

National Park Service
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Grand Teton National Park
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White Grass Ranch
Rehabilitation and Adaptive Use
Finding of No Significant Impact (FONSI)



FINDING OF NO SIGNIFICANT IMPACT

White Grass Ranch Rehabilitation and Adaptive Use

Grand Teton National Park

In compliance with the National Environmental Policy Act, the National Park Service (NPS) prepared an Environmental Assessment/Assessment of Effect (EA/AEF) to examine various alternatives and environmental impacts associated with the rehabilitation and adaptive use of the White Grass Ranch as a Western Center for Preservation Training and Technology. The EA/AEF, released on September 7, 2004, was prepared to examine four alternatives: Alternative 1 – *No-Action*; Alternative 2 – *Minimum Basic Functions*; Alternative 3 – *Phased Development (Preferred Alternative)*; and Alternative 4 – *Complete Build-out*. Topics of concern identified during scoping and evaluated in the EA included archaeological resources, historic structures, cultural landscapes, vegetation, wilderness, wildlife (including threatened, endangered, and special concern species), park operations and partnerships, and visitor use and experience.

White Grass Ranch, the third oldest dude ranch in the Jackson Hole valley, is located in Teton County, Wyoming three miles west of Moose, Wyoming at the foot of Buck Mountain, at an elevation of 6,720 ft. (2,048 m.). The White Grass Dude Ranch Historic District encompasses approximately thirty acres and was listed in the National Register of Historic Places in April 1990. It is significant because as a dude ranch it helped define and set the standards for the Jackson Hole dude ranching industry, and the historic district exemplifies the local development of dude ranches from cattle ranches. The dude ranch also represents the response of settlers to construct rustic log buildings in a natural environment. Constructed as early as 1913, White Grass Ranch remained open as a dude ranch until 1985. The historic district consists of ten cabins, a main cabin, the Hammond cabin, and a shower/laundry building.

The National Park Service is mandated to preserve historic structures within its management. Section 110(a)(1) of the National Historic Preservation Act states, "*The heads of all Federal agencies shall assume responsibility for the preservation of historic properties which are owned or controlled by such agency. Prior to acquiring, constructing, or leasing buildings for purposes of carrying out agency responsibilities, each Federal agency shall use, to the maximum extent feasible, historic properties available to the agency.*" In the spirit of this mandate, Grand Teton National Park (GTNP) proposes to adaptively use and manage White Grass Ranch as a Western Center for Preservation Training and Technology (WCPTT) to preserve historic structures at the White Grass Ranch and other historic structures throughout the region, and to provide opportunities for park employees and others to receive training in western historic preservation techniques and technology.

A need exists to address the backlog of maintenance on many of the GTNP's 318 structures listed in or eligible for listing in the National Register of Historic Places which are on the verge of becoming irretrievable ruins within the next five years. More than 1,000 historic structures in Yellowstone National Park are in fair to poor condition and require preservation. Additionally, there are 2,044 historic structures within a 200-mile radius of Grand Teton National Park in need of preservation. The training, technology, and skills necessary to preserve, rehabilitate, and maintain rustic and vernacular structures are not available in today's Western parks and surrounding communities. A center to develop those skills is necessary to address a large backlog of preservation and maintenance needs for rustic and vernacular buildings park- and region-wide starting with historic structures in Grand Teton and Yellowstone national parks.

Furthermore, the NPS Mission Statement affirms that the Park Service cooperates with partners to extend the benefits of natural and cultural resource conservation and outdoor recreation throughout this country

and the world. Shared stewardship is a Park Service core value that emphasizes a commitment to resource stewardship with global preservation communities. A general agreement was signed between the NPS and the National Trust for Historic Preservation (NTHP) in October 2003, which outlined a partnership for analyzing opportunities for rehabilitating and adaptively using White Grass Ranch. After a fundraising agreement is signed by the NPS and the NTHP, the NTHP will fundraise up to \$1 million dollars for the preferred alternative.

SELECTION OF THE PREFERRED ALTERNATIVE (Alternative 3 in the EA)

After a thorough review of impacts of the alternatives on cultural, natural, and social resources, consideration of public comment, and consultation with the U.S. Fish and Wildlife Service (USFWS) and the Wyoming State Historic Preservation Office (SHPO), the preferred alternative (Alternative 3) has been selected for implementation. Alternative 3, the proposed undertaking for §106 compliance, addresses the critical need to rehabilitate and preserve historic structures through adaptive use and to provide historic preservation training to GTNP and NPS staff. This will be done by rehabilitating and adaptively using the White Grass Ranch as a Western Center for Preservation Training and Technology. The Center will be supervised by the Superintendent of GTNP, and serves as an operational element of the park's overall operations. The project includes the following components with specific rehabilitation actions are outlined in Appendix G of the EA/AEF.

Historic Buildings Rehabilitation

Three historic buildings (main cabin, shower/laundry building, and Hammond cabin) will be rehabilitated immediately, while the remaining ten historic structures will be stabilized and eventually rehabilitated using training center instructors, trainees, and volunteers. These ten structures, once rehabilitated, will provide lodging for instructors, trainees, and volunteers and will include bathroom facilities in each cabin. The main cabin will be rehabilitated and adaptively used as a classroom facility and office space for the training center's employees (four or less people). The shower/laundry building (historic use) will be rehabilitated and adaptively used as a utility building to shelter the potable water storage tank. The Hammond cabin will be rehabilitated and adaptively used for a research library/meeting space, community kitchen for trainees (the kitchen will be used once the remaining buildings are rehabilitated and adaptively used for trainees' lodging), and housing for the seasonal, on-site volunteer caretaker. The rehabilitation of these three buildings will provide for a fully functional Western Center for Preservation Training and Technology. Both the main cabin and the Hammond cabin will be handicapped accessible. Once rehabilitated, cabin #1155, located between the main cabin and the Hammond cabin, will be handicapped accessible and used for trainee lodging. All work will follow the *Secretary of the Interior Standards for the Treatment of Historic Properties*. The entire project will take approximately five years to complete.

Utilities and Infrastructure

The preferred alternative will provide full utilities (electric, phone, water, and sewer) at the training center. A water well will be developed and used at the ranch. A well house will be constructed next to the parking area and JY Ranch hay shed (which will be located south of the main cabin once it is moved to the ranch) to shelter the well and its associated equipment. The single-story well house will be approximately twelve feet by eighteen feet. Water lines will be installed from the well house to all thirteen buildings. A septic tank and leach field will handle wastewater, and will be constructed approximately 100 feet east of the Hammond cabin. Electricity will be brought to all thirteen buildings from the existing power line that runs on the south and west sides of the property. Phone lines will be installed to the main cabin, Hammond cabin, and cabin #1155. All utility line installation will use existing utility corridors to the extent possible.

Roads and Grounds

The ground around all the buildings and infrastructure will be graded to provide positive drainage. The secondary White Grass road on the property and the historic pasture will be stabilized but not used (see Affected Environment: Historic Structures and Cultural Landscapes). All ground disturbance activities will be revegetated using native vegetation. In an attempt to prevent social trailing, education will be provided at an outside kiosk on the ranch and student orientation will include information on social trailing, as opposed to constructing a pole and rail fence immediately around the buildings. The Death Canyon Road will be used to access the White Grass Ranch area. As part of previously scheduled routine maintenance as described in the No-Action Alternative, the road will be graded and gravel added to stabilize the road. A small spur road will be constructed from Death Canyon Road to the ranch as access for operational activities. The spur road will begin at the Death Canyon Road roughly where the main cabin is visible from the road. It will run perpendicular to Death Canyon Road for approximately 400 feet, at a width of 15 feet, and it will be made from gravel. At the end of the spur road will be a small gravel parking area that will accommodate six vehicles.

Parking

Limited parking will be provided for deliveries, instructors, and employees. Carpooling and/or shuttling will be encouraged for trainees and will be staged from the Moose maintenance area. Next to the parking area will be a small fenced-in area used for construction staging. This fence will be removed upon completion of construction activities. The location of the parking area, well house, JY Ranch hay shed, and part of the spur road is in a previously disturbed area; the White Grass Ranch barn, corrals, and other buildings used to be there.

