

**CC-GRTE001 Concessions Services Prospectus  
Development  
Grand Teton National Park**

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**Environmental Assessment**

**May 18, 2020**

Estimated Lead Agency Total Costs Associated with Developing and Producing this EA \$102,000
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## INTRODUCTION

The National Park Service (NPS) is proposing several projects to potentially be included in the next prospectus to provide visitor services in Grand Teton National Park (the park) for concessions contract GRTE001 (CC-GRTE001), which is currently held by Grand Teton Lodge Company. A prospectus is a public solicitation for offers to conduct business with the NPS through a concessions contract. Under the existing contract, Grand Teton Lodge Company provides a wide range of visitor services such as lodging, food and beverage services, retail, marina operations, campgrounds, guided horseback rides, guided fishing trips, and guided float trips at several locations in the park, as shown in Table 1 and Figure 1. The operating season is generally May 15 through October 15.

**Table 1. Visitor services provided under concessions contract GRTE001.**

Services	Locations
Lodging/Overnight Accommodations	Jackson Lake Lodge, Jenny Lake Lodge, Colter Bay Village
Food and Beverage	Jackson Lake Lodge, Jenny Lake Lodge, Colter Bay Village
Retail	Jackson Lake Lodge, Jenny Lake Lodge, South Jenny Lake, Colter Bay Village
Service Stations	Jackson Lake Lodge
Fuel	Colter Bay Village, Jackson Lake Lodge
Campgrounds	Gros Ventre, Jenny Lake, Colter Bay Village
RV Campground	Colter Bay Village
Transportation	Based out of Jackson Lake Lodge, throughout park
Showers	Colter Bay Village, Jenny Lake Campground
Laundry	Colter Bay Village
Medical Clinic	Jackson Lake Lodge area
Float and Fishing Trips	Snake River (float/fish), Jackson Lake (fishing)
Marina	Colter Bay Village
Livery	Jackson Lake Lodge, Jenny Lake Lodge, and Colter Bay Village
Vending and Other Services	ATM, pay telephones, and limited vending throughout park

The concessions contract will expire on December 31, 2021. The NPS has identified several potential changes to the contract for consideration, including adding employee housing at Jenny Lake Lodge, Jackson Lake Lodge, and Colter Bay Village; adding fire protection enhancements at several locations in Colter Bay, Jackson Lake Lodge, and Jenny Lake Lodge; adding accessibility improvements at Colter Bay Marina and Elk Island; reconfiguring food and beverage service at Jackson Lake Lodge; improving amenities at campgrounds; and relocating a concessioner-operated warehouse from one in-park location to another.

## Purpose and Need

The purpose of the project is to provide necessary and appropriate visitor services consistent with the National Park Concession Management Improvement Act of 1998 (Public Law 105-391), address compliance with current codes and standards, increase operational efficiency, address employee housing shortfalls, and provide increased amenities in campgrounds, while meeting goals for preserving cultural and natural resources.

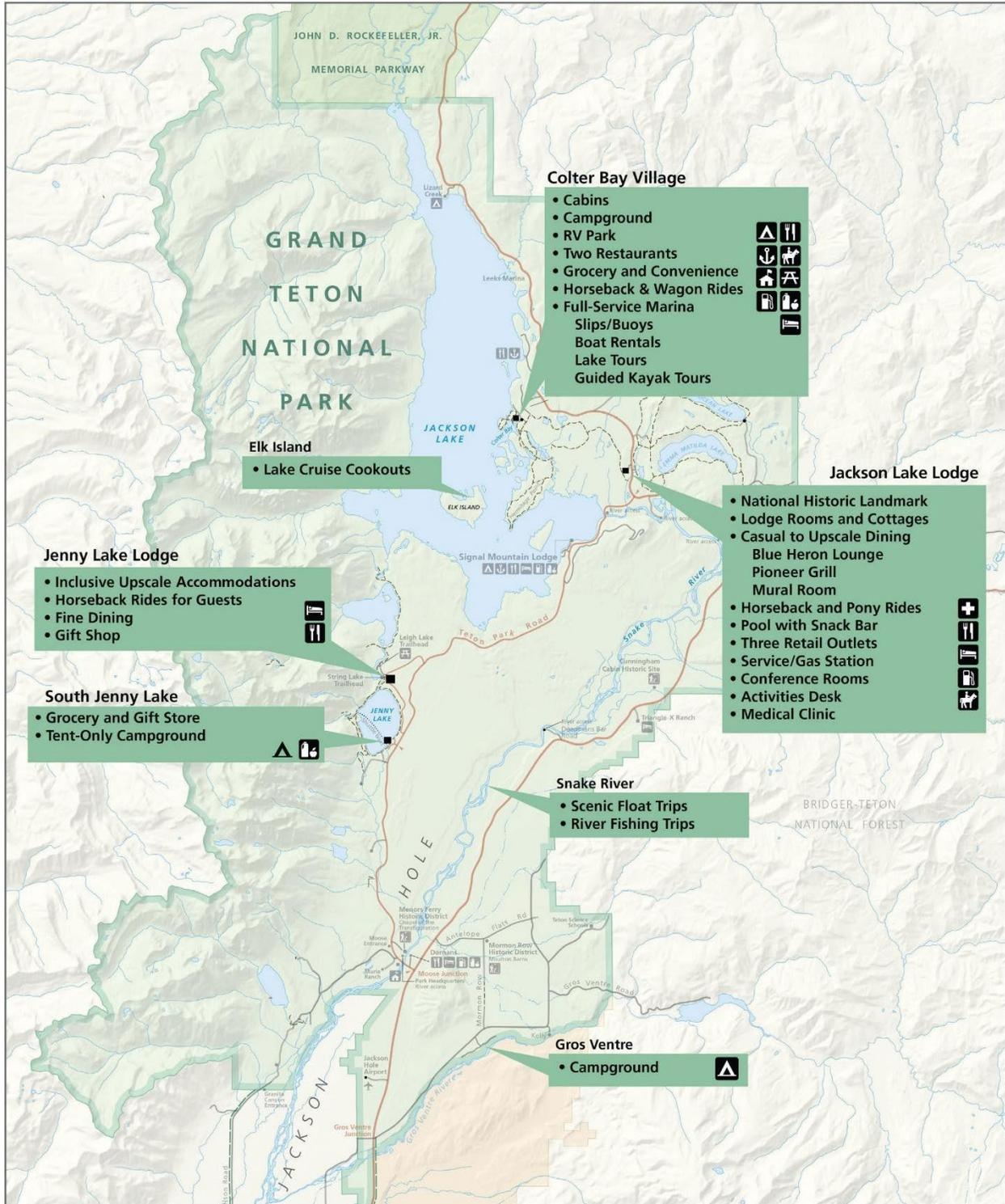


Figure 1. Current concessions operations under concessions contract GRTE001, Grand Teton National Park.

The proposed project is under consideration because the National Park Service (NPS) will issue a prospectus for the provision of visitor services in Grand Teton National Park for concessions contract GRTE001, and a need has been identified for changes to services, operations, and facilities associated with the concessions contract. Though no material expansion of commercial services has occurred, or increases in capacity for overnight accommodations made, increases in day use visitation continue to increase the need for concessioner services and employee support. The current concessioner employee housing consists of about 930 beds and is not adequate to support the current number of employees. A number of fire protection deficiencies at Jackson Lake Lodge and other concession-assigned facilities within the concession land assignment are identified in the 2019 report, *Fire Protection Analysis of Identified Buildings in Grand Teton National Park* (Jensen Hughes 2019). These deficiencies need to be corrected to protect the public and employees, protect a National Historic Landmark and other National Register of Historic Places (National Register) listed properties, and achieve compliance with current codes and standards. Additional improvements such as food and beverage service reconfiguration at Jackson Lake Lodge are needed to provide more efficient kitchen operations. Additional amenities at campgrounds are needed to reflect changing visitor demands and provide a wider variety of experiences (NPS Management Policies 2006, §9.3.2.1 Campgrounds). Relocation of a warehouse from one location in Colter Bay to another location in Colter Bay is needed to consolidate concession operations and separate it from NPS operations. Accessibility improvements are needed to address findings of the *2019 Accessibility Self Evaluation and Transition Plan* (NPS 2019a) and federal Architectural Barriers Act Accessibility Standards (ABAAS).

## ALTERNATIVES

### **Alternative A – Issue Prospectus and New Concession Contract without Improvements to Fire Protection, Employee Housing, Visitor Amenities, and Accessibility (No Action)**

The NPS would issue the prospectus and new concessions contract GRTE001 without changes to fire protection, employee housing, visitor amenities, and accessibility as described for Alternative B.

#### **Fire Protection**

Although fire protection measures currently exist, they do not comply with modern fire safety codes in various concessioner-assigned buildings at the park. The NPS would not implement the recommendations to correct the deficiencies identified in the report *Fire Protection Analysis of Identified Buildings in Grand Teton National Park* (Jensen Hughes 2019). Jackson Lake Lodge would continue to have the most deficiencies. The Jackson Lake Lodge employee recreation hall would continue to require additional fire protection measures. The sprinkler system in Jackson Lake Lodge would continue to provide partial coverage of the structure, and the sprinkler system would remain out of compliance with modern fire safety codes. The escape ladder on the south end of the 3rd floor that does not meet code would remain. In Jackson Lake Lodge, some areas would still not be up to standards, such as fire separation for several dumbwaiters in the 2<sup>nd</sup> floor main kitchen, main level hallway, and main level dishwashing room, and an exhaust duct in the Wyoming Room. Additional upgrades to Jackson Lake Lodge fire doors, the fire alarm system, and electrical system would not take place.

Jenny Lake Lodge, Colter Bay employee housing, grocery store, and laundry facilities would continue to have fire protection deficiencies, such as sprinkler system shortfalls and exposed wiring identified in the Jensen Hughes (2019) report.

#### **Jackson Lake Lodge and Jenny Lake Lodge Employee Housing**

Jackson Lake Lodge and Jenny Lake employee housing would continue to have a shortfall, not only in quantity (24 beds), but also in quality. For example, there would continue to be multiple people per bedroom and supervisors living with their subordinates.

#### **Colter Bay Employee RV Campground**

The Colter Bay Employee RV Campground would continue to be operated at capacity and not have space available for seasonal employees who can live in their own camper, which is operationally less expensive than maintaining housing units.

#### **Jackson Lake Lodge Blue Heron Lounge Kitchen**

Food preparation for the Blue Heron Grill would continue to occur in two locations, the exterior patio area just north of the lounge where food is grilled; and the main kitchen on the 2<sup>nd</sup> floor at the south end

of the building, which also serves the formal dining area in the Mural Room and the casual Pioneer Grill. The outdoor grilling and eating area would remain on the deck, which has the potential to be a wildlife attractant. While standard operating procedures are in place to mitigate the risk of human-bear conflict associated with outdoor food preparation, some inherent risk remains. Additionally, the placement of the grill subjects the outdoor food service to frequent weather-related disruptions that result from wind and rain events. When the outdoor grill is closed, the Blue Heron Lounge would remain open with a limited menu served from the main lodge kitchen, located across the upper lobby from the lounge. During such service, trays of food would continue to be transported across the upper lobby's busy thoroughfare of visitors.

### **Colter Bay Campground Electric Hookup**

The current shortage of electrical hookups at Colter Bay Campground would continue. Of the 335 sites in Colter Bay Campground, 160 are tent-only sites, and of the remaining 175 sites, only 13 have electric hookups. Outside of the 13 electric hookups, visitors requesting electric hookup only would continue to be sent to the Colter Bay RV Park, which has 103 sites with water, sewer, and electric hookups.

### **Colter Bay Marina and Elk Island Accessibility**

The Colter Bay Marina main parking area would continue to lack ABAAS-compliant van, car, and oversized vehicle parking spaces. The marina would continue to lack ABAAS-compliant routes and walking surfaces from the parking areas to the restroom and down to the marina Lakeshore Trail. The men's and women's restrooms (at the top of the hill above the marina) would continue to have noncompliant accessibility features. The marina ramp, slips, and courtesy dock would continue to not meet ABAAS standards. The courtesy dock and its associated boat slip would continue to not have a 60-inch minimum width and boat slip clearances.

The Elk Island dinner cruise site dock, gangway, trail, cook site, and composting toilet would continue to not meet ABAAS standards.

### **Concessioner-Assigned Warehouse**

The concessioner-assigned warehouse and recycling facility in Colter Bay would remain in its current location. The warehouse's current location is in an area where NPS visitor and resource protection and maintenance operations take place. Operation of the warehouse would continue unchanged.

### **Colter Bay Employee Village North Dorm Room**

A large bunk room in the North Dorm at the Colter Bay Employee Village would continue to be used as is currently. No changes to the North Dorm would occur.

