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

Finding of No Significant Impact
North Entrance/Park Street Improvement Plan

Background

In compliance with the National Environmental Policy Act (NEPA), the National Park Service prepared an environmental assessment to examine three alternatives and environmental impacts associated with the proposal to develop a plan to implement several modifications to the park's North Entrance Station and road corridor as well as parking areas encompassing Park Street, Gardiner Transportation Center, and the Roosevelt Arch.

Currently, the North Entrance Station is a single story log frame structure that functions as an Entrance Station, break room, restroom, office, storage space, fee processing area, visitor contact station, and duty location for employees. For the 2011 summer, interim measures were implemented to include the installation of a temporary 'shed' Entrance Station and reconfiguration of traffic patterns in order to decrease the time required to process visitors and address know safety concerns.

Along Park Street during peak use (June 1-September 30) the need for parking exceeds the capacity of the area, resulting in a highly congested mix of vehicles and pedestrians with no pedestrian crossings, vehicle controls or delineated oversize vehicle parking. At the Gardiner Transportation Center safety concerns in this area include the informal use of the service road as a primary exit for the North Entrance Station during peak use resulting in a highly congested area mixed with commercial operations, pedestrians, and visitor traffic. At the Roosevelt Arch designated pedestrian areas are not available to visitors resulting in a mix of pedestrians among inbound and outbound traffic. Informal parking has evolved on the shoulder of the 'hairpin' turn north of the Arch causing a bottleneck of vehicles during peak use.

This proposal is necessary to improve traffic flow and alleviate congestion issues during peak use as well as provide adequate facilities for park employees. Safer parking conditions and designated pathways along Park Street, the Gardiner Transportation Center, and Roosevelt Arch would also reduce exposure of visitors and employees to active traffic movement. By implementing the plan, there will be an improvement to visitor experience and access and as well to the safety of visitors and employees.

Selection of the Preferred Alternative

Three alternatives were evaluated in the environmental assessment including Alternative A (No Action), Alternative B (Operation/Traffic Configuration B), and Alternative C (Operation/Traffic Configuration C). Alternative C is the National Park Service's preferred alternative because it best meets the purpose and need for the project as well at the project objectives to:

1) develop the infrastructure necessary at the North Entrance Station to improve traffic flow and alleviate congestion issues during 'Peak Use' as well as provide adequate facilities for park employees ;

2) improve vehicular circulation and provide safer parking conditions along Park Street and the Gardiner Transportation Center, by reducing exposure of visitors and employees to active traffic movement;

3) improve visitor experience and aesthetics throughout the project area. Improve safety and access to the Roosevelt Arch through expansion of visitor parking, walkways, facilities and improvement of traffic and pedestrian flow; and

4) meet the needs of the plan while protecting the values and purposes for which YNP was set aside, especially those natural and cultural resources in the area of the North Entrance and Park Street.

Under Alternative C, actions proposed in this alternative will be implemented in phases and timed in order to minimize impacts to visitor experience and park operations.

North Entrance Station - A new North Entrance Station complex (two structures) reflecting the rustic architectural style of the area will be located approximately 500 feet to the northwest along the North Entrance Road (i.e. closer to the Roosevelt Arch). The main structure (maximum 2,000 square feet) will provide administrative space to accommodate employee's needs including, office space, restroom, break room, storage, security/telecommunication equipment, and mechanical room. The kiosk structure (approximately 500 square feet) will operate during periods of peak use. Both structures will include upgrades for accessibility, ergonomics, security, utilities and light pollution. Employee parking (4-6 vehicles) will be located in proximity to the North Entrance Station complex. A third lane may be added to the North Entrance Road to hold and process visitors. Changes in inbound/outbound traffic patterns will occur during peak use; this will allow for the operational flexibility necessary to meet changing conditions at the North Entrance Station.

Park Street - On the north side of Park Street, increased capacity for parking for automobiles and oversize vehicles will be designed. A pedestrian island including crosswalks, sidewalks, fencing, and points of entry into the parking lot will separate the parking lots and Park Street. The sidewalk system within the Park Street area will connect pedestrians to the Gardiner "Triangle" Pathway. Park Street will be shifted approximately 30 feet into the Gardiner "Triangle" and adjusted to accommodate traffic maneuvers and improve visibility at intersections, requiring the relocation of the existing iron fence.

Gardiner Transportation Center - To reduce congestion and address safety concerns the road through the Gardiner Transportation center will be relocated west approximately 40 feet into the Gardiner "Triangle". All commercial and employee parking will be located to the east of the Gardiner Transportation Center road, providing space to stage and maneuver oversize vehicles. Employees accessing their place of business will no longer be required to cross the main flow of traffic. Traffic entering via the Gardiner Transportation bypass road (service road) will be required to present a coded YNP gate pass to operate an automated traffic control gate at either entrance.

