



National Park Service
U.S. Department of the Interior
Yellowstone National Park
Wyoming, Montana, Idaho

Finding of No Significant Impact

Old Faithful Cabin Repurposing and Dormitory Construction

(Amendment to 1985 Old Faithful Development Concept Plan)

Background

In compliance with NEPA, the National Park Service (NPS) prepared an Environmental Assessment (EA) to examine various alternatives and environmental impacts associated with amending the 1985 Old Faithful Development Concept Plan (DCP) decision to remove all Old Faithful Lodge Cabins. The amended decision would address repurposing the cabins to provide an increased number of affordable visitor lodging units at Old Faithful. Consistent with the 1985 DCP, construction of a new concessioner employee dormitory with additional parking would allow for the separation of existing employee housing from high visitor use areas, enhancing safety and improving accessibility of pathways to the cabin area, as well as rehabilitating the interior of the cabin units.

The proposed project is needed to provide an increased number of affordable visitor lodging units at Old Faithful. The Old Faithful Lodge Cabins have consistently been one of the most popular lodging accommodations within the Park. This popularity is likely in part due to the fact that the cabins are some of the least expensive lodging within the Park. An increased number of affordable cabin units could be made available by relocating concession employees housed in cabin units that are intermixed with cabins used for visitor lodging. Displaced employees would then be housed in a new dormitory that would be constructed in the administrative area, consistent with a need and proposal identified in 1985. Relocating employees to a dormitory would also work toward separating employee housing from high visitor use areas. The dormitory was proposed to be constructed in the administrative area near the existing Larkspur Dormitory that also houses concessioner employees. Concessioner employees have been housed in the Old Faithful Lodge cabin units since 1999 due to the removal of employee cabins when Snowlodge was built.

Selected Action

Alternative B, Repurpose Cabins and Construct New Dormitory, is the preferred alternative and NPS's selected action because it best meets the purpose and need for the project as well as the project objectives to 1) provide for additional affordable lodging options, 2) remove employee housing from high visitor use area to reduce potential conflicts that can arise from incompatible uses, 3) enhance safety of asphalt pathways that have deteriorated overtime, 4) improve accessibility for visitors using the cabin area.

Under Alternative B, 28 cabin buildings (67 units) that are presently used for concessioner employee housing will be used for affordable visitor overnight lodging. Some utility lines and asphalt walkways within the area will be replaced or repaired. The interior of the cabins will be rehabilitated. Renovations will include new floor coverings, wall coverings, electrical systems, bathroom fixtures, and gas heaters. A new approximately 80 room dormitory in either a single building or multiple clustered building units will be constructed in the Administrative Area (south of the Grand Loop Road) to house up to 144 employees, most of which would be displaced by the repurposing of the cabins to a visitor use function. A 65-vehicle parking lot will be constructed near the proposed dormitory building/s. It is assumed parking spaces will be constructed adjacent

to existing access roads, and the road will become the maneuvering space for the lot. It is estimated that approximately 12,000 square feet (0.28 acre) of area will be needed for a capacity of 65 vehicles. Permeable pavement will be used to allow rainfall to percolate through the pavement helping to recharge underground hydrological systems. The proposed dormitory building will be served by existing utilities near the site, including water, sewer, electric, and gas. Connecting these existing utilities to the new dormitory building will entail excavation and placement of additional underground piping/wiring.

Mitigation Measures

General Construction

To minimize the amount of ground disturbance, staging and stockpiling areas will be in previously disturbed sites, away from visitor use areas to the greatest extent possible. All staging and stockpiling areas will be returned to pre-construction conditions following construction.

Construction zones will be identified and fenced with construction tape, snow fencing, or some similar material prior to any construction activity. The fencing will define the construction zone and confine activity to the minimum area required for construction. All protection measures will be clearly stated in the construction specifications and workers will be instructed to avoid conducting activities beyond the construction zone as defined by the construction zone fencing.

Fugitive dust generated by construction will be controlled by spraying water on the construction site, if necessary. Any water used for dust control will be taken from fire hydrants in the administrative area, or a source approved by the Park.

To minimize possible petrochemical leaks from construction equipment, the contractor will regularly monitor and check construction equipment to identify and repair any leaks.

To minimize the potential for impacts to Park visitors, variations on construction timing will be considered. One option includes conducting the majority of the work in the shoulder seasons (spring and fall). Another option includes implementing daily construction activity curfews such as not operating construction equipment on busy holiday weekends, or between 6 PM and 7 AM in summer (May – September) to reduce noise impacts to Park visitors and Park employees housed adjacent to the proposed dormitory site. The NPS will determine this in consultation with the contractor.

Construction workers and supervisors will be informed about the special sensitivity of the Park's values, regulations, and appropriate housekeeping.