## **Alternative B – Issue Prospectus and New Concession Contract with Improvements to Fire Protection, Employee Housing, Visitor Amenities, and Accessibility (NPS Preferred Alternative and Proposed Action)**

The park would issue the prospectus and a new concession contract with proposed improvements to fire protection, new employee housing, visitor amenities, and accessibility (Figure 2). The proposed improvements would occur at various times of the year, as described below, over several years. If the improvements are ultimately included in the prospectus, the successful offeror would be required to undertake the improvements and may utilize a contractor to do so. Assets are and would continue to be owned by the NPS. The actions being considered for implementation are described below (see mitigation measures in Appendix A).

### **Fire Protection Enhancements**

Fire protection enhancements would be implemented to reduce fire hazards and achieve compliance with modern fire safety codes in various concessioner-assigned buildings at the park. Fire protection enhancements would occur primarily at Jackson Lake Lodge but would also include additional fire protection measures at the Jackson Lake Lodge employee recreation hall, Jenny Lake Lodge, Colter Bay employee housing area, and Colter Bay grocery store and laundry. Fire protection measures would be based on identified deficiencies and recommendations in the report *Fire Protection Analysis of Identified Buildings in Grand Teton National Park* (Jensen Hughes 2019).

The existing automatic sprinkler system in Jackson Lake Lodge, which currently provides only partial coverage of the structure, would be extended to protect the entire building, and the sprinkler system would be brought into compliance with modern fire safety codes. To meet current safety standards, the exit system would be reconfigured at the south end of the 3<sup>rd</sup> floor and at the north end of the 3<sup>rd</sup> floor. With the building fully covered by sprinklers, an escape ladder on the south end of the 3<sup>rd</sup> floor that does not meet code would become redundant and would be removed, and the existing hallway and exit door removed to prevent a dead-end corridor situation. A second exit at the north end of the 3<sup>rd</sup> floor would be brought up to modern fire safety codes by replacing a narrow exterior stairway with a wider stairway (Figure 3). An additional stairway would need to be added from the 2<sup>nd</sup> floor walkway to the ground. Additional fire protection improvements in Jackson Lake Lodge would include improving fire separation for several dumbwaiters in the 2<sup>nd</sup> floor main kitchen, main level hallway, and main level dishwashing room, and an exhaust duct in the Wyoming Room. Upgrades to Jackson Lake Lodge could also include improvements to fire doors, the fire alarm system, and electrical system, as needed. All of the above improvements would be made in keeping with the Secretary of Interior standards for historic preservation.

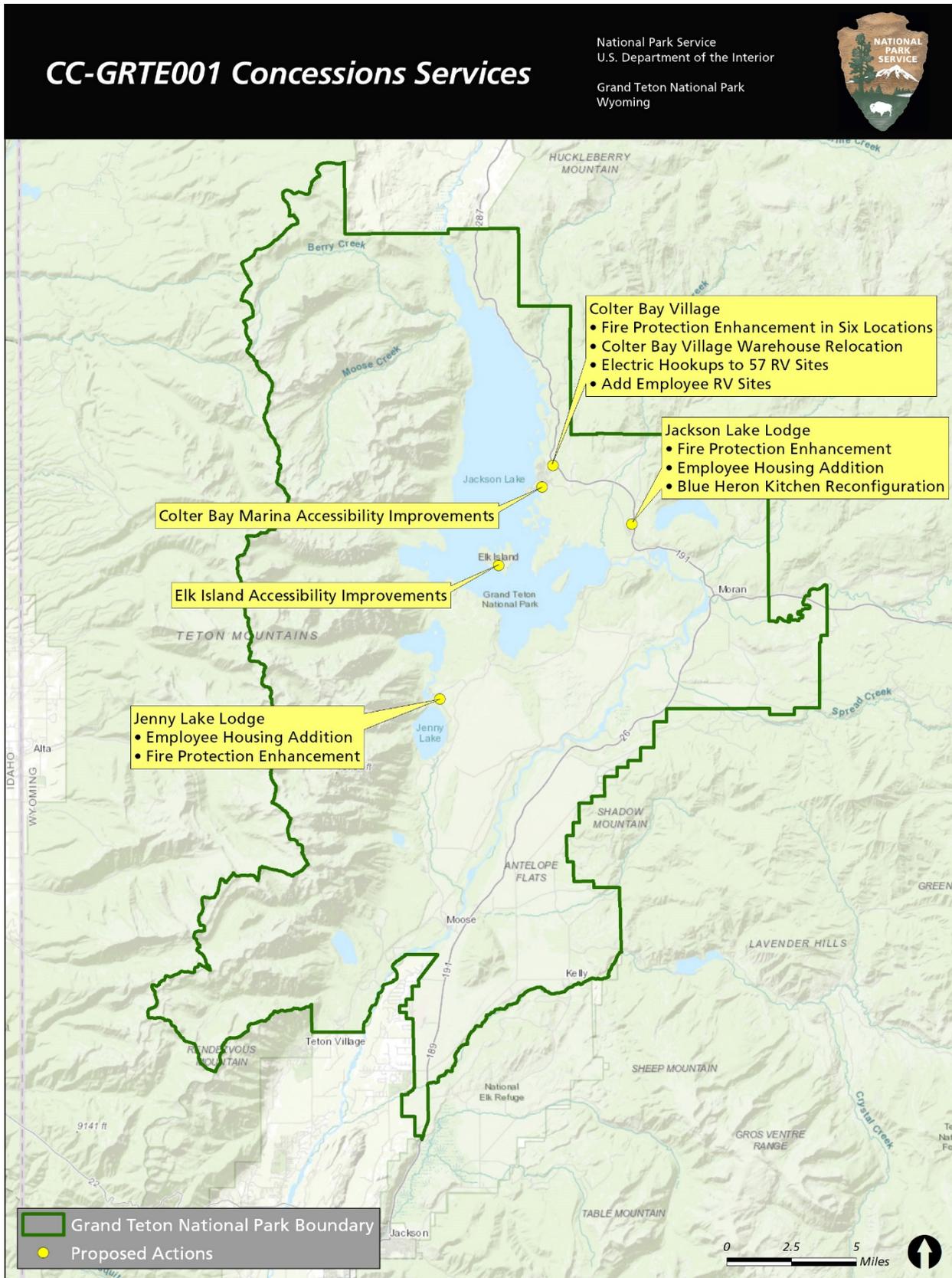
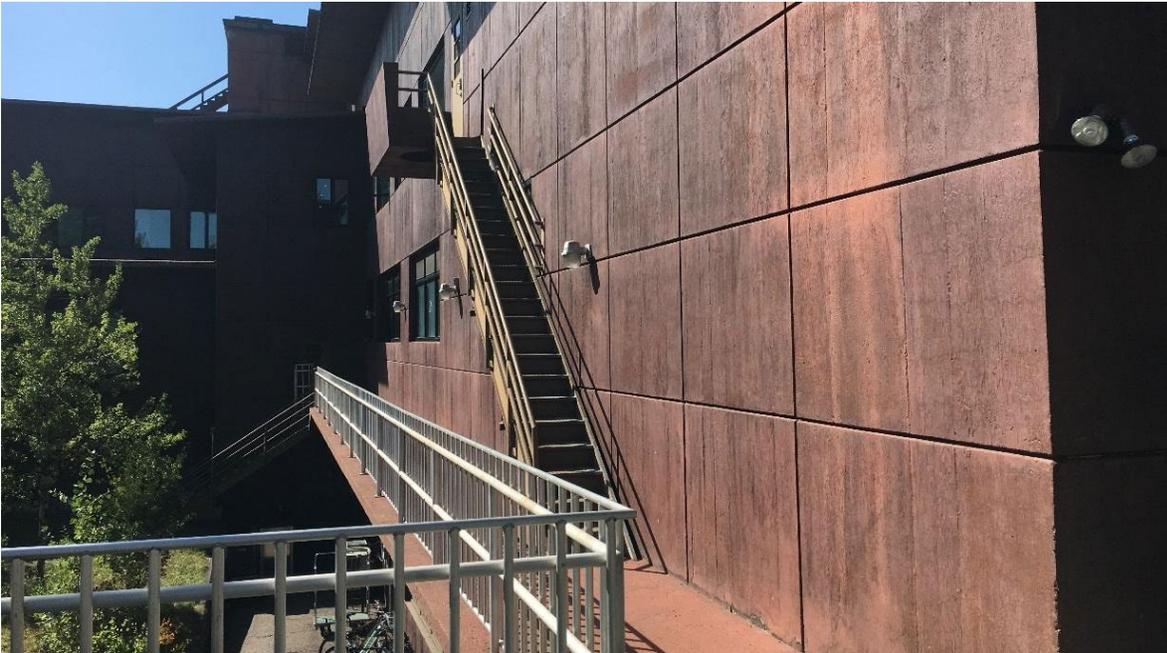


Figure 2. Proposed improvements under Alternative B.



**Figure 3. Noncompliant exterior stairway at Jackson Lake Lodge.**

In addition to the fire protection enhancements at Jackson Lake Lodge, Alternative B could include corrections to fire protection deficiencies identified in additional buildings at Jackson Lake Lodge, Jenny Lake Lodge, and Colter Bay.

- Fire safety improvements, potentially including new fire alarm systems and/or sprinklers, would be made to the Colter Bay employee housing area (North, East, South, and West Dorms and laundry area) as needed.
- Fire protection deficiencies at the grocery store and laundry at Colter Bay would be addressed to achieve compliance with modern fire safety codes, including upgrading the existing sprinkler system.
- The employee recreation hall in the Jackson Lake Lodge area would be brought up to modern fire safety codes, including installing a fire alarm and an automatic sprinkler system.
- Fire protection deficiencies at Jenny Lake Lodge would be corrected to achieve compliance with modern fire safety codes, including expanding the current sprinkler system to cover the entire premises, updating the sprinkler system to current safety standards, and correcting safety issues with exposed wiring and the kitchen hood suppression system identified in the Jensen Hughes (2019) report.

All interior work that could potentially disturb visitors would be completed in the off-season (November to April) to minimize impacts on visitors and staff. Minor work, such as installing signs and smoke seals would occur any time. Exterior work, including the egress improvements at Jackson Lake Lodge, would occur during the shoulder seasons (spring or fall) or would be planned to minimize disruptions to the visitor experience as described in mitigation measures/Best Management Practices in Appendix A. Fire protection enhancements would require detailed design and engineering documents, and the final project may vary from recommendations in the Jensen Hughes (2019) report; if changes are required that are not covered by this EA, additional compliance may be necessary.

## **Jackson Lake Lodge Employee Housing Addition**

Additional employee lodging would be constructed in the Jackson Lake Lodge housing area. The approximate location of the new units is shown in Figure 4. The new housing would have the potential of accommodating up to eight year-round employees. Additional paved parking for vehicles would also be added. The total living space of the six units would be 4,000 to 5,000 square feet. Four stand-alone one-bedroom units are proposed; however, these units could also be constructed as two duplexes or one fourplex. Similarly, the two 2-bedroom units are proposed as stand-alone buildings but could also be constructed as a duplex. The new buildings would be built in a style and appearance similar to existing employee housing at Jackson Lake Lodge, which consists of one-story frame buildings with wood panel siding. Water, sewer, and electric lines would be installed from the existing utility lines to the new houses. The work described above would occur on less than an acre of area within the Jackson Lake Lodge employee housing area and would be on ground that is either already compacted and barren of vegetation or on ground that is covered with grasses and shrubs. Once construction is complete, about half an acre of the area impacted during construction would be scarified and revegetated with a native seed mix or native plants. Work would occur during the April to November construction season during a period of approximately 5 years. Actual construction of each housing unit would take about 18 months; assuming construction of all units was done at once with adequate staffing, construction would take about 2 years.

## **Jenny Lake Lodge Employee Housing Addition**

Three cabins for 10 to 12 seasonal employees would be constructed at Jenny Lake Lodge (Figure 5). Two cabins would have electricity but no plumbing, consistent with the conditions of the existing seasonal housing units that depend on a central washroom/restroom. Each of these two cabins would have two rooms for two employees in each cabin. The third cabin would also have two rooms with electricity and plumbing to accommodate managers. The total living space for the three cabins would be 1,800 to 2,400 square feet. The new buildings would be occupied seasonally and would be built in a style and appearance similar to existing employee housing at Jenny Lake Lodge. Twelve new parking spaces would be added by expanding a nearby existing gravel parking area. Water, sewer, and electric lines would be installed from existing utility lines to the new buildings, where required. The above work would occur on less than 0.10 acre within the Jenny Lake Lodge employee housing area and would be on ground that is covered with common grasses and shrubs. Construction would occur during the April to November construction season. Actual construction of the additional cabins would take about 18 months total, assuming all were constructed at one time rather than phased over multiple years.

