National Park Service
U.S. Department of the Interior

Grand Teton National Park
Wyoming

July 2009

Gros Ventre Campground Rehabilitation
FINDING OF NO SIGNIFICANT IMPACT

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Grand Teton National Park and John D. Rockefeller, Jr. Memorial Parkway
Gros Ventre Campground Rehabilitation

The Gros Ventre Campground spanning 170-acres is the largest of the six campgrounds in Grand Teton National Park. Within eight loops there are 365 visitor sites, 18 administrative sites, 14 comfort stations, a two-stall RV dump station, an amphitheater, and a small administrative area. The campground infrastructure and subsequent impervious surface consists of over 4.5 miles (11 acres) of pavement in the road system, parking, and amphitheater.

Gros Ventre Campground facilities and infrastructure have not been upgraded or changed since the campground first opened 45 years ago. The failing infrastructure has required emergency repairs three to five times a year and compromises public health and safety as well as the quality of the Gros Ventre and Snake River aquifers. In addition to failing infrastructure, Gros Ventre Campground design and services do not meet today's park visitor and administrative needs. There are no visitor utility hookup sites or Architectural Barriers Act compliant campsites. Occupancy rates are relatively low; in the last 10 years, more than 250 campsites were filled on only 68 visitor nights and the campground only filled once in 2003. The campground amphitheater is oversized and underutilized, as the numbers of visitors attending evening programs is low relative to both the size of the amphitheater and comparative attendance at other park amphitheaters. The amphitheater parking lot is used primarily for excess and oversized vehicle parking. Although visitor use of the Gros Ventre Campground has declined in recent years, RV use and size has increased. In addition, park-wide there is an estimated need of over 70 administrative RV campsites for park, partner, and concessioner seasonal employees and volunteers who are critical to park operations, and this number is expected to grow in the future. The proposed action in the Gros Ventre Campground helps address some of the RV campsite needs in the southern portion of the park.

The National Park Service recently prepared an Environmental Assessment (EA) for rehabilitation of the Gros Ventre Campground in Grand Teton National Park. The EA was prepared to identify project issues and develop alternatives to address concerns related to aging campground infrastructure, visitor use demands, and seasonal employee housing shortfalls. A no-action alternative and a preferred alternative were analyzed in the EA and the preferred alternative (proposed action) was selected after a careful review of public comment and impacts to cultural, natural, and social resources. Concerns identified during scoping and evaluated in the EA included visitor campsite and amenity preferences; administrative campsite locations; accessibility; utility and facility upgrades; and campground operations (e.g., year-round use options, reduction of footprint size, safety concerns and the need to document housing demands and use/ occupancy trends).

This document records 1) a Finding of No Significant Impact (FONSI) 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.

PREFERRED ALTERNATIVE

The preferred alternative (selected action) will reduce the total number of campground sites by 77, resulting in 306 sites: 254 for visitor use and 52 for administrative use. The total number of visitor use campsites will be reduced by 111, as 44 visitor sites will be converted to

administrative sites and 67 visitor sites will be permanently closed. Campground layout and organization will be based primarily on a segregation of administrative and visitor use areas. Up to 50 visitor campsites will be converted to electric hookup sites. Up to 34 additional campsites in Loop E will be converted to full hookup administrative use sites (water, sewer, electric), which will result in a total of up to 44 administrative sites within that loop. This reconfiguration will expand the footprint of each site; therefore, lowering the overall number of sites. The entirety of sites within Loop E will be for administrative use only by the National Park Service, its concessioners, or other partner employees. The administrative sites outside of Loop E will remain as currently constructed.

The four comfort stations located in loops F and G will be demolished and new accessible comfort stations will be constructed out of the flood prone zone to serve Loop F and the new group sites. All above ground facilities and roadways serving the Group Loop (5 sites), Loop G (36 sites), and 10 sites on the West Corridor Road west of Loop F will be closed permanently, man-made features will be removed, and the area revegetated. Additionally, an accessible shower facility for visitor use will be constructed near the new Group Loop and one behind the contact station. A new shower and laundry facility for administrative use will be constructed in Loop E. The group camp will be relocated further east on the West Corridor Road adjacent to Loop F, replacing individual sites on the collector road with new group sites. The group sites will be designed to serve diverse group types and sizes with tent pads; gathering, cooking, and eating areas; parking and camping facilities; and a new shower station. In addition to improved and modernized group sites, the parking area for the group sites will better accommodate the size of groups using the campsites. The current amphitheater size will remain the same; the amphitheater parking lot will be reduced by 25 to 50 percent and the former parking lot area will be revegetated. Implementation of the preferred alternative will reduce the overall campground footprint and create eight additional acres of available wildlife habitat through revegetation and enhancement efforts.

A large portion of the 45-year-old infrastructure will be repaired or replaced. The water treatment facility will be replaced and a new source well will be installed, along with a water treatment building, a pressure tank, pump, chlorination equipment/controls, and waterline to reconnect to the existing distribution system. An improved wastewater system will be constructed to serve loops E and F, the relocated group sites, the campground office, and the administrative sites behind the office. Two new leach fields will be constructed: one behind the Contact Station and one east of Loop F. New sewer line, septic tanks, manholes, and lift stations will be constructed along with these leach fields. The dump station area will be upgraded, enlarged, and realigned to accommodate multiple full length RVs at the same time. Additionally, new state required monitoring wells will be constructed to monitor the new leach field serving Loops E, F, and Group. As electric lines directly serving the campground are replaced or added, new lines will be placed underground when possible.

