



# United States Department of the Interior

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IN REPLY REFER TO:

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June 18, 2008

Memorandum

To: Northeast Regional Director

From: Superintendent, Cape Cod National Seashore

Subject: Finding of No Significant Impact (FONSI) and Alternative Selections for the Marconi Area Facilities Improvements

## Background

This memorandum records the selection of a management alternative by the National Park Service (NPS) from those presented in the *Environmental Assessment: Marconi Area Facilities Improvements*. The decision is made after public and interagency review and comment, careful consideration of environmental effects, legislative mandates, applicable regulations, and NPS policy.

The National Environmental Policy Act (NEPA) requires consideration of the environmental effects of proposed federal actions. The act ensures that environmental information is available to public officials and the public before decisions are made and actions are taken. The NPS prepared the composite Environmental Assessment (EA) in compliance with NEPA, the Council on Environmental Quality (CEQ) regulations, and the NPS Director's Order 12 (DO-12). The composite EA documents the alternatives considered for the Marconi Area facilities improvements. It analyzes the potential impacts related to the proposed actions, as well as the No Action Alternative, and summarizes potential environmental consequences of implementing the alternatives. This memorandum signals completion of the EA process as required by NEPA.

## Summary of Proposed Actions

The proposed actions are four facility construction improvements near the Marconi Headquarters and maintenance facilities in South Wellfleet, MA (commonly known as the Marconi Area).

These projects have been considered in a single EA to facilitate an integrated assessment of effects to the Marconi Area. The purposes of these projects are to improve employee and visitor safety, contribute to regional transportation goals, produce a more efficient workplace, and to enhance emergency response capabilities. Each of the four are described as follows:

Helipad Improvement: The NPS proposes to improve the helicopter landing site (helipad) in the easternmost portion of the Marconi Headquarters rear employee parking lot at Cape Cod National Seashore (CCNS). Helipad improvements would be based on the Interagency Helicopter Operations Guide (IHOG). IHOG is based on the Federal Aviation Administration (FAA) regulations for heliport design.

Waterline and Hydrant Extension: The NPS proposes to construct a waterline extension from the current water system to a proposed hydrant to be located near the State Highway Route 6 and Marconi Beach Road intersection (located just outside of the park boundary). The CCNS water source is located at the end of Marconi Residence Road in South Wellfleet. The extension would cover a distance of 700 feet. This project is being undertaken in cooperation with the Wellfleet Fire Department, and enhances fire management capabilities of the town and the seashore.

Transit Shelter: The NPS proposes to site and construct a transit bus stop and shelter for the Outer Cape public transportation system (FLEX Bus). The shelter and associated paving would provide a shelter to the weather for riders and be a focal point for drop-off and pick-up of mass transit users in South Wellfleet.

Fire Cache: The NPS proposes to construct a new fire cache garage next to existing facilities at the Marconi maintenance area. The existing facilities are inadequate to support the fire management program. The new facility would have dedicated storage space and would consolidate all fire vehicles and fire equipment in one building thereby enhancing the efficiency and effectiveness of the fire management program.

## **Summary of Alternatives and Alternatives Considered but Rejected**

### Helipad Improvement:

The helipad would serve as a safe site for helicopters to land when involved in reconnaissance operations, emergency medical situations, and emergency wildfire operations. The helipad would serve both the park and the community by providing increased safety and emergency response for the surrounding residents of the Outer Cape once upgraded to meet current design standards.

The EA evaluated the potential impacts of helipad improvements under the context of two alternatives.

**Alternative 1:** The No Action Alternative - The NPS would not construct an improved helipad. Helicopters would continue to land on a paved but non-regulated site in the Marconi Area that does not meet current safety standards.

**Alternative 2:** The NPS would improve the current helipad at the Marconi Area. Improvements would include: construction of a perimeter fence and perimeter lighting; construction of an equipment/aviation shed; installation of underground electrical service; and placement of a swinging gate and wind sock stanchion. Additionally, the helipad landing area would be resurfaced with bituminous concrete. Improvements would take place in stages over a period of up to several years. Alternative 2 was the preferred alternative.

One additional alternative was considered, but rejected. The alternative to construct a helipad at a different site was deemed unrealistic and not cost effective. The proximity of the fire cache and the Marconi maintenance area to the proposed site provides personnel, communications, personal protective equipment, parking, supplies and other specialized equipment. Further, the proposed site utilizes a previously disturbed area that is paved and partially cleared of vegetation.

