and Enjoyment: The level of public access and use of buildings in the East and South Barracks will increase. Some interpretation and education will also be provided.

Sustainable Design and Development: The National Park Service will actively pursue opportunities to reduce resource consumption and improve the efficiency of building and landscape systems within the East and South Barracks. The National Park Service will consider techniques such as rainwater collection, renewable energy generation, water and energy conservation, and incentives to encourage healthy activity, public transportation, and waste reduction. All rehabilitation efforts will pursue at least a Silver LEED (Leadership in Energy and Environmental Design) rating, where appropriate.

Development Character: As appropriate, site improvements would be consistent with the City of Vancouver Historic Reserve Conservation District ordinance, which establishes standards to protect the resources and historic character of the Vancouver National Historic Reserve. The ordinance includes recommendations on the character of site furnishings, lighting, plantings, and other general improvements.

Universal Accessibility: To the greatest extent possible, site improvements and building rehabilitation would accommodate all people and abilities without the need for individual adaptation. Once building occupancy is secured, the National Park Service would ensure that requirements for public health, safety, and accessibility are incorporated into subsequent design.

For example, improvements such as accessible parking, loading zones, fire access, elevators, ramps, and other modifications would be made in accordance with the Architectural Barriers Act Accessibility Standards and the Accessibility Guidelines for Outdoor Developed Areas of 1966 (42 USC 4151).

Hudson's Bay Company Cemetery: The National Park Service would assume principal responsibility for protection, maintenance and interpretation of the HBC Cemetery grounds. No new buildings would be considered within the boundaries of the HBC Cemetery grounds.

Fort Visitor Parking: Current visitor parking at HBC Fort Vancouver would be reduced to only a few accessible spaces and a drop-off. As funding allows, primary parking for the fort visitors would be relocated either to the East or South Barracks.

Partnerships: The National Park Service would continue to engage VNHR partners and others in planning and activities in the East and South Barracks. NPS staff would also encourage new partnerships as opportunities arise.

The following are the primary actions of the selected action:

Adaptive reuse for use by the National Park Service and partners: Under the selected action, the National Park Service will have the option to move administrative functions to either building 991 or building 993, based on future management and staffing options. A portion of either building 991 or building 993 could accommodate living history and special events, cultural demonstrations, and costume collections, numbering over 4,000 items and growing by approximately 15% each year. The costumes and accessories are essential props for interpretive programs that include living history events, cultural demonstrations, and educational training programs. The space for the costume department would include secure costume and accessory storage, workrooms for fabrication and repair, office space for cataloging and recordkeeping, lockers, and changing rooms. Building 400 would become the primary NPS maintenance facility, and building 401 would be retained for associated NPS maintenance use and storage. Building 753 may also be suitable for NPS maintenance storage. Building 405 would be rehabilitated as a regional museum management facility for the National Park Service, partners, and the public. Buildings 402 and 404 could be used for maintenance or storage use by the Fort Vancouver National Trust, U.S. Forest Service, or other partners.

Buildings for use by other tenants: The National Park Service would seek to attract public agencies and organizations with compatible missions to the National Park Service to occupy office spaces. In addition to office use, a mix of other uses that integrates well with the rest of the Vancouver National Historic Reserve would be encouraged. These uses may include nonprofit and community functions and limited commercial uses such as retail shopping, restaurants, and day care. Overnight accommodations may be provided to support conferences, environmental field schools, school groups, and elder hostel groups. General residential use by the public is not anticipated under this alternative.

Cultural landscape treatment: Over time, the cultural landscape would be rehabilitated to support the multiagency campus concept and increased visitation. Major objectives of landscape

rehabilitation would include the depiction and interpretation of historic conditions, with a focus on HBC history in the South Barracks, and early to late military history in the East Barracks.

In the East Barracks, the military landscape would be preserved, rehabilitated, and interpreted. Where feasible, restoration of the Oregon white oak woodlands priority habitat would be completed in accordance with recommendations from Washington Department of Fish and Wildlife. For example, the National Park Service would explore revegetating the Mobile Army Surgical Hospital (MASH) site with Oregon white oaks. To improve resource conditions, visitor experience, building conditions, and public safety, the National Park Service would also choose not to replace diseased or damaged Douglas firs along the southern edge of the Parade Ground, which are noncontributing landscape features. The gravel parking lot at the HBC Cemetery would be removed and replaced with turf or other materials in order to create a contemplative, park-like setting. Throughout the East and South Barracks, the plant palette would emphasize drought tolerant historic species dating to late military historic periods, as well as some compatible native plant species where appropriate. The National Park Service would adjust approximately .55 acres of the park boundary to include the western side of Fort Vancouver Way so that the National Park Service would own and be responsible for all HBC Cemetery grounds.

In the South Barracks, building 422 would be demolished (subject to appropriate compliance) to allow extended restoration of the HBC cultural landscape. As feasible, this landscape rehabilitation would include expanding the HBC Garden and Orchard, reconstructing the Summer House and the historic maple allée, and establishing an interpretive loop trail that connects visitor areas to various aspects of the historic site. The maple allée would be integrated with the screening and fencing of the maintenance yard. The Fort Vancouver Village would continue to be a focus for interpretation and archeological investigation. In accordance with the site's long-range interpretive plan and the Fort Vancouver Village development concept plan, particular emphasis would be placed on reestablishing landscape features and on interpreting the houses representing the diverse, multicultural population of the Fort Vancouver Village and the sites and roadway between buildings 405 and 404 in the northern portion of the village. Interpretive activities or projects for this area may include reconstruction, living history events, exhibit panels, talks, tours, demonstrations, educational programs, and park-sponsored special events. Interpretation of the historic "Crossroads of the Pacific Northwest" would also be provided at the former MASH site or within the northern portion of the village. Interpretive activities could also occur on a pedestrian trail along a converted stretch of Alvord Road.

Development character: Newly designed features such as shuttle stops, crosswalks, plazas, lighting, benches, street trees, picnic facilities, bike racks, and other site furnishings would be permitted and designed in accordance with accessibility standards (2004 Architectural Barriers Act, Section 508 and 2009 Accessibility Guidelines for Outdoor Developed Areas) and the historic setting. In keeping with the selected action's emphasis on sustainable practices (LEED and Sustainable Sites Initiative), the National Park Service would explore the use of cisterns for rainwater capture, solar panels, geothermal heat sources, and other technologies in ways that do not intrude on the cultural landscape, yet provide opportunities for educating the public on these practices. East Barracks buildings would be repainted consistent with the paint scheme used at Officers' Row and the West Barracks. However, pending further research, NPS staff may explore restoring one or two East Barracks buildings to a historic paint scheme for interpretive

purposes. Where allowed by policy and code, temporary and nonhistoric changes to buildings made by the U.S. Army would likely be reversed under this alternative, e.g., fire escapes and temporary access ramps. For plantings throughout the site, historic plant species would be preferred, with an emphasis on historic species that are drought tolerant. Some native species would be included where appropriate. The National Park Service would upgrade the utilities and replace overhead utility lines in an underground system, as described in the *Schematic Design Report for Fort Vancouver National Historic Site East and South Barracks Utility Upgrades* (2010).

Construction activity: Three contributing historic structures (buildings 422, 749, 750) and three noncontributing structures (buildings 409, 710, 787) would be demolished. All other buildings are slated to remain on site and be rehabilitated as appropriate tenants and funding are secured. New building construction will be limited and proposed only if it is essential to support public use, enjoyment, and understanding. For example, construction of new buildings in the South Barracks would be limited to historic reconstructions and covered storage for NPS maintenance functions in the westernmost portion of the South Barracks. The National Park Service would proactively maintain building exteriors of remaining structures to maximize resource protection, energy efficiency, and water conservation, as feasible. In addition, NPS staff would seek to model and interpret these and other sustainable construction and maintenance practices for the public.

Visitor use and experience: The National Park Service would attempt to create visitor experiences that foster a sense of interconnectedness with other park and VNHR resources. Public access would be increased as a larger number of buildings would be rehabilitated for occupancy and visitor use. Visitors would enjoy opportunities to learn about the work of agencies on campus, because tenants of buildings along the Parade Ground would be encouraged to provide public access, interpretive exhibits, and public restrooms in building foyers. Visitors would also have opportunities to learn about the concept of sustainability and how it may be achieved within the context of historic preservation and rehabilitation. Environmentally sustainable practices and technologies—both in the rehabilitation of buildings and landscape treatment—would be demonstrated in ways that educate the public.

Public spaces in some rehabilitated historic buildings would be refurnished to recreate the historic appearance of U.S. Army barracks buildings. For example, a prominent interpretive exhibit could be located in the park headquarters building (in either building 991 or building 993) and would be rehabilitated to a more historic appearance. This key visitor attraction would enable the National Park Service to better interpret early military history, which is part of the park's legislated purpose. In order to complement the direct, person-to-person interpretation occurring elsewhere in the Fort Vancouver National Historic Site, the National Park Service would provide interpretive opportunities primarily through non-personal services such as interpretive waysides, self-guided walking tours, digital and personal media, and modest displays within foyers, such as interior interpretive panels. The design of the interpretive exhibits and spaces would follow sustainable design and accessibility standards and would emphasize environmental sensitivity in constructing the exhibits by using nontoxic materials, conserving resources, and recycling materials. The National Park Service would also host public demonstration events related to cultural heritage, such as American Indian history and culture, as

well as educational events on sustainability. Programs and media would also be developed to interpret the trail associated with the restored maple allée in the South Barracks.

The rehabilitation of building 405 as a regional museum management facility would provide both curation space for artifacts as well as increased opportunities for the public to appreciate and learn about the region's archeological and museum resources.

The National Park Service would also promote retail use of building 410 in order to serve as a central gathering place for the high number of visitors to building 405, the Discovery Trail, and Fort Vancouver. Public restrooms would be made available in building 410, as well as in key buildings throughout the site. Healthy food options and the local use of food grown in the HBC orchard and garden would be encouraged, as well as themed dining opportunities in keeping with historic U.S. Army traditions. Special events ccould also be accommodated, consistent with NPS Management Policies, laws, and regulations.

Access, circulation, and parking: The circulation for pedestrians and motorists would be enhanced over time throughout the site to create a welcoming and safe environment. The National Park Service will reduce paving, remove barricades and fences, and structure a safer, more coherent and logical experience for motorists and pedestrians. Use of sustainable stormwater management approaches such as porous pavements will be explored and where appropriate, implemented in a manner that respects the cultural landscape. Wayfinding aids would be installed to help revitalize the urban interface. Sidewalks will be repaired and extended, and a new interpretive trail would be added through the reconstructed historic maple allée. Trail improvements will be coordinated with similar efforts in the surrounding areas pursued by the Vancouver National Historic Reserve and other partners.

Primary parking for visitors to the reconstructed fort will be relocated to the area east of building 405 and west of building 410. The future site design of this area will integrate parking with new pedestrian connections between the Discovery Trail, building 405, and the fort, as well as with the adjacent restoration of the HBC orchard and garden. Internal roads would selectively be redesigned to improve circulation, safety, drainage, and appearance. Pending further study, one of the internal roads in the East Barracks would be extended eastward to connect with Park Road. This new connection would weave together the East Barracks with the rest of the park and create convenient circulation among park destinations (e.g., the fort, visitor center, and new NPS administration located in either building 991 or building 993). Alvord Road may be realigned at the southern end to meet East Fifth Street to improve pedestrian and vehicular safety, in which case the existing southern portion of Alvord Road from building 733 to East Fifth Street would be converted to pedestrian use only to provide for interpretation of the "Crossroads of the Pacific Northwest." Extraneous roads and parking areas throughout the site (e.g., spur to building 710, minor drives between buildings 721 and 722 and between 752 and 753) may also be removed.

The National Park Service will remove extraneous parking lots, such as the gravel lot and the small lot west of building 721, that lie on top of the HBC Cemetery. The National Park Service will also enhance the authenticity of the historic setting by removing asphalt at the bases of

buildings 987, 989, 991, and 993, where appropriate. Parking in this area will be limited to a small number of close-in handicap parking spaces, drop-off areas, and service access.

The selected action provides overall direction for access, circulation, and parking at the East and South Barracks that can later inform, and be further refined, through subsequent design. As part of future efforts, the need for additional parking and changes to traffic patterns will be further evaluated. The National Park Service may limit the expansion of new surface lots in order to minimize damage to archeological and other resources. New lots may be added, as specific building needs, occupation levels, and funding become secured over time. NPS staff would also pursue collaborative parking solutions with the City of Vancouver and other partners, including shared parking on sites external to the project area. The potential construction of the multimodal community connector bridge over Interstate 5 and potential redevelopment of buildings in close proximity to the project area may also affect the viability of specific recommendations contained within the plan. Preferred parking for carpools and vanpools would also be considered. Most fleet parking would be located in the western portion of the South Barracks to accommodate expanded restoration of the HBC Village. Parking for tour buses, recreational vehicles, and trailers would be accommodated in the new Fort visitor parking lot, located east of building 405 in the South Barracks.

Park operations: The National Park Service would need to increase staffing levels to accommodate expanded operations and needs. For example, a business manager would handle leases or other agreements possibly through property management companies and work with government contracting officers. Under this alternative, the National Park Service would strive to attract long-term tenants, with an emphasis on federal and other public agencies, which may help support this effort. This alternative would also require additional facilities and grounds maintenance staff, as well as several positions dedicated to the rehabilitation and reuse of the historic barracks buildings. Maintenance and cultural resource employees would ensure that all buildings and grounds are properly maintained and strive to increase use of sustainable maintenance practices. Attracting federal agencies to become long-term tenants would help further these efforts, as federal agencies are bound by executive orders on sustainability that require reduced resource consumption and increased use of sustainable technologies and practices. Curatorial and cultural resources staffing for building 405, as well as other locations throughout the barracks, would also be needed. Additional positions would be needed to address increased workload in the areas of resource management and law enforcement. The National Park Service would seek to defray costs to the government with income generated through lease agreements from tenants and would work with its partners as they consider the various options available to accomplish this work. It is intended, and expected, that future maintenance costs for any building not directly used or occupied by the National Park Service for operational or visitor use would be fully supported by revenue derived from the lessee.

MODIFICATIONS TO THE SELECTED ACTION

There are no modifications proposed to the preferred alternative described in the environmental assessment, as a result of public comment or reconsideration.

However, the access and circulation components of the selected action are intended to be conceptual and subject to change based on safety concerns, resources, or other more detailed site design issues. The National Park Service will complete additional transportation planning and site design, based on generic building uses tied to the plan and will address safety-related issues; this additional planning may prescribe changes to the access, circulation, and possibly parking to those options analyzed in the environmental assessment.

In particular, the plan recognizes the need that Park Road should connect to the East Barracks, and there are three alternatives for this connection. The selected action recognizes McClellan Road as the preferred extension route, pending further study. The future transportation site planning may indicate that Hatheway Road or the unnamed road to the south of Hatheway Road may be a better route for such an extension.

Additionally, as economic conditions and market trends may change over the years, the National Park Service may need to consider a variety of requests for the reuse of the historic structures, some of which may differ from the uses shown on the conceptual site plans. Under all circumstances though, the primary focus of the selected action—Fort Vancouver National Historic Site is a dynamic, sustainable, public service campus—would remain intact.