## **Colter Bay Employee RV Site Addition**

Six additional sites for RVs would be constructed at Colter Bay Campground in the RV Employee Loop (Figure 6). The additional sites would have full 50-amp hookups and would accommodate an additional 6 to 12 employees. Each of the six new sites would be about 20 feet wide by 50 feet long. Sites would be connected to existing utility lines using new water, sewer, and electric utility lines installed in trenches about 20 feet in length by 10 feet in width and about 4 to 6 feet deep. The new sites would be interspersed among existing sites on ground within the employee RV site that has mixed vegetation types, including shrubs and some trees. The total area impacted is estimated to be about 0.17 acre. Once construction is complete, about 0.03 acre would be scarified and revegetated with a native seed mix or native plants. Construction would occur in the April to November construction season, ideally in the shoulder season when water utilities are turned off. Actual construction of the sites would take approximately 4 weeks, assuming all were constructed at one time rather than phased over multiple months.

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Figure 4. Jackson Lake Lodge employee housing addition.

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Figure 5. Jenny Lake Lodge employee housing addition.

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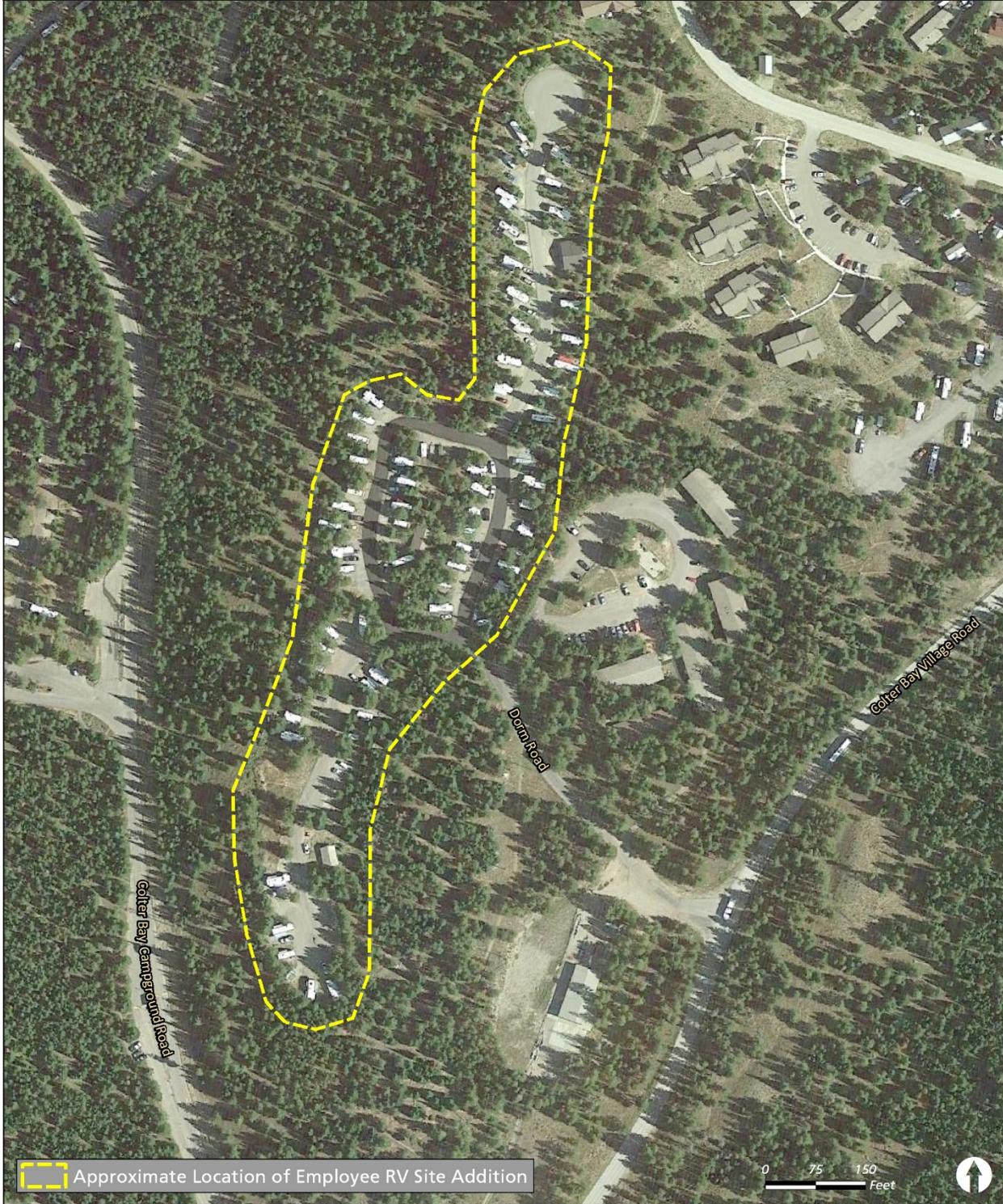


Figure 6. Colter Bay employee RV site addition.

## **Jackson Lake Lodge Blue Heron Lounge Kitchen Reconfiguration**

An existing room would be reconfigured as a full-service kitchen to serve the Blue Heron Lounge and replace the current outdoor cooking area. This project would help address long-standing challenges with the Blue Heron Lounge by moving the outdoor grill area indoors. Reconfiguring conference room space adjacent to the Blue Heron Lounge and creating a kitchen specific to the lounge would decrease outdoor food preparation, thereby reducing the potential for wildlife-human food-related incidents; lessen the impact of weather events; ease pressure on the main lodge kitchen; and reduce the frequency of food transport across the lobby.

The proposed kitchen would be directly connected to the Blue Heron Lounge in the moveable partition storage room at the south end of the Trappers Room in a portion of the lodge which does not contribute to the National Historic Landmark (NHL) designation. The new kitchen would connect via a pass-through to the Blue Heron Lounge, by incorporating a small, underused closet and an area adjacent to the existing dumbwaiter. The adjacent women's restroom would be reconfigured to relocate the three existing lavatories slightly to the east and additional framing would be added to allow for the proposed passageway from the kitchen to the lounge. The reconfiguration of the women's restroom would also provide for improved accessibility. The outdoor grill and resulting weather-related shutdowns would be eliminated, the capacity and efficiency of food preparation for the Blue Heron Lounge would be improved, and the potential for wildlife-human food-related incidents at the outdoor grill would be reduced. Construction would be planned for the park's off-season due to the heavy volume of visitors in the Jackson Lake Lodge area in the summer season. Reconfiguration of the kitchen would take about 4 months and would occur during the off-season (November to April) once Jackson Lake Lodge is closed for the winter season.

## **Colter Bay Campground Electric Hookup Expansion**

Electric hookups would be added to 57 existing RV campsites to meet increasing visitor demand. Hookups would be 50 amps and would add electric service to about one-third of the existing RV sites at the campground. The exact sites of the electric hookups have not been determined, but disturbance is estimated to be about 20 feet long by 4 feet wide at each site, or about 0.10 acre total for 57 sites; impacts would occur on ground within the campground that is currently covered with common vegetation, including some trees. A 2,000-foot-long by 4-foot-wide by 2-foot-deep trench would be needed to install a main electrical line to supply power to the sites, adding an additional approximately 0.19 acre of disturbance. Trenches would be located within existing road prisms. Once construction is complete, all impacted areas that were covered by vegetation prior to construction work would be scarified and revegetated with a native seed mix or native plants. Construction would be planned for the shoulder seasons (May to June or September to October) to minimize impacts on visitors but could include partial shutdowns of the campground when the campground is occupied. Actual construction of the electric hookups would take up to two months, assuming the work is not phased over multiple seasons.

## **Colter Bay Marina and Elk Island Accessibility Improvements**

As described in the *2019 Accessibility Self Evaluation and Transition Plan* (NPS 2019a), accessibility improvements would be developed for the parking area, access routes, ramps to the dock and tour boats, and marina comfort station (restroom) at Colter Bay Marina (Figure 7). Accessibility improvements at the marina would include repainting the existing paved parking lot to add two accessible car parking spaces and one accessible oversized vehicle parking space. A 3-foot-wide and 400-foot-long accessible route

would be constructed from the proposed parking spaces to the restroom and Lakeshore Trail. This new route would be a paved or elevated surface (such as a boardwalk), or a combination of paving leading to elevated walkways or ramps. If an elevated boardwalk is installed, helical piers (steel rods with an auger at the base that screw down into the soil) would be used. The existing restroom would be reconfigured to be wheelchair accessible. Accessible boat slips would be at least 5 feet wide. No in-water work would be required for the ramp improvements, nor would there be excavation below the normal water level of the lake. Creating an accessible route from the parking lot to the docks and creating accessible access to the docks along the shoreline would disturb about 0.8 acre. The above work, except for the new accessible trail, would occur on existing pavement or ground that is previously disturbed and compacted or barren of vegetation. The accessible trail would be constructed on ground that is covered with common grasses and shrubs and adjacent to some conifer trees.

Accessibility improvements would also be implemented at Elk Island (Figure 8). Improvements would involve installing a 900-foot-long by 4-foot-wide paved accessible route from the dock to the picnic site and fire ring and to the restroom. The above work would occur on less than 0.7 acre of area on the island and would be on ground that is previously disturbed, compacted, and barren of vegetation or on ground that is covered with common grass and shrub vegetation and scattered trees. Once construction is complete, about 0.6 acre would be scarified and revegetated with a native seed mix or native plants.

Construction at both Colter Bay Marina and Elk Island would be planned for the spring and/or fall shoulder seasons to minimize impacts on the visitor experience. Construction would likely last about 6 to 8 weeks total, assuming work is not phased over multiple seasons.

## **Warehouse Relocation**

An existing 6,174-square-foot concessioner-assigned warehouse and recycling facility at the Colter Bay Administrative Area would be relocated to a new location nearby (Figure 9). Relocating the warehouse would allow consolidation of NPS and concessioner activities in separate areas. This would involve either physical relocation of the existing structure or construction of a new structure and removal of the old structure.

Physical relocation of the existing warehouse to a currently vacant location near the intersection of Colter Bay Village Road and Dorm Road (Figure 9) would entail removing the building from its current foundation, dismantling the existing building using standard deconstruction techniques, and transporting it on trucks using park roads to its new location. A new foundation would be constructed for the warehouse at this new location.

If the existing warehouse were to be removed and replaced with a new building, the existing building would be demolished, and the debris would be removed from the park for disposal. A new foundation and warehouse would be constructed at the currently vacant location near the intersection of Colter Bay Village Road and Dorm Road described above.

Regardless of whether the warehouse is relocated or demolished and replaced, construction in the new location would occur in an area that is previously disturbed and sparsely vegetated. The building in the new location would be up to 10 to 15 percent larger (up to 7,100 square feet) than the existing 6,174-square-foot building. Parking would occur in the existing parking area east of the building site; a new parking area would not be needed. Construction would occur during the April to November construction season and would take about 6 to 8 months.

