

National Park Service
U.S. Department of the Interior



Grand Teton National Park
Wyoming

MOOSE HEADQUARTERS REHABILITATION – SITE WORK FINDING OF NO SIGNIFICANT IMPACT

BACKGROUND

Moose, Wyoming is the center for park operations within Grand Teton National Park with more than 75 percent of park employees duty stationed there. The Moose Headquarters Area includes the park headquarters, visitor use areas, and administrative and maintenance facilities. The Moose Headquarters Area is bordered to the west by National Park Service (NPS) employee housing, to the east by the Snake River and associated river access, and to the south by Teton Park Road, which is a primary park access road used by both employees and the general public. The Craig Thomas Discovery and Visitor Center, the only year-round visitor center within the park, is located south of the Moose Headquarters Area across Teton Park Road.

Several conditions exist in the Moose Headquarters Area that are not optimal for park visitors, employees or park operations. Use of the Moose boat landing area by commercial river operators and the general public has increased dramatically in recent years. This area often becomes congested due to inappropriate overflow parking by concessioner clients and heavy concessioner traffic. Vehicle traffic can be congested and confusing and can spill over into the administrative area resulting in safety hazards and a negative experience for those who use the area. Site improvements are needed at the Moose Headquarters Area to address conflicting vehicle and pedestrian flow caused by non-segregated use and traffic congestion as well as damage to natural resources due to inadequate way-finding, user-created trails, and deficient stormwater management.

The NPS recently prepared an Environmental Assessment (EA) to analyze the effects of a proposal to conduct site improvements to the Moose Headquarters Area. The EA was prepared to identify project issues and develop alternatives to address concerns related to the site improvements. The purpose of the proposal is to upgrade and improve site conditions in a way that enhances visitor experience while providing a safe, healthy, functional, and efficient working/living environment for park employees and their families. Actions addressed in the EA include segregation of incompatible uses throughout the site; providing for safer and more efficient pedestrian and vehicle traffic within the administrative area for employees and residents and within the Moose landing area for visitors and concessioners; improving the interpretive experience for visitors in the Moose area; reducing the built environment in the Moose Headquarters Area; and resolving stormwater management deficiencies to protect vital water resources. Resource concerns evaluated in the EA include water resources, vegetation, soils, wildlife, visitor use and experience, and park operations.

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

SELECTION OF THE PREFERRED ALTERNATIVE

Alternative B – Moose Headquarters Site Work is the NPS preferred alternative, because it meets the purpose and need for the project as well as the project objectives to:

- Segregate incompatible uses throughout the site.
- Provide for safer and more efficient pedestrian and vehicle traffic within the administrative area for employees and residents.
- Provide for safer and more efficient pedestrian and vehicle traffic within the Moose landing area for visitors and concessioners.
- Improve the interpretive experience for visitors in the Moose area.
- Resolve stormwater management deficiencies to protect vital water resources.
- Reduce the built environment in the Moose Headquarters Area.
- Produce no unacceptable impacts or impairment as a result of this project.

The preferred alternative will guide management and development of the site conditions at the Moose Headquarters Area over the next 15-20 years. The main focus of the preferred alternative is to improve site conditions at the Moose Headquarters Area while providing for visitor enjoyment of the area's natural and cultural resources. The proposed site design attempts to accommodate all of the user needs (visitors, concessioners, residents, employees, park operations) in a safe and effective manner and to accommodate park needs well into the future. The preferred alternative addresses: segregation of operations/administrative and public/visitor use areas; segregation of vehicles and pedestrians; employee and visitor parking and traffic flow/circulation; redesign of vehicle flow patterns to and from visitor and concessioner boat landing areas; landscaping and visual screening of the administrative area; improved stormwater management; and resource protection.

Vehicle and pedestrian traffic patterns will be reconfigured and existing parking areas will be modified to better serve employees, visitors, and concessioners. Reconfiguration of the parking areas and changes in access will segregate visitors and concessioners from administrative functions and traffic in the Moose Headquarters Area. Traffic patterns adjacent to the existing boat landings will be improved to allow for safe, orderly access to the river.

A new, designated parking area for concessioner clients, complete with an associated picnic/waiting area and restroom facilities, will be added to improve separation of visitor vehicles and pedestrians from concessioner vehicles and to discourage pedestrians from crossing into vehicular traffic. A comprehensive sign program will be installed throughout the Moose Headquarters Area to communicate pedestrian and vehicle traffic patterns and segregate use areas.

A new interpretive trail will be added to provide pedestrians a designated walkway to return to their vehicles after leaving the boat landing area. Signs will be installed to notify users to stay on the trail, help visitors get to their destination, and to provide interpretive information. Redundant ancillary user-created trails will be restored to native vegetation as appropriate. The trail will traverse the riverside area, outside of traffic lanes, with designated crossing points, and provide connectivity between Menor's Ferry, the multi-use/bicycle pathway, and the Craig Thomas Discovery and Visitor Center. This trail will extend north of the Moose Headquarters Area to replace an existing user-created trail that leads to existing asphalt trails within the Menor's Ferry Historic District. A multi-use residential trail will also be created, providing linkage between the Post Office and the main park multi-use pathway, Headquarters Road, and the employee housing area.

