



## **TOWER-ROOSEVELT COMPREHENSIVE PLAN FINDING OF NO SIGNIFICANT IMPACT**

In 1872 Yellowstone National Park's 2.2 million acres were "set apart as a public park or pleasuring-ground for the benefit and enjoyment of the people" and to "provide for the preservation, from injury or spoliation, of all timber, mineral deposits, natural curiosities, or wonders within said park, and their retention in their natural condition." The Tower-Roosevelt area is located in the northeast part of Yellowstone, 18 miles east of Mammoth Hot Springs, and includes the junction of the Grand Loop Road and the Northeast Entrance Road (Map 1). The Tower-Roosevelt development lies within an area known as the Northern Range, which covers more than 500 square miles of wildlife habitat in the Lamar and Yellowstone river basins, overlapping the boundary between Wyoming and Montana. The Tower-Roosevelt area contains geologic features, varied wildlife habitat, and historic districts that contribute to the distinct and significant character of the area and provide opportunities for recreation, education, and conservation.

As facilities age and visitation patterns change, there is a need to alter or improve visitor services, facilities (buildings, roads, and paved parking areas), and utilities while preserving the distinct and significant rustic western camp character and resources in the Tower-Roosevelt area. Changes discussed within this plan may include the addition, removal, replacement, or improvement of buildings, roads, parking areas, and utility systems. Yellowstone National Park has developed a comprehensive plan that protects park resources, values, and visitor experience in the Tower-Roosevelt area by defining boundaries, limits, and standards of where and how development can occur. The Plan defines a benchmark of desired future conditions for resources and visitor experience that is based on the Tower-Roosevelt area's significance and fundamental resources and values. The plan sets *acceptable limits of change* to development that support these desired future conditions. These acceptable limits of change are specified through Planning Zones, Planning Prescriptions, and Design Standards. Finally, the plan proposes projects that help achieve the desired future conditions for resources and visitor experience while remaining within the scope of the acceptable limits of change for the Tower-Roosevelt area.

This document records 1) a Finding of No Significant Impact, as required by the National Environmental Policy Act of 1969 and 2) a determination of no impairment, as required by the NPS Organic Act of 1916.

## **OBJECTIVES**

The objectives of the Tower-Roosevelt Comprehensive Plan are to:

- Ensure that the desired conditions for natural, cultural, and visual resources and visitor experience are defined and achieved.
- Preserve, protect, and improve park natural, cultural, and visual resources and visitor experiences and achieve desired conditions by guiding the location, use, size, and appearance of visitor services, facilities, and utilities.
- Provide resource information in a single document to better assess possible cumulative impacts for proposed and future projects.
- Ensure future use of sustainable designs, methods, building practices, and technologies to the extent possible.
- Identify opportunities to reduce buildings, roads, trails, utility systems, and other facilities that do not support the desired conditions; reinvesting resources to improve the condition of the park's most important assets.
- Guide decisions to provide high quality visitor services; concentrating efforts on core services at core locations, during peak visitation periods, while maintaining essential services throughout the Tower-Roosevelt area.
- Develop a consistent and timely process to formally evaluate project proposals based on acceptable limits of change defined in the Tower-Roosevelt Comprehensive Plan/Environmental Assessment (TRCP/EA).

## **SELECTED ACTION**

### **Summary**

The TRCP/EA did not identify a Preferred Alternative; instead, the Selected Action was developed in response to public and internal scoping and comments, and in consideration of the desired future conditions for resources and visitor experiences. **This FONSI adopts Alternative B as the Selected Action, with modifications that incorporate elements from Alternative C intended to better meet the desired conditions for resources and visitor experiences set forth for the Tower-Roosevelt area.** The resulting Tower-Roosevelt Comprehensive Plan preserves the area's small-scale, rustic, historic character and traditional western activities. The Plan also protects the area's distinct and significant natural, cultural, and visual resources.

This FONSI adopts the planning process, desired conditions, planning components, project application form, additional compliance responsibilities and procedures, constraints, guidelines and standards, and mitigating measures established in the TRCP/EA and the Tower-Roosevelt Comprehensive Plan (TRCP). It also adopts the project list from Alternative B, with modifications (outlined in the location summaries below). Any new projects not discussed or analyzed in this FONSI will require compliance. The following

describes the Selected Action. [*Note: the specific changes to the text of the TRCP/EA are listed in the TRCP and the Errata Sheet attached to this FONSI.*]

The Selected Action delineates allowable net gains and reductions in development footprint in the Tower-Roosevelt area. Sometimes known as the “built environment,” development footprint is the square footage of buildings (at ground level), roads, and paved parking. A “net gain or reduction” in footprint is the square footage, relative to current conditions, that a development may expand or contract.

The Selected Action will accommodate a net increase of up to 11,025 square feet in development footprint for buildings (a 10% gain from the current 115,000 square feet) distributed throughout specific locations within the Tower-Roosevelt area. This gain could be offset by removal of up to 5,000 square feet of the Tower Store. The overall net increase in development footprint for paved parking (currently 142,332 square feet) is 33,000 square feet (a 23% net gain). This increase to the development footprint is dispersed throughout the Tower-Roosevelt area in eight (8) planning locations where facilities are clustered: Roosevelt Lodge, Roosevelt Corrals, Tower Ranger Station, Tower Administrative, Tower Junction, Tower Fall Trailhead, Tower Fall Campground, and Yancey’s Hole locations.

**Roosevelt Lodge Location:** The Roosevelt Lodge will continue to provide rustic, ranch-style lodging and dining. This FONSI modifies Alternative B at this location in response to public comment and to best meet desired future conditions (see Section 2.2 and Figures 2a-2b in the TRCP for details). The Selected Action adopts a reduced development footprint in this zone to lessen impacts to the visitor experience and historic resources in the Roosevelt Lodge location. Originally, Alternative B allowed for up to 7,200 square feet net gain of building and 10,000 square feet of additional paved parking; the modified development footprint is downsized to a maximum net gain for buildings of 1,300 square feet (a 2% net gain) and can accommodate additional cabins, employee restrooms, and a shower house within the Buildable Historic Zone. The net gain in development footprint for parking is downsized to 2,000 square feet (a 6% net gain), which allows for parking redesign to lessen impacts to historic views and congestion near the Roosevelt Lodge. The modifications to Alternative B in the development footprint support the historic character and visitor experience of the location and reduce the risk of wildland fire and congestion. Fewer structures (than what were originally planned in Alternative B) will result in less impact to park operations, including fire protection and infrastructure for parking, water, and sewage systems. Design Standards are adopted as described under Alternative B, with a modification to reflect fire mitigation measures.

This FONSI adopts Planning Zone sizes and types and primary functions from Alternative B without modification for the Roosevelt Lodge location.

**Roosevelt Corrals Location:** The Roosevelt Corrals location will continue to offer visitor opportunities associated with traditional horse use. This FONSI adopts all planning components described in Alternative B with the minor modification in Design Standards to reflect fire mitigation measures and the option of either a fabric or a wooden roof for the

proposed shade shelter. Planning Zones, development footprint, Planning Prescriptions, projects, and Design Standards for the Roosevelt Corrals are shown in Section 2.3 and Figures 3a-3b of the TRCP.

**Tower Ranger Station Location:** The Tower Ranger Station location will continue to provide NPS visitor and administrative services. This FONSI modifies Alternative B at this location to best meet desired future conditions for resources and the visitor experience. The Selected Action adopts the Planning Zone, development footprint, and projects from Alternative C (illustrated in Section 2.4 and Figures 4a-4b in the TRCP) to support the historic character and visitor experience in this location. The maximum net gain in development footprint for buildings is 500 square feet in the Buildable Historic Zone (a 13% net gain), which results in less impact to park operations, including infrastructure such as parking, water, and sewage systems, and less impact to water resources, as the location has a high water table. The expansion of the existing backcountry/operational office is the only identified project. Design Standards are adopted as described under Alternative B with a modification to reflect fire mitigation measures.

This FONSI adopts the Planning Zone types and primary functions from Alternative B without modification for the Tower Ranger Station location.