MITIGATING MEASURES

A set of mitigation measures and guidelines has been developed as part of implementing the preferred alternative. These measures and guidelines are provided at the end of this document and are specific to the project area and to the resource issues analyzed in the EA.

ALTERNATIVES CONSIDERED

A no-action alternative and the preferred alternative were analyzed in the EA. Under the No Action Alternative, the campground would continue to be managed with roughly the same campsite configuration as currently exists, with 18 administrative use sites and 365 visitor use sites. The four comfort stations located in loops F and G remain located in the flood prone area, often precluding the availability of these sites in the early season. The campground was built prior to the enactment of the Architectural Barriers Act of 1968 and is therefore not legally required to provide accessible facilities. The campground would therefore continue to lack accessible campsites and comfort stations to meet the needs of visitors with disabilities. The Gros Ventre Campground would not provide any utility hookups for visitors. A large percentage of the 365 RV and tent campsites available for visitors would remain underutilized. Administrative use for employee housing would be limited to the existing 18 full hookup RV sites. All utilities would remain in place and in their current condition. The 45-year-old water system would remain in place along with the existing water treatment building constructed around the well. The existing undersized dump station, campground office/contact station and associated parking would also remain in place and continue to share a waste water system and leach field. All power lines would remain above ground.

The preferred alternative 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.

Implementation of the No Action Alternative would fail to move the National Park Service toward achievement of all six of the goals set forth by the Council on Environmental Quality in §101 of the National Environmental Policy Act. Failure to address aging infrastructure and facility issues would likely result in adverse effects to health, safety, and the natural environment. As such, trustee obligations for future generations would not be met (goal 1), nor would the assurance of safe, healthful, productive, and aesthetically and culturally pleasing surroundings (goal 2). The No Action Alternative would not attain the widest range of beneficial uses of the environment because underused portions of the campground located in areas of valuable wildlife habitat would not be restored, thereby not maximizing beneficial uses (goal 3). In terms of goal 4, the No Action Alternative would not support the most diverse individual choices because of the limited mix of campsite uses and inaccessibility per the American

Disabilities Act of 1965. For reasons already stated, as well as failure to address seasonal flooding of some campsites, the No Action Alternative would also fall short of achieving a balance between population and resource use that would permit high standards of living (goal 5). Finally, the No Action Alternative would also fall short of enhancing the quality of renewable resources and recycling depletable resources to the maximum extent practicable (goal 6) because such restoration and rehabilitation measures would not be implemented if current management conditions were to continue.

The preferred alternative meets goals 1, 2, and 3 through concentration of the campground footprint and by replacement of failing infrastructure, which effectively minimizes health, safety, and/or environmental degradation. The preferred alternative also achieves goals 4 and 5, as visitors will be able to enjoy heightened amenities, including electric hookups. At the same time, the preferred alternative balances visitor demand with preserving the rustic nature of the campground by limiting electric hookup conversion to 25% of the campsites. The preferred alternative will reconfigure campsites to ensure that visitors continue to enjoy a small campground character. The range of visitor uses will also be appropriately expanded with the addition of facilities compliant with the American Disabilities Act. The preferred alternative meets the goal 6 by preventing wastewater dumping in non-designated areas, which has the potential to negatively affect streams and other waterways in the area.

After careful review of potential resource and visitor impacts, and developing proposed mitigation for impacts to natural and human environment, the environmentally preferred alternative is the National Park Service preferred alternative. Overall, the preferred alternative (1) provides a high level of protection of natural and cultural resources while concurrently attaining the widest range of neutral and beneficial uses of the environment without degradation; (2) maintains an environment that supports diversity and variety of individual choice; and, (3) integrates resource protection with an appropriate range of visitor uses.

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

Minor adverse impacts of the preferred alternative include construction-related disturbances to both the visitor and resources. Mitigation measures proposed will alleviate these immediate and long-term impacts. Once completed, the campground improvements will have long-term, beneficial impacts for resources, visitors, and park operations. The reduction of the overall campground footprint and creation of eight additional acres of available wildlife habitat through revegetation and enhancement efforts will benefit wildlife in the long-term. Campground visitors will have the choice of a variety of camping experiences, including tent-only sites, RV electric hook up sites, and shower facilities. In addition, upgrades to the utilities infrastructure at the campground will help alleviate emergency repairs and reduce staff time required for maintenance.

Degree of effect on public health or safety

Public health and safety was analyzed as an issue in the EA under the impact topic Visitor Use and Experience. Current aging campground facilities pose a threat to public health and safety. For example, water infrastructure upgrades are needed to ensure the campground has a continuous supply of clean, potable water. Also, there are leaking wastewater lines and a failing leach field, both of which could expose visitors to raw sewage or enable raw sewage to enter the ground water table and the Gros Ventre River. Implementation of the preferred alternative will ensure that these health and safety issues are addressed, and resultant impacts will be beneficial and moderate in intensity.

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

As described in the EA, there were no measurable effects to cultural resources identified for the preferred alternative. There are no prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas affected.

