



Finding of No Significant Impact

Bechler Administrative Area Improvement Plan Environmental Assessment

Background

In compliance with the National Environmental Policy Act (NEPA), the National Park Service (NPS) has prepared an Environmental Assessment (EA) to examine various alternatives and environmental impacts associated with proposed improvements to the Bechler Administrative Area of Yellowstone National Park (YNP).

The overall purpose of completing an environmental assessment for the Bechler Administrative Area Improvement Plan is to guide future improvements while maintaining and enhancing the historic district and National Historic Landmark areas. Those values include protecting the natural and cultural resources in the area while providing for the benefit and enjoyment of the people. The NPS believes that this plan protects those values while accomplishing the objectives set forth in this plan.

More specifically, the purpose of the proposed improvements is to optimize visitor experience and park operations by addressing day use, overnight parking, circulation, employee housing, and utilities. Long-time needs for the area include maintaining acceptable standards and levels of visitor and employee services. All actions proposed under this plan will be phased and implemented as funding becomes available.

Objectives

Improved Parking and Traffic Flow

Current parking conditions are inadequate and unorganized. Improvements will include:

- Designating areas for day use, overnight use, stock use, and employee activities.
- Developing appropriate vehicle and pedestrian circulation patterns that provide easy access to trails, historic districts, and the visitor contact station.
- Providing a more user-friendly and suitable visitor contact station. Currently, information about the area is available at the visitor contact station, and once visitors leave this area, additional information is limited. Visitor contact station improvements are needed to accommodate more visitors at a time and provide additional information after working hours.

Measures of success will include:

- Delineated parking that accommodates vehicles with or without stock trailers, overnight and day-use visitors, and employees.
- Increased separation of vehicle circulation zones from both pedestrians and long-term parking areas.

- Designated safe pedestrian walkways and crossing zones.
- Improved interpretation of the Bechler area for visitors, both inside and outside the contact station, which may include topics on history, natural resources, visitor safety and orientation to the area.
- Improved visitor experience when procuring backcountry or fishing permits, or when obtaining general information by providing a facility that will accommodate larger groups inside at one time.

Ensuring an NPS Presence

Currently, Bechler does not have adequate housing for staff. The proposed improvements include:

- Reinforcing an NPS presence at Bechler during the peak season and intermittently during the remaining parts of the year by providing several housing units that could accommodate winter operations.
- Upgrade existing housing and utilities to accommodate up to eight park employees.
- Address lack of family housing facilities through renovations to provide one family housing unit.

Measures of success will include:

- Improved employee housing conditions.
- Improved employee work environment and safety.
- Improved utilities (to include renewable energy).

Meeting Bechler Area Needs While Protecting YNP Values

As with any improvements proposed within YNP, this project:

- Must be compatible with the overall values and purposes for which Yellowstone National Park was set aside.
- Must be compatible with the natural and cultural resources associated with the diverse areas of the park—in this case, with protecting and preserving the natural and cultural resources of the Bechler Administrative Area.

Measures of success will include:

- Maintain the historic integrity of the Bechler River Soldier Station and other buildings as part of the Fort Yellowstone National Historic Landmark and Historic District designations.
- Protect native vegetation and wildlife.

Selection of the Preferred Alternative

The NPS examined three alternatives, including Alternative A (No Action), Alternative B (Multiple Housing Units and New Visitor Contact Station), and Alternative C (Single Multiplex Employee Housing Unit and Adaptive Reuse). The NPS has selected Alternative B, Multiple Housing Units and New Visitor Contact Station, as the preferred alternative (selected action) because it best meets the purpose and need for the project as well as the project objectives. The NPS has decided to remove the proposed telecommunications tower from the scope of the project at this time. When specific designs are completed and funding secured, additional compliance in accordance with the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA) will be undertaken specific to the telecommunications infrastructure. Under Alternative B the following improvements are proposed:

Parking & Circulation

- **Vehicles** will continue to enter the Bechler area using the existing spur from Cave Falls Road. Parking areas will be expanded with additional gravel, but will be further away from the historic buildings along the entrance road.
- **Visitors will no longer be permitted to drive around the small loop** past the Bechler River Soldier Station, and vehicles will not be allowed to park within the historic district. This change in traffic flow will better accommodate an increased number of day-use and overnight visitors, as well as vehicles pulling stock trailers, while providing designated areas for each.
- **The discontinuation of visitor vehicle traffic around the loop** will allow for a safer visitor walking experience to the main trailhead, the visitor contact station, and within the landmark and historic districts. In addition, the visual and historic qualities of the historic district will be enhanced by moving vehicle parking and circulation away from the historic district. Hitching rails and posts will be installed adjacent to the parking area to allow for safe holding of stock and easy access to trails in the area. Individual parking spaces will be delineated with wood or other natural materials.
- **Employee parking spaces** will be constructed and serve approximately eight vehicles near the housing units. To construct these parking spaces an access road will be constructed. Log curbing and/or sit rails or bollards will be added where necessary to deter visitors from parking outside the established parking limits.

