



FINDING OF NO SIGNIFICANT IMPACT

Cedar Pass Development Concept Plan and Environmental Assessment

Badlands National Park, South Dakota

INTRODUCTION

In compliance with the National Environmental Policy Act of 1969 (NEPA), the regulations of the Council on Environmental Quality for implementing NEPA (40 Code of Federal Regulations [CFR] 1500-1508), and NPS Director's Order 12, *Conservation Planning, Environmental Impact Analysis, and Decision-making*, the National Park Service (NPS) prepared a development concept plan / environmental assessment to analyze alternative actions and environmental impacts associated with the proposed project to redevelop and improve visitor experience, management capabilities, and facilities in the Cedar Pass area of Badlands National Park (the park). The 215-acre project area includes the Ben Reifel Visitor Center; park administrative buildings; park employee housing; the Cedar Pass Lodge and associated outbuildings and cabins; the operational support area; a maintenance area; and the park amphitheater and campground. While the maintenance area is included in the overall project area, this development concept plan / environmental assessment does not address future construction or substantial renovations to these facilities, and as such, this document does not include the maintenance area in its description of environmental conditions and evaluation of impacts. The statements and conclusions reached in this finding of no significant impact (FONSI) are based on documentation and analysis provided in the development concept plan / environmental assessment and associated decision file. To the extent necessary, relevant sections of the development concept plan / environmental assessment are incorporated by reference below. A non-impairment determination is included in Attachment A.

BACKGROUND

Badlands National Monument in South Dakota was recognized as a significant area when the United States Congress authorized its establishment in 1939. The monument encompassed approximately 110,000 acres of the South Dakota badlands. The monument was expanded by 133,000 acres in 1968, and it was re-designated as Badlands National Park in 1978. The park's significant features include outstanding scenic vistas and unique landforms of the White River Badlands, its importance to the science of paleontology, its natural resources, and preservation of archeological and cultural history.

The park is located 70 miles from Rapid City, South Dakota, and is split into two main units (north unit and south unit). The *Badlands National Park, North Unit Final General Management Plan* zones the Cedar Pass area for future development and identifies it as the principal area for visitor contact and park administration (NPS 2006a). The Cedar Pass development concept plan fulfills a park planning priority for resource preservation, facility asset management, and visitor use management at the park and serves as a component of the park's planning portfolio. The park's north unit planning portfolio consists of the individual plans, studies, and inventories, which together guide park decision making. The planning portfolio enables the use of targeted planning documents (such as this one) to meet a broad range of park planning needs and fulfill legal and policy requirements. The 2006 *Badlands National Park, North Unit*

Final General Management Plan remains a critical piece of the park's planning portfolio and will continue to be updated and/or supplemented in a timely manner through the development of additional park planning documents. At the time of publication, there is no timeline for implementation of the development concept plan; the plan is intended to provide a blueprint for the next 50 years. The development concept plan will likely be implemented incrementally over time, as funding allows.

PURPOSE OF AND NEED FOR THE ACTION

The purpose of this project is to improve visitor experience, management capabilities, and park facilities at the Cedar Pass area by creating a plan for redevelopment of this area that is consistent with the character-defining aspects of the associated historic district and cultural landscape and will protect the fragile resources in the area. The redevelopment plan will identify these needs and determine how they can be accommodated at the Cedar Pass area.

The proposed project is needed because current visitor and employee facilities at the Cedar Pass area do not meet the needs of visitors, the concessioner, or the park. A development concept plan is needed to address these and future development needs within the context of the park's resources and engineering limitations. The Cedar Pass area is the primary visitor center in the park, with the earliest facilities constructed during the early to mid-20th century. These facilities were influenced by New Deal era infrastructure and the NPS Mission 66 program. Over time, the existing facilities have become inadequate for various reasons. The facilities lack office space and housing for park employees, and the existing temporary buildings installed to alleviate these problems have reached the end of their useful life. Visitor amenities, such as the visitor center, lodging, campground, parking, and traffic circulation cannot accommodate increased visitation and changing visitor needs. The concessioner operates from one of the oldest buildings in the Cedar Pass area that has developed structural issues; is in need of costly repairs; and presents life, health, and safety issues. These issues make servicing the park and visitors difficult.

ALTERNATIVES CONSIDERED

The development concept plan / environmental assessment considers a no action alternative and three action alternatives. These alternatives are briefly summarized below. See pages 15–49 of the development concept plan / environmental assessment for the full description of each alternative.

ALTERNATIVE 1 (NO ACTION)

Under the no-action alternative, the National Park Service would continue to operate and maintain the existing facilities at Cedar Pass in their existing conditions, configurations, and locations.

ALTERNATIVE 2

Alternative 2 would preserve and restore the Mission 66 features to provide a visitor experience that emphasizes the “Roadside America” approach and calls attention to the views of the landscape. The approach to future development under this alternative would focus on rehabilitating existing structures consistent with Mission 66 and would limit the amount of new construction within the Cedar Pass area. With the exception of the two new southern tent camping loops south of the existing camping area and the NPS recreational vehicle (RV) pads located south of the operational support area, all proposed development under alternative 2 would occur within previously disturbed areas.

ALTERNATIVE 3

Alternative 3 would emphasize protection of the spatial definition of the Mission 66-era cultural landscape in the approach to site layout and design. Functions within Cedar Pass would be consolidated into a number of buildings in the historical visitor center / administration cluster and in the operational support area. The visitor center and some administrative functions would be consolidated into a single building, while other administrative functions would be relocated to the operational support area to limit the development footprint in any cluster in favor of restoring the spatial definition of development clusters. All proposed development under alternative 3 would occur within previously disturbed areas.

ALTERNATIVE 4 (SELECTED)

Alternative 4, the selected alternative, will redefine the Cedar Pass experience, primarily through new facility development and facility siting choices that will optimize visitor interactions with park resources. The approach to future development under this alternative will emphasize new construction that is compatible with the Mission 66-era historic structures that will remain while incorporating state-of-the-art architectural design features and enhancing visitors' views of the Badlands Wall and other natural resources of the park. All proposed development will occur within the Cedar Pass Development Zone as defined in the *Badlands National Park, North Unit Final General Management Plan*. With the exception of the visitor center and two new tent camping loops south of the existing camping area, all proposed development under alternative 4 will occur within previously disturbed areas.

Visitor Center

The visitor center function will be relocated to a new approximately 15,000-square foot (SF) building on the south side of Badlands Loop Road in a previously undisturbed area between the Cedar Pass Lodge and the existing Ben Reifel Visitor Center. Large, north-facing windows will immerse visitors in the Badlands landscape. Visitor and staff parking associated with the visitor center will be relocated to a new parking lot with 129 vehicle stalls. Bus and RV parking will be accommodated in two parking lots along Ben Reifel Road containing 6 bus stalls and 12 RV stalls total.

Headquarters and Administrative Functions

With the construction of a new visitor center, the existing 12,365-SF visitor center will be renovated and rehabilitated to accommodate the administration/management and paleontology teams. The Mission 66 façade will be restored, and the parking lot will be widened by 10 feet to improve maneuverability for large vehicles. The bioscience team and resource protection/ranger station team will be relocated to a new approximately 5,500-SF building in the operational support area. A large expanse of vegetated open space between the headquarters development cluster and housing development cluster will partially restore the natural flow of surface water and increase stormwater infiltration and retention.

Park Staff Housing

Housing for NPS and concessioner staff will be located within the historic housing development cluster at Cedar Pass and will consist of 10 permanent employee housing units in 6 historic and 1 non-historic single-family homes (including the historic superintendent's house) and 1 new triplex building; 12 apartment units for park staff in 3 historic buildings; 24 new apartment units for seasonal employees in 3 new buildings; and 15 new apartment/shared units for seasonal concessioner employees and 2 new single-family units for permanent concessioner employees in 2 new buildings. The single-family house #34 and garage will be rehabilitated as a community building with new amenities, including a fitness room that currently occupies part of the building 12 garage. This alternative will retain 7 RV pads in their current

location to facilitate the participation of staff and volunteers living in RVs in staff life and promote a stronger sense of community.

Cedar Pass Lodge

Under the selected alternative, the 1938 lodge building, including all later additions and the basement will be demolished. A new main lodge, totaling approximately 12,000 SF, will be constructed in the same location as the existing lodge but with a slightly larger footprint. While the main lodge building will not contain a basement, there will be a space taller than a crawl space, with a dirt floor to allow easy access to the utility infrastructure of the building. A 2,500-SF lodge check-in building that will incorporate salvaged elements of the 1938 lodge will be constructed to the west of the lodge and the historic ice house. Visitor and staff parking in this development cluster will total between 56 and 58 visitor and staff stalls; RV and bus parking will be accommodated in 30 RV/bus stalls or a 120-foot space. Lastly, 10 new cabins, composed of 15 additional units, will be constructed in a new cabin court.

Campground and Amphitheater

Under the selected alternative, the camping area will be expanded to contain 128 campsites and cabin sites—28 electric small RV pull-through sites, 21 electric large RV pull-through sites, 70 individual tent-only sites, 4 group tent campsites, and 5 camper cabins. The expanded campground program will be accommodated along two new loop roads south of the existing campground loops. Tent sites currently within the floodplain and in danger of collapsing into the adjacent stream will be relocated, and native trees and vegetation will be planted to slow erosion and to provide shade and privacy for the tent sites. The dump station will be relocated adjacent to the entry kiosk. The selected alternative will provide 5 restroom facilities to accommodate 1 restroom per 25 camp sites, and 1 new shower facility will be constructed close to the small RV and tent sites.