According to the NPS 2006 *Management Policies*, NPS will strive to construct facilities with sustainable designs and systems to minimize potential environmental impacts. Development will not compete with or dominate the Park's features, or interfere with natural processes, such as the seasonal migration of wildlife or hydrologic activity associated with wetlands or hydrothermal processes. To the greatest extent possible, the design and management of facilities will emphasize environmental sensitivity in construction, use of nontoxic materials, resource conservation, recycling, and integration of visitors with natural and cultural settings. The NPS also reduces energy costs, eliminates waste, and conserves energy resources by using energy-efficient and cost-effective technology.

Soils and Geology

Topsoil conservation measures will be employed prior to construction to enhance revegetation efforts following the construction phase.

Disturbed soils are more susceptible to erosion and until revegetation takes place, standard erosion

control measures such as silt fences and/or sand bags will be used to minimize any potential soil erosion.

Hydrothermal

A hydrothermal assessment will be conducted prior to construction of an employee dormitory to ensure that no changes in hydrothermal systems have occurred in the area of proposed construction. Thermal design considerations, such as pervious pavement for the parking lot, maximum depth of excavation, and use of the alternate location will be dictated by the results of the assessment.

Vegetation and Rare Plants

Revegetation and recontouring of disturbed areas will take place following construction and will be designed to minimize the visual intrusion of the structure and landscape. Revegetation efforts will strive to reconstruct the natural spacing, abundance, and diversity of native plant species. All disturbed areas will be restored as nearly as possible to pre-construction conditions shortly after construction activities are completed. Weed control methods will be implemented to minimize the introduction of noxious weeds. This project will follow Topsoil Retention/Vegetation Guidelines developed for previous projects within the park. Some trees may be removed, but other existing vegetation at the site will not be disturbed to the greatest extent possible.

Any equipment used will be cleaned using NPS protocols for reducing the spread of any exotic or problem species.

Construction workers and supervisors will be informed about special status plant species, such as the Yellowstone sulphur wild buckwheat (*Eriogonum umbellatum* var. *cladophorum*). Contract provisions will require protection of this plant species if discovered in the project area.

Wildlife

Best management practices will be implemented to protect grizzly bears. Any trash receptacles in the area of the repurposed cabins, or the proposed dormitory will be of a design considered "bear proof". All outdoor food storage will adhere to park policies already in place to ensure no unattended food sources are available to wildlife.

All contractors and employees will be educated about working in grizzly bear country and briefed on proper food storage and safety measures.

All tree removal activities will occur outside of the migratory bird nesting season (May 15 – August 15).

Soundscapes and Air Quality

To reduce noise and emissions, construction equipment will not be permitted to idle for more than 10 minutes while not in use according to the Superintendent's Compendium, based on CFR 36 § - 5.13 Nuisances.

Cultural Resources

Should construction unearth previously undiscovered cultural resources, work will be stopped in the area of the discovery and the Park will consult with the state historic preservation officer and the Advisory Council on Historic Preservation, as necessary, according to §36 CFR 800.13, *Post Review Discoveries*. In the unlikely event that human remains are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act (1990) will be followed.

The NPS will ensure that all contractors and subcontractors are informed of the penalties for illegally collecting artifacts or intentionally damaging paleontological materials, archeological sites, or historic properties. Contractors and subcontractors will also be instructed on procedures to follow in case previously unknown paleontological or archeological resources are uncovered during construction.

Alternatives Considered

Three alternatives were evaluated in the EA including the no action alternative and two action alternatives. The no action alternative will follow the decisions of the 1985 Development Concept Plan for the Old Faithful area which calls for removal of all the Old Faithful Lodge Cabins and construction of a new dormitory for concessioner employees in the Old Faithful Administrative Area. Alternative B will amend the 1985 Old Faithful Development Concept Plan decision to remove all Old Faithful Lodge Cabins and addresses repurposing the cabins to provide an increased number of affordable visitor lodging units at Old Faithful and construction of a new concessioner employee dormitory with additional parking, separating employee housing from high visitor use areas, enhancing safety and improving accessibility of pathways to the cabin area, as well as rehabilitating the interior of the cabin units. Alternative C describes the existing conditions if cabins are kept as employee housing and no concessioner employee dormitory was constructed in the Old Faithful Administrative Area. This alternative will also amend the 1985 DCP decision to remove the cabins.

Environmentally Preferable Alternative

According to the NPS regulations implementing NEPA (43 CFR 46.30), the environmentally preferable alternative is the alternative "that causes the least damage to the biological and physical environment and best protects, preserves, and enhances historical, cultural, and natural resources. The environmentally preferable alternative is identified upon consideration and weighing by the Responsible Official of long-term environmental impacts against short-term impacts in evaluating what is the best protection of these resources. In some situations, such as when different alternatives impact different resources to different degrees, there may be more than one environmentally preferable alternative."

Alternative A (No Action – 1985 Old Faithful Development Concept Plan) shares being the environmentally preferred alternative with Alternative B listed below for the following reasons: 1) all the Old Faithful Lodge Cabins will be removed and the area's vegetation will be restored to as close to natural conditions as possible; 2) removal of the utilities associated with the cabins followed by subsurface restoration will allow more natural heat and water flows to resume in the area.