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

There are no highly controversial impacts anticipated to the quality of the human environment. Public scoping and comment on the proposal did not indicate any contentious issues and the EA did not identify significant impacts associated with the preferred alternative.

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

No highly uncertain effects or unique or unknown risks are anticipated to occur under the preferred alternative. The proposal involves upgrading utility infrastructure to improve health and safety, visitor experience, and park operations. Actions proposed under the preferred alternative will utilize standard construction and operation techniques, best management practices and other mitigations to reduce 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 preferred alternative (Alternative 2) is not expected to set a precedent for future actions with significant effects, nor does it represent a decision in principal about any future consideration elsewhere in the National Park System.

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

As demonstrated in the EA, there are no significant cumulative effects.

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 project area was inventoried in 2000 by the University of Wyoming, with additional surveys once the project was proposed and as the design evolved. No archaeological sites or historic properties were identified within the proposed project area. The National Park Service determined there would be no historic properties affected. Compliance with §106 of the National Historic Preservation Act was completed with concurrence of this determination by the Wyoming State Historic Preservation Officer on June 3, 2009.

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

In a letter dated June 26, 2009, the USFWS concurred with the National Park Service on its determination of "no effect" for the yellow-billed cuckoo and Canada lynx. Similarly the USFWS concurred with the determination of "may affect, but is not likely to adversely affect" for the gray wolf. Mitigation measures listed in the EA on pages 34-35 are part of the consultation and will be followed to protect these species.

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

Appropriate Use
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. The proposed action was 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 National Park Service; and whether the public interest would be served.

Campgrounds are common and vital facilities in most park units. Proper location of infrastructure, materials and methods will ensure that unacceptable impacts to park resources and values will not occur. The proposed campground improvements are consistent with the Grand Teton National Park Master Plan (1976) and other related park plans. With this in mind, the National Park Service finds that the campground improvements are an acceptable use at Grand Teton National Park. Therefore, the Park Service finds that the preferred alternative is an appropriate use.

Unacceptable Impacts
Park managers will continually monitor the project (all park uses) to prevent unanticipated and unacceptable impacts. Campgrounds are common and vital facilities in most park units. Proper location of infrastructure, methods and materials used, as well as application of mitigations measures will ensure that unacceptable impacts to park resources and values will not occur. The proposed campground improvements are consistent with the Grand Teton National Park

Master Plan (1976) and other related park plans. With this in mind, the National Park Service finds that the campground improvements are an acceptable use at Grand Teton National Park.

Impairment

In analyzing impairments in the NEPA analysis for this project the National Park Service takes into account the fact that if an impairment were likely to occur, such impacts will be considered to be major or significant under CEQ regulations. In addition to reviewing the definition of "significantly" under the NEPA regulations, the NPS has determined that implementation of the preferred alternative will not constitute an impairment to the integrity of Grand Teton 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 cultural resources, soils, vegetation, water resources, wildlife, park operations, and visitor use and experience. This conclusion is further based on the Superintendent's professional judgment, as guided and informed by National Park Service policy and guidance, and the Grand Teton National Park Master Plan (1976) and other related park plans. 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. Overall, the plan results in benefits to park resources and values, opportunities for their enjoyment, and it does not result in their impairment.

PUBLIC INVOLVEMENT

In May 2009, a postcard listing the availability of the EA and its posting to PEPC for review was sent to over 600 individuals on the park core mailing list. In addition, 50 hard copies were sent to agencies, organizations, and interested parties. The same information was made available on the park's website and at the Teton County Library and Moose Visitor Center. The EA was made available for public review and comment during a 30-day period ending June 26, 2009. A total of 15 responses were received. This total includes two letters from agencies (Wyoming Game and Fish and USFWS), one letter from a conservation organization, two from National Park Service concessioners, and 10 from the public. Of the 10 public responses, five were from outside Teton County.

Substantive comments to the EA centered on shower facilities, group campsites, RV and bicycle campsites, administrative campsites, natural resources (wildlife, night sky, lightscape, and soundscape), and project timeline. These concerns resulted in minor changes to the text of the environmental assessment and are addressed in errata sheets attached to this FONSI. The FONSI and errata sheets will be sent to all commentors.

CONCLUSION

As described above, the preferred alternative does not constitute an action meeting the criteria that normally require preparation of an environmental impact statement (EIS). The preferred alternative 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 cultural resources, soils, vegetation, water resources, wildlife, park operations, and visitor use and experience. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection law.

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

Recommended: _____ 7/23/09
Superintendent — Date

Approved: _____ 7/24/09
Director, Intermountain Region — Date

MITIGATION MEASURES INCLUDED AS PART OF THE PREFERRED ALTERNATIVE

CULTURAL RESOURCES

- All actions including mitigation, will require consultation with and clearance by the Wyoming State Historic Preservation Office under §106 of the National Historic Preservation Act.
- Should construction unearth previously undiscovered archaeological resources, work will be stopped in the area of any discovery, and the park will consult with the state historic preservation officer/tribal historic preservation officer and the Advisory Council on Historic Preservation, as necessary, according to §36 CFR Part 800.13, Post Review Discoveries. In the unlikely event that human remains are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act (1990) will be followed.
- The National Park Service will ensure that all contractors and subcontractors are informed of the penalties for illegally collecting artifacts or intentionally damaging archaeological sites or historic properties. Contractors and subcontractors will also be instructed on procedures to follow in case previously unknown archaeological resources are uncovered during construction. Equipment traffic will be minimized in the area of the site. Equipment and materials staging areas will also avoid known archaeological resources.