The amphitheater will be reoriented to match the original Mission 66 orientation and expanded to seat 350 people and provide universal access. Screening adjacent to the rear of the amphitheater will be added to block light pollution from Highway 377 during nighttime programming. The interpretive shelter will be demolished, and a larger structure that includes space for picnicking and an outdoor classroom will be built in the same location. The parking lot at the amphitheater will retain its current orientation and size with 54 vehicle stalls, and will not accommodate RV or bus parking.

Trails and Multimodal Access

Under the selected alternative, a network of 10-foot wide multiuse trails for pedestrians and bicyclists will be constructed to link development clusters. The existing social trail between the employee housing area and operational support area will be formalized, and multiuse trails will be added to link the employee housing area with the visitor center and park headquarters. Bicycle and pedestrian traffic will be separated from vehicular traffic to the maximum extent practicable to ensure visitor safety and limit potential conflicts between vehicle and pedestrian/bicycle movements. At intersections of these multiuse trails and the vehicular road network, Architectural Barriers Act-compliant curb cuts, marked crosswalks, and signage will be installed to ensure visitor safety. All new trails and pedestrian infrastructure will be composed of concrete or stabilized soil that meet Architectural Barriers Act Accessibility Standards. Additionally, a bicycle lane will be added along the south side of Badlands Loop Road through the Cedar Pass area, requiring the expansion of this road by an additional 5 feet. Bicycling will be discouraged outside the designated bicycle lane and the multiuse trails both for visitor safety and to protect park resources from accelerated weathering and erosion. Lastly, a new interpretive trail will be built north of Badlands Loop Road. It will extend beyond the Cedar Pass area and provide a connection between Cedar Pass and external park resources.

BEST MANAGEMENT PRACTICES AND MITIGATION MEASURES

To prevent and minimize environmental impacts related to the selected alternative, the National Park Service will incorporate best management practices and mitigation measures into design plans and specifications to be implemented during the construction and post-construction phases of the project. General and resource specific best management practices and mitigation measures are listed below by impact topic. This list provides a framework for mitigation measures that will be included in the contractor's specifications. Mitigation measures will continue to be refined as the design of the project develops and as permit conditions are defined by the regulatory agencies.

GENERAL

- Clearly state all resource protection measures in the construction specifications and instruct workers to avoid conducting activities outside the project area. Limit disturbances to roadsides, culvert areas, and other areas inside the project area.
- Hold a pre-construction meeting to inform contractors about sensitive areas, including natural and cultural resources.
- Delineate construction zones outside existing disturbed areas with flagging and confine all surface disturbance to the construction zone.
- Site staging and storage areas for construction vehicles, equipment, materials, and soils in previously disturbed or paved areas approved by the National Park Service. Locate these areas outside high visitor use areas and clearly identify them in advance of construction.
- Require contractors to properly maintain construction equipment to minimize noise and do not allow construction vehicle engines to idle for extended periods.
- Remove all tools, equipment, barricades, signs, and surplus materials from the project area upon completion of the project.

STORMWATER AND FLOODPLAINS

- Incorporate alternative pavement treatments, such as pervious concrete, porous asphalt, permeable pavers, or cellular grassed paving in a concrete or plastic matrix to improve stormwater infiltration and reduce run-off.
- Comply with and meet all relevant requirements under the Clean Water Act, Executive Order 11988, Director's Order 77-2, and *NPS Management Policies* 2006, as well as all other applicable regulations and policy guidance, including management of stormwater-related non-point source pollutants under the National Pollutant Discharge Elimination System. Prepare and implement a stormwater pollution prevention plan for construction activities to control surface runoff, reduce erosion, and prevent sedimentation of surface waters.
- Create a stormwater management plan during the design process to include more detailed hydrologic studies, flood control plans, and drainage plans for new construction, as well as additional avoidance, minimization, and mitigation measures based on future engineering and design work. Include a detailed floodplain analysis in the stormwater management plan that will provide design criteria for preliminary and final construction plans and diagrams.
- Incorporate new facilities and infrastructure into the existing storm water drainage system.
- Implement best management practices for drainage and sediment control to prevent or reduce nonpoint source pollution and minimize soil loss and sedimentation in drainage areas. These

practices may include, but are not limited to, silt fencing, filter fabric, temporary sediment ponds, check dams of pea gravel-filled burlap bags or other material, and/or immediate mulching of exposed areas to minimize sedimentation and turbidity impacts as a result of construction activities. Do not use plastic materials. Leave erosion control measures in place at the completion of construction to avoid adverse impacts on water resources, after which time NPS staff will be responsible for maintenance and removal.

- Perform construction activities with caution to prevent damage caused by equipment, erosion, siltation, or pollutant discharges.
- Complete and implement a spill prevention, control, and countermeasures plan for any fuel storage tanks that meets all applicable standards for construction and leak detection. Limit areas used for refueling to areas where these activities currently occur.
- Frequently check equipment containing fuels for leaks.
- Install infiltration basins or other appropriate stormwater management and low impact development practices, to control the additional stormwater runoff caused by the increase in impervious surfaces.

VISITOR EXPERIENCE AND SAFETY

- Require the construction contractor to follow NPS construction contract standards during construction, including implementation of an accident prevention program, installation of warning signs at the construction site and along the nearby parking lot, and installation and maintenance of construction fences around the construction sites to prevent non-contractors and the public from entering the construction areas.
- Inform visitors in advance of construction activities via a number of outlets, including the park's website, various signs, the visitor center, and bus and shuttle drivers.
- To the extent practicable, schedule work to avoid construction activity and construction-related delays during peak visitation.
- Ensure that pedestrian crossings in parking lots and driveways have appropriate signage and pavement striping to minimize the potential for pedestrian-vehicle conflicts.
- Develop provisions for emergency vehicle access through construction zones.
- Implement either a flashing pedestrian sign or LED-illuminated sign for the proposed crosswalk at Highway 240 (Badlands Loop Road) to ensure safe passage for pedestrians along this heavily traveled roadway that serves tourists and local farm trucks.
- Develop pedestrian walkways/trails around parking areas at Cedar Pass Lodge and amphitheater to provide safe passage for pedestrians past these parking lots.
- Add a pedestrian walkway/trail adjacent to proposed visitor and parking area serving the new Ben Reifel Visitor Center that connects the visitor center to the bus/RV parking area and include a flashing pedestrian sign or LED-illuminated sign at a Highway 240 crossing and bus/RV parking lot crossing to improve pedestrian safety.
- Develop pedestrian walkways/trails within and between campsites and the amphitheater to provide an interconnected pedestrian network between the campsites and visitor center.
- Implement a parking management plan to reduce vehicle use by employees by providing one parking space in a central location at Cedar Pass and encouraging employees to walk or use a bicycle to access their work location at Cedar Pass or use a motor pool vehicle if their work

location is more than a 0.5 mile away (10-minute walk). Experiment by reducing the number of employee spaces below a 1:1 ratio to reduce the number of non-tourist vehicles accessing the park and assign an area to handle the overflow until the right balance of parking demand and capacity are equal.

- Require that all tourist bus companies schedule their arrivals and departures to minimize tour bus traffic and help the park ensure that available parking matches the daily tour bus peak demand.
- Create a one-way flow through parking areas serving the Cedar Pass Lodge parking area and parking area located north of existing visitor center to reduce confusion for drivers and pedestrians and provide a safer environment.
- Plant additional trees and vegetation between the proposed visitor center and the Cedar Pass Lodge cabins to minimize the visual impacts of the visitor center and avoid adverse impacts on the visitor experience.

CULTURAL LANDSCAPES

- No mitigation measures for cultural landscapes are anticipated; however, mitigation measures may be determined as part of the section 106 process

HISTORIC STRUCTURES

- Engage a qualified architectural historian to document historic or important structures (e.g., Mission 66 era) before demolition or alteration, if necessary.
- Oversee every stage of construction activities to ensure that contractors do not unduly disrupt the historic fabric.
- Ensure that any architectural development in the Cedar Pass area is compatible with the historic structures or any historic district that is proposed, as appropriate.
- Conduct on-going tribal consultation for the proposed undertaking.
- Identify appropriate measures to mitigate any adverse impacts through consultation with the South Dakota State Historic Preservation Office under section 106 of the National Historic Preservation Act.
- Salvage elements of the 1938 lodge and incorporate in the construction of a new lodge check-in building.

PALEONTOLOGICAL RESOURCES

- Conduct pre-construction surveys by a paleontologist prior to excavations into the Brule Formation for all foundations of expanded and new buildings in the project area, in accordance to NPS *Management Policies 2006* (NPS 2006b) and the *Badlands National Park, North Unit Final General Management Plan* (NPS 2006a). Through this process, paleontological resources will be documented, collected, and properly cared for before construction begins.
- A qualified paleontologist will be on-site during any ground-disturbing construction activities in the Cedar Pass area, as part of a construction monitoring program (Benton et al. 2014). If resources are discovered during construction, work in that location will be stopped until the resources are properly recorded and evaluated. Appropriate measures will be taken to avoid further resource impacts or to mitigate their loss or disturbance.

- Reduce stormwater runoff from the new and rehabilitated facilities and associated parking areas to the extent possible by appropriate best management practices to avoid erosion that could affect paleontological resources.
- Provide appropriate drainage of the area between the expanded amphitheater and the base of the adjacent butte to avoid an increase in erosion and an increased risk of landslides of the butte wall.
- Implement appropriate educational, monitoring, law enforcement, and other management activities to mitigate the risk of intentional and unintentional disturbance within the Cedar Pass area.

SIGNIFICANCE CRITERIA REVIEW

The intensity or severity of impacts resulting from implementing the selected alternative is evaluated using the ten criteria listed in 40 CFR 1508.27. Key areas in which impacts were evaluated include stormwater and floodplains, visitor experience and safety, cultural landscapes, historic structures, and paleontological resources. As defined, in 40 CFR 1508.27, significance is determined by examining the following criteria.

