



National Park Service
U.S. Department of the Interior

Everglades National Park

**FINDING OF NO SIGNIFICANT IMPACT
MICCOSUKEE TRIBE OF INDIANS OF FLORIDA
OSCEOLA CAMP CURE PLAN**

Recommended:

Pedro Ramos, Superintendent,
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3/7/24
Date

Approved:

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Introduction

In compliance with the National Environmental Policy Act (NEPA), the National Park Service (NPS) prepared an Environmental Assessment (EA) to examine alternative actions and environmental impacts associated with the proposed improvements to the Osceola Camp (Camp) due to water levels in the area rising from implementation of the Central Everglades Planning Project (CEPP). The project is needed to avoid a safety hazard to the Camp residents and allow continued residential and commercial use of the site.

The statements and conclusions reached in this finding of no significant impact (FONSI) are based on documentation and analysis provided in the EA and associated decision file. To the extent necessary, relevant sections of the EA are incorporated by reference below.

Selected Alternative and Rationale for the Decision

Based on the analysis presented in Chapter 3 of the EA, the NPS selected Alternative B – Proposed Action/Preferred Alternative (Improvements) to raise the site elevations and facilities at the Camp.

The selected alternative will increase the site elevations at the Camp to allow for the implementation of components of the CEPP. The selected alternative will also preserve the Camp facilities and maintain the functions and public health of the residents of the Camp. The site elevation modifications will ensure that the Camp meets the higher elevation than the 100-year flood elevation of 10.0 ft. National Geodetic Vertical Datum (NGVD) [8.5 ft. North American Vertical Datum (NAVD)] which are based on the United States Army Corps of Engineers' (USACE) required elevations. In order to raise the elevations of the Camp, a total of approximately 18,500 cubic yards of fill will be required. Some of the existing structures at the Camp will be demolished and rebuilt, as they do not meet the required finish floor elevations. A total of 25 chickee huts will be reconstructed out of the traditional wood pole framing with a thatched roof. Fifteen storage structures will be demolished and rebuilt in new locations within the Camp. The demolished materials will be disposed of offsite.

The existing gravel and asphalt roads within the Camp will be removed and a new roadway will be constructed meeting the minimum elevation of 10.0 ft. NGVD. The onsite utilities will be replaced, and several trees will be relocated on site. No changes will be made to the residential structures as they meet the USACE required elevations with the exception of one structure that will be relocated to a new location within the Camp. In addition, the project will implement a number of resource protection measures to minimize the degree and/or severity of adverse effects on cultural resources; species of concern and wildlife; vegetation; wetlands; water quality and quantity; and human health and safety. See Chapter 2 of the EA (pages 8-14) and the errata (Appendix D) for more details.

Rationale for Decision

The proposed action was selected because it best meets the project purpose and need to:

- Implement the proposed improvements as identified in the CEPP.
- Preserve the existing facilities, functions and residences of the Camp to prevent the Camp from flooding as a result of the anticipated water levels rising from the CEPP.
- Avoid a safety hazard to the residents and provide continued residential and commercial use of the Camp.
- Align the NPS and Florida Department of Transportation's (FDOT) schedules to leverage construction resources.

Mitigation Measures

The NPS places a strong emphasis on avoiding, minimizing and mitigating potentially adverse impacts to resources, whether under the jurisdiction of the NPS or because of an NPS decision. To help ensure the protection of natural and cultural resources, the NPS will implement multiple mitigation measures and best management practices (BMPs) to protect the natural and cultural resources that the selected alternative could affect (see EA, Chapter 2, pages 11 – 14). These mitigation measures will allow the NPS to meet its conservation mandates as required by the NPS Organic Act (54 United States Code [U.S.C.] 100101 et seq.) and NPS Management Policies. The following mitigation measures and BMPs will be included for the selected alternative.

General Resource Management

- All resource protection measures will be clearly stated in the construction specifications, and workers will be instructed to avoid conducting activities outside the project area. Areas of natural or cultural resource concern will be clearly indicated on construction drawings.
- A preconstruction meeting will be held to inform contractors about sensitive areas and resources and provide procedures for identifying and addressing any unanticipated discoveries.
- Staging and storage areas for construction vehicles, equipment, materials, and soils will be sited in previously disturbed or paved areas approved by the park and tribes. These areas will be clearly identified in advance of construction.
- Any light fixtures that will be replaced will be dark-sky-friendly, and a lighting plan will be submitted should any night-time construction occur.
- Construction will only occur during daylight hours to reduce light pollution and to avoid night-time noise disruption.
- Standard noise abatement measures will be followed during construction and include a schedule that minimizes impacts on adjacent noise-sensitive resources, the use of best available noise control techniques wherever feasible, and the use of hydraulically or electrically powered tools when feasible.

- All permits will be acquired from the regulatory agencies prior to commencement of work.

Cultural Resources

- If cultural resources are discovered during project implementation all work in that area must stop and the Superintendent, Chief of Cultural Resources, and/or Park Archaeologist must be notified immediately in accordance with the 2008 National Park Service Programmatic Agreement Section VI.
- All activity must cease in the area of discovery and immediate notice made to the Superintendent and Chief of Cultural Resources if items protected by the Native American Graves Protection and Repatriation Act (NAGPRA) are discovered during project implementation. The Superintendent or Chief of Cultural Resources will notify the appropriate federally recognized Indian Tribes/Organizations and State Historic Preservation Officer (SHPO).
- A cultural resources monitor and/or fencing may be required for any work near archaeological and prehistoric/historic resources.

Floodplains

- Redevelopment activities will incorporate methods for minimizing storm damage in compliance with the National Flood Insurance Program's Floodplain Management Criteria for Flood Prone Areas (44 CFR 60.3) and Executive Order 11988, "Floodplain Management," and Director's Order #77-2, "Floodplain Management" identified in the WFSOF in Appendix C.
- Any proposed future development within the Camp will adhere to the ground elevations recommend by the USACE and through the park's coordination with the Tribes.
- Any proposed future development within the Camp will incorporate methods for minimizing flood damage, as contained in the National Flood Insurance Program Floodplain Management Criteria for Flood-Prone Areas (CFR 44, 60.3), and in accordance with any state or county requirements for flood-prone areas.

Wetlands

- Mitigation for unavoidable wetland impacts within the Camp will be offset through a compensatory mitigation plan which will be developed in accordance with FDEP's Section 404 permit process and Director's Order (D.O.) #77-1: Wetland Protection identified in the WFSOF in Appendix C.
- Pre-and post-construction erosion control BMPs will be implemented for drainage, erosion and sediment control to prevent or reduce runoff from entering the water column.
- Silt fencing or floating turbidity barriers will be installed around wetlands prior to construction to minimize impacts on wetland soils and vegetation from heavy equipment.
- Erosion and sediment control BMPs will be inspected and maintained on a regular basis and after each measurable rainfall to ensure they are functioning properly.

- Appropriate measures will be employed to prevent or control spills of fuels, lubricants, or other contaminants. Actions will be consistent with state water quality standards and Clean Water Act, Section 401 certification requirements.
- Heavy equipment hydraulic fluid lines will be filled with biodegradable hydraulic oil alternatives.

Vegetation

- Disturbed areas will be allowed to recover naturally to avoid or minimize the introduction or spread of non-native, invasive plant and animal species. If necessary, and in coordination with the park Biologist, any fill, mulch, reseeding, and sod material brought into the park must be free of non-native, invasive plants and animals, and noxious weeds.
- Special attention will be devoted to preventing the spread of invasive non-native plants. Standard measures will include the following elements: ensure that construction related equipment arrives on site free of mud or seed-bearing material; certify all seeds and straw material as weed-free; identify areas of invasive non-native plants before construction; treat non-native plants or infested topsoil before construction (i.e., topsoil segregation, storage, herbicide treatment); and revegetate with appropriate native species.
- All construction base, fill, and finish materials sourced from outside of the park will be acquired from a certified seed and weed-free source.

Species of Special Concern and Wildlife

- Implement the United States Fish and Wildlife Service (USFWS) Standard Protection Measures for the Eastern Indigo Snake during project construction.
- Conduct a Limited Roost Survey for the Florida bonneted bat and tricolored bat in the project area prior to construction to include a thorough inspection of the buildings that will be impacted by the proposed consolidation of those facilities. Document survey results and provide report to USFWS. If the Florida bonneted bat or tricolored bat is found to be roosting in structures identified for demolition, work will stop and consultation with USFWS will be reinitiated to determine next steps.
- Conduct any additional species-specific surveys required by the consultation with the USFWS.
- If listed species are present or observed at a proposed work location during construction, work will be postponed until individuals leave the area. Park Biologists and appropriate representatives from the Biological Resources Branch will be notified immediately of the time and location of the sighting(s) to determine if further mitigations are necessary.
- All work will only be conducted during daylight hours to minimize disturbance to wildlife.
- Staging and storage areas for construction vehicles, equipment, materials, and soils will be sited in previously disturbed or paved areas approved by the park and Tribes. These areas will be clearly identified in advance of construction.
- Adhere to all BMPs resulting from required regulatory permits.

- No living, injured, or dead listed species will be handled or removed from the site.
- BMPs, as listed in the USFWS Florida Bonneted Bat Consultation Guidelines (2019) will be implemented as determined through Section 7 consultation.

Water Quality and Quantity

- An Erosion and Sediment Control and Stormwater Pollution Prevention Plan (SWPPP) will be developed to comply with the current FDEP National Pollutant Discharge Elimination System (NPDES) requirements and a FDEP NPDES Construction General Permit coverage will be obtained. The SWPPP will be developed to address all stormwater management BMPs.
- Appropriate measures will be employed to prevent or control spills of fuels, lubricants, or other contaminants from wetlands. Actions will be consistent with state water quality standards and Clean Water Act, Section 401 certification requirements.
- The developed area will use techniques such as backsloping to allow percolation and filtration of runoff through the soils to avoid potential pollution of other surface waters by stormwater runoff contaminated by oil and other petroleum products.
- Pre-and post-construction erosion control BMPs for drainage, erosion and sediment control will be implemented to prevent or reduce runoff from entering the water column.
- Inspect and maintain erosion and sediment control BMPs on a regular basis and after each measurable rainfall to ensure they are functioning properly.
- Adhere to all BMPs resulting from required regulatory permits.

Human Health and Safety

- Tribal members and residents of the Camp will be informed in advance of and during construction activities through information provided by the NPS.
- Temporary short-term full closure of areas may be necessary on limited occasions. Such full closures will be for the minimal time required to complete the work activity.
- Construction fencing and closure signage will be placed around construction areas, as needed, to discourage residents from entering active construction areas.
- To mitigate potential risk to human health and safety, a flood response plan will be developed. The NPS will coordinate with the Tribe for completing a flood response plan as part of the Special Use Permit for occupation of the site.

Other Alternatives Considered

In addition to the selected alternative, this EA analyzed a no-action alternative. The no-action alternative was considered but ultimately not selected because the current conditions would remain, and it would not address the purpose and need of this project to provide a safe and continued use of the Camp.

Public Involvement & Agency Consultation

In November 2023, the park made the EA and draft Wetland and Floodplains Statement of Findings available for public review and comment for 30 days, from November 1st through November 30th. The park posted the documents on the NPS Planning Environment and Public Comment (PEPC) website and letters were sent to federal, state, local and tribal governments, stakeholders and other interested individuals and groups. Correspondence was received from the Nature Conservancy and unaffiliated individuals. The public comments did not result in the need for modifications to the selected alternative or changes to the EA. No public meetings were held for the project.