#### Waterline and Hydrant Extension:

The current water and fire hydrant system serves the Marconi Area only. There are five hydrants that can be utilized by fire departments for mutual aid tanker shuttle operations, and all hydrants are located near NPS facilities. In the Marconi Area the closest hydrant to State Highway Route 6 is 0.26 miles (1,370 feet); however fire apparatus must drive 0.72 miles (3,800 feet) to effectively enter, access and exit hydrant site(s) and turnaround. This delay would be minimized by providing a new hydrant near the State Highway Route 6 and Marconi Beach Road intersection.

The NPS proposed to construct a waterline extension from the current water system to a proposed hydrant located near State Highway Route 6 (Figure 5). The CCNS water source is located at the end of Marconi Residence Road in South Wellfleet. The extension would cover a distance of 700 feet.

The EA evaluated the potential impacts of constructing a waterline and hydrant extension under the context of three alternatives.

**Alternative 1:** Under the No Action Alternative no waterline extension would occur. Emergency fire equipment would continue to fill from hydrants near the headquarters building. Turn-a-round times for refilling engines, tankers and tenders would remain at maximum intervals.

**Alternative 2:** The NPS would plumb into the current Marconi Area water system at an existing valve at the terminus of Marconi Maintenance Road and construct a waterline extension to Marconi Beach Road / State Highway Route 6 intersection. This alternative would utilize the shortest and most direct route. A fire hydrant would be placed at the end of the waterline

extension. The waterline extension would run 700 feet under a former woods road. Construction would take place over several weeks and would be completed by NPS and Town of Wellfleet employees. Alternative 2 was the preferred alternative.

**Alternative 3:** The NPS would plumb into the current Marconi Area water system by adding a new valve near Marconi Maintenance Road and construct a waterline extension from the new valve to Marconi Beach Road / State Highway Route 6 intersection following the road shoulders of Marconi Beach and Marconi Residence roads (a distance of approximately 900 feet). A fire hydrant would be placed at the end of the waterline extension. Construction would take place over several weeks and would be completed by NPS and Town of Wellfleet employees.

#### Transit Shelter:

A public transportation initiative to construct 8-12 public transportation shelters on the Outer Cape has been discussed for several years. Since 2006 there have been follow-up meetings focused on additional coordination and implementation of various aspects of the Outer Cape Long Range Transportation Plan which was completed in 2004. To date there have been discussions about the overall transit shelter concept, their design and function, and general location considerations.

Two shelters are being considered within Cape Cod National Seashore at this time – one in South Wellfleet and one at the existing bus stop at Salt Pond Visitor Center in Eastham.

A bus stop and shelter for the Outer Cape public transportation system is needed in South Wellfleet to provide more comfortable accommodations for passengers. A safe shelter with a resting place, schedule information, and protection from the elements is desired. A bus stop exists at Farrell's Market area, but it does not presently have a transit shelter. The natural beauty of the area and the lure of the beaches have resulted in an increase of visitors, contributing to traffic problems for the Outer Cape of Cape Cod and the CCNS. A new public transportation system was started in 2006 to help relieve the traffic and air quality problems using Federal Department of Transportation funds allocated to the NPS.

The EA analyzed the potential impacts of alternatives of constructing a bus stop and shelter under the context of three alternatives.

**Alternative 1:** Under the No Action Alternative neither a bus stop nor a shelter would be established.

**Alternative 2:** The NPS would construct a bus stop and shelter at the Marconi Area entrance. Alternative 2 was the preferred alternative.

**Alternative 3:** A bus stop and shelter would be located approximately 0.75 miles north of the Marconi entrance at the South Wellfleet Village Center.

### Fire Cache Construction:

The proposed cache building would be a two-story structure with a footprint of 2,000 sq. feet (40 feet x 50 feet) (Figures 7, 8, 9). Additional paving around the building would directly impact an area of 0.14 acres. The cache would have architecture similar to other Marconi maintenance facility buildings, be cost effective and easily maintainable, and have the capacity to be expanded, moved, and/or outfitted with utilities depending on future needs. A supplemental heating source, an outside wood-fired furnace, is proposed for the cache to minimize use of conventional heating fuels.

The proposed cache would have four garage bays, two on each side, to allow drive through access. The facility would be sited and designed to avoid disrupting vehicle operations at the South District Maintenance facility. Vehicle entry, egress, and line-of-sight, especially for larger trucks and truck/trailer combinations cannot be restricted.

The EA analyzed the potential impacts of alternatives of constructing a new fire cache under the context of three alternatives.