(1) Impacts that may be both beneficial and adverse; a significant effect may exist even if the NPS believes that on balance the effect would be beneficial.

The selected alternative will result in both beneficial and adverse impacts. Impacts on stormwater will be long term, direct and indirect, adverse from an approximately 5-acre increase in impervious surfaces within the Cedar Pass area. The visitor center will be located in a previously undisturbed area adjacent to the main drainage channel through Cedar Pass, and approximately 0.4 acre of land proposed for the parking lot and multiuse trails associated with the new visitor center is within the known flood zone and is at risk for potential flooding. The quality and quantity of stormwater entering the main drainage channel from the east will be improved by restoring natural drainage patterns south of the proposed headquarters building, which will have long-term beneficial impacts. This area will be converted to pervious open space that will allow for infiltration and retention of stormwater runoff from the adjacent buttes and reduce floodwater volume and velocity into the main drainage channel. There will also be beneficial impacts resulting from the relocation of tent sites currently within the floodplain and in danger of collapsing into the adjacent stream. These impacts will not be significant because the National Park Service will implement the best management practices for stormwater and floodplains described above. Drainage and hydrologic studies will be performed during the design of the proposed visitor center to identify appropriate flood control and stormwater management strategies that will convey water away from the new facility while avoiding erosion and sediment accretion in the drainage channel and reducing flood risks to downstream park assets such as the Cedar Pass Lodge cabins.

Impacts on visitor experience and safety will be largely beneficial. The visitor experience at Cedar Pass will be improved by adding amenities, increasing facility capacity, and enlarging and enhancing indoor and outdoor space for park programming and other interpretive activities in the visitor center, Cedar Pass Lodge, and campground and amphitheater development clusters. Visitor safety will be improved because all existing vehicle-vehicle conflicts will be remedied, and the number of pedestrian and vehicle conflict locations will be reduced from four to two. Long-term, adverse impacts on visitor experience and safety will result from the removal of RV stalls and some individual tent sites and increased distances between the bus and RV parking and the visitor center. Visitors at the proposed visitor center who want to access parking and attractions to the east will need to cross a new 24-foot driveway, where vehicles and tour buses will be entering and exiting the facility, resulting in adverse impacts. Adverse impacts on visitor experience and safety will not be significant because visitor amenities and services will be enhanced and

existing safety concerns will be remedied. Adverse impacts will be localized and will only affect a small portion of visitors.

Impacts on cultural landscapes and historic structures will be largely beneficial. With the exception of the Cedar Pass Lodge, proposed construction and the renovation of existing facilities will adhere to the rehabilitation treatment in the *Cedar Pass Developed Area Badlands National Park Cultural Landscape Report* as well as the Secretary of the Interior's *Standards for the Treatment of Historic Properties*. This will preserve the integrity and character of the cultural landscape, resulting in direct, long-term, beneficial impacts. Demolition of the Cedar Pass Lodge and its replacement with compatible new construction will result in an adverse impact. This adverse impact will not be significant because elements of the 1938 lodge will be salvaged and incorporated in the construction of a new lodge check-in building. Additional measures to resolve this adverse impact have been identified in a draft programmatic agreement with the South Dakota State Historic Preservation Office under section 106 of the National Historic Preservation Act.

Ground disturbance and excavation under alternative 4 will result in adverse impacts on any extant paleontological resources. The risk of affecting intact paleontological resources is highest in the new visitor center and the new tent camping loops because these areas have not been previously disturbed. All areas subject to excavation will require pre-construction surveys for paleontological resources, and all construction activities will be appropriately monitored. These measures, along with the other best management practices and mitigation measures described above will reduce the potential for adverse impacts such that they are not significant.

(2) The degree to which the proposed action affects public health or safety.

During construction of the proposed facilities, temporary road and facility closures will keep the public away from areas where potentially harmful construction activities are occurring. Because the public will not be exposed to construction activities, the level of adverse effects from the proposed construction activities will not be significant. During the operation of the proposed facilities, the health and safety of park visitors and staff will be improved through the removal of all existing areas where vehicle movements conflict with other vehicle movements, and the reduction in pedestrian-vehicle conflict locations from four to two. Many roadways and parking areas in Cedar Pass will be widened and expanded to accommodate larger vehicles, and intersections will be designed to accommodate the turning radii of these larger vehicles. These improvements will also improve access and maneuverability for emergency vehicles throughout Cedar Pass, thereby protecting public health and safety.

(3) 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.

As described in the development concept plan / environmental assessment, the selected alternative will not affect wetlands, wild and scenic rivers, prime farmlands, or ecologically critical areas because those resources do not exist in the project area. While archeological sites do exist within the Cedar Pass area, none of the identified sites is considered eligible for the National Register of Historic Places (national register). If previously undiscovered archeological resources are uncovered during construction, all work in the immediate vicinity of the discovery will be halted until the resources are identified and documented and an appropriate mitigation strategy is developed in consultation with the State Historic Preservation Office, and in accordance with Director's Order 28A: *Archeology*, the National Historic Preservation Act, the Archaeological Resources Protection Act, and other applicable regulations.

Ground disturbance and excavation proposed under alternative 4 will have adverse impacts on any extant paleontological resources in the affected areas by unearthing these resources. In addition, indirect, adverse impacts could result from changes in the drainage patterns caused by proposed development, which could

expose paleontological resources through erosion processes. However, significant adverse impacts will be avoided because all areas subject to excavation will require pre-construction surveys for paleontological resources and any fossils that are encountered will be documented, collected, and properly cared for before construction begins. While rich accumulations of terrestrial vertebrate fossils can be found throughout the park, concentrating facilities' development within the Cedar Pass area, which is zoned for development per the *Badlands National Park, North Unit Final General Management Plan*, avoids significant impacts. Lastly, all construction activities will be appropriately monitored, which will reduce the potential for adverse impacts. Stormwater runoff from the new and rehabilitated facilities and associated parking areas will be reduced to the extent possible by appropriate best management practices to avoid erosion that could affect paleontological resources.

In addition to its vast paleontological resources, the Cedar Pass area contains a unique cultural landscape with elements from multiple periods of both private and federal efforts to provide visitor services and administer park functions. The Mission 66 initiative has left the most visible impact on the cultural landscape of Cedar Pass, which includes 57 historic structures, which contribute to the national register-eligible Cedar Pass Developed Area Historic District. Proposed development under the selected alternative will adhere to the rehabilitation treatment in the cultural landscape report to preserve the integrity and character of the cultural landscape, and result in beneficial impacts on cultural landscapes. However, there will be an adverse impact under alternative 4 from the demolition of the Cedar Pass Lodge. Working collaboratively with the South Dakota State Historic Preservation Office, mitigation measures have been determined as part of the section 106 process and documented in a draft programmatic agreement.

Additional mitigation measures and best management practices will be used to reduce the adverse impacts of the selected alternative on paleontological and cultural resources within the Cedar Pass area. Therefore, with mitigation measures and the use of best management practices, the level of adverse effects will not be significant.

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

Short-term, adverse effects on the quality of human environment will result during construction but are not anticipated to affect the quality of the human environment over the long term. The selected alternative provides beneficial effects on visitor use and experience through new interpretive multiuse pedestrian and bicycle trails, the proposed visitor center, improvements to the Cedar Pass Lodge, reconfigured and expanded parking areas, improvements to the amphitheater, and expansion of the campground. As evidenced by the public input during public outreach activities, beneficial and adverse effects on the human environment are not likely to be highly controversial or significant.

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

The activities under the selected alternative will not result in highly uncertain effects or involve unique or unknown risks. As presented in the environmental assessment and associated consultations under Section 7 of the Endangered Species Act (ESA; 87 Stat. 884, as amended: 16 *United States Code* [USC] 1531 et seq.) and Section 106 of the National Historic Preservation Act, as amended (54 USC 306108), and its implementing regulations (36 CFR 800), the potential impacts of the selected action on the human environment are well understood and are being mitigated, as appropriate. Furthermore, public input (as described below) did not identify any new or uncertain risks associated with the action. Therefore, the degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks will not be significant.

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

The selected alternative will not establish a precedent for future actions with significant effects, nor does it represent a decision in principle about a future consideration, because no significant effects have been identified, and all future actions will be analyzed and considered independently from the selected alternative.

(7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.

As described under criteria 1 and 3 above, with the implementation of mitigation measures and best management practices to reduce adverse impacts on stormwater and floodplains, cultural resources, and paleontological resources, the level of impacts will not be significant. When added to other past, present, and reasonably foreseeable future actions, as evaluated in the environmental assessment, the incremental impact of selected action will not result in a significant cumulative effect.

(8) The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on the National Register of Historic Places; or may cause loss or destruction of significant scientific, cultural, or historical resources.

The Cedar Pass Developed Area Historic District is a cultural landscape composed of a variety of contributing elements, including natural systems, spatial organization, land use, circulation, topographic modifications, vegetation, buildings, structures, small-scale features, views and vistas, and archeological resources. Twenty-seven buildings within the project area remain as contributing features to this historic district. Overall, proposed development under the selected alternative will adhere to the rehabilitation treatment in the cultural landscape report, preserve the integrity and character of the cultural landscape, and result in beneficial impacts on cultural landscapes. Most of the proposed alterations to historic structures, including the Ben Reifel Visitor Center and historic housing units will adhere to the rehabilitation treatment in the cultural landscape report as well as the Secretary of the Interior's *Standards for the Treatment of Historic Properties*, which will result in beneficial impacts. However, the demolition of the Cedar Pass Lodge and its replacement with compatible new construction will result in an adverse impact.

