



January 23, 2018

Daniel N. Wenk, Superintendent
Yellowstone National Park
P.O. Box 168
Mammoth, Wyoming 82190-0168

RE: Phase II of Proposed Rehabilitation and Seismic Stabilization of the Mammoth Hot Springs Hotel
(SHPO File #1215BAB010)

Dear Mr. Wenk:

Thank you for consulting with the Wyoming State Historic Preservation Office (SHPO) regarding the referenced undertaking. We have reviewed the associated report and find the documentation meets the Secretary of the Interior's Standards for Archaeology and Historic Preservation (48 FR 44716-42).

We agree that the historic Mammoth Hot Springs Hotel in the Yellowstone National Park will be adversely impacted. In accordance with 36 CFR § 800.6, we recommend the YNP develop a Memorandum of Agreement (MOA), specifying the terms under which the adverse effects to the historic property(ies) will be minimized or mitigated. The agency official, SHPO and the Advisory Council (should they choose to participate) are the signatories and consulting parties to the MOA. The agency official and the SHPO, in agreement with the agency official, may choose to invite additional parties to be signatories and to concur in the MOA. Invited signatories and consulting parties may include Native American tribes that attach religious or cultural significance to the historic property and any party that assumes a responsibility under the MOA.

Please refer to SHPO project #1215BAB010 on any future correspondence regarding this undertaking. If you have any questions, please contact me at 307-777-7566.

Sincerely,

A handwritten signature in cursive script that reads 'Linda Kiisk'.

Linda Kiisk
Historic Preservation Architect
State Historic Preservation Office (SHPO)

Matthew F. Mead | Governor
Darin J. Westby, P.E. | Director
Sara Needles | Administrator



ARTS. PARKS.
HISTORY.



United States Department of the Interior



NATIONAL PARK SERVICE
YELLOWSTONE NATIONAL PARK
P.O. Box 168
Mammoth, Wyoming 82190-0168

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CERTIFIED RETURN RECEIPT

JAN 19 2018

Ms. Mary Hopkins
Wyoming State Historic Preservation Office
Barrett Building, 3rd Floor
2301 Central Avenue
Cheyenne, Wyoming 82002

Subject: Request for Concurrence on Determination of Adverse Effect on Historic Properties, for Proposed Guest Wing Rehabilitation and Seismic Stabilization of the Mammoth Hot Springs Hotel (HS-2025), Mammoth Hot Springs Historic District (48YE486), Yellowstone National Park, Wyoming (PEPC #76028).

Dear Ms. Hopkins,

This letter is an update in reference to ongoing Section 106 consultation between the Wyoming State Historic Preservation Office (WYSHPO) and Yellowstone National Park (YNP) regarding the park's proposal to implement the second phase of an interior and exterior rehabilitation to the Mammoth Hot Springs Hotel, a building that contributes to the significance of the Mammoth Hot Springs Historic District. Based on recent verbal and email consultation with your office regarding a consultation package sent to you on November 8, 2017 for this project, the park has revised its determination of effect of the project on historic properties. In accordance with Section 106 of the National Historic Preservation Act (NHPA), as amended, and implementing regulations 36 CFR §800, we request your review and concurrence on (1) our identification of historic properties in our previous November 8, 2017 consultation letter (Enclosure 1), and (2) our revised determination that this project will have an adverse effect on the Mammoth Hot Springs Hotel. Please refer to the November 8, 2017 design package for all proposed project designs and descriptions.

Previous Consultation

Yellowstone National Park submitted for WYSHPO review during Section 106 consultation on November 8, 2017, a design package for the Phase II rehabilitation of the Mammoth Hot Springs Hotel, specifically regarding the Guest Wing. During conference calls and emails between WYSHPO and the park held from November 29, 2017 to January 16, 2018, WYSHPO expressed concern over the loss of historic fabric involving the proposed in-kind replacement of 172 one-over-one, wood double-hung windows as part of the overall rehabilitation. Other project components proposed in this rehabilitation package were not raised as potential concerns. As requested by WYSHPO, the park made a good faith effort to address all questions to provide rationale for the decision-making process for alternatives considered regarding window replacement (Enclosure 2).

Revised Determination of Potential Effects

Based on these discussions, Yellowstone National Park has concluded the project as proposed would diminish the integrity of materials of the Mammoth Hot Springs Hotel. Therefore, we have determined that this project would have an adverse effect on this historic property. We are requesting your concurrence on this finding.