**Tower Administrative Location:** The Tower Administrative location will continue as the base for NPS administrative and maintenance activities. This FONSI adopts Alternative B with minor changes to better meet the area's desired future conditions for resources and visitor experiences (illustrated in Section 2.5 and Figures 5a-5b in the TRCP). Design Standards are adopted as described under Alternative B with modifications to reflect fire mitigation measures and to recommend use of the roof spaces as a part of the second story (rather than having two full stories plus additional vertical space to form the roof). Projects are adopted as described under Alternative B, with the modification that the "emergency services building" name has been changed to an "operations services building."

This FONSI adopts the Planning Zones, development footprint, and primary functions described in Alternative B without modification for the Tower Administrative location.

**Tower Junction Location:** The Tower Junction location will continue to provide visitor facilities and administrative support for concession visitor functions. Additional visitor services, facilities, and utilities can be accommodated within this location. This FONSI modifies Alternative B at this location in response to public comment. The Selected Action adopts the Planning Zone and development footprint (illustrated in Section 2.6 and Figures 6a-6b in the TRCP) from Alternative C, which support the historic character and visitor experience of the entrance from this location to the Roosevelt Lodge and lessen the impacts to visual resources from the Historic Grand Loop Road and the adjacent valley. The modifications adopted by the Selected Action reduce impacts to cultural resources (archeology), soils, and wetlands and require less impact to park operations, including additional infrastructure such as parking, water, and sewage systems. The maximum net gain in development footprint for buildings is 2,000 square feet (a 59% net gain). This will accommodate a commercial services building, additional public restrooms, a visitor contact station, and removal of the service station

building, while retaining pay-at-the-pump fuel service. There will be no change to the Grand Loop Road. This FONSI modifies Alternative B to allow the maximum net gain in development footprint for paved parking of 15,000 square feet (a 46% net gain) that accommodates up to 60 car and 4 oversized vehicle spaces. Design Standards are adopted as described under Alternative B, with a modification to reflect fire mitigation measures. The function and size of any future proposed facility will be presented and the effects analyzed in a future environmental assessment that tiers from the TRCP/EA.

This FONSI adopts the Planning Zone types and primary functions of Alternative B without modifications for the Tower Junction location.

**Tower Fall Trailhead Location:** The Tower Fall Trailhead location will continue to provide visitor services and facilities. This FONSI modifies Alternative B at this location in response to public comment. The Selected Action adopts the Planning Zone and development footprint (illustrated in Section 2.7 and Figures 7a-7b in the TRCP) from Alternative C to support visitor experience and increase visitor safety. Alternative B specified that at least 50%, and potentially 100%, of the general store be removed. The Selected Action allows for a maximum net *reduction* in building development footprint of up to 5,000 square feet (up to one-half) rather than complete removal of the general store. The facilities at this location provide visitor services for the adjacent campground, hikers using the Tower Fall Trail, and visitors traveling the Dunraven Pass Road. The Selected Action reduces the impacts to park operations, specifically the sewage system, by potentially reducing the development footprint for buildings in this location. The Selected Action adopts an increase in development footprint for paved parking, which will improve visitor traffic safety in this congested location. The proposed net gain in development footprint for paved parking is up to 16,000 square feet (a net gain of 37%). Design Standards are adopted as described under Alternative B, with a modification to reflect fire mitigation measures.

This FONSI adopts the primary functions and projects of Alternative B without modifications for the Tower Fall Trailhead location.

**Tower Fall Campground Location:** The Tower Fall Campground location will continue to offer a campground for visitors and to provide concessioner housing in the adjacent employee housing area. This FONSI modifies Alternative B at this location to best meet desired future conditions for resources and the visitor experience. The Selected Action adopts the Planning Zone and development footprint (illustrated in Section 2.8 and Figures 8a-8b in the TRCP) from Alternative C to support the character and visitor experience of the campground and to lessen the impacts to park operations, specifically the area's parking, water, and sewage systems. The maximum net gain in development footprint for buildings is 200 square feet (a net gain of 2%), as opposed to the 1,300 square feet originally proposed in Alternative B. The Selected Action adopts the project from Alternative C, an additional vault toilet, which will further support visitor experience in the campground without impacting resources. The sewer system capacity is a limiting factor within this location; no additional loads on the sewer will be accommodated. Design Standards are adopted as described under Alternative B with a modification to reflect fire mitigation measures.

**Yancey's Hole Location:** The western style cookout will continue at this current location. This FONSI modifies Alternative B at this location to best meet desired future conditions for resources and the visitor experience. The Selected Action adopts a smaller Planning Zone while retaining the proposed development footprint from Alternative B (illustrated in Section 2.9 and Figures 9a-9b in the TRCP) to support the site's character and the visitor experience, and to reduce impacts to resources. Impacts to resources are further minimized by consolidating the development footprint in the existing disturbed areas. The maximum net gain in development footprint for buildings is 125 square feet (a 4% net gain), which can accommodate the construction of a vault toilet, modification or replacement of the serving shelter, and replacement of the dining shelter. The serving and dining shelters will remain in their current locations, allowing for a slightly larger footprint to accommodate a new foundation for the serving shelter. No net gain in development footprint is accommodated within the Buildable Natural Zone. Design Standards are adopted as described under Alternative B with modifications to reflect fire mitigation measures and to limit the existing structures to replacement within the existing location. This FONSI adopts only the excavation outlined in the Selected Action, connected to the footprint for the vault toilet and expansion of the foundation of the serving shelter.

This FONSI adopts the projects and primary functions of Alternative B with no modifications in the location.

### **General Planning Prescriptions for the Selected Action**

Several prescriptions are common to all or most planning locations. In all locations, there will be no net gain in unpaved parking. Unless otherwise specified, there will be no gain in development footprint for Buildable Circulation Zones, and the primary function "access road" will be assigned to these zones. With the exception of the Yancey's Hole location, there is an undetermined development footprint for the primary functions, "trails and underground utilities" in all Buildable Natural Zones with impacts no greater than minor. Impacts that are more than minor will be subject to additional mitigation. In Buildable Development Zones, if buildings or paved parking-areas are removed, they can be replaced, following the Design Standards for each location. This also applies to Buildable Historic Zones; however, removal and replacement must accord with Section 106 of the National Historic Preservation Act. In all locations, Design Standards are adopted as described under Alternative B, with modifications to reflect fire mitigation.

### **At-a-Glance Comparison of Development Footprint and Projects for Selected Action**

The Selected Action adopts Alternative B with modifications for Projects and development footprints that are proposed for each of the eight (8) locations described in the table below. The square footage for each location is the amount of development footprint (the square footage of buildings and parking at ground level) that can be added to the existing footprint. The current development footprint can be replaced if it is the same square footage without counting toward the allowance of the additional footprint. If a current building or paved parking area is replaced by a building or paved parking area that is larger than previously existed, the extra footage will count toward the allowance. (Table found on following page.)

*Note: A "net gain or reduction" in footprint is the square footage, relative to current conditions, that a development may expand or contract*