The NPS conducted a review of federally threatened and endangered species, and Critical Habitat, potentially occurring within the project area to determine if there are potential impacts to such species as a result of the proposed action. A Biological Assessment (BA) was prepared to evaluate and analyze the effects on federally listed species and their habitats related to the proposed actions including the modification of site elevations, wetland fill impacts, and tree removals. The BA describes the proposed action and has been prepared in accordance with Section 7 of the Endangered Species Act (ESA) of 1973, as amended (16 U.S.C. 1531 et seq.) and the NEPA (42 U.S.C. § 4332). In early consultation with the USFWS, the park submitted the BA that determined that the selected alternative will have no effect on the Cape Sable seaside sparrow, eastern black rail and Everglades/Florida bully, and may affect, but is not likely to adversely affect the American crocodile, Eastern indigo snake, Everglade snail kite, wood stork, Florida bonneted bat, tricolored bat and Florida panther. The USFWS concurred on January 26, 2024, with the park's effect determinations for threatened and endangered species impacts under the selected alternative.

NPS has consulted with the SHPO to assess effects and impacts to cultural resources by the proposed alternatives throughout the development of the EA. The NPS initiated a 30-day consultation response period with the Florida SHPO on October 20, 2023, to confirm that the proposed action would not adversely affect historic properties. The review was conducted in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and 36 CFR Part 800: Protection of Historic Properties. In a letter dated December 22, 2023, the SHPO concurred with the NPS that the proposed project will have no adverse effect on historic properties listed, or eligible for listing, in the National Register of Historic Places, or have any other historical, archaeological, or architectural value within the surveyed Area of Potential Effects.

Government to Government Consultations

Federally recognized tribes that are historically affiliated with the Camp or are interested in activities within the geographic region were contacted and invited to consult on all proposed undertakings that have a potential to affect properties of cultural, historical, or religious significance to the tribes. The NPS consulted with the following Native American tribal governments regarding the proposed action:

- Miccosukee Tribe of Indians of Florida,
- Seminole Tribe of Florida,
- Seminole Nation of Oklahoma.

Informal discussions and updates about this project with the above-mentioned tribes have been on-going. The NPS initiated formal consultations with the three tribes listed above on October 20, 2023. The Tribal Historic Preservation Office of the Miccosukee Tribe of Indians of Florida responded on December 21, 2023, with no concerns or comments for the project. The NPS did not receive a response from the Seminole Nation of Oklahoma or the Seminole Tribe of Florida within the allotted 30-day consultation period.

Finding of No Significant Impact

As described in the EA (pages 15-21), the selected alternative has the potential for adverse impacts on floodplains and wetlands as a result of construction activities; however, no potential for significant adverse impacts was identified. Anticipated impacts that will occur are summarized below.

Soil disruptions associated with construction activities may adversely affect the floodplain. Any erosion or sedimentation that might occur during construction will be temporary and will be minimized and mitigated through BMPs as indicated in the EA on pages 11 - 14. The floodplain currently functions to capture excess water from surrounding areas, which is especially important during storm events. Natural water movement within the floodplain has been diminished due to development in the Everglades, specifically the construction of the Camp and US-41/Tamiami Trail. The new structures and roadways at the Camp will be designed to be raised above the 100-year floodplain elevation to reduce the risk of flooding compared to the current conditions. Some of the existing structures are designed to be combined so they can be utilized for various uses. Therefore, raising only portions of the developed area within the Camp decreases the developed footprint which creates an increase in the floodplains capacity. Overall, when considering the greater floodplain area outside of the project area, the effects of the selected alternative on the floodplain will be minimal and the floodplain would likely continue to operate as it does currently.

The filling of select areas associated with construction activities will adversely affect wetlands and vegetation. However, the wetlands within the project area are of low quality and provide little benefits compared to the surrounding wetlands and the greater wetland area in the Everglades. The selected alternative will result in 4.1 acres of wetlands to be permanently or temporarily impacted from construction activities. Any temporary impacts to wetlands will be allowed to recover naturally to minimize the introduction or spread of non-native species. If fill, mulch and sod material is necessary, it will be free of invasive species. All permanent wetland impacts will be mitigated in accordance with NPS Director's Order #77-1, through the purchase of wetland mitigation credits as compensation. A final Wetland and Floodplains Statement of Findings was prepared and is included in Appendix C.

Conclusion

As described above, the selected alternative does not constitute an action meeting the criteria that normally requires preparation of an environmental impact statement (EIS). Based on the analysis provided in the EA, the selected action will not have a significant effect on the human environment in accordance with Section 102(2)(c) of NEPA.

Based on the foregoing, it has been determined that an EIS is not required for this project and, thus, will not be prepared.

The following appendices are included:

- Response to substantive public comments and NPS responses (Appendix A);
- Non-impairment determination (Appendix B);
- Signed Wetland and Floodplain Statement of Findings (Appendix C);
- Errata for the Miccosukee Tribe of Indians of Florida Osceola Camp Cure Plan (Appendix D).

Appendix A:
Response to Substantive Public Comments and NPS
Responses

Public Comments and Responses

The 30-day comment period for the EA occurred from November 1 to November 30, 2023. Four correspondences were received in PEPC. Of which, there were three substantive comments from those correspondences. Three (3) commenters were unaffiliated individuals from Florida and Utah. One (1) commenter was from the Nature Conservancy in Florida. These public comments and the NPS responses are summarized in the table below.

Corres.	Comments	NPS Response
1	Commenter had questions regarding how the process would be if the residents needed to temporarily move, or prepare their home for relocations.	The NPS is in constant communication with the residents of the Camp, and they are aware of the proposed improvements and relocation. Coordination with residents will continue throughout the implementation of the project to ensure residents are aware of potential impacts and relocations, if needed.
2	Commenter suggested that the elevations of the Camp be raised by four feet to take into account sea level rise predictions according to the National Oceanic and Atmospheric Administration's (NOAA) Sea Level Rise Report from 2022.	The project site for the proposed action is located inland. The existing ground surface elevations range from 7.3 ft. to 9.0 ft. NAVD and the existing finished floor elevations for the structures range from 7.9 ft. - 10.5 ft NAVD. The proposed action will raise the ground surface elevations to 8.5 ft. - 9.0 ft. NAVD and the finished floor elevations for the structures to approximately 9.5 ft. - 10.0 ft. NAVD. The project area is not affected by sea level rise based on the current and raised elevations.
3	Commenter expressed opposition for the proposed action and believes it is a short-term solution in the context of climate crisis and sea level rise.	The project site for the proposed action is located inland. As mentioned previously, the existing ground surface elevations range from 7.3 ft. to 9.0 ft. NAVD and the existing finished floor elevations for the structures range from 7.9 ft. to 10.5 ft NAVD. The proposed action will raise the ground surface elevations to 8.5 ft. NAVD and the finished floor elevations for the structures to approximately 9.5 ft. NAVD. The project area is not affected by sea level rise based on the current and raised elevations. The proposed action aligns with the Central Everglades Planning Project, which will increase water levels in the project area. The proposed action is needed now to prevent the Camp from flooding and displacing residents and their businesses.

Appendix B: Non-Impairment Determination

Non-Impairment Determination

Introduction

The National Park Service's (NPS) *2006 Management Policies* requires analysis of potential effects to determine whether or not actions will impair park resources. In order to manage and preserve national park lands, Congress passed the NPS Organic Act in 1916. The fundamental purpose of the national park system, established by the Organic Act, begins with a mandate to conserve park resources and values. The Organic Act established the NPS as an agency under the discretion of the Secretary of the Interior with the stated purpose of promoting use of national park lands while protecting them from impairment. Sections 1.4.5 and 1.4.6 of the *2006 Management Policies* provide an explanation of impairment as "an impact, that in the professional judgement of the responsible NPS manager, would harm the integrity of park resources and values, including the opportunities that otherwise would be present for the enjoyment of those resources and values." As stated in Section 1.4.5, an impact to any park resource or value may, but does not necessarily, constitute an impairment. An impact would be more likely to constitute an impairment to the extent that it affects a resource or value whose conservation is:

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park; or
- key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or
- identified in the park's general management plan or other relevant NPS planning documents as being of significance.

An impact will be less likely to constitute an impairment if it is an unavoidable result of an action necessary to pursue or restore the integrity of park resources or values and it cannot be further mitigated. Section 1.4.6 of the *2006 Management Policies* identifies the park resources and values that are subject to the no-impairment standard:

- the park's scenery, natural and historic objects, and wildlife, and the processes and condition that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archaeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structures, and objects; museum collections; and native plants and animals.
- appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;
- the park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and
- any additional attributes encompassed by the specific values and purposes for which the park was established.

Non-impairment Determination for the Selected Alternative

This determination on impairment has been prepared for the NPS selected alternative, Alternative B, described in the Finding of No Significant Impact (FONSI) and in the Miccosukee Tribe of Indians of Florida Osceola Camp Cure Plan Environmental Assessment (EA). The significance of each resource based on the park's enabling legislation is discussed in the sections below. The resource impact topics carried forward and analyzed for the selected alternative in the EA and for which an impairment determination is made are floodplains and wetlands and vegetation. Each resource or value for which impairment is assessed and the reasons why impairment will not occur is described below.

Floodplains

The project area is within special flood hazard area, Zona A, according to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps. Zone A floodplains are defined as areas with a 1 percent annual chance of flooding. Natural water movement within the floodplain has been diminished due to development within the Everglades, specifically at Osceola Camp (Camp) and the Tamiami Trail roadway. The Camp experiences minor flooding and standing water in low-lying areas during storms and rain events. Previously, fill has been brought into the Camp to help mitigate flooding. The Central Everglades Planning Project (CEPP) will increase the amount of water being delivered in proximity to the Camp, which will in turn restore the floodplain's natural functions and flow patterns. The selected alternative will involve construction activities in an area that has previously been altered with the addition of fill, impermeable surfaces and structures. Reconstruction of the site will involve elevating the structures and roadways minimizing the impacts of flooding on human safety and loss of structures. Additionally, since the reconstruction of some of chickee huts are designed to be combined for multiple uses, raising only portions of the grounds within the developed areas creates the potential for an increase in floodplain storage capacity within the Camp. The selected alternative will include a stormwater management system to discharge runoff. Soil disturbance will be limited to construction activities and the use of best management practices (BMPs) will be implemented to contain disturbance within the construction area. Because soil disturbance will be limited and the redesign of the chickees and the site will help with floodplain capacity, there will be no impairment to floodplains under the selected alternative.

Wetlands and Vegetation

The Everglades is a unique subtropical wetland that serves a connection between central Florida's freshwater ecosystem and the marine systems of the Gulf of Mexico and Florida Bay. Due to development, wetlands and vegetation in Everglades National Park has drastically changed or no longer exists in some areas. Mixed wetland hardwoods make up the majority of wetlands within the project area. The selected alternative will involve the placement of fill in wetlands within the project area in order to elevate the Camp. Elevating the Camp structures above surface water levels will minimize the impacts of runoff from the Camp into surrounding wetlands. The wetlands and vegetation within the project area are of low quality and provide little environmental benefits compared to the wetlands surrounding the project area. BMPs will be implemented to avoid and minimize any secondary impacts to adjacent wetlands. Wetland

impacts will be mitigated through compensatory mitigation at Hole-In-The-Donut Mitigation Bank or similar mitigation bank site within Everglades National Park and is consistent with Director's Orders #77-1 *Wetland Protection*. Therefore, there will be no net loss of wetlands and no impairment to wetlands.