If a use for the barracks is considered that differs substantially from the use identified in the master plan conceptual site plan, the National Park Service will carefully analyze the new use, ensure that it is consistent with the focus of the master plan, and assess the environmental impacts of the proposal. Any changes to building use, circulation, or parking that substantially differ from the master plan or that could result in a greater level of environmental impact than were analyzed in the environmental assessment would require additional environmental and/or cultural compliance.

RATIONALE FOR THE SELECTED ACTION

The selected action represents the mix of potential future uses, management actions, and site planning concepts that the National Park Service believes best supports the mission of the National Park Service, the legislated purpose of Fort Vancouver National Historic Site, and the vision and goals for the *East and South Vancouver Barracks Draft Master Plan and Environmental Assessment.*

It also complies with the Federal Management Regulation (41 CFR 102-79.55), which in part states, “[f]ederal agencies must assume responsibility for the preservation of the historic properties they own or control. Prior to acquiring, constructing, or leasing buildings, agencies must use, to the maximum extent feasible, historic properties already owned or leased by the agency.”

In January 2011, the National Park Service held a workshop using a decision-making process called “choosing by advantages” to evaluate the draft alternatives and develop an agency preferred alternative. NPS personnel from Fort Vancouver National Historic Site, the Pacific West Regional Office, the Denver Service Center (DSC), and Golden Gate National Recreation Area took part in the workshop, along with representatives from the City of Vancouver and the

Fort Vancouver National Trust. This evaluation considered a range of information including anticipated environmental impacts, a preliminary assessment of financial viability, and preliminary costs estimates for capital development and ongoing operations. Attendees compared and rated the advantages of each alternative. The following six evaluation factors were used to address key aims of management, which had been set forth earlier in planning in the master plan vision and goals:

1. retention and adaptive reuse of historic structures
2. protection of archeological resources and museum collections
3. preservation of cultural landscape features and patterns
4. promotion of public use, enjoyment, and appreciation
5. efficient operations for the National Park Service and partners
6. environmental sustainability

Workshop participants agreed that draft alternative C, combined with certain actions from other draft alternatives, offered the most advantages as well as the greatest advantage overall.

For example, it was decided that more than all other draft alternatives it promoted environmental sustainability and public use and enjoyment the most, as well as best encouraged efficient NPS operations. It also retains the highest number of historic structures (17 of 20), and the adaptive reuse of most of the buildings as office and retail would be more consistent with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*, than the other alternatives.

OTHER ALTERNATIVES CONSIDERED IN THE ENVIRONMENTAL ASSESSMENT

The environmental assessment analyzed two other action alternatives (alternatives B and D), as well as a no action alternative (alternative A).

Alternative A, the no action alternative, described how the National Park Service would manage the barracks according to the *Fort Vancouver National Historic Site General Management Plan* (2003) and other relevant policies. The primary land uses in this alternative would be NPS administrative, maintenance, and storage functions with buildings occupied by NPS and VNHR partners. The National Park Service would not actively seek additional tenants. Building 409 would be removed although no substantial changes would be made to the appearance of the barracks and no major rehabilitation efforts would be undertaken.

Alternative B, "A Vibrant, Urban District in a Historic Setting," focused on creating a vibrant urban district in the East and South Barracks to complement downtown Vancouver and the surrounding community with a variety of land uses, including retail, office, and residential. The primary land uses in this alternative were NPS administrative, maintenance, storage, and curatorial functions as well as a mix of offices, businesses, shops, restaurants, art galleries, and residences for the public. There would be a heavy emphasis on commercial use (restaurant, office, etc.). This alternative proposed the removal of two contributing historic structures (buildings 749, 750) and three noncontributing structures (buildings 409, 710, 787)

Alternative D, "A Historic, Educational Campus for All," placed a heavy focus on educational, community, and nonprofit uses that support the focused interpretation of site-specific history, including HBC history (1829–1860) south of East Fifth Street and U.S. Army history (1901–1948) north of East Fifth Street. Buildings would be rehabilitated to serve as offices, classrooms, community spaces, and for a limited amount, complementary commercial services. One contributing historic structure (building 422) and four noncontributing structures (buildings 401, 409, 410, 710) were proposed for removal in this alternative.

ALTERNATIVES CONSIDERED BUT DISMISSED

Removing Buildings and Infrastructure within the Hudson's Bay Company Cemetery

During the planning process, NPS staff attended a meeting with the Affiliated Tribes of Northwest Indians. At this meeting, some participants expressed a variety of concerns, ranging from a general desire to preserve remaining subsurface elements of the HBC Cemetery in situ; to some level of commemoration of the HBC Cemetery; to, in at least one instance, the desire to see all buildings, trails, roads, infrastructure, and the Clark County War Veterans Memorial, currently located within the HBC Cemetery, removed to restore a park-like setting to the area.

The planning team discussed these concerns and decided that removing historic buildings on the National Register of Historic Places, especially those that act as contributing resources to the VNHR historic district, runs counter to national laws and policies. Buildings 721, 722, and 987, which are located on HBC Cemetery grounds, help establish the historic character of the whole district. Therefore, their removal would negatively affect the interpretation and visitor experience of this intact, historic military landscape. It is important to state, however, that this decision was not made lightly. It is recognized that the HBC Cemetery is of high significance to the VNHR historic district and as the resting place of people from many nations, including American Indian tribes and Native Hawaiians, and thus requires a respectful and thoughtful approach to management. It is expected that consultation with the direct descendants of people buried in the HBC Cemetery and appropriate American Indian tribes and Native Hawaiian groups will be ongoing.

Partial solutions to these challenges were explored. For instance, alternatives explore removing asphalt and gravel parking areas that were built on the HBC Cemetery grounds in order to expand and enhance the cemetery's park-like setting. In all cases, the National Park Service will maintain full responsibility for management of the cemetery grounds and would expand park boundaries to include a portion of Fort Vancouver Way so that the National Park Service will own and be responsible for all HBC Cemetery grounds.

The replacement of utilities was also discussed prior to and during the planning process for the East and South Barracks. The utilities serving the barracks are failing and in need of replacement if barracks buildings are to adequately serve future tenants. In preparation for, and in support of, this planning process, the National Park Service developed several alternative alignments for Vancouver Barracks utility corridors in order to study various ways of minimizing impacts to human remains in the HBC Cemetery, while still providing much needed upgrades for future

tenants of the barracks buildings. In consultation with tribes, NPS staff selected a preferred alternative that established the preliminary schematic design for utility upgrades. For example, the preferred alignment at the schematic design stage would follow the existing utility corridor through the HBC Cemetery along Fort Vancouver Way. Through this design and consultation process, it was determined that in accordance with the National Historic Preservation Act (NHPA), replacing utilities along an existing corridor would likely not disturb intact graves and cause the least damage to the cemetery. These competing resource issues will continue to require ongoing and timely consultation with the tribes. In all cases, the National Park Service will consult with tribes to further define treatment and management of the cemetery grounds. Cultural resources staff at the park will continue to consider and evaluate potential solutions to these issues and will thoughtfully and respectfully consult with tribes.

Management of the Site as a Museum

Previous approved plans, such as the *Fort Vancouver National Historic Site General Management Plan* (2003), *Vancouver National Historic Reserve Cooperative Management Plan* (2000) and *Vancouver National Historic Reserve Cultural Landscape Report* (2005), established adaptive reuse as the overarching preservation strategy for historic structures. These plans recommend a mix of public and private uses for Barracks buildings. Therefore, the National Park Service will adhere to these previous plans and pursue reuse as part of a long-term strategy for the preservation and interpretation of the site's nationally significant resources. The National Park Service will not preserve the entirety of the East and South Barracks for the purposes of interpretation only.

MITIGATION MEASURES

Number	Mitigation	Responsible Party
CULTURAL RESOURCES		
CR-1	***Preconstruction Field Surveys:*** Where not already completed, professional archaeologists would perform surveys prior to ground disturbance in areas previously undisturbed.	NPS Archaeologist
CR -2	***Preconstruction Training:*** National Park Service cultural resources staff would provide training for all personnel involved with ground disturbance activities to facilitate recognition of potential archeological materials and to avoid impacts to deposits.	NPS Archaeologist
CR-3	***Archeological and American Indian Monitoring:*** NPS cultural resources staff would ensure that there is an archeological monitor present (and would give an opportunity to any of the 26 consulting federally recognized tribes to have a monitor present as well) during ground-disturbing activities in the vicinity of recorded archeological resources. While the goal of the National Park Service is to preserve archeological resources, this mitigation measure would ensure that if additional deposits	NPS Archaeologist

Number	Mitigation	Responsible Party
	associated with known sites are discovered, there would be an archaeologist and possibly an American Indian representative on site to identify and immediately assess the find and impacts and to halt construction, if appropriate.	
CR-4a	***Previously Undiscovered Cultural Resources, Inadvertent Discoveries:*** If buried cultural resources are inadvertently discovered during ground-disturbing activities, work shall stop in that area and within a 100-foot radius of the find until a qualified archaeologist can assess the significance of the find. Alternatively, an archaeologist and possibly an American Indian representative may monitor ground disturbances in the vicinity of the site to ensure that such discoveries are protected until they can be properly recorded and assessed and management decisions can be made about their treatment. Avoidance in place or no adverse effect from project actions is the preferred approach to all discoveries that are potentially eligible for listing on the national register. Inadvertent discoveries would be treated in accordance with 36 CFR 800.13 Protection of Historic Properties: Post-review Discoveries. The archeological resource would be assessed for its integrity and whether it contributes to eligibility for listing on the National Register in consultation with the Washington State Department of Archaeology & Historic Preservation (DAHP) and other consulting parties, and a determination of the project effects on the property would be made. If the site would be adversely affected, a treatment plan would also be prepared as needed during the assessment of the site's significance. Assessment of inadvertent discoveries may require archeological excavations or archival research to determine resource significance. Treatment plans would fully evaluate avoidance, project redesign, and data recovery alternatives before outlining actions proposed to resolve adverse effects.	NPS Archaeologist
CR-4b	***Previously Undiscovered Cultural Resources, Discovery of Human Remains***: If human skeletal remains are encountered, all work shall stop in the vicinity of the discovery, and the find would be secured and protected in place. The Clark County coroner and park archaeologist would both be immediately notified. If a determination finds that the remains are American Indian or Native Hawaiian and that no further coroner investigation of the cause of death is required, the remains would be treated in accordance with the Native American Graves Protection and Repatriation Act (NAGPRA) regulations (43 CFR 10.4 Inadvertent Discoveries). If the remains are historical, but	NPS Archaeologist

Number	Mitigation	Responsible Party
	not American Indian or Native Hawaiian, then disposition of the remains will be determined through further analysis and consultation with DAHP, other consulting parties, and lineal descendants, if known.	
CULTURAL RESOURCES		
CR-5	***Cultural Resources Monitoring Plan:*** A cultural resources monitoring plan would be prepared to ensure that ground-disturbing activities within the project area result in no adverse effects to buried resources. The monitoring program would include oversight of project schedules and excavation areas to ensure that important opportunities for archeological discovery are realized, and that potentially buried archeological deposits are recognized in the course of active excavation and restoration. If archeological resources are found that could be adversely affected by the proposed project, the National Park Service shall comply with mitigative measure CR-3.	NPS Archaeologist
CR-6	***Treatment of Historic Properties and Landscape:*** ▪ Building and landscape rehabilitation would conform to *The Secretary of the Interior's Standards for the Treatment of Historic Properties*. ▪ Recommendations provided in the *Historic Structures Report Part I: Historical Background and Context, Vancouver Barracks, East Barracks Vancouver National Historic Reserve* (Krafft and Krafft 2010) would be used to guide design work for the project area. ▪ Guidelines for compatible new construction (such as outdoor gathering areas, covered storage, HBC Summer House reconstruction, and landscape features such as plazas and outdoor furnishings) would be prepared to ensure compatibility of new building construction and the introduction of other new elements into the historic setting and would be subject to review and approval by the National Park Service. ▪ In consultation with federally recognized tribes and the Washington State DAHP, a cemetery management plan for the HBC Cemetery would be drafted and the policies and guidelines within this plan would be adhered to during future management of the cemetery area.	NPS Cultural Resource Specialists
CR-7	***Lighting:*** Any new lights would be compatible with the cultural landscape and shielded so that light is directed downward to prevent light pollution of the night sky.	NPS Cultural Resource Specialists
CR-8	***Visual Character:*** All construction, staging, and stockpile access will be gated and kept locked except when in use.	NPS Cultural Resource Specialists

Number	Mitigation	Responsible Party
CR-9	***Protection of Oregon white oak:*** Management of Oregon white oak will comply with Washington Department of Fish and Wildlife guidelines (Larsen and Morgan 1998) for treatment of Oregon white oak trees. These may include management actions such as ▪ no cutting of Oregon white oak woodlands except for habitat enhancement ▪ selectively harvesting individual oaks to improve stand age-class and structural diversity ▪ thinning encroaching conifers in oak woodlands ▪ retaining large, dominant oaks ▪ retaining contiguous aerial pathways ▪ planting Oregon white oak acorns and seedlings ▪ protecting Oregon white oaks with construction fencing while using heavy equipment nearby	NPS Cultural Resource Specialists and NPS Facility Manager
CR-10	***Use of Sedimentary Fill to Encapsulate Contaminated Soils:*** In situations such as environmental cleanup and remediation where archeological resources eligible for listing on the national register cannot be avoided, soil treatment options may include encapsulation of contaminated soils with clean sedimentary fill. In such a situation, consistent with best archeological practices, it is recommended that a layer of plastic-based geocloth (or equivalent) be applied over the original ground surface to indicate that the sedimentary fill postdates the 20th century. Landscape-appropriate plantings can be placed within the new sedimentary fill to help blend the area into the surrounding existing cultural landscapes.	NPS Facility Manager
Air Quality		
AQ-1	***Save the Air Measures:*** The National Park Service would work with all tenants of rehabilitated properties to encourage the use of mass-transit or bicycling options for commuters to the campus; especially on days when air pollution concentrations exceed U.S. Environmental Protection Agency (USEPA) recommended levels.	NPS Facility Manager
AQ-2	***Construction Vehicles:*** Contractors will use hydraulically or electrically powered construction equipment when feasible. Contractors will limit the idling of motors except as necessary. All equipment engines will be maintained in good condition, in proper tune (according to manufacturer's specifications), and in compliance with all state and federal requirements.	NPS Facility Manager
AQ-3	***Construction Dust:*** To reduce dust and fine particles from becoming airborne during construction activities, truck beds would be covered with tarps or have at least two feet of freeboard. Soil stockpiles will be covered or watered daily. All	NPS Facility Manager

