National Park Service
U.S. Department of the Interior

Yellowstone National Park
Wyoming, Montana, Idaho

Lake Area Comprehensive Plan/Environmental Assessment
FINDING OF NO SIGNIFICANT IMPACT

The purpose of the LACP/EA is to enhance visitor experience and provide for adequate employee accommodations while preserving the natural, cultural, and visual resources in the Lake Area by setting desired future conditions for resources and visitor experience and guiding development while minimizing impacts to resources. The need for the comprehensive plan originates from a backlog of regular infrastructure upgrades, as well as from ongoing and future changes to natural systems, improvements needed in pedestrian and vehicular circulation, changing visitor and employee facilities, and to provide guidance for future development. Conditions affecting habitat for threatened and endangered species have changed and increased knowledge has provided information relative to the management of several species. Resource mapping has been conducted within the planning boundary, providing consolidated data for planning reference.

As facilities age and resources evolve, some services, facilities (buildings, roads, and parking areas), and utilities in Yellowstone's developed areas may also need to change. These changes may be in the form of upgrades, restoration, removal, and/or adaptive reuse and may have the potential to impact the park's natural, cultural, and scenic resources and visitor experience. The comprehensive plan provides a framework for decision-making that NPS staff, managers, and partners will use when developing and evaluating project proposals for the Lake Area. The plan defines desired future conditions for resources and visitor experience that are based on the area's significance and fundamental resources and values. The plan sets acceptable limits of change for development projects that support these desired future conditions. Rather than evaluating projects individually, YNP has prepared a comprehensive assessment of future projects and the environmental impacts of those actions. The plan identifies suitable locations, building sizes, functions, and design standards for those projects and ensures that they fall within the area's acceptable limits of change. Impacts assessed in this plan are for the proposed actions as described in the document. Future actions will be evaluated in terms of consistency with the plan, level of impact to resources, and appropriate level of compliance, and documented as described in Section 1.5.7 and Appendix E of the EA.

SELECTED ACTION

The Preferred Alternative as described in the Environmental Assessment is the Selected Action. The Selected Action proposes moderate development in the Lake Area in order to better meet resource and visitor issues and needs. This alternative provides planning zones, prescriptions, design standards, and projects that guide a net gain of 121,000 square feet (2.8 acres) of building development and 278,000 square feet (6.4 acres) of pavement. This Comprehensive Plan looks at the development and infrastructure on the northwest shore of Yellowstone Lake. The Lake Area is an important location for visitor services on the Grand Loop Road and the East Entrance Road. For the purposes of this plan, the Lake Area has been divided into six separate planning locations where the area's features and facilities are clustered: Fishing Bridge, Lake Administrative, Lake

Lodge, Lake Hotel, Lakeshore, and Bridge Bay. Implementation of this alternative would have moderate adverse impacts to special status species, historic structures, and cultural landscapes. For full project descriptions see Chapter 2 of the Environmental Assessment.

Fishing Bridge
The proposed action in the Fishing Bridge area includes the Fishing Bridge Museum, general store, service station, ball field, Fishing Bridge RV Park, and fire camp. The proposed action includes:

- Retain, rehabilitate, and expand the Fishing Bridge Auto Repair Shop
- Retain and rehabilitate Fishing Bridge Service Station
- Retain and rehabilitate Fishing Bridge Boy's Dorm for seismic stabilization
- Retain and expand Yellowstone Park Service Station (YPSS) dorm
- Retain remaining cabins and storage sheds in the Fishing Bridge location
- Renovate Fishing Bridge RV Park (within existing footprint) to improve safety and to accommodate larger vehicles.
- Renovate camper services building, comfort stations, and parking within existing footprint
- Widen road between the RV park and Fishing Bridge to accommodate a turning lane
- Retain and rehabilitate the Fishing Bridge warming hut
- Replace main water lines throughout location
- Maintain fire camp behind Fishing Bridge General Store until a replacement location is determined
- Reclaim/restore native vegetation behind general store.
- Modify Pelican Creek Nature Trail to protect rare plant habitat

Administrative Location
The proposed action in the Administrative location includes the operational facilities north of the Grand Loop Road. The proposed action includes:

- Construct the equivalent of 40 bedrooms for NPS housing in multiplex units
- Replace Utah Dorm with new dormitory of approximately same size
- Consolidate and expand maintenance and storage facilities
- Construct animal-proof recycling and garbage transfer station
- Update, improve, and expand water tank and utilities throughout the Lake Area
- Construct office/Emergency Services Building (ESB)
- Construct community/recreation center

Lake Lodge
The proposed action in the Lake Lodge location includes the Lake Lodge, Lake Lodge cabins, employee pub, Seagull Dorm, and concessioners' administrative area. The proposed action includes:

- Move Lodge cabins away from Lodge Creek to alternative place within the Lake Lodge location
- Retain Lodge cabin road in current location
- Retain Seagull Dorm
- Retain and rehabilitate Pub facility
- Demolish Teal Dormitory and construct a new, approximately 60-room dormitory at site of Teal Dormitory

- Construct employee recreation hall in concessioners' administrative area
- Formalize pedestrian walkway with night lighting that meets Night Lighting Standards for employees between Concessions Administrative Area to Lake Lodge area

Lake Hotel
The proposed action in the Lake Yellowstone Hotel (Lake Hotel) area includes the hotel and the Lake Hotel cottages. The proposed action includes:

- Develop separate entry structure adjacent to rear of Lake Hotel to define entrance to structure
- Construct breezeway between Lake Hotel and the boiler room
- Provide elevator in main portion of Lake Hotel (backside)
- Conduct seismic stabilization for the Lake Hotel
- Construct maintenance building for concessions use behind Lake Hotel
- Retain and rehabilitate post office to conform to design standards
- Retain hotel cottages in current configuration
- Retain and rehabilitate the winterkeeper's cabin

Lakeshore
The proposed action in the Lakeshore area includes the service station, store, ranger station, Lake Fish Hatchery, housing, boathouses, dorms, and clinic (figure 4). The proposed action includes:

- Construct multiplex housing units to replace transahomes, which are at the end of their service life.
- Rehabilitate and adaptively re-use the historic Lake Service Station for visitor use
- Modify circulation between the Lake Hotel and Lake General Store
  Option 1: Open the road from the Lake General Store to the entrance of the hotel's porte cochere to pedestrian-only traffic.
  Option 2: Open the road from the Lake General Store to the T-intersection southwest of the hotel to pedestrian-only use. Only historic buses would be able to use the road to access the porte cochere during tour operations.
- Construct an entry kiosk (e.g., signage, orientation panels) with pull-out on south side of access road
- Enlarge the pedestrian viewing area to replace the existing platform in front of hotel
- Rehabilitate the Lake Ranger Station for year-round occupancy with public space
- Convert hatchery building to visitor use with limited parking and utilities
- Enhance picnic area near Fish Hatchery
- Rehabilitate clinic to conform with design standards
- Retain and rehabilitate both boathouses*
- Construct Emergency Services Building (ESB) near clinic

Bridge Bay
The proposed action in the Bridge Bay location includes the marina, campground, and surrounding trails. The proposed action includes:

- Construct 2 shower facilities in campground
- Construct a shower and laundry facility near the marina
- Relocate the marina fuel pump

- Install electrical hook-ups in Loops A-D of the campground
- Construct fence to separate humans and bears from the utility corridor near H Loop of the campground
- Improve marina bulkhead
- Dredge marina entry
- Retain campground circulation in current configuration
- Rehabilitate campground amphitheater
- Utilize darker colors to blend the transfer station building
- Construct storage facilities at the transfer station

MITIGATING MEASURES

Mitigation measures are listed in Appendix B of the FONSI package.

ALTERNATIVES CONSIDERED

Alternatives considered included a no action, two action alternatives and a no further change alternative.

In Alternative A, the No Action alternative, park managers would continue to rely on direction from the 1974 Master Plan, 1988 Fishing Bridge Development Concept Plan, and the 1993 Lake/Bridge Bay Development Concept Plan for planning guidance in the Lake Area. A comprehensive plan for levels of acceptable change (including planning zones, planning prescriptions, and design standards) would not be developed and therefore, projects not evaluated in past plans would be evaluated on a case-by-case basis. Updated desired future conditions, fundamental resources and values, and area significance statements would not be identified to guide future development. Projects from these plans that have not been completed are analyzed in this alternative, which would result in a net increase of 127,000 square feet (2.9 acres) in building footprint and 270,000 square feet (6.2 acres) net increase in pavement. Implementation of this alternative would have moderate adverse impacts to special status species, historic structures, cultural landscapes, and park operations.

Alternative B, the Preferred Alternative, proposes moderate development in the Lake Area in order to better meet resource and visitor issues and needs. This alternative provides planning zones, prescriptions, design standards, and projects that guide a net gain of 121,000 square feet (2.8 acres) of building development and 278,000 square feet (6.4 acres) of pavement. Example projects include pedestrian-only traffic between the Lake Hotel and Lake General Store and moving Lake Lodge cabins away from Lodge Creek. See the full project list in Chapter 2. Implementation of this alternative would have moderate adverse impacts to special status species, historic structures, and cultural landscapes.

Alternative C, the second action alternative, also proposes moderate development in the Lake Area to better meet resource and visitor issues and needs. However, it accomplishes this with planning prescriptions and projects that are different from Alternative B and guide a net gain of 116,000 square feet (2.7 acres) in building development and 335,000 square feet (7.7 acres, mostly within the existing footprint of the Fishing Bridge RV Park) in pavement. It also proposes additional visitor services such as more laundry facilities at the Bridge Bay Campground and a floating pier for visitor use near the historic Fish Hatchery. Implementation of this alternative would have moderate adverse impacts to special status species, historic structures, and cultural landscapes.

An alternative that examined no further change to visitor services, facilities, and utilities was considered for inclusion in the LACP/EA. Of the five objectives listed in Chapter 1 of the LACP/EA, this alternative would partially meet two but would not meet the other three objectives. In order to continue to support those who visit this portion of the park with the existing range of visitor services in a way that preserves and even improves natural, cultural, and visual resources, changes to development would have to be proposed. For these reasons this alternative was dismissed from further analysis.

Of the three evaluated alternatives, only Alternatives B (preferred) and C would meet all of the plan's objectives. Of these two alternatives, Alternative B best meets the objectives of the plan and the goal of enhancing visitor experience, employee working and living conditions while preserving the natural, cultural, and visual resources of the Lake area.

None of the alternatives would have more than moderate impacts to natural resources, including geology and soils, wetlands, vegetation and rare plants, water resources/water quality, wildlife, special status species, or climate change; to cultural resources, including archeological resources, ethnographic resources, historic resources, or cultural landscapes; or to social, economic, and visitor resources, including visitor use and experience, scenic resources, natural soundscapes, health and human safety, and park operations. Alternative B, the preferred alternative, will result in both short-term adverse and long-term beneficial impacts to these resources. None of the alternatives would result in impairment of park resources.

ENVIRONMENTALLY PREFERABLE ALTERNATIVE

According to the Department of the Interior regulations implementing NEPA (43 CFR 46.30), the environmentally preferable alternative is the alternative "...that causes the least damage to the biological and physical environment and best protects, preserves, and enhances historical, cultural, and natural resources. The environmentally preferable alternative is identified upon consideration and weighing by the Responsible Official of long-term environmental impacts against short-term impacts in evaluating what is the best protection of these resources. In some situations, such as when different alternatives impact different resources to different degrees, there may be more than one environmentally preferable alternative."