Employee Housing

- **New housing** will be designed and constructed sensitively to be the same or smaller in scale and size to the site's existing historic buildings (Bechler River Soldier Station and the Bechler Barn), and compatible in design with the historic character of the area. Any alterations to the existing historic structures will adhere to the Secretary of Interior's Standards for the Treatment of Historic Structures. There will be from one to six buildings accommodating single or multiple units. One-and-a-half story units will be permissible where roof space permits, as long as roof pitch and height maintains compatibility with historic buildings. The new housing units will be no more than 600 square feet each, with a building footprint not to exceed 1,500 square feet (including porches). The units will be self-contained and each will include a small efficiency kitchen, living room/dining room area, bedroom and full bathroom; or studio style, with one room serving as kitchen, living, dining and bedroom with a separate bathroom. Sustainable designs and renewable energy systems will be implemented in order to meet High Performance and Sustainable Buildings Guidance.
- **Laundry** will be located in one space shared by all the units, which will be designed and positioned on the site to make the best use of passive heating and cooling, avoiding the need for air conditioning. **Heating systems** will be installed in the units to provide heat as needed in the early and late parts of the season. A **fire protection system** consisting of a smoke and heat detection alarm and sprinklers will also be installed. Two units will be constructed to enable **winter-season use** with the building envelope and utilities appropriately designed and constructed to handle long periods of sub-zero temperatures. At least one unit will be designed to meet current accessibility standards.
- **The Bechler River Soldier Station will be rehabilitated** according to the Secretary of Interior's Standards to serve as housing to accommodate two employees or one family. Although in recent years the south-side residence has functioned as a common space for staff living in the existing ATCO (brand) trailer, small updates will support its intended use as a self-contained housing unit. Improvements will include: interior painting, floor refinishing, insulation upgrades, installation of an access door allowing the use of both sides for a family, and the installation of high efficiency Energy Star appliances. **Temporary housing units (PortaDorms) may be utilized** until funds can be obtained for the permanent housing construction. The ATCO trailer and associated utility connections will be removed followed by rehabilitation of the area. PortaDorms are typically two bedroom units and can be prefabricated or built on-site. These temporary units will be moved to

nearby locations where they will not impede the construction of the permanent units. The temporary units will be connected to existing utilities, including water, sewer, electric, and propane, which will entail excavation and placement of additional underground piping/wiring. The size of the units will be between 500 and 1000 square feet. Additionally, temporary contractor housing may be sited in the area during construction periods due to the remote nature of the location. Housing for additional staff will include two trailer sites with hook-ups and will be located in the administrative/support services area, an area that will not adversely impact the landmark and historic districts.

Visitor Contact Station

- **The new visitor contact station will not exceed 1,000 square feet** and will be sustainably designed and constructed to accommodate larger groups of visitors at a time, while providing additional space inside the station for staff. The new station will be equipped with a fire protection system consisting of smoke and heat detection alarms, along with sprinklers, and will be designed to current accessibility standards. The new visitor center will be constructed according to the Secretary of the Interiors Standards and will be compatible with the landmark and historic district.
- **The current visitor contact station interior will be rehabilitated** to allow future use as a storage shed or as an employee fitness center, since the current location of the fitness center (in the Bechler River Soldier Station) will no longer be available due to the rehabilitation of the two housing units. The current visitor contact station will also receive upgrades to improve structural stabilization, helping decrease movement of the walls due to heavy snow loads.

Mitigation Measures

General Construction

- To minimize the amount of ground disturbance, staging and stockpiling areas will be in previously disturbed sites, away from visitor use areas to the greatest extent possible. All staging and stockpiling areas will be returned to pre-construction conditions following construction.
- Construction zones will be identified and fenced with construction tape, snow fencing, or similar material prior to any construction activity. The fencing will define the construction zone and activity will be confined to the minimum area required for construction. All protection measures will be clearly stated in the construction specifications and workers will be instructed to avoid conducting activities beyond the construction zone as defined by the construction-zone fencing. Existing vegetation that is intended to be preserved will be identified and protected with construction fencing (see item 2 in Vegetation and Rare Plants, below).
- Fugitive dust generated by construction will be controlled by spraying water on the construction site and park-managed roads as necessary. Prior approval will be received before road watering is initiated on sections of road maintained by the Forest Service. Any water used for dust control will be taken from fire hydrants in the administrative area, or from a local source approved by the park.
- To minimize possible petrochemical leaks from construction equipment, the contractor will regularly monitor and check construction equipment to identify and repair any leaks.
- Construction workers and supervisors will be informed about the special sensitivity of the park's values, regulations, and appropriate housekeeping policies.
- According to *NPS Management Policies 2006*, the NPS will strive to construct facilities with sustainable designs and systems, to minimize potential environmental impacts (NPS 2006). Development will not compete with or dominate the park's features, or interfere with natural processes, such as the seasonal migration of wildlife, or hydrologic activity associated with wetlands or hydrothermal processes. To the greatest extent possible, the design and management

of facilities will emphasize environmental sensitivity in construction, use of nontoxic materials, resource conservation, recycling, and integration of visitors with natural and cultural settings. The NPS also reduces energy costs, eliminates waste, and conserves energy resources by using energy-efficient and cost-effective technology.

- Should unidentified cultural resources be encountered, the park Section 106 coordinator will be contacted immediately and work in the immediate area of the discovery will halt.

Soils and Geology

- Topsoil conservation measures will be employed prior to construction to enhance revegetation efforts following the construction phase.
- Disturbed soils are most susceptible to erosion and until revegetation takes place. For that reason, standard erosion control measures, such as silt fences and/or sand bags, will be used to minimize potential soil erosion.

Vegetation and Rare Plants

- Revegetation and recontouring of disturbed areas will take place following construction and will be designed to minimize the visual intrusion of the structure and landscape. Revegetation efforts will strive to reconstruct the natural spacing, abundance, and diversity of native plant species. All disturbed areas will be restored as nearly as possible to pre-construction conditions shortly after construction activities are completed.
- Nonnative species control methods will be implemented to minimize the introduction of noxious weeds and the construction site will be monitored and species treated after the work is complete. This project will follow Topsoil Retention/Vegetation Guidelines developed for previous projects within the park. Some trees may be removed, but other existing vegetation at the site will not be disturbed to the greatest extent possible. Existing vegetation that is intended to be preserved will be identified and protected with construction fencing (see item 2 in general construction, above).
- Any equipment used will be cleaned using NPS protocols for reducing the spread of any nonnative plant species prior to entering the park.
- Construction workers and supervisors will be informed about special status plant species, such as *Juncus vaseyi*, a species found close to Wyoming Creek. Contract provisions will require the cessation of construction activities if a species were discovered in the project area. Should this occur, park staff will re-evaluate the situation and implement appropriate contract modifications and protection protocols as required to protect the discovery.