Roosevelt Arch - Under this Alternative, the configuration of roads around the Roosevelt Arch will allow management the operational flexibility necessary to adjust to changing conditions at the North Entrance Station and congestion at the 'hairpin turn.' Traffic through the Roosevelt Arch or Arch bypass road could be operated as a two-way or one-way road. Parking near the Roosevelt Arch will allow pedestrian access to the Roosevelt Arch and designated viewing areas. To facilitate pedestrian access and safety, the pedestrian portals of the Roosevelt Arch will be re-opened, allowing access through the Arch out of the travel lane. Elements constructed in proximity of the Roosevelt Arch including fencing, seating, walls, sidewalks and curbing will reflect the historic character of the area and aid in separating pedestrians from vehicles

Traffic Circulation - Visitors will continue entering Yellowstone National Park's (YNP) North Entrance Station by driving south on US Highway 89 from Livingston, Montana. Visitors will cross the official park boundary at the intersection of US Highway 89 and Park Street in Gardiner, Montana. Upon entry into YNP, signage will direct visitors west along Park Street towards the Roosevelt Arch. Employee and delivery traffic will be permitted to enter on the Gardiner Transportation road (a designated service road).

Seasonal Fluctuation in Visitation - To address fluctuations in visitation management strategies will adjust based on level of visitation. For example, traffic will be directed to exit differently during heavy visitation in the peak use season versus non-peak visitation. Seasonal dates and times are estimated.

Peak Use June 1-September 30, daytime hours (8am to 5pm)

Non-Peak Use October 1-May 31, including night time hours

Gardiner "Triangle" Pathway - The Gardiner "Triangle" Pathway will be a one mile long pedestrian pathway (universally accessible) extending around the perimeter of the Gardiner "Triangle" connecting Park Street, the Roosevelt Arch, Arch Park and points of interest in the area. Features associated with the pathway will include sidewalks, road shoulders, fencing, curbing, crosswalks, viewing platforms and interpretive panels.

Storm water Management - The existing roadways and parking areas will be re-graded and re-surfaced with asphalt, drainage features such as culverts and additional curbing will be added where necessary and located to avoid sensitive areas such as archeological sites. Where feasible, storm water will be controlled and directed into the Gardiner "Triangle" to infiltrate into the ground.

Utilities - Final design for North Entrance structures will be completed in collaboration with the NPS Telecommunications office to ensure effective housing of telecommunications equipment. Conduit containing both copper and fiber conductors will be buried between structures to provide service to all facilities to support video security, credit card machines, cash registers, land and mobile radio communications, intrusion/duress alarms, and telephones.
Other utilities (electric, water, and septic) will connect to existing underground utilities in collaboration with Gardiner representatives and utility companies. Reclamation of sites will be completed in accordance with the parks topsoil, re-vegetation, and non-native plant management guidelines.

Construction staging, materials and timing - The majority of construction activities will be scheduled and completed during the early spring and late fall, purposefully avoiding periods of high visitation. However, some activities will require that construction take place during periods of high visitation, therefore mitigation measures will be implemented to lessen the duration and impacts on local businesses, visitors, park operations and local residents. In order to minimize hauling, minimize potential for non-native plant introduction and reduce fuel consumption, materials and construction activities will be staged primarily within existing government operated pits located in the northern region of YNP.

Standards for the Treatment of Historic Properties - The Secretary of the Interior's Standards for the Treatment of Historic Properties will be utilized to guide the design process in this area to ensure the new structures blend with the current setting. Consultation with Montana State Historic Preservation Office (MSHPO) and the Advisory Council on Historic Preservation along with

adherence to the Secretary of Interior's Standards will guide the designs associated with the Roosevelt Arch.

Mitigation Measures

- Temporary impacts, such as soil and vegetation disturbance and the possibility of soil erosion, associated with the construction of improvements will occur. In an effort to avoid introduction of non-native plant species, no hay bales will be used. Hay often contains seed of undesirable or harmful alien plant species. Therefore, on a case-by-case basis the following materials could be used for any necessary erosion control: wood bark mulch, clean straw, sand bags, and silt fences. Wood bark mulch may be used to help retain soil moisture and promote seed generation of native plants. Standard erosion control measures such as silt fences and/or sand bags would be used to minimize any potential soil erosion.
- Although soil side-cast during construction will be susceptible to some erosion, such erosion will be minimized by placing silt fencing around the excavated soil. Excavated soil may be used in the construction project; excess soil would be stored in approved areas.
- Construction will take advantage of previously disturbed areas wherever possible. Vegetation impacts and potential compaction and erosion of bare soils will be minimized by the following; the use of conserved topsoil would help preserve micro-organisms and seeds of native plants. The topsoil will be re-spread in as near as original location as possible, and supplemented with scarification before placement, mulching, seeding, and/or planting with species native to the immediate area. This will reduce construction scars and erosion.
- Should construction activity unearth previously unknown historic or prehistoric cultural remains or artifacts, work will be stopped in the area of the discovery and the park archeologist will be notified. The cultural remains will be assessed and Montana SHPO notified. If the cultural remains are assessed as significant and retain integrity for the archeological information they may provide, the site will be avoided and protected. If avoidance is not possible, data recovery excavations will be conducted prior to any construction activity resuming in the area. If YNP, with the concurrence of the Montana SHPO, determines the archeological remains are not sufficient to meet the definition of a site, or the archeological information within the site is not significant, all cultural remains will be collected and construction activity may commence with archeological monitoring.
- The Park Service will ensure that all contractors and subcontractors are informed of the penalties for illegally collecting artifacts or intentionally damaging archeological sites or historic properties. Contractors and subcontractors will also be instructed on inadvertent discovery procedures to follow in case previously unknown archeological resources are uncovered during construction. Equipment and materials staging areas and material extraction areas would also avoid known NR eligible archeological resources.
- Non-contributing areas of the NR eligible sites 24YE198/118 where construction activities will be permitted would be identified through subsurface excavation and other techniques prior to final design or construction disturbance. Montana SHPO concurrence to the non-contributing areas would be required prior to construction staking.
- Contractors will coordinate with park staff to reduce disruption in normal park activities. Construction workers and supervisors will be informed about the special sensitivity of park values, regulations, and appropriate housekeeping.
- To minimize the amount of ground disturbance, staging and stockpiling areas will be in previously disturbed sites, away from visitor use areas to the extent possible. All staging and stockpiling areas would be returned to pre-construction conditions following construction.
- Sensitive resource areas will be identified and fenced with construction tape, snow fencing,