It has been determined that the No Action Alternative, Alternative A, would have considerable environmental impacts compared to the other action alternatives. Alternative A would have little effect on the biological and physical environment but would have an adverse effect on cultural resources. Under this alternative, 129 historic structures would be removed. The consolidation of cabins and relocation of the road away from Lodge Creek would help protect bears by reducing the potential for conflicts. The removal of all NPS and concessions overnight lodging in the Fishing Bridge area would also help to reduce potential impacts but would transfer impacts to other locations within the study area. Construction of a service station, repair shop, two dorms, and a post office would require removal of approximately four acres of trees and expand into an unoccupied meadow. This alternative would increase the human footprint in the Lake Area and increase congestion in the area as all traffic needing these services would be routed into this area. Because of the impacts associated with Alternative A, it is not the environmentally preferable alternative

Alternative B and C both offer benefits in the areas of conservation, restoration, and interpretation and therefore, these alternatives are consistent with fulfilling the criteria listed under Section 101 of NEPA. Alternative B proposes less building and pavement footprint than Alternative C (9.4 acres vs. 10.4 acres). Both alternatives are, for the most part, consistent with past planning decisions,

although there are some differences that result in fewer impacts to both natural and cultural resources and visitor services. Rather than remove 129 remaining historic buildings, Alternative B would not remove any historic structures, whereas Alternative C would remove two (Winterkeeper's residence and Lodge personnel office). Rather than removing historic Lodge cabins and constructing motel-type units, Alternative B proposes to relocate the historic Lodge cabins closest to Lodge Creek and consolidate them closer to the historic Lake Lodge, whereas Alternative C would leave the cabins in place with the current seasonal closures. In addition to proposals in Alternative A to rehabilitate historic structures throughout the Lake Area, both Alternatives B and C would also retain and rehabilitate the historic Pub facility (HS-4053) and both historic boat houses (HS-0734 and HS-4314). Both alternatives B and C propose to retain the 96 historic Lake Hotel guest cottages rather removing them and replacing them with motel-type buildings, as proposed in Alternative A.

As additional conservation measures, both action alternatives address a potential human-bear conflict in the Bridge Bay Campground. Alternative B proposes fencing to keep visitors out of a powerline corridor, which is often used by bears. Alternative C proposes moving the powerline so it is routed around the campground. Both action alternatives deal with winter storage of garbage. Alternative A does not address the replacement of aging utilities such as water tanks and water lines. Both action alternatives address these utility upgrades that provide for health, life, and safety improvements. They also reduce the impacts to resources from failing utility lines. Selecting the environmentally preferable alternative need not be the same as "preferred alternative" for implementation. However, based on the analysis in the EA, Alternative B, as well as being the preferable alternative, is also in this case the environmentally preferable alternative. This determination is made not only due to the improvements and upgrades that would resolve the natural and cultural resource and safety impacts discussed above, but also due to the adoption of buildable planning zones, planning prescriptions, and design standards. Zones that allow development, along with development footprints and design standards, are designated tightly around existing facilities while zones that restrict development are designated for the remainder of the developed area. Design Standards implement the Secretary's Standards for Historic Structures and other design criteria such as night lighting standards.

Alternative A would have a minor, beneficial effect on natural resources, but would have the greatest impact on cultural resources. Alternative B offers the most benefit for cultural and natural resources. Alternative C has less of a benefit to natural resources than Alternative B, but the same as Alternative A. Alternative C would also have an impact on cultural resources, but not to the extent of Alternative A. For these reasons, Alternative B causes the least damage to the biological and physical environment and best protects, preserves, and enhances historical, cultural, and natural resources, thereby making it the environmentally preferable alternative.

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 context and intensity of an action. Context refers to the affected environment in which the proposed action would take place. Intensity refers to the severity of a proposed action and is determined by the following factors:

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

The proposed action would have moderate adverse effects to Special Status Species and the potential for minor to moderate effects to Archeological Resources. All other adverse impacts

would be negligible to minor. Minor beneficial effects would occur to Geology and Soils, Water Resources/Water Quality, Visitor Use and Experience, Scenic Resources, Health and Human Safety, and Park Operations. The proposed action will not have significant effects to the human environment.

Geology and Soils: Due to construction and construction-related activities, the proposed action would result in both adverse and beneficial minor land disturbances that would alter topography, geology, and soils within the project area. A majority of the disturbance would be within previously disturbed areas.

Wetlands: The potential impacts from installation of electrical lines at Bridge Bay Campground and repair/replacement of utilities throughout the Lake Area would be minor, adverse, both short- and long-term.

Vegetation and Rare Plants: Due to the removal of vegetation associated with the RV Park Improvements, Fishing Bridge road widening, and the replacement of the Fishing Bridge water main, impacts would be minor, short- and long-term adverse.

Water Resources/Water Quality: The proposed action would remedy some of the existing erosion areas and conditions that lead to degradation of water quality. Replacement of the water main at Fishing Bridge and the water tank in the administrative location would have a beneficial effect on water resources due to the reduction in loss from leakage. Bulkhead and overlook improvements and dredging at the mouth of the marina would have a minor, temporary adverse impact. The increase in impervious area from construction would result in an associated relatively minor increase in stormwater discharge intensities and volume. Overall, implementation of the proposed action would result in minor, short- and long-term adverse and beneficial effects to water resources/water quality.

Wildlife: Mainly due to disturbance and displacement, construction-related activities would result in minor, short-term adverse impacts to wildlife.

Special Status Species: The proposed action would have negligible impacts to the trumpeter swan, bald eagle, peregrine falcon, boreal toad, bison, and Canada lynx. A "may affect, likely to adversely affect" determination has been made for the gray wolf and the grizzly bear and a "may affect, not likely to adversely affect for the Whitebark pine. Overall, the effects to special status species would be moderate, short-and long-term adverse.

Climate Change: The proposed action is not expected to result in more than a negligible increase in GHG emissions.

Archeological Resources: Because of the potential for construction and/or maintenance activities to impact unknown archeological resources, the proposed action could result in negligible to minor adverse impacts to archeological resources.

Ethnographic Resources: The preferred alternative would result in negligible to minor, long-term adverse impacts to ethnographic resources. No specific impacts to ethnographic resources were identified, however Native American Tribes have long been associated with Yellowstone Lake and Yellowstone National Park.

Historic Structures: The repurposing of the Fish Hatchery and Lake Service Station may constitute an adverse effect, although appropriate uses and rehabilitation designs with on-going consultation with WYSHPO will follow the Secretary of the Interior Standards to avoid an adverse effect, reducing the impact to a no adverse effect, or minor impact. Changes to the Grand Loop Road Historic District in front of the potentially NHL eligible Lake Hotel and the widening the East Entrance Road Historic District would have the potential to cause an adverse effect. Ongoing consultation with the WYSHPO would occur as designs are developed and would result in minor, long-term adverse impacts to historic structures.

Cultural Landscapes: The alignment of the proposed waterline replacement, relocation of historic structures, repurposing of historic structures, construction of new structures, widening of East Entrance Road Historic District, and conversion of the former alignment of the Grand Loop Road in front of the Lake Hotel has the potential to adversely affect the cultural landscape, however appropriate design that follows the Secretary of the Interior Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes along with on-going consultation with SHPO would reduce this impact to minor, short- and long-term adverse.