There will be nearly complete replacement of existing asphalt to provide positive drainage along with a reconfiguration of drainage patterns. Concrete drainage features will be provided with the maximum possible percentage of runoff from paved areas forced through new oil-water separators. Several sediment and infiltration basins will be constructed to allow stormwater to filter into the ground and multiple bio-swales will be constructed to treat surface water runoff. A gravel trench will be constructed between the Moose Landing Road and the vegetation to facilitate sediment filtration prior to flow into the river. The new basins and improved contouring of the area will promote positive drainage (drainage from high to low areas) and reduce the amount of runoff to the adjacent Snake River. Five functionally and energy-inefficient temporary modular buildings will be removed resulting in a reduction in overall building space in the Moose Headquarters Area.

MITIGATION MEASURES

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

CULTURAL RESOURCES

- Consultation with the Wyoming State Historic Preservation Office (SHPO) was conducted with a letter of concurrence of “no historic properties affected,” received on January 8, 2010.
- Should construction unearth previously undiscovered archaeological resources, work will be stopped and park staff will consult with the Wyoming SHPO, Tribal Historic Preservation Officers and/ or tribes, as necessary. In the unlikely event that human remains are discovered during implementation, provisions outlined in the Native American Graves Protection and Repatriation Act will be followed.
- The NPS 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

- To minimize soil erosion at the project site, erosion control best management practices (BMPs) including protection measures such as sediment traps, silt fences, erosion check screens/filters, jute mesh, and hydro mulch, will be used if necessary to prevent the loss of soil. Compacted soils will be scarified and original contours reestablished.
- Excavated soil may be re-used in the project; excess soil will be stored in approved areas.
- 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, watering, and use of other dust prevention methods.
- 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 BMPs and covering dirt piles with impermeable materials.

VEGETATION

- A revegetation plan will be developed for the project that will incorporate, among other things, the use of native species, plant salvage potential, exotic vegetation and noxious weed management, and pedestrian barriers to prevent establishment of user-created trails. The plan will incorporate screening of the warehouse and works yard as well as other structures and parking areas. Revegetation efforts will include reconstruction of the natural spacing, abundance, and diversity of native plant species.
- Natural groupings of vegetation, rocks, or other natural features will be used for screening, as appropriate. Local native species will be used and there will be no irrigation needs beyond establishment.
- All areas disturbed by rehabilitation activities will be revegetated and re-contoured as nearly as possible to the style of the native landscape shortly after activities are completed. Existing trees will be preserved to the extent possible; however, a few trees will likely be removed.
- Construction will follow BMPs for topsoil management, revegetation preparation and revegetation as outlined in the park ground disturbance guide.
- Disturbance zones and construction and staging areas will be fenced or clearly marked to prevent impacts to resources outside the approved construction limits.
- Pre- and post-project exotic plant monitoring will 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 3 years of construction.
- Existing populations of exotic vegetation at the site will be treated prior to the beginning of 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, straw or hay determined by NPS 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.
- The topsoil will be re-spread in as near to the 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 to minimize damage to trees during project implementation.
- 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.

WATER RESOURCES

- A Stormwater Pollution Prevention Plan (SWPPP) will be developed as part of the construction plans to provide engineering methods and techniques specific to the finalized

design drawings that will minimize erosion and degradation of soils in the project area during both construction and use of the area.

- Accepted erosion BMPs, 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 clean up 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.
- New disturbance will be as far from the river as feasible.

WILDLIFE

- On January 26, 2010, the NPS received concurrence from the USFWS on the NPS Section 7 determination of may affect, not likely to adversely affect the gray wolf, yellow-billed cuckoo, or grizzly bear.
- Construction workers and supervisors will be informed about the potential for special status species within the work vicinity. Contract provisions will require the cessation of construction activities if a special status species was 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. To minimize the potential for “taking” a nest of any protected bird species, park resource managers will survey the site before ground breaking activities commence to mitigate any potential issues in advance of site construction. Additional surveys will be conducted if the project duration occurs during the bird breeding period (May 1-August 1).
- All contractors and employees will be trained and required to comply with the park’s bear management plan and food storage regulations during rehabilitation activities. 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 (*Haliaeetus leucocephalus*) nesting occur within the project area, some modification of construction activity may be required depending on the location of the nest. Mitigations to reduce eagle disturbance due to related project activities would be evaluated and potentially implemented. Monitoring of eagle populations to identify and protect nests would continue and be reassessed throughout the project duration to ensure protection to nesting eagles.
- If roosting bats are found in buildings, rehabilitation work on those structures will be delayed until after the roosting period.

PARK OPERATIONS/ VISITOR EXPERIENCE

- Contractors will coordinate with park staff to minimize disruption of normal park activities. 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 concessioners and visitors, variations on construction timing will be considered. Operation of heavy construction equipment will generally occur between the hours of 7 AM and 7 PM to minimize the impacts of noise from construction activities to park visitors and the natural quiet.
- Information regarding implementation of this project and other foreseeable future projects will be shared with the public upon their entry into the park (and the Moose Campus) during construction periods. This may take the form of an informational brochure or flyer about the projects distributed at the gate, postings on the park's website, posters on bulletin boards, press releases and/ or other methods. The purpose of these efforts will be to minimize the potential for negative impacts to visitor experience at the Moose Headquarters Area during implementation of this project and other planned projects during the same construction season.
- Prior to construction, an informational meeting with concessioners, project managers, and business resources staff will take place to educate concessioners on any changes to traffic flow, and any other anticipated issues that may take place in the next few years during construction. All park personnel will be educated on the changes expected in the Moose Headquarters Area for the next few years. Traffic control and education will be implemented for crossing over the concessioner route into the wash bay building.
- A traffic control plan for use during construction as approved by the park will be developed and enforced to minimize disruption to visitors and park operations and to ensure safety of the public, park employees, and residents.