Wildlife

- All contractors and employees will be required to adhere to the guidelines and procedures pursuant to Yellowstone National Park's Bear Management Program including proper food storage and safety measures.
- Any trash receptacles in the administrative area will be of a design considered "bear proof." All outdoor food storage will adhere to park policies already in place to ensure no unattended food sources are available to wildlife.
- All tree removal activities will occur outside of the migratory bird nesting season (May 15–August 1).
- For interior or exterior renovation to structures where bats are present, or suspected to be present during part of the year, the project lead will coordinate with park wildlife biologists at time of design.

Soundscapes and Air Quality

- To reduce noise and emissions, construction equipment will not be permitted to idle for more than 10 minutes while not in use according to the Superintendent's Compendium, based on 33 CFR 36 § - 5.13 Nuisances.

Cultural Resources

- Designs for new buildings within close visual proximity of the landmark and historic districts will be well executed and sensitive to the cultural and natural environment. The NPS will identify the district's character defining features in its design planning process, and use a project-specific design recognizing the unique visual and cultural features that qualified the district for listing in the National Register of Historic Places. New construction and alterations to historic buildings, site, and setting will be consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties and will be contingent upon completion of Section 106 responsibilities including consultation with the State Historic Preservation Officer (SHPO).
- Should construction unearth previously undiscovered cultural resources, work will be stopped in the area of the discovery and the park will consult with SHPO and the Advisory Council Officer and the Advisory Council on Historic Preservation, as necessary, according to §36 CFR 800.13, Post Review Discoveries. In the unlikely event that human remains are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act (1990) and NPS Director's Order 28 will be followed.
- The NPS 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 procedures to follow in case previously unknown archeological resources are uncovered during construction.

Visual Quality

The final site selection for the housing, solar arrays, and RV sites will be sensitively sited outside the landmark and historic districts. Location and use of vegetation and non-historic elements of the developed area will be used to avoid adverse effect under § 106 of the National Historic Preservation Act.

Alternatives Considered

Three alternatives were evaluated in the EA, including the no-action alternative and two action alternatives.

- **Alternative A (No Action):** under this alternative, no improvements, as proposed, would occur. The existing visitor contact station would continue to serve as an employee office space, a telecommunications center, a visitor contact station and would provide space for other administrative functions. Seasonal and permanent housing would continue to operate out of the Bechler River Soldier Station and the ATCO trailer. Traffic circulation and parking would remain the same. There would be no improvements made to orientation, way-finding, or interpretation for visitors. Utilities and telecommunications would not be upgraded. However, routine maintenance activities would continue to maintain the existing structures and historic assets.
- **Alternative B, Multiple Housing Units and New Visitor Contact Station:** as the preferred alternative and selected action, this option is described in full in the previous section.
- **Alternative C, Single Multiplex Employee Housing Unit and Adaptive Reuse of the Existing Visitor Contact Station,** would include the construction of a single building with up to six units that would be larger in scale and size than the historic buildings. This alternative would also include the

use of the Bechler River Soldier Station for two housing units, or a single family unit. The visitor contact station would remain in the same building. However, it would be enhanced with a simple awning allowing visitors to stand outside while sheltered from the weather, lessening congestion and increasing the ability to contact more visitors at one time while providing visitors some shelter from inclement weather during non-operating hours.

Environmentally Preferable Alternative

According to the DOI 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 (Multiple Housing Units and New Visitor Contact Station)

This alternative is the environmentally preferable alternative for several reasons:

- **The design of the new buildings and the surrounding landscaping** will better blend into the surrounding environment and will be more compatible with the landmark and historic districts.
- **This option maintains and preserves** the Bechler River Soldier Station as two employee residences or one family unit.
- **The housing will be more energy-efficient (sustainable) in the long term.** Energy saving materials used in the design of the new buildings will be more sustainable in terms of electric, propane and water consumption. Renewable energy sources will be investigated and installed as able to further reduce the consumption of electricity for the units.
- **The design of new buildings, roads and parking** offers the least-invasive option, having been kept within the footprint of previous disturbance caused by wildland urban interface tree thinning operations. While there would be some new ground disturbance to the previously undisturbed elements of the biological and physical environment, impacts to previously disturbed areas will be minimized as far as possible.
- **Alternative B would ensure** safe, healthful, productive, and esthetically and culturally pleasing surroundings for all generations.

For these reasons, Alternative B is the environmentally preferred alternative because it causes the least damage to the biological and physical environment. It best protects, preserves, and enhances historical, cultural, and natural resources, thereby making it the environmentally preferable alternative to the other two alternatives and for the reasons further summarized in the following paragraphs.

Alternative A (No Action)

Although there would be no construction or ground disturbing activities that would damage previously undisturbed elements under Alternative A of the biological and physical environment, it does not achieve a balance between park resources and the health and safety of park staff. Originally intended for use as an interim housing facility, the ATCO trailer has exceeded its usable lifespan.

Alternative C

This option has a smaller disturbance footprint related to the construction of a single building as compared to Alternative B. However, the proposed single building would not be compatible with the rustic style and size of the existing structures within the historic district. Therefore, it does not enhance the historic resources of the Bechler area and is not the environmentally preferred alternative.

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 experience and park operations, outweighs these negative effects. The adverse effects are summarized as follows.