Center Operations

The training center will operate seasonally for a maximum 7-month period with most activities taking place between late April and September, including opening and shutting down operations. The training center will accommodate fifteen to thirty daytime users. Initially, lodging will not be available at White Grass Ranch, but ultimately about twelve to fifteen overnight users, including the volunteer site manager, could be accommodated as additional cabins are rehabilitated by instructors, trainees, and volunteers. Besides the volunteer site manager, no training center/park employees will live at White Grass Ranch. The main carpentry/masonry shop for the training center will be located in the Moose maintenance area (park headquarters). The donated JY Ranch hay shed will be moved to White Grass Ranch, placed on the south side of the main cabin next to the parking area, and used for storage. The Western WCPTT staff and trainees will car- or van-pool to the site to minimize traffic impacts to the area.

Mitigation Measures

Mitigation measures are designed to prevent or minimize adverse impacts or to contain impacts within acceptable limits during and after project implementation. The following are mitigations that will be incorporated into project implementation. These mitigations and guidelines are specific to the project area and to the wildlife resource issues analyzed in this document. The following mitigation measures will be implemented to reduce the effects of the proposed project on natural, cultural, and social resources.

Natural Resources

- 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 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 complex. All project staff, trainees, and other personnel will be briefed about food storage needs, and bear safety protocols, and advised to carry bear pepper spray when conducting outdoor activities in the project area. The

kitchen building will have an indoor garbage storage facility to ensure compliance with food storage requirements. 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). No bird feeders or vegetable gardens will be permitted.

- No pets will be allowed at the site.
- All trash and recycling facilities associated with the training center will be of bear resistant design and stored indoors.
- Monitoring of grizzly bear populations will continue in accordance with the Interagency Grizzly Bear Management Guidelines and the park's bear management plan.
- GNTNP is following the recommendations of the Lynx Conservation Assessment and Strategy. A map identifies the various habitats used by lynx (e.g., diurnal security, denning, and foraging) and their relationship to human activities. GNTNP will continue to solicit and support research on lynx ecology.
- 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. The park will continue to support the objectives of the Greater Yellowstone Bald Eagle Management Plan.
- Monitoring of wolf populations will continue.
- To minimize adverse affects to any bats present, buildings will be surveyed before they are stabilized and rehabilitated. If spring surveys are conducted and bats are found using the site as a roost, rehabilitation activities should not occur until after August 31, when the individuals and/or young have left the buildings. If bat species are found roosting, permanent sealing will not occur until the fall, when bats have left the buildings for the winter. If surveys conducted during the fall do not reveal bat species, then rehabilitation activities should occur within three days in order to prevent the destruction of bats that move into the area after the survey.
- Education will be provided at an outside kiosk on the ranch for visitors and student orientation will include information on social trailing to minimize social trailing.
- To minimize disturbance to elk and park visitors during the elk rut (September 15 – October 15), noise-producing activities will stop at 5 p.m. Limitations may include activities such as vehicle traffic, construction activities, the use of loud tools, etc.
- Construction zones will be identified and outlined with construction tape, snow fencing, or some similar material prior to any construction activity. Activity will be confined to the minimum area required for construction and laydown materials. No activity, including vehicle or material storage, will be allowed outside the predetermined zone.
- Only one construction trailer will be permitted on site for security purposes during the construction period between May 1 and September 30. No tents or other overnight activities by construction contractors will be permitted.
- Construction activities will be scheduled to occur during daytime hours to the greatest extent possible to limit non-natural sound impacts on nocturnal wildlife in the area.
- Construction work with heavy equipment will occur approximately between May 1 and September 30 to minimize impacts on wildlife during seasonal migration periods and to preserve quiet around White Grass Ranch during the construction period.
- 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. Construction equipment will be checked 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.

- In an effort to avoid introduction of exotic plant species, no hay bales will be used. Hay often contains seed of undesirable or harmful alien plant species. Therefore, on a case-by-case basis the following materials may be used for any erosion control dams that may be necessary: rice straw, straws determined by NPS to be weed-free (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 will also be used to minimize any potential soil erosion.
- Silt fencing fabric will be inspected weekly or after every major storm. Accumulated sediments will be removed when the fabric is estimated to be approximately 75% full. Silt removal will be accomplished in such a way as to avoid introduction into any wetlands or flowing water bodies.
- Construction activities will be limited to designated areas when soils are excessively wet such that rutting will be caused by wheeled vehicles. Any rutting will be mitigated by grading and reseeded. Construction will take advantage of previously disturbed areas wherever possible.
- Vegetation impacts and potential compaction and erosion of bare soils will be minimized by conserving topsoil in windrows. The use of conserved topsoil will help preserve micro-organisms and seeds of native plants. 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.
- All disturbed slopes will be revegetated with native species from genetic stocks originating in the park. Revegetation efforts will be to reconstruct the natural spacing, abundance, and diversity of native plant species. All disturbed areas will be restored as nearly as possible to pre-construction conditions shortly after construction activities are completed.
- Erosion of soil side-cast during construction will be minimized by placing silt fencing around the excavated soil. Excavated soil may be used in the construction project; excess soil will be stored in approved areas.
- When construction is ended 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.
- 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.
- The trainees and contractors will control dust during construction by minimizing soil exposure, and watering and use of other dust prevention methods.
- All utilities will be located underground, unless otherwise approved by the park.
- Human-made sounds originating from White Grass Ranch will be mitigated when possible by using power tools inside closed buildings rather than outside, not playing radios or using loudspeakers outside, and providing all personnel with standard noise mitigating procedures with sensitivity training on how non-natural sound affects the soundscape.
- 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.
- Improved maintenance of Death Canyon Road will mitigate effects to water quality by controlling erosion.
- Best Management Practices will be used during construction to mitigate impacts to resources.
- Sustainable design and materials will be considered, as well as alternative energy and green building strategies, to the extent practicable and allowable in a Historic District so as not to conflict with the historic character of White Grass Ranch. Low-flow fixtures, energy star appliances, special lighting, etc. will all be considered during the design and construction phases of the project.

Cultural Resources

- All actions that will take place, including mitigation, will only be implemented after sufficient consultation with and clearance by the Wyoming State Historic Preservation Office under §106 of the National Historic Preservation Act. This process ensures that the SHPO is consulted and concurs with any action proposed, before action is taken.
- Should construction unearth previously undiscovered archaeological resources, work will be stopped in the area of any discovery, and the park will consult with the park archaeologist, 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 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.
- The park will ensure that the historic irrigation ditches, if present, are not harmed as a result of heavy equipment or material storage on-site.

Social Resources

- The site will remain clean of construction debris and clean during operations of the training center. The training center will be available for inspection at any time during the construction phase by the park or regulatory authorities.
- 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.

OTHER ALTERNATIVES CONSIDERED

Alternatives 1, 2, and 4 were analyzed in the EA/AEF, but were not selected for various reasons. Although Alternative 1 did not meet the project objectives and Alternative 2 only minimally met the objectives, Alternative 4 fully met the objectives as much as Alternative 3. However, Alternative 4 would cost approximately 60% more. Alternative 3 eventually builds out the same as Alternative 4 over time. The difference is that Alternative 3 will use student trainee labor to finish what Alternative 4 would have a contracted company build in a shorter time. Alternative 3 allows the WCPTT program to gradually develop a curriculum initially tailored to rehabilitating the White Grass Ranch. The other alternatives analyzed in the EA/AEF are outlined below.

Alternative 1 - No Action: Implementing the no-action alternative would result in the continuation of existing conditions at the White Grass Ranch. Activities that currently occur at the ranch would continue as follows: sealing buildings to prevent the entry of humans and small mammals; installing plastic on roofs to prevent interior water damage; shoring up roofs, porches, and/or walls when necessary to prevent collapse; and removing snow from roofs when deemed necessary. The buildings will continue to deteriorate and the park may be at risk of irretrievably losing structures listed in the National Register of Historic Places. The buildings would be minimally stabilized or preserved, but not adaptively used, and a preservation training and technology center would not be developed.

Alternative 2 – Minimum Basic Functions: In the minimum basic functions alternative, a seasonal day-use training center would be developed with only the absolute minimum basic functions provided.

Only the main cabin would be rehabilitated and the other twelve buildings would be stabilized, but may be rehabilitated as a result of the operation of the training center. Minimal infrastructure (electrical power only; no water, sewer or phone) would be developed. Instructors and trainees would bring bottled water to the site, a vault toilet would be constructed, cell phones would be used for communication, and there would be a pack in, pack out policy in place.