The National Park Service separately and concurrently prepared an assessment of effect to comply with the requirements of section 106 of the National Historic Preservation Act as amended (54 USC 306108) and its implementing regulations 36 CFR 800). The South Dakota State Historic Preservation Office responded on November 8, 2018, stating its concurrence of *Adverse Effect on Historic Properties*. Furthermore, the National Park Service is developing a programmatic agreement in consultation with the South Dakota State Historic Preservation Office to address the adverse effect.

(9) The degree to which the action may adversely affect an endangered or threatened species or its critical habitat.

The National Park Service determined that no federally listed threatened and endangered species or habitats are known to occur in the Cedar Pass area. In a letter dated September 19, 2018, the National Park Service requested concurrence for this "no effect" determination, which was received from the US Fish and Wildlife Service on October 1, 2018. Therefore, the selected alternative is not anticipated to have an adverse effect on federally listed and candidate species.

(10) Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment.

The selected alternative will not violate any federal, state, or local laws or requirements imposed for the protection of the environment.

PUBLIC AND AGENCY INVOLVEMENT

The development concept plan / environmental assessment was made available for public review and comment on the park website and the NPS Planning, Environment, and Public Comment website (<http://parkplanning.nps.gov/badl>) during a 48-day period beginning September 24, 2018. A hard copy of the development concept plan / environmental assessment is also available at the Ben Reifel Visitor Center. The park received several substantive comments during the public review period; the responses to which have been included in Attachment B.

Compliance with section 106 of the National Historic Preservation Act was carried out separately but concurrently with the planning process. In May 2018, the South Dakota State Historic Preservation Office and the National Park Service conducted a meeting at the park headquarters to discuss multiple projects including the Cedar Pass development concept plan. The State Historic Preservation Office provided input regarding actions that could ensure long-term preservation of cultural resources, as well as actions that will lessen potential adverse effects on cultural resources.

The park provided the South Dakota State Historic Preservation Office with a review copy of the development concept plan / environmental assessment to assist it in evaluating the potential effects of the proposed alternatives on cultural resources. On September 17, 2018, the National Park Service sent the South Dakota State Historic Preservation Office a completed section 106 project review form and attachments, which included a determination of adverse effect on historic properties from the demolition of the Cedar Pass Lodge and the location of the visitor parking lot in relation to the proposed visitor center. In a letter dated November 8, 2018, the South Dakota State Historic Preservation Office concurred with this determination of effect. In accordance with the provisions of section 106 of the National Historic Preservation Act, the National Park Service will continue to consult with the South Dakota State Historic Preservation Office and associated American Indian tribes to resolve the adverse effects resulting from the demolition of the historic Cedar Pass Lodge and the location of the visitor parking lot relative to the proposed visitor center.

FINDING OF NO SIGNIFICANT IMPACT

Based on the review of the facts and analysis contained in the environmental assessment, the National Park Service has selected alternative 4 for implementing the Cedar Pass development concept plan at Badlands National Park. The selected alternative will not have a significant impact either by itself or in consideration of cumulative impacts. Accordingly, the requirements of the National Environmental Policy Act, regulations promulgated by the Council on Environmental Quality, regulations promulgated by the Department of the Interior, and provisions of Director's Order 12 and the 2015 *National Park Service NEPA Handbook* have been fulfilled.

It is my determination that the selected alternative does not constitute a major federal action significantly affecting the quality of the human environment. Therefore, in accordance with NEPA and CEQ regulations (40 CFR 1508 et. seq.), an environmental impact statement is not required and will not be prepared for implementation of the selected alternative.

Recommended:


Michael Pflaum, Superintendent

1/29/2019
Date

Approved:


Craig Kenkel, Acting Regional Director
Midwest Region

1-30-19
Date

ATTACHMENT A: NON-IMPAIRMENT DETERMINATION

The National Park Service (NPS) *Management Policies 2006* require analysis of potential effects to determine whether actions would impair park resources. The fundamental purpose of the national park system, established by the Organic Act and reaffirmed by the 1916 General Authorities Act, as amended, begins with a mandate to conserve park resources and values. NPS managers must always seek ways to avoid, or to minimize to the greatest degree practicable, adversely impacting park resources and values.

However, the laws do give NPS managers discretion to allow adverse impacts on 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 parks, that discretion is limited by statutory requirement that the National Park Service must leave park resources and values unimpaired, unless a particular law directly and specially provides otherwise. The prohibited impairment is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources and values. To determine impairment, the National Park Service must evaluate “the particular resources and values that will be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts” (NPS 2006b).

This determination on impairment has been prepared for the NPS selected alternative described in the Finding of No Significant Impact. An impairment determination is made for all resource impact topics analyzed for the selected alternative. An impairment determination is not made for visitor use and experience because impairment findings relate back to park resources and values, and this impact area is not generally considered to be 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.

STORMWATER AND FLOODPLAINS

Preservation of flora, fauna, natural processes of Badlands National Park (the parks), as well as the mixed-grass prairie ecosystem, is part of the park’s purpose and significance. The mixed-grass prairie ecosystem is the largest contiguous native mixed-grass prairies under federal protection in the United States. The native wildlife and mixed-grass prairie of the northern Great Plains rely on healthy floodplains and sustainable stormwater patterns to thrive.

While there will be a 5-acre increase in impervious surfaces, the selected alternative will comply with and meet all relevant requirements of the Clean Water Act, Executive Order 11988, Director’s Order 77-2, and *NPS Management Policies 2006*; and will implement a variety of best management practices and mitigation measures that will minimize impacts on these resources. Drainage and hydrologic studies will be performed during the design of the proposed visitor center to identify appropriate flood control and stormwater management strategies that will convey water away from the new facility while avoiding erosion and sediment accretion in the drainage channel, and reducing flood risks to downstream park assets such as the Cedar Pass Lodge cabins. The area south of the proposed headquarters building will be converted to open prairie that will allow for infiltration and retention of stormwater runoff from the adjacent buttes and reduce floodwater volume and velocity into the main drainage channel. Restoring the natural drainage patterns south of the proposed headquarters building will improve the quality and quantity of stormwater entering the main drainage channel from the east. Therefore, the selected alternative will not impair stormwater or floodplains at the park.

CULTURAL LANDSCAPES

The cultural landscape is crucial to the park's purpose to preserve and interpret the history of use and settlement of lands within the park. The Cedar Pass Developed Area Cultural Landscape, composed of natural systems, spatial organization, land use, circulation, topographic modifications, vegetation, small-scale features, views and vistas, and archeological resources, is an important resource and value to consider in park planning. With the exception of the Cedar Pass Lodge, proposed development under the selected alternative will adhere to the rehabilitation treatment described in the cultural landscape report to preserve the integrity and character of the cultural landscape. New construction will be limited to meet critical park needs in accommodating visitor and staff requirements while repairing and protecting the historic fabric of structures, buildings, and other landscape features. New facilities and infrastructure will preserve the Mission 66 spatial organization, circulation, and views and vistas. The demolition of the historic Cedar Pass Lodge, including the 1938 core, and its replacement with historically compatible construction, will result in an adverse impact. This adverse impact will not impair the cultural landscape of Cedar Pass because the new visitor center will be compatible in location, materials, and massing with the historic context of Cedar Pass. Additionally, the National Park Service will identify mitigation measures for the demolition of the Cedar Pass Lodge through the section 106 process, in consultation with the South Dakota State Historic Preservation Office. In summary, the selected alternative will enhance the Cedar Pass cultural landscape, while mitigating the adverse impact from the demolition of the Cedar Pass Lodge in consultation with the South Dakota State Historic Preservation Office; therefore, the Cedar Pass Cultural landscape will not be impaired.

HISTORIC STRUCTURES

Currently, 27 historic structures contribute to the National Register of Historic Places (national register)-eligible Cedar Pass Developed Area Historic District. The preservation of these historic structures relates directly to the park's purpose to preserve and interpret the history of use and settlement of lands within the park, and is an important component of the Cedar Pass Developed Area Cultural Landscape, whose preservation is one of the park's important resources and values. Development within Cedar Pass originated as a commercial venture by Ben Millard and his sister to promote the White River Badlands as a destination. Millard worked with the National Park Service and other local interest groups to have the area set aside as a unit of the National Park Service. The Civilian Conservation Corp and National Park Service continued development in the area; during the Mission 66 era, Cedar Pass experienced substantial facilities development, including the construction of the Ben Reifel Visitor Center. The Cedar Pass area of today contains remnants from the Early Tourism Period, the Civilian Conservation Corps, and the Mission 66 development periods of the National Park Service.

Under the selected alternative, all historic structures except the Cedar Pass Lodge will be renovated and rehabilitated in accordance rehabilitation treatment described in the cultural landscape report and the Secretary of the Interior's *Standards for the Treatment of Historic Properties*. As described in the previous section, the adverse impact resulting from the demolition of the Cedar Pass Lodge will be resolved in consultation with the South Dakota State Historic Preservation Office, and the construction of a new lodge facility will be compatible with the historic context and cultural landscape of Cedar Pass. Therefore, the selected alternative will not impair historic structures at the park.

PALEONTOLOGICAL RESOURCES

Part of the park's purpose, significance, and fundamental resources and values is to preserve, interpret, and provide for scientific study of the paleontological resources of the White River Badlands. The park's paleontological resources provide insight into climatic history, biological diversity, evolution, and geological processes particular to the boundary between the Eocene and Oligocene epochs, as well as a

unique opportunity to trace the evolution of the prairie ecosystems of the Great Plains. The long history of research in the White River Badlands has contributed greatly to the science of vertebrate paleontology in North America.