- Ground disturbance activities associated with construction of new employee housing, new visitor contact station, parking lot expansion, and utility lines will disturb soil in the project area to a minor to moderate degree.
- Minor impacts to vegetation will occur due to removal of ground cover from construction operations and an increase in suitable stratum for establishment of invasive plants.
- Continued human presence and the construction of new employee housing and parking lot expansion will have minor impacts on wildlife and special status wildlife species and Yellowstone species of management concern.
- During construction, minor impacts to the soundscape will occur due to the use of heavy machinery and construction equipment.
- Historic structures will be moderately impacted due to rehabilitation of the Bechler River Soldier Station if done within the Secretary of the Interior's Standards for Treatment of Historic Structures.
- Removal of the ATCO trailer will provide moderate long-term beneficial impacts to the landmark and historic districts.
- Construction related noise, presence of machinery and trucks, road delays from moving equipment, and views of construction will have moderate impacts to visitor experience.
- Moderate impacts will occur to park operations during construction from noise and dust.

The overall benefit of implementing the preferred (selected) alternative is that visitor use experience and park operations will be improved to a moderate degree by providing the following:

- delineated parking to accommodate overnight and day use visitors with vehicles and horse trailers,
- separation of pedestrians and parked vehicles from moving traffic,
- designation of safe walkways and crossings,
- improved interpretation of the Bechler area,
- construction of a more suitable visitor contact station,
- improved employee housing,
- and improved and enhanced setting and location for the national landmark and historic districts by removing the ATCO trailer.

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 the Bechler area employees that will utilize the new larger visitor contact station and employee housing. The new visitor contact station will provide improved work areas for employees, including handicap accessible office space, family-friendly accommodation options, general work areas, a break room, and storage spaces. Light, ventilation, and heating will also be improved in the new building.

New employee housing will eliminate many of the poor conditions associated with the existing housing, including no plumbing in the sleeping quarters, a separated living/sleeping arrangement, poor lighting, storage, and rodent infestations, and will thus provide a safer, cleaner living environment for park staff.

Under the preferred alternative, both employee and visitor health and safety will be improved by the delineation of parking spaces and traffic circulation that will separate pedestrians and parked vehicles from traffic. Visitor health and safety will also be enhanced due to designated safe walkways and crossings.

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, wetlands, wild and scenic rivers, or ecologically critical areas because these resources do not exist in the project area. The final site selection for the housing, solar arrays, and RV sites, will be sensitively sited outside the landmark and historic districts. Location and use of vegetation and non-historic elements of the developed area will be used to avoid adverse effect under § 106 of the National Historic Preservation Act.

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

The environmental assessment analysis revealed no effects on the quality of the human environment, and therefore the effects are not likely to be highly controversial.

Throughout the environmental analysis process, the proposal to make improvements to the Bechler Administrative Area was not highly controversial. During public scoping, many comments focused on keeping the remote and rustic setting of the area intact. Five comments were not in support of any improvements. Other comments included the use of sustainable materials and energy system design, keeping the road to Bechler unpaved but maintained, and support for additional way-finding and interpretive materials of the area. These comments have been addressed in the attached errata sheets.

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

The proposal involves improving conditions in a way that enhances visitor experience while providing a safe, healthy and functional working environment for park staff. 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 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 will not predetermine or establish a precedent for future action with significant effects at the project area or within the Bechler area and does not represent a decision in principle about a future consideration. Future actions, such as additional improvements within the Bechler area will proceed independently of this project and will receive a separate environmental analysis.

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.

According to NEPA, the renovation of the visitor contact station will have moderate adverse impacts* on the structure, but with collaborative design consultation with the Wyoming State Historic Preservation Office, it will not adversely affect its status as a contributing structure to the landmark and historic districts. Construction of the employee housing, expansion of the parking area, the new visitor contact station, and the siting of the solar array will be outside the landmark and historic districts. Location and use of vegetation and non-historic elements of the developed area will be used to avoid adverse visual effects under Section 106 of the National Historic Preservation Act. The area for the new housing and visitor contact station is visually separated from the two districts so the new construction will have minimal visual impact on historic structures. The removal of the ATCO trailer will have moderate beneficial long-term impacts to the landmark and historic districts.

A letter dated May 14, 2013 from the Wyoming SHPO requires the park to conduct further consultation in accordance with §106 of the NHPA as undertakings from this plan are implemented.

**Note that NEPA's definition of "adverse impact" does not necessarily correlate to adverse effect per the National Historic Preservation Act. Adverse impacts can exist per NEPA without rising to the level of adverse effect per NHPA.*

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.

The US Fish and Wildlife Service on May 10, 2013 concurred with the NPS determination for federally listed threatened and endangered species. The preferred alternative "may affect, but [is] not likely to adversely affect" grizzly bears, and will have "no effect" on Canada lynx and designated critical habitat for lynx. Park resource specialists have the information to assess the impacts to state listed species and state agencies have not been consulted on projects in the past.

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 30-day period ending May 5, 2013. To notify the public of this review period, a postcard was mailed to stakeholders, interested parties, and a press release was posted on the park's website. Copies of the document were sent to certain agencies, and to five interested parties who requested a copy during the scoping period; and posted on the NPS PEPC website at <http://parkplanning.nps.gov/BechlerEA>. A total of nineteen individuals submitted correspondence that included 45 comments. Nine comments supported the preferred alternative; two were opposed to the preferred alternative. Fifteen substantive comments were received and included topics on parking, telecommunications, visitor information and interpretation, and employee housing and existing structures. These comments are addressed in the "Response to Comments" attached to this FONSI.

"Response to Comments" attached to this FONSI. The FONSI and Errata Sheets will be sent to all commenters.

Native American & NHPA §106 Consultation

A scoping letter was mailed to 73 tribal members of Yellowstone's 26 associated tribes in February 2011, to solicit concerns and comments for the proposed project. A list of all tribes included in this mailing can be found on page 63 of the EA. The same tribal members were sent another letter in April 2013 notifying them of the release of the EA for public review and soliciting comments on the project. The park did not receive any comments from Native American tribes.