or some similar material prior to any construction activity. The fencing would define the sensitive resources in 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 would be instructed to avoid conducting activities beyond these areas as defined by the fencing or markers.

- Re-contouring of disturbed areas will take place following construction and will be designed to minimize the visual intrusion of the structure. All disturbed areas will be returned as nearly as possible to pre-construction conditions shortly after construction activities are completed. Because non-native vegetation prevails in the project area, revegetation efforts may not be successful. If revegetation were attempted, efforts will strive to reconstruct the natural spacing, abundance, and diversity of native plant species using native species. Weed control methods will be implemented to minimize the introduction of noxious weeds.
- Fugitive dust generated by construction will be controlled by spraying water on the construction site, if necessary.
- To reduce noise and emissions, construction equipment will not be permitted to idle for long periods of time in areas near residential areas.
- To minimize possible petrochemical leaks from construction equipment, the contractor will regularly monitor and check construction equipment to identify and repair any leaks.
- Construction workers and supervisors will be informed about special status species. Contract provisions will require the cessation of construction activities if a species were discovered in the project area, until park staff re-evaluates the project. This will allow modification of the contract for any protection measures determined necessary to protect the discovery.
- All project-related employees, such as contract and government construction employees will be given orientation on how to avoid disturbing or encountering bears, wolves, coyotes and other animals that could become habituated and how to minimize unavoidable effects or encounters. Orientation will include information about park regulations regarding food storage, disposal of garbage and other bear attractants, and approaching or harassing wildlife.
- To minimize the potential for impacts to park visitors, variations on construction timing may be considered. One option includes conducting the majority of work during off-peak times of the day or during shoulder seasons. Another option includes implementing daily construction activity curfews such as not operating construction equipment near residences and hotels between the hours of 6 PM to 7 AM in summer (May – September). The NPS will determine this in consultation with the contractor. Visitors will be notified of construction activities and possible traffic delays through the park newspaper, news release, and in visitor centers and Entrance Stations.
- According to 2006 *Management Policies*, the NPS willstrive 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. To the 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. Energy efficiency is incorporated into the decision-making process during the design and acquisition of buildings, facilities, and transportation.

Alternatives Considered

Three alternatives were evaluated in the environmental assessment including the No-Action Alternative and two Action Alternatives. Under Alternative A, No-Action, the proposed improvements would not occur. Alternative B (Operation/Traffic Configuration B) would allow for the minimum level of action necessary to address problem areas and issues identified during peak use times. Under Alternative B, a second kiosk (similar in scale and style to the existing) would be located to the northwest of the existing North Entrance Station. The new kiosk would include upgrades for accessibility, ergonomics, functionality, security, utilities and light pollution. Administrative functions for the North Entrance Station would be located in a separate building (maximum 2,000 square feet), located to the northeast of the North Entrance Station. The new structure would consist of administrative space to accommodate employee needs including office space, restroom, break room, fee processing area, storage, security / telecommunication equipment, mechanical room and parking (4-6 vehicles). Parking configurations for both Park Street and the Gardiner Transportation Center would be similar to Alternative C except access along the Gardiner Transportation Center road would not be controlled by coded gate access. While a pedestrian pathway and improved parking would occur around the Roosevelt Arch, an Arch bypass would not be built under Alternative B to alleviate the amount of traffic passing through the Arch.

Environmentally Preferred Alternative

The environmentally preferred alternative is the alternative that will promote the national environmental policy as expressed by §101 of the National Environmental Policy Act. This includes alternatives that:

(1) fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;

(2) assure for all generations safe, healthful, productive, and esthetically and culturally pleasing surroundings

(3) attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;

(4) preserve important historic, cultural and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice

(5) achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities; and

(6) enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

Alternative C is the environmentally preferred alternative because it best addresses these six evaluation factors. Alternative C best provides a long term solution that will ensure future generations an enjoyable and safe experience when visiting Gardiner, the Roosevelt Arch and the North Entrance area. Alternative C best provides a working environment for park staff with least risk to health and safety. Alternative C provides the widest range of beneficial uses by not only alleviating congestion and improving safety, but also by providing the best means to safely visit the Roosevelt Arch. The improvements will preserve important historic, cultural and natural aspects, while providing a better functioning entrance experience for visitors with much less oversight of visitor circulation; less impacts to employees, visitors and local businesses; and minimized environmental impacts; therefore achieving a balance between population needs and resource use

to permit high standards of living and a wide sharing of life's amenities. Mitigation measures in place will ensure best practices for sustainability and re-use of renewable resources.