GENERAL CONSTRUCTION BEST MANAGEMENT PRACTICES

The construction practices listed below are subject to changes and additions when BMPs are used during construction to mitigate impacts to resources.

- To minimize the amount of ground disturbance, staging and stockpiling areas will be located in previously disturbed sites, away from visitor use areas to the extent possible. All staging and stockpiling areas 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 material 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, all equipment will be monitored frequently to identify and repair any leaks and will be staged in designated 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 clean up any leakage or accidental spills from construction equipment, such as hydraulic fluid, oil, fuel or antifreeze.
- The NPS contract will include specific provisions and implementation measures to prevent Storm Water Pollution during construction activities, in accordance with the Clean Water Act, the National Pollution Discharge Elimination System permit program, and all Federal, State, and local regulations, and in accordance with the Storm Water Pollution Prevention Plan to be prepared for this project, to include dust control measures. The Contractor will be provided a copy of EPA document EPA 832-F-99-003- Storm Water Management Fact Sheet-Dust Control and will be required to submit a dust control plan prior to construction.
- To reduce noise and emissions, construction equipment will not be permitted to idle excessively. Contractors will be required to work with NPS to devise procedures to eliminate unnecessary idling.
- All construction equipment that has the potential to leave paved areas will be pressure washed before entering the park.

ALTERNATIVES CONSIDERED

Two alternatives were evaluated in the EA including Alternative A (No Action) and Alternative B (Moose Headquarters Site Work). Alternative B, the preferred alternative (proposed action) was selected after a careful review of public comment and impacts to natural and social resources.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

Alternative B is the environmentally preferred alternative. The environmentally preferred alternative is the alternative that will promote the national environmental policy as expressed by §101 of NEPA. 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 is the environmentally preferred alternative because it best addresses these six evaluation factors. The comprehensive rehabilitation of the site will mitigate existing safety

hazards; eliminate current conflicts between administrative, commercial and public uses; and provide protection for hydrologic, soil, and vegetative resources and an improved visitor experience in a manner that better accommodates future increases in public use and protects the resources for future generations.

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.

No significant effects were identified as part of the analysis for this project. Minor, short-term adverse impacts of the preferred (selected) alternative are associated with construction-related disturbances to both the visitor and resources. Effects to wildlife resources will be long-term, adverse, and negligible to minor. Effects to visitor use and experience will be short-term, local, minor, and adverse and long-term, local, moderate, and beneficial. Effects to park operations will be local, moderate, adverse and short-term and local, moderate, beneficial, and long-term. Mitigation measures proposed will alleviate these short- and long-term impacts. Once completed, the improvements will have long-term, beneficial impacts for resources, visitors, and park operations.

Degree of effect on public health or safety.

Public health and safety was analyzed in the EA under the impact topic Visitor Use and Experience. The comprehensive rehabilitation of the site under the preferred (selected) alternative will provide safer landing conditions for motor vehicles and boat trailer traffic and reduce current conflicts between administrative, commercial, and public uses in the Moose maintenance, headquarters and boat ramp area. Reconfiguration of the Moose Headquarters Area parking and vehicular traffic flow, including outfitter/ passenger parking and staging areas, will mitigate existing safety hazards. The installation of new pedestrian trails will provide a safe route for visitors traversing the area. The improvements to stormwater management associated with Alternative B will indirectly affect employee/park operations safety by reducing slipping hazards during the winter season. Effects on the health and safety of employees and visitors will be long-term, local, moderate, and beneficial. Implementation of the preferred alternative will ensure that existing 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, the Moose Headquarters Area was inventoried for cultural resources in 1990 and no archaeological sites, artifacts, or features were identified. Because the project will not disturb any known archaeological sites, the effect of the project on archaeological resources is expected to be negligible with a no effect determination under Section 106 of the National Historic Preservation Act.

The Moose Headquarters Area is adjacent to a reach of the Snake River that was recently included in the National Wild and Scenic Rivers System, but no ground disturbance will occur on the river banks. BMPs will be implemented to minimize the potential for erosion or

sedimentation to the river channel. There will be no measurable effects to those resources for which the river was designated.

There are no prime or unique farmlands, wetlands, or ecologically critical areas present within the project area.

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 and improving site conditions in a way that enhances visitor experience while providing a safe, healthy, functional, and efficient working/living environment for park employees and their families. Actions proposed under the preferred alternative will utilize standard construction and operation techniques, BMPs 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 is not expected to set a precedent for future actions with significant effects, nor does it represent a decision in principle 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. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small components.

Cumulative impacts were analyzed in the EA and no significant cumulative impacts were identified.

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 Moose Headquarters Area was inventoried for cultural resources in 1990 and no archaeological sites, artifacts, or features were identified. The NPS determined that no historic properties will be affected. Compliance with §106 of the National Historic Preservation Act was completed with concurrence of this determination by the Wyoming SHPO on January 8, 2010.

Degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.