The selected action, Alternative B (Repurposing Cabins and Construct New Dormitory) shares being the environmentally preferable alternative for several reasons: 1) using the cabins for a long-term visitor use function changes the decision to remove the historic cabins as called for in the 1985 DCP. These contributing elements of the Old Faithful Historic District will be retained into the future. Improved upkeep of the cabins (a cultural resource-considered contributing elements to the Old Faithful Historic District) will occur; 2) construction of a new employee dormitory in the administrative area will help to separate potentially incompatible uses and noise impacts from this more serene area of the development; 3) the area around the cabins and within the historic district will be cleared of items that accompany seasonal employee housing (extra vehicles, outdoor equipment, bicycles and household items); and 4) while there will be some new ground disturbance that would damage up to 1.08 acres of previously undisturbed lodgepole pine forest, the design of the new dormitory building would be within the footprint of the existing Old Faithful Administration Area, thereby causing no expansion of the developed area footprint. For these

reasons, Alternative B causes the least damage to the biological and physical environment and best protects, preserves, and enhances historical, cultural, and soundscape resources, thereby sharing as the environmentally preferable alternative with Alternative A.

By contrast, Alternative C (Existing Conditions) is not the environmentally preferable alternative because: 1) the cabins are not maintained as well as they could be due to limited funding, and many higher priority projects; 2) this alternative does nothing to improve the asphalt walkways of the area, and safety concerns with uneven walks, potholes, and raveling edges would continue; and 3) deterioration of cabins, utility lines and associated infrastructure would likely continue and worsen over time on these important historic properties. 4) The cabins would not be removed in this alternative; therefore the site would not be restored to a natural condition.

Why the Selected Action 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 be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial.

Implementation of the selected action (Alternative B) will result in some adverse impacts; however, the overall benefit of the project, particularly to visitor use and experience, outweighs these negative effects. The adverse effects are summarized as follows. Construction activities will disturb soils and geology in a minor and adverse degree due to changes in soil properties, loss of soil to wind and water erosion, a decrease in soil biological activity, an increase in soil compaction, and a suitable stratum for establishment of weeds from excavation and other ground disturbance activities associated with construction of the dormitory, parking lot, and utility lines. Hydrothermal impacts will be minor and adverse due to activities associated with the continued use of the Old Faithful Lodge Cabins and the necessary utility maintenance, repair and replacement as well as potential additional pervious surface. Removing ground cover from construction activities will cause a minor, adverse impact on vegetation. Minor and adverse impacts will result due to a continuation of human activity in the area. Historic structures will have a minor, adverse impact due to past removal of historic structures within the district. Cultural landscapes impacts will be negligible due to the new dormitory being located outside the historic district. Socioeconomics impacts will be minor and adverse due to a potential for competition with lodging providers in gateway communities.

Implementing the selected action (alternative B) will have beneficial impacts for visitor use and experience because there will be an increase of approximately 134 overnight visitors at Old Faithful during the summer season that can find affordable lodging. Utilizing all the cabins for visitor lodging will help address separating sometimes conflicting uses of, visitor accommodations and employee housing. Beneficial impacts to socioeconomics in the area will likely occur due to an increase in park revenue attributed to renting the cabins, much of which will likely be spent in the local economy in the form of additional housekeeping wages and materials and wages for repairs and rehabilitation of the cabins. Further, the repurposing of the cabins will provide for additional affordable lodging options, enhance safety of asphalt pathways that have deteriorated overtime, improve accessibility for visitors using the cabin area.

The degree to which the proposed action affects public health or safety

The preferred alternative will have an overall beneficial effect on public health and safety, particularly for visitors who will be staying in the cabin units. Asphalt walkways within the area are old and deteriorating with numerous rough spots, uneven surfaces, raveling edges, and missing

pavement. These walkways will be replaced or repaired as part of this project, thereby providing a safer environment for visitors.

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

The selected action will not impact unique characteristics of the area including park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas because these resources do not exist in the project area, or in the case of park lands and ecologically critical areas, the construction of the dormitory would occur in the administrative area, away from critical thermal areas, and in an area designated for such purposes because it is remote to these resources.

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

Throughout the environmental process, the proposal to repurpose the cabins and construct a new dormitory was not highly controversial. Of the comments received on the environmental assessment that expressed an opinion about an alternative, 44 of 87 preferred the selected action. Public scoping and comment on the proposal did not indicate any contentious issues and the EA did not identify significant impacts associated with the selected action. The majority of public comment was in favor of returning the cabins back to a visitor use function.

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

No highly uncertain effects or unique or unknown risks are anticipated to occur by implementing the selected action. The selected action will improve conditions in a way that enhances visitor experience and safety while providing a functional living environment for concession employees. Actions proposed under the selected action will utilize standard construction and operation techniques and other mitigation measures to minimize the degree and/or severity of adverse impacts.