Alternative 4 – Complete Build-Out: This alternative involved rehabilitating all thirteen historic structures immediately so that the training center would be ready to move into and would be fully functional for seasonal overnight use immediately. Full utilities (electric, phone, water, and sewer) to all buildings would be developed. A septic tank and leach field would handle wastewater.

Alternatives Considered, But Rejected for Consideration in the EA: In addition to the four alternatives analyzed in the EA, several other alternatives were considered by the park's Interdisciplinary Team based on the extent to which the purpose, need, and desired future conditions were met. The rationale for dismissal of seven other alternatives follows.

Year-round use, on a limited basis, was discussed but dismissed due to incompatibility with winter use and access, and utility and park operation concerns. Rehabilitating the buildings without adaptively using them was also discussed and dismissed as it did not meet the purpose and need for the project. Rehabilitating the buildings and adaptively using them for some other purpose was discussed and dismissed, because it did not meet the need or objectives. Rehabilitating the buildings and returning White Grass Ranch to a working dude ranch was also dismissed because it did not meet the purpose, need or objectives for the project and it would add considerably more personnel and visitors to the area. The alternative of returning the area to a natural state was also discussed but dismissed, as the National Park Service is mandated to care for its cultural resources according to the National Historic Preservation Act.

The NPS considered establishing a WCPTT in a western park other than GTNP, but decided that this area was the best location because GTNP and Yellowstone National Park (YNP) combined have more than 1,300 historic buildings, a majority of which are in fair to poor condition. Appendix A in the EA/AEF shows the data collected that suggests that GTNP is an ideal central location for a center. Additionally, these two parks combined have only six employees trained to preserve these buildings. Rocky Mountain National Park has approximately 300 historic buildings and a historic preservation crew to maintain them. Glacier National Park was deemed too remote to travel to for instructors and trainees.

White Grass Ranch was chosen over other historic districts in the region because: 1) alternative locations have far fewer historic rustic and vernacular buildings immediately proximate, 2) White Grass Ranch provides facilities of the proper number, scope, and scale for the preservation training center envisioned, 3) there is a need to develop a workforce with the skills required for proper preservation of the thousands of historic rustic and vernacular buildings in close proximity to White Grass Ranch, 4) the town of Jackson, Wyoming and the nearby year-round airport provide the proper accommodations and transportation opportunities needed to support the preservation training center and training facilities, 5) the maintenance facilities at GTNP headquarters in Moose, Wyoming complement the facilities at the White Grass Ranch to extend the benefits and opportunities the preservation training center will provide, and 6) the White Grass Ranch site provides an opportunity to include interpretation and public interaction due to its history as a public day use area and the public access road and trails located nearby. The possibility of having a preservation training center elsewhere in the park was discussed but dismissed due to the suitability of the White Grass Dude Ranch Historic District for such a center. Other vacant historic districts like Bar BC Dude Ranch, Hunter Hereford Ranch, and Wolff Ranch do not provide facilities and/or infrastructure of the proper number, scope, condition, and scale for the preservation training center envisioned.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The environmentally preferred alternative is determined by applying criteria described in §101 of the National Environmental Policy Act (NEPA) and implemented by the Council on Environmental Quality (CEQ) regulations. In light of these criteria, the environmentally preferred alternative is the alternative that will best:

1. *Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations.*
2. *Assure, for all generations, safe, healthful, productive, and aesthetically 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 would permit high standards of living and wide sharing of life's amenities.*
6. *Enhance the quality of renewable resources and approach the maximum attainable recycling of resources.*

Alternative 1 (No-Action) would stabilize the buildings and maintain existing conditions at White Grass Ranch, but would not rehabilitate or adaptively use the buildings for a Western Center for Preservation Training and Technology. Although the No-Action alternative meets goal 1, it does not meet goals 4 or 6 because it fails to properly preserve or adaptively use historic structures. Adaptive use of historic structures provides better protection and preservation than stabilization alone. As the buildings may still pose some health and safety hazards to visitors, it does not meet goal 2, 3, or 5 because there would be no provisions for promoting visitor use of the area or providing any interpretation of the site.

Alternative 2 (Minimum Basic Functions) would stabilize twelve buildings, and rehabilitate and adaptively use one building for a Western Center for Preservation Training and Technology. Although Alternative 2 meets goal 1, it minimally meets goals 2 and 4 by preserving buildings and adaptively using one building. However, twelve buildings would still remain unused, thus not meeting goals 5 and 6 to the fullest extent. Goal 3 is minimally met by having staff and trainees on site to interact with area visitors.

Alternative 4 (Complete Build-out) would completely rehabilitate and adaptively use all thirteen buildings immediately for a Western Center for Preservation Training and Technology. Alternative 4 strives to and meets goals 1-6, but not to the extent of Alternative 3 because it does not allow for the use of volunteer labor or provide the additional training opportunity afforded by having buildings on-site to work on over time. Experienced historic preservation trainers emphasize the need to initially have some buildings on-site for training purposes in order to develop a safe, comprehensive training program, thus Alternative 4 does not meet goal 6 as well as Alternative 3.

Alternative 3 (Phased Development) will initially stabilize ten buildings and rehabilitate and adaptively use three buildings as a Western Center for Preservation Training and Technology. Later, through phased development, all thirteen buildings will be rehabilitated and adaptively used for the training center. While each of the alternatives considered meet some of the criteria listed above, Alternative 3 meets all of the six §101 goals and it best meets criteria 1, 3, and 5. Goal 1 is better met in this alternative by managing development in a slower, more controlled build-out allowing the NPS to better address exotic species issues and disturbed land restoration activities. Goals 3 and 5 are more fully met by having staff and trainees on site for the longest period of time to develop a better on-site training program and to interact with visitors who are in the area. By using volunteer labor to construct the full build-out of the center, this

alternative indirectly meets all the goals because it conserves financial resources that otherwise could be used for the protection of other parks' resources in the National Park System.

Alternative 3 attains the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences. In doing so, it meets the six §101 goals to the greatest extent of any of the alternatives. Consequently, Alternative 3 is the environmentally preferred alternative as well as the NPS preferred alternative. A detailed evaluation of the environmentally preferred alternative is provided on page 35 of the EA/AEF.

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

The proposed action will have no impacts on ethnographic resources, museum collections, air quality, land use, natural lightscapes, prime and unique agricultural lands, soils, water quality and hydrology, wetlands and floodplains, wild and scenic rivers, environmental justice, Indian trust resources, or the socioeconomic environment. Impacts to archaeological resources will be negligible, as no archaeological resources have been identified in the proposed project area. Impacts to historic structures and cultural landscapes will be long-term, minor to moderate and beneficial as ten historic structures will be stabilized, three historic structures will be rehabilitated, and contributing cultural landscape features will be stabilized. Impacts to vegetation resources will be minor to moderate, long-term, and adverse due to ground disturbance associated with utilities installation, grading around buildings, and installation of the spur road, parking area, hay shed, and well house. Although the disturbance will remove native, non-native, and ornamental vegetation and allow areas to be exploited by additional non-native plant species, mitigation measures employed to offset these adverse effects are likely to be successful. Wilderness (potential and recommended) impacts will be negligible and adverse in the short-term due to sounds associated with initial construction that could be heard in wilderness. There will also be negligible to minor, long-term, adverse impacts as sounds resulting from day and night use of the area may carry into wilderness areas.

General wildlife impacts include short-term, negligible to minor adverse impacts due to increased disturbance to wildlife, their continued avoidance of the area, and loss of effective habitat that will result initially from construction activities and then long-term impacts from higher levels of human activities during facility operation. Operation of the facility and overnight use will result in minor, adverse, long-term impacts due to more human occupation and dispersal which will be disruptive to wildlife. Impacts to species of management concern will be long-term, negligible to minor and adverse due to overnight users and correspondingly greater human occupancy and associated non-natural sound that could increase the potential for disturbance and displacement of sensitive species, and short-term, negligible to minor impacts due to construction activities that could displace species initially. Threatened and endangered species will be impacted long-term, negligibly to minor, and adversely due to increased human presence that could result in social trails and dispersed human use outside of the footprint of the project area. Short-term, negligible to minor, adverse impacts will result from non-natural sound generated from activities associated with the rehabilitation and stabilization of the buildings potentially causing these species to avoid using adjacent habitat. The USFWS concurs with the NPS determination of "May Effect, Not Likely to Adversely Affect" for grizzly bear, Canada lynx, and gray wolf; and "No Effect" for bald eagle and yellow-billed cuckoo.

