



**National Park Service
U.S. Department of the Interior**

**Yellowstone National Park
Idaho, Montana, Wyoming**

**FINDING OF NO SIGNIFICANT IMPACT
Concessionaire Housing and RV Sites**

Recommended:


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7/8/19
Date

Approved:


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7/18/19
Date

INTRODUCTION

In compliance with the National Environmental Policy Act (NEPA), the National Park Service (NPS) prepared an Environmental Assessment (EA) to examine alternative actions and environmental impacts associated with a proposal from park concessionaire partners to construct modular housing units, recreational vehicle (RV) sites, and bath houses at Canyon Village and West Entrance Warehouse in Yellowstone National Park. The project is needed because concessionaire staffing levels have increased to accommodate increasing visitor use and visitor services, yet housing supply has not expanded commensurate with staffing levels. The project will be funded by the concessionaire partners, not by the NPS.

The statements and conclusions reached in this Finding of No Significant Impact (FONSI) are based on documentation and analysis provided in the EA and associated decision file. To the extent necessary, relevant sections of the EA are incorporated by reference below.

SELECTED ALTERNATIVE AND RATIONALE FOR THE DECISION

Based on the analysis presented in the EA, the NPS selected alternative B – New Concessionaire Housing at Canyon Village Campground Loop G and RV Sites at West Entrance Warehouse (NPS preferred alternative). The selected alternative will construct six modular housing units, fourteen RV sites, and renovate two comfort stations in the former Loop G of the Canyon Village Campground, which is operated by Xanterra Parks and Resorts. Loop G is north of the main campground and has not been used for visitor camping since 1972 due to lack of occupancy and insufficient water pressure. Since that time, the loop has been used as a maintenance storage area and as an overflow RV area for contractors working around Canyon Village. The total area of new disturbance will be approximately 2.6 acres (2.3 acres permanent and 0.3 acres temporary). Permanent disturbance will occur from the construction of modular housing units, RV sites, parking spaces, and roadway. Temporary disturbance will occur from trenching for utilities.

At the West Entrance Warehouse, which is operated by Delaware North Corporation, 25 RV sites and one bathhouse will be constructed on the perimeter of the warehouse parking area. The final design includes a small modification to the original design described in the EA. In the EA, the new RV sites were described as being located completely outside the existing pavement, requiring more disturbances to vegetation and habitat. The sites will instead be placed halfway on the existing parking area/pavement to reduce impacts to vegetation and habitat, while still allowing for semi-truck access to the warehouse. The total area of new disturbance will be approximately 2.0 acres (1.5 acres permanent and 0.5 acres temporary). Permanent disturbance will occur from the construction of RV sites and a bathhouse. Temporary disturbance will occur from trenching for utilities.

Rationale

Alternative B was selected because it best meets the project purpose to:

- Develop seasonal housing for concessions employees in areas that have pre-existing infrastructure.
- Minimize adverse impacts on park resources.

MITIGATION MEASURES

Refer to Appendix A for a complete list of all mitigation measures that will be implemented for the selected alternative.

FINDING OF NO SIGNIFICANT IMPACT

CEQ regulations at 40 CFR Section 1508.27 identify ten criteria for determining whether the selected alternative will have a significant effect on the human environment. The NPS reviewed each of these criteria given the environmental impacts described in the EA and determined there will be no significant direct, indirect, or cumulative impacts under any of the criteria.

The following impact topics were dismissed in the EA because there is no potential for significant impacts: geological resources, wildlife, threatened and endangered species, air quality and greenhouse gas emissions, soundscapes, cultural resources, ethnographic resources, historic resources, cultural landscapes, lightscapes, and visitor use and experience (at the West Entrance Warehouse Site).

The park consulted with the Montana and Wyoming State Historic Preservation Offices and received concurrence that neither project site would adversely affect historic properties or districts within the park.

As described in the EA, the selected alternative has the potential for adverse impacts on vegetation and soils, the grizzly bear, and visitor use and experience (only at Canyon Village Campground Loop G); however no potential for significant adverse impacts was identified.