## Selected Action

Location	Development Footprint and Projects
<b>Roosevelt Lodge</b>	<p><b>Utilize planning zone from Alternative B.</b> Not to exceed 1,300 square feet net gain in additional building footprint and 2,000 square feet net gain in additional parking footprint. Projects:</p> <ul style="list-style-type: none"> <li>• Construct employee restrooms and shower house</li> <li>• Improve Roosevelt Lodge parking</li> <li>• Construct cabins</li> </ul>
<b>Roosevelt Corrals</b>	<p><b>Utilize planning zone from Alternative B.</b> Not to exceed 2,000 square feet net gain in additional building footprint and no net gain in parking footprint. Projects:</p> <ul style="list-style-type: none"> <li>• Replace or expand saddle barn</li> <li>• Construct shade shelter</li> <li>• Replace or expand hay barn</li> </ul>
<b>Tower Ranger Station</b>	<p><b>Utilize planning zone from Alternative C.</b> Not to exceed 500 square feet net gain in additional building footprint and no net gain in parking footprint. Projects:</p> <ul style="list-style-type: none"> <li>• Expand existing backcountry operations office</li> </ul>
<b>Tower Administrative</b>	<p><b>Utilize planning zone from Alternative B.</b> Not to exceed 5,400 square feet net gain in additional building footprint and no net gain in parking footprint. Projects:</p> <ul style="list-style-type: none"> <li>• Construct employee housing</li> <li>• Construct operational services building</li> </ul>
<b>Tower Junction</b>	<p><b>Utilize planning zone from Alternative C.</b> Not to exceed 2,000 square feet net gain in additional building footprint and 15,000 square feet net gain in additional parking footprint. Projects:</p> <ul style="list-style-type: none"> <li>• Construct commercial service building</li> <li>• Remove service station building—fuel service only</li> <li>• Construct public restrooms</li> <li>• Construct visitor contact station</li> <li>• Improve parking for 60 auto and 4 oversized vehicle spaces</li> <li>• No change to Grand Loop Road</li> </ul>
<b>Tower Fall Trailhead</b>	<p><b>Utilize planning zone from Alternative C.</b> Existing building footprint or net reduction in existing building footprint to 4,999 square feet, and 16,000 square feet net gain in additional parking. Projects:</p> <ul style="list-style-type: none"> <li>• Reduce the size of the Tower Fall General Store</li> <li>• Improve the Tower-Fall parking</li> </ul>
<b>Tower Fall Camp-ground</b>	<p><b>Utilize planning zone from Alternative C.</b> Not to exceed 200 square feet net gain in additional building footprint and no net gain in parking footprint. Projects:</p> <ul style="list-style-type: none"> <li>• Construct vault toilet in campground</li> </ul>
<b>Yancey's Hole</b>	<p><b>Utilize reduced planning zone from Alternative B.</b> Not to exceed 125 square feet net gain in additional buildings footprint. Projects:</p> <ul style="list-style-type: none"> <li>• Replace dining shelter</li> <li>• Modify serving shelter</li> <li>• Construct vault toilet</li> </ul>

*Note: This Plan/EA provides for the replacement of existing development footprint in addition to new development footprint. Changes to historic properties require compliance with Section 106 of the National Historic Preservation Act.*



## MITIGATING MEASURES

The Tower-Roosevelt Comprehensive Plan identifies natural, cultural, and visual resources, especially those protected by law or policy and intended to be avoided completely or mitigated if affected. The Plan also identifies desired visitor experience. Alternative B uses the three planning components (Buildable Planning Zones, Planning Prescriptions, and Design Standards described in Figure 1 of the Plan) to keep impacts to natural, cultural, and visual resources and visitor experience at a minimum. Therefore, the planning components themselves are considered mitigation measures. These three planning components are described in detail in Section 1.7.5 of the Tower-Roosevelt Comprehensive Plan.

All projects that have the potential to affect wetlands, waters of the U.S., rare plants, and/or cultural resources must go through additional steps to comply with applicable laws and policies, even if they are within the scope of this plan. This is identified in the Project Evaluation Process.

The Tower-Roosevelt Comprehensive Plan provides further mitigation for impacts that could potentially result during project implementation. The following mitigation measures are common to all planning locations in the TRCP.

### **To preserve park natural, cultural, and visual resources:**

- Construction workers and supervisors will be informed about relevant park regulations and the importance of taking appropriate measures to minimize impacts to park resources.
- Construction workers and supervisors will be informed about special status species. If one of these species is discovered in a project area, contract provisions will require cessation of construction activities until park staff can assess the situation. The contract will be modified if necessary to protect the species.
- Construction activities will not be permitted in locations where archeological or paleontological resources are known to be present without the presence of an archeological monitor. If such resources are discovered during construction, the work will cease until park staff have consulted with the State Historic Preservation Officer and the Advisory Council on Historic Preservation (§36 CFR 800.13, *Post-review Discoveries*). In the unlikely event that human remains are discovered, provisions outlined in the Native American Graves Protection and Repatriation Act (1990) will be followed.
- Contractors and subcontractors will be informed of the penalties for illegally collecting artifacts or intentionally damaging paleontological materials, archeological sites, or historic properties.

- The park vegetation guidelines including topsoil salvaging will be implemented in construction projects.
- All wetland and floodplains will be avoided or permitted and mitigated relevant to park and other agency requirements.

**To minimize ground disturbance:**

- Staging and stockpiling areas will be located in previously disturbed sites, away from visitor use areas to the extent possible, and returned to pre-construction conditions following construction.
- The minimum area needed for an approved construction activity will be delineated by construction tape, snow fencing, or similar material. All protection measures will be clearly stated in the construction specifications and workers will be instructed to avoid conducting activities beyond the identified construction zone.
- Because disturbed soils are susceptible to erosion until revegetation takes place, standard erosion control measures such as the use of silt fences will be used to minimize the possibility of soil erosion or impacts from soil erosion.

**To minimize impacts during construction:**

- Construction zones will be identified and fenced prior to any construction activity. If previously undiscovered archeological resources are discovered during construction, work in the immediate vicinity of the discovery will cease until the resource can be identified and documented. An appropriate mitigation strategy developed in consultation with the Wyoming State Historic Preservation Office will be developed. Additional compliance beyond the scope of the EA may be necessary.
- If necessary, dust generated by construction activity will be controlled by spraying water from an approved source on the site.
- Contractors will regularly monitor and check construction equipment to identify and repair any petrochemical leaks.
- To reduce noise and emissions, construction equipment will not be permitted to idle for extended periods and construction workers will not be permitted to broadcast portable audio devices through speakers. The use of jake brakes will be minimized when transporting materials in large trucks.
- The timing of construction activities may be altered to minimize impacts on park visitors.

## **To restore disturbed areas**

- All disturbed areas will be restored shortly after construction activities are completed.
- Revegetation and recontouring will be designed to minimize visual intrusions while restoring as nearly as possible pre-construction conditions.
- Revegetation efforts will strive to restore the natural spacing, abundance, and diversity of the native plant community.
- Weed control methods will be implemented to prevent the introduction of non-native species.
- Strip and stockpile topsoil before construction and replace along the disturbed trench-line after finishing grading. Restore grade to match surrounding landscape; match natural surface drainage patterns and undulations in topography.
- There should be the appearance of a natural landscape, with no above-ground features other than small utility boxes, hydrant, signs, trails, and boardwalks. Preserve natural views in the landscape.

## **ALTERNATIVES CONSIDERED**

The Tower-Roosevelt Comprehensive Plan/Environmental Assessment (TRCP/EA) evaluated three alternatives for the proposed comprehensive plan. Alternative A: *No Action*, Alternative B: *Medium Level of Change*, and Alternative C: *Low Level of Change*. The “no action” (i.e. no plan) alternative evaluated the environmental impacts that could result from case-by-case project consideration. Alternatives B and C, the action alternatives, utilized different levels of acceptable limits of change, which consist of three distinct components used in combination: Buildable Planning Zones (location and extent of change), Planning Prescriptions (primary function and maximum size of change), and Design Standards (characteristics of change). The action alternatives differed in the locations and sizes of the Buildable Planning Zones and the sizes of the development footprints, and therefore some of the future projects that were considered.

To streamline the planning process, all alternatives were divided into eight planning areas within the Tower-Roosevelt area where the features and facilities are clustered: (1) Roosevelt Lodge, (2) Roosevelt Corrals, (3) Tower Ranger Station, (4) Tower Administrative Services, (5) Tower Junction, (6) Tower Fall Trailhead, (7) Tower Fall Campground, and (8) Yancey’s Hole.

**Alternative A: No Action** retained the status quo of evaluating projects on a case-by-case basis rather than using a comprehensive plan. Alternative A, illustrated in Maps 1, 2, and 3 in the TRCP/EA, did not designate any Planning Zones, and did not establish Planning Prescriptions, development footprints, or Design Standards.

**Alternative B: Medium Level of Change** established Buildable Planning Zones as shown in Maps 4, 5, and 6 of the TRCP/EA and accommodated the largest possible net change to the development footprint (21,225 square feet in building footprint and 43,000 square feet in paved parking footprint). Footprint details for each of the eight planning locations were also shown in Maps 4, 5, and 6. The Planning Prescriptions of Alternative B provided for the most operational flexibility and best accommodated improvements to health and safety. Environmental impacts of this alternative did not exceed short- and long-term moderate adverse impacts.