Ground disturbance and excavation under the selected alternative will affect any extant paleontological resources. The risk of affecting intact paleontological resources is highest in the area of the new visitor center and the new tent camping loops because these areas have not been previously disturbed. All areas subject to excavation will require pre-construction surveys for paleontological resources in accordance with *NPS Management Policies 2006* (NPS 2006b) and the *Badlands National Park, North Unit Final General Management Plan* (NPS 2006a). Through this process, paleontological resources will be documented, collected, and properly cared for before construction begins (NPS 2006b). Additionally, a construction monitoring program will be implemented for all construction activities under the selected alternative. For any paleontological resources discovered during construction, work in that location will be stopped until the resources are properly recorded and evaluated, and appropriate measures will be taken to avoid further resource impacts or to mitigate their loss or disturbance.

Because paleontological resources discovered during the implementation of the selected alternative will be carefully surveyed and preserved for further study or inclusion in the park's museum collection, there will be no impairment of paleontological resources at the park.

SUMMARY

The National Park Service has determined that the implementation of the selected alternative (alternative 4) will not constitute an impairment of the resources or values of the park. As described above, implementing the selected alternative is not anticipated to impair resources or values that are essential to the purposes identified in the establishing legislation of the park, key to the natural or cultural integrity of the park, or identified as significant in the park's relevant planning documents. This conclusion is based on the consideration of the purpose and significance of the park, a thorough analysis of the environmental impacts described in the development concept plan / environmental assessment, relevant scientific studies, the comments provided by the public and others, and the professional judgment of the decision-maker guided by the direction of the National Park Service (*Management Policies 2006*).

ATTACHMENT B: RESPONSE TO PUBLIC COMMENT

1. **CONCERN STATEMENT:** (Concern ID: 60683) One commenter stated their support of alternative 2 based on the development approach for the visitor center; headquarters building, and Cedar Pass Lodge. The proposed rehabilitation of the visitor center would address space and circulation deficiencies for both staff and visitors while restoring the Mission 66 façade. The commenter also noted the benefit of creating a new headquarters building that would meet the stated needs as articulated in the space planning study and that would be off the main loop road. The commenter supported the approach to development at the Cedar Pass Lodge under alternative 2 because it would keep the 1938 core while addressing space and structural deficiencies. He/she further recommended that this alternative be modified to include the channel restoration elements from alternative 4 to address the potential impacts noted from an increase in impervious surfaces.

Response: While the commenter prefers alternative 2 because it meets the facility requirements and purpose and need of the environmental assessment, all of the action alternatives carried forward for detailed analysis also meet the space requirements and purpose and need, as required by the National Environmental Policy Act (NEPA). As part of its impact analysis, the National Park Service identified some adverse impacts but determined that alternative 4 meets the purpose and need, and addresses space planning needs while preserving and enhancing the Cedar Pass area's natural systems, spatial organization, historic buildings, and the cultural landscape. The rationale for selecting the preferred alternative is further described on page 66 of the environmental assessment. The National Park Service appreciates the suggestion to incorporate channel restoration elements from alternative 4 into alternative 2 to reduce impacts from stormwater runoff on impervious surfaces. However because the National Park Service selected alternative 4, which includes the channel restoration element, it has sufficiently analyzed this topic and will not include it in alternative 2.

2. **CONCERN STATEMENT:** (Concern ID: 60684) Commenters stated that the proposed location for the visitor center under alternative 4 is located in a drainage area and floodplain and requested that the National Park Service consider how this location would affect the care, maintenance, and longevity of the new facility.

Response: For all new development in the Cedar Pass area, including the proposed visitor center, drainage and stormwater management infrastructure will be designed to reduce the risk of flooding to park facilities while preserving or restoring the natural surface water flows and erosional processes of the area to the greatest extent practicable. The National Park Service will employ best management and low-impact development practices to make park facilities and infrastructure resilient to the potential increase in intense precipitation events in the future. The park will create a stormwater management plan during the design process, which will include detailed hydrologic studies, flood control plans, and drainage plans for new construction. The plan will also include additional avoidance, minimization, and mitigation measures based on future engineering and design work and a detailed floodplain analysis that will provide design criteria for preliminary and final construction plans and diagrams. The errata notes these additional flood control studies and measures that were not included in the DCP/EA.

Stormwater and floodplain mitigation measures include:

- Create a stormwater management plan during the design process to include more detailed hydrologic studies and drainage plans for new construction, as well as additional avoidance, minimization, and mitigation measures based on future engineering and design work.

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- Incorporate alternative pavement treatments, such as pervious concrete, porous asphalt, permeable pavers, or cellular grassed paving in a concrete or plastic matrix to improve stormwater infiltration and reduce run-off.
 - Incorporate new facilities and infrastructure into the existing stormwater drainage system.
 - Implement best management practices for drainage and sediment control to prevent or reduce nonpoint source pollution and minimize soil loss and sedimentation in drainage areas. These practices may include, but are not limited to, silt fencing, filter fabric, temporary sediment ponds, check dams of pea gravel-filled burlap bags or other material, and/or immediate mulching of exposed areas to minimize sedimentation and turbidity impacts because of construction activities. Do not use plastic materials. Leave erosion control measures in place at the completion of construction to avoid adverse impacts on water resources, after which time NPS staff will be responsible for maintenance and removal.
 - Perform construction activities with caution to prevent damage caused by equipment, erosion, siltation, or pollutant discharges.
 - Complete and implement a spill prevention, control, and countermeasures plan for any fuel storage tanks that meets all applicable standards for construction and leak detection. Limit areas used for refueling to areas where these activities currently occur.
 - Install infiltration basins or other appropriate stormwater management and low-impact development practices, to control the additional stormwater runoff caused by the increase in impervious surfaces.
 - Comply with and meet all relevant requirements under the Clean Water Act, Executive Order 11988, Director's Order 77-2, and NPS Management Policies 2006, as well as all other applicable regulations and policy guidance, including management of stormwater-related non-point source pollutants under the National Pollutant Discharge Elimination System. Prepare and implement a stormwater pollution prevention plan for construction activities to control surface runoff, reduce erosion, and prevent sedimentation of surface waters.

3. **CONCERN STATEMENT:** (Concern ID: 60685) Commenters requested the National Park Service reconsider the proposed size of the visitor center, noting the current proposal is too small to accommodate future growth. They requested that the facility design accommodate increasing visitation over the next 20-40 years. In particular, commenters were concerned that the space allocated for the paleontology laboratory and visitor center store were too small. One commenter suggested that an enlarged visitor center could house some administrative functions, and the bioscience team, resource protection, and ranger station functions be housed in the rehabilitated Ben Reifel Visitor Center, which would eliminate the need to construct an additional building in the fire cache area. The commenter felt this solution would reduce emergency response time to critical facilities, convenient guest interaction with the bioscience community, and (daily) oversight of the visitor experience by the NPS leadership team.

Response: The proposed new visitor center under alternative 4 (preferred alternative) will be approximately 15,000 square feet (SF). This initial estimate is based on the NPS Facility Planning Model; use of this model is standard practice to calculate the appropriate size for proposed facilities. However, use of this model is for initial planning purposes and is not intended to replace the need for a detailed facility programming effort by licensed design professionals. As the park works towards securing funding for construction design and implementation, it will further refine the model

to develop a true square footage estimate for the proposed new visitor center. This process will help the park provide a beneficial visitor experience while using appropriated funds responsibly.

4. **CONCERN STATEMENT:** (Concern ID: 60686) Commenters requested that park staff consider the architecture of proposed structures during the design process and aim for a “special architectural language and visitor experience” that would serve the functions of the park, welcome future visitors, and house important artifacts. In contrast, another commenter indicated that the emphasis in the development concept plan on a “grand” visitor center is an outdated concept that places too much importance on the facility instead of the visitor experience. He/she suggested the park focus on using digital media to reach visitors before they get to the park and discontinue constructing large, expensive visitor centers. Other commenters provided suggestions regarding how the visitor center under alternative 4 could function. One commenter suggested that the visitor center include the following elements: (1) high ceilings and large glass windows with multiple views of the Badlands landscape; (2) an information desk in the center of the main room to enable 360-degree interpretation; (3) seating adjacent to the windows; (4) adjustable shades on the windows in the theater; (5) exhibition and museum areas with interactive displays; (6) a large paleontology lab that can be viewed through a large glass wall; (7) large classroom spaces with an exit to an outdoor learning space; (8) office space behind the gift shop and theater along an outer wall that provide daylight into staff workspaces; (9) storage space; and (10) restrooms that are external to the visitor center, including the possible creation of an area across the parking lot containing restrooms, picnic areas, and water refill stations. Other suggestions included an interactive, state-of-the-art paleontology laboratory; office space; and a library in a new facility in the area between the lodge and the current visitor center. Commenters recommended modestly remodeling the existing visitor center interior to accommodate a bigger bookstore and more exhibits. One commenter suggested these changes because they would limit costs, reduce crowding, and create a walking mall between the facilities. Lastly, one commenter requested that minimal effort and cost should be directed toward preservation of Mission 66 facilities and suggested that the new facilities should complement the unique and natural characteristics of the surrounding area.

Response: Comments on the character of the architecture encompassed a range of viewpoints. The specific architectural response to the climate, landscape, and cultural heritage of the Badlands will be determined during the design process, in accordance with the principles outlined on pages 19 to 24 of the environmental assessment. These principles call for sensitivity to the geology, hydrology, cultural landscapes, and scenic values of the Cedar Pass area, particularly the spectacular views of the Badlands Wall. Building design will also follow NPS standards for sustainability, operational efficiency, and value. Many of the design elements suggested by commenters are included in the DCP/EA such as a large paleontology lab, ample lobby orientation space to enable interpretation, a larger sales floor for the bookstore, and architecture that emphasizes views of the resource. Throughout the design process, these elements will be balanced with the operational efficiency and sustainability of the facilities and compatibility with the existing Mission 66 cultural landscape.