In accordance with §106 of the National Historic Preservation Act, the NPS provided a scoping letter to the Wyoming State Historic Preservation Office (WY SHPO) in February 2011 to provide an opportunity to comment on the initial impacts of the project. In April 2013, the NPS provided the WY SHPO with a copy of the EA and sought a "no adverse effect" determination on the landmark and historic districts for the actions proposed under the preferred alternative. A letter dated May 14, 2013 from the WY SHPO requires the park to conduct further consultation as undertakings from this plan are implemented. Collaborative consultation design with the WY SHPO will be on-going and completed as funding and design becomes available.

Conclusion

As described, the preferred alternative (selected action) does not constitute an action meeting the criteria that normally requires 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 negligible to moderate adverse impacts that range from localized to widespread and short- to long-term. There are no unmitigated adverse effects on public health, public safety, threatened or endangered species, archeological sites or historic 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 NPS has determined that an EIS is not required for this project and thus will not be prepared.

Approved:


Sue E. Masica
Regional Director, Intermountain Region, National Park Service

7/1/14
Date

Errata Sheets

Bechler Administrative Area Improvement Plan

Yellowstone National Park

According to NPS policy, substantive comments are those that 1) question the accuracy of the information in the EA, 2) question the adequacy of the environmental analysis, 3) present reasonable alternatives that were not presented in the EA, or 4) cause changes or revisions in the proposal.

Some substantive comments may result in changes to the text of the EA, in which case, they are addressed in the *Text Changes* section of the Errata Sheets. Other substantive comments may require a more thorough explanatory response and are addressed in the *Response to Comments* section. NPS responds to all substantive comments in either or both of these sections.

Of the nineteen pieces of correspondence that were received during public review of the EA, fifteen were considered substantive. Substantive comments for this EA centered on parking, telecommunications, visitor information and interpretation, and employee housing and existing structures. These concerns resulted in minor changes to the text of the EA and are also explained more thoroughly in the *Response to Comments* section.

Text Changes

Page ii, Summary– Change Statement: The words “and telecommunication functions” will be removed and the sentence will read “**Actions proposed in this environmental assessment (EA) would improve visitor experience and park operations by addressing day use and overnight parking, traffic circulation, employee housing, and utility upgrades.**” **Page ii, Summary**– Change Statement: The words “and telecommunication” will be removed and the sentence will read “**Those actions common to Alternatives B and C would include improvements to the following: traffic circulation and parking; stormwater management; orientation, way-finding and interpretation; accessibility; sustainable design; and utilities (including the use of renewable energy); and vegetation management.**”

Page iii, Summary– Change Statement: The words “and telecommunication” will be removed from the Table of Contents and the sentence will read “**Utilities.**”

Page 1, Purpose and Need– Change Statement: The words “and telecommunication functions” will be removed and the sentence will read “**Actions proposed in this environmental assessment (EA) would improve visitor experience and park operations by addressing day use and overnight parking, traffic circulation, employee housing, and utility upgrades.**”

Page 6, Purpose and Need– Change Statement: The words “and telecommunications” will be removed and the line will read “**Improved utilities (to include renewable energy).**”

Page 14, Alternative A – No Action– Change Statement: The words “and telecommunications” will be removed and the sentence will read “**Utilities would not be upgraded.**”

Page 14, Site Design– Change Statement: The words “and telecommunications tower” will be removed and the sentence will read “**Exact locations have not been determined, however, the temporary and permanent housing, two RV sites, solar array, new visitor contact station (Alternative B Only) would all be within the defined zones proposed.**”

Page 18, *Utilities and Telecommunications*– Change Statement: The words “and Telecommunications” will be removed and the line will read “**Utilities.**”

Page 18, *Utilities and Telecommunications*– Change Statement: The words “(for internal networking purposes)” will be added and the line will read “**Electric, water, propane, septic, fiber and copper telecommunications (for internal networking purposes) would be upgraded and connected to the new housing structures.**”

Page 19, *Utilities and Telecommunications*– Remove Statement: The words “A new less visually obtrusive telecommunications mounting structure would be erected to consolidate all existing telecommunication structures currently in the area. The mounting structure would be designed according to criteria established in the Yellowstone National Park Wireless Communication Services Plan Environmental Assessment of 2009 and would be sited to blend with the existing vegetation. The weather station would be moved from its current location just outside the horse corral to the same area to consolidate structures” will be removed.

Page 25, *Utilities and Telecommunications*– Change Statement: The words “and the new appropriately sized telecommunications structure” will be removed and the sentence will read “The final site selection for the housing, solar arrays, and RV sites would be oriented in such a way as to not cause adverse impacts to the landmark and historic districts, and not be visually obtrusive to the rustic nature of this area.”

Page 27, *Alternative Summaries*– Change Statement: The words “and Telecommunications” will be deleted and the words “(for internal networking purposes)” will be added and the table will read “**Utilities**” and “**Electric, water, propane, septic, fiber and copper telecommunication (for internal networking purposes) would be upgraded and connected to the temporary, permanent housing as well as the volunteer trailer sites.**”

Page 13, *Wilderness* – Change Statement: “The project area has not been recommended for wilderness designation,” to “**The project area is not located within YNP’s recommended wilderness.**” Delete “however it is managed by the NPS as wilderness.”