Conclusion

The NPS has determined that implementation of the selected alternative will not constitute impairment of the resources or values of the park. The impact analyses summarized above indicate that the selected alternative will not result in impairment to the extent that it affects a resource or value whose conservation is, 1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, 2) key to the natural or cultural integrity for the park or to opportunities for enjoyment of the park, or 3) identified in the park's general management plan or other relevant NPS planning documents as being of significance. This conclusion is based on consideration of the park's purpose and significance, a thorough analysis of the environmental impacts described in the EA, comments provided by the public, and the professional judgement of the decision maker guided by direction of the *2006 Management Policies*.

Appendix C:
Signed Wetland and Floodplains Statement of Findings

**UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE**

**Miccosukee Tribe of Indians of Florida Osceola Camp Cure Plan
Wetland and Floodplain Statement of Findings (WFSOF)**

Everglades National Park

**Prepared in Accordance with Director's Order 77-1 Wetlands Protection and 77-2
Floodplain Management and their respective handbooks.**

February 2024

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	F. Ed Harvey, Chief, Water Resources Division	Date
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	Mark A. Foust, Regional Director, Interior Region 2, National Park Service	Date

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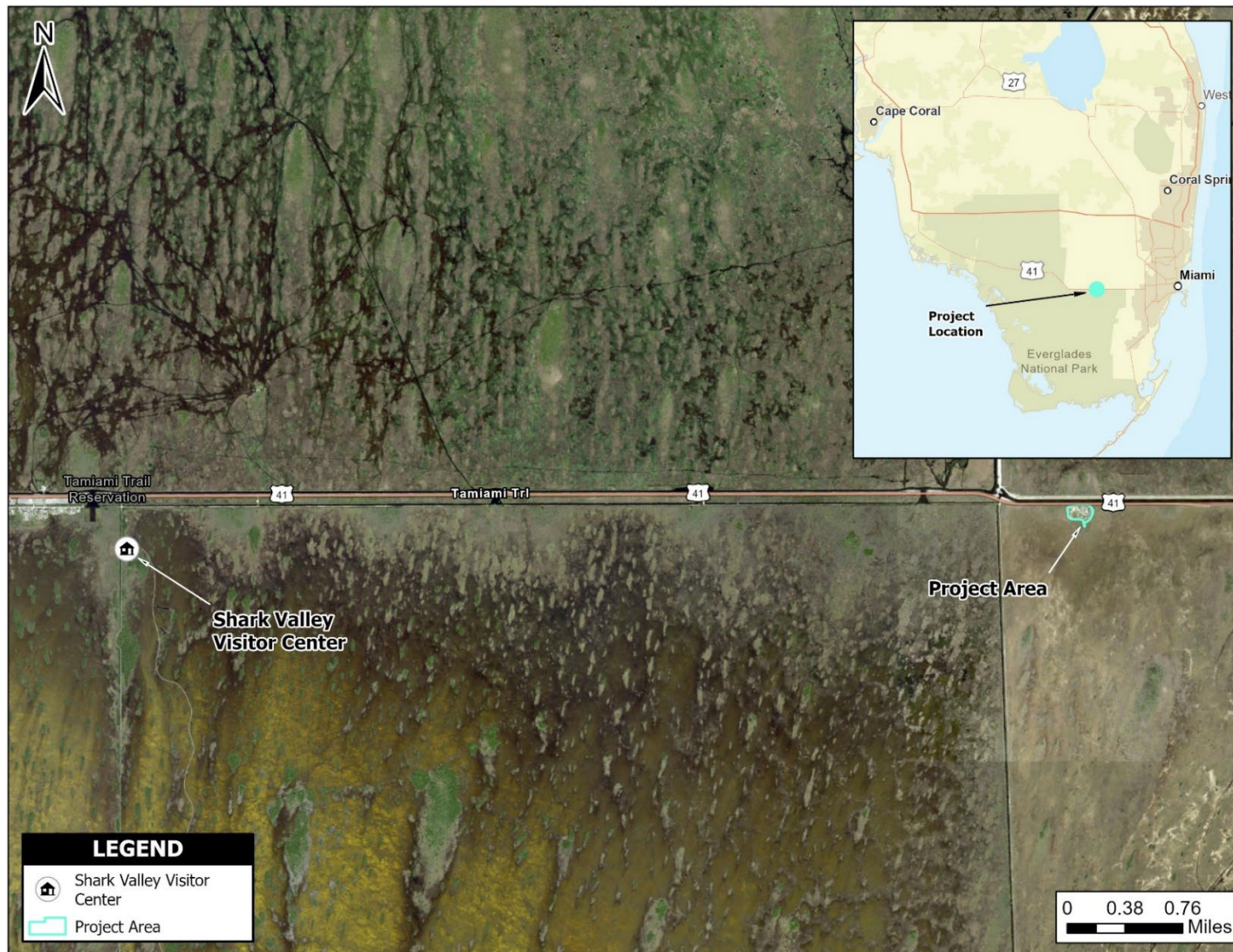
INTRODUCTION

The National Park Service (NPS) is proposing improvements to the Miccosukee Tribe of Indians of Florida Osceola Camp (Camp) due to water levels in the area rising from the Central Everglades Planning Project (CEPP), a component of the Comprehensive Everglades Restoration Plan (CERP). The Camp is in Everglades National Park (Everglades NP or “the park”) along US-41/Tamiami Trail in Miami-Dade County, Florida (**Figure 1**). The Project Area includes the manmade structures within the Camp as well as the associated wetlands within the limits of disturbance. The Project Area is located downstream of one of the CERP project flow ways and the Camp’s current ground surface elevation, select structures, roadways and driveways must be elevated to provide appropriate levels of flood protection to the Camp before the water levels can be raised as part of the CERP. The site plan to modify the site elevations to accommodate the CEPP is referred to as the Cure Plan for the Camp. The NPS and Miccosukee Tribe (Tribe) have worked together to develop a Cure Plan, or site plan, to allow for the progression of the CEPP while preserving the Camp facilities, functions, and public health of the residents.

To preserve the environmental integrity of both wetland and floodplains, NPS has established Director’s Order (DO) 77-1: *Wetland Protection* and Director’s Order 77-2: *Floodplain Management*. These orders were established to comply with Executive Order 11990: *Protection of Wetlands*, Executive Order 11988 *Floodplain Management* and Executive Order 13690 *Establishing a Federal Flood Risk Management Standard and a Process for Further Soliciting and Considering Stakeholder Input*. The purpose of these executive orders is to avoid impacts, to the extent possible, to both wetlands and floodplains. Procedural Manual 77-1: *Wetland Protection* (NPS 2016) and Procedural Manual 77- 2: *Floodplain Management* (NPS 2002) outline the procedures and policies for the NPS to comply with the executive orders. Guidance for the Federal Flood Risk Management Standard is described in Executive Order 13690 and the associated implementation guidelines.

This Wetland and Floodplain Statement of Findings (WFSOF) was prepared per Director’s Order 77-1: *Wetland Protection* and Director’s Order 77-2: *Floodplain Management* for the proposed Miccosukee Tribe of Florida Osceola Camp Cure Plan and documents compliance with the NPS wetland protection and floodplain management procedures. The NPS has completed a WFSOF because the proposed project would occur within the 100-year floodplain and would result in a loss of wetlands within Everglades NP.

Figure 1 Project Vicinity



PROPOSED ACTION

The NPS proposed action and the preferred alternative would increase the site elevations at the Camp to allow for the implementation of the components of the CEPP while also preserving the Camp facilities, in addition to maintaining the functions, and public health of the residents. The proposed action includes raising the base elevations of structures within the Camp outside of the predicted future 100-year flood zone as per the CEPP which incorporated climate change scenarios and future forecasting for water level rise in the Project Area. In addition, the elevations proposed have included tribal input and concurrence.

The site generally consists of filled areas of paved/unpaved gravel areas and green areas composed of vegetation, grass, and bare dirt. The general ground surface would be elevated by removing the top three inches of the organic surface materials prior to placing and compacting the fill. The fill from the demolition of Old Tamiami Trail from the Florida Department of Transportation's Tamiami Trail Next Steps roadway project would be utilized for the site elevations. The fill material would be transported to the property and used to raise the elevation of each structure by placing it on a new slab on top of the fill material. A total of 18,500 cubic yards of fill would be required for the improvements. The fill is currently stockpiled 0.75 mile away from the Camp and would be used as needed to fill the areas to be raised. Stockpiling would not occur in wetlands or floodplains.

Twenty-five chickee hut structures (huts) would be demolished as they do not meet the required finished floor elevations. Once the structures are demolished, the debris would be removed and transported to the nearest landfill for that type of material. The grade would be elevated at the sites for the new huts to meet the minimum CERP guidelines of 11.0 ft. NGVD for non-residential structures, and time allowed for the Tribe to rebuild the huts prior to construction continuing. The huts would be reconstructed out of the traditional wood pole framing with a thatched roof. Fifteen storage structures would be demolished, disposed offsite, and rebuilt in their new locations.

Approximately 17,000 square feet (sf.) of the gravel road, 1,700 sf. of asphalt pavement and 4,000 sf. of asphalt walkway would be removed and disposed offsite. The new roadway would be comprised of 35,349 sf. of asphalt pavement and would meet the minimum elevation of 10.0 ft. NGVD. All residences would have concrete parking pads, approximately 21 total, constructed throughout the Project Area (3 for each residential house).

Approximately 450 linear feet (lf.) of the existing wood fence, including the gate and posts to enter the Camp, would be demolished and disposed of offsite, and replaced with 450 lf. of 8 ft. concrete masonry unit fence and new gates and posts. As a result of the site elevations, select trees would require relocation. However, many of the trees that require relocation are in poor condition and would need to be removed. Several coconut palms (*Cocos nucifera*), sabal palms (*Sabal palmetto*), a loquat (*Eriobotrya japonica*), slash pines (*Pinus elliotii*), and lemon trees (*Citrus limon*) would be relocated.

The utilities on site would be replaced. New water piping would be installed to the eight residences, the central washing station and the restroom facility. Due to the State of Florida Department of

Health, Chapter 64E-6, Florida Administrative Code Standards for Onsite Sewage Treatment and Disposal Systems, effective July 18, 2018, the septic system would be replaced with a new system to service the residences and restroom. The electrical power supply from offsite would remain as is. The telecommunications services would need to be raised. There is no utility work or connections proposed within the public right-of-way as the telecommunications service boxes would be remounted to existing onsite utility poles at higher elevations. With the exception of one residential housing structure that would be relocated to a new elevated location within the Project Area, no changes would be made to the residential structures as they currently meet the required United States Army Corps of Engineers (USACE's) criteria; however, the electrical connection, generator connection, water line and sewer connections require relocation or elevation to prevent inundation.

The above-described proposed action will fall under a Class I Action of the NPS DO 77-2. This Action Class is defined as follows (NPS 2007) "Class I Actions include location or construction of administrative, residential, warehouse, and maintenance buildings; non-excepted parking lots; or other manmade features which by their nature entice or require individuals to occupy the site, are prone to flood damage, or result in impacts to natural floodplain values. Class I Actions are subject to the floodplain policies and procedures if they lie within the 100-year floodplain (the Base Floodplain)." As the Project is within a 100-year floodplain (further described later in this analysis) and due to requirements under Class I Actions, project modifications would ensure that elevations within the Project Area are above the projected 100-year flood elevation of 10.0 feet (ft) NGVD (National Geodetic Vertical Datum [NGVD]) (8.5 ft North American Vertical Datum [NAVD]). The Camp facilities would be raised based on the USACE minimum required elevations. Through the park's coordination with the Tribes, the Camp facilities would be raised as follows:

- 10.0 – 10.5 ft NGVD (8.5 – 9.0 ft NAVD) for ground surface elevations
- 11.0 – 11.5 ft NGVD (9.5 – 10.0 ft NAVD) for finished floor elevations of non-residential structures
- 11.1 – 11.4 ft NGVD (9.6 – 9.9 ft NAVD) for finished floor elevations of residential structures

Requirements surrounding floodplain resources are further detailed in subsequent sections.