Number	Mitigation	Responsible Party
	paved access roads, parking areas, and public streets would be swept, as appropriate, when soil material is visible.	
AQ-4	***Indoor Air Quality:*** Use low volatile organic compounds (VOC) paints, solvents and other chemicals and materials in building rehabilitation.	NPS Facility Manager
Visitor Experience		
VE-1	***Accessibility:*** The project would conform to the Americans with Disabilities Act / Architectural Barriers Act Accessibility Guidelines (U.S. Access Board, July 2004), the 2009 draft accessibility guidelines for outdoor developed areas prepared by the U.S. Access Board Regulatory Negotiation Committee, Section 508, and other relevant and current guidelines.	NPS Facility Manager
VE-2	***Timing:*** Whenever possible, construction work that could potentially affect visitor experience would be scheduled during times of lowest park visitation.	NPS Facility Manager
VE-3	***Construction Related Noise Control:*** All equipment would be operated and maintained to minimize noise. No equipment would be operated with an unmuffled exhaust. Contractors would limit the idling of motors except as necessary (e.g., concrete mixing trucks). Noise-generating construction activities would be limited to approved hours of operation to minimize the impacts on visitors. The National Park Service may restrict construction activities during peak use hours/days, such as holidays and weekends, to minimize disruption to visitors.	NPS Facility Manager
VE-4	***Construction Exclusion Areas—Visitor Restrictions:*** During construction, the National Park Service would ensure that all active construction, staging, and stockpile areas are fenced to render them inaccessible to the public. All construction, staging, and stockpile access would be gated and kept locked except when in use. Signs would be conspicuously posted to inform the public about the need for caution and to safely route visitors around construction areas. Established and maintained walkways would be provided across the site, as well as barrier fencing along trails and paths.	NPS Facility Manager
VE-5	***Visitor Notification:*** Information regarding construction projects or activities that could affect visitors would be shared with the public via the park website, signage, rangers, press release, a park newsletter, Twitter, Facebook, or other means to enhance public understanding of the project and to help them better plan their visits.	NPS Facility Manager
VE-6	***Event Guidelines:*** The National Park Service will ensure that events at the East and South Barracks are appropriately sized and that the location, frequency, duration, and nature of events in the barracks are compatible with the uses and the character of the	Superintendent

Number	Mitigation	Responsible Party
	site and protective of park resources.	
Traffic, Parking, and Circulation		
TPC-1	***Parking and Traffic Plan:*** The National Park Service will complete a comprehensive parking and circulation plan to further identify road closures and alignments and define parking needs, locations of parking lots, and pedestrian trails. This will be completed prior to any construction on the road or parking system in the East and South Barracks.	NPS Project Manager
TPC-2	***Construction Traffic Control Plan:*** A traffic control plan will be developed to provide information on construction phases and duration, traffic scheduling, staging area management, visitor safety, construction equipment travel routes, detour routes, parking area closures, and pedestrian and bicyclist movements on adjacent routes.	NPS Project Manager
TPC-3	***Transportation Initiatives:*** The National Park Service will develop and implement strategies to reduce automobile use and parking requirements, alleviate traffic congestion, and enhance transportation safety. Each tenant would be encouraged to implement these initiatives, which would be integrated into the overall program for the site.	NPS Project Manager
Park Operations		
PO-1	***Utilities:*** ▪ Utility/infrastructure work that requires interruptions in service would be coordinated at least 60 days in advance between NPS staff and other users who may be affected. ▪ Length of outages would be kept to a minimum and scheduled during nonpeak usage hours, when possible, to reduce economic impact on concessions, other users as well as visitor inconvenience.	NPS Project Manager and Facility Manager
PO-2	***Water Demand Management Best Management Practices:*** The National Park Service, in cooperation with its tenants and residents, would continue to implement best management practices (BMP) that encourage water conservation. Given the evolutionary nature of water conservation measures, the National Park Service would make provisions for the removal or addition of BMPs as the technical and economic reasonableness of measures are determined. Current BMPs include: ▪ continuing to identify and repair leaks to reduce distribution system losses ▪ installing water meters and develop a consumption-based billing system to discourage inefficient use of water ▪ monitoring tenants' meters, water heaters, and plumbing fixtures	NPS Project Manager and Facility Manager

Number	Mitigation	Responsible Party
	▪ installing water-conserving devices as part of all building rehabilitation projects; retrofit requirements include installation of low-flow toilet and shower fixtures, faucet aerators, and recycled water irrigation systems (in areas where recycled water is or will be available) ▪ discouraging the use of additional water for new landscaping or expansion of existing facilities unless the landscaping designs and plant materials are low water use and irrigation systems are water efficient ▪ participating in efforts being made by other water management agencies to identify additional conservation programs	
PO-3	***Water Shortage Emergency Response:*** As a retail customer of the City of Vancouver Water System, the National Park Service will follow all water shortage response plans and water rationing plans recommended or mandated by the City of Vancouver.	NPS Project Manager and Facility Manager
Health, Safety and the Environment		
HZ-1	***Hazardous Spill Plan:*** A hazardous spill plan will be completed prior to any construction.	NPS Project Manager and Facility Manager
HZ-2	***Vehicle Maintenance:*** All equipment used within the park for operations and construction would be maintained in a clean and well-functioning condition to avoid leaks and contamination of resources from mechanical and automotive fluids. Contractor vehicles and equipment maintenance activities would be conducted off site. If maintenance must occur on site, designated maintenance areas will not directly connect to the ground or the storm drainage system to prevent the run-on of stormwater and runoff of spills. Secondary containment, such as a drain pan or drop cloth to catch spills or leaks, would be used when removing or changing fluids.	NPS Project Manager and Facility Manager
Geology, Soils and Stormwater Management		
GS-1	***Soil Stockpiles:*** No stockpiled soils shall remain exposed, unless surrounded by properly installed and maintained silt fencing or other means of erosion control.	NPS Archaeologist and Facility Manager
GS-2	***Soil Reuse:*** Soils excavated during ground-disturbing activities will be reused to the extent that these locally derived materials are found to be clean and weed-free.	NPS Archaeologist and Facility Manager
GS-3	***Stormwater Pollution Prevention Plan:*** Prior to construction work, a stormwater pollution prevention plan (SWPPP) will be prepared when required. The SWPPP will identify all pollutant and sediment sources that may affect stormwater discharges from the construction sites, identify and implement BMPs to control	NPS Project Manager and Facility Manager

Number	Mitigation	Responsible Party
	erosion and runoff, and reduce or eliminate these pollutants and sediments during construction and post-construction, and develop a maintenance schedule for post-construction BMPs. The SWPPP will be submitted to the park for review/approval prior to construction activities. Trenching and grading operations using manual or heavy equipment would follow industry standard stabilization methods. After trenching and grading is completed, backfill, compaction, and regrading operations would be initiated as soon as possible to establish and maintain stable soil surfaces. Soil surfaces would be treated, and restoration within approved NPS guidelines and specifications would be performed.	
Wildlife		
NR-1	***Nesting Bird and Raptor Protection Measures:*** To the greatest extent possible, removal of trees would occur outside of breeding season, which is generally January through July for raptors, and March through July for other land birds.	NPS Facility Manager

WHY THE SELECTED ACTIONS WILL NOT HAVE A SIGNIFICANT EFFECT

The National Park Service used the following NEPA criteria and factors defined in 40 CFR 1508.27 to evaluate whether the selected action would have a significant effect on the quality of the human environment:

Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts that require analysis in an environmental impact statement

The environmental assessment addresses the likely impacts to historic structures; cultural landscapes and vegetation; archeological resources; museum collections; air quality and climate change; visitor resources; socioeconomic factors and land use; park operations; and health, safety, and the environment. Whether taken individually or as a whole, the impacts of the project do not reach the level of significance.

Overall, there would be beneficial, long-term, cumulative impacts to historic structures at the site. Rehabilitation of historic buildings would result in an improved state for these structures and new uses of the historic structures and rehabilitation activities would be completed in accordance with *The Secretary of the Interior's Standards for Historic Structures*; as such, potential impacts would be limited to negligible to minor levels. Removal of three historic structures would result in moderate adverse impacts to the structures themselves, and the removal of two of these buildings (749 and 750) would have moderate adverse impacts on the Vancouver Barracks cultural landscape as well. Other actions, such as rehabilitation of the structures in the barracks and cultural landscape rehabilitation would have beneficial effects on

cultural landscapes. Vegetation treatments and modification to parking, roads, and sidewalks would have minor to moderate impacts on the cultural landscape. Impacts to archeological resources from the selected action would be minor, adverse, and long term. When combined with the Columbia River Crossing (CRC) project, there could be moderate, adverse, long-term, cumulative impacts to archeological resources as well. Museum collections would benefit from the actions in the master plan.

Construction emissions would cause short-term, minor, adverse impacts to air quality. When the barracks are fully occupied, it is anticipated that there would be a six-fold increase in automobiles in the barracks, which would contribute to long-term, minor impacts to climate change. There would be long-term and beneficial effects to the visitor experience due to the greatly expanded opportunities, interpretation, accessibility, amenities, and increased access for visitors. Short-term, minor to moderate, adverse effects to the visitor experience would result from construction.

The selected action would increase the number of vehicles entering, parking, and leaving the barracks each day. Adverse visitor impacts resulting from parking changes would be minor to moderate in the short term and could result in moderate to major impacts in the long term, depending on the which parking utilization method estimate is used. There could be less parking available in the East Barracks and a surplus in the South Barracks. There also would be beneficial effects, and short- and long-term, adverse, minor to major, cumulative impacts to transportation, circulation, and parking. Major cumulative impacts to visitors would result when the selected action is combined with the CRC project. This is due to the direct taking of existing park lands and conversion into the right-of-way, the destruction of archeological sites within this new right-of-way, construction activities that may last over five years, the increased height of the new bridge, the increased visibility of moving vehicles on the bridge, the anticipated increase in traffic, and the loss of visibility of the west hills of Portland from the park, which has been an iconic view since the creation of the park. There is also the potential for cumulatively long-term, beneficial effects due to increased access, utility improvements, building rehabilitation, and other visitor improvements.

As buildings become rehabilitated and leased, the selected action would have short- and long-term, beneficial effects on the socioeconomic climate of the surrounding area due to increased spending, employment, and local population. There could be short- and long-term, adverse impacts to the real estate market of the metropolitan statistical area due to competition with other vacancies, but by the time the buildings are leased, this impact should be barely detectable. Competition between the barracks building uses and the building uses in Fort Vancouver is also expected to be negligible. Cumulative projects could improve visitation to the barracks and are expected to benefit the socioeconomic climate.

Impacts to human health and safety are expected to be minimal. Remediation of contaminated areas will occur prior to NPS construction. In general, safety hazards will be removed from the site, and there will be long-term, beneficial effects to health, safety, and the environment.

There would be short-term, minor and long-term, moderate, adverse impacts, in addition to beneficial impacts, to park operations. Efficiency would improve as the park would have

additional and improved space for their operations. It is anticipated that the leasing and management of buildings not occupied by the National Park Service would have some NPS oversight and coordination. Further, planning and implementation of the projects identified in the selected action will require staff time that will be taken from daily duties such as visitor contact, interpretation, resource protection, and safety, if additional positions are not funded; this could result in a moderate, adverse impact. Rehabilitation of all of the buildings in the project area would incorporate sustainable design development practices in order to conserve water and energy, and the utility system would be upgraded to benefit park operations. Water use could increase slightly from the existing condition, but overall water use is expected to be no greater than when the barracks were at full capacity by the U.S. Army. Water conservation measures will ensure that the selected action has negligible, adverse effects on water supply.

Degree of effect on public health or safety

The selected action would result in minimal adverse effects to public health or safety. The selected action would rectify current safety hazards on site and improve safety and public health in the barracks. Utilities upgrades would improve the reliability of the water lines for drinking water and fire suppression. Lead in the soils would be remediated. There would also be benefits to public health from expanded pedestrian walkways and trail networks.

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

Some members of the federally recognized Nisqually Tribe objected to any ground disturbance within or near the cemetery, reuse of 721 and 722 as art/community/event and office space, respectively, as well as public access to archeological excavations. Other commenters felt that the National Park Service should have completed an environmental impact statement instead of an environmental assessment.

However, Fort Vancouver National Historic Site remains confident in the environmental analysis and the determination that the impacts to park resources would not be significant. The park also determined that this opposition to certain components of the selected action does not indicate a high degree of controversy. The park is developing a plan of action under the Native American Graves Protection and Repatriation Act, and the tribe has agreed “to work together on and look forward to working collaboratively with the National Park Service and other consulting parties on the respectful stewardship of cultural resources within the barracks.”

Further, the National Park Service will ensure that agencies or entities that occupy buildings 721, 722, and 987 are fully aware of the fact that the buildings are within the boundaries of the HBC Cemetery. The NPS will ensure that activities within and around these buildings will be limited so they do not conflict with the reverent setting of a cemetery. This will be documented in the Cemetery Management Plan.

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

The potential impacts are well defined and analyzed in the environmental assessment and regulatory consultation was obtained where necessary. The degree or possibility that the effects on the human environment will be highly uncertain or will involve unique or unknown risks is remote. The chance of encountering unknown archeological resources is also unlikely, as the park expects to conduct archaeological surveys ahead of all proposed ground-disturbing activities and has mitigations in place to reduce impacts.

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 will not predetermine or establish a precedent for future actions with significant effects in the Vancouver Barracks. The environmental impact of all anticipated actions planned for the barracks have been evaluated in the environmental assessment and do not reach the level of significance.

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

The environmental assessment considered the cumulative impacts of the selected action with several past, present and ongoing future projects. The analysis for all impact topics indicated that the selected action could result in cumulative impacts. The majority of these cumulative impacts are minor to moderate in intensity. There is potential for moderate to major adverse cumulative effects to visitor resources and park operations from the CRC project. If the CRC project is implemented, park staff time would be required to partner and ensure resources are protected. It would impact the visitor experience by the direct taking of existing park lands, visual impacts, noise, traffic, and long periods of construction. Collectively, however, these cumulative adverse effects do not reach the level of significance.

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

The selected action will result in a range of impacts to structures, objects, and landscapes listed on the National Register of Historic Places. While there will be adverse impacts for the National Environmental Policy Act and the National Historic Preservation Act, there will be many beneficial effects from the master plan.

Seventeen of 20 historic structures will be retained and rehabilitated in accordance with *The Secretary of the Interior's Standards for Historic Structures*. The actual removal of historic structures qualifies as a long-term, moderate, adverse impact to the historic structures and cultural landscapes under National Environmental Policy Act and an adverse impact under Section 106 of the National Historic Preservation Act. Impacts from the rehabilitation to the historic buildings are expected to be negligible to minor because character-defining features of

the buildings will be preserved. Rehabilitation of the buildings would mostly benefit cultural landscapes.

Overall, the selected action will be beneficial and enhance cultural landscapes associated with both the Hudson's Bay Company and the U.S. Army. However, there are some activities that would adversely affect cultural landscapes. For instance, the removal of historic buildings 749 and 750 is an adverse effect to both the structures themselves, as well as a moderate adverse effect on the Vancouver Barracks cultural landscape. Although these structures are contributing elements to the VNHR National Historic District, they are of small stature (just over 200 square feet each), and they are in poor condition. Removal of these structures is also an adverse effect under the National Historic Preservation Act. The removal of building 422, however, is an adverse effect to the structure, but a benefit to the HBC cultural landscape. The remaining proposed activities, such as enhancing and preserving vegetation, will provide either negligible or beneficial effects to cultural landscapes.