Park operations will be impacted with long-term minor to moderate adverse impacts on the facility management division due to the maintenance of Death Canyon Road and the spur road, the water well,

leach field, and removal of solid waste. There will be a long-term, minor adverse impact to weed management personnel due to ground disturbance. However, a long-term, moderate beneficial impact to park operations will occur because the training center will provide the park an increased capacity to preserve the park's historic buildings. The impacts to park visitor use and experience will be minor and adverse in the short-term due to the noise, dust, and visual disturbance from building rehabilitation and stabilization, and visitors valuing the area for other reasons (i.e. wildlife viewing, tranquility) will experience minor, adverse and long-term impacts due to the change in use which they will perceive negatively. Long-term, minor beneficial impacts will result from improved protection of historic buildings, including the ranch itself, through exposure of personnel to preservation training. Also, a portion of park visitors will value the rehabilitation and adaptive use of White Grass Ranch because it will demonstrate the park's willingness to preserve cultural resources. Impacts to visitor safety will be long-term, minor and beneficial as the hazards associated with the deteriorated buildings will be eliminated.

Degree of effect on public health or safety

Since 1985, the buildings at White Grass Ranch have seriously deteriorated and are structurally unsafe. Roofs and walls are caving in due to neglect and the four to six feet of heavy snow that accumulates on the roofs each winter make many of the structures unsafe to enter. While the buildings are currently boarded up, evidence of human trespass is apparent in the form of litter. Visitors who enter the buildings are exposed to several safety hazards associated with the deteriorating structures, such as the potential for a wall or roof to collapse or be exposed to bats, pine martens, and deer mice, which may carry the potentially deadly Hantavirus. Alternative 3 will rehabilitate White Grass Ranch and eventually eliminate the threats that deteriorated structures and abandoned infrastructure pose to visitors. The preferred alternative will have an overall beneficial effect on public health and safety for visitors to the ranch.

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

The preferred alternative will not impact prime farmlands, wetlands, floodplains, wild and scenic rivers, or ecologically critical areas. There will be no significant impacts to historic or cultural resources as described in Table 3 in the EA/AEF. Implementing Alternative 3 – Phased Development (preferred alternative) will have long-term, minor to moderate beneficial impacts. The rehabilitation work performed on the White Grass Dude Ranch Historic District will be done in accordance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties* and *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes* and will have no adverse effect under §106.

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

The effects of the proposed action on the quality of the human environment are not expected to be highly controversial. The NPS provided copies of the scoping brochure and the EA/AEF to approximately 150 parties. In addition, the same information was available on the park's website, at the Teton County Library, and at the Moose Visitor Center. The park received 20 comments on the scoping brochure and 55 on the EA/AEF, almost all of which were from the local area. Although some people disagreed with the NPS, USFWS and Wyoming Game & Fish Department agreed that the preferred alternative poses relatively minor effects to wildlife. This disagreement among some individuals and organizations does not constitute high controversy. Human activity at the White Grass Ranch occurred in much greater numbers for more than 70 years (until 1985) without significant effects to wildlife. The U.S. Fish and Wildlife Service concurred with the park's determination of the effects on threatened and endangered species. The SHPO concurred there would be no adverse effect to cultural resources regarding the rehabilitation and adaptive use of the thirteen historic buildings currently located at the site. The NPS and the SHPO have agreed to further consultation regarding the eligibility of the potential cultural landscape, the placement and orientation of any additional buildings, and the location and design of parking areas.

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

The effects of the preferred alternative are relatively common and do not pose many uncertainties. The environmental process has not identified any effects that may involve highly uncertain, unique or unknown risks.

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 action for this project will not set any precedent for the National Park Service. The preferred alternative will not have 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

Projects within GTNP with potential impacts to the White Grass Ranch area include the adaptive use of the Murie Center, maintenance of Death Canyon Road, activities outlined in the draft Transportation Plan/EIS, construction of a new visitor center at Moose, expiration of the 25-year use and occupancy at Sky Ranch in 2005, transfer of the JY Ranch to NPS in 2006, and the planned expansion of Teton Village. Increased visitor use of Moose-Wilson Road is inevitable with the expansion of Teton Village directly to the south of the park along Moose-Wilson Road, the construction of a new Moose Visitor Center, and the addition of a visitor contact station on the JY Ranch property. Although activities at White Grass Ranch are anticipated to increase slightly, traffic along Death Canyon Road is expected to stay relatively the same with the addition of a visitor contact station and parking lot on the JY Ranch property along Moose-Wilson Road. Access to Phelps Lake will be easier and likely a shorter hike through a trail system located at the new parking lot on the JY Ranch property.

Before the JY Ranch transfer, several modifications will be made by its existing owner. The combination of facilities, infrastructure, roads, and trails throughout the JY property will be greatly reduced and will be concentrated in a smaller area within the property. A new visitor contact station will be located off Moose-Wilson Road south of the Death Canyon Road junction; however, many structures will be removed and there will be a net loss of 14,300 square feet. Approximately 11,970 linear feet of paved roadway and 4,410 linear feet of gravel roadway will be removed. Although a gain of 6,200 square feet of parking will occur to support the new visitor contact station, the surface will remain pervious. The area will also experience a net loss of approximately 41,528 linear feet of trails. The JY Ranch was historically used year-round by the Rockefeller family during the day and overnight. Although the transition of the use of this property will likely attract more visitors to the area, especially around Phelps Lake, use in the area will be limited to day-use only and occur seasonally. Less traffic will occur in the winter on Moose-Wilson Road, as snow will no longer be plowed to the south JY entrance. The road will only be plowed up to Death Canyon Road junction.

These actions all have the potential to cumulatively effect traffic and wildlife movement along the Moose-Wilson Road. All past, present, and future activities have been reviewed by park wildlife professionals and have been determined to not significantly affect wildlife or threatened & endangered species. USFWS concurrence was received on this determination on October 12, 2004. The transportation plan will address administrative actions over the next 5-10 years that could be applied to the Moose-Wilson Road to pilot study different management actions. The new General Management Plan (GMP) will use data collected during the pilot studies proposed at Moose-Wilson Road to assess traffic volume and flow issues and make permanent decisions for the Moose-Wilson corridor and associated side roads and trails.

The adverse impacts of the preferred alternative, in conjunction with beneficial and adverse impacts of other recently completed or reasonably foreseeable future actions, will result in both beneficial and

adverse cumulative impacts on the resources analyzed in the EA/AEF. The intensity of these cumulative impacts ranges from negligible to moderate. No individually insignificant but cumulatively significant impacts will occur to any resources as a result of the preferred alternative in combination with all other related actions.

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 analysis in the EA/AEF determined that the effects of the preferred alternative on cultural resources eligible for or listed in the National Register, or other significant scientific, cultural, or historic resources will be long-term, minor to moderate and beneficial to historic structures and the cultural landscape. Ten historic structures will be stabilized, three historic structures will be rehabilitated, and contributing cultural landscape features will be stabilized. Eventually the ten stabilized historic structures will be rehabilitated. Impacts to archaeological resources will be negligible, as no archaeological resources have been identified in the proposed project area. No effects will result to ethnographic resources or museum collections. The NPS contends that any impacts resulting from the proposed action can be mitigated so that there will not be an adverse effect to any cultural resource. The Wyoming SHPO concurred on October 8, 2004 with the NPS determination of "no adverse effect" under Section 106 of the National Historic Preservation Act. All preservation and rehabilitation work at White Grass Ranch will be done in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*.

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

The preferred alternative would not affect bald eagles or yellow-billed cuckoos because they and/or their habitats do not occur within the proposed project area. As described in the EA/AEF, the preferred alternative may affect but is not likely to adversely affect grizzly bears, gray wolves and Canada lynx. The proposal could impact individual lynx, grizzly bears or wolves, but any impacts are not expected to rise to the level of adverse or affect the long-term recovery of these threatened populations. The "not likely to adversely affect" determinations are based on our assessment that important habitat components (e.g. den sites, important food sources, etc.) for these species would not be impacted and that direct mortalities are unlikely or have their potential significantly reduced through mitigation measures. The implementation of mitigation measures (see pages 3-5) for federally listed species will ensure that impacts resulting from this proposal will be minimized. No critical habitat for any federally listed species has been designated within Grand Teton National Park; therefore none would be affected by the proposal. In a letter dated October 12, 2004 the Wyoming Field Office of the US Fish and Wildlife Service concurred with the above species determinations.