Why the Preferred Alternative 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 preferred (selected) alternative will result in some adverse impacts; however, the overall benefit of the project, particularly to visitor experience and health and park operations, outweighs these negative effects. The adverse impacts are summarized as follows. Excavation and other ground disturbance activities will alter topography, geology, and soils in the project area to a minor degree (approximately 4 acres of disturbance primarily in existing developed footprint). Minor impacts to vegetation and special status plant species will result from removal of ground cover from construction activities leading to an increase in suitable stratum for establishment of non-native vegetation. Potential displacement and permanent removal of habitat may have a minor to moderate impact to wildlife including special status wildlife species and Yellowstone species of management concern. Improvements will be designed to avoid prehistoric and historic resources and will be finalized in consultation with the Montana State Historic Preservation Office leading to localized, indirect, minor impacts. Minor, short-term adverse impacts to visitor use and experience will result from potential construction delays.

The overall benefit of implementing the preferred (selected) alternative is that topography, geology, and soils and vegetation and special status plant species will be improved to a minor to moderate degree because of a reduction in water erosion because of improvements to storm water drainage. Changes to the North Entrance including the Arch bypass road would benefit visitor use and experience by providing for less congestion and better organization of traffic circulation. Pedestrian access improvements around the Arch would provide beneficial impacts by reducing trampling and erosion. Parking along Park Street and near Roosevelt Arch would be increased in size and better organized, leading to better route finding and reduced safety concerns. Improvements would have beneficial economic impacts on the community of Gardiner, Montana because of enhanced access to many of the downtown businesses. Further, the improvements will ensure that park operations have a functional administrative infrastructure and allow Entrance Station staff to operate the North Entrance road as a one-way or two-way road.

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 Entrance Station employees that will regularly use the new North Entrance Station Complex. The new entrance station complex will accommodate employee's needs for office space, restroom, break room, storage, and security and telecommunication equipment. The kiosk structures would include upgrades for accessibility, ergonomics, security, and utilities. At the Gardiner Transportation Center, employees will not be mixed with visitor traffic.

Under the preferred alternative, both employee and visitor health and safety will be improved by the delineation of parking spaces and the reconfiguring of vehicular traffic will alleviate existing safety hazards. Visitor safety will also be enhanced due to designated pedestrian walkways for visitors accessing downtown businesses and Roosevelt Arch. Improvements to storm water deficiencies will affect employee/park operations safety by reducing slipping hazards during rain and ice events. Overall, effects on the health and safety of employees and visitors will be long-term, local, moderate, and beneficial. Implementation of the preferred alternative will ensure that

existing health and safety issues are addressed, and resultant impacts will be beneficial and moderate in intensity.

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 preferred alternative will not impact unique characteristics of the area including prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas because these resources do not exist in the project area. The preferred alternative will ensure the unique characteristics of the Roosevelt Arch will be safely visited and the visitor experience surrounding the Arch and the adjacent Arch Park will be improved.

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

There are no highly controversial impacts anticipated to the quality of the human environment. Public scoping and comment on the proposal did not indicate any contentious issues and the EA did not identify significant impacts associated with the preferred alternative.

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 under the preferred alternative. The proposal involves improving conditions in a way that enhances visitor experience while providing a safe, healthy, functional, and efficient working environment for park and concession employees. Actions proposed under the preferred alternative 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 preferred alternative 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 environmental assessment 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.

The actions proposed under EA will involve only minor adverse effects to historic properties. Any and all designs and implementation actions will conform to Secretary of Interior Standards for Treatment of Historic Properties, therefore minimizing the degree of adverse effect.

YNP has entered into a Programmatic Agreement with the Advisory Council on Historic Preservation, the Wyoming State Historic Preservation Office (SHPO), and the Montana SHPO to streamline the Section 106 consultation for the principal park road system improvements under which a portion of the North Entrance project will fall.

The cultural landscape evaluation is in process. A cultural landscape inventory (CLI) is being finalized and the Montana SHPO has been notified the CLI will be submitted for eligibility concurrence. Given the amount of documentation completed for the cultural landscape it is possible to identify which features and characteristics will potentially contribute to the eligibility and therefore analyze impacts to those features. Until determination of eligibility using National Register standards takes place, the cultural landscape will be considered eligible and NPS will proceed as if eligible. Site specific Section 106 consultation will take place after determination of eligibility and prior to any actions being undertaken.

Improvements to the parking areas and pedestrian circulation patterns near the Yellowstone Park Transportation Historic District and the Roosevelt Arch National Historic Landmark and the cultural landscape fall within the standard procedures outlined in Section 106 of the National Historic Preservation Act. Preliminary consultation and concurrence of no adverse effect on the planning concepts of the whole project has been completed and received from the Montana SHPO (concurrence received August 3, 2011) and inquiries concerning the project from the Wyoming SHPO have been addressed. Final consultation of effect of the North Entrance project will be conducted through subsequent site-specific consultations as actions are designed more fully.