**Alternative C: Low Level of Change** established Buildable Planning Zones as shown in Maps 7, 8, and 9 of the TRCP/EA and accommodated the smallest net change to the development footprint (8,050 square feet in building footprint and 31,000 square feet in paved parking footprint). Footprint details for each of the eight planning locations were also shown in Maps 7, 8, and 9. The Planning Prescriptions for Alternative C best protected and enhanced visual resources and the historic character of the area. Environmental impacts of this alternative did not exceed short- and long-term minor adverse impacts.

**Environmentally Preferred Alternative:** Although both action alternatives met the NEPA requirements, Alternative C, Low Level of Change, is the environmentally preferred alternative. The environmentally preferred alternative is the alternative that will promote the national environmental policy as expressed by §101 of the National Environmental Policy Act. This includes alternatives that:

- (1) fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
- (2) assure for all generations safe, healthful, productive, and esthetically and culturally pleasing surroundings;
- (3) attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
- (4) preserve important historic, cultural, and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;
- (5) achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities; and
- (6) enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

Alternative B, *Medium Level of Change*, provided the most opportunities for visitors through larger development footprints, larger Buildable Planning Zones, and more projects, without unacceptable impacts to resources and visitor experience. Therefore, it met the first three criteria above. It met the last three criteria by providing the widest range of

beneficial uses, addressing sustainability in the Design Standards and also by encouraging the removal of buildings and pavement when possible. However, since its proposed 19% increase in building footprint and 29% increase in overall paved parking footprint are higher than in Alternative C, it was not selected as the environmentally preferred alternative.

Alternative C, *Low Level of Change*, was the environmentally preferred alternative because it best addressed the six criteria above. Alternative C provided for the construction of projects through smaller Buildable Planning Zones and development footprint without unacceptable impacts to resources and visitor experience. It did this through a 7% increase in building footprint and a 22% increase in paved parking footprint, which was less than what was proposed in Alternative B. Therefore it best met four out of six criteria above. Alternative C had less impact on health and human safety, visual quality, visitor use and experience, and park operations than Alternative B. It met the last two criteria by addressing sustainability in the Design Standards and also by encouraging the removal of buildings and pavement when possible.

Alternative C was not selected as the Selected Action because it accommodated very minor changes to development across the entire Tower-Roosevelt area, which did not best achieve some of the desired future resource conditions and visitor experiences. Alternative C also did not optimally accommodate operational infrastructure and visitor services improvement to adequately and safely support visitors and the existing visitor experience within this portion of the park.

The Selected Action, Alternative B with modifications, will allow for limited changes within the planning area and improved visitor experience, while minimizing impacts on natural and cultural resources. After consideration of public comments throughout the scoping and planning process, careful review of potential resource and visitor impacts, and developing appropriate mitigation to protect resources, Alternative B, with modifications, best strikes a balance between the optimal range of use and enjoyment of the Tower-Roosevelt area without degradation of the environment or risk of health or safety.

## **WHY THE PREFERRED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT**

As defined in 40 CFR §1508.27, significance is determined by examining the following criteria:

***Impacts that may be both beneficial and adverse. A significant effect may exist even if the agency believes that on balance the effect will be beneficial.***

### ***Degree of effect on public health or safety***

The Selected Action will have short- and long-term minor adverse and minor beneficial impacts to public health and safety and to park operations by creating Planning Zones and development footprints that minimally expand development at the Tower Junction and

Roosevelt Lodge locations. For instance, wider turning radii at the Roosevelt Lodge (through slightly increased parking footprint) will allow emergency vehicles to maneuver through the development, providing more efficient emergency response. Providing mitigating measures for wildland fire in all locations in the Selected Action reduces the impacts to park operations and park visitors by reducing the threat of fire and enhances the ability of staff to protect resources.

While some short- and long-term, minor adverse impacts will occur due to increased traffic and congestion from increased possible development at Tower Junction, moderate beneficial impacts will result from consolidated, organized parking and crossings for pedestrian and horses, as well as shade and shelter for visitors at the corral. Public safety will also be enhanced from the accommodation of facilities such as an operational services building, which will help park personnel respond quickly to emergencies in the Tower-Roosevelt area due to closer proximity between employee housing and emergency vehicles, as well as providing a heated space for emergency vehicles that carry water and liquid medications that can freeze. Redesigned parking at the Tower Fall Store will enhance public safety as motorists merge with traffic on the Grand Loop Road. The plan also identifies areas where potential geologic hazards may occur, which enhances public safety.

***Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas***

There are three historic districts within the Tower-Roosevelt area: Grand Loop Road Historic District, Tower-Junction Ranger Station Historic District, and Roosevelt Lodge Historic District. There are cultural resources and wetlands within the planning area. Cultural and natural resource surveys are mapped in Appendix B of the TRCP. The Selected Action does not significantly impact historic, natural, or cultural resources. The planning components avoid or mitigate impacts and at the Tower Junction location, further environmental analysis will be provided for site-specific projects through a future environmental assessment that tiers from the TRCP/EA. There are no prime farmlands located within the park. The Snake River was designated as a wild and scenic river in 2009; however, it runs through the southern part of Yellowstone National Park and is not influenced by development in the Tower-Roosevelt area.

***Degree to which effects on the quality of the human environment are likely to be highly controversial***

Based on public comment, there is concern that additional development at the Tower Junction location is appropriate. Concern was expressed about losing the “Old West” character of the entrance to Roosevelt Lodge. In response, the Selected Action consolidates development away from the Roosevelt Lodge entrance, and clusters future possible development in the Planning Zone near the current Tower Service Station (see Fig. 6a-6b). When more site-specific information is available regarding the function, location, and size of any proposed commercial structure at Tower Junction, the public will be asked to participate through the environmental assessment (EA) process. A new EA would tier off of the existing TRCP/EA. Likewise, some public comments expressed concerns that

Yellowstone needs to keep the Tower Store as a place to provide concessions visitor services. The Selected Action responds to this need by keeping the store at its current location, with a possible downsize in the development footprint, and increasing parking nearby. In summary, the Selected Action adopts Alternative B with modifications, which were crafted to address concerns expressed through public comment and provides future opportunities for public comment at the Tower Junction location; therefore, the park concludes that it is unlikely that there will be any highly controversial effects.

***Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks***

The planning process utilizes an area-wide resource inventory and assessment and well-defined boundaries for Planning Zones; the impacts are limited in regard to development within those zones. Uncertainty is reduced by ensuring that any projects not included in the plan will be evaluated under the National Environmental Policy Act (NEPA). The Planning Prescriptions, Design Standards, and mitigating measures minimize impacts to resources for future development, therefore reducing risk.

***Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration***

The National Park Service has adopted comprehensive area plans for developed areas since the 1930s, when Thomas Vint and Daniel Hull created plans known as "General Development Plans," or "Site Plans." Later, the concept expanded to include larger areas and the plans evolved into "Development Concept Plans." In 1969, planners introduced the concept of Planning Zones based on resource inventory and analysis and planning prescriptions by application of planning layers. The third planning component, Design Standards, was first utilized in the 1930s, when the National Park Service developed Park and Recreation Structures documents.

Because there have been developed area plans in the past, and there are existing comprehensive plans with similar planning components in other parks, action for this project will not set precedent.

***Whether the action is related to other actions with individually insignificant but cumulatively significant impacts***

No major (significant) cumulative effects were identified in the EA.

***Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources***

The Roosevelt Lodge Historic District and Grand Loop Road Historic District are listed on the National Register of Historic Places. Tower Junction Ranger Station Historic District has been determined eligible for the National Register of Historic Places. Additional features and patterns that contribute to the Roosevelt Lodge and Tower Junction Ranger Station Historic Districts were determined eligible in July of 2008. On July 13, 2009, the Wyoming State Historic Preservation Office concurred with the environmentally preferred alternative for this action. The Selected Action addresses WYSHPO concerns with modifications to Alternative B

and the park will continue to consult with them on effects to historic properties on a project-by-project basis as described in the TRCP/EA. Impacts to archaeological resources will be long-term negligible to minor adverse impacts by the Selected Action which modifies Alternative B at the Tower Junction location. The downsized Planning Zone at this location avoids impacts to known archaeological resources. Impacts by the Selected Action will be negligible to minor for historic resources, if the Mission 66 Tower Fall General Store is retained or rehabilitated. Currently, Yellowstone staff are undertaking a park-wide assessment of all Mission 66 structures; the Mission 66 Tower Fall General Store may be reduced in size and the Service Station may be retained, rehabilitated or removed in the future in the Selected Action. If the Tower Service Station or the Tower Fall General Store is determined eligible for the National Register of Historic Places, mitigation prior to reduction or removal will be determined through consultation with the Wyoming State Historic Preservation Officer following Section 106 of the National Historic Preservation Act.

All projects that have the potential to affect cultural resources or are within or adjacent to cultural resources within the Tower-Roosevelt area still require cultural resource compliance and consultation if necessary.

***Degree to which the action may adversely affect an endangered or threatened species or its critical habitat***

The U.S. Fish and Wildlife Service concurred with the determination of “no effect on threatened or endangered species” in their letter dated July 9, 2009.

***Whether the action threatens a violation of Federal, state, or local environmental protection law***

This action violates no federal, state, or local environmental protection laws.

**APPROPRIATE USE, UNACCEPTABLE IMPACTS, AND IMPAIRMENT**

Sections 1.5 and 8.12 of NPS *Management Policies* underscore the fact that not all uses are allowable or appropriate in units of the National Park System. An “appropriate use” is a use that is suitable, proper, or fitting for a particular park, or to a particular location within a park. The uses proposed in the TRCP/EA were screened to determine consistency with applicable laws, executive orders, regulations, and policies; consistency with existing plans for public use and resource management; actual and potential effects to park resources; total costs to the Park Service; and whether the public interest would be served.

The TRCP/EA suggests “projects” as options for achieving desired conditions for resources and visitor experience in the Tower-Roosevelt area. Desired conditions are benchmarks for natural, cultural, and visual resources and visitor experience that should be achieved in order to preserve fundamental resources and values that contribute to what makes Tower-Roosevelt area significant within the park; these desired conditions tier off of the park’s purpose and significance within the National Park System.

Projects meet the requirements for necessary and appropriate visitor services or support facilities for visitor services. In most cases, the projects reflect the improvement or



replacement of aging facilities that already exist, such as: construct a commercial services building, a visitor contact station, additional public restrooms/vault toilets, remove the existing service station, expand the existing backcountry office, construct additional guest cabins at the Roosevelt Lodge, replace or expand saddle/hay barns, construct additional employee restroom/shower house and shade shelter, replace employee housing, replace the existing dining shelter and modify the serving shelter, reduce the existing general store, and create additional paved parking associated with these projects. Whether these already exist or are proposed projects, they are all common and vital facilities within most park units, and either directly or indirectly support those who visit this portion of the park. These uses are consistent with the 1974 Yellowstone National Park Master Plan, and the proposals of the 2001 Canyon Junction to Tower Junction Road Improvement Environmental Assessment. They are also consistent with the YNP Long-Range Interpretive Plan (2000), the park's Core Operations Plan (2008) and current concession contracts. Therefore, the Park Service finds that the Selected Action provides for appropriate use.

The planning components guide the location, size, appearance, and overall development footprint of projects. In addition, the NPS has adopted the Selected Action to better meet the desired conditions for resources and visitor experience. Additional mitigating measures in the plan further reduce impacts during project implementation. Therefore, implementation of the Selected Action will not result in any unacceptable impacts.

In analyzing impairments in the NEPA analysis for this project, the NPS takes into account the fact that if an impairment were likely to occur, such impacts would be considered to be major or significant under CEQ regulations. This is because the context and intensity of the impact would be sufficient to render what would normally be a minor or moderate impact to be major or significant. Taking this into consideration, NPS guidance documents note that "Not all major or significant impacts under a NEPA analysis are impairments. However, all impairments to NPS resources and values would constitute a major or significant impact under NEPA. If an impact results in impairment, the action should be modified to lessen the impact level. If the impairment cannot be avoided by modifying the proposed action, that action cannot be selected for implementation." (Interim Technical Guidance on Assessing Impacts and Impairment to Natural Resources, National Park Service, Natural Resource Program Center, July 2003).

In addition to reviewing the definition of "significantly" under the NEPA regulations, the NPS has determined that implementation of the Selected Action would not constitute an impairment to the integrity of Yellowstone National Park's resources or values as described by NPS *Management Policies* (NPS 2006 § 1.4). This conclusion is based on the NPS's analysis of the environmental impacts of the proposed action as described in the EA, the public comments received, relevant scientific studies, and the professional judgment of the decision-maker guided by the direction in 2006 NPS *Management Policies*. The EA identified less than major adverse impacts on geologic, paleontologic, soils, floodplains, wetlands, vegetation, rare plants, wildlife, threatened and endangered species, natural soundscapes, archeological, historic, cultural landscape, and visual resources; as well as on human health and safety, visitor use and experience, and park operations. This conclusion is further based on the Superintendent's professional judgment. Although the plan/project has some negative

impacts, in all cases these adverse impacts are the result of actions taken to preserve and restore other park resources and values. The NPS finds that the projects listed in the Selected Action are appropriate uses.

## **PUBLIC INVOLVEMENT**

The public was included in the planning process through public scoping from May 26 to June 30, 2006 (36 days). Information about the TRCP/EA document and planning process was distributed to the local public in the *Billings Gazette*, the *Bozeman Daily Chronicle*, and the *Gardiner Newsletter* in June 2009. Additionally, flyers were posted for public meetings, which were conducted in Gardiner, Montana (at the Yellowstone Association Headquarters Building on Main Street) and in Bozeman, Montana (at the Bozeman Public Library). The TRCP/EA was made available for public review and comment during a 31-day period beginning June 9, 2009 and ending July 9, 2009. The environmental assessment was posted to the Planning Environment Public Comment (PEPC) website and letters requesting consultation and comment were sent to the Wyoming State Historic Preservation Office (WYSHPO) and to the United States Fish and Wildlife Service (USFWS). Letters requesting comment were also sent to 26 tribal representatives and additional staff, totaling 168 letters. A total of 23 responses were received. All but two letters clearly stated a position for or against the alternatives. This total includes five letters or faxes from agencies (Wyoming State Historic Preservation Office, United States Fish and Wildlife Services, and three Native American tribes), 18 individual letters, and zero form letters. A preference for Alternative C was expressed by most of the respondents, while others preferred Alternative B. The 23 responses came from eight states and Canada and 11 were from outside the Yellowstone area. In addition to written comments, a staff-to-staff meeting was held with the Shoshone-Bannock Tribe, whose consultation resulted in additional substantive comments.

Substantive comments to the EA centered on three topics: 1) facility size and usage, 2) design standards, and 3) ethnographic resources. Responses to these comments are attached to this FONSI and resulted in slight modifications to the text of the EA that are listed in the Errata Sheet. Modifications are also summarized in the Selected Action section above. The modifications are clarifying in nature, are intended to better meet the purpose and need of the EA and do not have bearing on the determination of significant impact. The FONSI and Errata Sheets will be sent to all who commented.

## **CONCLUSION**

As described above, the Selected Action does not constitute an action meeting the criteria that normally require preparation of an environmental impact statement (EIS). The Selected Action will not have a significant effect on the human environment. Environmental impacts that could occur are limited in context and intensity, with generally adverse impacts that range from localized to widespread, short- to long-term, and negligible to moderate. There are no unmitigated adverse effects on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other significant characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were



**ERRATA SHEETS**  
**TOWER-ROOSEVELT COMPREHENSIVE PLAN ENVIRONMENTAL ASSESSMENT**  
**YELLOWSTONE NATIONAL PARK**

Substantive comments to the Tower-Roosevelt Comprehensive Plan Environmental Assessment centered on three topics: Expansion, reduction, and clarification of facilities, Design Standards (specifically wildland fire mitigation), and ethnographic resources. The topics, which are addressed below, resulted in minor changes to the text of the environmental assessment.