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.

IMPAIRMENT

In addition to reviewing the list of significance criteria, the National Park Service has determined that implementation of the preferred alternative will not constitute an impairment to Grand Teton National Park's resources and values. This conclusion is based on a thorough analysis of the environmental impacts described in the White Grass Ranch Rehabilitation and Adaptive Use EA/AEF, the public and agency comments received, relevant scientific studies, and the professional judgment of the decision-makers guided by National Park Service *Management Policies 2001*. Although the plan 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, and it does not result in their impairment.

PUBLIC INVOLVEMENT

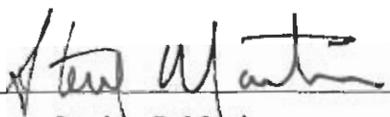
The public scoping process for the White Grass Ranch Rehabilitation and Adaptive Use EA/AEF began in February 2004, with the NPS seeking public comment on issues, alternatives, concerns and other considerations regarding the proposal. Both a news release and a scoping notice describing the proposed action were issued on February 18, 2004 and mailed to approximately 150 parties. The American Indian tribes traditionally associated with the lands of Grand Teton National Park were apprised of the proposed action on February 18, 2004. Comments were accepted through March 21, 2004.

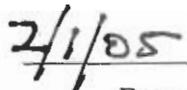
The White Grass Ranch Rehabilitation and Adaptive Use EA/AEF underwent a 36-day public comment period, from September 7, 2004 through October 12, 2004. The planning office mailed 151 copies of the NEPA document to government agencies, private organizations, and individuals. In addition, the document was posted on the park's web page (www.nps.gov/grte/plans/planning.htm), and copies were available at the Moose Visitor Center and Teton County Library. A press release was also issued to local media. The *Jackson Hole News & Guide* published several articles about the adaptive use of the property during the month of October. In response, the park received fifty-five (55) written comments from government agencies, private organizations and individuals. Substantive comments to the EA/AEF centered on five topics: historic preservation of structures and related actions; comprehensive planning and the National Environmental Policy Act (NEPA) process; resource impacts to soundscape, wildlife, and historic structures; traffic on Moose-Wilson and Death Canyon Roads; and public access. These concerns resulted in no changes to the text of the environmental document but are addressed in errata sheets attached to this FONSI document. The NPS also responded to substantive comments in the errata sheets. The FONSI and errata sheets will be sent to all those who commented.

CONCLUSION

The preferred alternative does not constitute an action that normally requires preparation of an environmental impact statement (EIS). The preferred alternative will not have a significant effect on the human environment. Most of the adverse environmental impacts that will occur are negligible to minor in intensity and primarily short-term. There are no significant or unmitigated adverse impacts on public health or safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, 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 plan and thus will not be prepared.

Approved by: 
Stephen P. Martin
Director, Intermountain Region
National Park Service


Date

Errata Sheets

White Grass Ranch Rehabilitation and Adaptive Use Environmental Assessment/Assessment of Effect Grand Teton National Park

Comments were sorted to determine if they raised issues or alternatives not previously addressed either in scoping or in the White Grass Ranch Rehabilitation and Adaptive Use Environmental Assessment/Assessment of Effect (EA/AEF), or questioned the accuracy and/or adequacy of the environmental analysis. Comments that were in favor of or against the preferred action or other alternatives, or comments that only agreed or disagreed with NPS policy were not considered substantive (DO-12 Handbook, Section 4.6A) and did not receive a response. Substantive comments to the EA/AEF centered on five topics: historic preservation of structures and related actions; comprehensive planning and the National Environmental Policy Act (NEPA) process; resource impacts to soundscape, wildlife, and historic structures; traffic on Moose-Wilson and Death Canyon Roads; and public access. Substantive comments and responses follow and are grouped by topic for consideration in the decision making process.

The **Response to Comments** section addresses comments received that warranted clarification or explanation. Although these comments did not result in changes to the EA/AEF, other information received after the EA/AEF was published is included on these errata sheets listed in the **Changes in the Environmental Assessment Text** section below. The combination of the EA/AEF and the errata sheets form the complete and final record on which the Finding of No Significant Impact (FONSI) is based.

CHANGES IN THE ENVIRONMENTAL ASSESSMENT TEXT

On August 8, 2004 a bat survey was conducted at White Grass Ranch and the uncommon, state-listed sensitive species – Townsend’s big-eared bat – was found to be present in some of the buildings. Although this information does not change the way the NPS plans to manage bat species at the ranch, it is important that this species of management concern be documented and managed accordingly at White Grass Ranch. The following represents a typo and updated information that are errata to the EA/AEF:

1. On page 25, under Alternative 4 – Complete Build-Out, third paragraph, second sentence: *delete* the existing sentence, “The secondary White Grass road on the property and the historic pasture would be stabilized but not used (see affected Environment: Historic Structures and Cultural landscapes)” and *replace with* “The historic pasture would be stabilized but not used, while the secondary White Grass road would be rehabilitated and used (see affected Environment: Historic Structures and Cultural landscapes).”
2. On page 28, replace the 9th bullet with: “To minimize adverse affects to any bats present, buildings will be surveyed before they are stabilized and rehabilitated. If spring surveys are conducted and bats are found using the site as a roost, rehabilitation activities should not occur until after August 31, when the individuals and/or young have left the buildings. If bat species are found roosting, permanent sealing will not occur until the fall, when bats have left the buildings for the winter. If surveys conducted during the fall do not reveal bat species, then rehabilitation activities should occur within three days in order to prevent the destruction of bats that move into the area after the survey.”
3. On page 67, replace entire second paragraph with: “Several species of bats use buildings in GTNP for roosting and maternal sites. During a 2003 and 2004 survey in GTNP, seven species of bats were documented (Table 8). Some of these species are known to have their maternal roosts in buildings while others roost strictly in trees. Two of these species have been observed roosting in

numerous buildings within the park such as the Murie Ranch cabins, park in-holdings, and cabins at Lupine Meadows.”

4. On page 67, add as first row on Table 8:

Townsend's big-eared bat	<i>Corynorhinus townsendii</i>	Buildings
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5. On page 67, replace entire fourth paragraph with: “However, three bat species (Little brown bat, Big brown bat, and Townsend's big-eared bat) were found in several of the White Grass Ranch buildings in a follow-up survey conducted on August 8, 2004. A bachelor *Corynorhinus townsendii* (Townsend's big-eared bat) was observed day-roosting on the ceiling in a large northern room of the main cabin. Males and females do not roost together in the summer and only males were found in the buildings. Females typically roost in caves, therefore, it is likely there are some caves located in the proximity of the ranch. In addition, other bat species that do not roost in buildings, but in trees, may be found in forested areas adjacent to the project site. Additional surveys will be conducted prior to any work activity at White Grass Ranch in order to determine appropriate exclusion measures.”

AGENCY COMMENTS

Wyoming State Historic Preservation Office

In a letter dated October 7, 2004, the Wyoming State Historic Preservation Office (SHPO) concurred with Grand Teton National Park (GTNP) that implementation of Alternatives 2, 3, and 4 would have no adverse affect on site 48TE1138, the White Grass Dude Ranch Historic District. The SHPO concurred that Alternative 3 provides the historic property with the most flexible, economical and reasonable approach for rehabilitation and adaptive use. They also concurred that under Alternative 1, the White Grass Dude Ranch Historic District would continue to be adversely affected by deterioration and neglect.

U.S. Fish & Wildlife Service

In a letter dated October 12, 2004, the U.S. Fish & Wildlife Service (USFWS) stated that based on the information provided in the EA/AEF as well as the included grizzly bear mitigation measures and park bear management policy guidelines, they concur with the “may affect, but is not likely to adversely affect” determination for the grizzly bear, gray wolf, and Canada lynx. The bald eagle and yellow-billed cuckoo were dismissed from further analysis. This letter concluded informal consultation for the White Grass Ranch project pursuant to the regulations implementing the Endangered Species Act.

Wyoming Game and Fish Department

In a letter dated October 1, 2004, the Wyoming Game and Fish Department stated they had no additional amendments to their March 19, 2004 terrestrial wildlife and aquatic comment letter.

RESPONSE TO PUBLIC COMMENTS

Historic Preservation of Structures and Related Actions

Comment 1: Adaptive use is not necessarily historic preservation. Most people would define historic preservation as serving public interpretation and education, not serving as employee housing or other functions that may exclude the public.