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.

In 2008, the NPS contacted the U.S. Fish and Wildlife Service with regards to federally listed species for the *Parkwide Road Improvement Plan* which included the North Entrance Road. A biological assessment was prepared by the park, and a subsequent biological opinion was issued on January 21, 2009 by the U.S. Fish and Wildlife Service. The parkwide biological assessment and biological opinion for the entire parkwide road plan allowed for a "take" of two wolves in any given year and a "take" of six bears in a consecutive three year period. While this project is a component of the overall *Parkwide Road Improvement Plan*, it would not have the same degree of impact and the impact would be less. Section 7 determinations of effect for this project on Threatened and Endangered Species are "no effect" to Canada lynx and "may affect but not likely to adversely affect" for grizzly bears and gray wolves.

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.

Impairment

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. NPS 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 NPS 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 NPS the management discretion to allow certain impacts within park, that discretion is limited by the statutory requirement that the NPS 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 M{S manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of these resources or values. An impact to any park resource or value may, but does not necessarily, constitute an impairment, but an impact would be more likely to constitute an impairment when there is a major or severe adverse effect upon 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 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 NPS 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 would have major (or significant) effects.

Impairment findings are not necessary for visitor use and experience, socioeconomics, 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: topography, geology, and soils; vegetation; wildlife; threatened/endangered and species of concern; historic and prehistoric archeological resources; historic structures; and cultural landscapes. Fundamental resources and values for Yellowstone National Park are identified in the *Master Plan* and *Foundation Statement.*

- **Topography, Geology, and Soils** – Yellowstone National Park is about 2.2 million acres in size, 98 percent of which is undeveloped. This project will impact about 4 acres of land adjacent to the roadway through widening. To minimize effects to this resource, mitigation measures will be implemented such as topsoil replacement, native vegetation replacement in areas with existing native vegetation, and noxious weed treatments to reduce impacts of disturbance. Overall, direct and indirect impacts on topography, geology, and soils will be adverse, localized, and minor; beneficial impacts will be short and long-term, localized, and minor to moderate because erosion potential would be decreased. Given adverse impacts are minor and short-term there will be no impairment to topography, geology, or soils.
- **Vegetation** – As described above, the project will impact about 4 acres of vegetation adjacent to the roadway. To minimize effects to this resource, mitigation measures will be implemented such as topsoil replacement, native vegetation replacement in areas with existing native vegetation, and noxious weed treatments to reduce impacts of disturbance. Overall, direct and indirect impacts of Alternative C on vegetation will be adverse, localized, and minor; beneficial impacts will be short- and long term, localized, and minor to moderate due to reduction in erosion. Given adverse impacts are minor and short-term there will be no impairment to vegetation.
- **Wildlife** – Yellowstone National Park has an abundance of wildlife within its 2.2 million acres. Short and long-term direct effects will include potential temporary displacement during construction activities and permanent removal of approximately 4 acres of wildlife habitat including reduction in space for wildlife movement. Displacement or stress to wildlife will occur during construction and times of peak use in the busy visitor season. Given the localized and temporary nature, impacts will be short- and long-term, adverse and minor to moderate and therefore will not lead to impairment to wildlife.
- **Special Status Species** – Yellowstone National Park is home to the federally listed Canada lynx, a portion of its designated critical habitat and grizzly bear. The gray wolf remains under the protection of the Endangered Species Act in the state of Wyoming as well. An additional entrance station kiosk, as well as other improvements to increase efficiency will have very little effect on federally listed or special status species. Road alignments will remain the same and no change in speed limits would occur. No loss of habitat currently used by threatened or endangered species within the park will be lost. While impacts to wolves and grizzly bears could occur, they will be considered negligible. The project is outside any lynx analysis unit and Canada lynx will not be affected. With the implementation of conservation measures from the USFWS biological opinion, and mitigation measures listed in this EA, no impairment of special status species will occur.
- **Historic and Prehistoric Archeological Resources** – Yellowstone National Park has had continuum of human habitation for 11,000 years. As such, thousands of historic and prehistoric sites exist, many un-surveyed as yet. Given the two known archeological sites in the

project area will be avoided and/or sub-surface testing would be conducted prior to any disturbance leading to project design that reflects avoidance of any significant cultural features in consultation with MT SHPO, impacts will result in indirect, local, short-and long-term minor adverse impact to the NR eligible historic and prehistoric components of the documented archeological sites. For these reasons, historic and prehistoric archeological resources will not be impaired.

- **Historic Districts and Contributing Structures** - Impacts to the historic structures mainly involve widening of the road within the North Entrance Road Historic District, improvements to drainage impacting the road base in some areas, and reduction of congestion on road surfaces during the busy summer months. The Arch bypass will reduce the amount of traffic through the Arch and therefore the Roosevelt Arch will be less affected by oversized RVs passing through the Arch without adequate space. Parking in the vicinity of the Arch and more pedestrian viewing opportunity will allow for reduction in trampling of the landscape around the Arch by visitors wishing for a photograph or a closer view leading to reduction in erosion around the Arch. Therefore the impacts on historic districts and contributing features will be direct and indirect, local, short- and long-term, minor and adverse, but also indirect, long-term, minor to moderate and beneficial. For these reasons, historic districts and contributing structures will not be impaired.