**Alternative 1:** Under the No Action Alternative no new construction would occur. The fire management program would continue to operate with office, trucks, and equipment in dispersed locations.

**Alternative 2:** The NPS would construct a new two-story 2,000 sq. foot (footprint) fire cache building located at the current site of the manual fire weather station. Alternative 2 was the preferred alternative.

**Alternative 3:** The NPS would construct a new two-story 2,000 sq. foot fire cache building in the southwest corner of the Marconi maintenance yard.

Two alternatives were considered but rejected: a) construction of a new facility on the concrete pad adjacent to the rear headquarters parking lot, and b) relocation the fire cache to the Highlands Center in Truro, MA.

### **Environmentally Preferred Alternatives, Rationale for their Identification and the Alternative Selection for each of the Project Actions**

The CEQ regulations implementing NEPA and DO-12 require the NPS to identify the “Environmentally Preferred Alternative” in NEPA documents, including EAs. The Environmentally Preferred Alternative is the alternative that causes the least damage to the biological and physical environment and that best protects, preserves, and enhances historic, cultural, and natural resources. In this case, the NPS has identified the environmentally preferred alternatives listed below:

Helipad: The NPS selects Alternative 2 for implementation of improvement to the current helipad. The existing site near the CCNS Headquarters employee parking lot will be upgraded to IHOG and FAA guidelines.

Waterline and Hydrant Extension: The NPS selects Alternative 2 – Woods road extension. Alternative 2 is the shortest and most direct route from the existing water distribution system to the hydrant location minimizing the amount of ground disturbance.

Transit Shelter: The NPS selects Alternative 2 – Construct a new transit shelter in the Marconi Area. The new shelter at Marconi would address operational and safety issues for the transit system and best meets the criteria for siting the bus stop. Little or no adverse impact is anticipated. Transit rider access to park facilities in South Wellfleet would thus be improved.

Fire Cache: The NPS selects Alternative 2 – Fire cache construction (new) at existing weather station. This alternative fulfills the need for additional fire cache space that was approved in 1993 in response to a call for NPS Fire Facilities Construction projects. The documented need was for vehicle garage and equipment storage space near or adjacent to the current fire management offices located at the Marconi Maintenance Area. Construction of offices, kitchen space and restrooms were not requested.

### **Summary of Public and Interagency Involvement**

In accordance with Director's Order 12, Conservation Planning, Environmental Impact Analysis, and Decision-making; coordination and public involvement in the planning and preliminary design of the proposed action was initiated early in the process.

A public comment period was held from May 15 to June 15, 2008. The public was informed of the public comment process by a media news release on May 15, 2008. The Environmental Assessment was posted on Planning, Environment and Public Comment and park websites on May 15, 2008. Members of the Cape Cod National Seashore Advisory Commission and public agencies were mailed copies of the EA. Additional copies of the EA were mailed to the six lower Cape town libraries and to identified interested parties. No comments from the public were received.

Written comments were received from the following government agencies:

The Commonwealth of Massachusetts Division of Fisheries and Wildlife, in a letter dated May 16, 2008, assigned a Natural Heritage and Endangered Species Program (NHESP) tracking number 08-24656 for the projects. By letter of June 13, 2008, the NHESP concluded that "the proposed projects would not result in a prohibited "take" of the Eastern Box Turtle, Vesper Sparrow, Coastal Heathland Cutworm, Gehard's Underwing Moth, and the Dune Noctid Moth". NHESP stated their belief although the proposed project will result in a prohibited "take" of Broom Crowberry, that "the proposed mitigation plan for the impacts to Broom Crowberry are consistent with the permitting standards for a Conservation and Management Permit and will result in a net benefit to this state-listed species". NHESP further expressed appreciation of the

NPS efforts to substantially meet state-listed protected species Massachusetts Endangered Species Act requirements”.

On May 27, 2008 the Massachusetts State Historic Preservation Officer concurred with the NPS determination of no adverse effect for the Development of Facilities at Marconi Area of CCNS.

The Commonwealth of Massachusetts Office of Coastal Zone Management (CZM) in a letter dated June 16, 2008 stated that the proposed projects are located within the defined Massachusetts Coastal Zone, however they fall below the threshold that CZM uses to require federal consistency review, therefore a formal decision from the office is not necessary. They further stated that if other state environmental authorizations are granted, then CZM consistency is presumed (no further state authorizations are needed for these projects).