The preferred alternative includes renovating the existing visitor center and constructing a new building between the existing visitor center and lodge. If future planning and design efforts determine that these buildings are better suited for functions other than those outlined in the DCP/EA, as suggested by the commenter, the footprints could be used for these other functions. However, the National Park Service has determined that constructing a new visitor center, rather than renovating the existing visitor center, will best provide the services the commenters are requesting. Feedback on the arrangement of functions within the visitor center and other design elements will be considered during the design process.

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5. **CONCERN STATEMENT:** (Concern ID: 60687) Commenters requested that the preferred alternative consider the night sky and take actions to minimize extraneous and unnecessary lighting, including night sky friendly lighting plans and retrofitting existing light fixtures.

Response: The preservation of the night sky is a goal of the park and is a requirement for all facility design according to the NPS architectural design standards. Dark sky preservation will be addressed in detail if the proposed facilities move into the design phase. Existing landscape lighting and parking lighting will be replaced as facilities and infrastructure are renovated and constructed, and will be designed to meet dark sky requirements. The errata notes the potential for adverse impacts under alternative 4 from the location of the proposed visitor center to the adjacent cabins and includes a description of how impacts will be avoided and minimized.

6. **CONCERN STATEMENT:** (Concern ID: 60688) One commenter requested that the National Park Service reconsider a dirt floor crawl space/access space because of the clay-based soils. Instead, the commenter suggested reevaluating the inclusion of a basement at the Cedar Pass Lodge, with attention directed to soil mechanics and moisture control, noting that a full basement that provides emergency shelter in severe weather could be a better choice.

Response: The existing lodge basement has been plagued by structural issues due to the expansive soils. The proposed crawl space will allow access to utilities; while the stability of the entire structure will be ensured through the use of vertical piers.

7. **CONCERN STATEMENT:** (Concern ID: 60689) One commenter expressed concern over the implementation of alternative 4, noting that the parking lots behind the current visitor center, which would become green space, were renovated in 2014 and that removing them and building new parking areas elsewhere would be a waste of fiscal resources. The commenter suggested that fiscal resources be put into rebuilding professional staff dedicated to understanding and protecting the resources for which the park was established, not a the construction of a new visitor center.

Response: The development concept plan is a long-term master plan for development at Cedar Pass, and the proposed facilities and infrastructure will be implemented in phases that will make best use of previous investments in facilities and infrastructure. The development proposed in the DCP may not be implemented for another 5 to 10 years, if not longer; therefore, phasing will be determined at a later date. The funding sources that will be used for the construction of the visitor center and associated infrastructure are separate from those used for professional staff development and retention; therefore, the proposed development at Cedar Pass will not adversely affect NPS efforts to train and retain professional staff to understand and protect park resources.

8. **CONCERN STATEMENT:** (Concern ID: 60691) Commenters expressed concern that the location of the visitor center in relation to the administrative building would create a variety of issues under the preferred alternative. One concern is that visitors would park in the staff parking area adjacent to the existing Ben Reifel Visitor Center/ proposed headquarters building, affecting both staff parking availability and visitor use of outdoor spaces intended for staff. Additional concerns include the safety of visitors crossing Ben Reifel Road and ability of visitors (particularly elderly visitors) to enjoy the natural resources if they are required to walk to a visitor center located farther away. The commenters also noted visitors are currently stopping at the Cedar Pass Lodge thinking it is the visitor center; these commenters are concerned that adding a new visitor center between the existing visitor center and Cedar Pass Lodge would create more confusion.

Response: The commenters' concerns regarding parking accessibility and access to park resources are a common challenge encountered by national parks. Under the preferred alternative, signage and

wayfinding aids will be installed to direct visitors to the parking areas and outdoor spaces designated for their use. The Cedar Pass Lodge, visitor center, and administrative buildings will also have signage to direct visitors to the appropriate facility. A portion of the staff parking area may be allocated to visitors stopping at the historic entry sign and flagpole (see DCP/EA, page 46). Visitor safety will be protected by installing appropriate signage and crosswalk pavement striping at pedestrian crossings on Ben Reifel Road (see DCP/EA, page 65). The accessibility of the visitor center to elderly visitors or those with limited mobility will be supported by a drop-off area at the proposed visitor center that will allow these visitors to avoid a longer walk to this facility. Visitors to Cedar Pass will continue to be able to access the resource from multiple locations along Badlands Loop Road, and visitor safety will be improved because crosswalks will be installed to enable safe passage across Badlands Loop Road (see DCP/EA, page 46). Therefore, the relocated visitor center will not change the overall accessibility of the resource to visitors to Cedar Pass.

9. **CONCERN STATEMENT:** (Concern ID: 60692) Commenters expressed concern that the parking for the proposed visitor center under alternative 4 is too close to a portion of the Cedar Pass Lodge cabins, which would affect the visitor experience of those staying in the cabins.

Response: Adverse impacts on visitors staying in the cabins adjacent to the proposed visitor center will be avoided and mitigated by managing the operational hours of the visitor center and adding vegetative screening. Adverse impacts on the visitor experience will be avoided due to the differing peak times of use for these facilities. The proposed visitor center will be active during daytime hours, when those visitors staying in the cabins will likely be out exploring the park and using other park amenities. During dusk and overnight hours, when visitors will be occupying the cabins, the visitor center will be closed. Vegetative screening will be added between the affected cabins and the proposed visitor center to minimize the visual impacts of the proposed visitor center to visitors staying in the cabins.

10. **CONCERN STATEMENT:** (Concern ID: 60693) One commenter proposed modifying alternative 4 by moving the existing visitor center to the west and changing the function of the building to serve as the administrative building. Once the old visitor center is moved, a new visitor center could be built on the existing site so that the visitor center would still be the first building visitors see—remaining adjacent to the resource and retaining the connection to the “Saber Cat Site.”

Response: The suggested approach to meeting the administrative and visitor center space needs is not feasible. The Ben Reifel Visitor Center has some cast-in-place walls and existing structural concerns; moving the building to a new location would incur a substantial amount of additional risk and expense. New construction is a more sustainable and cost-effective option. In addition, the historical location of the Ben Reifel Visitor Center is an important aspect of the cultural landscape, and moving this structure would likely result in adverse impacts on the cultural landscape. Lastly, visitors to Cedar Pass are able to access the resource from multiple locations along Badlands Loop Road, and the changed visitor center location will not change the overall accessibility of the resource to visitors to Cedar Pass. Therefore, this alternative concept was not carried forward for analysis. This dismissal has been added to the document errata.

11. **CONCERN STATEMENT:** (Concern ID: 60694) Commenters expressed concern with the proposal to reorient the amphitheater, stating that moving the screen to the east would allow car headlights from the west parking lot to shine on the screen and that the screen would block the view of the Badlands. Another commenter stated that the amphitheater was recently redone and without a proven need for more seating, only minimal changes should be made.

Response: The proposed reorientation of the amphitheater is designed to reduce interference from car headlights while returning the amphitheater to its historical orientation. Because of the location of the amphitheater with respect to Highway 377, light from oncoming vehicle headlights will affect the visitor experience regardless of the amphitheater's orientation. To mitigate these impacts, screening adjacent to the rear of the amphitheater will be added to block light pollution during nighttime programming (see DCP/EA, page 33). Through the design process, the park will try to keep this screening as visually unobtrusive as practicable. In terms of the need for additional seating, park staff report that current seating is often inadequate for the number of attendees, causing visitors to use the surrounding buttes for informal seating, which results in the erosion and deterioration of this park resource.

12. **CONCERN STATEMENT:** (Concern ID: 60695) One commenter expressed concern about locating the proposed visitor center under alternative 4 in a previously undisturbed area. The commenter also questioned how the new construction would optimize visitor interactions with park resources any more than rehabilitation and expansion of the Ben Reifel Visitor Center would.

Response: While the proposed visitor center will be located within a previously undisturbed area, the 2006 general management plan for the north unit zones the Cedar Pass area for future development and identifies it as the principal area for visitor contact and park administration (DCP/EA, page 1). Appropriate measures will be implemented to avoid, minimize, and mitigate adverse impacts to paleontological and water resources (DCP/EA, pages 63 and 64).

One of the design themes of alternative 4 is to optimize visitor interactions with park resources. To accomplish this, alternative 4 will include an outdoor program area on the east side of the facility, adjacent to the visitor center's interior interpretive and information spaces. Alternative 4 will also enhance visitors' views of the Badlands Wall and other natural resources of the park through large, north-facing windows that will immerse visitors in the Badlands landscape. Alternative 4 also includes the possibility of elevating the interior floor of the visitor center above ground level to remove Badlands Loop Road and the associated traffic from views of the resource (DCP/EA, page 45). The rehabilitation or expansion of the Ben Reifel Visitor Center would not accomplish this design theme to the same degree because the Mission-66 visitor parking lot and Badlands Loop Road interfere with views towards the resource from both the visitor center and the outdoor program area.

13. **CONCERN STATEMENT:** (Concern ID: 60696) One commenter questioned if the designated parking area for trailers (near what is now the southernmost set of buildings) would be able to accommodate the necessary turning radius once new buildings are constructed.

Response: Under the preferred alternative, the turning radii of buses and recreational vehicles will be accommodated at all intersections and within the parking areas designated for these vehicles (see DCP/EA, pages 23, and 58-59). In locations where turning radii of certain vehicles are not accommodated, signage will warn drivers to avoid this area to protect the safety of park visitors and staff.

14. **CONCERN STATEMENT:** (Concern ID: 60697) One commenter agreed with the need for increased quality and quantity of housing for seasonal and permanent park employees. The commenter indicated that the proposed housing should not include housing for concessioner staff because these needs should be filled outside the park. The commenter feels providing concession housing inside the park gives the appearance that the NPS works for the concessioner.