SOILS

- Excavated soil may be re-used in the construction project; excess soil will be stored in approved areas.
- Accepted erosion protection measures, such as sediment traps, erosion check screens/filters, jute mesh, and hydro mulch, will be used if necessary to prevent the loss of soil.
- Any fill materials will be obtained from a park-approved source and approved by the Park Ecologist.
- The contractors will control dust during construction by minimizing soil exposure, and watering and use of other dust prevention methods.
- To minimize soil erosion at the project site, standard erosion control measures including silt fence and sandbags will be incorporated into action alternatives. Any trenching operations will use a rock saw, backhoe, and/or trencher, with excavated material side-cast for storage. After trenching is complete, bedding material will be placed and compacted in the bottom of the trench and the utility lines installed in the bedding material. Back filling and compaction will begin immediately after the utility lines are placed into the trench and the trench surface will be returned to pre-construction contours. All trenching restoration operations will follow guidelines approved by park staff. Compacted soils will be scarified and original contours reestablished.

- If construction is not complete prior to a winter season, all disturbed areas and soil stockpiles will be protected from snowmelt impacts by using erosion control best management practices and covering dirt piles with impermeable materials.

VEGETATION

- A Revegetation Plan will be developed for the project by park staff. The plan will incorporate, among other things, the use of native species, plant salvage potential, exotic vegetation and noxious weed management, and pedestrian barriers.
- Pre and post-project exotic plant monitoring will also be conducted in the project area. Noxious weed control measures will be implemented and a management plan for continual maintenance will be drafted to monitor and mitigate impacts within the first three years of construction.
- Existing populations of exotic vegetation at the construction site will be treated prior to the beginning of construction activities.
- In an effort to avoid introduction of exotic plant species, only certified weed-free materials will be used for erosion control. Any proposed materials will be reviewed on a case-by-case basis; allowable materials for erosion control may include: rice straw, straws or hay determined by National Park Service to be weed-free purchased from a certified source (e.g., Coors barley straw or Arizona winter wheat straw), cereal grain straw that has been fumigated to kill weed seed, and wood excelsior bales. Standard erosion control measures such as silt fences and/or sand bags may also be used to minimize soil erosion.
- The topsoil will be re-spread in as near as original location as possible, and supplemented with scarification, mulching, seeding, and/or planting with species native to the immediate area. Conserving topsoil will minimize vegetation impacts and potential compaction and erosion of bare soils. The use of conserved topsoil will help preserve micro-organisms and seeds of native plants.
- No vegetation shall be damaged or removed without prior approval via the project documents or by park vegetation management staff.
- Construction workers and supervisors will be provided with tree pruning guidelines. The adherence to these guidelines will minimize damage to trees during project implementation.
- All disturbed areas will be restored as nearly as possible to pre-construction conditions shortly after construction activities are completed. Revegetation efforts will be conducted to facilitate reconstruction of the natural spacing, abundance, and diversity of native plant species.
- Work limits, travel paths and staging areas will be designated and enforced to mitigate impacts to park vegetation. Fencing and barriers shall be used as necessary to restrict contractor operations to these areas.
- Construction should follow best practices for topsoil management, revegetation preparation and revegetation as outlined in the park ground disturbance guide.

- Disturbance zones, construction and staging areas will be fenced or clearly marked to prevent impacts to resources outside the approved construction limits.

WATER RESOURCES

- Accepted erosion protection measures, such as sediment traps, erosion check screens/filters, jute mesh, and hydro mulch, will be used if necessary to prevent the loss of soil.
- Fueling and fuel storage areas will be bermed and lined to contain spills. Provisions will be made (clay or plastic liners) for the containment and disposal of oil-soaked or contaminated soils. Construction equipment will be regularly inspected and maintained to prevent any fluid leaks. Contractors will promptly cleanup any leakage or accidental spills from construction equipment, such as hydraulic fluid, oil, fuel or antifreeze.
- When construction is ended prior to a winter season, all disturbed areas and soil stockpiles will be protected from snowmelt impacts.
- Wetland areas will be avoided when considering areas for construction re-routing and rehabilitation.
- New facilities will be placed as far from the main river as feasible and outside of any side channels.

WILDLIFE

- Construction workers and supervisors will be informed about special status species within the work vicinity. Contract provisions will require the cessation of construction activities if a species were discovered in the project area, until park staff re-evaluates the project. This will allow modification of the contract for any protection measures determined necessary to protect the discovery.
- Under the Migratory Bird Treaty Act, no migratory bird, nest, or egg can be disturbed, removed or destroyed without formal consultation. To minimize the potential for "taking" a nest of any protected bird species, park resource managers will survey the site within a week before ground breaking activities commence to mitigate any potential issues in advance of site construction.
- All contractors, employees, and visitors will be trained and required to comply with the park's bear management plan during construction and operation of the campground facilities. All project staff, trainees, and other personnel will be briefed about food storage needs, and bear safety protocols. Food, fuel, and other attractants will be stored and handled to minimize potential conflicts (i.e. no food, garbage, drink, trash, or food and drink containers are to be placed outside vehicles, trailers, or bear-resistant containers except during times when they are being used).
- Should bald eagle nesting occur within the project area, construction activity will be outside of a one-mile disturbance-free buffer zone around bald eagle nest sites. Monitoring of eagle populations to identify and protect nests will continue.