Preparation of a Memorandum of Agreement

Pending your concurrence with our determination of effect, the National Park Service (NPS) will prepare a Memorandum of Agreement (MOA), in consultation with the WYSHPO, with specific stipulations to mitigate for the installation of replacement windows on the Mammoth Hot Springs Hotel. By copy of this letter, the park is also notifying the Advisory Council on Historic Preservation (ACHP) of our adverse effect determination and our intent to develop a MOA between Yellowstone National Park and the Wyoming State Historic Preservation Office.

We appreciate working with you on our continued efforts for preservation of cultural resources in Yellowstone National Park. If you have any questions regarding this project, please contact Zehra Osman, Cultural Resources Specialist at (307) 344-2625, or zehra_osman@nps.gov .

Sincerely,

Daniel N. Wenk
Superintendent

Enclosures

1. Copy of November 8, 2017 consultation letter
2. Responses to 12/22/17 Questions Submitted by WYSHPO

bcc:

Central Files
Pat Kenney
Jennifer Carpenter
Tobin Roop
Kyle Meakins
Zehra Osman
Beth Horton
Herb Dawson
Dale Reinhart
Peter Galindo
Nancy Ward
Mike Finken
YCR Files

FNP:zosman:llh:2514:01/19/18



United States Department of the Interior

NATIONAL PARK SERVICE
YELLOWSTONE NATIONAL PARK
P.O. Box 168
Mammoth, Wyoming 82190-0168



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CERTIFIED RETURN RECEIPT

Ms. Mary Hopkins
Wyoming State Historic Preservation Office
Barrett Building, 3rd Floor
2301 Central Avenue
Cheyenne, Wyoming 82002

Subject: Section 106 Review for Proposed Guest Wing Rehabilitation and Seismic Stabilization of the Mammoth Hot Springs Hotel (HS-2025), Mammoth Hot Springs Historic District (48YE486), Yellowstone National Park, Wyoming (PEPC #76028)

Dear Ms. Hopkins:

Yellowstone National Park (YNP) proposes to implement the second phase of an interior and exterior rehabilitation to the Mammoth Hot Springs Hotel, a building that contributes to the significance of the Mammoth Hot Springs Historic District. This project constitutes an undertaking as defined in 36 CFR §800.16(y), the implementing regulations for the National Historic Preservation Act. We request your review and concurrence on our identification of historic properties and determination of effects on those properties.

Area of Potential Effect (APE)

An aerial topographic map (Enclosure 1) delineates the Area of Potential Effects (APE), which is based on both direct and indirect (visual) effects. Mammoth Hot Springs Hotel (HS-2025) is a contributing resource within the Mammoth Hot Springs Historic District (48YE486). The proposed guest wing rehabilitation would be visible from the adjacent Fort Yellowstone National Landmark District (48YE1057) and Grand Loop Road Historic District (48YE520).

Mammoth Hot Springs Hotel (HS-2025) is part of a complex that includes a dining hall, recreation hall, employees' dormitories, cabins, and auxiliary buildings. It lies at the base of a steep hillside at the north edge of a terrace, just north of the Grand Loop Road Historic District. Visually prominent due to their central location and massive size, the 1936 hotel, dining hall, and recreation buildings represent Yellowstone Park Company architect Robert Reamer's solution to updating portions of the old Mammoth Hotel. The four-story, L-shaped Mammoth Hot Springs Hotel consists of a 1913 guest room wing of the old Mammoth Hotel and a newer two-story front section with lobby and lounge erected in 1937. A curvilinear stair tower on the north side of the lobby forms the transition between the lower two floors of the wing and the newer lobby. Art

Moderne style ornamentation was used in the 1936 portion of the hotel. Colonial Revival style features were also utilized to relate to the 1913 hotel wing as well as the buildings of Fort Yellowstone. The focus of this phase of the rehabilitation is the 1913 guest room wing, which is a long, tall, rectangular, flat-roofed, four-story wood frame structure. The exterior is finished with wide horizontal shiplap siding. A cornice with a shallow overhang terminates the siding at the roof and a narrow water table base covers the area between the siding and the poured concrete foundation. Window openings are uniformly spaced on each of the elevations. The windows are one-over-one, double-hung. There are decorative panels between the head of the third floor windows and the sill of the fourth floor windows. There is an original enclosed stair serving each floor located at the north end and a modern enclosed stair addition on the west side of the wing. Additional architectural characteristics of this wing are described in the 2015 Historic Structure Report (Enclosure 5).