The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration

The selected action is not expected to set a precedent for future actions with significant effects, nor does it represent a decision in principle about a future consideration.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.

Cumulative effects were analyzed in the EA and no significant cumulative impacts were identified.

The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.

Impacts to historic structures will be direct, minor, local, long-term, and adverse due to the past removal of historic structures within the historic district. Construction of the proposed dormitory will occur outside the historic district. Cultural landscape resource impacts will be negligible due to the proposed dormitory location being outside of the defined cultural landscape for Old Faithful. In accordance with §106 of the National Historic Preservation Act, NPS provided the Wyoming State Historic Preservation Officer an opportunity to comment on the effects of this project. A letter

from the Wyoming State Historic Preservation Office, dated January 12, 2012 concurred that the interiors of the cabins were not contributing to the National Register eligibility of the cabins. Two additional letters from the Wyoming State Preservation Office dated February 14, 2012, and March 2, 2012, concurred that Alternative B, the selected action would have the least impact or effect on the historic properties, districts, and landscapes. The park will continue to consult with the Wyoming State Historic Preservation Office as design progresses to ensure that no adverse effect occurs from any changes from pathway lighting in the cabin area.

The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.

Under Section 7 of the Endangered Species Act (Act) of 1973, as amended 50 CFR §402.13, Yellowstone National Park requested informal consultation from the U.S. Fish and Wildlife Service on January 17, 2012 for the following federally listed Threatened and Endangered (T&E) species: grizzly bear (*Ursus arctos horribilis*); gray wolf (*Canis lupus*); and lynx (*Lynx canadensis*). Yellowstone National Park requested concurrence from the U.S. Fish and Wildlife Service on the determination of may affect, but is not likely to adversely affect grizzly bear and gray wolf. The Park determined that there is no effect on Canada lynx or Canada lynx critical habitat. On February 14, 2012, YNP received a letter from the U.S. Fish and Wildlife Service (Service) stating they reviewed the EA and concurred with the Park's determination of effects to these species for the selected action.

Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment

The action will not violate any federal, state, or local laws or environmental protection laws.

Public Involvement and Native American Consultation

The EA was made available for public review and comment during a 30-day period ending February 26, 2012. To notify the public of this review period, a letter was mailed to stakeholders, Native American tribes, and interested parties. Copies of the document were sent to 5 individuals who requested a copy during the scoping period; and posted on the NPS PEPC website at <http://parkplanning.nps.gov/yell>. No tribal member requested a copy of the EA. 55 pieces of correspondence with a total of 87 comments were received during the review period. No comments were received from Native American tribes. A majority of the comments, 44 out of 87 were in support of the preferred alternative. Only one comment opposed the selected alternative and supported Alternative C- Existing Conditions. Substantive comments centered on issues about employee housing, location of dormitory, parking, impact of proposal and alternatives. These comments are addressed in the "Response to Comments" Sheets attached to this FONSI. The FONSI and comment replies will be sent to all individuals who provided comments.

Conclusion

As described above, the selected action does not constitute an action meeting the criteria that normally require preparation of an environmental impact statement (EIS). The selected action will not have a significant effect on the human environment. Environmental impacts that could occur are limited in context and intensity, with generally adverse impacts that range from localized to widespread, short- to long-term, and negligible to moderate. There are no unmitigated adverse effects on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative

effects, or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection law.

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

Approved:

Laura D. Joss
John Wessels

April 2, 2012
Date

Regional Director, Intermountain Region, National Park Service

Non-Impairment Finding

National Park Service's *Management Policies, 2006* require analysis of potential effects to determine whether or not actions will impair park resources. The fundamental purpose of the national park system, established by the Organic Act and reaffirmed by the General Authorities Act, as amended, begins with a mandate to conserve park resources and values. National Park Service managers must always seek ways to avoid, or to minimize to the greatest degree practicable, adversely impacting park resources and values.

However, the laws do give the National Park Service the management discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, as long as the impact does not constitute impairment of the affected resources and values. Although Congress has given the National Park Service the management discretion to allow certain impacts within park, that discretion is limited by the statutory requirement that the National Park Service must leave park resources and values unimpaired, unless a particular law directly and specifically provides otherwise. The prohibited impairment is an impact that, in the professional judgment of the responsible National Park Service manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values. 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;
- key to the natural or cultural integrity of the park; or
- identified as a goal in the park's general management plan or other relevant NPS planning documents.

An impact would 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.

The park resources and values that are subject to the no-impairment standard include:

- the park's scenery, natural and historic objects, and wildlife, and the processes and conditions 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; archeological 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.

Impairment may result from National Park Service activities in managing the park, visitor activities, or activities undertaken by concessioners, contractors, and others operating in the park. The NPS's threshold for considering whether there could be an impairment is based on whether an action will have significant effects.