Implementing the selected alternative will result in small adverse impacts to vegetation and soils. At Canyon Village Loop G, 2.6 acres of impact will occur (2.3 acres permanent and .3 acres temporary). Included in the permanent impacts is removal of 1.3 acres of mature lodgepole pine trees. At the West Entrance Warehouse Site, 2.0 acres of impacts will occur (1.5 permanent and 0.5 acres temporary). Adverse impacts to vegetation and soil at both locations will occur from grading, trenching, building, pouring gravel and pavement, and utility installation. However, the soil types and vegetation found at both project sites are common in the surrounding areas, and throughout the park.

The grizzly bear (*Ursus arctos horribilis*) is a listed species under the Endangered Species Act, and its known habitat includes areas in proximity to both the Canyon Campground and West Entrance. In consultation with the U.S Fish and Wildlife Service, it was determined that this project “may affect, not likely to adversely affect” the Yellowstone grizzly bear population. This project is unlikely to adversely affect grizzly bears because 1) mitigation measures will be implemented to inform project workers and future residents of the two sites about proper food storage, bear safety, and what to do during bear encounters; and 2) the project areas are within developed zones (a campground and work area) with human activity and little overall value as grizzly habitat, and thus, the areas are not commonly used by grizzly bears.

Construction activity (which will likely take place July through September of one year) will result in small adverse impacts to visitor use and experience at Canyon Campground Loop G. Construction noise will be intermittent during that time, and will likely be countered by natural sounds, such as wind, and the sounds of other campers. Once the project is completed, visitors using the ten campsites within 100 yards of Loop G may see some of the modular units and their lighting, and hear activity from residents. However, these adverse impacts will be small, because exterior colors and non-reflective materials and textures will be used to blend units in with the surrounding landscape; vegetation and natural topography will be preserved as much as possible to screen new infrastructure from the existing visitor camper loops; and Loop G residents will be required to abide by the quiet hours regulation enforced throughout the rest of the campground.

CONCLUSION

As described above, the selected alternative does not constitute an action meeting the criteria that normally requires preparation of an Environmental Impact Statement (EIS). The selected alternative will not have a significant effect on the human environment in accordance with Section 102(2)(c) of NEPA.

Based on the foregoing, it has been determined that an EIS is not required for this project and thus, will not be prepared.

Appendix A: Mitigation Measures

The following mitigation measures have been identified to minimize the degree, extent, and/or severity of adverse impacts and would be implemented during the project.

General Construction Best Management Practices

- Ground disturbance, staging, and stockpiling areas will be located in parking areas or in previously disturbed sites within the project footprint, away from core visitor use and residential areas, to the greatest extent possible. All staging and stockpiling areas will be returned to pre-construction conditions following construction.
- Construction zones will be identified and fenced with construction tape, snow fencing, or some similar material prior to any construction activity. Fencing will define the construction zone and confine activity to the minimum area required for construction. All protection measures will be clearly stated in the construction specifications and workers will be instructed to avoid conducting activities beyond the construction zone as defined by the construction zone fencing.
- The NPS project manager will be responsible for ensuring the project remains within the construction limits.
- Fugitive dust generated by construction will be controlled by spraying water on the construction site if necessary. Any water used for dust control will be taken from hydrants in park administrative areas or a local source approved by the park.
- To minimize possible petrochemical leaks from construction equipment, the contractor will regularly monitor and check construction equipment to identify and repair any leaks.
- Fuel will be stored in fuel trucks or aboveground storage tanks, and all fuel storage will be in staging areas.
- Tools, equipment, barricades, signs, demolition debris, and rubbish will be removed from the project work limits upon project completion.

Soils

- Topsoil conservation measures will be employed in accordance with YNP Vegetation Management for Construction Disturbance Guidelines (YNP 1997). Topsoil will be stripped and replaced wherever possible to enhance revegetation following the construction phase.
- Disturbed soils are more susceptible to erosion and until revegetation takes place, standard erosion control measures such as silt fences and/or sandbags shall be used to minimize any potential soil erosion.