Most of the ground disturbance, and thus impacts to archeological resources, would result from the infrastructure and utility upgrades. This work has the potential to adversely affect prehistoric, historic and archeological resources; some that have not been previously identified and as well as intact burials within the HBC Cemetery. To minimize excavations of intact burials, the upgrades will follow the previous utility corridors within the cemetery to the greatest extent possible. Elsewhere, mitigations will be implemented to ensure that important opportunities for archeological discovery are realized and that potentially buried archeological deposits are recognized in the course of active excavation and restoration. Even though resources will be disturbed, there will be little loss of integrity or important information potential, and the qualities of the archeological sites in the barracks will be retained. There will not be a substantial loss of data related to either the site's significance or other NHPA criteria associated with the archeological resource.

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

The National Park Service determined that there are no unique wildlife species, threatened or endangered wildlife species, or critical habitat within the project area. The only species of concern is the Oregon white oak (*Quercus garryana*), or Garry oaks, which are defined as a priority habitat by the Washington State Department of Natural Resources. These trees will be retained for their value as wildlife habitat and protected during any construction activities. The southern edge of the project area is approximately 905 feet from the north bank of the Columbia River and therefore will not affect salmonid species in the river.

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

Implementing the selected action would violate no federal, state, or local environmental protection laws. Assessment of the proposed action has been performed pursuant to the National Environmental Policy Act, which requires consideration of environmental protection laws and regulations.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The environmentally preferable alternative is the alternative that promotes the national environmental policy expressed in the National Environmental Policy Act, Section 101(b). This alternative would meet the following six goals: (1) fulfill the responsibilities of each generation as trustee of the environment for succeeding generations; (2) attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences; (3) 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; (4) achieve a balance between population and resource use that would permit high standards of living and a wide sharing of life's amenities; (5) enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources (NPS DO-12 Handbook, Section 2.7D); and (6) enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources (NPS DO-12 Handbook, Section 2.7D).

The environmentally preferable alternative is the alternative that causes the least damage to the biological and physical environment and the alternative that best protects, preserves, and enhances historic, cultural, and natural resources. After considering the environmental consequences of the alternatives, including consequences to the human environment, the National Park Service has concluded that the preferred alternative (alternative C) is also the environmentally preferable alternative.

To varying degrees, all alternatives would slow down the deterioration of historic barracks structures within the Fort Vancouver National Historic Site, thereby improving public health and safety as well as the appearance of aging historic structures. However, the preferred alternative includes the greatest extent of restoration of the Oregon white oak ecosystem, thereby improving and diversifying the aesthetic and cultural aspects of the site. Extensive cultural landscape restoration and educational activities would also interpret American Indian history and culture to the greatest extent under the preferred alternative (goal 2).

The actions outlined in all alternatives preserve important historic and cultural aspects of our national heritage by preserving and rehabilitating historic structures and restoring aspects of the cultural landscape. However, the no action alternative neither supports diversity nor inhibits it. It does not provide a variety of individual choices for the visitor or encourage a wide range of uses. Alternative B provides a diversity of visitor experiences; however, it does the least to preserve historic and cultural resources. For example, under alternative B, reconstruction of the historic HBC village would not extend into the South Barracks to the area west of building 405. While on the other hand, alternative D provides the greatest amount of cultural landscape restoration and interpretation of the site's resources, it also reduces the diversity of activities available on site by focusing on educational programming. For example, it limits the amount of commercial activity that may take place on site by focusing on educational uses. The preferred alternative, however, would allow the visitor to experience the site's resources through a variety of means and would actively encourage demonstration and interpretation of American Indian history and culture. The preferred alternative preserves important historic, cultural, and national aspects of our American

heritage regarding development of the Pacific Northwest (goal 3). The preferred alternative also supports diversity by encouraging office use by public agencies whose policies often require attention to equal employment opportunities (goal 4).

PUBLIC INVOLVEMENT AND AGENCY CONSULTATION

Internal Scoping and Partner Coordination

Discussion of ideas related to the relinquishment of the East and South Barracks from the U.S. Army to the National Park Service has been ongoing since August 2005. Starting in spring 2006, NPS and U.S. Army representatives met at least quarterly to discuss an orderly transition of the property from the U.S. Department of Defense to the Department of the Interior. In August 2009, NPS personnel (Fort Vancouver National Historic Site, Pacific West Regional Office, and DSC Planning Division) and representatives from the Fort Vancouver National Trust, City of Vancouver, and other agencies took part in a workshop to discuss initial ideas about the future of the site. Workshop participants toured the property and its buildings and discussed the potential suitability of buildings for different general purposes. Later, the master plan process was initiated and an interdisciplinary team was formed to provide guidance for the environmental assessment. In February 2010, the National Park Service hosted numerous internal planning meetings, which included the National Park Service, City of Vancouver, and Fort Vancouver National Trust, to obtain preliminary ideas on the scope of the plan, potential issues, and impact topics. During this internal scoping phase, the planning team also developed a draft vision statement and draft goals for the property and for the master plan.

Public Scoping

In March 2010, following identification of the vision, goals, and issues, and opportunities for the plan to address, the National Park Service initiated public scoping. During the public scoping phase, the National Park Service solicited public input on the draft vision and goals and gathered other input, including concerns related to the project and ideas for future reuse and management of the property. The National Park Service sent out scoping newsletters and postcards via direct mail and email to approximately 600 park visitors, regulatory agencies, park neighbors, and other interested parties. A press release was also issued and meetings were advertised through local media outlets and social media tools such as Twitter.

Two public meetings were conducted in April 2010. The NPS staff designed the meetings in an open house format to promote high levels of interaction between the public and planning team. Listening stations were set up at the meetings where background, issues, and visions and goals for this project could be discussed in depth. Maps, posters, and handouts presented this material in a visual format and helped guide discussion. Materials were made available online through the Planning, Environment, and Public Comment (PEPC) website. NPS staff also led two informative walking tours of the project area in order to familiarize attendees with the East and South Barracks. Attendees at public scoping meetings provided a number of valuable comments, which were recorded and incorporated into the planning process. Approximately 70 people attended the afternoon public meeting and 60 people attended the evening public meeting. Local

journalists also covered the meetings, resulting in several articles in Vancouver's local newspaper, *The Columbian*.

The public scoping period was from March 20 to May 1, 2010. A total of 60 individuals or representatives from various organizations submitted comments through the PEPC website and comment cards that were made available at the public meetings and at the visitor center. The National Park Service received comments from nine organizations, including the Vancouver Bridge Club, Vancouver Police, Lewis and Clark Young Marines, Southwest Washington Royal Scottish Country Dance Society, Fort Vancouver Pipe Band, Vancouver USA Scottish Dancers, Veterans of Foreign Wars Vancouver Post 7824, National Parks Conservation Association, and Metis Consulting, LLC. While representatives from public agencies were present at public scoping meetings, only the U.S. Environmental Protection Agency submitted written comments during the scoping phase of the planning process.

Comments obtained through the public scoping efforts were considered in an August 2010 internal IDT workshop, in which preliminary alternatives were generated. In addition to NPS personnel (Fort Vancouver National Historic Site, Pacific West Regional Office, and DSC Planning Division), representatives from Fort Vancouver National Trust, City of Vancouver, and U.S. Army took part in the workshop and contributed to the development of alternatives.

Public Review of the Environmental Assessment

The National Park Service released the environmental assessment for public review during a 48-day period from February 1 to March 19, 2012. To explain the range of alternatives, including the preferred alternative, and to solicit feedback on the proposed course of action, the National Park Service sent newsletters and postcards via direct mail and email to approximately 600 park visitors, regulatory agencies, park neighbors, and other interested parties. A press release was also issued, and meetings were advertised via local media outlets and social media tools such as Twitter. Recipients of paper copies of the *East and South Vancouver Barracks Draft Master Plan and Environmental Assessment* included the Department of Archeology and Historic Preservation, U.S. Army Corps of Engineers–Environmental Quality, U.S. Fish and Wildlife Service, U.S. Environmental Protection Agency–Region 10, Washington State Department of Ecology–Water Quality Program, Washington Department of Fish and Wildlife, U.S. Coast Guard–Sector Portland, Oregon, Washington State Department of Natural Resources, Washington State Department of Transportation, and Washington Department of Fish and Wildlife–Region 5. Libraries that also received paper copies of the environmental assessment included Vancouver Community Library, Vancouver Mall Community Library, Multnomah County Central Library, Oregon City Public Library, Portland Community College Rock Creek Campus Library, and Cascade Park Community Library. An electronic version of the environmental assessment was broadly available to the public through the PEPC website and the park's public website.

There were multiple articles and advertisements at the public review open houses and alternatives were published in *The Columbian* on February 7, 13, 18, and 23, 2012, as well as multiple social media messages were sent out on Twitter. Information on the alternatives and

public review open houses was also provided to attendees at the government-to-government tribal consultation meetings on February 20, 2012.

The National Park Service conducted open house public meetings on February 22-23, 2012 to gather the public's ideas and opinions on how well the plan addressed their issues and concerns, specifically the preferred alternative. Meetings were held on two separate days at different times to maximize public participation. In total, 50 people attended the afternoon public meeting and 23 people attended the evening public meeting. Similar to public scoping meetings, NPS staff designed the meetings to promote high levels of interaction between the public and planning team. Listening stations were set up at the meetings where the background, issues, and visions and goals for this project could be discussed in depth. Maps, posters, and handouts presented this material in a visual format to explain the alternatives and facilitate discussions. Materials were also made available online through the PEPC website. NPS staff also led walking tours of the project area to illustrate the look and feel of the East and South Vancouver Barracks if the preferred alternative were to be implemented.

Throughout the public comment period, 61 correspondences (23 comment cards, 26 PEPC comments, 7 organization or agency letters, 4 emails, and 1 Facebook post) were received regarding the *East and South Vancouver Barracks Draft Master Plan and Environmental Assessment*. There were 646 hits to the PEPC website via a Twitter link, which had been established for the EA review commenting period, with one of those being a re-tweet by *The Columbian*. Among those who responded were seven organizations including the City of Vancouver, Fort Vancouver National Trust, National Parks Conservation Association, Metis Consulting, LLC, the Nisqually Tribe, Vancouver Barracks Military ASN representatives, Portland State University Anthropology Department, and the Confluence Project. There were also nine form letters received from the Ke Kukui Foundation. Overall, the National Park Service received many valuable comments that have helped guide further refinement of the master plan.

An overwhelming majority of commenters expressed support for the planning process and the preferred alternative. Many felt that the master plan offers the best alternative for rehabilitating the East and South Barracks. There also were correspondences that identified some concerns. The National Park Service compiled and analyzed all comments received. Substantive comments were grouped into concern statements. Responses to these substantive comments are included in the errata. Some commenters requested clarification on certain issues, modifications, or additions to be made to the preferred alternative or environmental assessment. These questions are also documented and responded to in the errata, which is prepared as a technical attachment to the environmental assessment. The following is a summary of the comments received.

The majority of commenters expressed support for the mixed-use concept and historic preservation aspects of the preferred alternative. Some of the more specific themes include public support for the plan's flexibility, as well as the mixed-use of public and private, the proposed rehabilitation of the South Barracks, the proposed treatment of the HBC landscape, the adaptive reuse of historic structures, and all of the interpretive elements that would be incorporated on site. Many commenters also applauded the economic and environmental sustainability of the plan, suggesting that the preferred alternative was an attainable vision and that it would encourage the financial means to keep the historic facilities protected for years to

come. Comments also expressed support for educating the public about sustainable practices that would be used throughout the East and South Barracks project area. Some commenters also noted that they were thankful to be a part of the planning process and felt their voices had been heard throughout the planning process.

Other commenters expressed concerns or requested modifications about a variety of topics. The majority of concerns included a desire for equal distribution among historic interpretive themes and a balanced mix of uses, access and circulation, and economic sustainability. Some commenters expressed concern about the potential demolition of historic structures and the adequacy of consideration put toward partnerships, parking allotments, roadway design, and pedestrian and bicycle circulation. Other concerns related to the preferred alternative's focus on public agency offices, and the long-term financial viability of the preferred alternative. Respondents also stressed the need for accessibility to facilities, appropriate retail uses, events, activities, restaurants with price variability, and overnight accommodations for the public. Many commenters also underscored the importance of well-rounded interpretation of all aspects of the site history, including American Indian, HBC, Civilian Conservation Corps (CCC), and U.S. military history. Specific recommendations for building uses included museums, art galleries, music and dance performances, rental spaces, community meeting or conference rooms, and opportunities for active learning about historic and cultural resources. Other suggestions for on-site uses included a dog park, bakery and coffee shop, and multiuse trails that could be used for interpretive purposes.

Agency Consultation and Coordination

Washington State Department of Archaeology and Historic Preservation (Washington State DAHP). Section 106 of the National Historic Preservation Act requires federal agencies, or those they fund or permit, to consider the effects of their actions on the properties that may be eligible for listing or are listed in the National Register of Historic Places. The NPS conducted an agency scoping meeting with the Washington State DAHP. A representative from the Washington State DAHP attended the first internal scoping meeting for the project on February 8, 2010. The Washington State DAHP was also sent a copy of the administrative draft of the environmental assessment on August 1, 2011. The Washington State DAHP responded to the administrative draft with comments and recommendations for edits on October 19, 2011. Each of their six recommended edits were considered or incorporated into the final draft of the master plan and environmental assessment.

Because the National Park Service stated that certain proposed actions in the preferred alternative of the master plan would result in adverse effects to properties listed on the National Register of Historic Places, and in order to streamline future actions presented in the master plan requiring section 106 compliance, it was necessary for the National Park Service to prepare a programmatic agreement with the Washington State DAHP. The programmatic agreement stipulates the procedures for compliance of section 106 of the National Historic Preservation Act. The programmatic agreement, once fully executed, evidences park compliance with section 106 and will govern the undertaking (36 CFR 800.6). The programmatic agreement establishes the procedures for conducting further efforts to inventory archeological resources; requirements of American Indian consultation; procedures and consultation with the Washington State DAHP,

procedures for developing strategies to avoid and protect resources; procedures and proposed mitigation measures for the proposed demolition of historic structures 422, 749, and 750, as well as reporting and monitoring requirements. The National Park Service and Washington State DAHP signed the programmatic agreement on October 19, 2012 and it is attached to the FONSI.

Advisory Council on Historic Preservation (ACHP). In accordance with section 800.6 (a) (1) (i) (C) of the National Historic Preservation Act, an agency must notify the council and determine if the council wants to participate in the consultation when a programmatic agreement is prepared to address adverse effects to historic properties. The NPS consulted with the ACHP, informing them of the scope of the project, sending them a copy of the EA, and the draft Programmatic Agreement for Section 106 undertakings within the East and South Vancouver Barracks in June 2012. The ACHP replied with a letter on August 1, 2012, stating that they did not believe that their involvement as a signatory of the PA was necessary at this time. Per the request of the ACHP in this letter, however, a signed copy of the final PA will be shared with them for their files, and they reserve the right to become a consulting party at a later time, if circumstances change and their participation becomes warranted.