Impairment findings are not necessary for visitor use and experience, socioeconomic, public health and safety, environmental justice, land use, and park operations, because impairment findings relates back to Park resources and values, and these impact areas are not generally considered Park resources or values according to the Organic Act, and cannot be impaired in the same way that an action can impair park resources and values. After dismissing the above topics, topics remaining to be evaluated for impairment include geology and soils, hydrothermal resources, vegetation and rare plants, wildlife, special status wildlife species and Yellowstone species of management concern, historic structures, and cultural landscapes.

Fundamental resources and values for the Park are identified in the *Master Plan* and *Foundation Statement*. According to these documents Yellowstone's geology, geothermal, wildlife, human history, and largely intact ecosystem are considered necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the Park; are key to the natural or cultural integrity of the park; and/or are identified as a goal in the Park's Master Plan or other relevant NPS planning documents.

- **Geology and Soils** – Yellowstone National Park is about 2.2 million acres in size, 98 percent of which is undeveloped. This project will impact approximately 47,000 square feet (1.08 acres) of soils would be impacted by ground disturbing activities. Of this total amount of disturbance 35,000 square feet (0.8 acre) would be for construction of the new dormitory. The additional 12,000 square feet (0.28 acre) would be for construction of a parking lot for 65 vehicles. Other small areas of soil disturbance would occur where soils would be excavated for utility lines that may need to be repaired or replaced within the cabin area or near the new dormitory building. During excavation related to this project, a qualified geologist/hydrothermal specialist would have the opportunity to observe ground disturbing activities to increase the knowledge of soil types in the area, and offer mitigation measures that could lessen impacts to geology and soils. Additionally, mitigation measures such as topsoil salvage and replacement would be used to lessen impact to soils and allow for revegetation. Monitoring for noxious weeds would be done and treatments would be implemented if needed. Overall, direct and indirect impacts on geology soils will be adverse, localized, minor, adverse and short- and long-term and there will be no impairment to geology and soils.
- **Hydrothermal Resources** – Construction of the dormitory in the administrative area will not cause impacts to thermal resources because the area is not known to be currently hydrothermally influenced. Due to the dynamic nature of the Old Faithful area, hydrothermal assessments, as discussed in the *Mitigation Measures* section, will be performed prior to design to ensure appropriate considerations are made if the area is found to be hydrothermally active. Impervious surfaces such as those found on the walkway system that will be improved under this project, essentially disrupt the natural flow of water through the ground and cause increased amounts of water to flow immediately adjacent to these areas. This disruption to the natural flow of ground water and temperature changes due to additional impervious surface. Overall, Alternative B will continue to have short- and long-term, minor to moderate adverse impacts on the hydrothermal resources because it results in continued excavation for maintenance/repair of facilities and will maintain impervious surfaces thereby disrupting the natural flow of water and heat. However, these impacts will not result in impairment to hydrothermal resources.
- **Vegetation and Rare Plants** – The Old Faithful area has been intensively developed and has

isolated trees or small groupings of trees, with a sparse herbaceous understory. Depending upon the site chosen for construction of a new dormitory, up to 1.08 acres of lodgepole pine will be removed to clear the site for the dormitory and parking. The potential for proliferation of non-native plants is possible with any ground disturbance, and the potential for spreading non-native plant species during construction operations is a concern. Mitigation measures requiring contractors to adhere to proper construction techniques and precautions, including topsoil salvage and washing of equipment before entering the Park in order to eliminate any non-native plant seeds will be implemented. Reclamation and revegetation efforts would follow Yellowstone's policy on vegetation management for construction which also includes procedures for long-term management of non-native vegetation. Given that the effects on vegetation will be localized, direct, indirect, short-term, adverse, and minor there will be no impairment to vegetation.

- **Wildlife** – Development of the Old Faithful area has resulted in local degradation of wildlife habitat though a diversity of wildlife species still inhabits the area. An increase in overnight use by visitors due to the cabin repurposing and the construction of the dormitory will not have an impact on wildlife species in the area due to high human use that currently exists. The wildlife present within the immediate vicinity of most of the proposed activities are habituated to human activity. Adverse effects on these animals as a result of the activities proposed are generally expected to be negligible because of the high human activity that already occurs there. The species that use this area will likely be temporarily displaced by construction activity and equipment, but they will be expected to return following completion of the project. The NPS expects no increase in wildlife mortalities in this area because all construction activities will be short-term (temporary) and confined to the immediate project area. As with all Yellowstone construction projects, the NPS will direct the contractor to manage food and garbage so that they are not available to grizzly or black bears. Contractor staff will have to attend bear/food management orientation sessions and abide by the normal bear management guidelines. Minor, short-term, local, adverse impacts to Park wildlife will be expected to occur and therefore will not lead to impairment to wildlife.
- **Special Status Wildlife Species and Yellowstone Species of Management Concern** – Continued operations in the Old Faithful area will result in negligible effects (*"no effect"*) to the Canada lynx and a *"may effect, not likely to adversely affect"* the grizzly bear and gray wolf. Grizzly bears found within the Old Faithful developed area are hazed out of the area to reduce conflicts with humans. The nearest critical habitat for the lynx is approximately 15 miles east-southeast of the project area, there would be *"no effect"* on critical lynx habitat from this alternative. The trumpeter swan, bald eagle, peregrine falcon, and boreal toad are not known to regularly inhabit the project area but have the potential to exist in the project area. Any effects to these species will be negligible and short-term. Yellowstone sulfur wild buckwheat is found on drier obsidian sand in the Old Faithful area but not known to occur in the project areas. If discovered, mitigation measures will be taken to transplant specimens or to protect plants from trampling through the installation of vegetation barriers. With the implementation of mitigation measures listed in this EA, no impairment of special status species and Yellowstone Species of Management Concern will occur.
- **Historic Structures** – The Old Faithful Administrative Area is eclectic in style, predominately modern and not historically significant. It is visually separated from the Old Faithful Historic District so the construction of a new dormitory in this area will have no impact on historic structures. The repurposing of the Old Faithful Lodge Cabins to visitor use cabins will require repairs and up-grades to the interiors of the cabins. Over the years, the interiors of all 28 cabins have been altered, have lost integrity and do not contribute to the National Register eligibility of the exterior of the cabins. The exterior of the cabins will receive in-kind repairs where necessary.