The Wellfleet Fire Department (WFD) in a letter dated June 2, 2008 strongly supported the NPS preferred alternatives for the helipad improvement, waterline and hydrant extension, and fire cache construction projects. WFD was neutral on support of the transit shelter project as it is outside the department’s area of responsibility.

## **Environmental Consequences**

The Environmental Assessment provides more detail on the environmental consequences of the selected alternatives and alternatives not selected. These alternatives will favorably impact the surrounding community by improving employee and visitor safety, contributing to regional transportation goals, producing a more efficient workplace, and enhancing emergency response capabilities through the four construction projects.

### Environmental consequences of selected alternatives:

Adverse impacts from the selected alternatives to natural resources, including state listed-species, will be mitigated through avoidance, relocation, monitoring or implementation of the broom crowberry mitigation plan found in Appendix A of the EA.

Some invasive species may colonize following construction projects. A combination of monitoring and removal will help reduce the spread of invasives.

Negligible long term impacts are anticipated for soil, water, and air quality resources. Temporary short-term impacts to air quality may result from the use of a wood fired furnace to produce supplemental heat for the new fire cache. These impacts will be minimized by: 1) installing a furnace that conforms to the best available control technology or lowest achievable emissions rate controls for criteria pollutants and compliance with air toxics limits for wood burning power generation; and 2) generally burning only on weekdays, during daylight hours from October to May, when fire management staff is on duty to load fuel wood.

No impacts are anticipated to cultural resources or historic structures. All of the construction project sites are in areas that have had previous mechanical soil disturbance from (primarily) the former Camp Wellfleet military era (ca. 1940 – 1960).

Environmental consequences of the alternatives not selected:

Helipad: Under the No Action Alternative there would be potential adverse impacts to the surrounding community by not providing a safe landing site for medical emergency airlifts, reconnaissance missions, or wildfire suppression efforts. Damage to natural resource communities and area cultural resources may result from the potential for larger wildfires.

Waterline and Hydrant Extension: Under the No Action Alternative water shuttle operations for fire suppression would remain at maximum response times adversely impacting the surrounding community. Trenching for Alternative 3 would have adverse impacts to natural resources as the length of trenching required is 200 feet longer than the selected alternative.

Transit Shelter: Under the No Action Alternative there would be no adverse impacts upon natural or cultural resources; and potential minor adverse impact upon public safety, surrounding community, and park management and operations. Under Alternative 3 there would be no adverse impacts upon natural or cultural resources, and moderate beneficial impacts to public safety and minor beneficial impacts to park management and operations. The alternative would have a negligible to minor beneficial economic impact on surrounding businesses in the South Wellfleet Village area and minor adverse economic impact to Farrell's Market.

Fire Cache: Under the No Action Alternative there would be potential long term adverse impacts to natural or cultural resources and to the surrounding community in the event of impeded fire suppression operations during wildfire events. There would be adverse impact to the seashore fire management operations. Alternative 3 would have no adverse impacts upon natural or cultural resources, public safety or the surrounding community. There would be adverse impacts to park operations.

**Why the Selected Alternatives will not have a Significant Effect on the Human Environment**

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

*Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts which require analysis in an EIS:*

No major or significant adverse or beneficial impacts were identified that would require analysis in an environmental impact statement. No impacts to cultural resources, soundscapes, water quality, land use, socioeconomics, energy resources, geology, marine and estuarine resources, federal protected species, lightscapes, Indian trust resources, floodplains, scenic resources, prime and unique farmlands, or park operations were identified.



Under the Selected Alternative for fire cache construction, short term daily negligible adverse impacts to air resources may occur. Beneficial impacts to park operations through reduced use of heating oil will be achieved in the long term.

Beneficial impacts to visitor and staff safety, and visitor use and experience will be long term and minor to moderate in intensity from enhanced emergency response capabilities and mass transit opportunities.

*Degree of effect on public health or safety:*

During construction of each of the four projects, short-term safety issues include visitor, employee and contractor worker safety, which will be mitigated by following Occupational Safety and Health Administration (OSHA) guidelines, and protecting visitors and employees during activities through the use of defined construction areas with restricted access as needed. The helipad, hydrant and fire cache projects will benefit emergency medical response and both structural and wildland firefighting capabilities of NPS and Town emergency workers. Visitors and residents in the surrounding community will have long term protection and enhanced safety from wildland and structural protection and improved search and rescue means.

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

There will be no long term impacts to historic, cultural, landscape and vista resources, prime or unique farmlands or ecologically critical areas, wetlands or wild and scenic rivers resulting from any of the Selected Alternatives.