Visitor Use and Experience: Construction activities would result in a minor, short-term, adverse effect on the visitor experience. Once construction is complete, the function of the buildings, roadways, and facilities of the park and its accessibility to all visitors would be improved, and provide a minor, long-term, beneficial effect. Overall, the effects would be minor and beneficial.

Scenic Resources: Construction of the proposed projects would create a minor, temporary adverse impact to scenic resources.

Natural Soundscapes: Construction activities would result in minor, short-term adverse impacts to natural soundscapes.

Human Health and Safety: The proposed action would result in short-term, negligible, adverse effects during construction but in the long-term make the Lake Area safer for pedestrians and vehicle occupants and result in a minor beneficial effect.

Park Operations: A minor impact on park management might occur in the short-term due to oversight of the projects that would be required as a result of implementation of this alternative. Circulation improvements that minimize human-vehicle conflicts, improvements to concessioner and visitor lodging, and replacement of the water tank and Fishing Bridge water line will have minor, long-term beneficial effects.

The degree to which the proposed action affects public health or safety

The proposed action would have beneficial effect to public health and safety. Due to a proposed lakeshore road design that would allow for a seasonal vehicle-free pedestrian area between the hotel and the ranger station, the vehicle/pedestrian conflict at the lake shore would be remedied with this alternative. Traffic congestion and vehicle/pedestrian conflicts in the Fishing Bridge area would be mitigated with the addition of a turn lane and pedestrian crossings. A new emergency services building would improve response to visitor safety. Adequate night lighting would be added in the Lodge cabin area. Lodge cabins would be consolidated away from Lodge Creek and would mitigate human-bear interactions. Replacing the water line in the Fishing Bridge area will decrease the fire hazard risk. Renovating the RV Park from back-in sites to pull-through sites will increase visitor safety. During construction, there is the potential for construction-related accidents, as during any construction project. During construction activities, a health and safety program

would be implemented by the construction contractors, based on industry standards for accident prevention. At a minimum, the construction health and safety program would comply with federal and local health and safety regulations. Because a health and safety program would be implemented for construction activities and the public would be excluded from entering construction areas, potential construction impacts on public health and safety would not result in any greater safety risk. Therefore, impacts to public health and safety related to construction activities would be negligible.

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 planning area contains five historic districts, a potentially eligible historic district, a National Historic Landmark, and a proposed National Historic Landmark. The action area falls under two bear management units and the threatened grizzly bear is distributed throughout the planning area. Habitat surrounding the action area contains high diet diversity for grizzly bears. Bridge Bay is described as having low-quality spring and summer grizzly bear habitat and moderate-quality fall bear habitat, based on vegetation mapping of the ecosystem relative to other areas. Fishing Bridge and Lake Village are described as having medium-quality spring grizzly bear habitat and high-quality summer and fall bear habitat. The proposed action would not remove any secure grizzly bear habitat, as identified under the *Final Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Ecosystem* and the *Grizzly Bear Recovery Plan*. Impacts to "unique characteristics" of the Lake Area would not be significant.

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

No effects have been deemed "highly controversial." The proposal to improve the RV Park and pave 7 acres of vegetated area generated the most comments. A total of 3,774 comments specifically addressed the RV Park. The majority of the commenters were against the improvements. Of the 3,770 against the RV Park improvements, 3,742 were form letters from a non-governmental organization. The original proposal allowed seven acres of new pavement. This was proposed as a worst case scenario since the final design has not been completed. The proposed design keeps and increases a vegetated buffer between RV spots and also improves visitor safety by converting back-in sites into pull-through sites. Additional analysis of the preliminary design resulted in a revised estimate of approximately 3.5 acres of new pavement in the RV Park. This will still allow expanded RV spaces, increased safety, and result in a reduction of approximately 33 RV spaces. The effects from the proposed RV Park improvements on the human environment are not highly controversial. Both the U.S. Fish and Wildlife Service and the Park's bear biologist support the RV Park improvements and agree that the effects to the grizzly bear would be beneficial. No grizzly bear habitat, including "secure habitat" would be affected by the RV Park improvements. Although there is disagreement over the proposed action, this disagreement is not highly controversial.

The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks

There were no highly uncertain, unique, or unknown risks identified in the EA.

The 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

No part of the proposed action would set a precedent for future actions. The proposed action would not induce growth or reduce obstacles to future growth.

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

No significant cumulative effects were identified for the preferred alternative.

The 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 planning area contains five historic districts, a potentially eligible historic district, a National Historic Landmark, and a proposed National Historic Landmark. The repurposing of Seagull Dorm, Lake Fish Hatchery, and Lake Service Station may constitute an adverse effect, although appropriate uses and rehabilitation designs with on-going consultation with WYSHPO would follow the Secretary of the Interior Standards to avoid an adverse effect, reducing the impact to a no adverse effect, or minor impact. Similarly, new structures and alterations to existing historic properties, if designed correctly and in on-going consultation with the WYSHPO and ACHP, would result in a no adverse effect. Changes to the Grand Loop Road in front of the potentially NHL eligible Lake Hotel and the East Entrance Road Historic District would also require careful coordination with WYSHPO and ACHP. Mitigation measures resulting from consultation could include such items as conservation measures to stabilize the site, structure, or building; Historic American Building Survey (HABS) level photography and/or as-built construction drawings; large-scale, in-kind replacement of historic fabric or use of simulated materials to replicate historic fabric; reuse of portions of the historic structure or building; and/or design of the new structure or building to preserve elements of form and function of the historic structure or building. Alternative B also contains design standards associated with the plan which provide mitigating measures in all locations of the plan.

Compliance with §106 of the National Historic Preservation Act will be completed as projects are funded and/or approved. The draft LACP/EA was sent to the WYSHPO, which resulted in a response letter received on March 6, 2012. In their response, the WYSHPO stated that they were pleased with the overall direction of the plan and as specific undertakings were initiated further consultation would be required. The proposed action would result in negligible to moderate adverse impacts to cultural resources.