For the purposes of Section 106 of the National Historic Preservation Act, this project will have "no adverse affect" and historic structures will not be impaired.

- **Cultural Landscapes** – Construction of a new employee dormitory and repurposing the cabins associated with the Old Faithful Lodge for visitor use, will have negligible impacts on the Old Faithful cultural landscape. The location of the proposed new employee housing is outside the boundary and viewshed of the documented cultural landscape and therefore will have no impact on the landscape. For the purposes of Section 106 of the National Historic Preservation Act, this is considered "no adverse affect" and no impairment to cultural landscapes will occur.

In conclusion, as guided by this analysis, good science and scholarship, advice from subject matter experts and others who have relevant knowledge and experience, and the results of public involvement activities, it is the Superintendent's professional judgment that there will be no impairment of Park resources and values from implementation of the preferred alternative.

Response to Substantive Comments

In some instances where there were multiple comments related to the same topic the comments are summarized. Where whole comments are included they are presented exactly as written.

Topic #1 Affected Environment: Vegetation

Comment 1-1: The National Park Service needs to do more than merely preserve existing native plants and trees in the Lodge area, for it is currently pretty trampled. The agency should require Xanterra (who I assume will be funding the renovations and construction in some capacity) to actively landscape the area, as it has done around Old Faithful Inn.

Response 1-1: Mitigation measures for revegetation and recontouring of disturbed areas would take place following construction. Revegetation efforts would strive to reconstruct the natural spacing, abundance, and diversity of native plant species. All disturbed areas would be restored as nearly as possible to pre-construction conditions shortly after construction activities are completed. Weed control methods would be implemented to minimize the introduction of noxious weeds. This project would follow Topsoil Retention/Vegetation Guidelines developed for previous projects within the park. Some trees in the area of the proposed dormitory may be removed. Existing vegetation at the site of the existing Old Faithful Lodge cabins would not be disturbed to the greatest extent possible. Contractors would be required to adhere to proper construction techniques and precautions, including topsoil salvage and washing of equipment before entering the Park in order to eliminate any non-native plant seeds. Reclamation and revegetation efforts would follow Yellowstone's policy on vegetation management for construction which also includes procedures for long-term management of non-native vegetation. Plant species used during reclamation would reflect the vegetation native and typical to the area.

Topic #2 New Alternative or Elements

Comment 2-1: There is no mention of the Columbine dormitory. If the proposed alternative is implemented, you will still have employees and employee buildings in the middle of the area used to house visitors. Why was there no discussion of removing (destroying or relocating) or repurposing the Columbine dormitory?

Response 2-1: The Columbine dormitory would remain for employee use and there have been no decisions for any future changes for this building. Relocating the employees from the existing cabins to the proposed dormitory helps to separate employees from the visitor use cabins. Future changes for the use of the Columbine dormitory could occur, though no changes have currently been proposed. If changes for the Columbine dormitory are proposed, future NEPA documents would be prepared.

Topic #3 Location of New Dormitory

Comment 3-1: Without having specifics regarding the design and location of this new building, how can one know whether it will actually be a suitable replacement for these employees?

Response 3-1: Figure 5 page 17 in the EA illustrates the two areas (Site A & Site B) where the new dormitory would be constructed. Regardless of the site selected for the construction, the dormitory would require an area of about 35,000 square feet (0.8 acre) for the building and grounds. The

building itself would have a footprint of about 12,000 to 15,000 square feet. The two areas that are being considered for construction of the dormitory are in the same area identified for this use in the 1985 DCP. If site A is selected, approximately 0.8 acre of mature lodgepole pine forest would be removed and less than 0.01 acre of mature lodgepole pine forest if site B is selected. The NPS feels either site selected would be a suitable site for a dormitory to serve as replacement for displaced employees.