BACKGROUND AND CURRENT CONDITIONS

The Camp appears to have been constructed in a low area that was raised with fill material. The Camp was established by William and Alice McKinley Osceola in 1935. The Camp served as a family residence and gift shop and then later a site for air boat rides after the opening of US-41/Tamiami Trail brought tourists into the Everglades. In 1936, the Camp was home to 15-25 Tribal residents and contained a large store with groceries and goods made by Native American Tribes. Today, there are no intact historic buildings at the Camp. Recently, fill material was placed by the present residents, descendants of William McKinley Osceola, to further expand and elevate the Camp and its buildings so they will not be flooded by rising water levels.

The Camp is an approximate 9.4-acre residential village within Everglades NP, as previously illustrated in Figure 1. The Camp is located approximately 11.4 miles west of the intersection of US 41/Tamiami Trail and CR 997/Krome Avenue and 6.7 miles east of the Shark Valley Visitor Center. The approximate central coordinates for the entrance to the Camp is 25° 45' 38.8" N.; 80° 39' 53.8" W. The structures/facilities at the Camp include eight residential housing structures; 25 huts; 15 storage structures; four generators, pads and structures; three water supply systems, pads and structures; roadways and driveways and wastewater treatment systems. All of the aforementioned structures/facilities would be impacted, with the exception of the residential housing structures, four of the storage structures, the generator structures and the water supply structures.

Wetlands

To gain a better understanding of current conditions of wetlands and waterways within the Project Area, a desktop review of the National Wetland Inventory (NWI) database and the National Hydrology Dataset (NHD) was performed (USFWS 2023, USGS 2023). These resources report two wetlands (totaling 9.1 acres) and no waterbodies within the Project Area. One wetland is classified as a freshwater emergent wetland (PEM5C) and comprises 5.8 acres within the Project Area. The other wetland is classified as a freshwater forested/shrub wetland (PSS/1C) and comprises 3.3 acres within the Project Area. **Figure 2** illustrates NWI and NHD features within the Project Area.

An in-situ delineation of wetlands within the Project Area was completed in 2007 by the NPS. The GIS data from the 2007 delineation provides a baseline of the historical wetlands in proximity to the Project Area.

During the preparation of the Cure Plan in 2021, an updated wetland delineation was performed. After this delineation occurred, it was discovered that previous filling of wetlands had occurred within the Project Area by the residents to elevate the Camp and its buildings to combat rising water levels. This resulted in a net loss of wetlands that were not immediately evaluated. The report identified 1.3 acres of wetland adjacent to the Camp that would be impacted due to filling to preserve the Camp. However, because the previous filling was not immediately accounted for, this number cannot be considered accurate.

In 2023 updated field surveys of the Project Area were performed. These field surveys compared the wetland boundary identified in 2007 with the current limit of disturbance. The goal of these field

surveys was to further characterize the areas of previous fill, as well as the areas of proposed fill in accordance with the Cure Plan to more accurately determine overall impacts to the existing wetlands. Field teams confirmed two wetlands within the Project Area comprising 1.4 acres, as documented during the 2021 field surveys. When comparing the 2007 wetland delineation with the 2023 wetland delineation, it was found that 2.6 acres of wetlands within the Project Area had been filled between 2007 and 2023. In addition, there is a 0.1-acre strip of land south of the Project Area that has also been filled. This strip of land is not included in the current Project Area; however, this land is taken into consideration when calculating compensatory mitigation to comply with NPS Director's Order 77-1 and Clean Water Act (CWA) requirements. Therefore, the total area of wetlands that were filled between 2007 and 2023 is 2.7 acres. The areas of previous fill are illustrated in **Figure 3**. The Project Area, including both the previous fill areas and proposed fill areas, can be seen in **Figure 4**.

Figure 2 NWI Features within the Project Area

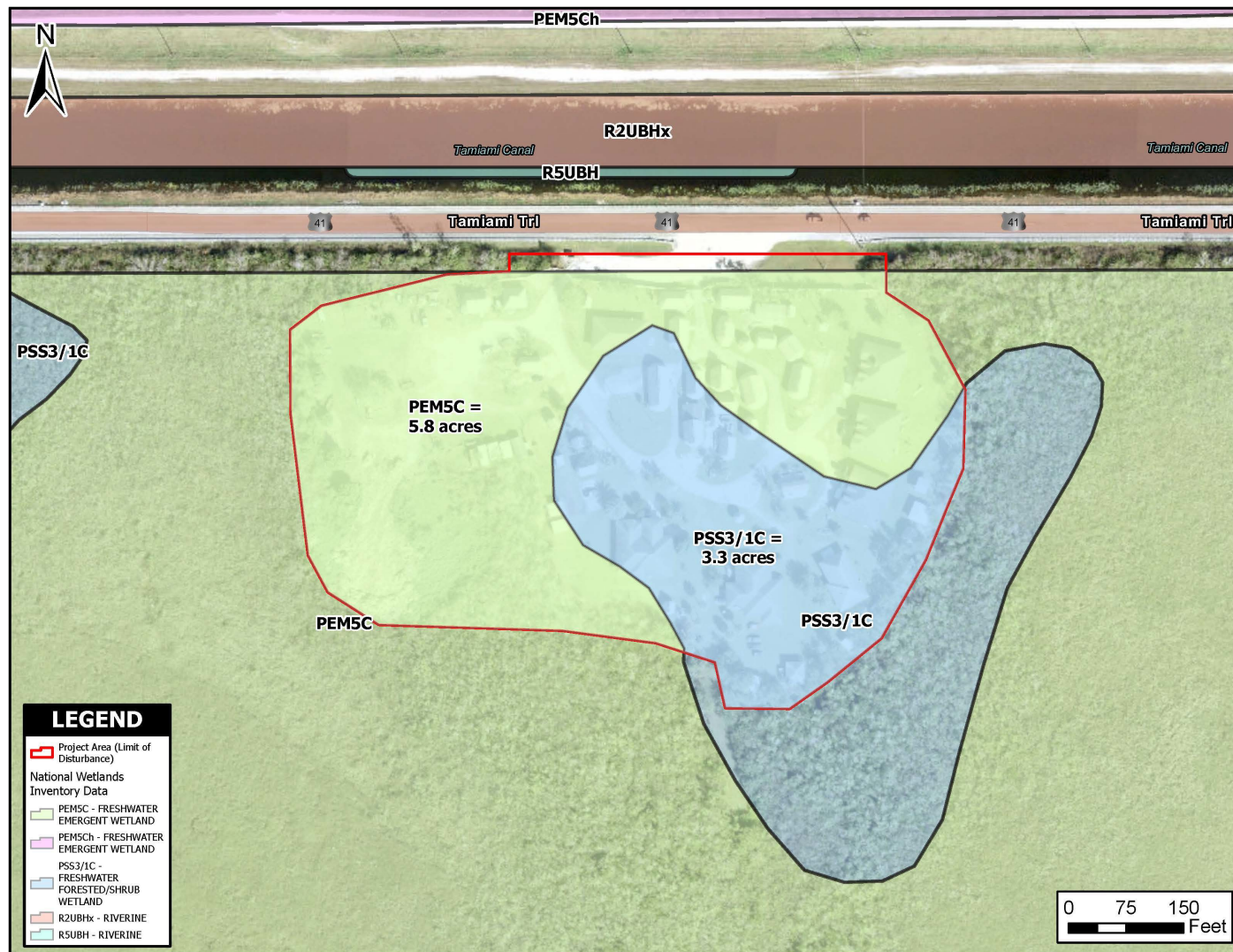


Figure 3 **Previous Fill within the Project Area**

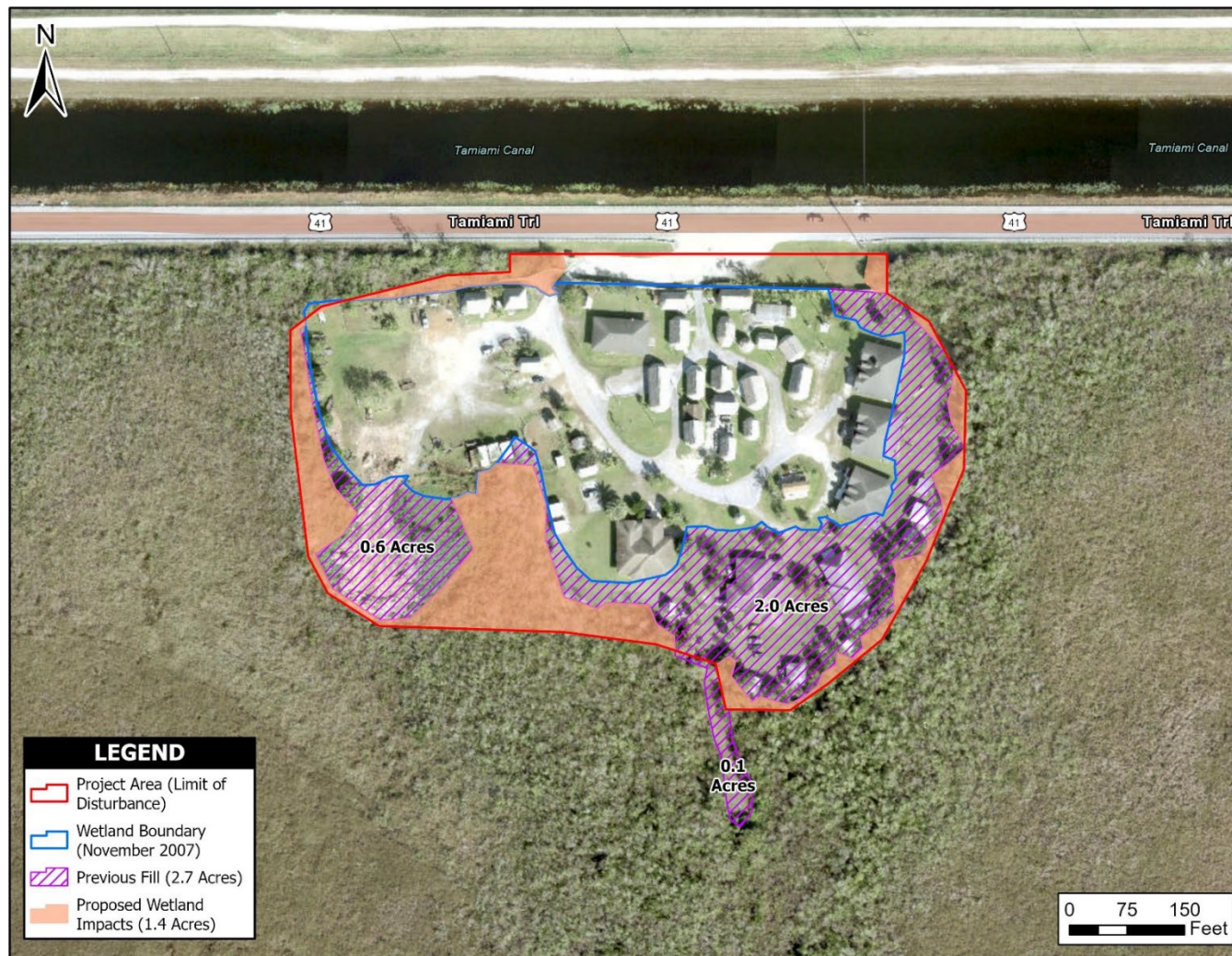


Figure 4 Delineated Wetland and Water Features within the Project Area

Vegetation and Habitat

The Project Area is surrounded on the eastern, western, and southern sides by wetlands within Everglades NP. Adjacent wetlands are primarily forested with mixed-shrub and emergent species. Vegetation within adjacent wetlands include pond apple (*Annona glabra*), Carolina willow (*Salix caroliniana*), swamp bay (*Persea palustris*), dahoon holly (*Ilex cassine*), wax myrtle (*Myrica cerifera*), myrsine (*Rapanea punctata*), giant leather fern (*Acrostichum danaeifolium*), strangler fig (*Ficus aurea*), salt bush (*Baccharis halimifolia*) and cocoplum (*Chrysobalanus icaco*). Within the Project Area, habitat consists mostly of mowed grass with sporadic trees such as coconut palms (*Cocos nucifera*) and sabal palms (*Sabal palmetto*).