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

The proposed action will adversely affect the threatened grizzly bear and the non-essential/experimental population of the gray wolf. A Biological Assessment was sent to the U.S. Fish and Wildlife Service with a "may effect, likely to adversely affect" determination and a request for incidental take. The request for incidental take was made in an attempt to consolidate take statements from the 1988 Fishing Bridge Development Concept Plan/EIS and the 1993 Lake-Bridge Bay Development Concept Plan/EA. The authorized incidental take was reduced from .72 bears per year (7 bears/10 years) to 4 bears for the life of the plan (2 bears/10 years) in the Lake Area. An incidental take of 4 gray wolves over 20 years was authorized. The U.S. Fish and Wildlife Service concurred with the determination in a Biological Opinion received in a letter dated March 20, 2012. The proposed action will result in moderate adverse effects to grizzly bears and gray wolves.

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

The proposed action would not violate federal, state, or local environmental protection laws.

PUBLIC INVOLVEMENT

Yellowstone National Park conducted scoping with the public, as well as interested and affected organizations and agencies. Public scoping for the Lake Area Comprehensive Plan began on July 6, 2010, with a media release and mailing to previously identified interested parties asking for help in identifying issues and concerns. Scoping meetings were held in the Lake Village, Cody, Wyoming, and Bozeman, Montana. Scoping was also done through the NPS Planning, Environment, and Public Comment (PEPC) website. Scoping ended on August 6, 2010. The scoping newsletter and the list of agencies and organizations contacted during preparation of the LACP/EA is included in Appendix A of the EA.

The environmental assessment was made available for public review and comment during a 31-day period ending March 2, 2012. Public meetings were held in Cody and Jackson, Wyoming and Bozeman, Montana. A total of 3,796 responses were received. Most responders supported the overall concept of the plan, particularly the retention and adaptive use of historic structures and pedestrian walkway in front of the hotel. 3,742 of the comments were form letters from a non-government agency.

Substantive comments to the EA centered on six topics: health and safety, management and operation, the National Environmental Policy Act, past plans, resources, and visitor use. These concerns resulted in few changes to the text of the environmental assessment and are addressed in errata sheets attached to this FONSI.

CONCLUSION

As described above, the preferred alternative does not constitute an action meeting the criteria that normally require preparation of an environmental impact statement (EIS). The preferred alternative will not have a significant effect on the human environment. Environmental impacts that could occur are limited in context and intensity, with generally adverse impacts that range from localized to widespread, short- to long-term, and negligible to moderate. There are no unmitigated adverse effects on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection law. Based on the foregoing, it has been determined that an EIS is not required for this project and thus will not be prepared.

Recommended: Daniel N Wenk — Superintendent — 4/11/2012 — Date

Approved: — Regional Director, Intermountain Region — 4/17/12 — Date

ERRATA SHEETS
LAKE AREA COMPREHENSIVE PLAN/ENVIRONMENTAL ASSESSMENT
YELLOWSTONE NATIONAL PARK

Substantive comments to the LACP/EA centered on six topics: health and safety, management and operation, the National Environmental Policy Act, past plans, resources, and visitor use. The topics, which are addressed below, resulted in minor changes to the text of the environmental assessment.

TEXT CHANGES

Page 9, section 1.3, 3rd bullet, add *There is also a need to renovate the RV Park to allow improved access for today's larger RVs and improve safety within the RV Park. The RV Park was built in 1963-64 and all sites were built to accommodate 30-foot recreational vehicles and truck-trailer combinations. The sites are back-in sites, which increases the chances of human-vehicle conflict, particularly with large vehicles. The purpose and need for upgrading the RV park is primarily due to the fact that the campground has received few improvements since its construction in 1964. Utility hookups are currently substandard, are unsafe, and do not meet code. The existing roads, built in 1964, are only a 2"-macadam overlay on a shallow base, and have severely deteriorated. All RV sites are 30 feet-deep and require vehicles to back in, which is unsafe for any size RV. The existing sites are set at a 60-degree angle, which requires several backing in/out movements, causing congestion for other vehicles waiting behind. The 1964 design constructed interior roads with small turning radii. The buffer space between each site is too narrow, while the very large vegetated interior islands allow grizzly bears to travel through the middle of the campground under the cover of trees and downed-trees. Early design concepts that showed solutions that expanded the overall RV campground footprint into formerly undisturbed areas were rejected. In order to remain within the existing overall footprint, subsequent design concepts utilized existing interior roads and employed the concept of a pull-through campsite that would accommodate a variety of vehicle sizes. This would reduce the need to widen interior roads and turning radii. The pull-through campsite solution resulted in the obliteration of the existing large interior islands. The park's bear biologist has shown a preference for obliterating these islands and encouraging bears to travel around rather than through the campground. The proposed design keeps a larger vegetated buffer between RV spots that will allow for a picnic table and some revegetation with seedlings. Over the long-term, these seedlings will grow into trees that will provide shade and soften the overall effect of the campground.*

Page 107, Section 3.1.5, Reptiles and Amphibians paragraph, add *The Columbia spotted frog has been the subject of long-term monitoring and research in the Lake Area. Since the early 1950s the spotted frog population appears to have declined, based on egg mass counts and surveys for newly-metamorphosed and subadult frogs (Patla and Peterson, 1999) Patla and Peterson attribute the decline to:*

- *Lodge creek headwater spring development (1970s and 1980s) resulted in loss of wetlands and surface water;*
- *Continued encroachment in frog habitat to maintain the water system;*
- *Hydrological changes to Lodge Creek due to water extraction and road reconstruction;*
- *Grand Loop Road reconstruction (1971), which fragmented breeding and overwintering sites;*
- *Livestock grazing and associated activities;*
- *Residential development, disrupting former habitat use and connectivity; and*
- *Human presence (i.e., trails, service roads, etc.)*

Page 107, section 3.1.6, Boreal Toad paragraph, delete last sentence "The last reported sighting of a Boreal toad was in the late 1970s around Natural Bridge."