**TEXT CHANGES**

**Design Standards in each location:** Design Standards are adopted as described under Alternative B with modifications to reflect fire mitigation measures, specifically NPS RM 18.

**Design Standards in the Tower Administrative Location:** Design Standards are adopted as described under Alternative B with modifications to reflect fire mitigation measures and additional architectural components from historic structures in the area to enhance the visual compatibility with the adjacent historic district. Additionally, the Standards recommend use of the roof spaces as part of the second story to lessen the overall height of the structure.

**Design Standards in Yancey's Hole Location:** Design Standards are adopted as described under Alternative B with modifications to reflect fire mitigation measures and to limit the existing structures to replacement within the existing location.

**Project in the Roosevelt Corrals Location:** This FONSI adopts a change to one of the projects in this location: the shade shelter in may have either a wooden or fabric roof.

**Project in the Tower Ranger Station Location:** This FONSI adopts a change to one of the projects in this location: the expansion of the existing backcountry office can now be a backcountry/operational office.

**Project in the Tower Administrative Location:** This FONSI adopts a change to one of the projects in this location: the emergency services building suggested in the TRCP/EA can now be an operational services building.

**Change in project description:** Future potential projects for each location are described as "Possible Projects" in the TRCP/EA. In the FONSI and the TRCP, these projects are referred to as simply "projects."

**Page 25 of the TRCP/EA:** Tower Service Station has a development footprint of 1,300 square feet

**Table 3 of the TRCP/EA:** Same correction as above

**Update to Table 4:****At-a-Glance Comparison of Development Footprint and Projects for Selected Action**

The Selected Action adopts Alternative B with modifications for Projects and development footprints that are proposed for each of the eight locations described in the table below. The square footage for each location is the amount of development footprint (the square footage of buildings and parking at ground level) that can be added to the existing footprint. The current development footprint can be replaced if it is the same square footage without counting toward the allowance of the additional footprint. If a current building or paved parking area is replaced by a building or paved parking area that is larger than previously existed, the extra footage will count toward the allowance. (Table found on next page.)

Note: A “net gain or reduction” in footprint is the square footage, relative to current conditions, that a development may expand or contract

## Selected Action

Location	Development Footprint and Projects
<b>Roosevelt Lodge</b>	<p><b>Utilize planning zone from Alternative B.</b> Not to exceed 1,300 square feet net gain in additional building footprint and 2,000 square feet net gain in additional parking footprint. Projects:</p> <ul style="list-style-type: none"> <li>• Construct employee restrooms and shower house</li> <li>• Improve Roosevelt Lodge parking</li> <li>• Construct cabins</li> </ul>
<b>Roosevelt Corrals</b>	<p><b>Utilize planning zone from Alternative B.</b> Not to exceed 2,000 square feet net gain in additional building footprint and no net gain in parking footprint. Projects:</p> <ul style="list-style-type: none"> <li>• Replace or expand saddle barn</li> <li>• Construct shade shelter</li> <li>• Replace or expand hay barn</li> </ul>
<b>Tower Ranger Station</b>	<p><b>Utilize planning zone from Alternative C.</b> Not to exceed 500 square feet net gain in additional building footprint and no net gain in parking footprint. Projects:</p> <ul style="list-style-type: none"> <li>• Expand existing backcountry operations office</li> </ul>
<b>Tower Administrative</b>	<p><b>Utilize planning zone from Alternative B.</b> Not to exceed 5,400 square feet net gain in additional building footprint and no net gain in parking footprint. Projects:</p> <ul style="list-style-type: none"> <li>• Construct employee housing</li> <li>• Construct operational services building</li> </ul>
<b>Tower Junction</b>	<p><b>Utilize planning zone from Alternative C.</b> Not to exceed 2,000 square feet net gain in additional building footprint and 15,000 square feet net gain in additional parking footprint. Projects:</p> <ul style="list-style-type: none"> <li>• Construct commercial service building</li> <li>• Remove service station building—fuel service only</li> <li>• Construct public restrooms</li> <li>• Construct visitor contact station</li> <li>• Improve parking for 60 auto and 4 oversized vehicle spaces</li> <li>• No change to Grand Loop Road</li> </ul>
<b>Tower Fall Trailhead</b>	<p><b>Utilize planning zone from Alternative C.</b> Existing building footprint or net reduction in existing building footprint to 4,999 square feet, and 16,000 square feet net gain in additional parking. Projects:</p> <ul style="list-style-type: none"> <li>• Reduce the size of the Tower Fall General Store</li> <li>• Improve the Tower-Fall parking</li> </ul>
<b>Tower Fall Camp-ground</b>	<p><b>Utilize planning zone from Alternative C.</b> Not to exceed 200 square feet net gain in additional building footprint and no net gain in parking footprint. Projects:</p> <ul style="list-style-type: none"> <li>• Construct vault toilet in campground</li> </ul>
<b>Yancey’s Hole</b>	<p><b>Utilize reduced planning zone from Alternative B.</b> Not to exceed 125 square feet net gain in additional buildings footprint. Projects:</p> <ul style="list-style-type: none"> <li>• Replace dining shelter</li> <li>• Modify serving shelter</li> <li>• Construct vault toilet</li> </ul>

Note: This Plan/EA provides for the replacement of existing development footprint in addition to new development footprint. Changes to historic properties require compliance with Section 106 of the National Historic Preservation Act.

## **Additional Related Laws, Regulations, and Policies**

Add the following to the TRCP/EA pp. 14-16:

### **NPS Guiding Laws, Regulations, and Policies**

*NPS-28 Cultural Resources Management Guidelines 1997 (Chapter 10, pages 157-176)*

### **Other Applicable Federal Laws, Executive Orders, and Regulations**

Add to this section:

*American Indian Religious Freedom Act of 1978, (AIRFA), (P.L. 95-341).*

*Archeological Resources Protection Act of 1979, (ARPA), (P.L. 96-95).*

*Native American Graves and Repatriation Act of 1990, (NAGPRA), (P.L. 101-601).*

*United States Department of the Interior, Executive Order 3175, November 8, 1993.*

*Executive Order 12898, issued by President Clinton on February 11, 1994, (Federal Register vol. 59, No.32; Wednesday February 16, 1994).*

*Executive Order 13007, issued by President Clinton on May 26, 1996.*

*Director's Order 71: Government-to-Government Relationships with Tribal Governments*

*National Register Bulletin 38 – Traditional Cultural Properties*

*Director's Order 12: Conservation Planning, Environmental Impact Analysis, and Decision-making*

## **SUBSTANTIVE COMMENTS**

### **SIZE AND USE OF FACILITIES**

**Comment:** I am unaware of evidence that the public have demanded or solicited expansion of commercial facilities at T-R or that the public has indicated that the package of proposed development / expansion is either an improvement or acceptable.

**Comment:** The Park Service has failed to demonstrate that "desired conditions" can only be achieved by expanding commercial build up (buildings, parking, and consequent activity) as this "plan" proposes. Rebuilding existing services / facilities in exactly the same spot / same size DOES achieve desired conditions.

**Comment:** Include provision for a REDUCTION of building footprint and parking areas, particularly as they pertain to concession activities that are readily available nearby (general

store, gas station, dude ranch recreation.

**Comment:** The comprehensive plan, while providing for development in an orderly and desired manner; in no way should be interpreted to prevent the downsizing of development in extent, type and capacity of facilities, apart from those which provide for necessary health and human safety.

**Comment:** The purpose and need does not provide enough rationale for the expansion of facilities or for the removal of the Tower Fall Store.