FDOT's Florida Land Use, Cover and Forms Classification System (FLUCCS) identifies three types of land cover within the Project Area. A breakdown of the types of land cover within the Project Area are included in **Table 1** and illustrated in **Figure 5** below.

Table 1 FLUCCS Categories within the Project Area

FLUCCS Code	Description	Acreage
1400	Commercial and Services	7.9
6170	Mixed Wetland Hardwoods	1.3
6410	Freshwater marches/Graminoid Prairie – Marsh	0.2
Total		9.4 ¹

¹Any negligible difference in totals is due to rounding of raw data.

FLUCCS categories are defined in the FDOT (1999) handbook as follows:

- Commercial and Services (1400).** Commercial areas are predominantly associated with the distribution of products and services. This category is composed of a large number of individual types of commercial land uses which often occur in complex mixtures. The Commercial and Services category includes all secondary structures associated with an enterprise in addition to the main building and integral areas assigned to support the base unit. Included are sheds, warehouses, office buildings, driveways, parking lots and landscaped areas. Other types of Commercial areas include shopping centers and commercial strip developments. These areas have distinctive patterns which are readily identifiable on aerial photographs. Frequently, individual houses and other classes of urban land use may be found within commercial areas. Such uses normally are not delineated unless they can be plotted into polygons of at least one acre size at Level III. Otherwise, the Mixed category should be used. Commercial use which cannot be easily identified on aerial photography is the commercial resort. These businesses cater to vacationing patrons and often contain associated recreational facilities such as swimming pools and ball courts.
- Mixed Wetland Hardwoods (6170).** This category describes the forested wetland hardwood communities in the adjacent Everglades wetlands which are composed of a large variety of hardwood species tolerant of hydric conditions where no species is dominant. Species present include red maple (*Acer rubrum*), willow (*Salix caroliniana*), cypress (*Taxodium distichum*), pond apple, pond ash (*Fraxinus caroliniana*) and dahoon holly.

- **Freshwater marshes/Graminoid Prairie – Marsh (6410).** The communities included in this category are characterized by having a vegetative community dominated by herbaceous species where one or more of the following species predominate: sawgrass (*Cladium spp.*), cattail (*Typha spp.*), arrowhead (*Syngonium podophyllum*), maidencane (*Panicum hemitomon*), buttonbush (*Cephalanthus occidentalis*), cordgrass (*Sporobolus spp.*), giant cutgrass (*Zizaniopsis miliacea*), switchgrass (*Panicum virgatum*), bulrush (*Scirpus spp.*), needlerush (*Juncus roemerianus*), common reed (*Phragmites australis*), and/or arrowroot (*Maranta arundinacea*).

During 2023 field surveys, the desktop review of FLUCCS land use types were verified. The majority of wetlands in the Project Area were classified as mixed wetland hardwoods, which is consistent with the FLUCCS data. However, two examples of differing field conditions were observed. Firstly, the area to the east of the Project Area was identified as freshwater marsh habitat by FLUCCS but was deemed to be mixed wetland hardwoods in the field. Secondly, there was a small portion on the north end of the Project Area that was identified as Commercial and Services in the FLUCCS data but was determined to be roadside ditch wetland habitat based on field observations.

Figure 5 FLUCCS Land Cover



Soils

The United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey of Miami-Dade County, Florida indicated two soil types within the Project Area (USDA NRCS 2019). A breakdown of the soil types found within the Project Area are included in **Table 2** below and illustrated in **Figure 6**. Of the two mapped soil series, both are classified as predominately hydric (a hydric soil rating of 67 to 100) or partially hydric (a hydric soil rating of 1 to ≤ 66) by the NRCS.

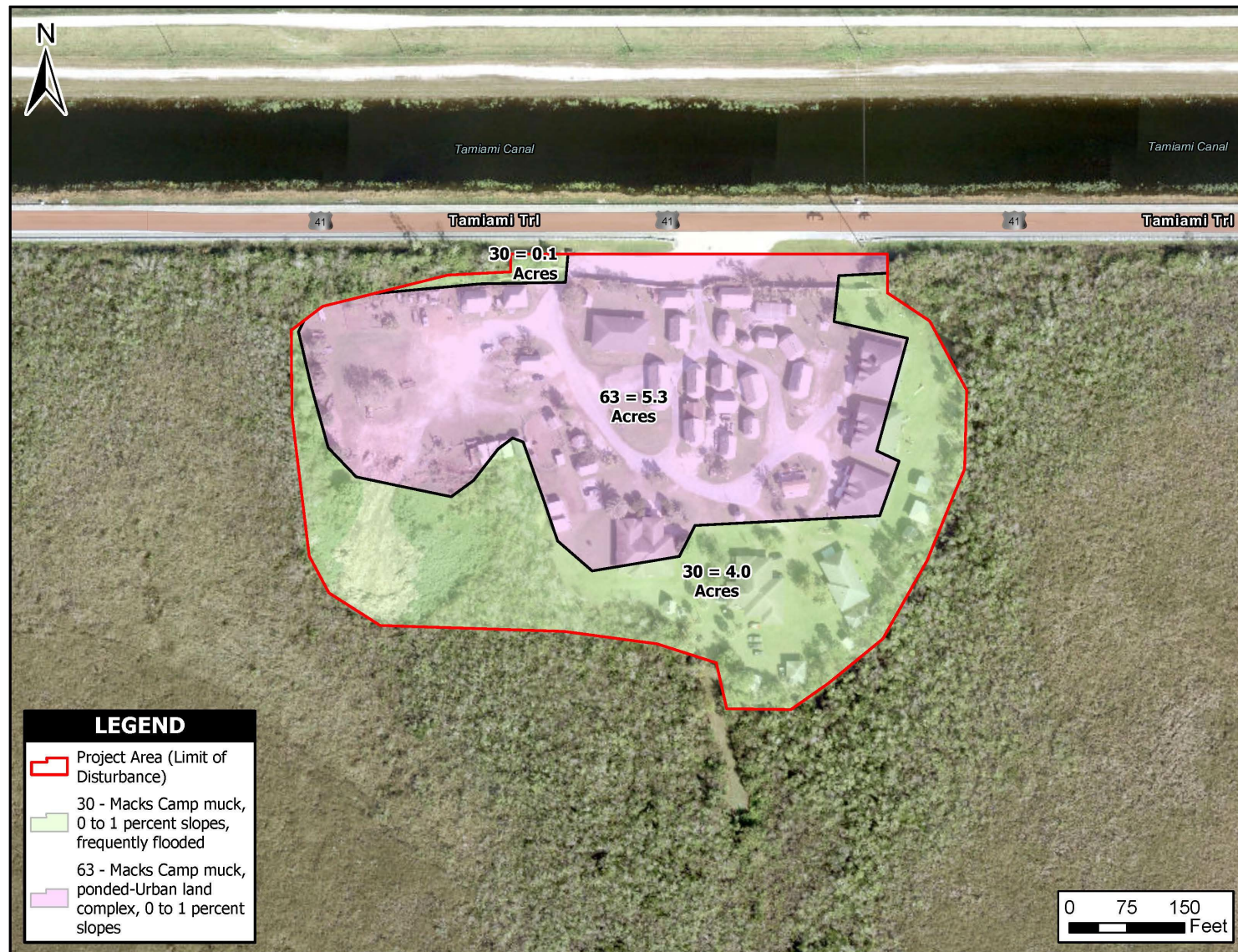
Table 2 Soil Types within the Project Area

Map Unit Symbol	Soil Series Name	Hydric Soil Rating	Area (acres)	Percent of Total Project Area
30	Macks Camp muck, 0 to 1 percent slopes, frequently flooded	Hydric	4.1	43.6
63	Macks Camp muck, ponded-Urban land complex, 0 to 1 percent slopes	Partially Hydric	5.3	56.4
Total			9.4 ¹	100 ¹

¹Any negligible difference in totals is due to rounding of raw data.

Soil series are defined by USDA NRCS (2023) as follows:

- Macks Camp muck, 0 to 1 percent slopes, frequently flooded (30).** This component is on saw grass marshes on marine terraces on coastal plains. The parent material consists of herbaceous organic material over limestone. Depth to a root restrictive layer, bedrock, lithic, is 39 to 59 inches. The natural drainage class is very poorly drained. Water movement in the most restrictive layer is high. Available water to a depth of 60 inches (or restricted depth) is very high. Shrink-swell potential is low. This soil is frequently flooded. It is not ponded. A seasonal zone of water saturation is at 0 inches during January, June, July, August, September, October, November, December. Organic matter content in the surface horizon is about 75 percent. Non-irrigated land capability classification is 7w. This soil meets hydric criteria. There are no saline horizons within 30 inches of the soil surface. The soil has a maximum sodium adsorption ratio of 1 within 30 inches of the soil surface.
- Macks Camp muck, ponded-Urban land complex, 0 to 1 percent slopes (63).** The parent material consists of herbaceous organic material over limestone. Depth to a root restrictive layer, bedrock, lithic, is 36 to 51 inches. The natural drainage class is very poorly drained. Water movement in the most restrictive layer is high. Available water to a depth of 60 inches (or restricted depth) is very high. Shrink-swell potential is low. This soil is not flooded. It is frequently ponded. A seasonal zone of water saturation is at three inches during January, February, March, June, July, August, September, October, November, December. Organic matter content in the surface horizon is about 75 percent. Non-irrigated land capability classification is 7w. This soil meets hydric criteria. There are no saline horizons within 30 inches of the soil surface. The soil has a maximum sodium adsorption ratio of 1 within 30 inches of the soil surface.

Figure 6 NRCS Soils

Functions and Values

During 2023 site visits, wetland functions and values were assessed via the Uniform Mitigation Assessment Method (UMAM) (**Appendix A**). This method was established to fulfill the mandate of subsection 373.414(18), F.S., which requires the establishment of a UMAM to evaluate proposed wetland impacts and determine the appropriate amount of mitigation needed to offset adverse impacts to wetlands and other surface waters and their loss of function. This mitigation evaluation method was also used to calculate the appropriate number of mitigation bank credits (Florida Department of Environmental Protection [FDEP] 2022). Scoring within each UMAM category can be subdivided based on the quality of each feature within the given wetland. Features that score a 0 are deemed insufficient to provide wetland/surface water functions. Features that score between 0 and 4 are deemed to have a minimal level of support of wetland/surface water functions. Features that score between 4 and 7 are sufficient to maintain most wetland/surface water features. Features that score between 7 and 10 are optimal and fully support wetland/surface water features. The overall score is an average of each category and thus, a score closer to 1.0 is the most optimal score.