Page 112-113, section 3.1.6, Grizzly bear paragraph, change "Three were from natural causes, 3 human caused and 1 unknown. Of the 3 human caused one was from management removal, one from road kill, and one accidental death during capture (USGS, 2011)." to "*Four were from natural causes, 2 human caused and 1 unknown. Of the 2 human caused one was from management removal and one was from road kill.*"

Throughout document: Reduce new pavement at the Fishing Bridge RV Park from 7 acres to 3.5. Also, this plan no longer recommends removing the Seagull Dorm. Instead, the structure will be adaptively re-used by the concessioner. There is one new project that did not appear in the draft LACP/EA: the addition of a small elevator at the back of the Lake Hotel in order to comply with the Americans with Disabilities Act.

Page 196-205, section 4.2.3.2, Impacts of Alternative B to Historic Structures, and section 4.2.4.2 Impacts of Alternative B to Cultural Landscapes, change impact analysis to reflect changes made to Alternative B such as addition of an elevator at the Lake Hotel and retention of Seagull Dorm. Due to the elimination of proposals to remove historic structures, the impacts of this alternative are reduced from moderate to minor impact. Any alterations proposed to historic structures and potentially eligible cultural landscapes may constitute a minor impact, or *no adverse effect* under §106 if proposed designs and materials follow the Secretary of the Interior Standards for the Treatment of Historic Properties with on-going consultation with the WYSHPO.

SUBSTANTIVE COMMENTS

Health and Safety

Comment: One thing that should be considered with the road is how to slow traffic down as it barrels through the area....rangers can't stay there all the time ticketing, something has to be done to slow the traffic to protect the pedestrian's and traffic entering.
Response: The final design for this project includes methods designed to slow traffic, such as raised pedestrian crosswalks with associated signage. The purpose for the road widening is to address traffic congestion and pedestrian safety in the Fishing Bridge area.

Comment: I'm also not certain about closing the drive in front of the Lake Hotel to vehicles: many older people and visitors stopping for a short period may well miss the view of the historic front of the hotel.

Response: The drive in front of the Lake Hotel is being closed to vehicles to improve the visitor experience in front of the hotel. Since only a short portion is being closed, visitors will be able to see the front of the hotel from parking nearby. Pedestrian and vehicle conflicts reduce the ability to provide seating and viewing of the lake in this location. Visitors will continue to drive to each end of this area and accessible parking and trails are provided to the front of the hotel and lakeshore.

Management and Operation

Comment: You need to address the Fishing Bridge now and set the plans and dates to build the new bridge across the Yellowstone River, before the bridge engineers decide it is not safe to travel over with vehicles. The old bridge should remain for people to walk across, watch trout etc.

Response: The Fishing Bridge was recently repaired. Federal Highway Administration engineers routinely monitor the bridge's condition, ensuring that it is in stable condition. Each bridge in the

park receives repair, maintenance and a schedule for replacement. Bridge replacement is not within the scope of this plan.

Comment: Preserve and renovate the Lake Ranger Station but public access should be limited. The building is currently used by law enforcement, ambulance crews and Resource Management. It is used for office space and needs to be left for their use. They need a place they can work without public interruptions.

Comment: I do not believe the Lake Ranger Station should be open to the public or be used as a year around facility. It serves very well now for law enforcement, ambulance crews and Resource Management. It now gives them a place to work away from the crowds.

Comment: Possibly create a combination visitor contact and permit station at Lake, but as much as I love people coming into enjoy the Octagon, it doesn't always mix with Law Enforcement responsibilities. I would include a deeper discussion on what the future for the ranger staff at Lake will be, and where they should locate year around.

Response: The Division of Resource and Visitor Protection, which includes law enforcement rangers, supports re-opening the Ranger Station to the public for permitting activities. This will still allow for portions of the operation to remain off limits to the public. Decisions regarding the future of ranger staffing levels in the Lake area are beyond the scope of this plan.

Comment: Perhaps a compromise would be parking and camping sites that are covered with heavy gravel (1" dia.). These would minimize mud, but would allow water to be absorbed by the ground instead of sheet runoff that encourages erosion and flooding.

Response: Permeable surfaces will be used wherever possible in the RV Park infill project; however, RVs require a firm surface for leveling and to support the additional vehicle weight. Rutting and surface failure would otherwise result. The original proposal was to allow seven acres of new pavement. This was proposed as a worst-case scenario because the final design has not been completed. The proposed design includes a vegetated buffer between RV spots and replaces back-in sites with pull-through sites. Further analysis of the proposed design has resulted in a revised estimate of approximately three and a half acres of new pavement in the RV Park. This will still allow expanded RV spaces, increased safety, and result in a reduction of approximately 30 RV spaces.

Comment: Why not combine Utah dorm space with employee small apartments in same building, reducing total building foot prints and concentrating physical impacts rather than diffusing them?

Response: The Utah dorm serves a different employee function than the multi-plex apartment units referenced elsewhere in the plan. This dorm serves groups of students or researchers who are working for short periods of time with a high turnover rates. A community kitchen and other community living quarters better serves this user group. The multi-plex apartments referenced in the plan will serve employees who will be employed for a longer season and need to house their personal items. All housing in this plan will be consolidated into multi-plex units wherever possible. However, design standards limit the footprint of any individual building.

Comment: May I request how my contact information can potentially be used publicly? Can you publicly be specific on this website how such info is used, and where it goes please?

Response: Your contact information will be made public should we receive a request for this information under the Freedom of Information Act (FOIA).

Comment: The park should be looking at removing vehicles from the park and using bus systems to move people around.

Response: The Park is currently participating with the Lynx transit system, which provides bus routes throughout the park and the surrounding communities. Large scale mass transportation plans are beyond the scope of this plan.

Comment: Sewer and water treatment facilities and capacities. Though water line replacement is included in the plan there is no mention that I could find, regarding water treatment facilities nor, even more importantly – sewage collection and treatment. Given the high water table and wetlands in the planning area, and thousands of daily residents I'd guess, assessment of the waste water utility is an integral component of any development activity in the area, especially within a National Park.

Response: Wastewater and other utilities were assessed in this plan. Those needing improvement were identified. This plan provides for the replacement of all water and sewer lines throughout the Lake Area. The existing wastewater treatment plant meets all standards and will be adequate for the foreseeable future.

Comment: Please show the number of National Park and concession employees who are in residence during the summer and winter season. Additionally show visitor capacity and population at peak season, and estimate the number of transient visitors (vehicles) through the area including commercial service traffic.