Page 24, *Cultural & Paleontological Resources* – Add: “**Archeology staff will monitor ground disturbing activities if that ground disturbance is taking place in proximity to the non-eligible archeology site.**”

Page 24, *Soundscapes and Air Quality* – Add: “**All equipment used during construction will be equipped with mufflers or equivalent noise-reducing equipment that equals or exceeds original equipment at the time of manufacture. The broadcast of amplified music or radio is prohibited. The selection of equipment will include attention to quiet technology with preference given to less noisy equipment when feasible. Non-motorized tools will be used when feasible (ex. broom or rake).**”

Page 24, *Wildlife* – Add: “**For interior or exterior renovation to structures where bats are present, or suspected to be present during part of the year, the project lead will coordinate with park wildlife biologists at time of design.**”

Page 29, *Table 2- Environmental Impact Summary by Alternative, Wildlife-Alternative B-Minimum*. Change Statement: “Direct and indirect, local, short-term, minor adverse impacts upon wildlife will result due to continued human presence and the construction of new employee housing, “**a new visitor contact station and parking lot expansion.**”

Page 29, *Table 2- Environmental Impact Summary by Alternative – Wildlife-Alternative C-Maximum*. Change Statement: “Direct and indirect, local, short-term, minor adverse impacts upon wildlife will result due to continued human presence and the construction of new employee housing, **reuse of the existing visitor contact station, and parking lot expansion.**”

Page 51, *Impacts of Alternative B (Preferred)* – Add: Before the last sentence of the paragraph. “**Construction activities of heavy equipment and building structures may create short-term noise**

that can be heard within the surrounding backcountry, with the exception of locations near rushing rivers or waterfalls, and during periods of high winds."

Page 51 and 52, *Cumulative Effects* – Add: After second sentence. "Aircraft overflights (high jets, propeller planes, and helicopters) which are audible in most of YNP 5-10 percent of the day will continue (Burson 2013)."

Page 55, *Impacts of Alternative B (Preferred)* – Delete: Fifth sentence (added twice). "The area proposed for the new housing and the visitor contact station is visually separated from the two districts so the construction of new housing in this area will have no impact on historic structures."

Page 55, Edit: *Impact of Alternative C* to **Impacts of Alternative C.**

Page 57, *Impacts of Alternative B (Preferred)* – Change Statement: Paragraph 2, sentence 3. "The addition of interpretive signs enhancing the history of the Bechler area would result in a moderate, beneficial impact for visitor use and experience."

Page 62, *External Scoping* – Add: Last sentence, first paragraph. "Park County Historic Preservation Commission will be invited to consult for purposes of Section 106 consultation."

Page 65, *References* – Add: After Burson, Shan. 2009. "Burson, Shan. 2013. Information Received during Public Comment. April 6, 2013."

Appendix A:

Response to Comments

Bechler Administrative Area Improvement Plan Yellowstone National Park

Roads, Trails & Parking

Comment 1 – The parking lot looks too big. Why not a smaller area where people have to park their stock trailers separately from their vehicles. It is easier if you don't have to unhook your trailer. But the cost is more space taken up by a parking lot which will invite more use.

Response 1 – Inadequate and unorganized parking was identified in the purpose and need of this plan. With the implementation of this plan, a better designed parking area will take into account the need for different uses and vehicle sizes and spaces will be sized appropriately to reflect that need. The proposed parking area presented in the plan was designed to accommodate use at current peak season levels.

Comment 2 – Recommend that NPS plan on overflow parking for visitors and extra horse trailer parking. August and September weekends will fill the parking currently planned.

Response 2 – The preferred alternative in the environmental assessment proposes to change the traffic flow to better accommodate increased numbers of day use and overnight visitors, based on current peak use, and provide delineated parking spaces.

Comment 3 – Do not want a paved four lane highway to Bechler.

Response 3 – Vehicles will continue to enter the Bechler area using the existing spur from Cave Falls Road. Improvements to this road are outside the scope of this project.

Visitor Information, Wayfinding & Interpretation

Comment 5 – Please do not construct a visitor center there. A small historical interpretive display may be in order but that must be carefully planned.

Response 5 – The need for a more suitable visitor contact station was identified in the purpose and need of the project. The new visitor contact station will not exceed 1,000 square feet. In addition, it will accommodate more visitors at one time and enable visitors to obtain necessary permits and information. The proposed visitor contact station will provide additional space for staff and be designed for handicap access.

Comment 6 – Would like to see a couple of rangers stationed there, but with monetary cutbacks that might just be a dream.

Response 6 – The Bechler visitor contact station is open, June 1 to November 1. Currently, conditions allow for up to seven employees to live and work within the Bechler Administrative Area but do not allow for use in the winter months. The preferred alternative will construct housing for up to eight employees, with one unit that could be used for a family and two units constructed to enable winter-season use.

Employee Housing & Existing Structures

Comment 7 – I would like to see any changes in the Bechler area minimized so that it may continue to be a "wild" portion of the park that we can enjoy without seeing any signs of development as has happened in other parts of the park. Changes should be made to improve conditions for staff and not visitors.

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Appendix A: Response to Comments (page 2 of 4)

Response 7 – *The remote rustic feel of Bechler was a consideration throughout the planning process. The site design was based on the need to be sensitive to the landmark and historic districts. Alternative B was selected both for its sensitivity to the districts as well as to provide smaller structures more in keeping with the current rustic nature of the Bechler area. The preferred alternative addresses the need for improved conditions for staff by constructing new staff housing while renovating current housing, and will improve the staff work environment through the construction of a new visitor contact station. Staff will also benefit from improvements specific to visitors such as improved circulation and parking, as they will no longer have to assist with directing visitor parking.*

Comment 8 – The only reason for adopting Alternative B seems to be that the size of a single residential building would be out of character with the scale of the historic district buildings.

Response 8 – *The preferred alternative was selected because the buildings' size and scale will be more compatible with the landmark and historic districts, and will blend better with the surrounding natural environment, keeping the appearance and impression of a small remote outpost.*

New Ideas

Comment 9 – Developing a new Alternative D that remains inside the existing footprint will be possible. It might sacrifice some of the historic or cultural values here by increasing the density of use in the existing footprint- but it is better to sacrifice these human-associated values in a wilderness-threshold area than to sacrifice the natural and wilderness values.

