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

Finding of No Significant Impact
Isa Lake Bridge Reconstruction

Background

In compliance with the National Environmental Policy Act (NEPA), the National Park Service (NPS) prepared an Environmental Assessment (EA) to examine various alternatives and environmental impacts associated with the proposal to reconstruct the Isa Lake Bridge located atop Craig Pass in Yellowstone National Park. A 2010 bridge inspection report, prepared by the Federal Highway Administration (FHWA), determined the existing wooden bridge, built in 1942, is in poor condition and recommended replacement.

The proposal to reconstruct the Isa Lake Bridge is needed, in part, to address bringing the bridge up to current bridge design standards, increasing vehicle load capacity of the bridge, improving safety of the bridge and adjacent parking and pullout areas, maintaining visitor access on this section of the Grand Loop road into the future, and preserving the historic integrity of the Grand Loop Road and the visual historic integrity of the Isa Lake Bridge.

The bridge will be reconstructed using modern construction techniques, while retaining the historic character of the bridge. Reconstruction will address the numerous structural flaws that cause severe deflection when used by heavy vehicles or loads. A reconstructed bridge will minimize health and safety risks and ensure visitor access to this portion of the park into the future.

Selected Action

Alternative B, Reconstruction of Bridge, 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) improve the bridge to meet the current bridge design standards, 2) increase the vehicular load capacity for the bridge, 3) improve safety of the bridge and adjacent parking and pullout areas, 4) maintain visitor access on this section of the Grand Loop Road into the future, and 5) preserve the historic integrity of the Grand Loop Road and the visual historic integrity of the Isa Lake Bridge.

Under Alternative B, the new bridge will be constructed in the same location as the existing bridge, and the existing bridge will be disposed of off-site. The reconstructed bridge will consist of in–kind log and wood replacement of the existing wood bridge members for a large part, and substitute suitable alternative materials for the substructure and non-visible portions of the bridge, as provided in the stipulations in Yellowstone's Road Improvement Programmatic Agreement with the Wyoming State Historic Preservation Officer and the Advisory Council on Historic Preservation. The Wyoming State Historic Preservation Office was consulted on the use of appropriate compatible substitute (modern) materials, where necessary for a technologically stronger bridge. The paved width of the bridge will be widened from 26 to 30 feet and the bridge would remain on the same horizontal alignment with no shift in traffic lanes.

The reconstructed bridge will be designed to retain the historic character of the existing bridge in accordance with the Secretary of Interior's Standards on Historic Preservation. The bridge will be on

the existing alignment, though due to taller girders, the bridge will be approximately 3 feet higher in grade. The approach road on each end of the bridge will be raised to meet the elevation of the new bridge. The reconstructed bridge will have two eleven-foot wide travel lanes and a four-foot wide shoulder on each side of the road. The length of the total reconstruction zone will be approximately 1,400 feet.

No additional cutting into existing slopes beyond the existing road ditch will be required, though some temporary cuts will be required in the vicinity of the west abutment for the temporary bridge. The total area of impact outside of the existing road prism, parking area, and pull outs will be approximately 0.86 acre.

The existing bridge is currently constructed with 7 bents (sections). The new bridge will be slightly longer and will be constructed with 6 bents, each approximately 30 feet in length. The speed limit within this area of the Isa Lake Bridge will be reduced to 25 mph to improve safety for the many pedestrians in this area. Reconstruction of the Isa Lake Bridge **will be funded by the Federal Lands Highway Program.**

Mitigation Measures

The following mitigation measures were developed to minimize the degree and/or severity of adverse effects and will be implemented during construction of the action alternative, as needed:

General Construction

- No rip-rap will be placed in or along Isa Lake as part of this project.
- To minimize the amount of ground disturbance, staging and stockpiling areas will be located in existing parking areas, away from visitor use areas to the extent possible. All staging and stockpiling areas will be returned to pre-construction conditions following construction.
- Construction zones will be identified and where construction occurs next to vegetated areas that may be impacted, construction limits will be 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 would be instructed to avoid conducting activities beyond the construction zone as defined by the construction zone fencing.
- 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 more than 10 minutes while not in use according to the Superintendent's Compendium, based on CFR 36 §5.13 Nuisances.
- To minimize possible petrochemical leaks from construction equipment, the contractor will regularly monitor and check construction equipment to identify and repair any leaks. Refueling and servicing equipment will occur at least 100 feet from water bodies when feasible. Spill kits will be required at the construction site at all times.
- 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 inhabiting 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.