- Site cleanup will also minimize the likelihood of other animals investigating the area for water and scavenging and will reduce safety concerns related to people coming to the site for unlawful purposes after hours.
- In addition to these general wildlife mitigation measures, wildlife mitigation measures specific to each of the alternatives are provided in the wildlife section of Chapter 3 of this document.

PARK OPERATIONS/VISITOR EXPERIENCE

- Contractors will coordinate with park staff to reduce the potential for disruption of normal park activities. Equipment will not be stored along the roadway overnight without prior approval of park staff. Construction workers and supervisors will be informed about the special sensitivity of park values, regulations, and appropriate housekeeping.
- To minimize the potential for impacts to campground visitors, variations on construction timing will be considered. Options include conducting the majority of the work when the campground is closed or shoulder seasons, limiting the amount of work conducted at any one time during the peak season and implementing daily construction activity curfews. Unless additional time is authorized by park management, operation of heavy construction equipment will not occur between the hours of 7 PM and 7 AM to minimize the impacts of noise from construction activities to campground visitors and the natural quiet.
- Traffic in any one direction will not be stopped for more than 15 minutes to minimize disruption of traffic flow during construction.
- Information regarding implementation of this project and other foreseeable future projects will be shared with the public upon their entry into the park (and campground) during construction periods. Information on the project will be distributed at the entrance station, postings on the park's website, posters on the campground bulletin boards, press releases and/or other methods. The purpose of these efforts will be to minimize the potential for negative impacts to the visitor experience at the Gros Ventre Campground during the implementation of this project and other planned projects during the same construction season.

GENERAL CONSTRUCTION BEST MANAGEMENT PRACTICES

- The construction practices listed below are subject to changes and additions when best management practices are used during construction to mitigate impacts to resources.
- To minimize the amount of ground disturbance, staging and stockpiling areas will be in previously disturbed sites, away from visitor use areas to the extent possible. All staging and stockpiling areas will be returned to pre-construction conditions following construction.
- Parking of construction vehicles will be limited to these staging areas, existing roads, and previously disturbed areas.

- Construction zones will be identified and fenced with construction tape, snow fencing, or some similar material prior to any construction activity. The fencing will define the construction zone and confine activity to the minimum area required for construction. All protection measures will be clearly stated in the construction specifications and workers will be instructed to avoid conducting activities, including material staging and storage, beyond the construction zone as defined by the construction zone fencing.
- The storage, handling, and disposal of all hazardous materials and waste will comply with applicable federal and state regulations. Provisions will be made for storage, containment, and disposal of hazardous materials used on site. To minimize possible petrochemical leaks from construction equipment construction equipment will be monitored frequently to identify and repair any leaks and will be staged in designed areas suitable to contain leaking materials. Trained personnel will clean up and dispose of any leakage or spill from construction equipment such as hydraulic fluid, oil, or fuel. Fueling and fuel storage areas will be permitted only at approved locations and comply with park re-fueling guidelines.
- Fueling and fuel storage areas will be bermed and lined to contain spills. Provisions will be made (clay or plastic liners) for the containment and disposal of oil-soaked or contaminated soils. Construction equipment will be regularly inspected and maintained to prevent any fluid leaks. Contractors will promptly cleanup any leakage or accidental spills from construction equipment, such as hydraulic fluid, oil, fuel or antifreeze.
- Dust generated by construction will be controlled by spraying water on the construction site, if necessary.
- To reduce noise and emissions, construction equipment will not be permitted to idle for long periods of time.
- All construction equipment that will leave the road will be pressure washed before entering the park.
- Contractor will partner with the National Park Service regarding impacts to visitor use during construction activities, while the campground is open to the public.
- The National Park Service will obtain federal and state environmental permits required for this project. As part of the permitting process, other agencies could require additional mitigating measures.

ERRATA SHEETS
GROS VENTRE CAMPGROUND REHABILITATION ENVIRONMENTAL ASSESSMENT
GRAND TETON NATIONAL PARK

Although there were relatively few substantive comments identified, the Response to Substantive comments to the Gros Ventre Campground EA is centered on the following topics: shower facilities, group campsites, RV and bicycle campsites, administrative campsites, natural resources (wildlife, water, night sky, and soundscape), and project timeline. The Substantive Comments section addresses comments received that warranted clarification or explanation. The combination of the EA and the errata sheets form the complete and final record on which the FONSI is based.