Vegetation

- The concessionaire will be required to provide annual funding for NPS native plant revegetation and non-native plant management in accordance with the 2013 Invasive Vegetation Management Plan.
- Disturbance to existing vegetation at the sites will be avoided to the greatest extent possible. During construction, a temporary construction limit fence will be placed at the project footprint to protect native vegetation.

- Vehicles, equipment, and staging for materials will occur within the project footprint.
- Equipment used will be cleaned to reduce the spread of non-native plant species.
- All equipment and materials will be staged on hardened surfaces, such as roadways and parking areas, in order to avoid damaging vegetation.
- Project areas and vegetation removal will be integrated into existing and future fuels treatment projects to improve defensible space adjacent to structures in order to protect human life, property and resources from wildfire.

Wildlife including Threatened and Endangered Species

- To avoid impacts to migratory birds during nesting season, all tree, shrub, and grass removal activities must not occur between March 1 to August 15 for raptors, and May 1 to August 1 for songbirds. If tree, shrub, and grass removal will occur within the specified dates, the Bird Program Manager will be contacted to schedule a survey of the project site prior to trees being removed.
- All outdoor food storage will adhere to park policies already in place to ensure no unattended food sources are available to wildlife.
- All contractors and employees will be given an orientation about working in grizzly bear country and briefed on proper food storage and safety measures. Orientation will include information about park regulations regarding food storage, disposal of garbage and other bear attractants, safety measures, and approaching or harassing wildlife.
- Contract provisions will require the cessation of construction activities if a species were discovered in the project areas, until park staff re-evaluates. This will allow modification of the contract for any protection measures determined necessary to protect the discovery.
- The Concessionaire will purchase and install bear proof lockers for BBQ grill storage at each modular and RV site at the West and Canyon project locations.

Soundscapes and Air Quality

- To reduce noise and emissions, construction equipment will not be permitted to idle for more than 10 minutes while not in use according to the Superintendent's Compendium, based on CFR 36 § - 5.13 Nuisances.
- Appropriate dust mitigation suppression controls, such as spraying water at the construction site and covering loaded trucks, will be implemented if needed.

Cultural Resources

- If previously unknown archeological or paleontological resources are discovered during construction in the parking areas and campground loops, all work in the immediate vicinity (200 feet) of the discovery will be halted until the resources are assessed by an archaeologist meeting the NPS Qualification Standards and the Secretary of the Interior's Professional Qualification Standards. If finds are determined to be potentially eligible for the National Register of Historic Places, an appropriate mitigation strategy will be developed in accordance with pertinent laws, regulations, and policy.

- In the unlikely event human remains are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act (1990) and NPS Director's Order 28 will be followed.
- The NPS will ensure that all contractors and subcontractors will be informed of the penalties for illegally collecting artifacts or intentionally damaging archeological sites or historic properties. Contractors and subcontractors will also be instructed on procedures to follow in case previously unknown archeological resources are uncovered during construction.

Geological Resources

- If any of the following conditions are encountered, work will stop and the park geologist will be contacted immediately: a pre-existing hole in the ground the size of a basketball or larger; standing or flowing water, either hot or cold; or a rotten egg smell.

Visual Quality

- Existing vegetation and natural topography will be preserved as much as possible to screen new infrastructure.

Visitor Use and Experience

- Campground guests will be informed of construction. Access to Loop G will be closed to ensure visitor safety throughout the construction period.
- Construction activities will only be permitted during normal park operating hours (8 a.m. - 6 p.m.).
- Transportation of equipment, vehicles, materials, and modular housing units will be conducted during times of low visitor traffic, such as before 7 a.m., in order to reduce the impacts to visitors along park road corridors.

NON-IMPAIRMENT DETERMINATION

Concessionaire Housing and RV Sites

By enacting the NPS Organic Act of 1916 (Organic Act), Congress directed the U.S. Department of the Interior and the National Park Service (NPS) to manage units "to conserve the scenery, natural and historic objects, and wild life in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wild life in such manner and by such means as will leave them unimpaired for the enjoyment of future generations" (54 U.S.C. 100101). NPS Management Policies 2006, Section 1.4.4, explains the prohibition on impairment of park resources and values:

"While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them."