Topic #4 Employee Housing

Comment 4-1: An employee dormitory should be in the Lodge/Snowlodge area not government area.

Response 4-1: Constructing a new dormitory in the government follows the plans of the 1985 Development Concept Plan for the Old Faithful area. The plan discussed construction of five dormitory buildings and two apartment units within the Old Faithful Administrative Area to increase the number of housing units for employees which were, and still are in short supply. The NPS feels a new dormitory is better suited in the government area and not in the Lodge/Snowlodge area to locate similar functions in the same area.

Comment 4-2: The Columbine Dormitory could be turned into a hostel type operation.

Response 4-2: Turning Columbine Dormitory into a hostel type operation is not being considered at this time. If future changes for the function of this building are proposed in the future, appropriate NEPA documentation would be prepared, and input from the public would be sought.

Comment 4-3: Many of the employees currently living in the cabins are managers, leads, long-time employees who do not want to live in a dormitory style space.

Response 4-3: Final design for the dormitory building would take into account the demographics of the workforce that would be using this building for housing. It is likely that some apartment-style units would be designed into the building.

Comment 4-4: What about the row apartments NP has by the trailer park and the spaces in the trailer park, are they all full in summer? Could they be utilized as alternative housing offering space and privacy?

Response 4-4: While there are multiplex apartments located within the administrative area near the employee trailer park, these units are full to capacity and would not provide room for any of the employees displaced by repurposing the Old Faithful Lodge Cabins. The trailer spaces are typically filled as well by volunteers with their own RV units, contractor trailers, or with NPS mobile homes.

Topic #5 Out of Scope

Comment 5-1: There is the issue of the OF Lodge Recreation Hall. It is an employee only facility right in the middle of guest areas. I think it could be brought back into the public use area by building a new employee rec hall over in the government service area. The old recreation hall could be used as a banquet and catering facility.

Response 5-1: While the Old Faithful Recreation Hall is located close to the project area, any changes in function are beyond the scope of this project.

Topic #6 Parking

Comment 6-1: If employees drive their personal vehicles from the dormitory area to the Lodge area, then there should be provided employee only parking and the employees should avoid parking in public parking areas.

Response 6-1: The distance from the government employee housing area is a little over a ½ mile and historically many employees choose to walk this distance to work. Even if some employees decided to drive from the housing area to work, there would not be a substantial number of increased vehicles to warrant separate parking designations.

Comment 6-2: Plans for increase in parking are not developed fully in document. The parking area, if performed in a visually sensitive manner, will be the greatest visual obstruction to this project.

Response 6-2: Parking is addressed on Page 14 in the EA. Construction of a lot that would serve approximately 65 vehicles would occur near the proposed dormitory building. Existing access roads are present within the Old Faithful employee housing area. It is assumed parking spaces would be constructed adjacent to these roads, and the road would become the maneuvering space for the lot. The only new disturbance would be from space needed for the vehicle spaces themselves. It is estimated that approximately 12,000 square feet (0.28 acre) of area would be needed for a capacity of 65 vehicles. The area for parking at the dormitory would be screened by existing vegetation and buildings from public view. Parking at the Old Faithful cabins would remain as is, no changes are proposed.

Topic #7 Visitor Use: Additional NPS & Concessioner Employees for increase in visitor use

Comment 7-1: The increase in guest numbers would require additional employees for the NPS law enforcement, interpretation and maintenance already stretched to the very limits.

Response 7-1: This increase could cause a potential change requiring up to eight additional staff in concessioner employee staffing especially for service such as housekeeping. It is not anticipated that this change in approximately 134 overnight visitors would require additional NPS staff.

Topic #8 Visitor Use: Impact of Proposal and Alternatives

Comment 8-1: There needs to be more dining facilities for the increased overnight guests

Response 8-1: Food services are addressed on Page 60 of the EA. The increase in visitors housed at the Old Faithful Lodge Cabins would have negligible impacts to other visitor services including food service facilities. The Old Faithful area hosts 6 restaurants ranging from fast food/deli to full service, and 2 general stores, the waiting time for services during peak season can be considerable. These food service facilities serve on average 7,250 meals a day between June 1 and September 15 making it the highest number of meals a day served in the Park. Adding approximately 134 overnight visitors would result in a negligible increase in the waiting time at these facilities.

Topic # 9 Affected Environment: Socioeconomics

Comment 9-1: You discuss the need for more affordable guest facilities in Yellowstone. How do you explain removing all the without baths from Lake Hotel back in the 80's? Or the new Snow Lodge which also removed less expensive options for Old Faithful visitors. Maybe a wing of rooms without bath would have been nice in both Lake Hotel and the new Snow Lodge for our less affluent guests.