Response: The number of National Park and concession employees residing in the Lake Area totals approximately 746 in the summer and 18-20 in the winter. The visitor capacity for overnight lodging identified through the 1974 Master Plan and verified in the 2009 Commercial Services Strategy for the Lake Area has not been exceeded. The Fishing Bridge RV Park has 358 sites, the Bridge Bay campground has 438 sites, and the Lake Hotel and Lake Lodge have approximately 482 rooms. The plan reduces the number of RV sites by approximately 33 in the Fishing Bridge RV Park.

Recent traffic counts have been completed for the Grand Loop Road and the entrances, but not within the Lake Area. The nearest vehicle count occurs at the East entrance station. In 2011, the East entrance station recorded a high of 42,144 vehicles in July and a low of 265 vehicles in November.

Comment: Rather than reinventing the wheel on parking lot and walkway lighting in the Lake Hotel and Lake Lodge area and even at Fishing Bridge - look at the downcast lighting that is used in the Rossauer's Parking lot area west of Bozeman. Its attractive and durable and I think would fit the span of years architecture that is present at Lake.

Response: The park's policy regarding night lighting provides fixtures that meet the International Dark Sky Standards. These lights provide safe conditions for pedestrians while protecting Yellowstone's dark night sky and are included in the Design Standards in the plan. Any new lighting and changes to current lighting will meet these standards.

Comment: But one of the very highly used social paths that goes from the Sea Gull and Mallard Dorm needs improvement for employees to utilize it safely. I don't think you can get rid of it as employees really like it. The concessions lighting of pathways was a start but the posts with the lights projecting sideways basically only thru light sideways but not efficiently on the ground, and also where it was used behind the Lake Hotel to the dorms, the lights actually shine in drivers eyes at night. Some kind of downcast lighting would be preferable.

Response: The path described has been addressed in the plan. It will be formalized and additional lighting will be provided. The park's policy regarding night lighting provides fixtures that meet the International Dark Sky Standards. These lights provide safe conditions for pedestrians while protecting Yellowstone's dark night sky and are included in the Design Standards in the plan. Any new lighting and changes to current lighting will meet these standards. Retrofitting lighting is expensive and may occur over time as funding permits.

Comment: May I suggest that Planning develop a system for maintaining information about specific resource issues in the Lake area, if one does not currently exist? When a project comes up for evaluation, what methods are used to determine potential issues and specific resource concerns? Will this system outlast changes in personnel at YELL?

Response: A system for maintaining information about resources, footprint numbers and projects that have been completed does exist. When a project is evaluated, a project file is generated and linked back to the Lake Area Comprehensive Plan. Resource mapping will be continually updated. The process of evaluating future projects and the Park's continued responsibility under this plan is described in section 1.5.6 and 1.5.7 of the EA.

Comment: What upgrades, if any, are needed for the sewage system infrastructure over the 20-year planning period? Large sewage spills and overflowing treatment percolation ponds occurred 1998-2001; have the causes been remedied so that such spills will not re-occur? Is the power supply and backup generator sufficient to handle sewage transport/lift to the treatment facility, and increases in sewage output over the planning period? Do sewage lift stations need replacement under Alternative B? (The Lodge lift station produces odors; is that normal?) Why is the sewage treatment plant, so vital for the Lake area, left out of the planning boundary?

Response: The sewage system infrastructure was evaluated for inclusion in this plan. Recent upgrades have remedied the issues described. Power and generators were assessed in the plan and an additional generator is proposed for the Lake Hotel. An additional sewage lift station is proposed in Alternative B for the Fish Hatchery area should this facility be adaptively used in the future for a visitor function. This plan calls for the replacement of all sewer lines throughout the Lake Area. The odor near the Lodge lift station may have been due to an old pipe extension that has been remedied.

Comment: "I do have concerns about 3 items in the Lake Hotel segment: the breezeway between the hotel and boiler room and the maintenance building for concessions use behind Lake Hotel would add new building elements to the area that I'm not sure are really needed, especially in this era of fiscal restraints. The same could be said about renovation of the post office to conform to design standards, although I know it is an eyesore. Again, money is the issue.

I totally support your ideas for the Lakeshore area although with the caveat that if money is an issue, things like constructing new road behind the ranger station and constructing parking

between the ranger station and general store should be low priority. I also wonder about such a renovation of the hospital for the same reason."

Response: All changes to concessions operated facilities receive approval from the NPS to assure that such changes meet the intention of the law as "necessary and appropriate." The changes must also meet the standards for cultural properties. The breezeway would not be connected to the hotel, would follow the Secretary of the Interior Standards for the Treatment of Historic Properties, and would be designed in consultation with the Wyoming State Historic Preservation Office in order to avoid an adverse affect to the structure. Concession employees will move offices into the boiler building and the breezeway will make travel to and from their offices safer in all types of weather. This plan provides guidance for projects once funding becomes available; it does not prioritize projects.

Comment: Why is it necessary to have a community rec center in the administration area and the same thing (a concessionaire rec center) at Lake? Scrap one or the other--avoid duplication, save $$!

Response: The separate community recreation centers are necessary because; (1) YNP does not want to encourage concessions employees, who often do not have cars, to walk long distances through forested areas at night and, (2) the concessions administrative area is not open during winter for year-round employee wellness.

Comment: The EA should describe what change in overnight housing capacity for employees and concessioners is planned in the Lake Area. Then the EA should assess how this increase in human capacity (if there is one) is both necessary for enhanced management and for which there are no viable alternatives. This approach would conform directly to the stated standard in the Conservation Strategy.

Response: Overnight housing for concessions staff will not increase. The increase in overnight housing for NPS employees in the administrative area is analyzed and documented in this EA. The proposed overnight housing is a decrease from the need identified in past plans. Of the three alternatives, the proposed action contains the least amount of housing increase. Much of the proposed housing is replacement for housing that is currently substandard. Additional overnight housing for NPS staff is a result of a change in operations to address resource issues that present a significant threat to a range of park species, including some that are threatened and endangered. In order to house fishery staff and researchers housing must be increased in the Lake Area.