An action constitutes impairment when its impacts "harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values" (NPS 2006, Section 1.4.5). To determine impairment, the NPS 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. An impact on any park resource or value may constitute impairment, but an impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;
- key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or
- identified in the park's general management plan or other relevant NPS planning documents as being of significance (NPS 2006, Section 1.4.5).

Fundamental resources and values for Yellowstone National Park are identified in the enabling legislation for the park, the Foundation for Planning and Management Statement, and the Long Range Interpretive Plan. Based on a review of these documents, the fundamental resources and values for Yellowstone National Park come from the park's geologic wonders, the abundant and diverse wildlife, the 11,000-year-old continuum of human history, and providing for the benefit, enjoyment, education, and inspiration of this and future generations. Resources that were carried forward for detailed analysis in the EA and are considered necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, are key to the natural or cultural integrity of the park, and/or are identified as a goal in relevant NPS planning documents include the grizzly bear, and vegetation and soils. Accordingly, a non-impairment determination is made for each of these resources. Non-impairment determinations are not necessary for visitor use and experience because impairment findings relate back to park resources and values, and this impact topic is not generally considered a park resource or value according to the Organic Act.

This non-impairment determination has been prepared for the selected alternative, as described in the Finding of No Significant Impact for the Concessionaire Housing and RV Sites EA.

Grizzly bear

The project areas are not located within known areas of high use for grizzly bear. The 2016 Conservation Strategy for Grizzly Bear in the Greater Yellowstone Ecosystem was developed to provide guiding management principles and monitoring strategies for the Yellowstone grizzly bear population and its habitat upon recovery and delisting as a Threatened Species under the Endangered Species Act. The Strategy allows for increases in administrative (meaning NPS and concessions) overnight capacity to manage increasing park visitation within existing developments, which includes a buffer of approximately 100 yards. The project areas at Canyon Campground Loop G and West Entrance Warehouse are within the guidelines established in the Strategy, and are thus not considered 'secure habitat.'

In addition, there are no bear management areas in the vicinity of Canyon Campground Loop G or the West Entrance Warehouse. Each of the projects would be constructed largely within previously disturbed areas with some existing levels of human activity during the summer months. Hence, both areas have little overall value as grizzly habitat. Implementation of the project therefore has little potential to cause bear displacement or loss of habitat. A small influx of workers during the construction phase, and additional residents living in the project areas once construction is complete, may lead to increased potential for grizzly-human conflicts, but the likelihood of a conflict is very small due to implementation of the mitigation measures described in the EA.

Vegetation and Soils

Native vegetation in both project locations is dominated by lodgepole pine forests, which is common throughout the park. A sparse understory of species includes yarrow, knotweed, arnica, and elk sedge. Special status plant species and wetlands were not observed within the project sites.

Soils in the Canyon Area consist of sand, silt, or clay underlain by poorly graded and clayey sand. Topsoil is generally shallow. Soils are derived primarily from rhyolitic bedrock and thus, nutrient-poor. They are also extremely acidic due to geothermal alteration of parent material. Soils at the West Entrance were formed on glaciofluvial outwash plains and consist of well-drained gravelly coarse sandy loam derived from rhyolite. There are also small areas of recent stream and fan alluvium.

Construction actions for the two site locations include grading, trenching, building, pouring gravel and pavement, and utility installation. At Canyon, these actions will adversely affect approximately 2.6 total acres of vegetation and soils. Specifically, the project will permanently affect 2.3 acres; this includes the removal of 1.3 acres of lodgepole pine forest. At the West Entrance Warehouse, the same actions will adversely affect approximately 2.0 total acres of soils and vegetation. Specifically, the project will permanently affect 1.5 acres; this includes the removal of up to 0.5 acres of lodgepole pines.

Construction of modular housing units, RV sites, parking spaces, and roadway will result in conversion of natural surface to man-made surfaces in the area of permanent effects. Removal of mature lodgepole pines could also have an adverse impact on the remaining adjacent trees in the project area due to increased risk of downing by wind. Temporary impacts, such as soil disturbance from trenching, will affect 0.8 acres combined in the project areas. These temporary impacts would last only for one construction season.