Response 9-1: There have been many past actions which have led to reductions in the amount of affordable visitor lodging within the park boundaries. Many cabins were removed at Old Faithful to allow for construction of facilities that increased the lodging choices that visitors have within the park. The newer facilities often came with increased prices, thus reducing price range choices. Repurposing the Old Faithful cabins would help increase these price range choices by taking existing cabins and repurposing them back to their original visitor use intent. The hope is that the projects described within this EA will allow more choices of lodging type, and price to be offered to visitors in the Old Faithful area.

Comment 9-2: There needs to be assurance that the rates for these cabins do not increase each time improvements are made (as other lodging units in Yellowstone have done). To ensure affordability and a "range" of rates, the new concession contract should specify that rates at these units (determined at the beginning of the new contract) should only be allowed to increase with the CPI. In the past, a set percentage of lodging units were maintained at "budget" levels; now the average citizen is not able to afford lodging at Yellowstone and many other national parks.

Response 9-2: The National Park Service Concessions Management Improvement Act of 1998 states that concessions contracts "shall permit the concessioner to set reasonable and appropriate rates and charges for facilities goods and services provided to the public."

A concessioner's rates and charges are subject to approval by the National Park Service. As directed by the Act, the NPS determines the whether they should be approved (that is, whether they are reasonable and appropriate) primarily by conducting comparability studies. For example, the NPS compares a concessioner's proposed rate for a cabin to the rate for a similar cabin outside the park. If the proposed rate is lower or similar, it is approved. If it is higher, it is not.

It would be possible to establish a rate for the subject cabins in the next concession contract and state that the rate shall be increased or decreased annually according to the CPI. However, given that 1) it is clearly the intent of Congress that comparability is the method of choice for approving or disapproving rates, 2) comparable are plentiful, 3) comparability studies have historically been successful in ensuring appropriate rates, the NPS intends to continue use comparability for establishing all lodging rates in the park.

The NPS is committed to a policy that concessioners maintain "a reasonable proportion of their accommodations at low prices." It is relevant to note that in 2011, of the approximately 2,130 room in Yellowstone, 30% of them cost between \$50 and \$99 per night and 19% cost between \$100 and \$149.

Topic #10 Affected Environment: Visitor Use

Comment 10-1: Some cabins should be made handicap accessible, if possible.

Response 10-1: On Page 4 of the EA it addresses that a portion of the cabins would be made accessible as per the Americans with Disabilities Act, and the American Barriers Act.

Topic #11 Affected Environment: Visitor Conflicts

Comment 11-1: I live in the employee cabin area. I have helped countless guests find their way around the Old Faithful Area due to very complicated signage. I have also on numerous occasions witnessed **employees** assisting lost guests find their way even to the geyser itself. Spending time with an employee living and working in Yellowstone was a bonus not a nuisance.

Response 11-1: The EA does attempt to work towards a separation of overnight visitors and employee housing, recognizing that these two functions can at times conflict. Park management recognizes that employees within the area provide a valuable service in their off-duty time helping inform visitors, protecting park resources, and helping with education. The projects described within this EA attempt to meet multiple objectives that will benefit visitors, resources and employees.

Topic #12 Resource Concerns: General

Comment 12-1: Lacking the larger comprehensive picture about the intended future vision for the Old Faithful area, it is difficult to ascertain what the real overall consequences might be from this immediate decision.

Response 12-1: The proposal analyzed in the EA to construct a dormitory in the administrative area is consistent with the current long-range plan for the Old Faithful area (the 1985 DCP). The repurposing of the cabins is a change from that plan and the impacts of such action analyzed in the EA. A future comprehensive plan for the area has been initiated, but a completion date has not been determined. Park management feels that the proposals within the Old Faithful Cabin Repurposing and Dormitory Construction EA should not wait for the comprehensive plan to be completed. Implementation of the projects would have benefits for both park visitors and the cultural resources (cabins).

Topic #13 Relationship to Other Plans

Comment 13-1: Yellowstone announced in May, 2010 its intention to create a long range comprehensive plan for the Old Faithful developed area. It seems necessary that this long range plan first be vetted with the public, and approved, before launching into immediate modifications of the Old Faithful area that will be long-lasting and potentially at odds with long range plans. The Old Faithful Area Comprehensive Plan was described as addressing traffic circulation and visitor experience, both of which are directly associated with changing overnight accommodations. Because the EA does not express any reason for urgency for deciding on the cabin repurposing plan, the reader is left wondering why the present EA decision cannot await the overall, comprehensive look at development and visitor experience in the Old Faithful area. What is driving the need to decide now, perhaps just months or even a year, in advance of the larger comprehensive assessment of development at Old Faithful?

Response 13-1: A timeframe for the completion of the "Old Faithful Area Comprehensive Plan" (presently an incomplete internal draft) has not yet been finalized. Planning is an iterative process to keep improving the plan. Management proposes to allow the time needed to prepare a plan that will help protect resources and guide operations within the Old Faithful developed area for many years into the future. There are some short-term actions that have been analyzed and presented in the Old Faithful Cabin Repurposing and Dormitory Construction EA that were felt to have more immediate benefits for visitors, resources, and employees, through implementing sooner than later.