After the 2023 site visit, it was determined that the wetland identified as “US 41 roadside ditch wetland” (as illustrated on **Figure 4**), is approximately 0.2 acres. After reviewing UMAM forms, biologists concluded that this wetland received a UMAM composite score of 2 out of 10 (2/10) for location and landscape support, 3/10 for water environment, and 3/10 for community structure. This gave the wetland an overall UMAM score of 0.3 (as methodology requires adding up all values and dividing by 30 for an overall score). Based on this assessment, the US-41/Tamiami Trail roadside ditch wetland has been given a “low” functional quality rating. The second wetland, “Everglades perimeter wetland” (as illustrated on **Figure 4**), is approximately 3.9 acres. This wetland has a UMAM composite score of 7/10 for location and landscape support, 7/10 for water environment, and 7/10 for community structure. This gave the wetland an overall UMAM score of 0.7. Based on this assessment, the Everglades perimeter wetland has been given a “medium” functional quality rating. It is of note that 0.1 acres of this wetland falls outside the Project Area.

As described on the UMAM forms (**Appendix A**), the delineated wetlands function to capture untreated runoff from the Camp as well as from US-41/Tamiami Trail via roadside ditches. Similarly, numerous animal species such as fish, freshwater invertebrates, and aquatic reptiles and amphibians were noted as likely to utilize the wetlands habitat. The wetlands were also described as having the potential to provide foraging habitat for wading birds. See the Wetland Mitigation section below for details regarding UMAM credits required for this project.

Floodplains

The Project Area falls within the Everglades sub-basin which is within hydrologic unit code (HUC) 8 #03090202 (**Figure 7**; USGS 2020). A desktop review of the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs) indicates that the entirety of the Project Area is within special flood hazard area, Zone A (**Figure 8**; FEMA 2009). Zone A floodplains are defined as areas with a 1 percent annual chance of flooding (i.e., located within the 100-year floodplain).

The floodplain currently functions to capture excess water from surrounding areas. This function is especially important during storm events and hurricanes. Historically, natural water movement within the floodplain has been diminished due to development within the Everglades, more specifically the Camp and the US-41/Tamiami Trail roadway. Structures within the Project Area that are currently impacting the floodplain include: 8 residential housing structures; 25 huts; 15 storage structures; 4 generator pads; and 3 potable water-well systems as well as an 8-ft-tall wooden fence at the entrance of the Camp. There are also paved roadways within the Project Area including parking pads and driveways. In addition to impacts from manmade structures, the floodplain is anticipated to be impacted by climate change and rising sea levels. Further impacts from the structures within the Project Area would be minimized through the implementation of the preferred alternative action. This would in turn enhance floodplain resiliency and thus minimize the potential impacts to human safety.

As previously described, the proposed action is considered a Class I Action per NPS Procedural Manual 77-2: *Floodplain Management* (NPS 2007). Project activities within the floodplain are also governed by EO 13690 which established a Federal Flood Risk Management Standard (FFRMS). These standards were implemented to enhance the nation's resilience to flooding as well as ensure that newly constructed infrastructure remains functional for its intended lifespan. The FFRMS mandates that federal agencies choose one of three methods to establish higher vertical flood elevations beyond the guidelines in EO 11988. The three methods available are Climate Informed Science Approach, Freeboard Value Approach, and the 500-year floodplain (FEMA 2022). As part of the CERP, the USACE calculated the recommended design elevations which this project has adopted. This most closely follows the Climate Informed Science Approach. Methods the USACE used to determine elevations can be found in the Cure Plan (NPS 2021).

Figure 7 Watershed HUC-8

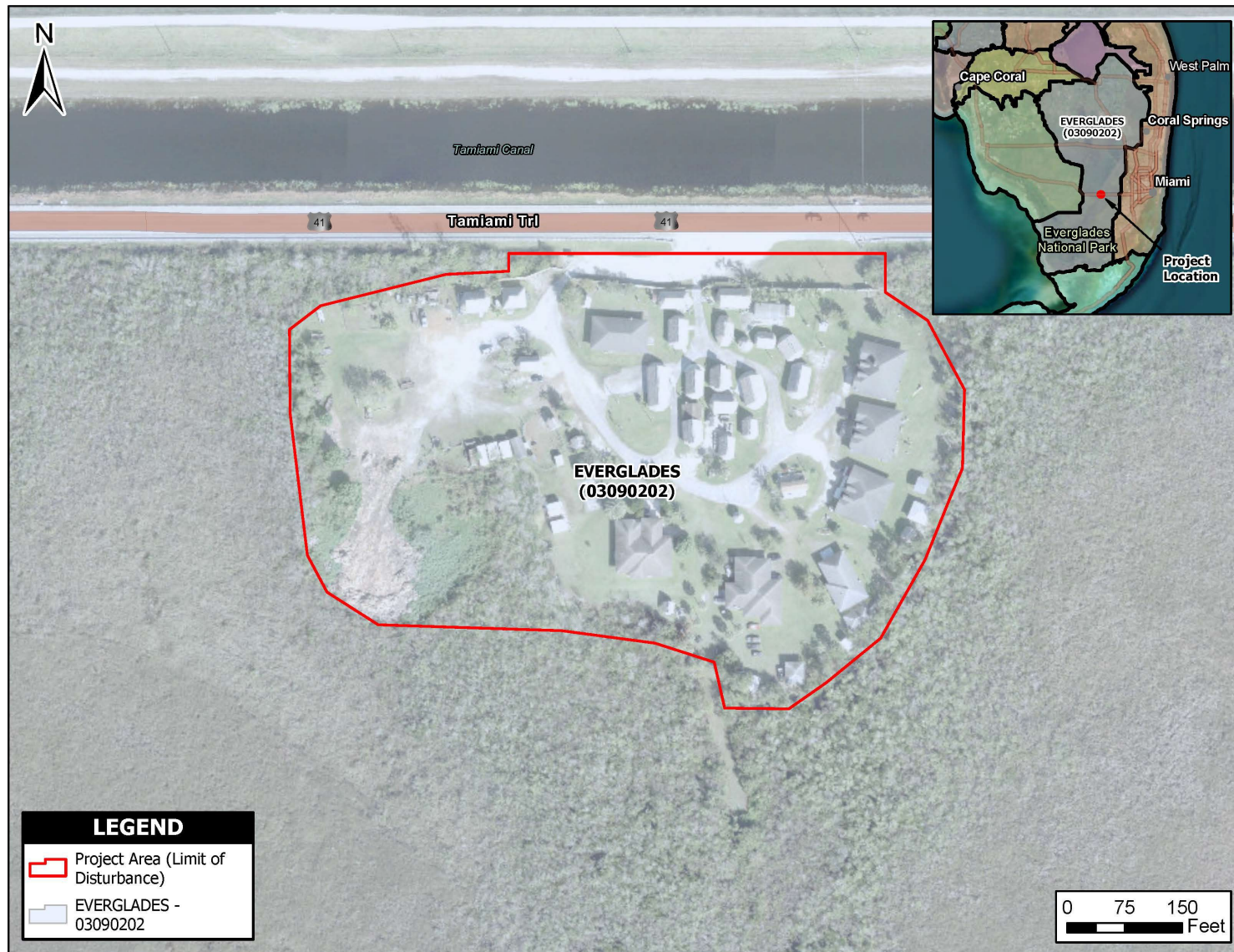
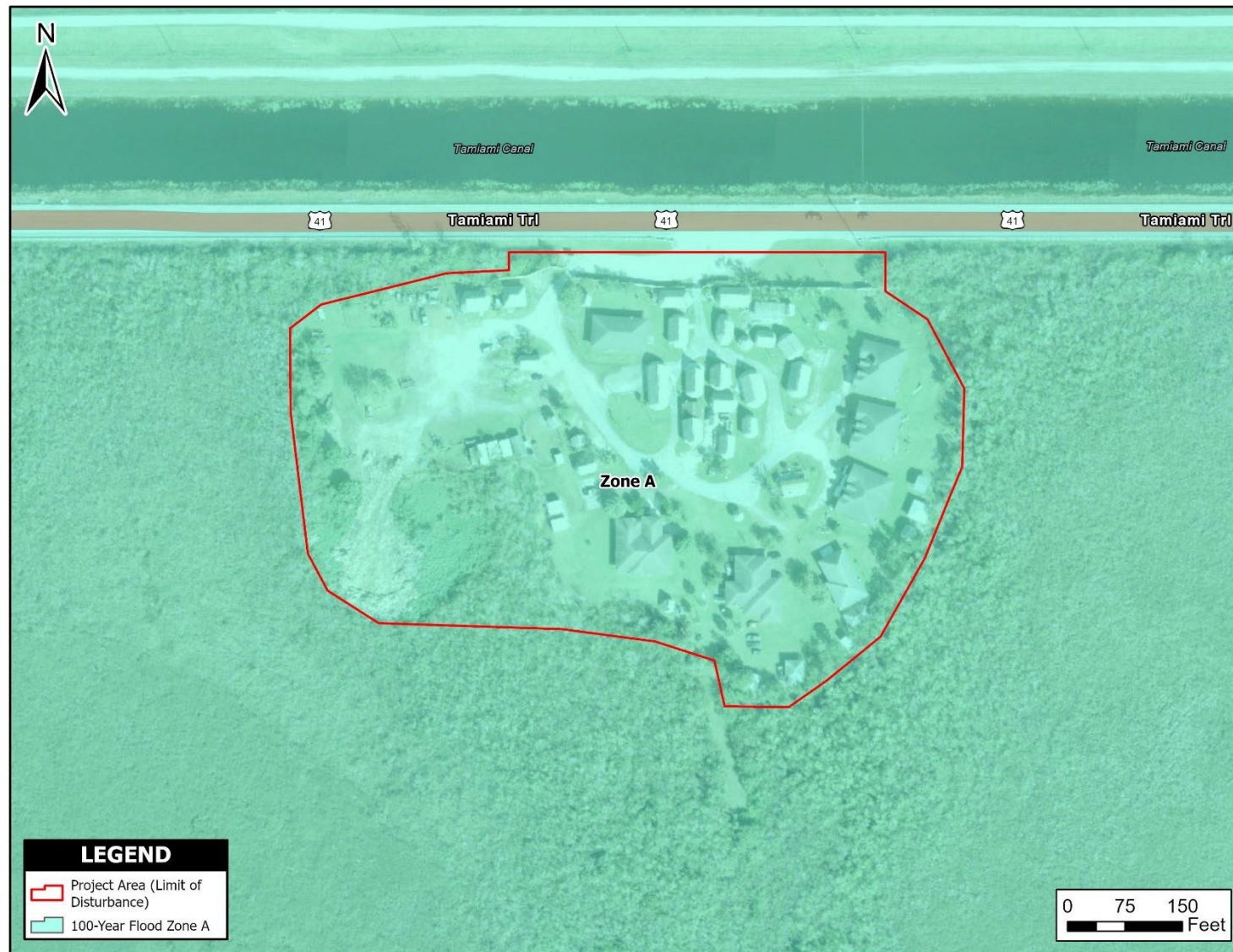


Figure 8 FEMA Floodplain Map



JUSTIFICATION FOR THE USE OF WETLANDS AND FLOODPLAINS

Wetland Impacts

Under the proposed action, 4.1 acres of wetland would be filled or disturbed, and their function would be permanently or temporarily lost as a result of the proposed construction activities. This includes the 2.7 acres of wetlands that were previously filled since the 2007 wetland delineation as well as 1.4 acres of current wetlands within the Project Area.