Implementation of the selected alternative will result in a small, permanent loss of natural ground and vegetative cover, totaling 3.8 acres, for both sites. The lodgepole forests and nutrient-poor, acidic soils found in the project areas are common throughout the park. Impacts are thus limited geographically, and very small on a 2.2 million acre parkwide scale.

Conclusion

In conclusion, based on the preceding analysis and in consideration of the park's purpose and significance, it is the Superintendent's professional judgment that these resources will continue to be

present for enjoyment by current and future generations. Therefore, implementation of the selected alternative will not constitute an impairment of the resources or values of Yellowstone National Park.

TEXT CHANGE ERRATA

The following erratum together with the FONSI and the EA describe the final decision of the National Park Service for the Concessionaire Housing Development at Canyon Campground Loop G and the West Entrance Warehouse.

ERRATA

This erratum is to be attached to the Concessionaire Housing and RV Sites EA dated May 2019 and is intended to correct or clarify statements in the EA other than typographical and minor editorial errors and to address substantive comments on these documents received during the public comment period.

Alternatives Considered and Dismissed (Pg. 16): Add alternative to consider requiring concessionaires to purchase land outside the park to develop housing.

In many cases, it is impractical to require concessionaire employees to live outside the park and commute into the interior daily. The park is 2.2 million acres, and travel to some of the park's developed areas from the nearest gateway community can take an hour or more, one-way. Due to the proximity of the West Entrance to the town of West Yellowstone, the park considered the possibility of requiring the concessionaire to purchase land within the town to develop for their housing needs. However, the amount of housing in West Yellowstone is constrained by a limited amount of developable land, and thus, housing and rental prices are very high. For the above reasons, this alternative was dismissed from further analysis because it is economical, geographical, and technically infeasible.

RESPONSE TO PUBLIC COMMENTS ERRATA

This EA was released in digital format for public review from May 15, 2019 to June 14, 2019. A press release was distributed to approximately 200 media outlets, numerous local chambers of commerce, local visitor centers, public officials, social media, the park's website, regulatory agencies, and affiliated Native American tribes.

Copies of the document were posted on the NPS PEPC website at: <http://parkplanning.nps.gov/concessionshousing>. The EA team received a total of 52 individual pieces of correspondence and more than 70 comments. Substantive comments were condensed into nine concern statements, and a response to each statement is provided below.

Project Funding

Concern Statement – A recommendation that concessionaire projects should be funded with company funds and not with funds from the National Park Service.

NPS Response – Structures and facilities within the park operated by the concessionaire are owned by the NPS, including campgrounds, general stores, lodges, historic structures, and employee housing. Improvements to these facilities can be financed either by the NPS or by the concessionaire. Larger concessionaires generally fund facility improvements that benefit their contracts. The housing projects described in this FONSI will be financed by the concessionaires.

Construction outside of Park

Concern Statement – Require concessionaires to purchase property outside the park for future housing needs.

NPS Response – In many cases, it is impractical to require concessionaire employees to live outside the park and commute into the interior daily. The park is 2.2 million acres, and travel to some of the park's developed areas from the nearest gateway community can take an hour or more, one-way. Due to the proximity of the West Entrance to the town of West Yellowstone, the park considered the possibility of requiring the concessionaire to purchase land within the town to develop for their housing needs. However, the amount of housing in West Yellowstone is constrained by a limited amount of developable land, and thus, housing and rental prices are very high. For the above reasons, this alternative was dismissed from further analysis because it is economical, geographical, and technically infeasible. A dismissal of this alternative has been added to the EA via a text change errata.

Cumulative Impacts

Concern Statement – A recommendation to consider the cumulative impacts of continued park development on the natural environment.

NPS Response – The park considers the cumulative impacts of a proposed action when added to other past, present, and reasonably foreseeable future actions in the project area. This analysis is documented in the cumulative impacts section of the EA. To minimize the impacts of this project on park resources, the park required the concessionaires to construct within areas that were previously disturbed or are currently developed. Because of this, the park limited the geographic scope of the analysis because the project locations are confined to existing developed areas and additional impacts in those areas will not have a cumulative impact on resources throughout the park as a whole.