- **Cultural Landscapes** – Within the project area, the changes proposed to the cultural landscapes of the three historic properties will not diminish the integrity of setting. Therefore the project would result in minor long-term adverse impacts to cultural landscape characteristics and no impairment to cultural landscapes will occur.

In addition, mitigation measures for these resources will further lessen the degree of impact to and help promote the protection of these resources. Park Service staff will monitor all reconstruction and rehabilitation activities to minimize potential damage to any of the park resources discussed above.

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.

Public Involvement and Native American Consultation

Public scoping was conducted to inform the public about the proposal to improve pedestrian and vehicular circulation, visitor experience, improve storm water management, local business access, orient visitors at the North Entrance, Roosevelt Arch, and Park Street, and to generate input on the preparation of the alternatives. The scoping letter dated May 19, 2010 was mailed to more than 320 individuals, organizations, federal and state agencies, affiliated Native American tribes, local governments, and local news organizations. During the 30-day scoping period, 52 public responses were received which included approximately 130 comments.

On July 14, 2011, the environmental assessment was posted on the NPS PEPC website at http://parkplanning.nps.gov/ and available for public review and comment for a 31-day period ending August 13, 2011. To notify the public of this review period, a letter was mailed to Native American tribes and interested parties. A press released was also sent out by the parks Public Affairs Office. A total of 78 responses were received with the majority of the comments relating to

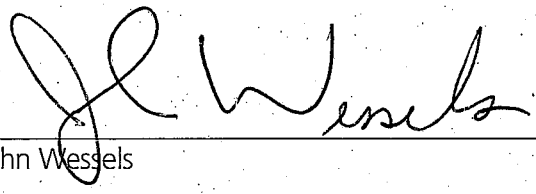
the need for public restrooms. Other comments were related to parking, resource and safety concerns, visitor experience, and timing of construction.

Conclusion

As described above, the preferred alternative does not constitute an action meeting the criteria that normally require preparation of an environmental impact statement (EIS). The preferred alternative 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, the National Park Service has determined that an EIS is not required for this project and thus will not be prepared.

Approved:



10/13/11

John Wessels

Regional Director, Intermountain Region, National Park Service Date

Errata Sheets

North Entrance/Park Street Improvement Plan
Yellowstone National Park

Text Changes in the Environmental Assessment

Page 109, Agency Consultation – The 2nd sentence shall indicate concurrence for Section 7 compliance, "A biological assessment was prepared by the park, and a subsequent biological opinion was issued on January 21, 2009 by the U.S. Fish and Wildlife Service".

Page 109, Agency Consultation- The last sentence of the 1st paragraph will be removed. This was an incorrect addition to the EA.

Page 110, Agency Consultation- Change the Montana State Historic Preservation Office concurrence date to August 3, 2011.

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 Improved Circulation and Parking

Comment 1-1: Impact on NPS/Xanterra housing residents: Will the addition of pull-in parking spaces directly in front of one house (currently parking is across the street) and 3 new spaces between the houses negatively impact the residents in these houses?

Response: The NPS intention to designate residential parking in front of the historic Gardiner housing is perceived as beneficial, providing resident's safer access to parking by eliminating the need to cross the main flow of traffic on the Gardiner Transportation bypass road. Parking between the houses has previously been organized informally by the assigned residences, the intention of the maps as shown in the EA is to delineate and maintain the parking as informal and for residences only.

Comment 1-2: Will you please look at the safest way to mark the parking spaces on Park Street. Right now it seems very unsafe to back out into traffic on that street. Perhaps angled parking spaces would work better.

Response: Parking along Park Street has been identified in the purpose and need of the project. In the preferred Alternative C, separate oversize vehicle parking and the re-location of Park Street south into the Gardiner Triangle will separate the majority of through traffic from the store front parking lot. In addition to reducing the amount of through traffic, the parking lot would be widened to improve the ability of users to negotiate parking and backing.

Comment 1-3: I like the idea of moving Park St and feel it really shows a sense of how important Park St. businesses are to our community. I think the access all works well, but would like to see (if possible) the large vehicle parking somehow created differently. As it is, it will be a wall of RVs and buses, blocking views of Park St businesses from the main drag. If they park on the park side (next to the fence) the same thing happens where there's a wall of vehicles 10-12 feet high. Is there a way to have them park side by side, nose-in facing the park in one section to alleviate the wall? Perhaps in front of the Town Café where many park now and it doesn't affect a visitor's first view of the park?

Response: The changes to Park Street parking are intended to improve the viewshed from Park Street by redesigning the parking directly in front of the businesses. This area currently lacks delineated parking, pedestrian crossings and is congested with a mix of vehicles and pedestrians. In both Alternative B and C, there are designated parking spaces for RV's and buses. The park recognizes that all traffic including RV's and buses could temporarily be viewed as part of the fore ground into Yellowstone National Park. However, due to the constant turnover of vehicles and distance from the store fronts, long term impacts to the middle and back ground are considered intermittent and minimal.