In June 2008, the park sent scoping letters to the United States Fish and Wildlife Service (USFWS), Wyoming Ecological Services Office, and Wyoming Game and Fish Department (WGFD) notifying them of the proposed project. Neither the USFWS nor the WGFD identified any concerns related to threatened and endangered species during the scoping period for this project.

The park is utilizing the EA as the consultation document pursuant to Section 7 of the Endangered Species Act (ESA). Mitigation measures listed in the EA on page 38 are part of the consultation and will be followed to protect these species. The EA provides an impact determination for each federally listed species present in the park. The impact determinations as defined under Section 7 of the ESA include no effect; may affect, not likely to adversely affect; and may affect, is likely to adversely affect. On January 26, 2010, the NPS received concurrence from the USFWS on the NPS Section 7 determination of may affect, not likely to adversely affect the gray wolf, yellow-billed cuckoo, or grizzly bear.

Whether the action threatens a violation of Federal, state or local law requirements imposed for the protection of the environment.

This action violates no federal, state, or local laws or 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. All proposals for park uses are evaluated for: consistency with applicable laws, executive orders, regulations, and policies; consistency with existing plans for public use and resource management; actual and potential effects on park resources and values; total costs to the NPS; and whether the public interest will be served.

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

NPS has the management discretion to allow certain impacts within parks; however, park resources and values must be left unimpaired, unless a particular law directly and specifically provides otherwise. The prohibited impairment is an impact that, in the professional judgment of the responsible NPS manager, will harm the integrity of park resources or values. The impact threshold at which impairment occurs is not always readily apparent. Therefore, the NPS applies a standard that offers greater assurance that impairment will not occur. This involves avoiding impacts that the NPS determines to be unacceptable; that is, they fall short of impairment, but are still not acceptable within a particular park's environment. Because park managers cannot allow uses that will cause unacceptable impacts, they must evaluate existing or proposed uses and determine whether the associated impacts on park resources and values are acceptable. Because the application of design of the preferred alternative and the implementation of mitigation measures are expected to be successful in ensuring that no major adverse impacts will occur and that satisfactory rehabilitation of the disturbed area is expected to be achievable, implementation of the preferred alternative will not result in any unacceptable impacts.

In analyzing impairments as part of the NEPA analysis, 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 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’ 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 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 NPS policy and guidance, and the Grand Teton National Park Master Plan (1976) and other related park plans. Although the plan/project has some adverse impacts, in all cases these impacts are the result of actions taken to preserve and restore other park resources and values. Overall, the plan results in net benefits to park resources and values, and opportunities for their enjoyment, and it does not result in impairment.

PUBLIC INVOLVEMENT

Public scoping was conducted to inform various agencies and the public about the proposal to rehabilitate the Moose Headquarters Area and to generate input on the preparation of the EA. The scoping letter was mailed in June 2008 to more than 800 individuals, organizations, federal and state agencies, affiliated Native American tribes, local governments, and local news organizations. During the 30-day scoping period one agency and four public responses were received.

In January 2010, a postcard listing the availability of the EA and its posting to PEPC for review was sent to approximately 600 individuals on the park core mailing list. In addition, approximately 70 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 February 9, 2010. A total of nine responses were received with the majority of the comments relating to traffic flow and parking and the boat launches and landings, the latter of which are out of the scope of this EA. Other comments were related to snow storage, temporary buildings, restrooms, mitigation measures, visitor enjoyment, segregation of incompatible uses, aquatic invasive species, wildlife, and air quality.

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 localized adverse impacts that range from short- to long-term, and negligible to moderate. Beneficial effects are also expected and will be long-term and minor to moderate. There are no unmitigated adverse effects on 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.

Approved:

Michael D. Dyer
Director, Intermountain Region

2/16/10
Date

ERRATA SHEETS

MOOSE HEADQUARTERS REHABILITATION – SITE WORK ENVIRONMENTAL ASSESSMENT GRAND TETON NATIONAL PARK

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

On page 4, change *‘Concession operation vehicles depart the boat landing area and concessioner parking area by traveling through the administration facility...’* to *‘Concession operation vehicles depart the boat landing area and concessioner parking area by traveling on the Headquarters Road...’*

On pages 10-11 in the Cumulative Action Scenario, add *“Snake River Comprehensive River Management Plan: This plan will be developed to address management and guidance for the newly designated Wild and Scenic River segments of the Snake River within Grand Teton National Park. The Craig Thomas Snake Headwaters Legacy Act of 2008 was passed by Congress and signed by the President in spring of 2009 and requires the development of a comprehensive river management plan to identify the outstanding remarkable values (ORVs), management issues and concerns and visitor use capacities, and an analysis and description of the availability and compatibility of future development with the wild and scenic character of the river segment(s). This plan will also include an analysis of existing river visitor use facilities and boat landing/ramp areas along the Snake River in Grand Teton National Park.”*

On Figure 8, page 31, remove *“Concessioner Rigging Zone.”*

On page 36, in the wildlife mitigation measures, replace *“Should bald eagle (*Haliaeetus leucocephalus*) nesting occur within the project area, construction activity would cease within ½ mile of the nest and not continue until after August 15 (the end date of closures instated to prevent nest disturbance) unless the nest failed before that date. Monitoring of eagle populations to identify and protect nests would continue and be reassessed throughout the project duration to ensure protection to nesting eagles,”* with *“Should bald eagle (*Haliaeetus leucocephalus*) nesting occur within the project area, some modification of construction activity may be required depending on the location of the nest. Mitigations to reduce eagle disturbance due to related project activities would be evaluated and potentially implemented. Monitoring of eagle populations to identify and protect nests would continue and be reassessed throughout the project duration to ensure protection to nesting eagles.”*