U.S. Fish and Wildlife Service / Washington Department of Fish and Wildlife. The Endangered Species Act of 1973 requires that each federal agency ensure that proposed agency actions do not jeopardize the continued existence of a listed species or result in destruction or adverse impact to designated critical habitat. Fort Vancouver National Historic Site received a habitat and species map from the Washington Department of Fish and Wildlife. The National Park Service then conducted a natural resource survey to determine the presence of any special status species that had potential to occur at the site. There are no threatened or endangered species in the area that would be affected by the project. The only species of concern is the Oregon white oak (*Quercus garryana*), or Garry oaks, which are defined as a priority habitat by the Washington State Department of Natural Resources (WA DNR). These trees will be retained for their value as wildlife habitat and protected during any construction activities. Because all Oregon white oak trees will be maintained in their current condition and there will be no impact to the grove, the National Park Service has made a determination of no effect to this species. The National Park Service notified both the Washington Department of Fish and Wildlife and the U.S Fish and Wildlife Service that there would be no effect on the Oregon white oak or any other special status species.

American Indian Consultation and Coordination

Consistent with the Native American Graves Protection and Repatriation Act (NAGPRA) (25 USC 3001) and the National Historic Preservation Act (36 CFR 800), the National Park Service regularly consults with 26 federally recognized tribes at Fort Vancouver National Historic Site. During planning, the National Park Service hosted several tribal consultation meetings regarding the future of the East and South Barracks. The first of these agency scoping meetings occurred on February 26, 2010. Representatives of the Confederated Tribes of the Grand Ronde Indians of Oregon, the Confederated Tribes of the Warm Springs, the Umatilla Tribe of Indians, the Spokane Tribe, the Cowlitz Tribe, the Yakama Tribe, the Nisqually Tribe, and local representatives of Native Hawaiian ancestry all attended this meeting. In May of 2010, NPS staff also attended a meeting with the Affiliated Tribes of Northwest Indians in Grand Ronde, Oregon

to discuss the plan and gather additional input from tribes. An additional scoping meeting occurred on April 25, 2011, with representatives of the Confederated Tribes of the Grand Ronde Indians of Oregon, the Confederated Tribes of the Warm Springs, the Umatilla Tribe of Indians, the Spokane Tribe, the Cowlitz Tribe, the Yakama Tribe, the Nisqually Tribe, and local representatives of Native Hawaiian ancestry in attendance. These consulting tribes were also sent a copy of the administrative draft of the environmental assessment to provide input during summer 2011.

On February 21, 2012, the National Park Service also hosted a tribal EA review meeting as part of the planning process for the *East and South Vancouver Barracks Draft Master Plan and Environmental Assessment*. This meeting was coordinated with 26 federally recognized Native American Tribes, as well as the Washington State DAHP. Representatives of eight of the federally recognized tribes were present, including the Confederated Tribes of the Grand Ronde Indians of Oregon, the Umatilla Tribe of Indians, the Spokane Tribe, the Cowlitz Tribe, the Yakama Tribe, the Nisqually Tribe, the Cow Creek Band of Umpqua Tribe of Indians, and the Ke Kukui Foundation. The three topics discussed included the *East and South Vancouver Barracks Draft Master Plan and Environmental Assessment*, the programmatic agreement, and the infrastructure upgrade project. Each topic was introduced through a presentation or discussion by the park staff, followed by open discussion for clarifications, questions, or concerns. All comments the National Park Service received from the 25 federally recognized tribes are included in the errata and responded to accordingly. Federally recognized tribes were also sent a copy of the administrative draft of the *East and South Vancouver Barracks Draft Master Plan and Environmental Assessment* in advance of the commenting period to provide input.

The proposed replacement of underground utilities throughout the East and South Vancouver Barracks will result in the intentional excavation of trenches within the cartographically determined boundaries of the HBC Cemetery. Per the requirements of Native American Graves Protection and Repatriation Act, the National Park Service is developing a plan of action for these intentional excavations, acknowledging the possibility of the discovery of human remains or associated funerary objects during these excavations. A NAGPRA plan of action meeting was held at the park on May 2, 2012. Representatives of nine federally recognized tribes attended the meeting, including: the Confederated Tribes of the Grand Ronde Indians of Oregon, the Umatilla Tribe of Indians, the Spokane Tribe, the Cowlitz Tribe, the Yakama Tribe, the Nisqually Tribe, the Cow Creek Band of Umpqua Tribe of Indians, the Nez Perce Tribe, and the Ke Kukui Foundation. As part of this meeting, it was suggested that a NAGPRA consortium of interested tribes be created specific for the terms of the NAGPRA plan of action and for any impending discoveries of human remains. A NAGPRA plan of action is currently being drafted and will be shared with all of the 25 federally recognized tribes for comments and edits. No excavations within the cartographically determined boundaries of the HBC Cemetery will occur until the NAGPRA plan of action is finalized and signed by all NAGPRA consortium parties who wish to act as a signatory.

Consultation meetings and communications will continue to be held as specific undertakings related to the rehabilitation of the East and South Vancouver Barracks occur. Tribal comments and concerns will always be addressed as professionally and diligently as possible. In addition,

all federally recognized tribes will be invited to sign the programmatic agreement as consulting parties.

CONCLUSION

Implementation of the selected action for the East and South Vancouver Barracks will not have significant impacts on the human environment. The determination is sustained by the analysis in the environmental assessment, agency consultations, the inclusion of public review, and the capability of mitigations to reduce or avoid impacts. Short-term, adverse environmental impacts are anticipated to be no greater than moderate. There would be long-term, major impacts to parking availability. There would be beneficial effects to the cultural landscape, socioeconomic climate, park operations, and visitor experience. There are no highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence. There are no previous, planned, or implemented actions, which in combination with the selected action would have significant effects on the human environment. Requirements of the National Environmental Policy Act have been satisfied and preparation of an environmental impact statement is not required.

Recommended:

Tracy Fortmann 12/5/12

Tracy Fortmann, Superintendent, Fort Vancouver National Historic Site Date

Approved:

Chris Lehnertz 12/20/12

Chris Lehnertz, Regional Director, Pacific West Region, National Park Service Date

APPENDIX A

DETERMINATION OF NON-IMPAIRMENT
EAST AND SOUTH BARRACKS MASTER PLAN
FORT VANCOUVER NATIONAL HISTORIC SITE

The park manager's determination of no impairment is based upon the resource impact analysis in the environmental assessment. The description of park significance in chapter 1 of the master plan was used as a basis for determining if a resource 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
- identified in the park's general management plan or other relevant NPS planning documents as being of significance

The prohibited impairment is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values (NPS *Management Policies 2006*). Whether an impact meets this definition depends on the particular resources that would 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. As interpreted though enabling legislation, the purpose of Fort Vancouver National Historic Site is to preserve and interpret the following:

- the site of the 19th century Hudson's Bay Company activities
- settlement of the Oregon Country (became Oregon Territory in 1848)
- the establishment of the U.S. Army Vancouver Barracks

During the development of the 2003 general management plan, the significance of the national historic site was determined to be the following:

- From 1825 through 1849 Fort Vancouver was the site of the Hudson's Bay Company's administrative headquarters and supply depot west of the Rocky Mountains. As a result, the Hudson's Bay Company greatly influenced the economic, political, and cultural development of the Pacific Northwest.
- Fort Vancouver was the Pacific Northwest center for fur trade and other commerce, agriculture, and industry between 1825 and 1849.
- Fort Vancouver was the first terminus of the Oregon Trail (water route along the Columbia River).
- Vancouver Barracks, established in 1849, was the first military post developed in the Pacific Northwest. It served as headquarters for U.S. Army operations into the 20th century.

- Fort Vancouver National Historic Site contains extensive archaeological resources, both in situ (in original location) and recovered, that provide important information about the physical relationships and the cultural and economic operation of the Hudson's Bay Company and the U.S. Army.

The East and South Barracks Master Plan and Environmental Assessment analyzed the following topics: Historical Structures; Cultural Landscapes; Archeology; Museum Collections; Air Quality and Global Climate Change; Visitor Experience; Traffic, Circulation and Parking; Park Operations; Socioeconomic Factors and Land Use; and Health and Safety. Impairment determinations are not necessary for visitor experience, socioeconomics, land use, public health and safety, and park operations, because impairment findings relate back to park resources and values. These impact areas are not generally considered to be park resources or values according to the Organic Act, and cannot be impaired the same way that an action can impair park resources and values.

CULTURAL RESOURCE TOPICS

Historic Structures

The structures within the East and South Barracks contribute to the significance of Fort Vancouver National Historic Site, are necessary to fulfill the purposes for which the park was established, and key to the cultural integrity of the park. The selected action will retain a large number of historic structures, 17 of 20 buildings. These buildings will be preserved and rehabilitated according to *The Secretary of the Interior's Standards for the Treatment of Historic Properties*. Guidelines for compatible new construction would be prepared to ensure compatibility of new building construction and the introduction of other new elements into the historic setting and would be subject to review and approval by National Park Service.

Three buildings would be removed. Building 422, a ca. 1935 Quartermaster's Issue and Receiving Warehouse, is a contributing structure to the VNHR National Historic District. The removal of this structure would be a moderate impact to the VNHR National Historic District (adverse effect for section 106). The removal of the structure would assist in restoring the viewshed of the reconstructed HBC Fort Vancouver from East Fifth Street, while also enabling the National Park Service to restore more of the HBC orchard and gardens in this area. The removal of this structure would necessitate the execution of a memorandum of agreement between the National Park Service and the State Historic Preservation Officer.

Buildings 749 and 750 would also be removed; both of which are small storage structures constructed in 1941 and contribute to the Vancouver Barracks cultural landscape and the VNHR National Historic District. The removal of both of these structures would be a moderate adverse impact to both the Vancouver Barracks cultural landscape and the VNHR National Historic District (adverse effect for section 106). Although these structures are contributing elements to the VNHR National Historic District, the structures are of small stature (just over 200 ft^2 each)

and are in poor condition. The planning process did not identify a likely function for them and rehabilitating them may not be worth the costs or effort required for keeping them. The removal of these structures would also necessitate the execution of a memorandum of agreement between the National Park Service and the State Historic Preservation Officer.

Removal would result in a moderate, adverse impact to the historic structures themselves, but they are all in poor condition and two are of small stature (just over 200 ft^2 each). Because the rehabilitation would not have adverse effects and because the other 17 historic buildings would be rehabilitated and preserved, the selected alternative would not result in an impairment to historic structures.

Cultural Landscapes

The cultural landscapes within Fort Vancouver National Historic Site are closely tied to the purpose and significance of the park and the purposes for which the park was established, and they are key to the cultural integrity of the park. The East and South Barracks are within the U.S. Army Vancouver Barracks / Parade Ground cultural landscape and the HBC Fort Vancouver and HBC Village cultural landscape are bounded on the west by the South Barracks.

Under the selected alternative, the overall landscape of the East and South Barracks would be rehabilitated for adaptive reuse to support new and expanded uses, while preserving contributing landscape resources. The National Park Service would continue its efforts to restore the HBC garden and orchard as well as the ca. 1880s maple, oak, and buckhorn tree allée of the former McLoughlin Road in the area that currently bounds the HBC Village and South Barracks area. These efforts would be partially achieved with the removal of building 422 and the existing cyclone fence around the present NPS-U.S. Army boundary in the South Barracks. Without these army features in the way, it would be possible to expand the HBC garden and orchard into the South Barracks area, at least up to the proposed public parking lot proposed for the area. In addition, a trail replicating the pathway of the historic McLoughlin Road would be constructed within the tree allée, and there would be partial restoration of the HBC Village north-south road alignment through the South Barracks area by the removal of most of the pavement and sedimentary fill in the area between buildings 404 and 405. The implementation of these efforts would provide benefits to both the HBC and the Vancouver Barracks cultural landscapes (no adverse effect).

One proposed activity—the demolition of contributing structure building 422—would adversely affect the VNHR National Historic District (and result in an adverse effect according to section 106), but would benefit the HBC cultural landscape. Overall, the selected alternative would have beneficial effects on cultural landscapes of the East and South Barracks and therefore would not result in an impairment to those resources.

Archaeological Resources

The archaeological resources within the East and South Barracks contribute to the significance of Fort Vancouver National Historic Site, are necessary to fulfill the purposes for which the park was established, and are key to the cultural integrity of the park. They are generally not far beneath the ground surface and archaeological deposits exist throughout the project area. With the exception of the HBC Cemetery, there have been limited archaeological surveys in the project area. Much of the fill within the East and South Barracks area has been previously disturbed by fort development over the past 150+ years. Because of this prior disturbance, the archaeological resources have more diminished integrity than those that have not been disturbed.

Most of the anticipated ground disturbance would be from the result of all infrastructure and utilities upgrades and replacement, which would require excavation of over 5,500 ft of trenches throughout the project area. Other ground disturbance could result from the rerouting of roads, removing some pavement around structures, removal/construction of parking lots, and the demolition of buildings. These potential impacts occur through the loss of cultural context of artifacts, features, and so forth.

Such ground disturbance has the potential to adversely affect prehistoric and historic archaeological resources within the barracks, and particularly within the HBC Cemetery boundaries, with the potential to disturb human remains. However, the discovery of human remains in and of itself would not necessarily result in major impacts to these features; major impacts would result if excavation or disturbance continues after the discovery. The project would implement a number of mitigations that would reduce this impact, such as ensuring an archaeological and Native American monitor is present during all ground disturbances. If human remains or other significant archaeological resources are discovered during excavation, work would stop and the find would be secured and protected in place. A qualified physical anthropologist and park archaeologist would both be immediately notified to verify if the remains are human. If the contexts of the find indicates that they are not from a European American, they would be treated in accordance with the NAGPRA regulations at 43 CFR 10.4 (Inadvertent Discoveries).

Archaeological testing and evaluation would be conducted as needed to determine the significance of archaeological resources that could be impacted by any component of the selected alternative. Wherever possible, reconstruction, trail and road development, and other projects would seek to avoid archaeological resources that are intact and contribute to the significance of the VNHR Historic District. If it is not possible to avoid significant archaeological deposits for a proposed undertaking, a data recovery or other mitigation plan would be developed and implemented through a memorandum of agreement with the State Historic Preservation Officer and other consulting parties as appropriate. Artifacts collected during survey, testing, and evaluation work would be cataloged to the Secretary of the Interior’s standards and curated at the Fort Vancouver National Historic Site curation facility. A cultural

resource monitoring plan would be prepared to ensure that ground-disturbing activities would be minimized.

With mitigation, the adverse impacts to archaeological impacts are expected to be minor. There would be little loss of integrity of the resource and there would not be a substantial loss of data related to the site's significance or other NHPA criteria. Actions in the selected alternative would not preclude the continued preservation of the archaeological resources for their continued enjoyment by future generations. For purposes of section 106, the determination of effect would be no adverse effect and because of the lack of impacts to these resources, there would be no impairment to archaeological resources.

Museum Collections

The museum collections contribute to the significance of Fort Vancouver National Historic Site, are necessary to fulfill the purposes for which the park was established, and are key to the cultural integrity of the park. Currently, Fort Vancouver curates more than two million objects. The collection is curated in the Fur Store, which is undersized. Under the selected alternative, a building would be renovated to create a new museum facility and provide a venue for interpretation of these resources. This facility would be designed to handle not only the existing Fort Vancouver collection, but would also include space for collections from other national park units with whom Fort Vancouver NHS has a curation agreement. While the collection will grow from additional discoveries from this project as well as those identified in the cumulative impact scenario, such as the CRC project, there would be sufficient space to properly curate these items. When the renovation of the facility is completed, the National Park Service would carefully move the collection according to general NPS preservation and security protocols. The impact would be negligible and at the lowest level of detection or barely measurable, with no perceptible consequences, neither adverse nor beneficial, to archaeological resources. For purposes of section 106, the determination of effect would be no adverse effect and because of the lack of impacts to these resources, there would be no impairment to any artifacts or resources contained with the museum collection.