Topic #2 Entrance Station Operations

Comment 2-1: In Plan B, there is no chance of charging the entrance fee for outbound visitors who entered the park before a particular gate was open, such as the North Gate itself, because of the design (EA page 30).

Response: The NPS recognizes this as a deficiency of alternative B, however, it was determined the benefits to circulation and safety outweigh the negative impacts of missing the revenue from this small percentage of visitors who exit the park without paying the entrance fee. Alternative B was not chosen as the preferred alternative.

Topic #3 Facility Improvement

Comment 3-1: Many comments questioned why restrooms were not addressed in the EA. *Representative quotes*: Public restrooms should be added to the Park plan. Include restrooms! My family and I came through Gardiner last year, and were desperate to find a public restroom. There was none! Please include. Shouldn't a restroom be included? Please build one.

Response: The NPS is working collaboratively with Park County, Montana, Gardiner Chamber of Commerce, and the Greater Gardiner Community Council to develop a sustainable solution for restrooms within proximity to the project area.

Comment 3-2: Consider creating in the "Gardiner Triangle" an official "Resting Stop area" for all visitors coming & leaving the park. This should include: Good Restrooms, Water, Picnic areas's, Dog park, informational displays & Maps about the park, large parking area.

Response: The NPS is working collaboratively with Park County, Montana, Gardiner Chamber of Commerce, and the Greater Gardiner Community Council to develop a sustainable solution for restrooms within proximity to the project area. Arch Park located adjacent to the Roosevelt Arch currently allows for pets to be off leash and requires that owners clean up after their pets. A picnic area also exists at Arch Park. Water is not readily available within the project area. Under both Alternative B and C parking would be improved in the Park Street area as well as interpretive panels. The Yellowstone Association building along Park Street has several informational displays and maps of the park. Upon entering the North Entrance Station a park newspaper along with a park map is given to each visitor.

Topic #4 New Ideas (Arch Parking, Access through Gate, Visitor Center, Shade Structures, Deck, Park and Picnic Area adjacent to the Arch, Visitor Numbers, Rock Retaining Wall

Comment 4-1: Archway Park and Picnic Area, Provide a Museum/Bathroom in the Center of the Triangle, and Parking Area RV Parking with Sidewalk and Boulevard/Boardwalk.

Response: Arch Park provides a park and picnic area. A museum/bathroom in the center of the triangle is not considered appropriate because it would divide an area known to accommodate migrating wildlife in a way that would not allow enough space for wildlife to graze without crossing traffic. The NPS is working collaboratively with Park County, Montana, Gardiner Chamber of Commerce, and the Greater Gardiner Community Council to develop a sustainable solution for restrooms within proximity to the project area.

Also, this design would not effectively improve traffic flow and would move visitors away from Gardiner businesses. The NPS believes Alternative C will provide adequate parking for oversize vehicles as well provide pedestrian crossings and walkways.

Comment 4-2: Out in the open field between the arch and the existing entrance gate some sort of small scale visitor center could be built.

Response: A visitor center in the center of the triangle is not considered appropriate because it would divide an area known to accommodate migrating wildlife in a way that would not allow enough space for wildlife to graze without crossing traffic. Also, this design would not effectively improve traffic flow and would move visitors away from Gardiner businesses.

Comment 4-3: Add a small median with vegetation to the main traffic flow proposed on Park St. to slow traffic.

Response: The NPS will take this idea into consideration.

Comment 4-4: What about excavating into the hillside to the right of the present entrance to add a third kiosk? That might eliminate confusion of people approaching from left side and being behind the kiosk.

Response: In order to accommodate a third kiosk and associated traffic lanes significant earthwork would be required which would impact sensitive resources and add to the congestion around the North Entrance.

Comment 4-5: I have seen plans where a deck extending from the hairpin turn into the part of Arch Park owned by the Park. That would be a very suitable solution and a great addition to the many ways people can enjoy the park. For an example, I recommend the plans developed in 2007 by Rick and Mary Lee Reese of Bozeman, Montana. I think funds for the construction of such a deck could be found within the Gardiner community and other sources. I would welcome interest from the park superintendent in exploring this option.

Response: The NPS believes the widening of the roadway and the sidewalk leading to Arch Park and Roosevelt Arch will be a suitable solution and a great addition to the way in which people will enjoy Arch Park. A deck extending from the 'hairpin turn' could lead to vehicles stopping in this area and people crowding which may lead to increased safety concerns.

Comment 4-6: The road from Park Street through the arch could be widened by building a rock retaining wall along Arch Park. This wall would serve two purposes. One, there would be space for arch parking and traffic. Two, the retaining wall would serve to frame the arch park. I believe by framing the arch park it would be easier for the many events held there to charge patrons attending such events. Currently when an event is held their patrons can just wander down the hill and avoid paying and admission. The wall could be build from similar materials as the arch and arch wall making it fit in with the surrounding area.

Response: The NPS is working with the Community of Gardiner, Gardiner Chamber and Park County to develop plans for the future of Arch Park.

Comment 4-7: I think that parking should also be included on the front side of the arch so that those who want just a quick pic or are handicapped are able to get out of their car and look at it

from the front side... rather than parking on the backside and then having to walk to the front side to take pictures.