Response 1: Historic preservation is defined as protecting, rehabilitating, restoring, and reconstructing districts, sites, buildings, structures, and objects significant in American history, architecture, archeology or culture. There are four methods of historic preservation described in the *Secretary of the Interior's Standards for the Treatment of Historic Properties*: rehabilitation, preservation, restoration, and

reconstruction. Rehabilitation is defined as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values. Rehabilitation emphasizes the adaptive use of historic structures. In rehabilitating the White Grass Ranch and adaptively using it as a training center, the NPS is achieving several goals: it is preserving a cultural resource through rehabilitation and adaptive use; it is establishing a training center that will in turn help to preserve additional historic structures in the Intermountain West; and it will eventually provide an interpretive opportunity for visitors to see historic preservation in action.

Comment 2: Placing a two-story log barn/shop south of the main cabin is not in keeping with the original White Grass dude ranch operation and would only serve to distance the site from its original character. If there must be a shop constructed, it should be built on the site of the original barn, and possibly a replica of the original barn.

Response 2: A storage facility is needed for the operation of the Western Center for Preservation Training and Technology (WCPTT). Because the original White Grass barn is no longer on the property, the donated JY Ranch hay shed will be moved to White Grass Ranch, placed on the south side of the main cabin next to the parking area, and used for storage. The hay shed is not in the historic district, but visible from it. It is architecturally consistent with the existing buildings and the SHPO concurred with the determination that there will be no adverse effect to the historic district if the hay shed is placed south of the main cabin.

Comment 3: The NPS should consider moving the White Grass cabins to another developed area within the park, such as Moose or Kelly.

Response 3: Relocation of the cabins away from their historic setting would destroy the contextual integrity of the historic structures and constitute an adverse effect to cultural resources, resulting in removal of the White Grass Dude Ranch Historic District from the National Register of Historic Places. The park does not seek to de-list any historic structures from the National Register of Historic Places. This action would also be contrary to the purpose and need for the action.

Comment 4: There is no need to expand the proposed historic district beyond the structures and immediate building area. Inclusion of the pasture as part of the historic district may result in future conflicts between cultural and wildlife uses.

Response 4: Two issues are at hand here: one is the identification of eligible or contributing cultural landscape features in the historic district; the other is the operation of the WCPTT and its relationship to the historic district. For purposes of cultural resource management, under Section 110 of the National Historic Preservation Act, the NPS must identify, evaluate, and nominate cultural resources (i.e. historic structures and cultural landscape features) to the National Register of Historic Places. In the case of White Grass Ranch, the historic structures have been identified, evaluated, and nominated to the National Register of Historic Places as the White Grass Dude Ranch Historic District. Yet, eligible or contributing cultural landscape features were not identified in the historic district at the time the original National Register nomination was completed. The designation of the White Grass Dude Ranch Historic District is an ongoing process, which the NPS is undertaking in consultation with SHPO.

The park believes that the remaining sagebrush-free pasture north and east of the buildings and the secondary White Grass road are contributing components and should be included in the historic district. Other elements, such as the irrigation ditches, and remaining roads do not retain integrity of workmanship or design due to neglect, weathering, and overgrowth. The NPS will formally evaluate the landscape features around the buildings and historic pasture to determine if there are any features eligible for listing in the National Register. If the NPS determines there are eligible features, the historic district boundary

will be adjusted accordingly and the National Register Keeper and the SHPO will be notified. However, the enlargement of the historic district boundary does not mean that the center of operations will correspondingly increase. The NPS plans to keep the center of operations for the Western Center for Preservation and Technology (WCPTT) in the vicinity of the buildings.

Comprehensive Planning and the NEPA Process

Comment 5: GTNP has a piecemeal approach to rehabilitation, reuse and development projects in the park. These projects should all be considered, proposed and evaluated in a comprehensive process.

Response 5: GTNP has done comprehensive planning on rehabilitation, reuse, and development projects in the past and will continue to do so in the future. *Management Plan for Buildings on the National Register of Historic Places 2000* resulted from a GTNP inventory of historic structures located within the park and further consultation with the public. In this document, each structure is assigned a "historic theme" and ranked to assist management in the decision-making process on how best to preserve and protect historic structures in the park. GTNP's *Historic Structures Treatment & Maintenance Plan 2003(Draft)* provides further guidance to decision makers on priorities, recommended treatment actions and associated costs.

Although these documents are referenced by management, it is important to stress that these ranked lists are used only as guidance and not as mathematical tools to preserve or eliminate historic sites. Current management takes preservation of historic structures seriously regardless of their historic themes and ranking and will address this topic further in the General Management Plan process beginning FY2006.

Comment 6: Alternatives should explore other ways for the NPS Intermountain Region to have such a center, including locating the center elsewhere in the Intermountain Region on or off NPS land.

Response 6: Alternatives considered but dismissed are discussed on page 27 of the EA/AEF, including locating the WCPTT elsewhere, both in or outside of the park. As described in the EA/AEF, other locations would not have provided facilities of the proper number, scope, and scale for the training and technology center. Furthermore, the location of the WCPTT at White Grass Ranch provides an opportunity to protect cultural resources in the park while developing a workforce with the skills required for proper preservation of the thousands of historic rustic and vernacular buildings in close proximity to White Grass Ranch.

Comment 7: The NPS should put the WCPTT in an already established area, such as Moose.

Response 7: The White Grass Ranch is an already established area which the NPS has not had the funding and resources to stabilize to the level that the current law and policy requires. The buildings have seriously deteriorated and are structurally unsafe. The White Grass Ranch has the facilities and infrastructure of the proper number, scope, condition, and scale for the training and technology center; and the center will provide the necessary labor and skills to rehabilitate this area. Although a portion of the WCPTT's operations will operate out of the maintenance area in Moose, it is not feasible for the entire WCPTT to be located in Moose. Locating the entire WCPTT at Moose would require the construction of new buildings which goes against Section 110(a)(1) of the National Historic Preservation Act which states, "*The heads of all Federal agencies shall assume responsibility for the preservation of historic properties which are owned or controlled by such agency. Prior to acquiring, constructing, or leasing buildings for purposes of carrying out agency responsibilities, each Federal agency shall use, to the maximum extent feasible, historic properties available to the agency.*" Please see page 27 of the EA/AEF for additional discussion of other alternatives considered but dismissed, including locating the training center elsewhere.

Comment 8: This agreement makes a long-term commitment to a non-profit entity within Grand Teton National Park.

Response 8: The WCPTT at White Grass Ranch is based on a partnership developed in the fall of 2003 between the Department of the Interior and the National Trust for Historic Preservation (NTHP). The agreement pertains to NTHP and the NPS partnering together on the White Grass Ranch project. The long-term commitment is to the preservation of historic structures, not to the NTHP. It outlines agreements between the NPS and NTHP that facilitate fund-raising activities by the NTHP. The WCPTT will be solely owned and operated by the NPS and managed by GTNP as part of its park operations. The NTHP will raise up to \$1 million for the project once a fundraising agreement is in place. Once initial construction is complete, the WCPTT will be a financially self-sustaining operation funded primarily by tuition from those attending courses.

Comment 9: Until such time as a new General Management Planning process is completed, GTNP must look back to the latest NEPA planning documents in the park to assess management directions. Until then, when two Park goals come into conflict GTNP must look to the Master Plan for guidance, which does not allow for the preferred alternative in the White Grass Ranch EA/AEF.

Response 9: The 1976 Master Plan does not adequately reflect cultural resource preservation values and direction. Until this is updated, GTNP will refer to all park and NPS guidance, laws, regulations, and policies that have been enacted, including those enacted since 1976. These include, but are not limited to, the Organic Act of 1916, NPS General Authorities Act of 1970, 1978 Redwood Amendment, *NPS Management Policies 2001*, DO-28: NPS Cultural Resource Management Guidelines, National Historic Preservation Act, Antiquities Act, Historic Sites Act, National Trust Act, and Archaeological Resources Protection Act (ARPA). The White Grass Ranch Rehabilitation and Adaptive Use EA/AEF preferred alternative is consistent with the planning and management guidance outlined in the 1976 Master Plan.

Comment 10: The area of the park in which the White Grass Ranch is located is a truly outstanding natural area (Class IV) and the creation of the WCPTT is inconsistent with the management prescribed in the Master Plan.