On page 38, in the General Construction Best Management Practices, replace *“Dust generated by construction would be controlled by spraying water on the construction site, if necessary,”* with, *“The NPS contract will include specific provisions and implementation measures to prevent Storm Water Pollution during construction activities, in accordance with the Clean Water Act, the National Pollution Discharge Elimination System permit program, and all Federal, State, and local regulations, and in accordance with the Storm Water Pollution Prevention Plan to be prepared for this project, to include dust control measures. The Contractor will be provided a copy of EPA document EPA 832-F-99-003- Storm Water Management Fact Sheet-Dust Control and will be required to submit a dust control plan prior to construction.”*

On page 38, delete the water quality mitigation measure which stated “Hazards associated with development in the defined regulatory floodplain would be considered in the design and construction specifications would encourage a work window during low flow.”

RESPONSE TO SUBSTANTIVE COMMENTS

In some instances where there were multiple comments related to the same topic the comments are summarized. Where whole comments are included they are presented exactly as written.

Topic #1: Boat Landings/Ramps

Comment 1-1: Several commentors discussed the condition of the boat ramps/landings at Moose and stated that improvements were needed to address safety and functionality of the structures.

Response: The project area analyzed in this EA ended at the high-water mark of the Snake River; therefore, the boat ramps and landings are out of the scope of the EA. Boat landings and boat ramps within Grand Teton National Park, including those adjacent to the project area at Moose, will be comprehensively evaluated in the upcoming Snake River Comprehensive River Management Plan. This plan will be designed to address management of the newly designated Wild and Scenic River segments of the Snake River within Grand Teton National Park. The plan will include an assessment of existing boat landings and other river facilities to determine whether any improvements may be needed. Public scoping for this plan is expected to begin in late 2010. Comments submitted on this EA that are applicable to that planning process will be forwarded to the planning team developing the Snake River Comprehensive River Management Plan so that these issues/suggestions can be considered early in the process.

Comment 1-2: Prior to all other construction, I strongly urge the Park Service to address and rectify the inadequate and dangerous conditions of the Moose Landing #1 ramp site. The present faulty ramp extension has exacerbated landing problems rather than alleviated them. I request that the flat ramp extension at Moose Landing #1 be removed, either this winter or spring, prior to rising river levels. This ramp has only accentuated the ramp toe undercutting, made loading boats on trailers extremely difficult, and has caused more bent or broken trailer axles and/or springs than the original, properly-angled (sloped) upper portion of the ramp. This original upper portion is cracked and deteriorating due to weathering as it has had no patching maintenance. The ramp needs to be widened, preferably by at least two additional ramp widths. This would allow for two take-out slips and one slip for launching.

Response: As previously noted, this area is out of the scope of this EA and the NPS will be examining ramp and landing issues during the Snake River Comprehensive River Management Plan. However, if this ramp is considered by the NPS to be unsafe, or in need of emergency repair, it will be evaluated in a timely manner under separate NEPA compliance.

Comment 1-3: Several comments addressed unsafe walking conditions along the river's edge below the high water mark, where concessioner clients have to travel from boats to the new interpretive trail. Commentors stated that many float trip patrons are unable to walk unassisted because of steep banks and loose cobble.

Response: As stated above, all areas below the high water mark are out of the scope of the EA. However, the NPS will provide an improved, but unpaved foot path that parallels the river's edge, above the ordinary high water mark. This path will provide safer egress from the boat landing area, access to the new proposed restroom facilities, and a connection to the main interpretive trail. Other existing user created trails in the immediate area will be eliminated and restored to native

vegetation. Work below the high water mark will be addressed in the Snake River Comprehensive River Management Plan; however, if there are safety concerns that need to be addressed prior to completion of that plan they will be addressed in separate NEPA compliance in a timely manner.

Topic #2: Traffic Flow and Parking

Comment 2-1: Several comments were received referring to the “concessioner rigging zone” in Figure 8 and the meeting area. Topics included proposed traffic patterns, rigging location, parking, and separation of rigging from meeting location.

Response: NPS feels that the new situation as proposed in the EA creates safer conditions for use of the area due to greater separation between visitor and concessioner use areas. A formal sign plan will be developed by an interdisciplinary team with representatives from NPS, traffic engineers, law enforcement, concessioners, interpretation, and others as applicable. The interdisciplinary team will work to develop signs which effectively communicate the traffic flow and use areas. As stated under Changes to Environmental Assessment Text above, the ‘Concessioner Rigging Zone’ label will be eliminated on the drawing on page 31.

Comment 2-2: The Float Trip Meeting Area should continue to have a clock-wise traffic circulation. Most outfitters, if meeting clients there, access the area by driving in from the Teton Park Road via the four-way intersection opposite the entrance to the new Moose Visitor Center. Clients await their choice of float trip outfitters at the current meeting place island. We outfitters drive up alongside the curb of the island to meet and load up our clients, usually with 15-passenger vans, all of which have side-loading doors on the passenger side (curb side). Therefore, it is essential that the island be accessed for parking and loading passengers from a clock-wise traffic pattern.