- 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.
- To minimize the potential for impacts to park visitors, variations on construction timing may be considered. One option may include implementation of daily construction activity curfews such as not operating construction equipment on busy holiday weekends. The NPS will determine this in consultation with the WFLHD.
- Construction workers and supervisors will be informed about the special sensitivity of park's values, regulations, and appropriate housekeeping.
- According to *NPS Management Policies 2006*, the 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, hydrologic activity associated with wetlands, or hydrothermal processes. 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 National Park Service also reduces energy costs, eliminates waste, and conserves energy resources by using energy-efficient and cost-effective technology.

Soils and Geology

- If unknown conditions or problems are encountered during the placement of bridge piers for the temporary bridge or the reconstructed bridge, the YNP geologist will be notified before the drilling to allow the opportunity to observe sediment layers during the process.

Vegetation

- Revegetation and recontouring of disturbed areas will take place following construction, and will be designed to minimize the visual intrusion of the structure. Revegetation efforts will strive to reconstruct the natural spacing, abundance, and diversity of native plant species using native 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.
- Any equipment used will be cleaned using NPS protocols for reducing the spread of non-native species.
- Because disturbed soils are susceptible to erosion until revegetation takes place, standard erosion control measures such as the use of silt fences will be used to minimize any potential soil erosion.

Water Resources

- Stormwater runoff control measures, including silt capture techniques such as silt fences will be employed to improve quality of runoff and prevent degradation of the lake and wetlands. Spill kits will be available on-site at all times.
- Design and construction measures will include development of surface water control features to minimize post-construction run-off.
- Equipment will not be allowed to operate within the Lake. If any pumping of water is required, it will be discharged to an upland site.

- The removal of the existing bridge will require confinement techniques to prevent construction debris from entering Isa Lake.
- Construction vehicles could leak fluids into the lake and wetlands. To minimize this possibility, equipment will be checked frequently to identify and repair any leaks.
- Fuel and oil services for construction machinery will be provided in a designated area away from the lake and wetlands when feasible. This will include secondary containment for all fuel storage tanks and on-site availability of a spill kit.
- Sediment curtains will be used when needed, such as pulling existing piers, and in water work to contain sediment to the immediate work zone.
- Design will be completed in such a way as to leave the shoreline of the lake in its present configuration with no change to hydraulics of the lake.

Visitor Use and Experience

- Signs will be posted and press releases done to inform visitors about construction and traffic delays.
- Traffic flow will be maintained through the construction zone via a detour route over the temporary bridge. Speed limit through the construction zone will be posted at 15 mph.
- Equipment will not be allowed to idle longer than 15 minutes when not in use. All haul loads will be tarped if required and no engine brakes will be used in or near developed areas and campgrounds.
- All motor vehicles and equipment will have mufflers conforming to original manufacturer specifications that are in good working order and are in constant operation to prevent excessive or unusual noise, fumes, or smoke.

Cultural Resources

- Should construction unearth previously undiscovered cultural resources, work will be stopped in the area of any 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 and the inadvertent discovery clause in the Parks Roads Programmatic Agreement. 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 historic Isa Lake Bridge has been documented per the Historic American Engineering Recordation, per the stipulations of the park Programmatic Agreement for the road program.
- Documentation of Yellowstone's roads as a cultural landscape was completed by the NPS Washington Office in January, 2003 and submitted to the Library of Congress.
- The Ethnographic Resource Inventory of resources found within the park important to Native American people has been compiled and was consulted in the initial planning of this undertaking.
- Extensive consultation with the WYSHPO has taken place on-site of the Isa Lake Bridge and with design review of the historic character defining features to insure that the plans progressed without adverse effect to the historic bridge or road.

Alternatives Considered

Two alternatives were evaluated in the EA including the no action alternative and one action alternative. Under Alternative A, No Action, the Isa Lake Bridge will not be reconstructed. Alternative B, Reconstruction of the Bridge, is the preferred alternative, as described in the previous section.

Environmentally Preferable Alternative

According to the CEQ 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 B, *Reconstruct Bridge along Existing Alignment* is the environmentally preferred alternative for several reasons: 1) Alternative B will meet the health and safety objectives of the project, while minimizing environmental impacts to the greatest extent possible. 2) Alternative B will keep the piers close to their existing locations and will require less permanent disturbance outside the existing roadway. 3) A temporary bridge will require temporary disturbance outside the existing roadway, but will allow visitor traffic to continue through the construction zone mostly unimpeded. 4) The bridge design for Alternative B will maintain the cultural integrity of the bridge and the Grand Loop Road. For these reasons, Alternative B causes the least damage to the biological and physical environment and best protects, preserves, and enhances historical, cultural, and natural resources, thereby making it the environmentally preferable alternative.