Response 10: The 1976 Master Plan employs a land classification system that categorizes land within the national park in six ways, which are described on pages 8 and 9 of the White Grass Ranch Rehabilitation and Adaptive Use EA/AEF. The White Grass Dude Ranch Historic District is part of the Class VI: Historical, which recognizes remains of prehistoric settlement and historic utilization. It is surrounded by Class III: Natural Environment land. Class III lands serve primarily as a buffer or transition zone and provide the setting for park's Class IV lands. The low density use of the WCPTT, combined with proper mitigation and management, will have little impact on ecological processes and therefore does not conflict with management of Class III lands. White Grass Ranch is located more than ¼ mile from the Class IV boundary, which is the same as the wilderness boundary defined in 1973. Class IV is designated for outstanding natural areas such as the Teton Range and the Potholes area. Within Class IV areas, management is directed toward the preservation of backcountry experiences. The White Grass Dude Ranch Historic District does not meet the criterion for an outstanding natural area and is not located in Class IV lands as defined in the 1976 Master Plan.

Comment 11: It is unfair and may be illegal for GTNP to tie all the action alternatives to a single predetermined future use of the site. In short, the NPS is defining the "Purpose and Need" for each of these projects [White Grass, Lucas/Fabian and McCollister] in such a way to preclude analysis of a full range of alternatives under NEPA.

Response 11: The Council on Environmental Quality regulations implementing NEPA requires an analysis of reasonable alternatives. Reasonable alternatives are defined as those that are technically and

economically feasible and that show evidence of common sense. They also meet project objectives, resolve need, and alleviate potentially significant impacts to important resources. As stated in the White Grass Rehabilitation and Adaptive Use EA/AEF on pages 2-3, the *purpose* is to preserve historic structures in GTNP and provide training for employees and others in western historic preservation techniques; and the *need* is defined as 2,044 historic structures within a 200-mile radius of GTNP are in need of preservation. The NPS proposed the White Grass Ranch location because it provided the proper number, scope, and scale for the preservation training center envisioned and the proximity of historic structures within the Intermountain Region. The proposed use of the White Grass Ranch was based on previous planning and professional judgment as outlined below.

All NPS units are required to survey and evaluate cultural resources for their eligibility for inclusion on the National Register of Historic Places. Grand Teton NP did those evaluations, and guidance and management objectives for those resources is documented in the *Management Plan for Buildings Listed on the National Register of Historic Places* (2000). This guidance presents a ten-year plan and framework for future management of the 34 National Register sites with buildings in the park. This document was used to make the determination by NPS cultural resource professionals that the White Grass Ranch was the only reasonable NRHP site that could be used that would meet the purpose and need for the project. All the other National Register sites either did not have the appropriate complex size, appropriate number of buildings, appropriate access and/or infrastructure, or were technically or economically infeasible to rehabilitate. The determination to propose this use of White Grass Ranch based on this data and information using management objectives established in previous planning efforts. As required by NEPA, NPS analyzed the effects of the proposed use of the White Grass Ranch for these purposes prior to implementing the proposal.

Comment 12: The National Park Service too broadly interprets Executive Order #13006 and the National Historic Preservation Act as they relate to the Adaptive Re-use, described in Management Policies 2001 (Sec. 9.1.1.4).

Response 12: As stated in NPS Management Policies 2001 (Sec. 9.1.1.4), Executive Order #13006 and the National Historic Preservation Act require federal agencies to consider the use of historic properties if it will help ensure the properties' preservation. Adaptive use of historic buildings should be considered before new construction, provided that (1) it can meet park objectives and current code requirements; (2) its use will not be an intrusion on significant natural or cultural resources; and (3) a cost savings will be realized. Executive Order #13006: *Locating Federal Facilities on Historic Properties in our Nation's Central Cities* and the National Historic Preservation Act are often used concurrently to address differing types of historic properties throughout the United States.

Comment 13: NPS Management Policies require that, "the preservation of cultural resources in their existing states will always receive first consideration" (Mgmt. Pol. 2001 Sec. 5.3.5).

Response 13: *Management Policies 2001* Sec. 5.3.5, begins with, "The Park Service will provide for the long-term preservation of, public access to, and appreciation of, the features, materials, and qualities contributing to the significance of cultural resources." Decisions regarding appropriate treatments of these areas will be reached through the interdisciplinary planning and compliance process. The categories of ultimate treatment are preservation (stabilization), rehabilitation, restoration, and reconstruction. In this case, preservation of White Grass Ranch in its existing state was analyzed in Alternative 1, the No Action Alternative, and it was found that it did not meet the purpose and need for the project. The buildings may still continue to deteriorate and the park may be at risk of irretrievably losing structures listed in the National Register of Historic Places. If visitors do not respect established barriers and closures, they may be at risk of injury from collapsing walls and/or roofs or from diseased rodents when visiting White Grass Ranch.

Comment 14: Adaptive re-use as described in the White Grass proposal, could very easily cause adverse effects to historic structures under these statutes [36 CFR Part 800.5(1), Management Policies 2001]

Response 14: GTNP has consulted with SHPO regarding all construction plans and will continue to do so throughout the duration of the project. Additionally, all construction will comply with the guidelines of the *Secretary of the Interior's Standards for the Treatment of Historic Properties*; therefore, there will be no adverse effect under §106 of the National Historic Preservation Act. (See 36 CFR Part 800.5(3)(b).

Comment 15: Before any NEPA had occurred for this project, Secretary Norton signed an agreement with the National Trust for Historic Preservation (NTHP) committing NPS to develop the WCPTT; therefore, an agreement was made without public input.

Response 15: The WCPTT at White Grass is based on a partnership developed in the fall of 2003 between the Department of the Interior and the National Trust for Historic Preservation (NTHP). The Agreement between the NPS and the NTHP does not bind the agencies to a particular action. The actions under this agreement include activities such as providing data and information, providing recognition, attending meetings, submitting and implementing plan materials, and other such administrative actions in support of fundraising. Under NPS procedures, this action is a categorical exclusion for which no documentation is necessary, as described in §3.3H of Director's Order-12, *Conservation Planning, Environmental Impact Analysis, and Decision-Making*. That exclusion reads "Activities that are educational, informational, advisory, or consultative to other agencies, public and private entities, visitors, individuals or the general public." Furthermore, the Agreement stipulates:

- C. 3. "Activities undertaken pursuant to this Agreement are subject to, and must be consistent with, all applicable laws, regulations, NPS planning documents, and NPS policies, as they currently exist or as amended, supplemented, or superseded.
- C. 4. "The NTHP will not begin or publicly announce the fundraising campaign under this Agreement unless and until: a. The NPS confirms, in writing, that the necessary contractual, legal, and policy [including NEPA] requirements respecting the project have been appropriately addressed and is prepared to pursue the project."

Comment 16: The methodology and quantitative analysis as it pertains to which alternative in the EA is the "Environmentally Preferred Alternative" is faulty. Goal #3 (Attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences) is not met under Alternatives 3 and 4 and the quantitative analysis performed should be re-assessed in this light.

Response 16: The NPS selected Alternative 3, the preferred alternative, as the environmentally preferred alternative because it best promoted the policies in the NEPA Section 101 (b). The environmentally preferred alternative is the alternative which causes the least damage to the biological and physical environment and best protects, preserves, and enhances historic, cultural, and natural resources. When considering the environmentally preferred alternative, the NPS considers the relative merits of each alternative in relation to the six Section 101 goals, rather than using a quantitative "scoring system." Pages 35 and 36 of the EA/AEF describe this process.

Alternatives 3 and 4 meet Goal #3 because these alternatives allow for all 13 buildings to be rehabilitated and adaptively used without environmental degradation or other unintended consequences. Alternative 1 (No Action) does not meet Goal #3 because it fails to adaptively use historic structures, thereby failing to attain the widest range of beneficial uses. Alternative 2 (Minimum Basic Functions) minimally meets Goal #3 by having staff and trainees on site to interact with area visitors, but fails to fully meet other goals. However Goal #3 is better met in Alternative 3 because it allows the NPS to have staff and trainees

on site for the longest period of time to develop a better on-site training program and to interact with visitors in the area.

Resource and Cumulative Impacts

Comment 17: Because of the proximity of White Grass Ranch to wilderness, the WCPTT should be managed as a “quiet zone” in which human activities are non-intrusive on the external environment. Implement an area use plan that includes methods and rules to preserve natural sound, limit light pollution, minimize excessive motor vehicle traffic to and from the site, and render as unobtrusive as possible human impacts emanating from the cultural area.