Response 9 – *Alternatives B & C both remain within the existing footprint. The NPS intention to preserve both the natural and cultural resources has been considered in the planning of the project and all proposed actions are within the existing footprint of the previous disturbance caused by wildland urban interface tree-thinning operations. The preferred alternative was also selected as the environmentally preferable alternative in the environmental assessment because it limits construction to the current developed area. According to the Council of Environmental Quality (CEQ) regulations implementing NEPA (43 CFR 46.30), an environmentally preferable alternative is one that causes the least damage to the biological and physical environment and best protects, preserves, and enhances historical, cultural, and natural resources.*

General Comments

Comment 10 – It is not sufficient to state (p.14) that “exact locations have not been determined” for the projects proposed under Alternatives B and C. How can the public analyze the visual and other impacts of such “improvements” if we do not know where anything will be located?

Response 10 – *While exact locations have not been determined, actions proposed in Alternatives B and C are based on site design concepts (Figure 8, pg. 15) that identify three use-area zones: administrative/support services; historic setting; and visitor services. These zones have been evaluated in greater detail in Alternative B (Figure 13, pg. 21) and Alternative C (Figure 14, pg. 22) and the impacts were determined based on these conceptual renderings. If changes during final site design are inconsistent with the intent and anticipated impacts disclosed in this EA, then additional compliance will be completed as appropriate.*

Comment 11 – NPS states (pg. 53) that it “will make every feasible effort to ensure new construction will not adversely affect the landmark and historic districts.” This is meaningless assurance with lots of wiggle room. What does “every feasible effort” mean?

Response 11 – NPS states (pg. 53) in the environmental assessment that new construction will be consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties and continual consultation with the Wyoming State Historic Preservation Officer will occur as the design evolves toward the production of construction documents. Location and use of vegetation and non-historic elements of the developed area will be used to avoid adverse effect under § 106 of the National Historic Preservation Act. Should further consultation with WYSHPO result in an adverse affect determination, the park will re-evaluate the FONSI.

Comment 12 – Page 13 of the EA makes this startling assertion: "The project area is managed by the NPS as wilderness." The Wilderness Act of 1964 flatly prohibits any "structure of installation: within a wilderness area." Does NPS maintain that a new, large industrial monopole well above nearby treetops will be consistent with the Wilderness Act?

Response 12 – The Bechler administrative area, including the proposed action area, is not within the recommended wilderness of YNP. The wilderness boundary is approximately 340 feet away from the ATCO trailer. Although the improvements are proposed in an area not designated, the improvements support protecting the area through increased patrols and better administration of the area as wilderness. Text changes are reflected in the Errata Sheets above.

Telecommunication Concerns

Comment 13 – NPS has failed to provide critical details about the existing and proposed towers (height; location; structure; antenna size and configuration; etc.). How can the public submit thoughtful comments without this information? NPS needs to provide this information and then re-open the comment period for another 30 days.

Response 13 – The NPS has decided to remove the proposed telecommunications tower from the scope of the project at this time. When specific designs are completed and funding secured, additional compliance in accordance with the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA) will be undertaken specific to the telecommunications infrastructure.

Comment 14 – It appears that you have not considered NPS Management Policy 8.6.4.3 (Telecommunications Sites), which states: "New traditional towers (i.e., monopole or lattice) should be approved only after all other options have been explored." The "rendering" on page 18 looks like a traditional monopole to me. If NPS has explored "all other options," the findings haven't been disclosed here.

Response 14 – See Response 13.

Comment 15 – How did a cell phone booster come to be placed at Bechler. The EA notes on pg. 5 that the "generator building house a very low power cell phone booster that services the Bechler Administrative Area." When was this booster installed at Bechler? If it was installed after 2008, park officials have chosen to ignore key language in Yellowstone's Wireless Plan FONSI, pg. 21 stating: "The preferred alternative only allows cell coverage in the primary developments of the park? Cell phone coverage would not be promoted or available along park roads outside developed areas, or promoted or available in any of the backcountry." With its booster, NPS is purposely augmenting signals coming from outside the park to expand the availability of cellular

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communications in a remote area of the park. How is that not “promoting” the use of cell phones in the backcountry?

Response 15 – *In the early 1990s, the NPS added a cellular telephone antenna to the existing radio tower and placed a cellular “bag” phone in the ranger station. The closest land-line telephone service is 9 miles away from the station. The cell phone signal booster was installed prior to the completion of the Wireless Communications Services Plan/EA in order to continue to provide the ranger staff with telephone service to conduct government business. The cell booster provides limited telephone service for NPS operations within and immediately surrounding the visitor contact station and is not intended to provide cellular service for the public or in the backcountry. Due to the remoteness of the area, visitor and employee safety are a concern. Having reliable cell coverage is imperative to providing safe operations in this area.*

Comment 16 - On page 19, the EA states: “A new less visually obtrusive telecommunications mounting structure would be erected to consolidate all existing telecommunication structures currently in the area.” How can anyone judge whether a new tower will be “less visually obtrusive” without seeing a picture and knowing the specifications of the existing tower?

Response 16 – See Response 13.

Comment 17 – The EA (pg. 23) assures the public that the “new appropriately sized telecommunications structure: would be orientated so as to not cause adverse impacts, but one need only look at the “renderings” (pg.18) to be frightened by what the NPS considers an “appropriately sized” telecommunications tower.

Response 17 – See Response 13.