CHANGES IN THE ENVIRONMENTAL ASSESSMENT TEXT

Change lines on pages 23 & 25 from *Group Loop (five sites): five group sites for visitor and administrative use, having a combined capacity of 205 people* to *Group Loop (five sites): five group sites for visitor and administrative use, having a combined capacity of 240 people.*

On page 25, change line: *Behind the campground entry station (8 administrative sites): RV sites with full hookups* to *Behind the campground entry station (6 administrative sites): RV sites with full hookups.*

Change lines on page 29 from *Group Loop 5 Sites/175 People* to *Group Loop 8 Sites/200 People.*

Change lines on page 28, from *Additionally, accessible shower facilities for visitor use would be constructed in loop F and shower and laundry facilities would be constructed for administrative use in loop E,* to *Additionally, an accessible shower facility for visitor use will be constructed in near the new Group Loop and one behind the contact station. A new shower and laundry facility will be constructed for administrative use in Loop E.*

Change lines on pages 28 & 29 from *An improved wastewater system would be constructed to serve loops E and F, the relocated group sites, campground office, the administrative sites behind the office, and the dump station would be expanded. New sewer line, septic tanks, manholes, and lift stations would be constructed along with a new leach field. The dump station area would be upgraded and enlarged to accommodate multiple full length RVs at the same time. Access may be realigned to facilitate traffic flow. Additionally, new state required monitoring wells would be constructed to monitor the new leach field* to *An improved wastewater system would be constructed to serve loops E and F, the relocated group sites, campground office, the administrative sites behind the office, and the dump station would be expanded. New sewer line, septic tanks, manholes, and lift stations would be constructed along with two new leach fields: one behind the Contact Station and the other in the field near the easternmost, Loop F Intersection. Two new state required monitoring wells would be constructed to monitor the new leach field in Loops E and F. The dump station area would be upgraded and enlarged to accommodate multiple full length RVs at the same time. Access may be realigned to facilitate traffic flow.*

Several locations in the document state campground operations from late-May to early-October (pp. 77, 78, 80, 85, and 89). The Gros Ventre Campground operating season is early-May through no later than mid-October. The National Park Service may close the campground earlier, based on current management objectives.

RESPONSE TO SUBSTANTIVE COMMENTS

(Note: Names of private individuals submitting comments were withheld. All comments are taken verbatim from comments received.)

Group Campsites

Comment 1: The Preferred Alternative proposes a reduction in the capacity of group campsites. Currently 5 group sites exist allowing for a total capacity of 240 campers (the EA incorrectly reflects 205 campers). The Preferred Alternative reduces this capacity to 175 campers, with only one site having a capacity of over 25 campers. While the campground rarely exceeds 175 total group campers, it is very common for 2+ groups to occupancy sites[sic] at the same time. Advance reservations for the 2009 (as of June 18th) season have 29 nights where 2 or more groups have requested sites for 25+ campers. We have also have[sic] 5 nights where more than 5 total groups sites have been requested and in. We feel that maintaining the current capacity of 240 campers will better meet visitor demand. The current capacity includes two 75 person sites, one 40 person site, and two 25 person sites.

Response: The National Park Service has designed the Group Loop to accommodate up to 200 campers a night. There will be 8 group campsites that will accommodate up to 25 people per site. Two groups of three sites located together, when reserved together, will allow a maximum of 75 campers (25 campers per site). Additionally, two other group sites will be located adjacent to each other, for a maximum of 50 campers.

Comment 2: The "preferred" alternative, not only confines the groups to a smaller overall area, it also places these groups closer to individual sites, where other campers will likely be disturbed.

Response: Although the group campsites will be located closer to individual campsites (Loop F) than the current group site location, the National Park Service believes the distance and road/vegetation buffer will mitigate the potential disturbance.

Shower Facilities

Comment 1: The Preferred Alternative proposes the addition of two separate shower facilities for visitor use. These showers are both proposed to be located at the western end of the campground. No parking is proposed for visitors that are staying at the other end of the campground that wish to shower. Peak occupancy at the campground can total over 1000 campers resulting in upwards of 800 showers per day based upon estimated usage from Flagg Ranch campground (the only area campground with shower included in their facilities). We would like to work with the Service to determine the appropriate shower facilities required for peak demand. After a preliminary assessment, we recommend that shower facilities be located in at least two locations in the eastern part of the campground in close proximity to the majority of campers. The showers should be token or coin operated to control usage and pass the cost of this additional amenity on to those that receive a direct benefit.

Response: Based on this comment, the park will now construct two visitor shower facilities at the campground. One shower facility will be located behind the campground contact station and one adjacent to the Group Loop. There is adequate parking available at both locations. This plan does not address public shower facilities on the east end of the campground, as this area does not have adequate infrastructure to accommodate showers. The aging system and design, as well as the current water and sewer capacity, limits the ability for such improvements. If it found there is a demand for additional showers at the east end of the campground, the National Park Service may consider it, but further planning/compliance will be necessary.

Comment 2: The Preferred Alternative locates a shower facility just off of the main campground road. This places it in a location where it is not removed from visitor areas. Co-locating shower facilities in the same building proposed to accommodate employee laundry facilities will remove this from guest areas and potentially reduce the impact. We support the addition of an employee shower and laundry facility.

Response: The park will construct shower and laundry facilities within Loop E for administrative use only.

Visitor Campsites

Comment 1: The Preferred Alternative does not specifically address any site improvements. The Gros Ventre Campground does not have any pull through sites able to accommodate RVs and many of the current sites are too small to accommodate today's larger units. 17 sites that are identified for electrical hook-ups are too small for the majority of recreational vehicles. We recommend the development of pull through sites and/or expansion of the existing parking pads where feasible.