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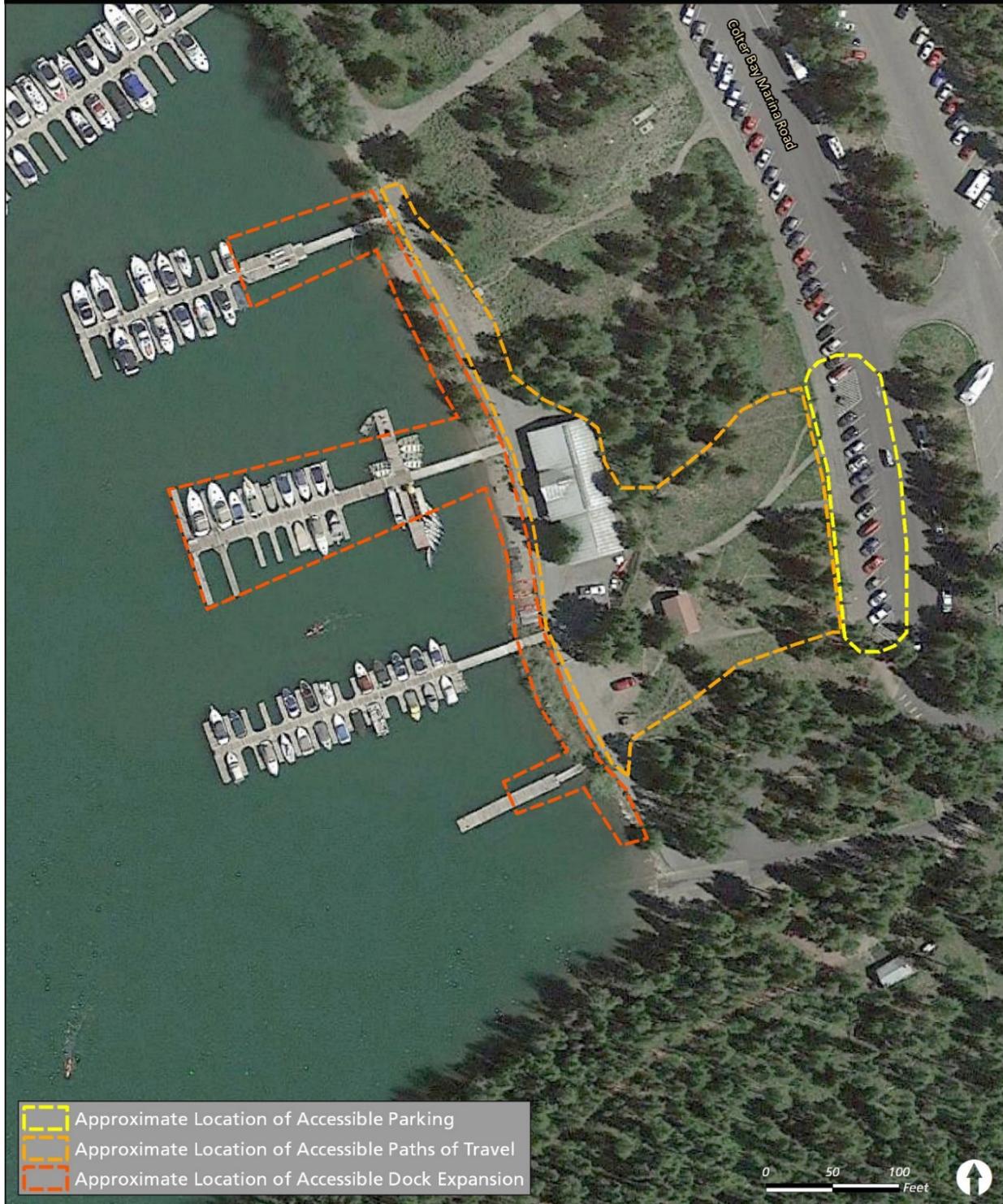
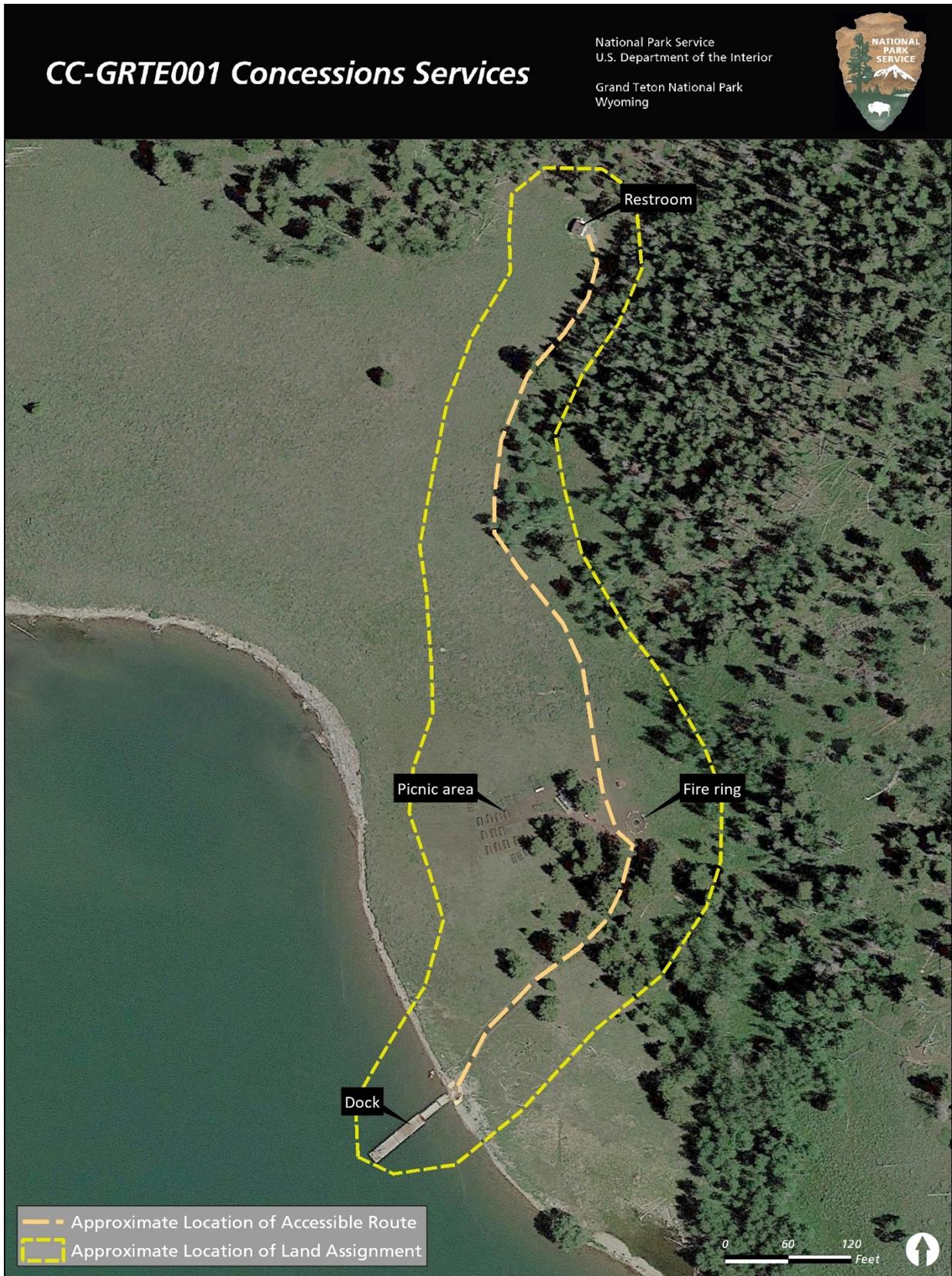


Figure 7. Colter Bay Marina accessibility improvements.



**Figure 8. Elk Island accessibility improvements.**

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Figure 9. Warehouse relocation.

## Colter Bay Village North Dorm Room Conversion

A bunk room in the North Dorm at the Colter Bay Employee Village would be reconfigured as two employee dorm rooms. The room is currently used as a large bunk room. One exterior door would be eliminated, two interior doors would be installed, and a partition wall would be constructed to create the two new dorm rooms. This would not result in the addition of any beds or housing capacity. Work would occur in the off-season and take approximately 3 weeks to complete.

### Staging and Access

All access to construction sites would be on existing park roads. Staging would occur at Colter Bay (potentially at the Colter Bay “boneyard”), Jackson Lake Lodge, and Jenny Lake Lodge. If needed, additional staging could occur at already established staging areas that are used for park and contractor construction, storage, and staging. These staging areas are already used to store park equipment and materials, are often used for staging for other projects, and are located away from visitor areas. Potential staging areas would occur in the following locations:

- Approximately 1.5 miles south of Flagg Ranch, west of John D. Rockefeller Parkway;
- Approximately 0.5 mile northeast of Lizard Creek Campground;
- Approximately 1 mile east of Colter Bay;
- Approximately 2 miles south of Signal Mountain, east of Teton Park Road;
- Approximately 1 mile east of the Jackson Hole Airport (east of U.S. Highway 89); and
- Within the Kelly Pit.

Staging areas would be in previously disturbed sites that are already compacted and devoid of vegetation, away from visitor use areas to the extent possible. All staging areas would be returned to pre-project conditions following completion (i.e., all equipment would be removed and the ground would be regraded if necessary). Parking of construction vehicles would be limited to these staging areas, existing roads, and previously disturbed areas.

The equipment that would be used for construction and, therefore, placed at the staging areas could include standard construction equipment such as backhoes/excavators, pickup trucks, and cars (daily transport use for workers). If prefabricated buildings are used, a large crane would be needed. Fuel would not be stored at staging and construction areas. Fuel would be delivered by fuel handling services previously approved by the NPS.

## Issues Identified for Further Analysis

Based on internal scoping, the following issues were identified for further analysis:

- Human Health and Safety
- Visitor Use and Experience

## Issues Considered but Dismissed from Detailed Analysis

The following issues were dismissed because there would be no effects, or the effects would be inappreciable. Per the NPS NEPA Handbook (NPS2015), issues were retained for consideration and discussed in detail if:

- the environmental impacts associated with the issue are central to the proposal or of critical importance;
- a detailed analysis of environmental impacts related to the issue is necessary to make a reasoned choice between alternatives;
- the environmental impacts associated with the issue are a big point of contention among the public or other agencies; or
- there are potentially significant impacts on resources associated with the issue.

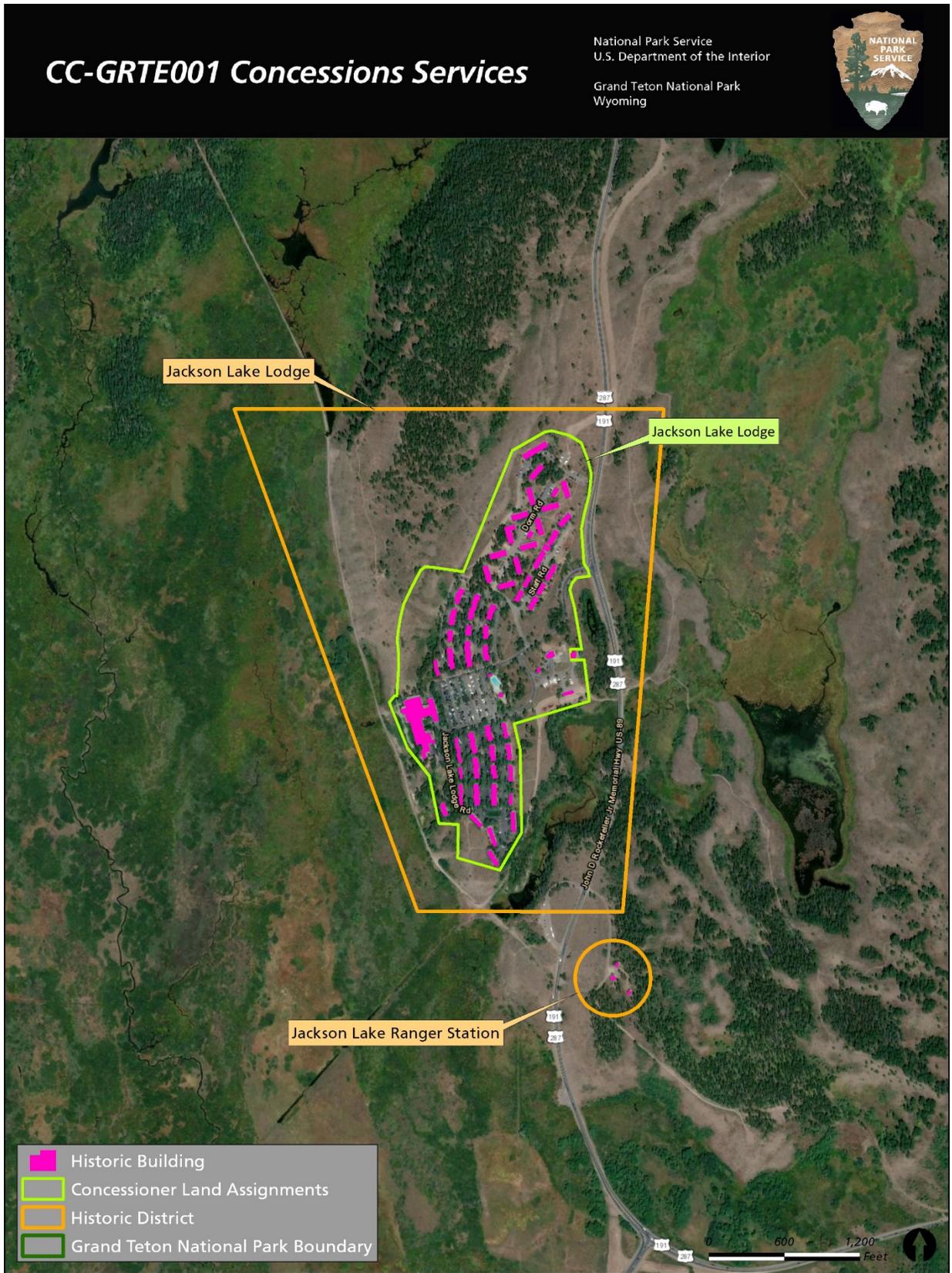
If none of the considerations above apply to an issue or impact topic, it was dismissed from detailed analysis.