Response: The clockwise traffic flow has worked well in past years, due to the client parking on the west side of the island. As this will be replaced with a new and dedicated lot to the southwest, the traffic flow will be much more efficient and safe by reversing to a counter-clockwise traffic flow. One-way traffic will be to the right of the opposing flow, which is the norm in the U.S. In addition, vans will be able to drive from the commercial boat parking lot directly to the sidewalk in front of the new client parking lot, and load clients in to the right or passenger side of the vans, where the sliding doors are positioned on the van. While the NPS recognizes that this will be a significant change from past practices, it believes that the enhanced visitor safety justifies the change. Clearly effective signing will be a key component of this plan.

Comment 2-3: At the north of the Meeting Place island there is currently a sign that says “No Parking Beyond This Point,” or something to that effect. Perhaps the short distance just south of the Lodge Company take-out slip (Moose Landing #2) to the circulation road around the Meeting Place island should be designated south-bound one-way. That would eliminate unwanted tourist vehicles from the slip areas, which occasionally happens, blocking access to/from the slips. If not designated “one-way” then present sign should be changed to say “Concessioner Vehicles Only.”

Response: Two-way traffic is needed on this section of the road. As described in response to comment 2-1, a formal sign plan will be developed by an interdisciplinary team to address traffic flow and parking issues.

Comment 2-4: We believe utilizing the NEW concessioner client parking/meeting place as well as the OLD meeting place would allow for the segregation of the general public from tour company patrons, reducing conflicts between concessioners who have the same scheduled pick-up times. Currently concessioners work hard to schedule float-trip meeting times that do not conflict with

one another, but every once in a while there is a conflict and it usually involves a tour group. Also, tour companies have the tendency to run late which meshes departure times that were once split.

Proposed Solution – 1. Allow concessioners to pick-up some tour companies in the very north end of the new visitor center parking lot. Most tour companies already visit the visitor center before floating mainly to use the restrooms and then have to reload the coach to make the short drive to the float trip meeting place. If we could just meet them in the visitor center parking lot it would save a step. The tour bus driver could then relocate the coach as soon as the float departs, to the bus parking near the float trip meeting place for patron pick-up.

Proposed Solution – 2. Tour companies that do not visit the visitor center before their float trips could still be picked up at the float trip meeting place. a. In order to keep congestion down and keep tour patrons from having to cross two lanes of traffic to use the new restrooms at the meeting area, it would be beneficial to leave the existing restroom for tour patrons in addition to new restrooms. They are ideally located next to the bus parking.

Response: The NPS agrees the far [west] end of the Craig Thomas Discovery and Visitor Center could be utilized for vans to pick up clients who arrive on motorcoaches. However, at the parking/meeting area, the NPS has determined that segregation of clients on the west side of the roadways, between the road to the west of the island and the new client parking area, offers the highest degree of visitor safety. Further collaborative study and adaptive management will be needed to determine where would be best for vans to pick up clients from busses in this area; however, any potential system will have to meet this segregation goal and the one way traffic flow to the greatest degree possible. The existing restroom will be relocated in order to minimize visitors walking through traffic lanes. Regarding timing, scheduling, and crowding, the NPS has resisted implementing assigned launch times, as described in the 1997 Snake River Management Plan, and is hopeful that the concessioners can cooperatively arrange their schedules to avoid this.

Comment 2-5: The concessioner parking lot could also be bigger.

Response: The northerly concessioner parking lot is not being expanded due to wildlife and habitat concerns; however, overall parking capacity is being augmented substantially with the addition of the southerly parking lot designated for river-use parking.

Comment 2-6: There also are too many non-commercial floaters who park in the concessionaires parking and get away with it. This is where a ranger being around more often would help. Possibly better signs posted would work as well or the creation of more parking.

Response: As described in response to comment 2-1, a formal sign plan will be developed by an interdisciplinary team to address parking issues.

Comment 2-7: Better education of the private boaters on landing area etiquette, traffic patterns, boat staging, etc. would greatly help.

Response: The NPS believes that site rehabilitation and subsequent implementation of a formal sign plan will alleviate confusion surrounding these boating areas and traffic patterns. If in the future the NPS finds there is still confusion, it will examine ways to improve private boater education during the permitting process.

Comment 2-8: However, I do question the proposed plan to not expand that parking area to the north, since there is a natural open field which would only require the removal of a few small trees. Such expansion would allow for vehicles with trailers attached to be parked on both the north and south sides of that parking area, and would provide ample room for both the necessary rigging and the simultaneous pass-through traffic.

Response: As stated in the Alternatives Considered and Dismissed section, page 40, the park considered expanding the river concessioner parking area to the north to meet the need for additional parking. After much deliberation park management decided to avoid further expansion in that area in order to protect the relatively undisturbed and valuable riparian and wildlife habitat.

Comment 2-9: It should be noted that the present Concessioner Parking Area has not encroached upon the park's maintenance division parking or access, but rather the other way around; the parking area designated for concessioner use had existed many years before Maintenance began parking, staging and driving through that area. It is also inaccurately stated that "Concessioner operation vehicles depart the boat landing area and concessioner parking area by traveling through the administration facility (page 4, paragraph 1, lines 9 & 10). We access the concessioner parking area via "Headquarters Road" and do not "travel through the administration facility".