**NPS Response:** Currently, approximately three million visitors come to Yellowstone National Park each year. While one of the smallest of the developed areas, many visitors utilize facilities in the Tower-Roosevelt area. The area has longer lengths of stays (2006 Visitor Use Study) than other developments in the park. The Tower-Roosevelt Comprehensive Plan identifies the need to expand or reduce facilities as possible options for the area. Structures may also be removed, replaced in existing locations, or relocated to locations where resources are less impacted. While development footprint expansion is proposed in some areas, reduction is also indicated within the plan. The age and condition of several of the structures noted in the TRCP reduce the safety and efficiency of park and concessions operations. As stated in the 2007 YNP Core Operations One-Year Report, the park's goal is to "[r]educe the number of buildings, roads, trails, and utility systems as well as features (vehicles, stock, etc.) that are not core, in order to improve the condition of those we keep." Another goal is to provide safe operations and visitor experiences.

Although Roosevelt Lodge is the smallest Lodge in the park, the facilities are almost fully utilized. According to the 2004 Site Visit for Concessions Contract CCYELL0775, Lodging, Food and Beverage, Retail, Camping, and other Visitor Service, the occupancy rates for Roosevelt Lodge Roughrider and Frontier cabins are 98.9% during peak season and 97.6% on average.

Needs identified during internal and external scoping included the following:

- Approximately 17 employee cabins (housing an average 2.9 employees per cabin) and an employee recreation hall have need for a bathhouse with restrooms to ensure sanitation and safety, especially at night with wildlife in the area.
- Some of the employees are currently living in cabins that could be available to visitors or could be upgraded to ensure better living conditions.
- The Roosevelt Lodge parking impacts historic views of the Lodge and from the Lodge porch. This area is also congested and inadequate for the types and numbers of vehicles. Access for deliveries and emergency vehicles is constrained by inadequate turning distances.
- The Saddle Barn at the Roosevelt Corrals has exceeded its useful life; tack for 90 horses, veterinary supplies, wrangler housing, and offices are located in several small structures, which are dilapidated. There is a need for adequate storage for tack, saddles, feed, offices, and corral operations for safe operations. The Hay Barn is also aging and needs replacement to store feed out of the weather.
- Each evening, approximately 210 visitors wait in the heat and weather to load wagons or horses from the corral area to attend the Yancey's Hole Cookout; visitors need a shelter for protection from sun, heat, and other weather. Once at the Yancey's Hole cookout, which is booked to capacity each night, there are only two vault toilets. An



additional vault toilet is needed for sanitation and to reduce waiting times in long lines. Additionally, both the Serving Shelter and the Dining Shelter at Yancey's Hole need replacement as the structures have aged over time; new roofs are needed for both and the Serving Shelter needs a new concrete surface near the grilling area to reduce odors that might attract wildlife. The Yancey's Hole Cookout is often the only backcountry type of experience many visitors experience, and leads to many wonderful memories.

- The Tower Service Station no longer functions as a full service repair shop and could be downsized. It is architecturally incompatible with the surrounding historic, rustic structures and impacts the views along the Grand Loop Road and the adjacent valley. It can also be seen from remote trails in the area.
- All of the backcountry visitors in the Tower Roosevelt area are served in a 207 square foot office with no room to accommodate some of the training materials used in other locations for backcountry experiences. There are no other visitor contact facilities in the area where visitors may obtain information or educational materials.
- All of the area's NPS employee housing and emergency equipment are located in the Tower Administrative location. Employee housing is inadequate with sanitation, rodent, and space concerns for the health and safety of employees. There are no adequate facilities for the plows, ambulances, and other equipment needed to serve the area, which operates year-round, sometimes in winter conditions of deep snow and low temperatures. The need for an operational services facility was identified in the 1992 Environmental Assessment Community Plan for Tower Junction.
- The Tower Fall Store provides services to the visitors traveling the Grand Loop Road, the Tower Fall Trail and the Tower Fall Campground. There are no other services for nearly 20-30 miles in any direction. Sewage system limitations are a concern for the capacity and design of the current system that serves the area including the Tower Fall Store and restrooms; no additional loading is possible. After consideration of public comment, the Selected Action will retain the store with the potential to reduce the size by up to half of the current size. The parking area for the store is often congested and inadequate for the type and quantity of vehicles. It needs to be expanded and redesigned for the size of the facility in place.

**Comment:** Any additional development should be in the surrounding entrance communities. Gardiner is particularly challenged to remain economically viable beyond the traditional summer months and would seem to be a much more ideal location for any further YNP development.

**NPS Response:** The NPS supports economic growth in gateway communities such as Gardiner. However, the NPS only has authority to construct buildings and/or services on NPS-owned land; therefore, it does not have authority for visitor services facility replacement in Gardiner. Additionally, there is no gateway community close enough to the Tower-Roosevelt area to replace the services needed by visitors to the area; Gardiner is 23 miles and Cooke City is 32 miles from this area, respectively.

**Comment:** The statement "enhanced parking in front of the Roosevelt Lodge provide[s] benefit" is unclear. Does enhanced parking entail more parking spaces or additional landscaping?

**NPS Response:** The changes to Roosevelt Lodge parking are intended to improve the viewshed from the Roosevelt Lodge porch by redesigning the parking directly in front of the Lodge. This area is currently cluttered with cars on an aging, potholed parking lot. Automobiles, including RVs, block the view from the Lodge porch, and detract from the rustic, western feel of the area. The Selected Action allows for a redesign of parking in this area, potentially moving parking to other areas within the Planning Zone, and thus recapturing the views and ambiance that visitors have historically enjoyed. This plan includes alternate parking locations that comply with the Design Standards for this location, thus allowing for designs that may reduce the paved parking footprint in front of the Roosevelt Lodge.

**Comment:** I hope this process will become the standard for park management although I do have some concern that the “zoning” process may limit the public’s input on the details of the allowable changes.

**NPS Response:** The Tower-Roosevelt Comprehensive Plan is meant to provide a framework to ensure that the Tower-Roosevelt area will continue to offer an experience that supports the rustic, small scale western camp setting and experience and to maintain the significant resources and values expressed. The three planning components, including the location, size, and type of Planning Zones; the type of function (use) and the quantity of development footprint that constrains the size of future construction in each location; and all of the restrictions on future construction contained within the Design Standards, such as building heights, roof pitches, materials, historic architectural elements, and the application of sustainable or fire prevention practices provide guidance to protect the area resources. Substantive comments were carefully considered in drafting the final plan. Most of the public comment focused on the Tower Junction location. When more site-specific information is available regarding the function, location, and size of any proposed commercial or visitor contact structure at Tower Junction, the public will be asked to participate through the environmental assessment process. A new EA would tier off of the existing TRCP/EA.

## **DESIGN STANDARDS**

**Comment:** The comprehensive plan failed to recognize NPS-Reference Manual-18 (Wildland Fire Management) 3.7 (Facilities, Construction and Defensible Space) that addresses all NPS design and construction projects. The plan is inconsistent when addressing the use of fire resistant material. The plan recognized the access roads are very narrow-too restrictive for large fire engines, but does not offer any solutions to this problem.

**NPS Response:** The NPS planning team met with members of the Yellowstone fire staff to address fire mitigation in the Tower-Roosevelt Comprehensive Plan following the adoption of NPS-RM-18 by the Superintendent of Yellowstone on July 2, 2009. Mitigating measures from the fire staff were incorporated into the final plan. Changes include reducing the square footage of the development footprint in the decision for the Roosevelt Lodge area. This minimizes additional cabins and facilities that would require fire protection, and therefore lessens congestion for structures and parking. The Planning Zone from Alternative B was utilized in the decision to enhance future parking designs that could

facilitate vehicular access for fire vehicles. Additionally, the development footprint was significantly reduced from Alternative B to avoid building many more structures to protect during fire events. The plan adopts Design Standards that include NPS-RM-18, specifically addressing fire resistant material, technology, and practices throughout the plan.

**Comment:** The Design Standards for buildable administrative zones did not include guidance for avoiding adverse effects to historic districts. When historic districts and the other buildable zones are in close proximity, such as the Tower Administrative Location, the effect on historic districts by undertakings in the buildable zones should be considered.

**NPS Response:** Design standards further addressing this issue have been adopted in the final plan. All actions that affect historic structures, including those in adjacent buildable zones, will go through project specific consultation (required by Section 106 of the National Historic Preservation Act) with the State Historic Preservation Officer and staff to ensure that the integrity of historic structures is retained and impacts are minimized.