### Cultural Resources

Under the new concession contract, the concessioner would be responsible for the operation and maintenance of historic properties in accordance with concessions contract GRTE001. Historic properties in concessioner-assigned areas are shown in Figure 10 (Jackson Lake Lodge), Figure 11 (Jenny Lake), and Figure 12 (Colter Bay). All maintenance, improvements, and occupancy of historic structures would comply with the *Nationwide Programmatic Agreement for National Historic Preservation Act, Section 106 Compliance*. If additional projects or significant changes to existing operations arise in the course of prospectus development and the implementation of the new contract, additional NEPA and compliance under Section 106 of the National Historic Preservation Act may be necessary. If such changes or projects do not qualify for streamlined review under the park's existing NPS *Nationwide Programmatic Agreement for National Historic Preservation Act, Section 106 Compliance*, the NPS would consult with the Wyoming State Historic Preservation Office, interested tribes, and other interested parties under the National Historic Preservation Act Section 106 standard review process.

#### *Archeological Resources*

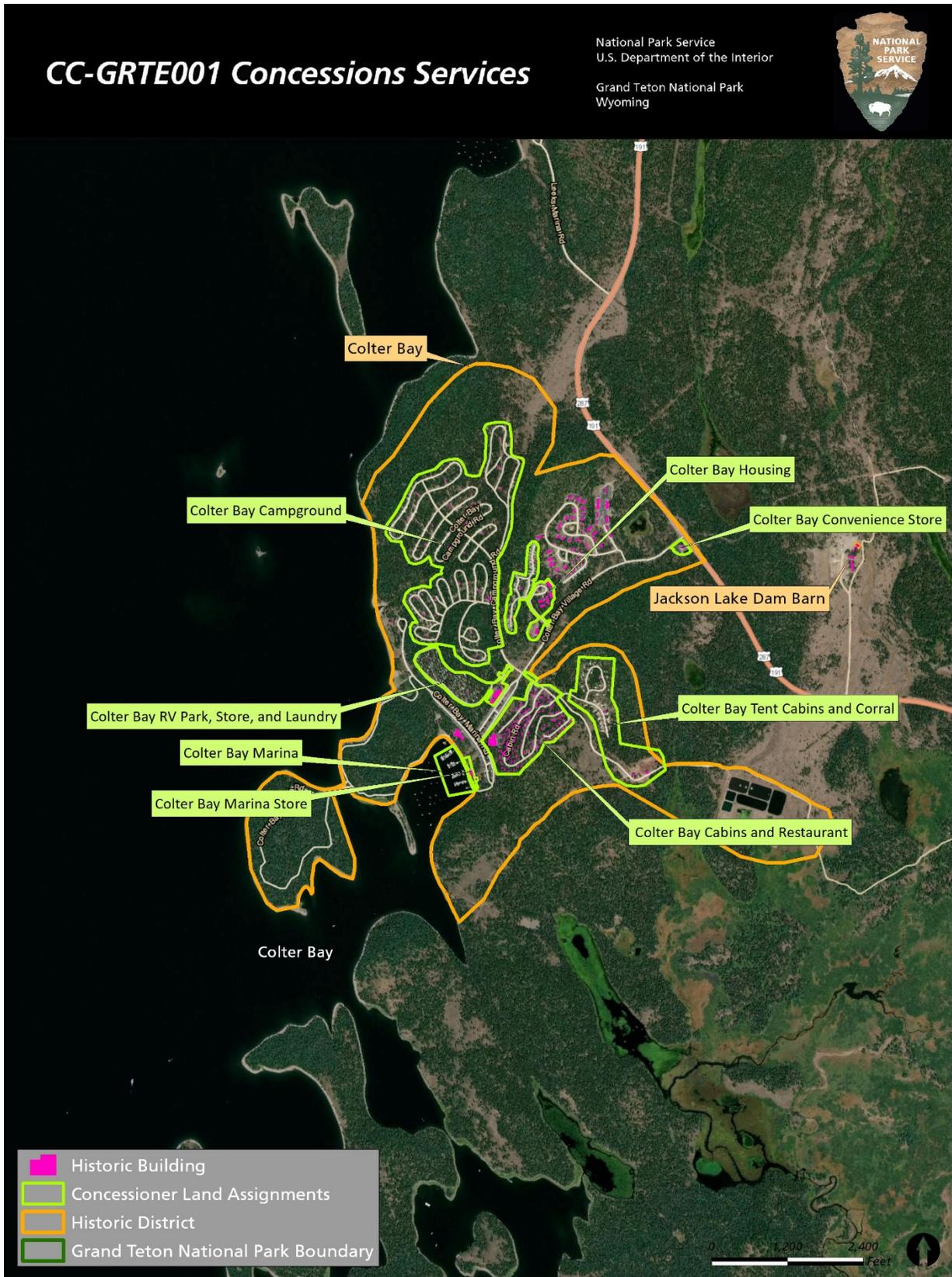
No new impacts on archeological resources are expected under Alternative A, because no new construction would occur. Each concession land assignment has been inventoried for cultural resources (ERO 2020). No known archeological resources would be affected by the proposed activities under Alternative B. Unknown subsurface archeological resources could inadvertently be impacted during construction. If archeological resources were uncovered during construction, all work in the immediate vicinity of the discovery would be halted until the resource could be documented and evaluated for National Register significance and, if the resource cannot be preserved in situ, an appropriate mitigation plan would be developed in consultation with the Wyoming State Historic Preservation Officer and interested American Indian tribes associated with the resources in the park. Any data recovery would be completed before any further construction disturbance to the archeological resource could occur. With implementation of Mitigation and Best Management Practices (Appendix A), adverse impacts on archeological resources would be avoided or minimized.



**Figure 10. Historic buildings, historic districts, and the concessioner-land assignment at Jackson Lake Lodge, concessions contract GRTE001.**



Figure 11. Historic buildings, historic districts, and concessioner-land assignments at Jenny Lake, concessions contract GRTE001.



**Figure 12. Historic buildings, historic district, and the concessioner-land assignment at Colter Bay, concessions contract GRTE001.**

*Historic Structures, Historic Districts, and Cultural Landscapes*

No new impacts on cultural resources are expected under Alternative A because no new construction would take place. Each concession land assignment has been inventoried for cultural resources, and although the proposed activities would occur within historic properties under Alternative B, those activities would be conducted in accordance with the Secretary of the Interior's Standards for Historic Preservation to avoid adverse effects.

**Jackson Lake Lodge.** Proposed projects at Jackson Lake Lodge include adding fire protection upgrades in the lodge (extending the sprinkler system, altering or removing fire escapes and doors, and updating electrical and alarm systems to meet code); adding 4,000 to 5,000 square feet of new employee housing within the historic district, totaling 0.12 acre of disturbance; and reconfiguring the Blue Heron Lounge and surrounding area to add an interior kitchen within the lodge.

Jackson Lake Lodge was designated a NHL in 2003 and is significant as one of the first examples of modern architecture in the NPS (NHL; Reed and Wallace 2002). Built during a transitional period, the historic district uniquely combines rustic and modern design elements and was a precursor to the NPS Mission 66 program. Jackson Lake Lodge also is important as the last major work of architect Gilbert Stanley Underwood. The period of significance spans from 1953 to 1960. A reevaluation of this period of significance is currently being undertaken for a NHL update due to significant structural and landscape additions now being more than 50 years old. The entire NHL listing includes 39 contributing resources and 23 noncontributing resources and is a cultural landscape.

Fire protection enhancements are recommended in the Jackson Lake Lodge Historic Structure Report (The Architectural Conservation Laboratory 2017), and protection and preservation of the structure necessitate bringing all systems up to appropriate fire code. The interior of the lodge, particularly the large public spaces, are contributing elements of the NHL, and all enhancements would adhere to the Secretary of the Interior's Standards for Historic Preservation to avoid adverse effects. The Blue Heron Lounge and conference area was constructed in the 1990s and is a compatible noncontributing element of the NHL; therefore, interior reconfiguration of the area to construct a kitchen would not cause any adverse effects on the historic property. The Cultural Landscape Report (CLR) (Logan Simpson 2015) defines the employee housing zone as a contributing feature of the NHL district, with its cluster arrangement and land use of particular importance. The CLR further defines that future housing additions should be grouped with the noncontributing modern housing additions toward the north end of the employee zone and screened from both Highway 89 and the rest of the contributing employee housing units with compatible landscaping. All new housing units would be one-story structures, compatible in design and massing with the character of the overall district and would follow the recommendations set forth in the CLR; therefore, there would be no adverse effects on the NHL district.

**Jenny Lake Lodge.** Projects proposed at Jenny Lake Lodge include fire protection upgrades within the lodge and the addition of three seasonal housing units and associated parking, resulting in 0.1 acre of disturbance.

The Jenny Lake Lodge Historic District was added to the National Register in 2010 with a period of significance from 1922 to 1958. It is significant under Criterion A for its association as a property acquired by John D. Rockefeller's Snake River Land Company and under the theme of Dude Ranching and Tourism, and under Criterion C for its embodiment of rustic-style architecture (Humstone et al. 2009). The district is a significant cultural landscape embodying Western-style hospitality, with 41 of 47 buildings dating from the period of significance. It maintains its character through the tradition of log construction, consistency of design, and natural landscaping.

Fire protection enhancements within the historic structures at Jenny Lake Lodge are necessary for the protection and preservation of the structures. Structures would be brought up to appropriate fire code. The public spaces of the interior of the main lodge are contributing elements of the historic district, and all enhancements would adhere to the Secretary of the Interior's Standards for Historic Preservation to avoid adverse effects. The employee area provides essential historic character to the district and has contributing elements such as cabins that are similar but not identical to guest cabins, communal facilities, and the western tradition of moving cabins from other properties. The construction of three new cabins would be compatible with the district by continuing to employ communal facilities, using design styles that are in the rustic style, and adding natural compatible landscaping. The new cabins would be compatible noncontributing structures within the historic district, and there would be no adverse effect on the district.

**Colter Bay.** Projects proposed at Colter Bay include fire suppression upgrades in six structures (four employee dorms and grocery and laundry buildings), relocation of the concessioner warehouse, conversion of a bunk room to two dorm rooms in the north concessioner employee dorm, addition of 6 to 12 employee RV sites within the employee loop resulting in 0.14 acre of disturbance, campground hookup expansions at more than 57 sites totaling 0.1 acre of disturbance, and accessibility updates at the marina.

The Colter Bay Developed Area Historic District (Colter Bay) consists of 12 distinct areas of buildings, structures, and landscaping over 712 acres (Engle 2011). Colter Bay is eligible for listing in the National Register as a historic district under Criteria A and C for its association with NPS Mission 66 planning and development and philanthropy (Criterion A) and for architecture and landscape architecture (Criterion C). The period of significance is 1950 to 1972 (Engle 2011). Colter Bay was developed as a collaborative effort between the Grand Teton Lodge Company and the park. The developed area consists of 269 resources, of which 200 contribute to the district. Of the 200 contributing resources, 188 are buildings and 12 are landscape features (Engle 2011). Most notably, Colter Bay was an NPS Mission 66 pilot project intended to centralize visitor impacts on a specific area, thereby limiting visitor impacts elsewhere and preserving larger park landscapes and viewsheds. While the area has a modernist intent, rustic style architecture was still incorporated into the guest cabins and through the use of trees to sequester the different clusters of buildings.

Fire protection enhancements within the historic structures at Colter Bay are necessary for the protection and preservation of the structures. The employee dorms and laundry building are contributing resources to the district, while the grocery is noncontributing. Structures should be brought up to appropriate fire code in accordance with the Secretary of the Interior's Standards for Historic Preservation. The warehouse relocation would move the warehouse from a noncontributing park administrative area to a noncontributing concessioner administrative area, adjacent to a noncontributing service station in a previously disturbed area free of substantial vegetation. Both administrative areas are well screened through landscaping and topography as not to impact any contributing areas of the district. While the north dorm is a contributing resource in the district, the changes would not be visible from the exterior of the structure (the interior does not contribute to its integrity), with the exception of the removal of one exterior door. This alteration would be made in accordance with the Secretary of the Interior's Standards for Historic Preservation and would result in no adverse effect on historic properties. The concessioner employee RV loop is noncontributing to the district. Because the RV site additions would be undertaken in the existing loop, this should have no adverse effect on nearby contributing resources as they would be screened by vegetation and topography. The Colter Bay Campground is a contributing element of the historic district. Although the installation of utility hookups would cause short-term impacts on contributing vegetation, there would be no adverse effect on the historic district due to revegetation and maintained vegetative screening. The marina and docks at Colter Bay are noncontributing to the historic

district, and the marina comfort station and circulation patterns are contributing. Accessibility improvements in contributing areas would be made using the Secretary of the Interior's Standards for Historic Preservation and, therefore, would avoid adverse effects.