Response: As stated under Changes to Environmental Assessment Text above, the wording was changed to "Concessioner operation vehicles depart the boat landing area and concessioner parking area by traveling on the Headquarters Road."

Comment 2-10: I once again request, as I had when the long-used parking lot was initially paved, that the redesigned and hopefully enlarged paved parking lot not be striped. We outfitters and our personnel can park much more efficiently than planner's guidelines for spacing.

Response: NPS concurs with this comment. As this is only used by commercial vehicles and not the general public, this parking area will not be striped.

Comment 2-11: The new Wash Bay proposed to be on the west side of the Concessioner Parking Access Road at the Headquarters Road junction should more appropriately be located on the east side of the road. It could be located where a median is proposed (map, page 31) and if necessary could encroach into the existing road. The road alignment could then be re-established adjacent to the Wash Bay on the northwest side, thereby avoiding the need for a new intersection and transiting through an expanded maintenance area.

Response: During the NEPA planning process for the Moose Wash Bay, a large interdisciplinary team met to discuss the best location. After much deliberation, the east side of the Headquarters Road was dismissed due to the lack of backing and turning radius required for the fire, EMS, snow plows, and other large maintenance vehicles staged either in the Moose Maintenance Building or in the general vicinity.

Comment 2-12: The proposed access from the maintenance area to the road adjacent to the Loading Dock should be eliminated.

Response: For year-round operational efficiency, this administrative access is necessary to ensure sufficient space for the turning radius of large vehicles entering the wash bay, as well as other large maintenance vehicles departing the administrative area. All vehicles will be required to enter the wash bay from the north end, as there were safety concerns presented by entering from south end.

Comment 2-13: Further, the access to the Western Center for Historic Preservation Building should be from Headquarters Road. There has, on several occasions during the past two summers, been a major problem in the Concessioners Parking Lot caused by the parking of vehicles of the attendees to classes, seminars and meetings taking place at the Preservation Building.

Response: The NPS does not believe the access to the Western Center for Historic Preservation would be improved by routing this traffic on the Headquarters Road and does not want to increase the amount of traffic on this residential section.

While every effort will be made to have the entire commercial boat parking lot available for the outfitters during the key operating months of June through September, outside of this timeframe portions of it may be utilized by the NPS for administrative and maintenance functions.

Comment 2-14: Similarly, a “Concessioner Vehicles Only” sign should be placed at the junction of the access road to the Concessioners Parking Area, where the Headquarters Road turns to the north.

Response: As described in response to comment 2-1, a formal sign plan will be developed by an interdisciplinary team to address traffic flow and parking issues.

Comment 2-15: Design should accommodate bicycle traffic and parking.

Response: Current conditions with regard to bicycle use in the Moose Headquarters Area would continue. Bicycle racks are included as part of the preferred alternative and will be placed in strategic locations throughout the campus.

Topic #3: Restrooms

Comment 3-1: The addition of a restroom at the North end near concessioner parking is a great idea, however, its' location should not be in a place that would cause long lines and additional congestion at the boat landing area. There is potential to have as many as 100 or more float trip clients exiting rafts within 20 minute of each other. The first thing clients want to do is use the restroom. This will create a long line in a spot that is already congested.

Response: After the project is complete, there will be two restrooms available for clients: one by the client parking area and one on the north end near the Concessioner Parking and Staging areas. Not only will the restroom traffic be dispersed between the two restrooms, but also the north restroom will be placed as to not put lines of people into traffic.

Topic #4: Air Quality

Comment 4-1: Although the proposed approach is designed to minimize new construction and disturbance, because the site improvements described in the EA are located within a Class I area in the Grand Teton National Park, EPA is concerned that the short-term demolition or construction emissions could cause visibility impairment within the Class 1 area. We recommend that the NPS strengthen the discussion on Page 38 of the EA to identify specifically how the emission control strategy of spraying water during demolition and construction periods will be conducted. If necessary, the disclosure of a monitoring provision to determine a water application schedule should be presented in the EA.

Response: The NPS contract will include specific provisions and implementation measures to prevent Storm Water Pollution during construction activities, in accordance with the Clean Water Act, the National Pollution Discharge Elimination System permit program, and all Federal, State, and local regulations, and in accordance with the Storm Water Pollution Prevention Plan to be prepared for this project, to include dust control measures. The Contractor will be provided a copy of EPA document EPA 832-F-99-003- Storm Water Management Fact Sheet-Dust Control and will be required to submit a dust control plan prior to construction.

Topic #5: Wildlife

Comment 5-1: As wildlife has adapted to continue to utilize prime habitat despite high human use, we ask the park to consider ways of minimizing the vehicle-wildlife encounters. This could include slowing traffic through additional restrictions in speed, adding rumble strips or dips, signs,

and also including directions in your traffic flow for wildlife viewers to use the current parking lots at the CTDVC and in the new parking space designated for private fishing, boaters, and rv's. This may reduce the congestion when a "wildlife jam" occurs in the Moose Complex and should be considered in this assessment.

Response: While the park recognizes wildlife viewing does occur in the Moose area they are not aware of vehicle-wildlife encounters within the project area. Implementation of the comprehensive sign program for the Moose Headquarters Area, as described in the EA, and in response to comment 2-1 above, will help to control vehicle speed in the project area. Traffic calming devices such as raised speed bumps, dips, etc. proposed in the EA will also help to address this concern.