Response 17: The NPS recognizes that White Grass Ranch is approximately 0.8 miles from recommended wilderness in the park. As a result, park staff developed several mitigation measures on pages 29 and 30 of the EA/AEF that are designed to limit the impacts of sound and light from activities at White Grass Ranch on wilderness users. Also, the main carpentry/masonry shop for the training center will be located in the Moose maintenance area, removing much of the sound and light-generating activities from White Grass Ranch. The WCPTT will also consider providing educational materials to students to teach them techniques on natural sound preservation and measures to limit light pollution, since these apply to many historic areas.

Comment 18: We believe there is no compelling reason to reconstruct the pole and rail fence around the White Grass Ranch. With no livestock contemplated at the ranch, construction of fences serves no practical value and adds to cost and maintenance demands. More importantly fencing would contribute to added wildlife impacts in the area.

Response 18: The EA/AEF stated a post and rail “wildlife friendly” fence (designed and maintained using recommendations developed by the Jackson Hole Wildlife Foundation) would be placed in its historic location around the immediate perimeter of the buildings to help delineate the center of activity and help prevent social trailing. However, the NPS has decided to employ other mitigation measures to control social trailing, instead of building a fence. Education on social trailing will be provided on an outside kiosk describing the appropriate boundaries and trails in the area for visitors. Students visiting the center will be provided the same information as part of their orientation during their stay at the ranch.

Comment 19: The area of the White Grass Ranch has had little human activity in the past twenty years, and as a result a great abundance of wildlife uses it as habitat - elk, deer, black bears, moose, ruffed grouse, and many other bird species. With the analysis presented in the EA/AEF, the project would have greater than negligible to minor impacts on wildlife. The park should consider the preparation of an EIS to assess the impacts to wildlife resources.

Response 19: The NPS recognizes that the White Grass Ranch area also draws people who are interested in observing elk behavior, particularly during the rut, and that visitors have concerns with human activities associated with the operation of the WCPTT. The criteria used to assess impact levels on wildlife are described on page 68 of EA/AEF. Generally, the significance of predicted environmental affects determines the appropriate level of NEPA. If significant impacts are anticipated then an EIS is prepared. While a variety of wildlife use the White Grass Ranch project area throughout the year and the proposal is likely to alter habitat availability and effectiveness for some species, it is our professional judgment that such impacts would not occur at the population level (i.e. result in long-term changes to productivity or survival leading to population declines) or occur at a regional scale. In assessing the significance of the predicted impacts we considered the direction, scope, duration, frequency, and magnitude of the impacts which would occur during different phases of the project (i.e. construction, operation, etc.). The seasonal nature of the WCPTT’s operation and its limited size, together with mitigation measures specifically designed to limit human impacts, will prevent major, adverse impacts to

elk and other wildlife. The USFWS concurred with the “not likely to adversely affect” determinations made for grizzly bears, wolves and Canada lynx.

Comment 20: All projects listed in Cumulative Impact Scenario (p. 38) in combination, will have long-lasting, irrevocable adverse effects upon wildlife and wilderness in the area. Alternatives 3 & 4 have the potential to have a major adverse effect upon a natural resource (i.e. wildlife), and thus deserves a more thorough wildlife impacts analysis than exists within the EA.

Response 20: The primary direct and indirect effects of the preferred alternative on wildlife identified in the EA/AEF are related to changes in habitat effectiveness and availability. These impacts were predicted to be negligible to minor for T&E species and other wildlife and are unlikely to rise to the population level (i.e. result in long-term changes to productivity or survival leading to population declines). These determinations are based on the impact level criteria described in the EA/AEF. Cumulative effects are defined as changes to the environment that are caused by an action in combination with other past, present and future actions. To assess the potential for and the level of cumulative impacts we addressed several key questions- whether other land use activities in the project area are having similar effects. If so, do the direct project effects have potential to overlap with or incrementally add to other land use activities in a meaningful fashion and do the project contributions to regional cumulative effects have the potential to measurably change the health of wildlife species of interest. The EA/AEF acknowledges that the project impacts would be additive to impacts from other land use activities, but again impacts are unlikely to adversely affect populations. This conclusion was reached after considering the background conditions and specific circumstances under which effects could occur (e.g. species abundance, whether essential habitat components would be affected, availability of similar habitats nearby, etc.) and the magnitude, frequency of occurrence, duration (i.e., long-term versus short-term), and geographic extent (i.e., site-specific versus regional).

Comment 21: All cumulative impacts should be analyzed according to the same cumulative effect boundary. Otherwise, one could easily make the argument that the Park is purposefully creating bias within the effects analysis to artificially “lessen” impacts to certain resources.

Response 21: Cumulative effects for the project were established by first considering the geographic area of influence for the affected resources. It is neither technically or scientifically accurate to select one cumulative effects boundary for all resources, as all resources have different effects boundaries. The spatial boundary selected for a cumulative effects assessment or the cumulative effects analysis area should be resource specific and in the case of wildlife ecologically relevant. A rule-of-thumb in cumulative impact analysis for wildlife is to scale the CEAA to the mobility of the species and its habitat preferences/needs. For example, wide-ranging carnivores typically have large home ranges, can travel large distances, and are habitat generalists. As a result, we chose large areas in which to address cumulative effects for these species. Conversely, cumulative effects for species that have smaller home ranges, are less mobile, or that are habitat specialists are assessed by using specific habitats within smaller areas. Cumulative effects are considered on wildlife populations, not on individuals. The entire park and even beyond was used as the area to assess cumulative effects to historic structures and cultural landscapes, wildlife, and wilderness. These resources have boundaries that extend throughout the park in such a matter that the effects at White Grass Ranch could potentially have a cumulative affect on these resources throughout the park. Further information on the cumulative impact scenario for the park is found on pages 38 and 39 of the EA/AEF.

Traffic on Moose-Wilson and Death Canyon Roads

Comment 22: This project would increase traffic along the Moose-Wilson Road and Death Canyon Road, both of which are narrow roads. Keep Death Canyon Road as primitive as possible. If necessary, establish a parking lot on the Moose Wilson Road.

Response 22: Under all alternatives, previously scheduled routine maintenance on the Death Canyon Road will occur, including grading and gravel added to stabilize the road surface and improve drainage. Improving the entire Death Canyon Road to the trailhead may increase visitation beyond the capacity of the trailhead parking lot, therefore only 0.8 mile beyond the pavement will be improved as part of this routine maintenance project. This project will allow traffic to progress to a turn-around point if they do not desire to travel the remaining distance of the road to the Death Canyon Trailhead parking lot. The scheduled routine maintenance will not widen the road or affect its primitive appearance. Signs will be posted warning visitors that the remaining portion of the road is a 4WD road experience.

Although activities at White Grass Ranch are anticipated to increase slightly, traffic along Death Canyon Road is expected to stay relatively the same with the addition of a visitor contact station and parking lot on the JY Ranch property along Moose-Wilson Road. The WCPTT staff and trainees will car- or van-pool to the site to minimize traffic impacts to the area. Access to Phelps Lake will be easier and likely a shorter hike through a trail system located at the new parking lot on the JY Ranch property. However, increased visitor use of Moose-Wilson Road is inevitable with the expansion of Teton Village directly to the south of the park along Moose-Wilson Road, the construction of a new Moose Visitor Center, and the addition of a visitor contact station on the JY Ranch property. As part of the upcoming General Management Plan (GMP) process scheduled for fiscal year 2006, data collected during the pilot studies proposed at Moose-Wilson Road will be used to assess traffic volume and flow issues and make permanent decisions for the Moose-Wilson corridor and associated side roads and trails.

Public Access and Interpretation

Comment 23: Would there be public access to White Grass Ranch?

Response 23: Yes. White Grass Ranch will remain open to the public. The park's cultural resource and interpretive staff will work on methods to interpret the history and evolution of White Grass Ranch from a dude ranch to the Western Center for Preservation Training and Technology. This planning will be done in consultation with those who are familiar with the ranch and who have offered their stories and historical artifacts. The Jackson Hole Historical Society and Museum invited researchers from the project to use the collections from the museum in rehabilitating the ranch, including historical photographs and other memorabilia. Numerous people with past affiliation to White Grass Ranch have offered and have donated stories and pictures to help with this effort. Opportunities will remain available for visitors who are not in training at the center to experience this area and its historical significance.