By contrast, Alternative A, (No Action) is not the environmentally preferable alternative because, although there will be no construction or ground disturbing activities, it will not address: 1) the inherent safety concerns of the aging structure, 2) seismic concerns, fracture critical aspects, and the deteriorating bridge deck will not be addressed, 3) this alternative does not proactively allow the NPS to maintain into the future a lake crossing for park visitors along the Grand Loop Road at Craig Pass.

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 preferred (selected) alternative 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 water resources and wetlands from bridge reconstruction and construction of the temporary bridge in the project area to a moderate degree. Minor to moderate, short-and long-term adverse impacts to soils and geology will result from ground disturbance activities. Long-term beneficial impacts will result by making improvements to log curbs in the parking area and drainage inlets and culvert pipes by reducing erosion in the project area. Short-and long-term minor, adverse impacts to vegetation will result from tree removal for the temporary bridge, disturbance to the understory, and the loss of individual plants. Rare plants will not be impacted. Reconstructing the bridge will have long-term, moderate, adverse impacts (no adverse effect under Section 106) on historic structures. Wyoming State Historic Preservation Officer, Federal Highways Administration staff, and Yellowstone National Park staff are working collaboratively to avoid adverse affect to the historic bridge through design and materials selection to the extent allowed by the Secretary of the Interior's Standards to construct a bridge that retains its historic integrity.

The overall benefit of implementing the preferred (selected) alternative is that visitor use and experience will be improved to a long-term, beneficial, minor to moderate degree because reconstruction of the bridge will ensure continued access over Craig Pass, improvements will be made to the existing parking area, and safety concerns will be improved by moving the Continental Divide sign to the west and the speed limit reduced. Further, universal access will be improved with installation of a curb cut and delineated handicap parking space near the historic kiosk.

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. Reconstruction of the bridge will eliminate the several structural flaws that cause severe deflection (movement) when used by heavy vehicles or loads and Federal Highway Administration inspection report determination of the bridge in poor condition and only capable of service for another five years.

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 park lands, prime farmlands, wild and scenic rivers, or ecologically critical areas because these resources do not exist in the project area. The preferred alternative will impact wetlands and historic structures as discussed previously and later in this document.

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 reconstruct Isa Lake Bridge was not highly controversial, nor is the effects expected to generate future controversy. This conclusion is based on the low number of comments received during the public scoping period and EA review period.

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

The effects of reconstructing a bridge are straightforward and do not pose uncertainties. The environmental process has not identified any effects that may involve highly unique or unknown risks during the scoping period, analysis for the EA or during the public review of the EA.

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. The purpose of this action is to address concerns associated with the structural flaws and poor condition of the bridge.

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.

In accordance with §106 of the National Historic Preservation Act early consultation with the Wyoming State Historic Preservation Officer (WYSHPO) on the designs of the bridge's character defining features was submitted in April 2012 with concurrence in May 2012 to "no adverse effect" to Isa Lake Bridge and the Grand Loop Road Historic District at the early stage of design. In a letter dated May 2, 2013, the WYSHPO concurred with the Park's finding that YE 800, the Isa Lake Bridge is a contributing element in the National Register listed Grand Loop Road Historic district and will not be adversely affected by the undertaking as planned. Final plans will be submitted for final review of the project effect when they are completed.

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 United States Fish and Wildlife Service (USFWS) with regards to endangered or threatened species for the *Parkwide Improvement Plan* which included the Grand Loop Road where Isa Lake Bridge is located. A biological assessment was prepared by the park, and a subsequent biological opinion was signed on January 21, 2009 by USFWS. The biological assessment and biological opinion for the entire parkwide road plan allowed for a "take" of six bears in a consecutive three year period. The Isa Lake Bridge project would constitute a "may affect but not likely to adversely affect" for grizzly bears and Canada lynx. The project is not located in lynx critical habitat or in an area where lynx have been detected.