Mammoth Hot Springs Historic District (48YE486) was listed on the National Register of Historic Places on March 20, 2002. According to the National Register of Historic Places Registration Form, the Mammoth Hot Springs Historic District has statewide significance as the administrative and concession headquarters of the largest national park in Wyoming. Its period of significance is 1891 to 1948. The district is significant under Criterion A for its historical association with the development of Yellowstone National Park, and more specifically, with the development of administrative and concession policies in Yellowstone and the national park system. The district's location near the Mammoth Hot Springs Terraces and at the juncture of the first entrance road to the park resulted in its selection as the location for the first park administrative headquarters and the first concessions area in the first national park in the United States. Mammoth Hot Springs Historic District is also significant under Criterion C for its architecture. Fort Yellowstone, within the district, reflects the layout and architecture of a typical western army fort of the late-nineteenth century. Buildings erected after the military era in the administrative area of the district are significant for their representation of the work of National Park Service architects and landscape architects. The concession area buildings are notable for their reflection of the evolution of park commercial architecture from the late-nineteenth through the mid-twentieth centuries. Included within the district are concession buildings that are excellent representatives of Colonial Revival, Rustic, Prairie, and Art Moderne styles. The work of architects hired by concessioners, including Robert C. Reamer and Fred Willson, is also represented in the district.

The proposed project would be adjacent to and visible from the Fort Yellowstone National Landmark Historic District (48YE1057), which was designated as a National Historic Landmark on July 31, 2003. The National Historic Landmark Nomination Form states that Fort Yellowstone is significant under Criterion 1 for its association with the military administration of Yellowstone National Park, and for the impact the principles and policies developed during the military administration of Yellowstone had on the emerging conservation and national park movements in the United States from 1881 to 1918 – from the date of the earliest extant resources associated with the military period to the permanent departure of U. S. Army troops.

The Mammoth Hot Springs Hotel is also adjacent to and visible from the north side of the Grand Loop Road Historic District (48YE520). In meeting Criterion A, the Grand Loop Road is significant at the national level as the first large-scale designed national road system constructed

at a time when road building was a new concept. The logistics and techniques devised by the U.S. Army Corps of Engineers to construct the road in remote, difficult mountainous terrain were both bold and unique. The Grand Loop Road is also significant at the state level under Criterion A, as it is important in the development of the entrance roads and the park's gateway communities. In meeting Criterion B, the Grand Loop Road is significant for its association with Engineering Officer Hiram Chittenden, in charge of constructing the road, for his visionary role in the development of the road system in Yellowstone National Park, for his role in the development of the design philosophy of National Park Service roads, as well as his important contributions to the history of the American West. In meeting Criterion C, the Grand Loop Road represents the continuing design philosophy that blends the road with the natural setting and lies lightly on the land. The use of natural materials to construct the historic bridges harmonizes the manmade features with the surrounding environment.

The park completed a cultural resources inventory for this area in 1995 and 2009 (Sanders et al. [1996] The 1995 Class III Cultural Resource Inventory of the Mammoth to Norris Junction Road, Yellowstone National Park, Project 254G.; Sanders et al. [2009] 2009 Class III Cultural Resource Block Inventory of Portions of the Mammoth-Gardiner Developed Area, Yellowstone National Park, Wyoming and Montana). No archaeological resources were identified within the proposed project and staging areas.

Previous Project Phases

In July of 2015, YNP consulted with your office regarding the rehabilitation of historic structure #2051, the Haynes Studio (SHPO #0715MKR007). The concessionaire relocated their offices to the Haynes Studio building from the Mammoth Hot Springs Hotel in 2016. This allowed the repurposing of the historic office area on the second floor above the hotel lobby as new ballroom/conference rooms as part of *Phase I Rehabilitation and Seismic Stabilization of the Mammoth Hot Springs Hotel* (SHPO #1215BAB010 12/22/2015). Phase I also involved rehabilitation of the primary public portion of the hotel, which includes the gift shop, lobby, porte cochere, and Map Room as part of the seismic stabilization.

Current Proposed Undertaking

The guest wing of the Mammoth Hot Springs Hotel does not meet current seismic standards and is in danger of severe damage or possible collapse in the event of an earthquake. Phase II of this project involves the seismic stabilization and rehabilitation of the 1913 guest wing. The structural seismic system would be upgraded for lateral shear strength and moment frames would be installed, which would require the in-kind removal and replacement of certain walls, floors, ceilings, and roof areas. Please see the enclosed *Project Description and Justification* and the *95% Construction Documents* for more details (Enclosure 3, 4 and 5).