Response: Parking and congestion around the Roosevelt Arch has been identified in the purpose and need of the project. The objectives shown in the preferred alternative C, users will be encouraged not to stop on the hairpin turn but rather walk from Park Street, Arch Park or the Arch parking. Pathways will be constructed to provide safe and accessible pedestrian walk s to the view the Arch. Parking on the front side of the Arch would be problematic due to the topography and engineering requirements necessary to construct parking spaces which do not impede the flow of traffic.

Topic #5 Pedestrian Safety, Sidewalks, Crossings, Pathways, Surfaces, and ADA Compliance

Comment 5-1: Speed bumps or cobblestone would slow traffic turning off 89 into parking on front of stores.

Response: The NPS will take this idea into consideration.

Topic #6 Resource Concerns (Wildlife, Viewshed, Nightsky, Cultural)

Comment 6-1: Reconsider whether the wrought iron fence detracts from or adds to the park's entry setting. While the fence may have some historic standing, we suggest reconstructing the fence with stone or other materials more in keeping with the design of the Arch. The iron fence at present seems like a rickety, leaning and generally decrepit first image for park visitors.

Response: Removal of the fence would require consultation with Montana State Historical Preservation Officer to determine impacts and mitigations.

Comment 6-2: Might need a cattle guard at new 3rd St cut off to keep bison from taking new routes through downtown.

Response: The project area is located in a natural wildlife movement corridor therefore; the NPS would not limit direct wildlife movements.

Topic #7 Safety Concerns

Comment 7-1: Plan B requires delivery trucks from the service road-and all service road traffic-to merge with inbound traffic on their blind, off-hand side. This would actually be creating more risk. Plan C would require inbound service road traffic to make a left-hand turn into inbound visitor traffic. Visitors are likely to be shuffling through park literature handed to them at the kiosk while rolling along. Park employees, delivery trucks, and contractors are apt to be in a hurry on their way to work. This creates an atmosphere ripe for traffic accidents because of the eternal cross-over and the inevitable left-hand turn. There is no mention of any deaths or serious injury in the EA either at the arch or along Park Street, therefore the 'arch jam' is no different in risk than any other traffic jam in the park, therefore this area needs no special attention/design than any other place in the park.

Response: The NPS believes this design will not create more risk as employee and delivery traffic merge from the Gardiner Transportation road with visitor traffic from the North Entrance road because traffic from this road would have a clear non-obstructed view of traffic entering from the Entrance Station. Fortunately there have not been any deaths or serious injuries in the project area. "Near misses" are common during peak season.

Comment 7-2: It would be helpful to reveal the estimated budgets impacts of the alternatives given ongoing national hysteria about federal spending and deficits. What is the comparison in cost between Alternatives B and C, what are the most expensive elements, and does that strongly dictate desired elements in a preferred alternative in terms of actually seeing work accomplished on the group. YNP has conducted numerous planning efforts over the decades that never resulted in on-the -ground implementation, in many cases owing to costs.

Response: Final cost estimates for Alternative B and C have not been completed; however cost is a major consideration for all NPS projects and will continue to be evaluated. While it is true that some never see fruition due to budgetary changes, completing a thorough planning process early on allows decisions to be based on what is best for the resources, visitor experience, and park operations.

Topic #8 Timing of Construction

Comment 8-1: What specific impact might there be on the Park Street businesses? At best, peak season for visitors to the Park runs from mid-May through the end of September. This short season necessitates businesses to operate at full capacity and capability during these times in order to maximize revenues. While we understand that winter weather conditions may prohibit road construction, the business community of Gardiner would greatly appreciate it if an extra effort were made to prevent street closures and traffic re-routing during this peak season.

Response: The majority of construction activities would be scheduled and completed during the early spring and late fall, purposefully avoiding periods of high visitation. However, some activities would require that construction take place during periods of high visitation, therefore mitigation measures would be implemented to lessen the duration and impacts on local businesses, visitors, park operations (NPS and concessions) and local residents (EA Page 28). YNP anticipates working with the community and business owners of Gardiner, MT to minimize impacts.

Comment 8-2: The proposals indicate that construction of this project would be scheduled during the shoulder seasons to minimize impact during times of high visitation. Please be aware that the "spring" shoulder season is by far the busiest time for the HR building and a very high number of deliveries to the warehouse areas. In contrast, this area is much less busy during the late summer and fall shoulder season.

Response: The NPS will take this into consideration. However, some activities may require that construction take place during this time. To help lessen this impact, mitigation measures would be implemented to minimize the duration and impacts on local businesses, visitors, park operations (NPS and concessions) and local residents (EA Page 28).

Topic #9 Visual Concerns

Comment 9-1: Please ensure that the areas in front of the HR/YPSS/Transportation building and any new medians be landscaped in a natural way that allows them to appear natural, attractive, and in need of minimum care and that any hardscaping blends in with materials used throughout the project.

Response: NPS will consider elements such as these for landscaping and hardscaping.

Topic #10 Visitor Experience

Comment 10-1: Where are the visitor complaints in the EA? All I find are references to employee complaints.

Response: The North Entrance Station staff has received verbal complaints from both visitors and Gardiner residents about Park Street and the Entrance Station. No written comments have been submitted.