Response: The partnership between the National Park Service and the concessioner allows the park to provide important services and amenities to park visitors. Because of the remoteness of the park and the limited availability of affordable housing within a reasonable commuting distance, the provision of housing within the park for both NPS and concessioner employees is an important component of both the park and the concessioner's ability to recruit and retain qualified staff. The concessioner's services at the park, which include operation of the Cedar Pass Lodge, cabins, and campground, typically operate on 10-year contracts. To require the concessioner to invest in housing construction outside the park when that concessioner may not hold the next contract is not financially feasible. In addition, providing staff housing onsite allows for a quicker response time to overnight maintenance needs and other emergencies, thereby protecting the health and safety of park visitors.

- 15. CONCERN STATEMENT:** (Concern ID: 60698) One commenter stated that the existing headquarters, wildlife, and maintenance buildings, including two of the modular buildings, are in good shape and are not in need of repair. The commenter also questioned the justification for additional office space when some space in the existing facilities is currently vacant.

Response: The commenter is mistaken on the condition of the modular buildings. These structures were intended to serve as temporary facilities only and have surpassed their intended design life. The structures are inefficient to heat and cool. The development concept plan is intended to provide a blueprint for development within the Cedar Pass area over the next 50 years. As such, the National Park Service has determined that it is appropriate to consider replacement of these facilities in the context of the plan.

- 16. CONCERN STATEMENT:** (Concern ID: 60700) Commenters suggested that the park include additional museum storage space in the facilities proposed in the DCP / EA, noting that current storage is inadequate and increased storage would be needed for fossils discovered during the construction proposed under the development concept plan.

Response: If fossil resources are discovered during the project, they will be properly stored, either in the existing museum storage facility or off-site. Thousands of Badlands museum specimens are already housed at the South Dakota School of Mines & Technology or other off-site institutions. The need for additional museum storage capacity in the long term is recognized but is beyond the scope of the development concept plan planning process.

- 17. CONCERN STATEMENT:** (Concern ID: 60701) One commenter suggested that the National Park Service consider building two-story facilities to allow for more space in the same proposed development footprint and to diminish visual impacts.

Response: The construction of two-story buildings was one of the strategies considered in the development concept plan for minimizing the development footprint of new and renovated facilities. However, limiting the height of structures to one story was determined to be an important requirement for preserving the characteristic one-story massing style and scale of the Cedar Pass area built environment, and protecting the views and vistas of park resources and views of the historic areas of Cedar Pass, in accordance with the treatment recommendations in the cultural landscape report. The topography of the Cedar Pass area and the location of structures within the landscape make taller structures incompatible with protection of the views to the facilities and views from within the facilities to the surrounding landscape.

- 18. CONCERN STATEMENT:** (Concern ID: 60702) Several commenters made suggestions that are outside the scope of the development concept plan. One commenter suggested future development

include more looped hiking trails. Another commenter outlined suggestions that the funding priorities for the park should be to (1) increase professional level resources and interpretive staff back to 2001 levels; (2) increase and improve NPS employee and volunteer housing; (3) build a paleontology lab with classrooms, office, and a library; (4) build a new lodge building; (5) build a new ranger station by the resource management building; (6) build a new headquarters building behind the existing visitor center to house natural resources, removing the modular buildings; and (7) build a functional ranger station in the fire cache or maintenance areas. Another commenter outlined a different set of priorities for the park, suggesting the park should be maintaining the endangered black-footed ferret population; documenting and preserving scientifically significant fossils; controlling nonnative weeds and protecting the native prairie; understanding and being capable stewards of bison, bighorn sheep, prairie dogs, and all the other species the park was established to protect; and dedicating staff to inform the public about all these important resources and what it takes to keep them thriving. The commenter further noted that the budget for these activities is insufficient, and that the construction and subsequent maintenance of facilities proposed in the DCP/EA would take financial resources from these priorities. Lastly, a commenter stated that park resources should be used for key land acquisitions, as proposed in the park's 2006 general management plan.

Response: The priorities attributed to various park construction, maintenance, and operational activities are beyond the scope of the development concept plan. However, all of the suggested priorities, including those related to resource preservation and environmental stewardship, are included in the preferred alternative. Additional trails for both pedestrian access and recreation within Cedar Pass are discussed on pages 53 and 64 of the DCP/EA. The suggestion to include more loop trails outside of the Cedar Pass area are outside the scope of this planning effort.

19. **CONCERN STATEMENT:** (Concern ID: 60704) One commenter noted that an additional 30 days was requested for review of the DCP/EA, and while a 3-day extension was granted, this did not provide enough time to review all of the material and provide well-researched comments.

Response: The National Park Service appreciates all comments on the DCP/EA. To facilitate the ability of the public and other stakeholders to comment on the document, the original comment period was 45-days, which is 15-days longer than the required 30-day comment period. After a request for an additional extension, the National Park Service provided an additional 3 days as noted by the commenter, which was in addition to the additional 15 days in the original comment period. The National Park Service considers this sufficient time to comment on the DCP/EA.

20. **CONCERN STATEMENT:** (Concern ID: 60707) One commenter questioned if a cultural survey has been completed for the Cedar Pass Development Area, and if so, when it was completed.

Response: Multiple cultural surveys have been completed for the Cedar Pass Development Area, including:

Cedar Pass Developed Area Cultural Landscape Report (2005)

Archeological Inventory of Developed Areas, Badlands National Park (2016)

Cedar Pass Developed Area Historic District: Historic Structures Report (2018)

There are several historic properties in the project area, and no recorded prehistoric sites. All of this information was considered during the development of the DCP/EA (see the "Cultural Resources" section of the "Affected Environment" chapter of the DCP/EA for additional information).

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21. **CONCERN STATEMENT:** (Concern ID: 60708) One commenter stated that it is difficult to determine which alternatives are necessary and/or feasible without the inclusion of cost estimates in the DCP/EA. Additionally, the commenter requested that the document include a target timeframe for facility construction, noting that the modular buildings, which are currently functional, may not be functional in 10 to 20 years.

Response: Cost estimates are not required in a NEPA document. The costs to implement the development concept plan will be refined over time as the project moves from concept to design. The errata notes that there is no timeline for implementation of the development concept plan at this point; the plan is intended to provide a blueprint for development over the next 50 years. The development concept plan will likely be implemented incrementally over time, as funding allows.

22. **CONCERN STATEMENT:** (Concern ID: 60709) Commenters requested that climate change be carried forward for as an impact topic for analysis in the DCP/EA, specifically noting that the information included in the *Climate Change Vulnerability Assessment and Climate Change Scenarios* and changes in weather patterns should be considered and incorporated.

Response: The impacts on climate change are discussed on page 10 of the DCP/EA, which states, "The Cedar Pass area development concept plan would not affect air quality or result in the increased discharge of greenhouse gases to the atmosphere that affect climate change." Impacts from climate change on Cedar Pass facilities are also considered, as the description of the alternatives make multiple mentions of climate-sensitive design, addressing flooding events, and other design elements that address climate change.

23. **CONCERN STATEMENT:** (Concern ID: 60710) One commenter stated that the DCP/EA should carry forward geology and soils as an impact topic for full analysis because of the potential for increased runoff due to impermeable surfaces eroding soils and the proposed development within previously undisturbed areas.

Response: The DCP/EA recognizes the occurrence of flood events in the area and the potential for increased runoff with an increase in impervious surfaces. Because of the importance of this topic, it is included as a standalone impact topic under "Stormwater and Floodplains." The errata notes that the geology and soils section has been modified to include the sentence, "Issues related to stormwater runoff as a result of the proposed alternatives is addressed under Stormwater and Floodplains."

24. **CONCERN STATEMENT:** (Concern ID: 60711) Commenters stated concerns that the DCP/EA does not adequately consider impacts on deferred maintenance. They requested that the document note which projects would reduce the park's overall deferred maintenance backlog and questioned the need for a large expansion of facilities when the National Park Service is currently facing a significant service-wide deferred maintenance backlog.

Response: The DCP/EA was developed in part, to address the park's concerns about deferred maintenance. The facilities that are proposed to be removed or rehabilitated are those for which there are deferred maintenance concerns. The projects proposed under alternative 4 will address the accumulated deferred maintenance for facilities at Cedar Pass. The new proposed facilities will be designed with future operating and maintenance needs in mind, in an effort to reduce future deferred maintenance. Rather than a large expansion, the plan proposes to improve the services already provided at the park.

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25. **CONCERN STATEMENT:** (Concern ID: 60712) One commenter stated that the DCP/EA refers to related studies (specifically the market analysis report, historic structures report, housing needs assessment, and the contents of the concessions contract) but notes that these studies are not included as an appendix to the document or otherwise made available to the public, making it difficult to judge whether the data or the other planning studies fully support the actions proposed in the DCP/EA.

Response: The historic structures report and housing needs assessment documents do not contain sensitive information and can be provided to the public. To facilitate the public's access to these documents, they have been added to the DCP/EA PEPC site (<https://parkplanning.nps.gov/badl>). However, both the concessions contract and market analysis report contain sensitive financial and contract information that is not appropriate to provide to the public.

The market analysis is a component of the concession contract prospectus development process. Information collected includes proprietary information from the existing concessioner. Market analysis data is used in development of the concessions prospectus. Information gathered during prospectus development is treated confidentially. Elements of the market analysis may be seen in the prospectus when it's released through the Federal Business Opportunities website.

In this particular instance, the market analysis report was used as a resource document for the development concept plan for the topics of visitor services; facilities; the size and configuration of lodging, retail, food and beverage; and operational administrative spaces.

The park's prospectus development process is ongoing and will continue through the next year to year and a half.