NATURAL RESOURCE TOPICS

The significance of Fort Vancouver National Historic Site is focused on the history and its corresponding cultural resources. Natural resources are not identified in the establishing legislation nor are they are necessary to fulfill the purposes for which the park was established. Except for the Oregon white oaks, or Garry oaks, natural resources are not noted as being significant for the park, nor do many exist within the project area or the Vancouver National Historic Reserve as a whole. Impacts to soils are anticipated to be short-term, localized, and minor and were therefore not analyzed. There are no unique wildlife species, threatened or endangered wildlife species, critical habitat, wetlands, or floodplains within the project area; no impacts or impairment are expected to these resources.

Vegetation

This topic is addressed under “Cultural Resources” in the environmental assessment. The project area is an urban landscape that consists of landscaped areas with native and nonnative conifers and deciduous trees, including Oregon white oak, and ornamental shrubs typical of those found throughout the Fort Vancouver National Historic Site. The stand of Oregon white oak (*Quercus garryana*), or Garry oaks, are defined as a priority habitat by the Washington State Department of Natural Resources.The department’s guidelines for the management of this priority habitat will be followed for this species. Furthermore, the selected alternative proposes to restore these trees where feasible. No other listed priority habitats or species of concern were located during field surveys. Because there would be only negligible, adverse impacts to vegetation, there would be no impairment to this resource.

Air Quality and Global Climate Change

There would be short-term, moderate impacts to air quality as a result of construction activities. These effects are expected to contribute minimally to global climate change. Dust generation would be mitigated through limiting the disturbed areas and use of water for dust suppression. None of the proposed building uses would result in objectionable odors.

Under the selected alternative, it is anticipated that full development of the proposed uses of the East and South Barracks would result in six-fold increase in the average number of vehicles entering and parking in the East and South Barracks on a Monday–Friday basis. This is a large increase in operational automobile traffic from the existing condition, but this exiting condition is substantially lower than when the barracks were fully occupied by U.S. Army personnel. It is expected that by 2030, long-term emissions of all air pollutants would be substantially lower than present due to expected improvements in vehicle emissions. Further, the anticipated total of future vehicles it is still under 2,000 vehicle trips into the area, which is expected to result in moderate, adverse, long-term impacts to local air quality. Because intensity of impact is low, no impairment to air quality would occur, and the project would have only moderate, adverse contributions to global climate change.

SUMMARY

As described above, adverse impacts anticipated as a result of implementing the selected alternative on 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 as significant in the park’s general management plan or other relevant NPS planning documents, would not rise to levels that would constitute impairment.

ERRATA
EAST AND SOUTH VANCOUVER BARRACKS MASTER PLAN ENVIRONMENTAL ASSESSMENT

DECEMBER 2012

The *East and South Vancouver Barracks Draft Master Plan and Environmental Assessment* (December 2011) was released for public review from February 1, 2012 to March 19, 2012. A total of 61 correspondences resulting in 460 comments were received during the public review period. The errata records changes to the text of the *East and South Vancouver Barracks Draft Master Plan and Environmental Assessment* as a result of comments received since the document was released on February 1, 2012. These edits correct, clarify, or modify original text based on public comments and correct other inaccuracies in the environmental assessment (EA). The corrections in this errata sheet do not change the project activities or increase the degree of impact described in the environmental assessment. The environmental assessment, errata, and finding of no significant impact (including the mitigation table) comprise the full and complete record of the environmental impact analysis.

EDITS AND CORRECTIONS TO THE ENVIRONMENTAL ASSESSMENT

Changes to the text and justification for the change are provided as follows. Existing text is in *italics*, additions to the text are underlined, and deleted text is shown as a ~~strikeout~~.

Page viii, Executive Summary, Alternative C, add after first sentence:

"For example, in agreement with the park's long-range interpretive plan, interpretive exhibits, waysides, and cultural landscape rehabilitation would depict the site's relationship with military history, the Hudson's Bay Company, the many American Indian affiliated tribes, and other important connections that help tell the story of the park's purpose and significance."

Page viii, Executive Summary, Alternative C, add after first paragraph:

The promotion of alternative transportation is a critical part of the goals that guided the development of this plan. Future design and implementation of the preferred alternative will explore more specific ways of supporting options for pedestrians, bikes, and transit.

Page 32–33, Adaptive Reuse Categories:
~~By assigning potential uses to particular buildings, the National Park Service is not officially zoning buildings for particular uses.~~ *Potential land uses identified under each alternative, including the preferred, are advisory and should not be construed as limitations on the specific uses that each building may accommodate. Rather than limiting reuse to uses identified in this Environmental Assessment and to allow for some flexibility, NPS staff will* ~~*entertain*~~ consider *a variety of requests for the responses and sensitive reuse of these treasured historic resources*. If a use, which differs from the use identified in the master plan conceptual site plan, for the barracks is considered, the National Park Service will carefully analyze the new use, ensure that it is consistent with the focus of the master plan, and assess the environmental impacts of the

proposal. However, under all circumstances, the primary focus of the selected alternative, as a dynamic, sustainable, public service campus, would remain intact. Any changes to building uses, circulation, or parking that substantially differ from the master plan, or that could result in a greater level of environmental impact than were analyzed in the environmental assessment, would then require additional environmental and/or cultural compliance.

Additionally, as economic conditions and market trends may change over the years, the National Park Service may need to consider a variety of requests for the reuse of the historic structures.

Page 55, Alternative C (Preferred Alternative) map:
Map to be replaced with updated map attached on the following page. Changes include depicting buildings proposed for removal (422, 410, 710, 749, 750, and 787) and revising the shading for buildings 991 and 993 to show both office space and space for interpretation and visitor services. In addition, building 752 should be portrayed as NPS storage, not as office space.

Page 87, Table 9, Impact by Alternative:
Cultural Landscape and Vegetation, Parking, Roads, and Sidewalk Modifications
Alternative B – ~~negligible to~~ minor to moderate.

Museum Collections
Alternative A – ~~negligible to minor~~ moderate
Alternative B – ~~same as alternative B~~ beneficial to negligible

Page 89-90, Mitigative Measures, Cultural Resources
Replace CR-4: Previously Undiscovered Resources with the below mitigations:

CR-4a: Previously Undiscovered Cultural Resources, Inadvertent Discoveries: If buried cultural resources are inadvertently discovered during ground-disturbing activities, work shall stop in that area and within a 100-foot radius of the find until a qualified archaeologist can assess the significance of the find. Alternatively, an archaeologist and possibly an American Indian representative may monitor ground disturbances in the vicinity of the site to ensure that such discoveries are protected until they can be properly recorded and assessed and management decisions can be made about their treatment. Avoidance in place or no adverse effect from project actions is the preferred approach to all discoveries that are potentially eligible for listing on the national register. Inadvertent discoveries would be treated in accordance with 36 CFR 800.13 Protection of Historic Properties: Post-review Discoveries. The archeological resource would be assessed for its integrity and whether it contributes to eligibility for listing on the National Register in consultation with the Washington State Department of Archaeology & Historic Preservation (DAHP) and other consulting parties, and a determination of the project effects on the property would be made. If the site would be adversely affected, a treatment plan would also be prepared as needed during the assessment of the site's significance. Assessment of inadvertent discoveries may require archeological excavations or archival research to determine resource significance. Treatment plans would fully evaluate avoidance, project redesign, and data recovery alternatives before outlining actions proposed to resolve adverse effects.

CR-4b: Previously Undiscovered Cultural Resources, Discovery of Human Remains: If human skeletal remains are encountered, all work shall stop in the vicinity of the discovery, and the find would be secured and protected in place. The Clark County coroner and park archaeologist would both be immediately notified. If a determination finds that the remains are American Indian or Native Hawaiian and that no further coroner investigation of the cause of death is required, the remains would be treated in accordance with the Native American Graves Protection and Repatriation Act (NAGPRA) regulations (43 CFR 10.4 Inadvertent Discoveries). If the remains are historical, but not American Indian or Native Hawaiian, then disposition of the remains will be determined through further analysis and consultation with DAHP, other consulting parties, and lineal descendants, if known.

Page 91, CR-8: Visual Character
~~To minimize visual intrusiveness of construction fencing, it will be designed and installed to blend into the surroundings as much as possible.~~ *All construction, staging, and stockpile access will be gated and kept locked except when in use.*

Page 92, AQ-3: Construction Dust
As appropriate, measures will be implemented ~~T~~to *reduce dust and fine particles from becoming airborne during construction activities,* such as: covering *truck beds* ~~would be covered~~ *with tarps or have at least two feet of freeboard*~~;~~ ~~S~~ cover and/or water *soil stockpiles* ~~will be covered or watered daily.~~; and sweeping ~~All~~ *paved access roads, parking areas, and public streets* ~~*would be swept, as appropriate,*~~ *when soil material is visible*.

Page 93, VE-4: Construction Exclusion Areas—Visitor Restrictions
During construction, the National Park Service would ensure that all active construction, staging, and stockpile areas are fenced to render them inaccessible to the public. ~~To minimize visual intrusiveness of fencing, it would be designed and installed to blend into the surrounds as much as possible.~~ *All construction, staging, and stockpile access would be gated and kept locked except when in use. Signs would be conspicuously posted to inform the public about the need for caution and to safely route visitors around construction areas. Established and maintained walkways would be provided across the site, as well as barrier fencing along trails and paths.*

Page 138, Impacts of Alternative B:
Buildings 749 and 750, two contributing ca. 1941 storage sheds, could be removed. This would result in a long-term adverse ~~*major*~~ moderate *impact to the historic structures (adverse effect for Sec. 106).*

Page 140, 141, and 142. Alternative B, Conclusion, Alternative C, Conclusion, Alternative D, Conclusion:
For purposes of Section 106 of the NHPA, rehabilitation of the historic buildings ~~*there*~~ *would* not result in ~~*be no*~~ *adverse effect on structures listed in or eligible for the NRHP (no adverse effect for Sec. 106).* Removal of buildings would result in an adverse effect (adverse effect for section 106).

Page 148 and 151, Alternative B, Conclusion and Alternative C, Conclusion:
For purposes of Section 106 of the NHPA, the proposed removal of buildings 749 and 750, as well as the reorientation of Alvord Road, *would be an adverse effect to the Vancouver Barracks cultural landscape.*

Page 157, No Action, Ground Disturbance, last sentence:
…would reduce adverse impacts to archeological resources within the East and South Barracks from ~~major~~ minor to moderate *in intensity (no adverse effect for Sec 106).*

Page 158 and 161, Alternative A, Conclusions, first sentence and Alternative C, Conclusions, first sentence:
~~Under this alternative, no activities would occur that would adversely impact archeological resources.~~

Page 195, Alternative B, Socioeconomic Factors and Land Use, third paragraph:
~~In alternative B, the desired mix of uses appropriate to the site include: 36.1% office, 17.3% residential (this could include apartments), 26.1 % retail, 7.9 % restaurants, and 11.9 % public benefit/use.~~

In alternative B, over half of the building space would be used for offices, less than 10% for residential, almost one-third for retail, and a little over 10% for public benefit.

Page 196 in EA, Alternative C, second paragraph:
The primary land use (over half) *would be office with approximately 68,342 square feet*. ~~In alternative C, the desired mix of uses appropriate to the site include: 40.7% office, 0% residential, 13.3% retail, 2.7 % restaurant, and 13.2 % public benefit/use.~~ There would be no residential use. A little less than a third would be set aside for public benefit uses, and the remainder would be for retail and restaurants.

Page 50, Alternative C, Adaptive Reuse, For Use by National Park Service and Partners, insert at end of section
Building 987 could be used as office space for the U.S. Forest Service or other partners. Whatever agency or entity occupies the building, the National Park Service will ensure that they are fully aware of the fact that the building is within the cartographically identified boundaries of the HBC Cemetery. As such, activities within and around the building should be limited to office and office support functions. Events that may conflict with the reverent setting of a cemetery should not be scheduled within the structure or within its immediate environs.

Page 50, Alternative C, Adaptive Reuse, For Use by Other Tenants, insert at end of section:
Building 721 could be used as arts and events space, while building 722 could be used as office space for future tenants. Both of these structures are within the cartographically identified boundaries of the HBC Cemetery. Similar to building 987, activities within these structures should be limited in scope to events that do not conflict with the reverent setting of a cemetery. This may limit the kind of events that could be held within and around building 721, as celebratory events such as weddings and parties may not be appropriate within this environment.

EA COMMENTS AND RESPONSES

This section summarizes the substantive comments that were received during the public review period of the environmental assessment. It does not include the entire correspondence text from any individual letter, but captures the primary concerns expressed by commenters. All correspondence received by the park is contained in the project administrative record. Concern statements and responses are as follow.

Comment: One commenter suggested that the National Park Service consider in the preferred alternative the extension of Hatheway Road, rather than McClellan Road, through the East Barracks to connect with the existing Park Road for better site access.

> **Response:** The environmental assessment considers access and circulation to and within the project area. Each alternative explores different options with regard to road connections, the location and general size of parking areas, and other features of circulation. The "Transportation, Access, and Circulation" concept for the preferred alternative represents broad site planning proposals arrived at during the planning process. However, this concept is intended to be somewhat flexible and could change based on safety concerns, resources, or other more detailed site design issues. The National Park Service is pursuing contracting for additional transportation planning and site design. This planning will be based on the adaptive reuse categories identified in the EA (office, retail, visitor services, community maintenance, lodging, etc.) and will address safety related issues. Implementation will be phased based on actual need.
>
> The plan recognizes the need for the Park Road to connect to the East Barracks; there are three alternatives for this connection. The preferred alternative recognizes McClellan Road as the preferred extension route, pending further study. In addition, on page 55, the master plan states, "[t]his map represents initial concepts for improving circulation that were considered during the planning process. More detailed study and design will be undertaken before any proposal is implemented." The future transportation site planning may indicate that Hatheway Road or the unnamed road to the south of Hatheway Road may be a better route for such extension.

Comment: Commenters, including the Nisqually Tribe, expressed concern regarding the proposed demolition of historic buildings. Commenters expressed opposing viewpoints on this issue. Some suggested that the National Park Service should remove buildings standing on the grounds of the HBC Cemetery (e.g., buildings 721, 722, 987) or elsewhere in the project area. Others objected to any removal of historic structures in the project area.

> **Response:** The National Park Service carefully considered the subject of building removal. The environmental assessment identifies six structures as potential candidates for removal. Three are modern structures that intrude upon the historic setting of the district. The other three structures—two of which are small sheds—are contributing resources of the Vancouver National Historic Reserve Historic District, which is listed on the National Register of Historic Places. These three are identified as candidates for removal because they are in poor condition and/or because their presence conflicts with the park's long-standing efforts to restore the cultural landscape from the earlier, Hudson's Bay Company (HBC) period south

of East Fifth Street. Final decisions regarding building removal will be made on a case-by-case basis in consultation with the Washington State Department of Archaeology and Historic Preservation (WA DAHP).