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

The EA was made available for public review and comment during a 33-day period ending April 14, 2013. To notify the public of this review period, a letter was mailed to the park's NEPA mailing list. A press release was also sent out by the parks Public Affairs Office. A total of 4 individuals submitted correspondence that included 5 comments to the park via the NPS PEPC website at http://parkplanning.nps.gov/lsa. Two comments supported the preferred alternative; two stated they would like to maintain the aesthetic character and integrity of the bridge; one comment was related to parking. No substantive comments were received.

Native American Consultation

A scoping letter describing the proposed action was mailed to 73 tribal members of Yellowstone's 26 associated tribes in July 2012, to solicit concerns and comments for the proposed project. The park did not receive any responses. The tribes consulted are found on page 41 of the EA. The same tribes were each sent a letter notifying them of the completion of the EA and asking for comments via a letter sent in April of 2013. No responses were received.

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

Approved:

for John Wessels
Regional Director, Intermountain Region, National Park Service

5/23/13
Date

Appendix – 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, 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 water resources and wetlands, geology and soils, vegetation including rare plants, and historic structures.

Fundamental resources and values for the Yellowstone are identified in the enabling legislation for the park, the draft Foundation for Planning and Management Statement, and the Long Range Interpretive Plan. Those documents state that the fundamental resources and values come from the Park's geologic wonders, the abundant and diverse wildlife, the 11,000-year-old continuum of human history, and providing for the benefit, enjoyment, education and inspiration of this and future generations. According to these documents, all of the impact topics carried forward in the EA 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 relevant NPS planning documents.

- **Water Resources and Wetlands** – Streams and lakes in the park are designated at Class 1, Outstanding Resource Waters by the State of Wyoming. According to National Wetland Inventory data 57 categories of wetlands occupying over 228,766 acres or 357 square miles (10.3 percent) occur in Yellowstone. The preferred alternative will result in moderate, local, short-term, adverse impacts to water resources and wetlands associate with reconstruction of the bridge and temporary bridge. These impacts will include: temporarily covering the one forested wetland (0.02 acre) with fill material; an increase in turbidity from installation and removal of bridge piers; a potential increase in erosion from construction of the bridge abutments, and regarding of the parking lot and road. The temporary bridge will be removed when reconstruction of the existing bridge is complete and wetland impact will be rehabilitated. Therefore, there will be no impairment to water resources and wetlands.

- **Geology and Soils** – Yellowstone National Park lies in a geologically dynamic region of the Northern Rocky Mountains. The project area is within the Wyoming portion of the Yellowstone Plateau physiographic province, a high-elevation, dynamic landscape. The preferred alternative will disrupt the soil chemical, physical, and biological processes. Impacts will be localized, short- and long-term, moderate and adverse. Total area of new soil disturbance will be approximately 0.86 acre. To lessen impacts, topsoil management guidelines will be followed; therefore there will be no impairment to geology and soil resources.

- **Vegetation including Rare Plants** – The project area is surrounded by a typical subalpine forest in Yellowstone National Park with lodgepole pine, Engelmann spruce, subalpine fir, and whitebark pine. The understory is dominated by grouse whortleberry, elk sedge, and Utah honeysuckle. Yellow pond lilies grow throughout the lake. The preferred alternative would remove 0.14 acre of vegetation, 0.02 of this amount being wetland vegetation as described above. Approximately 35 to 50 trees with a diameter breast height ranging from 3-10 inches will be removed. The dominant overstory trees species that will be removed are subalpine fir and Engelmann spruce. Relatively few (<25) whitebark pine saplings that occur in the understory will be removed. Two to five whitebark pines that are about 10 meters in height will be removed due to construction of the temporary bridge. These trees, along with the rest of

the whitebark pine in the area are not considered a food source for bears. No rare plants will be impacted. The loss of vegetation will not affect the viability of local plant populations, and with the application of mitigation measures to minimize disturbance, impacts will be local, short-and long-term, minor, and adverse. Mitigation measures will include following topsoil management guidelines; therefore ensuring there will be no impairment to vegetation including rare plants.

- **Historic Structures** – Yellowstone National Park contains many historic structures that are or eligible for the National Register of Historic Places. The preferred alternative, reconstructing the existing bridge where it currently exists, will have a local, long-term, moderate, adverse impact on historic structures. Yellowstone National Park and the Wyoming State Historic Preservation Officer have discussed the best practical solutions to be applied to the reconstruction and rehabilitation of the bridge to provide a structure that can withstand heavy vehicles or loads but retain its historic integrity; therefore, there will be no impairment to historic structures.

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.