Floodplain Impacts

General

The proposed action is located entirely within the regulatory floodplain. The intent of the project, however, is to reduce flood risk by elevating structures above the current ground surface. Current obstructions within the floodplain would be raised above the future projected 100-year flood elevation. While these obstructions would be elevated above the floodplain, this would also mean the floodplain would be reduced in size, although this reduction would be minimal.

Potential Risk to Human Health and Safety

The proposed action would be beneficial to human health and safety because manmade structures would be elevated to heights greater than the future projected 100-year flood elevation as determined by the USACE as part of the CERP. This would ensure that all homes within the Project Area would be at a lower risk of flooding compared to the current condition.

Potential Risk to Property

Upon completion of the proposed action, all manmade features within the Project Area would be above USACE recommended elevations and outside of the future predicted 100-year floodplain. In turn, this would decrease the likelihood of property loss due to flood related occurrences. Risk to property would be significantly greater if the proposed action was not performed.

Potential Risk to Floodplain Functions and Values

The proposed action would not significantly impact floodplain functions and values. Construction activities would be limited to already disturbed areas. Furthermore, as part of the Cure Plan, hut structures within the Camp would be demolished and rebuilt with some being combined upon reconstruction. Depending on the designs of the newly combined huts, their footprint within the floodplain could be smaller, thus increasing the floodplain's capacity. Since some of the existing features designed to be combined upon reconstruction, floodplain storage capacity has the potential to increase depending on new feature design. When considering the greater floodplain area outside the Project Area, the effects of this project would be overall minimal. Upon completion of the proposed action, the floodplain would continue to operate as it does in its current condition.

Mitigation Measures

The following sections include mitigation measures for floodplain and wetland resources. Additionally, a list of permitting requirements is included for floodplain and wetland resources, as these measures are expected to contribute to the minimization of effects.

Floodplain Mitigation

NPS DO 77-2 requires federal agencies to develop guidance on the following: reducing the risk of flood loss; minimizing impacts of floods on human safety, health, and welfare; and restoring and preserving natural and beneficial values served by floodplain resources (NPS 2007). This order replaces the NPS floodplain management guidance provided in Special Directive 93-4. Additionally, any proposed future development within the Camp would adhere to received FDEP and USACE permits as further discussed within permitting mitigation measures. As part of the Project's USACE requirements, any proposed future development within the Camp would incorporate methods for minimizing flood damage, as contained in the National Flood Insurance Program Floodplain Management Criteria for Flood-Prone Areas (CFR 44,60.3), and in accordance with any additional state or county requirements for flood-prone areas.

Below are additional proposed measures to mitigate impacts to floodplains under the preferred alternative.

- Comply with DO 77-2 and raise all structures within the Camp above the future projected 100-year flood elevation to decrease probability of flooding within the Camp. To mitigate potential risk to property, structures within the Project Area would be elevated above the future projected 100-year flood elevation of 10.0 ft. NGVD (8.5 ft. NAVD). The structures would then meet the standards of the National Flood Insurance Program (44 CFR Part 60).
- Adhere to all BMPs resulting from required regulatory permits (further detailed below). To mitigate potential risk to human health and safety, a flood response plan would be developed. The NPS will coordinate with the Tribe for completing a flood response plan as part of the Special Use Permit for occupation of the site.
- Appropriate measures will be employed to prevent or control spills of fuels, lubricants, or other contaminants during project construction. Actions would be consistent with state water quality standards and CWA, Section 401 certification requirements.

Wetland Mitigation

NPS Procedural Manual 77-1 states that wetland compensation is required if short- and long-term adverse impacts to wetlands from the project total 0.1 acres or more (NPS 2016). Under the preferred alternative, 4.1 acres of wetlands would be permanently filled, therefore, compensatory mitigation is required. Compensatory mitigation will meet regulatory requirements associated with obtaining state and federal permits as well as meet the NPS standard of 1:1 mitigation on a per acre basis. Mitigation for permanent and temporary wetland impacts from this project will be offset through the purchase of wetland mitigation credits from the Hole-in-the-Donut (HID) Mitigation Bank. The HID Mitigation Bank is in the southeast portion of Everglades National Park and services the Project Area. The HID project is an approved wetland mitigation project under the CWA, as well as State law. This mitigation bank is the closest approved mitigation project to the site of impacts and mitigating at HID is consistent with NPS DO#77-1 guidance that requires all compensatory mitigation be acquired within the park, thus maintaining a no-net-loss of NPS managed wetlands.

In addition to meeting FDEP and USACE-based requirements for compensating for wetland impacts resulting from this work, NPS policy requires a minimum of 1:1 compensation on a per acre basis for new impacts to wetland plant communities that result from NPS actions. Impacts resulting from this project must meet the 1:1 compensation required for any newly impacted areas resulting from the expanded footprint required to raise the elevation of the Camp.

To fulfill the FDEP obligations for the 404 permit for this project, the park will purchase 2 UMAM palustrine emergent wetland credits from the HID Mitigation Bank. The purchase of 2.0 palustrine emergent wetland UMAM credits amounts to 5.26 federal acres being restored. The 5.26 acres fulfills the minimum 1:1 ratio needed to mitigate wetland impacts from Osceola Camp, as directed by D.O. #77-1 (Wetlands Protection).

Any temporary impacts to wetlands in areas surrounding the Project Area will be allowed to recover naturally in order to avoid/minimize the introduction or spread of non-native, invasive plant and animal species. If necessary, and in coordination with the park Biologist, any fill, mulch, reseeding, and sod material brought into the park must be free of non-native, invasive plants and animals, and noxious weeds. Orange construction fencing (4 ft) will be placed along the limits of disturbance. An NPS staff member or representative will be on site when the wetland fill is being placed and graded to make sure equipment does not impact wetlands beyond the fencing. Finally, NPS will continue to work to identify any measures to further minimize impacts to wetlands during the detailed design process.

Permitting

Below are proposed measures to acquire appropriate permits necessary for project construction. These measures will further aid in the reduction of anticipated impacts to floodplain and wetland resources.

- All permitting will be acquired from the FDEP prior to commencement of work.
- USACE 401 and Section 404, and National Pollutant Discharge Elimination System (NPDES) permits, as applicable, will be obtained for this project prior to commencement of work.
- An Erosion and Sediment Control and Stormwater Pollution Prevention Plan (SWPPP) will be developed to comply with the current FDEP NPDES requirements and a FDEP NPDES Construction General Permit coverage would be obtained. The SWPPP will be developed to address all stormwater management BMPs.

ADDITIONAL COMPLIANCE

In addition to Executive Orders 11988, 11990, and 13690, and NPS Director's Order #77-1: *Wetland Protection* and #77-2: *Floodplain Management*, compliance with other applicable laws and regulations pertaining to wetland and floodplain impacts will be acquired and include CWA Section 401 and 404, the National Environmental Policy Act of 1969, and Chapter 62-330 of the Florida Administrative Code. Therefore, a separate Compensatory Mitigation Plan will be developed and finalized in conjunction with, and as a requirement of, the FDEP's Section 404 permit process.

CONCLUSIONS

Due to water levels rising because of the CEPP, portions of the Project Area will be below flood elevations if no action is taken. This would negatively impact surrounding wetland and floodplains due to runoff from the Camp. In addition, residents within the Camp would be at risk of flooding. Therefore, negative impacts would be observed in human health and safety, property, wetlands, and floodplains if no action were taken. The proposed action includes raising the base elevations of structures within the Project Area outside of the future predicted 100-year flood zone. This alternative would mitigate the negative impacts that would be observed and experienced if no action were taken. The NPS evaluated additional alternatives but concluded that the preferred alternative would provide the greatest benefit with the least negative impacts.

The preferred alternative would involve the filling of 1.4 acres of wetlands within the Project Area. In addition, there are 2.7 acres of wetlands that have been previously filled that are accounted for in mitigation calculations. Therefore, the total area of wetland impacts is 4.1 acres, and 4.1 credit acres will be purchased as compensation. These credits are anticipated to be purchased from the HID Mitigation Bank. Compliance with all federal and state regulations and policies to minimize impacts to wetlands and floodplains would be strictly adhered to during and after construction. All necessary federal and state permits necessary to complete the project would be obtained before the beginning of construction. This project would not have any long-term negative impacts to surrounding wetlands and floodplains. Therefore, the NPS finds that the preferred alternative to be acceptable under Director's Order 77-2: *Floodplain Management* and Executive Order 11988 for the protection of floodplains and under Director's Order 77-1: *Wetland Protection* and Executive Order 11990 for the protection of wetlands.

QUALIFICATIONS OF THE DELINEATORS

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APPENDIX A

PART I – Qualitative Description
(See Rule 62-345.400, F.A.C.)

Site/Project Name National Park Service – Osceola Camp Everglades National Park Improvement to Miccosukee Camp		Application Number	Assessment Area Name or Number US 41 roadside ditch wetlands
FLUCCs code 510	Further classification (optional) ditched wetlands	Impact or Mitigation Site? Impact	Assessment Area Size 0.2 acres
Basin/Watershed Name/Number Everglades National Park	Affected Waterbody (Class) N/A	Special Classification (i.e. OFW, AP, other local/state/federal designation of importance) Outstanding Florida Waters	
Geographic relationship to and hydrologic connection with wetlands, other surface water, uplands Roadside ditched wetlands adjacent to US 41 and the small filled residential village site on South side of US 41. Exotic infested wetlands wetlands within Everglades National Park			
Assessment area description The existng wetlands adjacent to an existing tribal residential village surrounded on 3 sides by Everglades National Park and on the north side by US 41 and the associated roadside ditches.			
Significant nearby features Everglades National Park, US 41, existing residential homesites, small area where materials are processed for the chickee's		Uniqueness (considering the relative rarity in relation to the regional landscape.) Not unique - the first residential homes at this site were constructed on fill placed here in the early 1960's within Everglades National Park on the south side of US 41	
Functions Collects runoff from US 41 and also collects and directs untreated runoff from the filled village property directly into Everglades National Park.		Mitigation for previous permit/other historic use N/A	
Anticipated Wildlife Utilization Based on Literature Review (List of species that are representative of the assessment area and reasonably expected to be found) fish, aquatic reptiles and amphibians, forage habitat for wading birds in the Everglades. Seasonal refugia for numerous freshwater invertebrates including crayfish, snails, shrimp, etc..		Anticipated Utilization by Listed Species (List species, their legal classification (E, T, SSC), type of use, and intensity of use of the assessment area) Potential forage habitat for several listed wading bird species including wood stork, limited potential for use by everglades mink, other listed species present in the Everglades.	
Observed Evidence of Wildlife Utilization (List species directly observed, or other signs such as tracks, droppings, casings, nests, etc.): Numerous fish species, cooter, alligator, little blue heron, white ibis, American egret			
Additional relevant factors: This is a small filled tribal residential area surrounded by Everglades National Park. Minimal impacts from the activities on site due to small number of residents. Runoff collected in the roadside ditch is discharged untreated into the Everglades.			
Assessment conducted by: C Schmittler / A Cabrera		Assessment date(s): 3/27/2023	

PART II – Quantification of Assessment Area (impact or mitigation)
(See Rules 62-345.500 and .600, F.A.C.)