NPS Housing

Concern Statement – A recommendation to prioritize NPS employee housing over housing developments for the concessionaires.

NPS Response – The Superintendent has identified NPS employee housing as a strategic priority for park management. As previously stated, the projects in the EA are funded by the concessionaires as a way to address their housing needs, and do not impact or influence the priorities of the NPS or the way the park can allocate funding towards our own housing needs. The park is currently working on a comprehensive housing study that will identify long-term housing needs for park employees in various parts of the park. The park has also acquired significant funding to replace dilapidated NPS housing units over the next few years, with the first replacement projects likely beginning in 2020.

Overcrowding

Concern Statement – A recommendation that the impacts of future overcrowding should be analyzed in the cumulative analysis of the project.

NPS Response – The topic of overcrowding is outside the scope of this analysis. Additionally, overcrowding is not an action that is attributable to a specific individual or entity. Therefore, consistent with Section 4.5C of the 2015 NPS NEPA Handbook, it is not a cumulative action and is not included in the cumulative impacts analysis. That said, visitation to Yellowstone has increased by approximately 40% since the early 2000s. In response, the park has taken a number of actions to better distribute use, reduce congestion, limit adverse resource impacts and improve facilities. Example actions include road intersection improvements to reduce traffic queueing, parking and pedestrian circulation changes at thermal attractions, and improved messaging to visitors via social media and the internet. The park will continue to monitor automobile traffic, visitor levels, trail and boardwalk use, resource impacts, and non-compliant visitor behavior to ensure a high-quality visitor experience and to prevent degradation of park resources.

Water/Sewer Capacity

Concern Statement – A recommendation that the park work with local officials in West Yellowstone before construction of any new housing due to water and sewer capacity issues.

NPS Response – The park will work with West Yellowstone to secure necessary permits prior to any new water or sewer utility use for the RV sites. The park will not authorize construction or occupancy of the housing at West until the water and sewer issues are resolved and the proper permits are secured.

Housing Occupancy

Concern Statement – A recommendation that the park should not allow concessionaire employees working for businesses outside of the park to occupy park employee housing.

NPS Response – Park facilities assigned under the terms of a concessions contract must be used exclusively for the purposes of fulfilling the terms of that contract. Concessionaires that have businesses outside of the park are not permitted to use in-park facilities to support those businesses. This policy applies equally to the current proposal, and any employee housing inside the park will only be available for those who are employed under one of the concessionaire contracts with the NPS.

Wildlife Habitat

Concern Statement – A recommendation that the park not develop within grizzly bear habitat until the species is delisted.

NPS Response - Both of the projects will be constructed largely within previously disturbed areas with existing levels of human activity during the summer months. There are no bear management areas in the vicinity of Canyon Campground Loop G or the West Entrance Warehouse, with each having negligible value as secured grizzly habitat.

Existing RV Parks

Concern Statement – Use existing RV Parks in West Yellowstone owned by the concessionaire to house employees.

NPS Response – As stated in the EA, Delaware North owns multiple properties in West Yellowstone that are not associated with the park concessions contract, including an RV Park that is currently used to house employees working for the park operation, but also for other businesses in West not under the park contract. However, the use of those properties is at the discretion of Delaware North.

Miscellaneous

Concern Statement – Figures in the EA do not accurately depict the amount of disturbance in the project descriptions.

NPS Response – The overall disturbance footprints are accurately depicted in the EA. In one instance (Figure 5, Page 9) the park included a digital rendering of the modular units at Loop G to show the general design scheme and appearance. This figure was not intended to show the exact placement of the structures or the precise locations of the foundations or footings that will be used to stabilize the structures.

Concern Statement – The design of the walkways and the modular units do not adequately mitigate impacts to resources.

NPS Response – The projects are designed to include walking paths that will greatly reduce the occurrence of social trails within the project areas. Additionally, if the design of the modular units creates an issue with wildlife encroaching beneath the structures, the park will require the concessionaire to mitigate the issue in ways such as installing fencing that will prohibit wildlife from entering beneath the structures.