Response: The National Park Service agrees some of the sites in Loop D may need expansion to accommodate larger RVs and will collaborate with the concessioner to identify appropriate sites for small-scale expansion in order to meet the size requirements. Impacts from the potential expansion of any sites in Loop D will not exceed those identified in the EA.

However, conversion of Loop D campsites from drive-in or back-in sites, to pull-through sites would require additional planning and compliance, as this would cause greater resource impacts not considered in this EA.

Comment 2: I would encourage the development of a bicycle camping area complete with wildlife-proof food lockers on a portion of the proposed area to be vacated such as in loop F/G campsights [sic] or other area such as the amphetheater [sic] parking area which will also be altered as part of this plan.

Response: All tent sites may be used for both vehicle and bicycle campers. It is the National Park Service's goal to provide wildlife-proof food lockers in all the campsites within Grand Teton National Park. As these are expensive, the park is installing them as funds become available.

Comment 3: In terms of demand for campsites, when perusing the www.nps.gov/grte website it indicates that the Colter Bay campground (the other campground with a dump station) doesn't always fill, so I wonder as to why there is a demand for more RV sites, if the current facilities are not always full. In the meantime the Jenny Lake tent only campground routinely fills very early in the morning and seems to indicate that there are tenters searching for alternative campsites. Again, the proximity of Gros Ventre to Jackson Hole with multiple dump station options at RV campgrounds seems to perhaps cover some of the demand for both dump stations and electrical hookup RV sites in the southern portion of the park.

Response: It is difficult to compare Jenny Lake Campground with the Gros Ventre Campground regarding tent camping/visitor use. Not only is the Jenny Lake Campground much smaller than other campgrounds in the park, it generally attracts a different type of visitor than other campgrounds, such as climbers and hikers, looking for tent camping within close proximity to park trailheads and mountaineering. From May to October, the Gros Ventre Campground attracts 20-50 percent more RV users than tent campers. Many of these users request similar

amenities to those offered at the Colter Bay Campground, which serves the northern portion of the park.

Not only do the private RV campgrounds located in Jackson frequently fill during the peak season, they are also located in an urban setting, much different from those within Grand Teton National Park. Therefore, it is difficult to compare the two and surmise the town campgrounds would meet RV user demands.

Administrative Campsites

Comment 1: The EA it is discussed that unanimous opinion preferred separating the administrative housing area from the visitor campsites, yet the administrative sites have been placed in the middle between two sections of visitor campsites (Loop F disconnected from the other visitor sites in loops A-D, with administrative in Loop E). If it is due to the need for electricity and proximity to the entrance station area, it seems that at the least it would be more logical to place the electrical hookup only sites in Loop F, then the administrative in Loop E and the tent/RV no hookup sites in A-D, rather than the current proposal placing the electrical hookup sites in Loop D and the tent/RV no hookup sites in loops A-C and F.

Response: Loop E currently has 10 administrative, full service hook up sites and associated infrastructure. The park determined it was more efficient and cost effective to add more administrative sites to the loop, rather than develop a new administrative site loop. In addition, resource impacts would be lower by adding to the existing loop.

With regard to distance from visitor campsites, the park has not received complaints this far, but would consider other options if future conditions warrant.

Comment 2: The greatest potential for impacting both visitors and habitat is the large increase in administrative sites. We are concerned about the use of these sites by concessioner employees that are not working within the park. Sites have been designated in the EA to be "... used by park, partner, and concessioner employees and volunteers who are critical to park operations."(EA:5) The availability of these sites should be restricted to GTNP seasonal employees and concessioner and partner employees who are directly working in the park.

Response: As stated in the EA, the Gros Ventre Campground administrative campsites are to be used by park, partner, and concessioner employees and volunteers who are critical to park operations based in the southern areas of the park. This has been (and will remain) the policy for these campsites.

Road

Comment 1: Every effort should be made to widen the shoulder areas of the campground approach road (Gros Ventre Rd.) from Rt 89.

Response: The National Park Service believes current width of the Gros Ventre Campground entrance road and the 15 mile per hour speed limit is adequate for current campground traffic. Widening of the Gros Ventre road was not considered in the EA.

Project Timeline

Comment 1: When are the proposed changes slated to occur? How long will it take to complete the project? Which loops are intended for closure?

Response: Gros Ventre Campground EA project implementation will be phased as funding becomes available. Some aspects of the project may be funded with construction beginning as early as fall 2009 and/or spring 2010. Other phases may take several more years to be funded and implemented.

The loops intended for closure include the existing Group Loop, Loop G, and their related access roads.

Environmental Justice/Cost Structure

Comment 1: How will if [sic]affect price structure?

Response: The Park anticipates the campground fee structure will be same at the campground after project completion as other campgrounds in the park, such as Colter Bay. Rates are pursuant to National Park Service policy, which bases prices on comparability with similar facilities/services in the region. These rates are then approved by the Superintendent.

Comment 2: I am also concerned about the decision to dismiss environmental justice from the analyzed impact topics since many of the campground improvements (shower facilities, laundry facilities, electric hook-ups etc.) could all be grounds for charging a higher price and thus excluding lower income visitors from the campground. More infrastructure commands more maintenance and therefore more cost passed onto the consumer in this case the campground user.

Response: Agency responsibility under Executive Order 12898: Environmental Justice, is to identify and address, "...as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States and its territories..." This project will not have a disproportionately high or adverse human health or environmental effect on any population.