Site/Project Name National Park Service – Osceola Camp Everglades National Park Improvement to Miccosukee Camp	Application Number	Assessment Area Name or Number US 41 roadside ditch wetlands
Impact or Mitigation Impact	Assessment conducted by: C. Schmittler / A Cbrera	Assessment date: 3/27/2023

Scoring Guidance
The scoring of each indicator is based on what would be suitable for the type of wetland or surface water assessed

Optimal (10)	Moderate(7)	Minimal (4)	Not Present (0)
Condition is optimal and fully supports wetland/surface water functions	Condition is less than optimal, but sufficient to maintain most wetland/surface waterfunctions	Minimal level of support of wetland/surface water functions	Condition is insufficient to provide wetland/surface water functions

.500(6)(a) Location and Landscape Support w/o pres or current with 2 0	Pre scores include the roadside ditch wetlands between US 41 and the Miccosukee Village. There is limited natural habitat remaining in this general area and the scores are very low due to this lack of habitat. Post scores will decrease due to the filling and displacement of the minimal wetland and buffer habitat that will be filled. US 41 will still be present to the north and the village to the south. Adjacent land uses in the village will not change.
.500(6)(b)Water Environment (n/a for uplands) w/o pres or current with 3 0	Pre scores are higher because water flow does occur even though it is untreated and ditched. There are no natural, undisturbed wetlands in this specific area of the proposed development improvements. Currently untreated runoff from US 41 flows directly into this roadside ditch and eventually outfalls into the Everglades as untreated discharge. Post scores will be much lower due to the filling of the wetlands for improvements to the camp property. However, water quality improvements and treatment from the village property will benefit the receiving Everglades waters.
.500(6)(c)Community structure 1. Vegetation and/or 2. Benthic Community w/o pres or current with 3 0	Pre scores are higher which reflects the presence of some desirable wetland vegetation in these ditched wetland habitats. However, the existing exotic infested wetlands are of poor quality and contain only limited numbers of desirable native wetland species. Post scores drop to zero as a result of fill placement in the ditched wetlands for the improvements to the camp. This fill will result in the loss of the limited wetland function and water quality treatment in the areas affected.

Score = sum of above scores/30 (if uplands, divide by 20)
current or w/o pres with
0.26667 0

If preservation as mitigation,
Preservation adjustment factor =
Adjusted mitigation delta =

For impact assessment areas
FL = delta x acres = -0.266 x 0.2 = -0.1

Delta = [with-current]
-0.267

If mitigation
Time lag (t-factor) =
Risk factor =

For mitigation assessment areas
RFG = delta/(t-factor x risk) =

PART I – Qualitative Description
(See Rule 62-345.400, F.A.C.)

Site/Project Name National Park Service – Osceola Camp Everglades National Park Improvement to Miccosukee Camp		Application Number	Assessment Area Name or Number Everglades perimeter wetlands
FLUCCs code 617	Further classification (optional) Mixed Wetland Hardwood	Impact or Mitigation Site? Impact	Assessment Area Size 3.9 acres
Basin/Watershed Name/Number Everglades National Park	Affected Waterbody (Class) N/A	Special Classification (i.e. OFW, AP, other local/state/federal designation of importance) Outstanding Florida Waters	
Geographic relationship to and hydrologic connection with wetlands, other surface water, uplands Adjacent to small filled residential village site on South side of US 41, non-forested wetlands within Everglades National Park			
Assessment area description The existng wetlands adjacent to an existing residential village surrounded on 3 sides by Everglades National Park and on the north side by US 41 and the associated roadside ditches			
Significant nearby features Everglades National Park, US 41, existing residential homesites, small area where materials are processed for the chickee's		Uniqueness (considering the relative rarity in relation to the regional landscape.) Not unique - the first residential homes at this site were constructed on fill placed here in the early 1960's within Everglades National Park on the south side of US 41	
Functions untreated runoff from the filled village property discharges directly into Everglades National Park, untreated runoff from US 41 also discharges directly into the park from the roadside ditches		Mitigation for previous permit/other historic use N/A	
Anticipated Wildlife Utilization Based on Literature Review (List of species that are representative of the assessment area and reasonably expected to be found) fish, aquatic reptiles and amphibians, forage habitat for wading birds in the Everglades. Seasonal refugia for numerous freshwater invertebrates including crayfish, snails, shrimp, etc..		Anticipated Utilization by Listed Species (List species, their legal classification (E, T, SSC), type of use, and intensity of use of the assessment area) Potential forage habitat for several listed wading bird species including wood stork, limited potential for use by everglades mink, other listed species present in the Everglades.	
Observed Evidence of Wildlife Utilization (List species directly observed, or other signs such as tracks, droppings, casings, nests, etc.): Numerous fish species, cooter, alligator, little blue heron, white ibis, American egret			
Additional relevant factors: This is a small filled area surrounded by Everglades National Park. Minimal impacts from the activities on site due to small numer of residents.			
Assessment conducted by: C Schmittler / A Cabrera		Assessment date(s): 3/27/2023	

PART II – Quantification of Assessment Area (impact or mitigation)
(See Rules 62-345.500 and .600, F.A.C.)

Site/Project Name National Park Service – Osceola Camp Everglades National Park Improvement to Miccosukee Camp	Application Number	Assessment Area Name or Number Everglades adjacent wetlands
Impact or Mitigation Impact	Assessment conducted by: C. Schmittler / A Cbrera	Assessment date: 3/27/2023

Scoring Guidance
The scoring of each indicator is based on what would be suitable for the type of wetland or surface water assessed

Optimal (10)	Moderate(7)	Minimal (4)	Not Present (0)
Condition is optimal and fully supports wetland/surface water functions	Condition is less than optimal, but sufficient to maintain most wetland/surface waterfunctions	Minimal level of support of wetland/surface water functions	Condition is insufficient to provide wetland/surface water functions

<p>.500(6)(a) Location and Landscape Support</p> <p>w/o pres or current with</p> <p>7 0</p>	<p>Pre scores include the buffering of the Everglades over much of the area being considered with the existing filled residential camp site making up the other parts. The existing habitat scores are fairly high because it's Everglades National Park, the habitat is fairly high quality. Adjacent land uses are minimal except for the Miccosukee Village facilities and US 41 to the north.</p> <p>Post scores will decrease due to the filling and displacement of the wetlands vegetation. US 41 will still be present to the north. Adjacent land uses in the village will not change.</p>
<p>.500(6)(b)Water Environment (n/a for uplands)</p> <p>w/o pres or current with</p> <p>7 0</p>	<p>Pre scores are higher because water sheet flow is natural and unobstructed through the Everglades, however US 41 directly discharges untreated water into the Florida Everglades.</p> <p>Post scores will be much lower of the filling of the wetlands for improvements to the camp property. However, water quality improvements around the filled areas will benefit the receiving Everglades waters.</p>
<p>.500(6)(c)Community structure</p> <p>1. Vegetation and/or 2. Benthic Community</p> <p>w/o pres or current with</p> <p>7 0</p>	<p>Pre scores are higher which reflects the existing marsh wetlands of the Everglades. The existing exotic infested wetland edges will be removed resulting in higher quality wetlands adjacent to the camp property.</p> <p>Post scores drop to zero as a result of fill placement in the wetlands for the improvements to the camp. This fill will result in the loss of wetland function and water quality treatment in the areas affected.</p>

Score = sum of above scores/30 (if uplands, divide by 20)
current or w/o pres with
0.700 0

If preservation as mitigation,
Preservation adjustment factor =
Adjusted mitigation delta =

For impact assessment areas
FL = delta x acres = -0.7000 x 3.9 = -2.73

Delta = [with-current]
-0.7000

If mitigation
Time lag (t-factor) =
Risk factor =

For mitigation assessment areas
RFG = delta/(t-factor x risk) =

Appendix D:
Errata for Miccosukee Tribe of Indians of Florida Osceola
Camp Cure Plan

The following text has been changed based on necessary changes regarding the function of floodplains and coordination with the Tribes.

Headings and page numbers referenced pertain to the Environmental Assessment. Original text from the EA is included to provide context and to allow for comparison to the text change.

Additions to text are underlined and deleted text is shown by ~~strikeout~~.

Environmental Trends

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Everglades NP experience intense periods of rain referred to as the “wet season” starting in mid-May and continuing through November where water levels from month-to-month may drastically change (NPS 2015b). This already naturally fluctuating hydrology within the Everglades has been severely altered over the past 150 years due to construction of roadways and drainage structures to allow for development within the Everglades. These activities have altered flow regimes within Everglades NP, particularly south of Tamiami Trail, where the Project Area is located. The Camp can experience minor flooding and standing water in low-lying areas during high rain events. In some areas, fill has been brought in to mitigate flooding. The CERP, which will restore historic flow patterns within the Everglades, will also increase the amount of water currently being delivered to Everglades NP and the Camp; therefore, This will introduce more strain on the floodplain. ~~However,~~ the floodplain would be restored to natural flow patterns and historic functions. This return to natural flow pattern will be beneficial to Everglades NP ecosystem as a whole but will increase flooding potential to the Camp. Furthermore, when the effects of climate change is taken into account, water levels within Everglades NP are anticipated to rise in addition to actions associated with the CERP. When both effects of climate change and the CERP are considered, the floodplain within Everglades NP is anticipated to retain more water than it currently does for an overall beneficial effect.

Alternatives, Alternative B – Proposed Action/Preferred Alternative (Improvements)

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The NPS proposed action and the preferred alternative, Alternative B, would increase the site elevations at the Camp to allow for the implementation of components of the CEPP while also preserving the Camp facilities, in addition to maintaining the functions and public health of the residents. The modifications would ensure that the Camp meets the higher elevation than the 100-year flood elevation of 10.0 NGVD [8.5 ft. North American Vertical Datum (NAVD)]. The Camp facilities would be raised based on the USACE’s minimum required elevations. ~~as follows:~~ Through the park’s coordination with the Tribes, the Camp facilities would be raised as follows:

- 10.0 - 10.5 ft. NGVD (8.5 - 9.0 ft. NAVD) for ground surface elevations
- 11.0 - 11.5 ft. NGVD (9.5 - 10.0 ft. NAVD) for finished floor elevations of non-residential structures
- 11.1 - 11.4 ft. NGVD (9.6 - 9.9 ft. NAVD) for finished floor elevations of residential structures

The Project Area generally consists of filled areas of paved/unpaved gravel areas and green areas consisting of vegetation, grass and bare dirt. The general ground surface would be elevated by removing the top three inches of the organic surface materials prior to placing and compacting the fill. The fill from the demolition of Old Tamiami Trail from the Next Steps Project would be utilized for the site elevations (NPS 2018). The fill material would be transported to the Camp and used to raise the elevation of select structures by placing it on a new slab on top of that fill material. A total of 18,500 cubic yards of fill would be required for Project improvements. The fill has been tested for pollutants and is safe for human use. The fill is currently stockpiled approximately 0.75 miles away from the Camp and would be used as needed to fill the areas to be raised.

In addition, a total of 25 chickee hut structures (huts) would be demolished as they do not meet the required finish floor elevations. Once the structures are demolished, the debris would be removed and transported to the nearest landfill for those types of materials. The grade would be elevated at the sites for the new huts to meet the CERP guidelines of 11.0 ft. NGVD for non-residential structures and time allowed for the Tribes to rebuild the huts prior to construction continuing. The huts would be reconstructed out of the traditional wood pole framing with a thatched roof. A total of 15 storage structures would be demolished, disposed offsite and rebuilt in new locations.

Approximately 17,000 square feet (sf.) of the gravel road, 1,700 sf. of asphalt pavement, and 4,000 sf. of asphalt walkway would be removed and disposed offsite. The new roadway would consist of 35,349 sf. of asphalt pavement and would meet the minimum elevation of 10.0 ft. NGVD. All residences would have concrete parking pads; approximately 21 total, would be constructed throughout the Project Area (three for each residential house).

Alternatives, Figure 4 – Alternative B – NPS Proposed Action and Preferred Alternative **Page 10**

See next page for updated Figure 4.