Comment 18 – *It appears that at least one of the antennas on the current tower is a large circular microwave antenna (pg.3). How will that look high on the proposed new monopole? For some reason, the rendering on pg. 18 does not show a microwave antenna on the tower.*

Response 18 – *The microwave antenna mentioned is a satellite dish that provides NPS access to the Department of the Interior (DOI) secure local area network (LAN). There are no benefits to or plans to mount the DOI LAN satellite dish on any tower in the Bechler area in the future therefore it will remain where it is currently located.*

Comment 19 – *The tower apparently will not have any impact on “Visitor Use and Experience” and “Park Operations” since there is no word written in the EA about the proposed tower under those topics. If the new tower will not change anything, then why is it needed? How long will it be before a cellular company requests placement of one of its antennas on the tower?*

Response 19 – See Response 13.

Appendix B:

Non-Impairment Finding

The 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 the 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.

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Appendix B: Non-Impairment Finding (page 2 of 3)

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 preceding topics, topics remaining to be evaluated for impairment include geology and soils, vegetation and rare plants, wildlife, special status wildlife species and Yellowstone species of management concern, soundscape management and historic structures. These topics are detailed as follows:

- **Geology and Soils** – Yellowstone National Park lies in a geologically dynamic region of the Northern Rocky Mountains. The project area consists of, and is surrounded by, a series of high volcanic plateaus made of thick magma. The preferred alternative will impact approximately 0.95 acres of soil by ground disturbance activities, the majority of which will be reclaimed, with a maximum of 0.65 acres of permanent impact for temporary and permanent housing. To minimize effects to this resource, mitigation measures will be implemented such as topsoil replacement, noxious weed treatments and native vegetation replacement. Overall, direct and indirect impacts on geology and soils will be adverse, minor to moderate, short-and long-term and localized. Given the localized nature, impacts will be short-and long-term, minor to moderate and therefore will not lead to impairment to geology and soils.
- **Vegetation and Rare Plants** – As described above, the project will permanently disturb 0.65 acres of ground, the majority of which is sparsely covered with lodgepole pine. Depending upon the sites chosen for construction, up to 0.95 acres of lodgepole pine will be selectively thinned to clear the site for construction of the new visitor contact station, temporary and permanent housing, the spur road for employee housing, and parking. To minimize effects to this resource, mitigation measures will be implemented such as following YNP's policy on revegetation management for construction replacement, washing of equipment before entering the park, noxious weed treatments to reduce impacts of disturbance and requirements to avoid rare plants. Overall, direct and indirect impacts of Alternative B on vegetation and rare plants will be adverse, short-and long-term, localized, and minor. Given that the adverse impacts are minor, there will be no impairment to vegetation and rare plants.
- **Wildlife** – Yellowstone National Park has an abundance of wildlife within its 2.2 million acres. Direct and indirect, local, short-term, minor, adverse impacts upon wildlife will result due to continued human presence and the construction of new employee housing, new visitor contact station, and parking lot expansion. Given the localized and temporary nature, impacts will not lead to impairment to wildlife.
- **Special Status Wildlife Species and Yellowstone Species of Management Concern** – Yellowstone National Park is home to the federally listed Threatened and Endangered grizzly bear, Canada lynx, and Canada lynx critical habitat. The U.S. Fish and Wildlife Service concurred with the NPS determination for listed species on May 10, 2013. The preferred alternative "may effect, but [is] not likely to adversely affect" grizzly bear, and will have "no effect" to Canada lynx and designated critical habitat for lynx. On February 4, 2013, the USFWS proposed the wolverine to be listed as threatened, moving it from candidate species category in the contiguous United States, with pending designation as threatened anticipated in late 2013. The gray wolf was removed from the federal list of endangered and threatened wildlife and from Wyoming's wolf population's status as an experimental population effective September 30, 2012. Special status wildlife species are

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Appendix B: Non-Impairment Finding (page 3 of 3)

not expected to occur within the project area due to the level of habitat disturbance and human use. Due to this lack of occurrence, constructing new employee housing, a new visitor contact station and parking lot expansion will have direct and indirect, local, minor to moderate, adverse, short-term effects on federally listed or species of management concern. With the implementation of mitigation measures listed in this EA, no impairment of special status wildlife species or Yellowstone species of management concern will occur. The Wyoming Game and Fish Department was notified of the document availability and did not comment on the project with regard to Wyoming's Species of Greatest Conservation Need.

- **Soundscape Management** – Natural sounds are intrinsic elements of the environment that are vital to the functioning of ecosystems and can be used to determine the diversity and interactions of species within communities. Overall, direct impacts of Alternative B on soundscapes will be localized, short-term and negligible for short periods when generator use will be necessary during periods of insufficient light or at night. Overall, the impacts to soundscapes will be direct, short-term, and minor. For these reasons, soundscapes will not be impaired.
- **Historic Structures** – The preferred alternative will have moderate adverse impacts* on the structures, but with collaborative design consultation with Wyoming SHPO this will not affect its standing as a contributing structure to the landmark and historic districts. The removal of the ATCO trailer will have moderate beneficial long-term impacts to the landmark and historic districts. The area proposed for the new visitor contact station and new housing is visually separated from the two districts so the new construction will have no visual impact on historic structures. Location and use of vegetation and non-historic elements of the developed area will be used to avoid adverse effect under § 106 of the National Historic Preservation Act.

Within the Fort Yellowstone Landmark Historic District and the Bechler River Soldier Station Historic District, impacts will be direct, local, long-term, and adverse due to past actions affecting the integrity of the structure interiors. Long-term beneficial impacts will result from the removal of the ATCO trailer from the historic districts. For these reasons, historic districts and contributing structures will not be impaired.

**Note that NEPA's definition of "adverse impact" does not necessarily correlate to adverse effect per the National Historic Preservation Act. Adverse impacts may exist under NEPA without rising to the level of adverse effect per NHPA.*

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 Yellowstone National Park Superintendent's professional judgment that there will be no impairment of park resources and values from implementation of the preferred alternative.