**Elk Island.** Accessibility improvements are proposed within the concessioner land assignment on the island. The recreation area contains a boat dock, trail, picnic area and fire ring, vault toilet, and informal trails. An archeological survey conducted by ERO (2020) did not result in the identification of any archeological sites or other cultural resources. Park cultural resource staff determined that no resources on the island are of exceptional importance to warrant evaluation for listing in the National Register under Criteria Consideration G (*National Register Bulletin: Guidelines for Evaluating and Nominating Properties that Have Achieved Significance Within the Last Fifty Years*).

## Vegetation

No new impacts on vegetation are expected under Alternative A, because no new construction would occur. Under Alternative B, constructing new employee lodging at Jackson Lake Lodge and Jenny Lake Lodge, new employee RV sites and electric hookups at Colter Bay, new accessibility improvements at Colter Bay Marina and on Elk Island, and relocating a warehouse and recycling facility would result in impacts on vegetation. Vegetation types affected would include grasslands, shrublands, and fir or pine trees, all of which are common in the park. Rare plant surveys would be conducted before construction to ensure no impacts would occur on rare plants; if found, plants would be relocated off-site or flagged to ensure construction activities would avoid them. Additional mitigation measures would be implemented (as described in Appendix A *Mitigation and Best Management Practices*) to prevent the spread of exotic plant species as the result of vegetation and soil disturbance and to avoid or minimize impacts on existing trees near the project area. A total loss of up to about 2.0 acres of mixed vegetation would occur to construct new facilities. About 0.8 acre would be revegetated following construction and would continue for a period of about 5 years.

## Wildlife

No impacts on wildlife are expected under Alternative A, as no new construction would occur. Actions under Alternative B would occur in grassland, shrubland, and coniferous forest habitats. Wildlife that move through and that are found adjacent to the project area for Alternative B include elk (*Cervus canadensis*), mule deer (*Odocoileus hemionus*), moose (*Alces alces*), black bear (*Ursus americanus*), migratory birds, and small mammals. Under Alternative B, about 2.8 acres of habitat for these species would be impacted by project actions, including about 2 acres that would be permanently lost. However, the habitat is considered poor because of the amount of previous disturbance and high use of the areas by park visitors and staff. Construction activities and noise could result in displacement of individual wildlife during the construction period, which could last from about 3 weeks to 2 years depending on the specific action, with the overall project occurring up to 5 years. Although this displacement could impact wildlife at the individual level, there would be no impacts on wildlife populations because the total habitat loss would be limited to less than 3 acres, impacts would occur in previously disturbed areas and in areas with high use by visitors and staff, and because mitigation measures would be implemented as described in Appendix A. Best management practices include prohibiting construction activities before 8 a.m. and after 6 p.m. during the elk rutting and migration period, avoiding construction activities in crucial ungulate winter ranges (December 15 to April 15) and in identified ungulate parturition ranges (May 15 to June 30), implementing food storage restrictions, and using wildlife-friendly fencing.

## Threatened and Endangered Species

The U.S. Fish and Wildlife Service (USFWS) Ecological Services Office in Cheyenne, Wyoming, provided a list of threatened, endangered, proposed, and candidate species that may occur in areas affected by the alternatives (USFWS 2019). The USFWS list included Canada lynx (*Lynx canadensis*), grizzly bear (*Ursus arctos*), North American wolverine (*Gulo gulo*), yellow-billed cuckoo (*Coccyzus americanus*), whitebark pine (*Pinus albicaulis*), and western glacier stonefly (*Zapada glacier*). Critical habitat for Canada lynx was also identified as occurring in the park. Mitigation measures for threatened and endangered wildlife would be implemented to avoid and minimize impacts on these species, as described in Appendix A. No impacts on threatened and endangered species are expected under Alternative A. A biological assessment (BA) was prepared for Alternative B, which contains full species descriptions, habitat information, and a determination of effects regarding these federally listed and proposed species. The BA included a determination of “may affect, is not likely to adversely affect” for Canada lynx and its critical habitat, grizzly bear, and North American wolverine, as described in greater detail below. The BA also included a determination of “no effect” for the whitebark pine, western yellow-billed cuckoo, and western glacier stonefly because there is no habitat for these species in the project area. The USFWS concurred with the NPS’s determinations in a letter dated April 3, 2020.

Concessions operations under the contract would be subject to strict contract requirements that prescribe best management practices to limit and mitigate impacts to listed species, including impacts from human-grizzly bear interactions. Any significant changes to existing operations or new projects would undergo independent consultation under Section 7 of the Endangered Species Act.

### *Canada Lynx and Critical Habitat*

Past observations of Canada lynx have occurred near the project area, and lynx may occasionally use the area when moving between patches of suitable habitat elsewhere. The project area contains mapped suitable habitat and designated critical habitat in the Jackson Lake Lodge and Colter Bay areas; however, the project activities would occur in areas mapped as nonhabitat. Alternative B would result in impacts on about 2.8 acres of vegetation in previously disturbed areas, which is a relatively small impact given the amount of available habitat in the park. The behavior of lynx in the action area may be slightly altered by increased levels of noise, traffic, and human activity, but these changes would be small and would not result in take. There is a small, but very unlikely, risk of collision with a project-related vehicle traveling on North Park Road or other park roads. No incidental take is expected as a result of Alternative B. For these reasons, the BA determined that Alternative B may affect, but is not likely to adversely affect, the Canada lynx because the effects would be negligible for the reasons previously described.

Alternative B would result in impacts on 0.52 acre of vegetation within critical habitat at Jackson Lake Lodge and about 1.48 acres of vegetation within critical habitat in the Colter Bay area. Impacts would occur in previously disturbed nonhabitat areas. The amount of critical habitat affected would be small relative to the amount of designated critical habitat available in the park, and the action area would still provide the physical and biological features for Canada lynx critical habitat following construction. For these reasons, the BA determined that Alternative B may affect, but is not likely to adversely affect, critical habitat for the Canada lynx.

### *Grizzly Bear*

Alternative B would result in the loss of less than 2.8 acres of grizzly bear habitat. No denning sites are known to occur within the project area. The increased noise and human presence during construction is not expected to substantially change grizzly bear use of the area. Alternative B would result in an increased level of traffic during construction. The increased risk of grizzly bear mortalities on North Park Road or other park roads would be negligible given the small increase in traffic on these heavily travelled

roads. Implementing conservation measures for food storage and educating construction workers and concessioner employees about grizzly bears would reduce the likelihood of bears becoming food conditioned to a discountable level. As previously described, If existing operations were to be modified in way that affects bear management or if new projects are proposed in the course of prospectus development or contract execution, such changes would undergo independent consultation under Section 7 of the Endangered Species Act. In addition, concessions operations under the contract would be subject to strict contract requirements that prescribe best management practices to limit and mitigate impacts on this listed species, including impacts from human-grizzly bear interactions. For these reasons, the BA determined that Alternative B may affect, but is not likely to adversely affect, the grizzly bear.

#### *Wolverine*

Alternative B would result in the loss of less than 2.8 acres of vegetation that could provide habitat for wolverines and would not affect snow cover that could be used for denning. The behavior of wolverines in the area may be slightly altered by increased levels of noise, traffic, and human activity, but these changes would be negligible and would not result in take. Alternative B would result in an increased level of traffic during construction. The increased risk of wolverine mortalities on park roads would be negligible given the small increase in traffic on these heavily travelled roads. For these reasons, Alternative B is not likely to adversely affect the continued existence of the wolverine.

## AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This chapter describes the current conditions (existing setting or baseline conditions) and analyzes the environmental consequences (impacts or effects) that would occur as a result of implementing the alternatives. Cumulative effects are also analyzed.

### Human Health and Safety

#### Affected Environment

Jackson Lake Lodge and several other concessioner-assigned facilities in the park do not meet modern fire safety codes. Jackson Lake Lodge and Jenny Lake Lodge have only partial coverage by automatic sprinkler systems. In addition, an escape ladder on the south end of the 3<sup>rd</sup> floor and a narrow exterior stairway at the north end of the 3<sup>rd</sup> floor at Jackson Lake Lodge do not meet modern fire safety codes for fire escape routes. An assessment of fire hazards (Jensen Hughes 2019) found numerous deficiencies at Jackson Lake Lodge, including the need for improved fire separation for several dumbwaiters and an exhaust duct, needed improvements to fire doors, and the need to improve the fire alarm system and electrical system. The Jensen Hughes assessment (2019) recommended upgrading the automatic sprinkler system at Jackson Lake Lodge due to the lodge's residential mixed-use occupancy and the high potential for a delayed emergency response due to the lodge's remote location.

The assessment also identified numerous additional issues with fire safety, including the potential need to bring several buildings into compliance with modern fire safety codes, including the employee recreation hall at Jackson Lake Lodge, the employee dorms and laundry area at Colter Bay Village, and the grocery store and laundry area at Colter Bay. These facilities do not meet current fire safety codes and would need upgrades to fire alarm and automatic sprinkler systems.

#### Environmental Consequences

*Alternative A – Issue Prospectus and New Concession Contract without Improvements to Fire Protection, Employee Housing, Visitor Amenities, and Accessibility (No Action)*

Continued use of Jackson Lake Lodge, the employee recreation hall at Jackson Lake Lodge, Jenny Lake Lodge, and the Colter Bay employee housing area without implementing fire protection improvements would continue to pose a potential safety risk to visitors and staff from potential future fires. If additional fire protection measures are not implemented, the potential exists that occupancy at Jackson Lake Lodge and other noncompliant buildings may need to be reduced (see Visitor Use and Experience Environmental Consequences Alternative A for details).

**Cumulative Effects** – Past, present, and reasonably foreseeable future actions that have impacted or would impact human health and safety include past and future improvements to fiber optic and cellular service within park developed areas, including the areas described in this EA; routine maintenance of roads and other facilities; and completion of the nationwide first responder network, FirstNet2, which would improve emergency communications. These projects have resulted in long-term beneficial impacts on health and safety from repairing and rehabilitating park infrastructure to improve visitor and employee safety and from improving communications infrastructure, which would improve communication in emergency situations. Alternative A could result in health and safety risks to visitors and park staff over

the long term from unaddressed fire egress risk. When the effects of Alternative A are combined with other past, present, and reasonably foreseeable future impacts, the total cumulative impacts on health and safety would continue to be beneficial, with a moderate adverse contribution from Alternative A.

*Alternative B – Issue Prospectus and New Concession Contract with Improvements to Fire Protection, Employee Housing, Visitor Amenities, and Accessibility*

Alternative B would include fire protection measures to bring concessioner-assigned structures up to best professional standards and safety compliance. Upgrading fire protection systems and improving egress would address the fire safety deficiencies of Jackson Lake Lodge, the recreation hall in the employee housing area at Jackson Lake Lodge, Jenny Lake Lodge, and the Colter Bay employee housing area. Implementing these measures would improve visitor and employee safety by reducing the risk of injury, death, or damage from fire.

The use of construction equipment, increased truck traffic, and brief interference with traffic flow could produce potential hazards. Risks would be limited by providing information on the actions to visitors, placing barriers near construction zones, controlling traffic, following standard construction safety practices, and by conducting most work during the shoulder seasons when there are fewer visitors at the park.

Overall, implementing fire safety improvements would result in long-term beneficial effects on human health and safety. These benefits would support the core NPS value of protecting the health and safety of visitors and employees and would persist indefinitely if the improved fire protection systems continue to be maintained and implemented.

**Cumulative Effects** – The overall impacts of past, present, and reasonably foreseeable actions on human health and safety would be beneficial as described for Alternative A. Past and ongoing projects in and near the project area have been implemented to improve visitor and employee safety, while protecting park resources, resulting in long-term beneficial effects on health and safety. Over the long term, the cumulative effects on public health and safety associated with Alternative B would be beneficial. When the effects of Alternative B are combined with other past, present, and reasonably foreseeable future impacts, the total cumulative impacts on health and safety would be beneficial, with a substantial beneficial contribution from Alternative B.

## Visitor Use and Experience

### Affected Environment

The park provides a wide range of recreational opportunities for visitors, including sightseeing, mountain climbing, hiking and backpacking, skiing, snowshoeing, camping, fishing, wildlife and bird watching, horseback riding, boating, rafting, bicycling, and photography. In 2018, about 68 percent of visitors were recreation visitors, defined as persons who enter onto lands or waters administered by the NPS for recreation purposes. The park has seen a rise in recreation visitors since 2008, with nearly 40 percent growth between 2008 and 2018 (NPS 2019b).