The planning team carefully considered the range of opinions expressed about the HBC Cemetery, including the suggestion to remove buildings 987, 721, and 722 and their associated infrastructure that stand on the cemetery grounds. The National Park Service recognizes that the HBC Cemetery is of high significance to the historic district, and is the resting place of people from many nations, including American Indian tribes and Native Hawaiians; the cemetery requires a respectful and thoughtful approach to management. These three buildings also help to establish the historic character of the entire historic district and their removal would be an adverse effect to the historic district, as well as negatively affect the interpretation and visitor experience of the park. For these reasons, the National Park Service made the decision not to remove the historic buildings on the HBC Cemetery. In lieu of complete building removal, the National Park Service decided to remove the gravel parking areas that lie directly on top of the HBC Cemetery and to look for other ways of returning the site to a more natural, reverent setting. The National Park Service will determine how the cemetery will be managed and interpreted through close consultation with appropriate tribes, Native Hawaiians groups, and park partners.

Comment: Commenters, including the Nisqually Tribe, expressed concern that there was inadequate interpretation of all aspects of history significant to the site in the preferred alternative.

Response: The Vancouver Barracks, and the rest of Fort Vancouver National Historic Site, have a rich and multilayered history. The National Park Service is committed to interpreting all aspects of history significant to the project area. Within the East and South Barracks, interpretation would be provided consistent with the site's long-range interpretive plan (2004) and other guidance on interpretation. Interpretation would focus on established interpretive themes, such as the HBC period, the settlement of the Oregon Country, the establishment of the U.S. Army Vancouver Barracks, and American Indian history and culture. The master plan lays out strategies for cultural landscape management that are aimed at revealing and commemorating this multilayered history. For example, it proposes restoring and interpreting cultural landscape features from the HBC period in portions of the project area. The master plan also describes general strategies for interpretation within the East and South Barracks including self-guided tours, wayside exhibits, publications, digital media, and displays within building foyers, which would complement the more intensive, person-to-person interpretation occurring elsewhere within the park. More detailed information about strategies, messages, and methods would be included in future planning documents.

Comment: A few commenters expressed concerns regarding the transportation concept in the master plan and suggested that access for pedestrians and cyclists should be prioritized over access for motorized vehicles. One commenter suggested that the National Park Service should consider a tram system to the project area.

Response: The transportation components of the preferred alternative are subject to change based on subsequent study and site design. Enhanced access to the project area for pedestrians and cyclists is an important consideration of the plan. Early in planning, the team developed a set of goals to help guide development of the master plan and subsequent site design. These goals, which are essentially priorities for the project, are included on pages 20–22 of the environmental assessment. One of these goals specifically addresses the subject of transportation, access, and circulation. In part, this goal states, "[m]anagement should promote universal access and alternative means of transportation to the barracks, including pedestrian, bike, and public transit." Although a tram is not specially identified in the environmental assessment, options for other types of shuttle and public transit remain options for the future. The selected alternative proposes connections to existing and proposed trail networks in the Vancouver National Historic Reserve and the City of Vancouver and strives to create a welcoming, safe environment for pedestrians and cyclists within the project area. For example, the preferred alternative proposes an interpretive trail that would form a loop with the Discovery Trail, which is an existing popular multiuse trail linking the park with the greenway along the Columbia River. The preferred alternative also proposes repairing, extending, and linking together existing sidewalks within the barracks. Furthermore, the National Park Service may selectively remove extraneous road segments and parking areas throughout the site, pending additional study.

Comment: One commenter expressed that more consideration is needed regarding universal access to facilities.

Response: Accessibility-related proposals are currently at a general and conceptual stage and as such, the current master plan does not go into detail on accessibility features. However, universal accessibility is addressed as an integral component of the selected and other alternatives. Site improvements and building rehabilitation would strive to accommodate all people and abilities without the need for individual adaptation. Once building occupancy is secured, the National Park Service would ensure that requirements for public health, safety, and accessibility are incorporated into subsequent design. For example, improvements such as accessible parking, loading zones, fire access, elevators, ramps, and other modifications would be made in accordance with the Architectural Barriers Act Accessibility Standards and the Accessibility Guidelines for Outdoor Developed Areas of 2009. Universal access will be promoted in conjunction with alternative means of transportation to the barracks, including pedestrian, bike, and public transit. All types of disabilities will be addressed within the site including mobility, visual, and hearing impairments.

Comment: A few commenters expressed concern that there may not be enough parking under the preferred alternative.

Response: Currently, there are 835 existing parking spaces located in the East and South Barracks. In order to estimate how much parking would be required in the future, the National Park Service compared the proposed land uses for each building to parking requirements under the City of Vancouver Municipal Code as well as the Institute of Engineers Land Use Code. Parking utilization surveys were also conducted in 2010–2011 at major use sites to determine future quantities for parking. These numbers were then used in a

more in-depth study to predict general needs for parking, along with broad assumptions about how existing buildings may be adaptively reused.

Following this environmental assessment, a separate site circulation study will further define parking needs based on generic building uses tied to the plan. Implementation will be phased based on actual need. In addition, as funding and building occupancy becomes secured over time, understanding of specific access and parking needs will become clearer, allowing the National Park Service to develop these recommendations in further detail. Site design will aim to provide the appropriate level of parking, while minimizing harmful effects on natural, cultural, and scenic resources. To the extent possible, the National Park Service may limit the expansion of new surface lots in order to minimize damage to resources, yet new lots may be added with final locations determined by specific building needs and occupation levels. NPS staff would also pursue collaborative parking solutions with the City of Vancouver and other partners, including shared parking on sites external and adjacent to the project area. More information about parking can be found on pages 189–190 of the *East and South Vancouver Barracks Draft Master Plan and Environmental Assessment*.

Comment: A few commenters, including the Nisqually Tribe, expressed concern about whether the National Park Service should own and manage the East and South Barracks, suggesting that the entire property, or portions thereof, should be turned over to other entities.

Response: On June 30, 1961, Congress passed an act (75 Stat. 196) that redesignated Fort Vancouver National Monument as a national historic site and enlarged the boundaries of the park to include the East and South Barracks, as well as other areas. Consistent with the 1961 legislation, the National Park Service retains ownership of all structures and properties within the East and South Barracks and, as such, is part of Fort Vancouver National Historic Site. In addition, the National Park Service will maintain the buildings that it intends to occupy and will retain responsibility for maintenance of the HBC Cemetery grounds. The National Park Service will explore a variety of approaches to adaptively reuse the structures, including appropriate arrangements such as leasing. However, under no circumstance will the National Park Service transfer ownership to another entity.

Comment: Some commenters, including the City of Vancouver, suggested that the National Park Service should include general residential use as part of the preferred alternative, while others made suggestions for specific types of overnight lodging such as hotels, elder hostels, and educational camps. Other commenters expressed support for not including residential use as a component of the preferred alternative.

Response: During the planning process, the National Park Service fully considered the topic of residential use by the public in the East and South Barracks. Alternative B explores the potential impacts for reusing select buildings for this purpose. However, the National Park Service has several concerns about general residential use, so it was not integrated into the preferred alternative. The most important of these concerns is that rehabilitating historic structures into housing units could more easily conflict with *The Secretary of the Interior's Standards for the Treatment of Historic Properties* compared to office uses because they would require substantial modification of historic, character-defining features. Further, the

financial feasibility study (Booz Allen Hamilton 2011) indicated that office use would be overall best suited to this site and equally as profitable as residential.

In addition, housing is already available nearby in the West Barracks and Officers' Row, in buildings more compatible to this function—for instance, buildings that were originally designed and constructed as duplexes or single-family residences. The preferred alternative, as presented on page 55 of the master plan, overnight accommodations for educational groups (for instance, educational camps or elder hostels) are a desired reuse within the project area. Building 746 is one structure that may potentially be suitable for this type of overnight use.

Comment: A few commenters expressed concern about the use of traditional methods to interpret the site, suggesting that high tech methods of interpretation are needed to attract new and young audiences. They also suggested that updated utilities such as wireless Internet would be essential.

Response: Interpretation and outreach will be consistent with the long-range interpretive plan, and will be addressed in future NPS interpretive planning and implementation documents. Common to all alternatives is the upgrade of utilities, which will also address innovative technological and informational expansion.

In addition, on page 52 of the master plan, it states that interpretive opportunities could be handled, "primarily through non-personal services such as interpretive waysides, self-guided walking tours, personal media . . .." The park has a growing expertise and is an NPS leader in developing and utilizing mobile devices to interpret and educate, including developing place-based smartphone applications. The inclusion of the East and South Barracks within the park's boundaries only increases the opportunities to develop and utilize additional mobile device platform applications as well as other modern interpretive tools.

Comment: The Ke Kukui Foundation expressed a desire for an arts and cultural center in building 748 to recognize Native Hawaiian culture.

Response: Specific proposals for adaptive reuse will be evaluated on a case-by-case basis. Although interpretation of Native Hawaiian culture is not specifically called out in the environmental assessment, interpretation of the diverse multicultural population of the Village, including the significant role of Native Hawaiians, is part of the selected alternative. Park staff will pursue further development of interpretive themes upon plan implementation, in keeping with the park's long-range interpretive plan.

Comment: Some commenters expressed concern about the planning process used by the National Park Service. One commenter, for example, was concerned that there was not enough ongoing coordination with the National Park Service throughout plan development. Another commenter was concerned that previous comments submitted during public scoping were not adequately addressed in the environmental assessment.

Response: The National Park Service hosted numerous internal planning meetings with an interdisciplinary team (IDT), including the National Park Service, City of Vancouver, and Fort Vancouver National Trust, to obtain preliminary ideas on the scope of the plan as well as potential issues and impact topics. Following that process, the park conducted public scoping from March 20 through May 1, 2010. The National Park Service made effort to engage agencies, organizations, and members of the public during the development of the environmental assessment. During public scoping, the National Park Service conducted public meetings in April 2010 to gather the public's ideas on what the plan should address. Listening stations were set up at the two meetings to discuss vision, goals, and concerns about what the Fort Vancouver National Historic Site could be. Comments were received through mail, the project website, email, newspaper articles, and recording of comments on flipcharts at the meetings. In addition to similar methods of receiving comments, the National Park Service and the management team received comments through Facebook and Twitter. All public scoping comments were summarized in the *Public Scoping Summary Report* that was posted on http://parkplaning.nps.gov/fova. The National Park Service considered all of the public scoping comments when developing alternatives.

A similar participatory process was also used for the public review process of the environmental assessment in February 2012. The planning process emphasized open and inclusive communication to engage the public and to understand their desires and concerns. In addition to receiving comments for the EA review period, the National Park Service and the management team extended the comment period to give the public additional time to get their comments sent or entered into the Planning, Environment and Public Comment (PEPC) site. A total of 26 federally recognized American Indian tribes and Native Hawaiian groups affiliated with the Fort Vancouver National Historic Site have been invited to participate in government-to-government consultations to address concerns about cultural resources. Many of these have been involved in ongoing consultation.

Responses to substantive comments made on the environmental assessment are responded to through these errata sheets. There were many other comments, which either supported the project or did not raise new issues, that are not contained in the errata. Responses to every individual comment are not required for an environmental assessment.

Comment: Many commenters expressed a high level of support for the preferred alternative concept and its specific proposals. However, some commenters, including the Nisqually Tribe and others, expressed concern about the types and levels of public use proposed, including the proportion of public versus private commercial uses. For instance, some commenters suggested that more space should be used for commercial purposes—similar to the Officers' Row model. Others thought that the preferred alternative contained too much of a government presence. Some also expressed concerns that commercial use in the barracks would lead to competition between the National Park Service and private businesses.

Multiple tribes expressed concern about high levels of use or commercial/leasing activities taking place on the grounds of the HBC Cemetery, or inside historic buildings erected by the U.S. Army on those grounds. Some tribes have indicated a high level of concern regarding the

potential development of day care functions or other uses on the grounds or in the buildings that are not appropriate in a cemetery.

Response: The National Park Service believes that the selected alternative contains a good mix of public and private use in the barracks. While the focus of the selected alternative is office space, which would account for approximately 54% of the building usage, many of these buildings would allow some public access. The National Park Service would seek to attract public agencies and organizations with compatible missions to the National Park Service to occupy office space. Having the National Park Service and other federal agencies as an anchored hub creates benefits and stability for the campus, as this could attract conferences and meetings, and generate educational opportunities and events that would benefit both government employees and the public.

Nearly half of available building space is essentially split between commercial and public benefit/use to provide a balanced mix of opportunities for the public. Approximately one-third of total building space would be designated for nongovernmental or nonprofit organizations and one-fifth would be for retail and restaurants. These uses may include nonprofit and community functions and limited commercial use such as retail shopping, restaurants, and a day care. Overnight accommodations may be provided to support conferences, environmental field schools, school groups, and elder hostel groups. These new uses of the buildings and grounds will invite public use, which will also contribute positively to the community and the region. In addition to office use, a mix of other uses that integrate well with the remaining area of the Vancouver National Historic Reserve would be encouraged. It is not expected that new commercial use in the barracks would lead to competition between the National Park Service and nearby businesses because there would be a small percentage of these uses overall compared to the surrounding community, and the commercial services available in the barracks, such as restaurants or retail, would primarily be used by those who work in and visit the park.

Buildings 987, 721, and 722 are on the cemetery grounds. The selected alternative does not indicate the development of a day care within the HBC Cemetery. Park staff will continue tribal consultation to seek concurrence on appropriate management and interpretation of the cemetery grounds.

Comment: One commenter expressed concern with the accuracy of the historical facts presented.

Response: The historical background section accurately highlights the most important historical events associated with Vancouver Barracks, including pre-contact indigenous history and the Hudson's Bay Company history. It was not meant to be a comprehensive historical treatise of Fort Vancouver National Historic Site. The information presented was derived from previously published, peer-reviewed, and widely utilized historical documents that are commonly available and acknowledged for their historical accuracy.

Comment: Commenters, including the National Parks Conservation Association, expressed concern about the cost of implementing the master plan and that sufficient funding may not be available.

> **Response:** The National Park Service thoroughly considered the financial implications of implementation of the master plan preferred alternative. The cost of rehabilitating the site is substantial; however, financial analysis strongly indicates that investment in and rehabilitation of the site will ultimately prove beneficial to the National Park Service through, at a minimum, the elimination of deferred maintenance at the site and the reduction of the cost of operations and maintenance of the site to the National Park Service. Currently, the National Park Service does not have all of the funds to immediately implement the master plan in its entirety. However, the National Park Service has developed a strategy to implement the plan in phases over a period of years with its own capital, reinvested lease revenue, and the assistance of partners and investors.

Comment: A few commenters, including the Nisqually Tribe, expressed the viewpoint that an environmental impact statement (EIS) should have been prepared rather than an environmental assessment (EA) because of the potential for significant impacts to archaeological resources including human remains and artifacts.