Interior Rehabilitation: The seismic structural upgrades would involve opening wall, floor, and roof areas, which would allow for the insertion of upgraded building systems. This project would correct electrical, mechanical, seismic, thermal, fire/life/safety, and ABAAS deficiencies in the guest wing.

1. Guest wing corridors on each of the four floors, which are considered primary public spaces, would retain their original plan and volume and interior finishes for walls, trim,

floors, doors, transom windows, lighting fixtures, and ceilings. Transom windows would remain non-operable and filled in to meet the required fire rated corridors.

2. The floor plans of guest rooms would be reconfigured and the number of guest rooms would be reduced in order for each guest room to receive a full bathroom (thereby eliminating community bathrooms in the hall). Bathrooms finishes (tile, fixtures) would be upgraded with compatible materials. There are three to four historic bathrooms on each floor. For most of these, claw foot tubs and fixtures would be restored.
3. Some rooms would be combined to create suites and ABAAS accessible rooms on each floor.
4. Finishes in the rooms would be replaced-in-kind (new sheetrock with a plaster finish on the walls and ceiling, carpeted floors, repair and/or replacement of existing trim). In order to preserve as much of the historical hallway wall finishes and fabric as possible, all seismic, mechanical, electrical, and plumbing work would be executed on the room-side of the walls that are common with the hallways.
5. A new hot water heating system with an efficient two pipe thermostatic control would replace the room heating units and one-pipe radiators. New compatible radiators would replace historic radiators within the guest wing corridors (see Enclosures 5 and 7).
6. A new electrical system would be installed, including rewiring and restoration of the historic light fixtures, adding compatible new lighting to the rooms, additional emergency lighting and new distribution panels.
7. The windows in each room would be replaced-in-kind for energy efficiency and passive ventilation (See Enclosures 5 and 6).
8. Insulation would be installed in the walls and ceilings for energy efficiency and to reduce sound transmission.
9. The outdated fire detection and fire suppression systems would be replaced to meet current NFPA Life Safety codes.

Exterior Rehabilitation:

1. A new compatible enclosed stairway and elevator addition would replace the existing incompatible modern enclosed stairwell on the west elevation.
2. Siding, cornice, decorative panels, and roof would be repaired or replaced in kind.
3. There are 172 windows along the east and west elevations of the guest wing. Many of the existing windows have rotted sills and bottom sashes (See condition assessment in HSR - Enclosure 5). They do not provide good insulation in either summer or winter. While some character-defining windows were preserved and restored along the circular staircase in the previous rehabilitations, all 172 existing guestroom windows along the east and west elevations would be replaced-in-kind during Phase II activities. Window openings, locations, decorative panels, and trim would remain in order to retain the uniformly spaced historic appearance. The windows will be the typical double hung configuration to match the historic condition. Please see supplemental photos (Enclosure 5 and 6).

Site Work:

1. Parking areas and walkways would be redesigned to improve accessibility to the new stair and elevator addition on the west side of the building.
2. Cottonwood trees along the guest wing foundation that are in failing health would be replaced with new deciduous trees.

3. A new 10' deep x 8' diameter drain sump would be located in the northeast area of the new parking spaces on the west side of the hotel. It will have a 1.5' x 2' drop inlet located in the gutter pan.
4. New water lines would tie into the existing water main in the access road to the north of the hotel.

Determination of Potential Effects

Using the findings of the enclosed 2015 Historic Structure Report, this project has been designed by historical architect Jim McDonald of A&E Architecture to be in accordance with the recommendations of the Secretary of the Interior's Standards for Treatment of Historic Properties. Accordingly, the National Park Service has determined that this project would not alter any of the characteristics of the Mammoth Hot Springs Hotel, Mammoth Hot Springs Historic District, Fort Yellowstone National Historic Landmark District, or the Grand Loop Road Historic District in a manner that would diminish the integrity of the properties' location, design, setting, workmanship, feeling, and association. During inventory, no archaeological resources were identified within the proposed project. Therefore, we have determined that this project would have no adverse effect on historic properties and we seek your concurrence on these findings.

If you have any questions, please contact Zehra Osman, Cultural Resources Specialist at (307) 344-2625 or by email: zehra_osman@nps.gov.

Sincerely,

Daniel N. Wenk
Superintendent

Enclosures 8

bcc:
Central Files
Supt File
Jennifer Carpenter
Tobin Roop
Kyle Meakins
Zehra Osman
Beth Horton
Herb Dawson
Dale Reinhart
Peter Galindo
YCR Files

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