Visitor use in the park is primarily concentrated in the major developed areas, such as Jenny Lake, Jackson Lake Lodge, Moose, and Colter Bay. Park visitation is the highest during the summer season, which runs from May until September, with peak use occurring in July and August (NPS 2019b). The concession and NPS visitor facilities are generally open May 15 through October 15 and the lodges, campgrounds, and cabins often operate at full capacity, especially in July and August.

Visitor opportunities at Jackson Lake Lodge include lodging, casual and fine dining, fuel and grocery services, and various retail and recreational opportunities. Jackson Lake Lodge has 385 rooms including 37 in the main lodge as well as rooms in suites and cottages surrounding the main lodge. During the 2019 summer season, Jackson Lake Lodge was open from May 17 until October 6. Currently, the Blue Heron Lounge kitchen is located outside and must be shut down during inclement weather, reducing the lounge's capacity and efficiency to provide food to visitors.

Visitor opportunities at Jenny Lake Lodge include lodging, fine dining, and various recreational opportunities. Jenny Lake Lodge includes a central lodge with dining and 37 cabins. During the 2019 summer season, Jenny Lake Lodge was open from June 1 to October 6.

The Colter Bay Campground provides overnight RV and tent camping sites, lodging, quick service and family casual restaurants, retail and grocery stores, and a convenience store, shower, and laundry facility. The campground provides 335 individual non-electric campsites, 11 large group campsites, and 13 ABA accessible sites with electric hookup. Of the 335 sites, 160 are tent-only sites. The campground has 22 restrooms with flush toilets and cold running water. Paid showers and coin-operated laundry services are available at the Colter Bay Launderette. During the 2019 summer season, the campground, shower, and laundry were open May 23 to September 29. The NPS permits primitive winter camping in the parking lot adjacent to the Colter Bay Visitor Center from December 1 to April 15 (NPS 2019c).

The Colter Bay Marina provides visitors with various recreational activities and services including Jackson Lake boat tours, boat rentals, boat slips, and buoys. The marina also serves as a launch site for the Elk Island cruise and cookout (NPS 2019c). The marina provides 389 passenger vehicle parking spaces for visitors, with 38 oversized spaces for RVs and vehicles towing boat trailers and 5 bus parking spaces. Many of the facilities in the marina do not currently meet accessibility standards under the Architectural Barriers Act, limiting access in the area by people with disabilities.

As noted previously, though no material expansion of commercial services has occurred, or increases in capacity for overnight accommodations made, increases in day use visitation continue to increase the need for concessioner services. The current concessioner employee housing of about 930 beds is not adequate to support the current number of employees and does not support the increased number of employees needed to support the increasing day use visitation at the marina, food and beverage services, retail, gas stations, and other concession-operated day use areas in the park.

## **Environmental Consequences**

### *Alternative A – Issue Prospectus and New Concession Contract without Improvements to Fire Protection, Employee Housing, Visitor Amenities, and Accessibility (No Action)*

If additional fire protection measures are not implemented, the potential exists that occupancy at Jackson Lake Lodge and other noncompliant buildings may need to be reduced, resulting in a reduction in the number of guest rooms available. The reduction in number of rooms is not known at this time; however, if all 37 rooms in the main lodge that currently have insufficient fire protection were unavailable, this would represent about 10 percent of the 385 rooms at Jackson Lake Lodge when the surrounding cottages are included. During peak visitation, Jackson Lake Lodge is often at 90 percent occupancy. This loss of rooms would be a loss of approximately 11,000 visitor night stays, assuming an average of two people per room per night during the 5-month summer season. This loss of capacity would adversely affect those visitors who would otherwise reserve these rooms at the lodge, and it would be difficult for them to find similar lodging nearby during the busy summer season.

Current shortfalls of employee housing would continue to result in the inability of the concessioner to provide appropriate staffing for current visitor services as noted in the Affected Environment section.

Existing food and beverage services at Jackson Lake Lodge would continue as described in the Affected Environment section. There would be no changes in the number of sites with electric hookups at Colter Bay Campground; therefore, campers who desire electric hookups may not be able to find them and may need to rely on generators for electricity, potentially disturbing other campers due to the generator noise. The Colter Bay Marina would continue to provide limited access to people with disabilities.

Overall, while Alternative A would result in adverse impacts on visitor use and experience as described above, these adverse conditions would not prevent most visitors from enjoying their park experience and would not decrease the number of people visiting the park.

**Cumulative Effects** – Past, present, and reasonably foreseeable future actions that have impacted or would impact visitor use and experience include past and future improvements to telecommunications and cellular service within several park developed areas; routine maintenance of trails, facilities, and roads; existing or proposed trail and road improvements near Jenny Lake and Gros Ventre Campground; and the past and improvements to visitor facilities including, Jenny Lake, Signal Mountain Lodge and Campground, Colter Bay, and Flagg Ranch. These projects have resulted in, or would result in, long-term beneficial impacts on visitor use and experience by repairing and rehabilitating park infrastructure and facilities to improve visitor use and experience and improving communications infrastructure. Alternative A would result in adverse effects on visitor use and experience, as described above. When the effects of Alternative A are combined with other past, present, and reasonably foreseeable future impacts, the total cumulative impacts on visitor use and experience would continue to be beneficial, with a moderate adverse contribution from Alternative A.

*Alternative B – Issue Prospectus and New Concession Contract with Improvements to Fire Protection, Employee Housing, Visitor Amenities, and Accessibility*

As described under Human Health and Safety, the fire protection enhancements at Jackson Lake Lodge, Jenny Lake Lodge, and the Colter Bay grocery and laundry area would improve visitor safety by reducing risk of injury or death from fire by improving egress, notification, or suppression, if a fire were to occur. Overall, the fire protection enhancements would benefit visitor use and experience after construction is complete by ensuring that the existing rooms remain available to visitors at the Jackson Lake Lodge.

Reconfiguration of the Blue Heron Lounge kitchen at Jackson Lake Lodge would result in long-term beneficial effects on visitor use and experience. Reconfiguring the kitchen would allow the kitchen to remain open during poor weather. Reconfiguration of the kitchen would take about 4 months and would occur during the off-season, with construction beginning in mid-October once Jackson Lake Lodge is closed for the season; therefore, no visitors would be impacted. Reconfiguration of the kitchen would improve the capacity and efficiency of the Blue Heron Lounge, improving the overall visitor experience at Jackson Lake Lodge. Relocating the existing outdoor food preparation and grill area would also free up space on the patio that could be used by visitors.

Expansion of the electrical hookups at Colter Bay Campground would help meet existing visitor demand for additional electrical hookups. Installation of the electrical line at Colter Bay Campground could require road closures or restrictions, and partial shutdowns of the campground (e.g., one loop at a time), eliminating camping at up to 35 sites at a time during the shoulder visitor seasons (May to June or September to October). Because this work would occur in the shoulder seasons, visitors are expected to

be able to camp elsewhere in the campground, and visitor displacement would be minimal. Overall, expansion of electrical service to almost a third of the existing RV sites in Colter Bay Campground would result in long-term beneficial impacts on visitor use and experience.

In addition to construction disruptions, visitor use of Colter Bay Marina and the parking lot may be temporarily affected during construction; full closure of the marina is not expected. Construction may also require foot traffic in the marina area to be temporarily rerouted. Impacts on visitors would be limited because work would occur in the shoulder seasons (May to June or September to October). Additional mitigation measures would include advertising any partial closures to the public in advance, as described in Appendix A. After construction, visitors to Colter Bay Marina would have improved accessibility to existing marina and Elk Island amenities. Overall, the accessibility and facilities improvements to Colter Bay Marina and Elk Island would result in long-term beneficial impacts on visitor use and experience. Improvements to Colter Bay Marina also address recommendations found in the park *Self-Evaluation and Transition Plan* (NPS 2019a).

Construction of the Jenny Lake Lodge employee housing addition, conversion of the Colter Bay employee North Dorm room, addition of employee RV sites at Colter Bay, and use of the proposed staging areas would not result in visitor use and experience impacts, other than slight increases in traffic and noise from construction vehicles during the period of construction, because these areas are not open to the public.

**Cumulative Effects** – Past, present, and reasonably foreseeable future actions and related impacts on visitor use and experience would be the same as described for Alternative A. When the effects of Alternative B are combined with other past, present, and reasonably foreseeable future impacts, the total cumulative impacts on visitor use and experience would continue to be beneficial, with a substantial beneficial contribution from Alternative B.

## CONSULTATION AND COORDINATION

The following American Indian tribes, agencies, and organizations were contacted and were invited to participate in the compliance process:

### American Indian Tribes

- Apache Tribe of Oklahoma
- Assiniboine and Sioux Tribe of the Fort Peck Reservation, Montana
- Assiniboine & Gros Ventre Tribes of the Fort Belknap Indian Community of the Fort Belknap Reservation of Montana
- Blackfeet Tribe of the Blackfeet Indian Reservation of Montana
- Burns Paiute Tribe
- Cheyenne and Arapaho Tribes, Oklahoma
- Coeur d'Alene Tribe
- Comanche Nation, Oklahoma
- Confederated Salish and Kootenai Tribes of the Flathead Reservation, Montana
- Confederated Tribes of the Colville Reservation
- Confederated Tribes and Bands of the Yakama Nation
- Confederated Tribes of the Umatilla Indian Reservation
- Crow Tribe of Montana
- Eastern Shoshone Tribe of the Wind River Reservation
- Kiowa Indian Tribe of Oklahoma
- Kootenai Tribe of Idaho
- Nez Perce Tribe of Idaho
- Northern Arapaho Tribe of the Wind River Reservation
- Northern Cheyenne Tribe of the Northern Cheyenne Indian Reservation
- Oglala Sioux Tribe
- Rosebud Sioux Tribe of the Rosebud Indian Reservation
- Shoshone – Bannock Tribes of the Fort Hall Reservation
- Standing Rock Sioux Tribe of North & South Dakota
- Yankton Sioux Tribe of South Dakota

U.S. Fish and Wildlife Service  
Wyoming State Historic Preservation Office

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## **APPENDICES**

## Appendix A: Mitigation and Best Management Practices

The mitigation measures –which include park Best Management Practices – were designed to minimize impacts and have been incorporated as integral elements of Alternative B. If additional site-specific requirements are identified as necessary during project activities, they will be implemented on a case-by-case basis to further reduce impacts on resources.

### Construction

- Hours of work may be determined on a site-specific basis dependent upon visitor use and/or sensitive wildlife habitat.
- The location of all potential utility lines in work areas shall be field located and marked prior to work to avoid impacts on existing utilities.
- Following construction, furnish the park GIS Office with utility location information, including a shapefile using coordinates NAD83 UTM 12N, company name, and type and number of lines.
- Control dust during construction by minimizing soil exposure, watering, and using other dust prevention methods.
- All project zones will be kept trash free at all times.
- To minimize the amount of ground disturbance, staging and stockpiling areas will be located in previously disturbed sites, away from visitor use areas to the extent possible. All staging and stockpiling areas shall be returned to preconstruction conditions following project completion. Parking of construction vehicles will be limited to these staging areas, existing roads, and previously disturbed areas.
- Identify and define construction zones with construction tape, snow fencing, or other material prior to any construction activity. Use the zone to confine activity to the minimum area required for construction. Construction activities, including material staging and storage, cannot occur beyond the construction zone fencing.
- A traffic control plan for use during construction as approved by the park will be developed and enforced to minimize disruption to visitors and park operations and to ensure the safety of the public, park employees, and residents.
- Contractors will coordinate with park staff to minimize disruption of normal park activities.
- Any construction-related closures will be advertised in advance through social media and the park's website.

### Night Sky

- The minimum required amount of new lighting would be considered, and selected fixtures would meet criteria identified in the park's lighting policy.
- Lighting in the project area would be evaluated to determine if it is necessary and that it meets the park lighting policy to protect the night sky.

### Cultural Resources

- If previously unknown archeological (human-modified) and/or paleontological (fossils) resources are discovered during construction, all work in the immediate vicinity (600 feet) of the discovery shall be halted until the resources are identified and documented and an appropriate mitigation strategy developed. Contact the park's Branch Chief of Cultural Resources.