> **Response:** The East and South Vancouver Barracks were included in the *Fort Vancouver National Historic Site General Management Plan and Environmental Impact Statement* (2003). The *East and South Vancouver Barracks Draft Master Plan and Environmental Assessment* was "tiered" from this environmental impact statement in accordance with section 1508.28 of the National Environmental Policy Act (NEPA). The act states that it is appropriate to tier an environmental assessment from a program, plan, or policy environmental impact statement to a program or plan of lesser scope or to a site-specific analysis. Further, the National Park Service completed an environmental screening form early in the planning process, considered the significance criteria identified in section 1508.27 of the act, and determined that an environmental assessment was appropriate for the master plan. The risks of the plan have been adequately identified and NPS technical experts have analyzed the impacts to archaeological resources and determined them to be less than significant. As stated in the environmental assessment, impacts to archaeological resources, human remains, and artifacts are expected to be minor, permanent, local, and adverse. If archaeological resources cannot be avoided during ground-disturbing activities, mitigation measures will be implemented to ensure any impact remains minor. The National Park Service is consulting with the Advisory Council on Historic Preservation, the Washington State Historic Preservation Officer, and tribes to finalize a programmatic agreement to address archaeological resources under section 106 of the National Historic Preservation Act.

Comment: Commenters, including the Nisqually Tribe and participants of tribal consultation meetings, expressed desire that archaeological excavations throughout the property not become open to increased access for the public and universities. The Nisqually Tribe also expressed that the National Park Service should provide more details on specific noninvasive and nondestructive methods that will be used for surveying and testing in the HBC cemetery.

Response: The National Park Service has developed a public archaeology program at Fort Vancouver National Historic Site that is consistent with national historic preservation law, regulations, enabling legislation of the park, and NPS policies. Public outreach associated with archaeology and the unique historic and scientific data it collects has increased public understanding and knowledge of the park's national significance, its resources, and its interpretation. The Volunteers-in-the-Park (VIP) program for cultural resources engages the community to directly participate in archaeological excavations and analyses, museum curation, and outreach. Educational programs help teach history, science, and math. The programs increase public awareness of the importance of preservation of cultural resources, but also create additional stewards who understand, interpret, and preserve these cultural resources. Public archaeology and cultural resources interpretation are necessary to appropriately articulate the boundaries of the HBC Cemetery, the Village, and indigenous history through interpretation. The urban nature of the park in a highly populated area supports the belief that cultural resources protection requires public interpretation and knowledge as it is impossible to keep the unique nature of the resources from the public.

The National Park Service routinely uses nondestructive survey methods to augment subsurface excavation methods to minimize impact to sensitive subsurface resources. The results of these nondestructive survey techniques are routinely shared with the consulting tribes as part of the completed archaeological reports necessary for these undertakings.

Comment: One commenter expressed that in the preferred alternative, NPS staff would be dispersed in different locations throughout the park and that this would be an inefficient use of human resources.

Response: Under the preferred alternative, staff would be stationed in new locations, with some park personnel moving to the East and South Barracks. It is already the case that NPS staff members are distributed in separate locations throughout the park. At Fort Vancouver National Historic Site, like many other national parks, proximity of staff does not necessarily result in greater efficiency. It is important to have NPS staff close to the resources they are charged to protect, interpret, or maintain. For instance, some NPS staff is currently stationed at the visitor center area while others are located in the HBC fort area where they frequently conduct interpretive programs. The relinquishment of the East and South Barracks by the U.S. Army presents the National Park Service with a tremendous opportunity to greatly increase operational efficiency by relocating administrative, maintenance, storage, and curatorial functions into larger and more appropriate workspace in the East and South Barracks. For example, park headquarters and other NPS administrative functions would be relocated to either building 991 or 993, while building 400 would become the primary NPS maintenance shop. These functions are currently underserved by space limitations and other issues. Relocation would greatly increase the available space for these functions and offer other benefits to the National Park Service and its partners.

Comment: One commenter expressed that the quantity and location of public restrooms shown in the preferred alternative would be insufficient.

Response: Specific programming for each building was not explored in-depth in the plan. This plan is meant to provide a broad guidance for adaptively reusing the existing facilities. The selected alternative will incorporate public restrooms into building 410 and other key buildings throughout the site.

Comment: One commenter expressed that it would be very challenging for current NPS staff to manage and coordinate the various operations proposed in the preferred alternative, in addition to current responsibilities.

Response: The National Park Service would need to increase staffing levels to accommodate expanded operations and needs. NPS staff would seek to defray costs to the government with income generated through lease agreements from tenants and would work with its partners as they consider the various options available to accomplish this work. Certain NPS functions (such as administration, maintenance, and cultural resources) will move from crowded and/or unsuitable space to more appropriate space in the East and South Barracks. Staffing tied to particular project implementation may not be permanent and will be facilitated by project-specific funding. It is intended, and expected, that future maintenance costs for any building not directly used or occupied by the National Park Service for operational or visitor use would be supported by revenue derived from the lessee.

Comment: One commenter expressed concern that retail activities shown in the preferred alternative might not be compatible with the historic setting and with the National Park Service mission.

Response: In order to evaluate suitable types and locations of adaptive reuse, the planning team applied conventional land use categories to buildings in the East and South Barracks. These reuse categories are intended to be general in order to preserve flexibility in plan implementation. By assigning potential uses to particular buildings, the National Park Service is not officially zoning buildings for specific uses. Potential land uses identified under each alternative, including the preferred, is advisory in nature only and should not be construed as limitations on the specific uses that each building may accommodate. When proposing general categories of use, the National Park Service considered factors such as historic and recent uses for buildings, functional suitability of those buildings, and the impact of proposed reuse on the immediate surroundings.

Within the East and South Barracks, retail activities would be selected to be compatible with the historic, public setting. These may include bike rentals and bookstores, or certain types of restaurants. Day care was also identified as an appropriate retail activity. The National Park Service will retain final approving authority for proposed reuse and tenant improvements for all barracks buildings and grounds. In consultation with the Washington State Department of Archaeology and Historic Preservation, the Advisory Council on Historic Preservation, and, as appropriate, the City of Vancouver and other partners, the National Park Service will assess the suitability of each proposed reuse for each historic structure. In all cases, preserving the historic integrity of historic structures, archaeological sites and resources, and cultural landscapes will serve as the primary criteria for review and consideration.

Comment: One respondent commented that the historic Fort Vancouver gardens should be moved to their original site.

Response: For many years, Fort Vancouver National Historic Site has been restoring and/or reconstructing select structures and cultural landscape features from the HBC period for the purposes of historic preservation, education, and interpretation. These actions have taken place south of East Fifth Street in areas adjacent to the South Barracks. In addition to the HBC fort, the National Park Service has reconstructed structures from the HBC Village and replanted portions of the historic orchard in the original location. A replica exhibit garden has also been planted. The master plan supports and expands upon these long-standing efforts. For example, it proposes extending the orchard to the north and west of the HBC fort entrance, reestablishing parts of the historic garden landscape, and potentially reconstructing the historic Summer House. These proposed actions would occur in their original locations, pending additional research. Therefore, the historic orchard and gardens are proposed for expansion on their original site.

Comment: One commenter expressed disappointment that the National Park Service is not proposing a "Williamsburg of the West" model, in that living history, costumed interpretation, and historic restoration is not the primary focus of the preferred alternative.

Response: Interpretation and outreach will be consistent with the long-range interpretive plan and addressed in future NPS interpretive planning and implementation documents. Fort Vancouver National Historic Site is nationally recognized throughout the national park system for using costumed interpretation. In addition, the park is a leader in digital storytelling. Although the specific term "Williamsburg of the West," is not used in this document, the concept is supported since there are many elements within the preferred alternative and elsewhere in the master plan that utilize historic interpretation models consistent with innovative heritage education and outreach programs. Specifically, a broad concept of the preferred alternative statesthat "[e]ducation is a key part of this alternative, with an emphasis on interpreting the history of military occupation and the HBC in different locations throughout the Barracks." Specific interpretive programs and events are defined on pages 52–53 of the master plan, which include the rehabilitation of areas of buildings 991 and 993 to recreate the historic appearance of U.S. Army barracks buildings, special interpretive events, and public demonstration events related to cultural heritage. Living history and costumed interpretation programs can both be used in each of these examples.

Comment: Some commenters suggested that the National Park Service should delineate the HBC Cemetery and protect it, so that the public will be aware of its presence.

Response: NPS staff has been working through government-to-government consultations with federally recognized American Indian and Native Hawaiian groups to determine the best approach to protecting and managing the HBC Cemetery, and this consultation will continue in the future. To date, different Native American and Native Hawaiian individuals and groups have expressed a variety of opinions about the cemetery. Some believe the cemetery should be delineated and interpreted, while others feel that the National Park Service should not draw attention to the cemetery by marking it in this way. The National Park Service will

retain ownership of the cemetery and will maintain full responsibility for protecting and maintaining this critically important site. The master plan does propose some strategies for protection, including a minor addition to the boundary of the national historic site, which would ensure that the entire cemetery grounds would fall under direct ownership and management of the National Park Service. This boundary adjustment would help the National Park Service protect the entire cemetery. The proposed removal of asphalt and parking lots within the HBC Cemetery will create a more respectful, contemplative, park-like setting.

Comment: Overall, the National Park Service received a lot of support for the preferred alternative (alternative C, "A Sustainable, Historic Campus for Public Service"). However, one commenter expressed that more consideration should be given to alternative A, the no action alternative. A few commenters suggested that more elements, such as lodging and amenities for visitors and different types of restaurants, from alternative B, "A Vibrant Urban District," should be integrated into the preferred alternative. A few commenters, including the Nisqually Tribe and participants of tribal consultation, expressed that more elements of alternative D, "A Historic, Educational Campus" should be included.

Response: The National Park Service used a decision-making process called "choosing by advantages" in a workshop in January 2011 to evaluate the draft alternatives and develop an agency-preferred alternative. During this exercise, the advantages of each alternative were ranked. Page 31 of the environmental assessment provides more information on this process and the evaluation factors used. The no action alternative describes the baseline for comparison with other alternatives. It does not meet the goals of the project or address the purpose and need. Alternative C was found to have the most advantages among all the alternatives. Alternative C, now the selected action, represents the mix of uses, management actions, and site planning concepts that best support the mission of the National Park Service, the legislated purpose of Fort Vancouver National Historic Site, and the vision and goals for the environmental assessment.

Comment: Commenters, including the Nisqually Tribe, expressed concern about ground disturbance within the HBC Cemetery during excavation and the inadequacy of the environmental analysis related to this topic. These concerns relate to proposals in the preferred alternative, including parking lot removal and utility upgrades. The Nisqually Tribe suggested that the level of impact would be greater than indicated in the environmental assessment.

Response: The utility upgrade plan for the East and South Vancouver Barracks would be in effect for all of the alternatives. An archaeological testing project will occur as part of the planning for any utility work, and the project will utilize the best available archaeological methods, including remote sensing (ground-penetrating radar, magnetometry, and electrical resistivity) and controlled excavations. The results of this testing will inform the final construction drawings for the most appropriate utility corridors and methods to attempt to avoid burials or other significant cultural resources. As part of this process, a Native American Graves Protection and Repatriation Act (NAGPRA) plan of action is being prepared in consultation with the tribes to help guide the testing and utilities upgrade efforts. The removal of the parking lot within the cemetery boundary will be assessed with further

consultation with federally recognized American Indian Tribes and Native Hawaiian groups. It is possible that the landscape could be restored without any ground disturbance. Section 106 review of the utility project is currently underway with the intention to minimize impacts to any subsurface cultural resources or cultural landscape resources that contribute to National Register of Historic Places eligibility of the Vancouver National Historic Reserve National Historic District. As part of the section 106 process, additional consultation will occur with Native American tribes and Native Hawaiian groups. As noted above and stated in the environmental assessment, impacts to archaeological resources, human remains, and artifacts is expected to be minor, permanent, local, and adverse. If significant archaeological resources cannot be avoided during ground-disturbing activities, mitigation measures will be implemented to ensure any impact remains minor.

Comment: The Nisqually Tribe expressed that the National Park Service should consider repatriation of human remains and indigenous artifacts to be housed with the Tulalip Tribes. Commenters indicated that the tribes or others were more appropriate than the National Park Service to curate collections. Tribal consultation participants voiced concerns about reburial in alternate locations than original unearthing.

Response: The park is currently working on a NAGPRA plan of action with consulting American Indian tribes and Native Hawaiian groups regarding intentional excavations within the HBC Cemetery. A plan for inadvertent discoveries of human remains and funerary objects within the remaining area of the East and South Vancouver Barracks has been provided to the tribes and state historic preservation officer for their review. The National Park Service is committed to meaningful and respectful consultation with indigenous communities on the disposition of NAGPRA items. The National Park Service is required to retain ownership of scientifically acquired collections.

The National Park Service will retain responsibility under the plan for landscape and maintenance and will work to protect the underground resources. The National Park Service understands the importance of the cemetery and the Village and federally recognized tribes will be involved in the details as the master plan moves towards implementation.

Comment: A few commenters expressed concern that Fort Vancouver National Historic Site should remain a National Park and not allow local decision makers to manage the site.

Response: The preferred alternative recognizes that the East and South Vancouver Barracks will become a part of Fort Vancouver National Historic Site and will be managed consistently with federal regulations, executive orders, and NPS policies. The National Park Service will continue to work with the identified partners of the Vancouver National Historic Reserve (the City of Vancouver and the State of Washington) in a cooperative manner to ensure that all of the cultural and natural resources present within the Vancouver National Historic Reserve are adequately managed in perpetuity.

Comment: Many commenters provided comments with suggested uses for buildings in the barracks, changes to the cultural landscape, specific interpretive exhibits, or the ideas for reuse.

Response: The master plan was intended to provide overall guidance on building reuse in the East and South Barracks. The environmental assessment does not address specific building tenants and is not intended to be a detailed static plan. The master plan provides a collection of management strategies, specific actions (such as the infrastructure upgrades), and conceptual site plans. The environmental assessment does not go into the level of detail that these comments propose. Decisions on tenants for the buildings will be made on a case-by-case basis.

Comment: The Nisqually Tribe expressed that the National Park Service should consider expanding impact effects for environmental justice from "only the surrounding community" to include others (specifically American Indians and Native Hawaiians) tied to Fort Vancouver National Historic Site per Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations."

Response: The National Park Service has been consulting with 26 federally recognized tribes and Native Hawaiian organizations as part of the development of this document. These consultations have resulted in a meaningful dialogue between the National Park Service and these federally recognized tribes and Native Hawaiian organizations, and are resulting in the development of a NAGPRA plan of action specific to the HBC Cemetery area and proposed undertakings within the cemetery. Pursuant to Executive Order 12898, and as stated on page 26 of the environmental assessment, the National Park Service states that "actions proposed in this environmental assessment would not create disproportionately high or adverse human health or environmental effects on minority or low-income populations of the surrounding community..."

Comment: The Nisqually Tribe expressed that the National Park Service should consider ethnographic resources as an impact topic and wondered how the National Park Service came to the determination that no ethnographic resources existed for the study area.

Response: The National Park Service has been engaged in active, government-to-government consultation with 26 federally recognized tribes and Native Hawaiian organizations on undertakings revolving around the HBC Cemetery and the HBC Village for over a decade. To date, none of the consulting tribes has indicated that there are any ethnographic resources (as defined in the environmental assessment) present within the study area. The National Park Service will continue to work with these consulting parties in a sensitive and proactive manner, including on how to best manage the HBC Cemetery and the HBC Village area.