26. **CONCERN STATEMENT:** (Concern ID: 60713) One commenter questioned why the 2006 general management plan and cultural landscape reports were not included in the "Relationship to Other Planning Efforts." The commenter requested that these documents be included if they are still valid, and if they are no longer valid, the DCP/EA should state why. The commenter questioned why proposed actions in the DCP/EA are not consistent with those proposed in the 2006 general management plan, which called for renovating the visitor center and adding an extension to it to serve as new administration/headquarters space. The commenter also questioned why restrictions from the cultural landscape report are no longer in place.

Response: As noted on page 1 of the DCP/EA, the 2006 Badlands National Park, North Unit Final General Management Plan remains a critical piece of the park's planning portfolio and will continue to be updated and/or supplemented in a timely manner through the development of additional park planning documents, of which the DCP/EA is one. Following the approval of the DCP/EA, the park's planning portfolio will be updated to include management actions as described in the DCP/EA. The cultural landscape report is incorporated by reference throughout the DCP/EA, and all of the action alternatives evaluated in the DCP/EA, including the preferred alternative, generally adhere to the rehabilitation treatment recommendations from the cultural landscape report. Where these restrictions are not adhered to, an adverse impact has been assessed. Adverse effects resulting from the preferred alternative will be resolved in collaboration with the South Dakota State Historic Preservation Office through the section 106 process.

27. **CONCERN STATEMENT:** (Concern ID: 60714) Commenters questioned including increased visitation in the "Need for the Action" section. They stated that visitation trends have fluctuated over recent years, due in part to NPS promotions such as "Find Your Park" and the NPS centennial, and noted that visitation numbers otherwise have remained relatively flat over the long term.

Response: The DCP/EA misstated visitation trends at the park. The commenters are correct that visitation has fluctuated over the last few decades; it is only over the last few years that the visitation has increased year-over-year. The errata corrects the statement of annual visitation trends, referencing the official NPS Visitor Use statistics.

28. **CONCERN STATEMENT:** (Concern ID: 60716) One commenter stated the purpose and need for action should focus on NPS staff and visitor needs and not include the needs of the concessioner, who only operates in the park to serve visitor and NPS needs.

Response: The concessioner is responsible for fulfilling the requirements of a concession contract and providing the necessary and appropriate visitor services required and/or authorized by the National Park Service. The inability of the facilities at Cedar Pass to meet the needs of visitors and the park directly affects the concessioner's ability to provide contractually required visitor services. Therefore, it is appropriate to include the concessioner in the purpose and need statement.

ATTACHMENT C: ERRATA

On August 6, 2018, in a memo providing additional direction for implementing Secretary's Order 3355 regarding Environmental Assessments (EAs), the Deputy Secretary stipulated that Bureaus should strive to complete EAs in 75 pages or less, excluding appendices. This EA was developed prior to that mandate and exceeded 75 pages when it was released for a 48-day public review. To comply with the Deputy Secretary's mandate, the EA has been shortened, and a final EA will be published—no substantive changes were made in reducing the length of the document, and no further public review will be conducted.

In response to public comments, the following changes have been made to the final Cedar Pass Development Concept Plan / Environmental Assessment to correct minor statements of fact and update information. Additions to the text are identified by *red, italicized text* and deletions are marked by ~~strikeout~~ unless otherwise noted. These revisions do not change the outcome of the impact analysis, nor do they affect the final decision documented in the Finding of No Significant Impact.

Section and Page Number	Text Change
Introduction, page i	The park's 2006 general management plan for the north unit zones the Cedar Pass area for future development and identifies it as the principal area for visitor contact and park administration (NPS 2006a). <i>At the time of publication, the National Park Service has not identified a timeline for implementation of the development concept plan; the plan is intended to provide a blueprint for development over the next 50 years. The plan would likely be implemented incrementally over time, as funding allows.</i>
Impact Topics Dismissed from Further Analysis, Geology and Soils, page 9	Each action alternative would not require excavation or grading in a way that would disrupt any geological resources outside of the area zoned for development in the park's general management plan for the north unit. The majority of soils in this area are previously disturbed, and any additional ground disturbance would be minimal. <i>Issues related to stormwater runoff as a result of the proposed alternatives are addressed under "Stormwater and Floodplains."</i> Therefore, these topics were dismissed from further analysis.

Section and Page Number	Text Change
Impact Topics Dismissed from Further Analysis, Noise and Soundscapes, page 11	<i>Preservation of the night sky is a goal of the park and is a requirement for all facility design according to the NPS architectural design standards. Additionally, in accordance with NPS Management Policies 2006, the National Park Service strives to preserve dark night skies and will “minimize light that emanates from park facilities, and also seek the cooperation of park visitors, neighbors, and local government agencies to prevent or minimize the intrusion of artificial light into the night scene of the ecosystems of parks” (NPS 2006b). No construction activities would occur at night, and ambient light levels would not increase beyond current levels. Dark sky preservation would be addressed in detail if the proposed facilities move into the design phase. Existing landscape lighting and parking lighting would also be replaced according to the development concept plan and would be designed to meet dark sky requirements.</i> Therefore, this topic was dismissed from further analysis.
Elements Common to all Action Alternatives, Facility Elements, page 31	12 apartments units for park staff units in 3 historic buildings
Alternative 4: Redefine the Experience at Cedar Pass (NPS Preferred Alternative), page 45	With the exception of the visitor center and two new tent camping loops south of the existing camping area, all proposed development under alternative 4 would occur within previously und disturbed areas.
Alternative 4: Redefine the Experience at Cedar Pass (NPS Preferred Alternative), Cedar Pass Lodge, page 49	A new cabin court would be located in a portion of the area currently used for concessioner housing and would contain 14 units in 10 new guest cabins, which would be a mix of <i>single, double, and cottage-style</i> cabins as shown in table 9.
Alternative 4: Redefine the Experience at Cedar Pass (NPS Preferred Alternative), Cedar Pass Lodge, page 49	An alternative arrangement would remove this rectangular courtyard and move one duplex unit from the south side to the north side of the road. <i>Lastly, vegetative screening would be added between the proposed visitor center and the adjacent cabins to minimize the visual impacts of the proposed visitor center to visitors staying in the cabins.</i>

Section and Page Number	Text Change
<p>Alternatives Considered but Dismissed from Detailed Analysis, page 51</p>	<p>MOVING THE BEN REIFEL VISITOR CENTER TO ANOTHER LOCATION</p> <p><i>During the public comment period, the National Park Service received a suggestion to move the existing visitor center building to the west and change the function of the building to administrative, using the existing location of the Ben Reifel Visitor Center to construct a new visitor center facility. The National Park Service determined this approach is not feasible. The Ben Reifel Visitor Center has some cast-in-place walls and existing structural concerns; moving the building to a new location would incur a substantial amount of additional risk and expense. New construction is a more sustainable and cost-effective option. In addition, the historic location of the Ben Reifel Visitor Center is an important aspect of the cultural landscape and moving this structure would likely result in an adverse impact on the cultural landscape. Therefore, this alternative was not carried forward for further analysis.</i></p>
<p>Mitigation Measures for the Proposed Action, Stormwater and Floodplains, page 62</p>	<p>Create a stormwater management plan during the design process to include more detailed hydrologic studies, <i>flood control plans</i>, and drainage plans for new construction, as well as additional avoidance, minimization, and mitigation measures based on future engineering and design work. <i>The stormwater management plan would include a detailed floodplain analysis that would provide design criteria for preliminary and final construction plans and diagrams.</i></p>
<p>Mitigation Measures for the Proposed Action, Paleontological Resources, page 63</p>	<p><i>A qualified paleontologist would be on-site during any ground-disturbing construction activities in the Cedar Pass area, as part of Implement a construction monitoring program area for all construction activities in the Cedar Pass area (Benton et al. 2014). If resources were discovered during construction, work in that location would be stopped until the resources are properly recorded and evaluated. Appropriate measures would be taken to avoid further resource impacts or to mitigate their loss or disturbance.</i></p>
<p>Visitor Experience and Safety, Visitation Trends, page 72</p>	<p>Visitation to the park has steadily increased at an average of 1.6% annually between 2007 and 2016 (Dornbush Associates 2017) fluctuated over the last two decades but has increased steadily since 2014 (NPS 2017c).</p>

Section and Page Number	Text Change
Visitor Experience and Safety, Alternative 4: Redefine the Experience at Cedar Pass, Analysis, page 111	<p>The demolition of the existing facility and construction of a new Cedar Pass Lodge and separate check-in building, addition of 15 lodging units, and other improvements within this development cluster would result in direct, long-term, beneficial impacts on visitor experience as described under alternative 2, with the following differences.</p> <ul style="list-style-type: none"> • The location of the proposed visitor center has the potential to adversely affect the experience of visitors staying in the adjacent cabins. Adverse impacts on visitor experience would be avoided because the facilities have different peak times for visitor use. The proposed visitor center would be active during daytime hours, when those visitors staying in the cabins would likely be out exploring the park and using other park amenities. During dusk and overnight hours, when visitors would be occupying the cabins, the visitor center would be closed. Vegetative screening would be added between the affected cabins and the proposed visitor center to minimize the visual impacts of the proposed visitor center on visitors staying in the cabins.
Cultural Landscapes, Alternative 4: Redefine the Experience at Cedar Pass, Cumulative Impacts, page 118	<p>Beneficial impacts on the cultural landscape would be the same as those described under alternative 2. However, alternative 4 would also result in direct, long-term, adverse impacts from the demolition of the historic Cedar Pass Lodge. Alternative 24 would contribute appreciable direct, long-term, beneficial impacts on the overall cumulative effects to the cultural landscape in the Cedar Pass area.</p>
Public Involvement, page 131	<p>The development concept plan / environmental assessment will be was on formal public and agency review for 3048 3048 days.</p>