After applying the National Historic Preservation Act's Criteria of Adverse Effect the NPS finds that implementation of the Selected Alternatives will have a no adverse effect on historic properties. On May 27, 2008 the State Historic Preservation Office concurred.

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

There were no highly controversial effects identified during either the preparation of the EA or the public review period.

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

There were no highly uncertain, unique or unknown risks identified during either preparation of the EA or the public review period.

*Degree to which the actions may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration:*

The Selected Alternative neither establishes a NPS precedent for future actions with significant effects nor represents a decision in principle about a future consideration.

*Whether the actions are related to other actions with individually insignificant but cumulatively significant impacts:*

No other significant or insignificant actions related to the Selected Alternatives were identified in the EA relating to wetland, coastal upland ecosystem and dune ecosystem resources, visitor and staff safety, and visitor use and experience.

The Selected Alternatives would have negligible to minor short term impacts state protected species of special concern. Impacts will be minimized by avoidance and following mitigation plan guidelines.

*Degree to which the actions 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 Alternatives will neither adversely affect districts, sites, highways, structures or objects listed on the National Register of Historic Places nor cause loss or destruction of significant scientific, cultural, or historical resources.

As per the Advisory Council on Historic Preservation's regulations 36 CFR Part 800, NPS notified the Massachusetts Historical Commission, the Mashpee Wampanoag Tribe and the Wampanoag Tribe of Gay Head-Aquinnah to use the NEPA process to comply with Section 106 of the National Historic Preservation Act.

*Degree to which the actions may adversely affect endangered or threatened species or critical habitats:*

The Seashore does not encompass any critical habitats formally designated pursuant to Section 4 of the Endangered Species Act. Seashore biologists have reviewed the proposed projects, the project area, existing data and maps, and the biology of federally listed species occurring within the Seashore and have determined that no federally listed species occur or could potentially occur in the project area. Further, Seashore biologists have also determined there is no potential for any impacts or adverse effects to federally listed species.

The Selected Alternatives will have minor short-term adverse impacts to state protected species of special concern. These impacts are related to potential habitat infringement during the construction phases of the four projects which will be mitigated by avoidance and following mitigation plan guidelines. The state agency charged with protection of state-listed species has determined that the Broom Crowberry Mitigation Plan (Appendix A of the EA) considered with the minor short-term impacts, will result in a net benefit to the state listed species of concern.

*Whether the actions threaten a violation of federal, state, or local environmental protection law:*

The Selected Alternatives do not violate any federal, state, or local environmental protection laws.

### **Determination of Impairment to Park Resources**

The NPS has determined that implementation of the selected alternatives will not constitute an impairment to the park's resources or values or violate the NPS Organic Act. This conclusion is based on a thorough analysis of the environmental impacts described in the EA, and the professional judgment of the decision-maker guided by the direction in *NPS Management Policies 2006*. It has been determined that there will be no impairment to park resources or values based on the following considerations. The projects are: a) necessary to fulfill specific purposes identified in the establishing legislation of the park; b) key to the natural and cultural integrity of the park or to opportunities for enjoyment of the park; and c) identified as a goal in the *General Management Plan* and other relevant NPS planning documents. Thus, there would be no impairment to park resources as a result of this project.

## FINDING OF NO SIGNIFICANT IMPACT

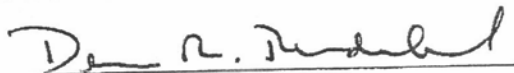
This Finding of No Significant Impact is based on the Environmental Assessment of the four Marconi Area Facility Improvements. The NPS has fully evaluated the information and analysis contained in the EA, and has considered comments received on the EA. Based on these considerations the NPS has determined the EA adequately and accurately addresses the environmental issues and impacts of the proposed projects. The NPS has fully evaluated the Alternatives, using the criteria of 40 C.F.R. § 1508.27 to determine the significance of the proposed actions by examining their context and intensity. On this basis, the NPS has determined that the Selected Alternatives do not constitute major Federal actions significantly affecting the quality of the human environment.

Based on the foregoing, it has been determined that an environmental impact statement (EIS) is not required, and therefore, will not be prepared.

  
George E. Price, Jr.  
Superintendent, Cape Cod National Seashore

6/18/08

Concurred:

 7/1/08  
Dennis R. Reidenbach  
Regional Director, Northeast Region

### References:

- Marconi Area Facilities Improvement EA, June 2008 (on file at CCNS)
- Compilation of public and interagency comments (on file at CCNS)