- If human remains are discovered during construction, all work will cease and park law enforcement will be contacted immediately. If the remains are archeological in nature, the park's cultural resource branch will be contacted.
- All fire protection enhancements will adhere to the Secretary of the Interior's Standards for Historic Preservation to avoid adverse effects. Plans and designs for all fire protection modifications defined in this EA will need to be reviewed pursuant to Section 106 of the NHPA by appropriate NPS cultural resource staff and will undergo review by the Wyoming State Historic Preservation Office prior to the finalization of specifications.
- Modifications to the Blue Heron Lounge and conference area will be limited to non-public or non-contributing areas of the Jackson Lake Lodge NHL to avoid adverse effects. Plans and designs for these modifications will need to be reviewed pursuant to Section 106 of the NHPA by appropriate NPS cultural resource staff and will undergo review by the Wyoming State Historic Preservation Office prior to the finalization of specifications.
- The addition of new employee housing in historic districts will follow existing cultural landscape treatment documents and recommendations. At Jackson Lake Lodge, all new employee housing will be constructed in the existing cluster of non-contributing structures and will be compatible with the character of the district by following recommendations set forth in the CLR, including material type, landscape improvements, and massing. At Jenny Lake Lodge, the construction of three new cabins will employ communal facilities, utilize design styles that are in the rustic style, and apply natural, compatible landscaping. Renovation of the north dorm at Colter Bay and accessibility improvements at the Colter Bay marina will require additional review prior to construction. Plans and designs for these modifications will need to be reviewed pursuant to Section 106 of the NHPA by appropriate NPS cultural resource staff and will undergo review by the Wyoming State Historic Preservation Office prior to the finalization of specifications.
- Construction of the new warehouse in Colter Bay must remain in the non-contributing area as defined with appropriate vegetative screening.
- All vegetation modification, including tree removal, within listed or National Register of Historic Places-eligible cultural landscapes shall be reviewed and approved by the Section 106 specialists (as well as by wildlife and vegetation specialists) to ensure no project actions affect the property's cultural landscape.
- All work on or near historic buildings, structures, sites, landmarks, districts, and landscapes shall be conducted in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties in consultation with park cultural resource specialists.
- Inform all contractors and subcontractors of the penalties for illegally collecting artifacts or intentionally damaging archeological sites or historic properties.

## **Soils**

- Avoid rutting or excessive soil compaction caused by vehicles or equipment by restricting construction activities during saturated soil conditions or severe weather conditions to reduce potential damage to soils and vegetation. In the event of adverse weather conditions, the project leader will consult with the park resource management representative to ensure that ground conditions are acceptable for project activities.
- To minimize soil loss/erosion at the project site, erosion control Best Management Practices, including protection measures such as sediment traps, silt fences, erosion check screens/filters, and jute mesh, will be used, if necessary, to prevent soil loss.

- The primary goal for site restoration and erosion control is to avoid all erosion from the site. Erosion control will focus on any areas where surface disturbance exceeds 1 foot in width. The major treatments for these areas include:
  - Dust control
  - Soil roughening
  - Seeding
- Topsoil shall be salvaged at the beginning of all ground-disturbing activities by scraping the topsoil to the side prior to deeper digging. Topsoil refers to the uppermost layers of soil and includes fine particles, small roots, rocks, and cobbles. Topsoil is usually darker in color and is the layer in which the majority of roots grow and beneficial microorganisms exist – usually the top 2 to 6 inches. Conserving topsoil will minimize impacts on vegetation and help preserve valuable micro-organisms and the native seed bank.
- Store salvaged topsoil separately from other materials. Limit the height of topsoil stockpiles to 36 inches. Do not stockpile topsoil or subsoil within the drip lines of remaining trees. Excess soil will be stored only at approved locations.
- Replace topsoil and other excavated soils and rock in the proper order, cobble lowest, then subsoil, then topsoil. Use a trench box if one is needed to reduce disturbance. Spread topsoil as near to the original location as possible.
- During the final stages of project implementation, scarify and loosen compacted subsoils to a minimum depth of 12 inches prior to replacing the salvaged topsoil. Soil decompaction will be done with equipment that has ripping teeth, placed a maximum of 12 inches apart.
- Do not drive or operate equipment on newly replaced topsoil. Do not reenter the project site once revegetation/restoration work has been initiated and/or completed.

### **Vegetation**

- Plant surveys for rare and sensitive species are required prior to ground-disturbing activities and must be conducted during growing seasons when these species could be identified. If rare plants are identified in the project area, Science and Resources Management (SRM) Vegetation Branch staff will develop measures for avoidance or relocation of the plants.
- If mitigation of construction disturbance requires the planting of vegetation, native vegetation of local genetic stock from the area of the park in which the facility is located will be used, when possible. A monitoring and control plan will be in place to avoid the introduction or spread of any exotic vegetation.
- Seed mixes used for revegetation in roadside corridors will consist of native species and approved by SRM Vegetation Branch staff.
- Prior to project implementation, SRM Vegetation Branch staff will conduct invasive, nonnative plant surveys in the project area. Invasive weed control measures will be implemented to monitor and control invasive nonnative plants in accordance with the park's existing practices for developed areas.
- To reduce the threat of nonnative, invasive vegetation being introduced to the park, all imported material (e.g., sand, gravel, rock, and riprap) must be obtained from a park-approved or county weed district-approved source. If a new material source is requested, park vegetation staff will seek county-approved material source pits or perform a nonnative, invasive plant inspection.

- Material sources, including sand, gravel, rock, riprap, and mulch that is not attained from county- or park-approved weed-free material sources must be precooked (300 degrees) or washed to prevent spread of invasive weeds in the park.
- Use wooden mats for vehicle and equipment access to the site to limit damage to existing vegetation.
- For roadside brush removal activities, parts under 3 inches in diameter may be "lopped and scattered" into adjacent forested vegetation so that it is 6 inches or less deep measured immediately after treatment. If chipping, broadcast chips so that chip depth is less than 2 inches measured immediately after treatment.
- Preserve existing trees to the extent possible and, during trenching operations, avoid damaging the roots of nearby trees.
- All vehicles and equipment shall arrive at the job site in a condition free of mud, dirt, and plant material. A method such as pressure washing prior to transport will be needed to comply with this requirement. Prior to offloading of any equipment, inspection and verbal approval must be obtained from the park resource management representative or delegated representative. The spread of nonnative, invasive plant species in the park is a serious concern, and no equipment will be allowed to offload or remain within the park if dirt or other contaminants with the potential to harbor seeds or other plant material is apparent.

### **Visual Resources**

- New facilities will be constructed in a manner that is compatible with the character of surrounding structures or otherwise made unobtrusive.
- Finishes or colors that are shiny or reflective in sunlight are not allowed.
- Trees and other vegetation adjacent to new facilities must be protected from damage. Topographic cuts and fills must be minimized and justified. Park staff will identify appropriate mitigation measures for approved cuts or fills.
- Security or safety lighting will be downshielded to keep light within the site boundaries.

### **Fish and Wildlife**

- To prevent introduction of terrestrial or aquatic invasive species, all equipment, including rubber-tired land and tracked land vehicles, and construction and facility equipment must be thoroughly cleaned and inspected by park personnel before being operated in the park.
- Unless otherwise noted (i.e., elk rutting and near sage-grouse leks), limit routine construction activities to 30 minutes after sunrise to 30 minutes prior to sunset to avoid disturbance to wildlife.
- To protect special status species:
  - Inform staff about the potential for special status species in or near the area of the proposed activity. Work will cease if a special status species is discovered in the project area until park staff reevaluates the project. Protective measures, including potential modification of the work or the work schedule, could be determined necessary.
  - In circumstances when it is deemed necessary to conduct activities near sites known to support Canada lynx or North American wolverine, the park biologist will be consulted to minimize impacts on the listed species (e.g., working quietly on-site and minimizing time in or near habitats en route to their work sites).
- All project activities must comply with the park's Superintendent's Compendium (2019 and as updated) regulations related to food storage and park-recommended Best Management Practices

for living and working in bear country. Bear “attractants” include food, drinks, garbage, cooking utensils, dirty/soiled pots/pans/plates, stoves, grills (charcoal or gas), empty or full coolers, storage containers with food or previously holding food (except approved bear-resistant canisters), beverage containers, pet food/bowls, and any odorous item that may attract a bear such as toiletries.

- At all times in all locations, including the backcountry, all staff (e.g., NPS, Volunteers-in-Parks (VIPs), and contractors) must ensure that all bear attractants are attended at all times. All unattended attractants must be stored securely inside a building, a bear-resistant food storage locker (if available), in a hard-sided vehicle with doors locked and windows closed, or in Interagency Grizzly Bear Committee-approved portable bear-resistant food storage canisters; or disposed of properly in a bear-resistant garbage receptacle. Backpacks and daypacks containing unsecured attractants (i.e., not in a canister) must not be left unattended.
- All personnel must attend a briefing on proper food/attractant storage and bear safety presented by a qualified member of the park's bear management team or their designee. Please contact the park's Bear Management Office at least 2 weeks prior to the desired start date to schedule a briefing.
- All human-bear conflicts must be reported to the Teton Interagency Dispatch Center immediately. All bear sightings must be reported to the park's Bear Management Office within 24 hours.
- Provide for proper storage and disposal of materials that may be toxic to bears. All potentially toxic attractants, including petroleum products, must be stored or disposed of in such a way that they are not available to bears.
- Construction debris must be separated from human food garbage and disposed of in dumpsters that can be closed at night. No open dumpsters are allowed. A request for an exception to the open dumpster stipulation, however, can be made to the project manager, who will consult with the park's Bear Management Office to determine if such use will be authorized. The use of open dumpsters will only be considered if the following conditions can be met: the open dumpster must be stored behind a locked fence out of view and inaccessible to the public, will be labeled construction debris only, and be inspected daily to ensure that no human food garbage is in the dumpster.
- For all projects occurring within the Grizzly Bear Primary Conservation Area, coordinate with the Bear Management Office to ensure that all project activities comply with habitat standards in the Final Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Area (USFWS 2016, <http://igbconline.org/yellowstone-subcommittee/>) and, to the extent practicable, that projects occurring in occupied grizzly bear habitat outside of the primary conservation area adhere to the spirit of standards in the final conservation strategy (USFWS 2016).
  - Minimize human interaction and potential grizzly bear mortality by continuing the park's hazing strategies to prevent grizzly bears from becoming habituated to human residences.
  - Manage building construction and other activities in coordination with park science and resources staff to minimize noise and visual disturbances and facilitate safe movement through habitat by grizzly bears.
- All project activities will adhere to all conservation measures outlined in the Lynx Conservation Assessment and Strategy (USFWS revised 2013).
- All project activities will comply with the Superintendent's Compendium (2019 and as updated) closures implemented around wolf den/rendezvous sites. Should a den or rendezvous site not

previously known be found within 1 mile of the proposed activity, a seasonal area closure will be implemented as needed, typically between April 15 and August 15.

- Prohibit construction activities before 8 a.m. and after 6 p.m. during the elk rutting and migration period (typically from September 1 to December 1, or as recommended by the park biologists).
- Avoid construction, maintenance, or other disturbing activities in crucial ungulate winter ranges (December 15 to April 15) and in identified ungulate parturition ranges (May 15 to June 30).
- Fencing (including temporary fencing for construction projects and permanent fencing) used in projects will comply with wildlife-friendly fencing standards. Consult with the SRM Fish and Wildlife Branch ungulate biologist for assistance with specifications and appropriate design.
- Care will be taken to not disturb any wildlife species (amphibians, reptiles, migratory birds, mammals, raptors, or bats) found nesting, hibernating, estivating (in an inactive dormant state during hot, dry periods), or otherwise living in, or immediately nearby, work sites. For example, areas will be avoided and buffers will be established around nests and dens until young fledge or dens are no longer occupied.
- Before commencement of any activities that involve removal or manipulation of vegetation, including large trees, grasses, and shrubs, during the breeding season, conduct a survey for nesting birds. Surveys must be conducted by qualified personnel before tree removal or ground-disturbing activities begin. Work must be completed within 2 weeks of the nesting bird survey to ensure that birds do not nest in the project area before work begins. If this is not possible, another survey must be scheduled with park biologists.
- Eagles are specifically protected under the Bald and Golden Eagle Protection Act of 1940 (16 U.S.C. 668-668c) and the Migratory Bird Treaty Act. Project activities must not lead to the take of bald or golden eagles. The Bald and Golden Eagle Protection Act defines “take” to include disturbing birds.
- Implement seasonal closures (typically February 1 to August 15) of ½ mile (2018 Superintendent's Compendium) around occupied bald eagle nests and prohibit work on or occupancy of area within the closures while they are in effect.
- It is the responsibility of park staff to report any eagle activity in the vicinity of proposed activities to park biologists in a timely way so that they may assess whether additional mitigation measures are needed to comply with the Bald and Golden Eagle Protection Act and Migratory Bird Treaty Act.
- All project activities must comply with the Superintendent's Compendium (2016 and as updated) closure regulations for sage-grouse leks and, to the extent practicable, all project activities occurring within occupied sage-grouse habitat within the core sage-grouse area will apply the management direction and conservation measures outlined in the Wyoming Governor's Executive Order 2015-4 and the Upper Snake River Basin Sage-Grouse Conservation Plan (State of Wyoming 2014).