**Comment:** When discussing possible changes to Mission 66 buildings and structures, if they are determined eligible, rehabilitation in addition to remodeling or removal should be considered.

**Comment:** Whatever you do, replace or remodel that ugly gas station...it does not fit the Yellowstone-Tower-Roosevelt environment or design character whatsoever!

**Comment:** I would like to see the gas station building removed and the dumpsters, rest rooms and the phone booth relocated to the gas station footprint; and, possibly, a visitor contact station.

**Comment:** The Mission 66 gas station does not contribute to the historic context of the already established Roosevelt/Tower historic area.

**NPS Response:** Planning staff considered a range of options for the Mission 66 Tower Service Station. Design standards were tailored to enhance architectural compatibility. The TRCP includes as one project the possible removal of the Mission 66 Tower Service Station. If the Tower Service Station is determined eligible for the National Register of Historic Places, mitigation prior to removal will be determined through consultation with the State Historic Preservation Officer, following Section 106 of the National Historic Preservation Act. Park staff is currently working on a Historic Context Study for all Mission 66 structures throughout Yellowstone.

**Comment:** Pave the parking areas lots and roadways, even in the Roosevelt employee and guest cabin area.

**NPS Response:** While paving would reduce dust in the Roosevelt Lodge area, such paving would detract from the experience and setting of this historic, rustic lodging area. Further, the additional impervious surface could impact water resources and add to maintenance costs. The plan calls for a net gain of up to 2,000 square feet of additional paved parking footprint within the Roosevelt Lodge Historic Zone. The parking in front of the lodge is proposed to be redesigned to enhance the view from the Lodge porch, reduce congestion and separate the parking from the lodge.

**Comment:** The overall Design Standards (Figure 4) are more specific than the individual standards for each historic district. Typically site specific standards, which are tailored to an

area's particular characteristics, are more detailed than overall general guidance. Perhaps the Design Standards in figure 4 should be overarching historic preservation principles for the Tower-Roosevelt area.

**NPS Response:** The examples given in Figure 4 were not intended to be construed as overarching standards for the planning area. Figure 4 (Figure 1 in the TRCP) has been revised to outline the acceptable limits of change and define the three planning components; the Buildable Planning Zones, Planning Prescriptions, and Design Standards. The Buildable Planning Zones include the following: natural, circulation, historic, development, and administrative zones. The Prescriptions identify the primary function (visitor services, housing, etc.) of development footprint (square footage of buildings, roads, and pavement) that can take place within a Planning Zone. Design Standards (Figure 1) are specific restrictions applied to structures within individual zones and have been revised to include definitions, not examples, for how the Planning Prescriptions and Design Standards function within the Plan; these changes are included in the Errata Sheets. Figures 2b-9b will describe the specific examples of Planning Prescriptions and Design Standards for each location within the Plan.

**Comment:** Additional cabins will unnecessarily increase the number of guests at the Lodge which, in turn, results in more traffic, pressure on the capacity of utilities, the dining area, and communal bath facilities, more safety issues, more employee housing facilities, and generally diminishes the visitor experience.

**NPS Response:** The Selected Action incorporates the smaller building footprint than Alternative B; a maximum of 1,300 square feet of new development in the Roosevelt Lodge location. This smaller building footprint will provide a limit on the amount of development that can happen at this location and minimize related impacts. The two projects that may be undertaken at this location are (1) construct employee restrooms and shower house, and (2) construct more cabins. The estimated size of the restrooms/shower house would likely be in the range of 500-650 square feet. This leaves roughly 500-650 square feet remaining for the construction of additional cabins if both projects are constructed. The size of the current guest cabins in this location is in the range of 240-650 square feet. Allowing only this small increase in building footprint will not result in a diminished visitor experience. Any increase in guest numbers would be minimal and the current infrastructure in place (e.g. utilities, dining area, employee housing) would be able to absorb the effects of this small increase.

**Comment:** Alternatives B and C of the proposal address square footage gain of building footprint, they should address overall square footage of buildings. Proposal should prohibit multi-story buildings.

**NPS Response:** The current building footprint in the Tower-Roosevelt area is 115,000 square feet. The Selected Action will allow up to an additional 11,025 square feet for a total possible increase of just under ten percent. Therefore the total maximum overall square footage of buildings in the Tower-Roosevelt area will be limited to 126,025 square feet, which addresses the overall square footage of buildings for the area. Because of the small scale of buildings in the area, the plan also manages the overall size of buildings by creating limits within the design standards such as "avoiding large single structures." Multi-story buildings are allowed in various locations, but cannot exceed surrounding

building heights or the tree canopy. These height limits are included in order to minimize visual impacts.

**Comment:** Please do not go forward with the building at Tower Junction.

**Comment:** I realize that there is a parking problem at the Tower Falls trail site but moving the general store to the Tower junction is NOT the answer.

**Comment:** Eliminating services at Tower Fall Trailhead would only displace that burden to the extremely sensitive Roosevelt Lodge historic site, which I oppose.

**NPS Response:** The final plan incorporates the smaller development footprint of Alternative C at Tower Junction (Figures 6a-6b). Allowable projects will be contained within 2,000 square feet of additional building footprint and 15,000 square feet net gain in parking. This could include a new visitor contact station, commercial service building, new public restrooms, and adapting or removing the current service station. At the Tower Fall Store, the final plan incorporates the development footprint of Alternative C, including leaving the store at its current size or reducing it by up to half (Figures 7a-7b). Parking will be improved by increasing the lot by up to 16,000 square feet and redesigning the parking to make it safer for visitors.

**Comment:** Existing store becomes a backcountry office, ice cream, and bathroom at Tower Fall and would not move to Tower Junction.

**NPS Response:** The decision to retain the Tower Fall Store in its present form or at a reduced size precludes the option of including a backcountry office in the store. The function for the Tower Store in the plan is primarily a Visitor Concessions function. While there is a small NPS visitor function, adding to this function could create congestion and unnecessary impacts to parking and infrastructure as determined through the NEPA analysis. The current Tower Backcountry Office is centrally located to provide an NPS visitor service, and the Selected Action allows for a minimal expansion of the building to better serve the public. Parking and infrastructure are in place to support this activity in this location.

**Comment:** Construction of a permanent trail to view Tower Falls which is not subject to erosion must be included in the plan.

**Comment:** The Park Service has been negligent in restoring the trail to the bottom of Tower Fall.

**NPS Response:** The Tower Fall trail is outside the scope of the Tower-Roosevelt Comprehensive Plan as it is beyond the planning boundary of resources surveyed. Environmental site considerations and engineering are beyond the scope of this plan. The Tower Fall trail will be addressed in a separate planning document in the future.

## **ETHNOGRAPHIC RESOURCES**

**Comment:** The Tower-Roosevelt Comprehensive Plan did not sufficiently address tribal rights or the continued viability of historic and contemporary tribal resource values.

**NPS Response:** The Tower-Roosevelt Comprehensive Plan does not address the management of tribal rights; that is included in the Superintendent's Compendium for the seven tribes with treaty rights within the park. An ethnographic study was completed with

other resource inventories for the Tower-Roosevelt Comprehensive Plan. While ethnographic resources were discussed within the planning boundary, no specific locations for resources were identified.

**Comment:** Ethnographic resources should not have been dismissed from the Tower-Roosevelt Comprehensive Plan as an impact topic.

**NPS Response:** Ethnographic resources were discussed within the planning boundary in the Ethnographic inventory for the Tower-Roosevelt Comprehensive Plan. While the National Park Service recognizes that traditional use such as the gathering of plant materials, camping, or access to spiritual locations, occurs in the Tower-Roosevelt Area and that the landscape itself is a resource, no specific locations where resources were present were identified in the inventory that would be impacted by the plan. As the impacts within the Environmental Assessment were minor or less, this topic in addition to several others, were dismissed.

**Comment:** Laws and Policies pertaining to Tribal rights were not included in the EA.

**NPS Response:** Laws and Policies pertaining to Tribal rights are included in the Errata Sheets.