The National Park Service anticipates the fee structure for the Gros Ventre Campground will be aligned with rates of other campgrounds in the park such as Colter Bay Campground. With this structure, the visitor pays only for the amenities they use. Currently Colter Bay Campground, which offers a variety of campsites, charges the same for tent/non-hook up camping as the Gros Ventre campground. Campers at Colter Bay pay more for hook up sites only. Showers are available at an additional fee for those who chose to use them.

Lightscape and Soundscape

Comment 1: Lightscape and soundscape effects were dismissed due to the fact that the improvements "would not measurably increase artificial light sources into the environment..." and "sound generated...would most likely be beneficial...and would not result in any unacceptable impacts...". While I concur that the mitigation techniques discussed would certainly help reduce both impacts, I wonder at how much increase in both would occur due to electricity being available to RVs and potentially tents as well as an larger presence of "semi-permanent" administrative living quarters and their associated needs.

Response: The National Park Service agrees there may be a slight increase in artificial light and sound generated in three areas (Loop E, D, and a small portion of the East Corridor Road) due to the campground rehabilitation. It is anticipated with the closure of the west end of the

campground and other mitigation factors in place, the potential increases will be negligible to minor, therefore, the topics were dismissed from further evaluation in the EA.

Water

Comment 1: I fear that these amenities might lead to the need for ever [sic]expanding water demands as well as sewage treatment, in an area that has already been determined to have some potential flooding (100 year floodplain) and other water quality, safety issues. Limiting both the amount of water being drawn from the wells as well as limiting the amount of wastewater being produced seems prudent and forward thinking.

Response: Upgrading and replacing infrastructure will assist in ensuring continued safe water and wastewater conditions in the campground. Systems that are more efficient will inherently use less water, as well as be substantially less prone to system failure, leakage, and/or waste.

Existing infrastructure will also be removed from the flood-prone areas improving operational efficiency and alleviating the potential for river/groundwater contamination. The removal of infrastructure from the flood prone areas, as well as reducing the overall footprint and impervious surface of the campground, will result in fewer operational emergency actions and increased natural resource benefits.

Vegetation

Comment 1: The combined infrastructure improvements would remove 35 percent of the mature cottonwood trees from Loop E without replacement. Limited, but existent, cottonwood regeneration is present in Loop E." (EA:56). The removal of 198 trees would appear to have a greater impact than stated in the EA. We would like to see a concerted effort to retain as many trees as possible and the evidence of cottonwood regeneration is encouraging. This riparian habitat exemplifies the high quality habitat that should be the standard for the park. We would offer that in addition to depending upon natural regeneration of trees, the park also plant trees within this area. We would also recommend shifting the location of the leach field to avoid the removal of trees at that site.

Response: The removal of 198 trees (primarily cottonwood) was the maximum number of tree removal predicted for the entire project, throughout the campground. This included tree removal from original leach field plan in the EA. As stated in this FONSI, new sewer lines, septic tanks, manholes, and lift stations would be constructed along with two new leach fields: one behind the Contact Station and the other in the field near the easternmost, Loop F Intersection. This new proposal will lessen the vegetative impacts of installation. It is anticipated that placement of both of these leach fields could occur in areas that do not require tree removal.

Comment 2: "Disturbances associated with the proposed campground rehabilitation are likely to exacerbate exotic species problems." (EA:54) This project will encompass an extensive area of disturbance with the possibility of introduction or spread of non-native and/or invasive plant species. We would greatly encourage the highest compliance with your mitigation measure to eliminate this threat to habitat and wildlife.

Response: The National Park Service agrees there is a threat from the spread of exotic species due to the project. Exotic treatment/management will take place before, during, and after construction. All mitigation measures listed in this FONSI will be strictly adhered to.

Wildlife

Comment 1: We have concerns that the proposed project may impact management of the Jackson elk and bison herds. The Record of Decision for the Jackson Bison and Elk Management Plan for the National Elk Refuge and Grand Teton National Park sets a population goal of 1,600 elk summering in Grand Teton National Park and 500 wintering bison. To reach this population level it is critical that the elk reduction program in the Park and the bison and elk hunt on the Refuge are not impacted by this project. In the past the agencies voiced concerns regarding visitor services at the campground and as a result, some of the hunt area on the refuge was closed and the opening date of the reduction hunt in the park was delayed because of the campground. We recommend the campground close by the end of September so the elk reduction program and bison hunt are not impacted by visitor services and the administrative sites at the campground.

Response: The Gros Ventre Campground operating season is early-May through no later than mid-October. The National Park Service may close the campground earlier, based on current management objectives. The National Park Service is trying to strike a balance between competing issues, including public safety, visitor services and wildlife management. The park has worked closely with the Wyoming Game and Fish to agree on an opening date for the park's Elk Reduction Program which is currently on or about the second Saturday in October. The campground closing date proposed in the EA would allow the opening of the ElK Reduction Program to remain in early October.

Campground Season

Comment 1: The seasonal use of the campground should remain at the current late May to early October schedule. This season should not be extended, nor should the campground be used for permanent housing for employees.

Response: As stated in Section 2.5 (p.31) due to wildlife, human safety, and park operations, the extension of the season, as well as providing permanent housing in the campground, is currently not being considered.