Topic #6: Aquatic Invasive Species

Comment 6-1: Another critical component of increased visitor use and improved access of the Snake River by recreational boaters and anglers that should be analyzed is aquatic invasive species. Aquatic invasive species could have potentially devastating impacts for our natural systems and the economy that our river resources provide. However, by creatively raising awareness by changing behaviors of users, the likelihood of introductions can be significantly reduced. GTNP might consider increasing signage, kiosks, and displays at the Moose boat launch and supporting parking areas as part of this EA. Further, the Greater Yellowstone Coordinating Committee has recently formed the GYA Aquatic Nuisance Species (ANS) Committee to prevent and control infestations of Aquatic Nuisance Species in Greater Yellowstone waters. The committee includes representatives from federal, state, and county agencies and non-profit organizations. We would urge the park to work with these entities in forming a comprehensive strategy to reduce the impacts and possible introduction of an aquatic nuisance species.

Response: The NPS agrees that ANS is a significant issue facing our aquatic resources. The park is currently working with an inter-agency team to enhance prevention efforts. These currently include boat cleaning and other requirements in fishing guide concession contracts, and this topic will be specifically discussed by the interdisciplinary team that will be developing a sign plan for this project.

Topic #7 Segregation of Incompatible Uses

Comment 7-1: A comprehensive look at the range of uses existing and foreseen for this area should be included.

Response: As described in the EA on page 26, an interdisciplinary team of NPS specialists began meeting in July 2008 for the purpose of developing alternatives for proposed site work at the Moose Headquarters Area. After several meetings, including a value analysis workshop, the interdisciplinary team defined project objectives as described in Chapter 1 of the EA (see Purpose and Need), and a list of alternatives that could potentially meet these objectives. Other things taken into consideration during development of the site plan include those described in the Cumulative Action Scenario on pages 10-12 of the EA.

Comment 7-2: Clearly marked movement through the area by vehicles and pedestrians should be a major component of this objective.

Response: As described in the response to comment 2-1 above, a formal sign plan will be developed by an interdisciplinary team with representatives from NPS, traffic engineers, law enforcement, concessioners, and others as applicable, to ensure that directions are clearly marked.

Comment 7-3: The use of natural barriers and native vegetation should be used to delineate and screen as much of these separate areas as possible.

Response: A mitigation measure for vegetation on pages 36 and 37 of the EA states that “A revegetation plan would be developed for the project that would incorporate, among other things, the use of native species, plant salvage potential, exotic vegetation and noxious weed management, and pedestrian barriers to prevent establishment of user-created trails. The plan would incorporate screening of the warehouse and works yard as well as other structures and parking areas. Revegetation efforts would include reconstruction of the natural spacing, abundance, and diversity of native plant species. Natural groupings of vegetation, rocks, or other natural features would be used for screening, as appropriate. Local native species would be used and there would be no irrigation needs beyond establishment.”

Topic #8 Visitor Enjoyment

Comment 8-1: Visitors in the area, but not preparing for a river trip, might desire to watch the launching of boats, so a safe and inviting area should be provided.

Response: Placing picnic benches in strategic areas is included in the overall site plan. If there is a demand, river viewing areas may be considered; however, due to the valuable wildlife habitat, a permanent presence in the riparian habitat along the river corridor may not be the best option.

Comment 8-2: The scenic, commercial and ecological roles of the Snake River should be included in these displays.

Response: As described in the response to comment 2-1 above, a formal sign plan will be developed by an interdisciplinary team. The Interpretation Division will be involved in the interdisciplinary team and this comment will be forwarded for consideration during development.

Topic #9 Snow Storage

Comment 9-1: Include in your analysis and design for this portion of the project the storage of snow removed from paved areas during winter.

Response: The NPS is not anticipating any changes in the snow storage procedures currently taking place.

Topic #10 Temporary Buildings

Comment 10-1: Will the temporary buildings to be removed from this area be reused to a better degree of efficiency some place else?

Response: Currently there is discussion about relocating and reusing one temporary building owned by NPS. The temporary buildings that are leased will be returned to their owners.

Topic #11 Mitigation Measures

Comment 11-1: Mitigation measures contained in the EA should be followed and modified if found to be ineffective. The EA discusses procedures and guidelines that the Alliance concurs will enhance the actions proposed by alleviating or eliminating negative impacts. The Alliance recommends these measures be incorporated to the fullest degree and monitored for effectiveness.

Response: The NPS agrees with this comment and will incorporate mitigation measures to the fullest extent and will modify if necessary to ensure protection of park resources.

Comment 11-2: The site rehabilitation should include the use of native vegetation only.

Response: A mitigation measure for vegetation on pages 36 and 37 of the EA states that “A revegetation plan would be developed for the project that would incorporate, among other things, the use of native species, plant salvage potential, exotic vegetation and noxious weed management, and pedestrian barriers to prevent establishment of user-created trails. The plan would incorporate screening of the warehouse and works yard as well as other structures and parking areas. Revegetation efforts would include reconstruction of the natural spacing, abundance, and diversity of native plant species. Natural groupings of vegetation, rocks, or other natural features would be used for screening, as appropriate. Local native species would be used and there would be no irrigation needs beyond establishment.”

Comment 11-3: There should be no harm to wildlife during construction or as a result of this project.

Response: The NPS agrees with this comment and will implement mitigation measures for protection of wildlife and will closely monitor operations.