National Environmental Policy Act

Comment: A major shortcoming in the EA is the lack of clarity about the extent of the proposed plan, and the impetus driving some of the plan assumptions. It is not apparent to a casual reviewer that Yellowstone intends to essentially raze the existing Fishing Bridge RV campground, wipe out the existing tree islands, and dramatically expand the extent of pavement, with an additional 305,000 square feet, or 7 acres, of new asphalt. The first place the EA describes the removal of 7 acres of vegetation and the tree islands in the RV campground is on page 162 in the middle of a paragraph. The EA briefly notes that the rationale for this expansion is to accommodate "longer" vehicles, but it's not apparent that Yellowstone means to accommodate the largest RVs on the

road. From conversations, apparently the campground concessioner is among those ardently advocating for this conversion. The design standards in Appendix C are not informative about the dramatic changes proposed for the Fishing Bridge RV campground. There are no photographs of the existing RV park, and no sketches of the future condition, as is the case for the other elements of the Fishing Bridge location (and the other plan locations). The design standards describe retaining clusters of trees to blend facilities into surroundings (EA at 277), yet the plan requires clearing 7 acres of vegetation, including the tree islands that currently offer this very type of vegetative screening. The design standards contradict the development decisions outlined in the proposed plan.

Response: The environmental effects section (chapter 4) describes the effects of the proposed action. The proposed action is described in the alternatives considered section (chapter 2). The primary justification for upgrading the RV Park is primarily due to the fact that the campground has received few improvements since its construction in 1964. Utility hookups are currently substandard, are unsafe, and do not meet code. The existing roads, built in 1964, are only a 2"-macadam overlay on a shallow base, and have severely deteriorated. All RV sites are 30-feet deep and require vehicles to back in, which is unsafe for any size RV. The existing sites are set at a 60-degree angle, which requires several backing in/out movements, causing congestion for other vehicles waiting behind. The 1964 design constructed interior roads with small turning radii. The buffer space between each site is too narrow, while the very large vegetated interior islands allow grizzly bears to travel through the middle of the campground under the cover of trees and downed-trees. Early design concepts that showed solutions that expanded the overall RV campground footprint into formerly undisturbed areas were rejected. In order to remain within the existing overall footprint, subsequent design concepts utilized existing interior roads and employed the concept of a pull-through campsite that would accommodate a variety of vehicle sizes. This would reduce the need to widen interior roads and turning radii. The pull-through campsite solution resulted in the obliteration of the existing large interior islands. The park's bear biologist has shown a preference for obliterating these islands and encouraging bears to travel around rather than through the campground. The proposed design keeps a larger vegetated buffer between RV spots that will allow for a picnic table and some revegetation with seedlings. Over the long-term, these seedlings will grow into trees that will provide shade and soften the overall effect of the campground. The original proposal in the comprehensive plan was to allow seven acres of new pavement. This was proposed as a worst case scenario since the final design has not been completed. An analysis of the preliminary design has resulted in a revised estimate of approximately 3.5 acres of new pavement in the RV Park. This will still allow expanded RV spaces, increased safety, additional buffer space between campsites, and result in a reduction of approximately 33 RV spaces.

Comment: The EA's description of grizzly bear status under the Affected Environment section contains some inconsistencies. The table entitled "Human-caused grizzly bear mortality in Yellowstone National Park, 1980-2011" on page 113 reports a total of two human-caused bear mortalities in Yellowstone in 2010, but the text describes three. Perhaps the death caused during capture is not recorded on the table. A discussion of the 2011 mortality levels is also appropriate to incorporate into the EA.

Response: The inconsistency between the mortality numbers has been corrected. Since four of the five 2011 human-caused bear mortalities occurred in backcountry areas a discussion was deemed unnecessary.

Comment: The Biological Assessment for the Lake Area Comprehensive Plan/EA (BA) describes an approach to analysis at odds with the plain language of the Conservation Strategy. The BA states "there will be an increase in the administrative areas, however these areas are within existing development boundaries and are exempt from the Conservation Strategy restrictions." (BA at 37) This statement misreads the Conservation Strategy. The Conservation Strategy requires that the number and capacity of developed sites cannot be increased unless the impacts are analyzed and documented. Detrimental impacts must be mitigated. The Conservation Strategy's Developed Site Standard indicates that administrative site expansions are only exempt from the Conservation Strategy's mitigation requirements if both (1) "such developments are necessary for enhancement of management of public lands" and (2) "other viable alternatives are not available." Thus, administrative site expansions are not fully exempt from the Conservation Strategy, as the BA seems to say.

Response: The increase in housing in the administrative area is analyzed and documented in this EA. The NPS has identified that (1) "such developments are necessary for enhancement of management of public lands" and (2) "other viable alternatives are not available." The Lake area is 26 miles from the nearest external community, an unreasonable distance for maintaining park operations. Other developed areas have similar shortages in housing and disturbances to these areas would increase impacts due to employees driving early in the morning and at night. The main impetus for an increase in administrative housing is the fisheries program. In order to house fishery staff and researchers, housing must be increased in the Lake Area.

Comment: Because the EA lacks clarity around the impetus to clear and pave Fishing Bridge RV campground for the benefit of massive RVs, it fails to adhere to NEPA's requirements for analysis of alternatives. An adequate NEPA analysis would first identify the purpose and need to accommodate massive RVs, then would assess a range of reasonable alternatives to accomplish that purpose. Yellowstone has single-mindedly zeroed in on just one approach without assessing its options. A more reasonable option than the one selected by Yellowstone is to leave accommodation of these extremely large RVs to private operators on the perimeter of the Park. Visitors obviously can still drive their vehicles into Yellowstone. But there is no need for Yellowstone to size its infrastructure to accommodate overnight a minuscule number of visitors. As you know, the National Environmental Policy Act requires that agencies "rigorously explore and objectively evaluate all reasonable alternatives," as courts have noted, thereby "sharply defining the issues and providing a clear basis for choice among options by the decisionmaker and the public." (Greater Yellowstone Coalition v. Kempthorne, 577 F. Supp. 2d 183, 193 (D.D.C. 2008)). We do not believe the EA as written meets this test of definitely laying out the issues, and providing a clear basis for the choice of the preferred alternative.

Response: The purpose and need has been clarified and added to the errata sheet for text changes to the EA. The primary justification for upgrading the RV Park is due to the fact that the campground has received few improvements since its construction in 1964. Utility hookups are currently substandard, are unsafe, and do not meet code. The existing roads, built in 1964, are only a 2"-macadam overlay on a shallow base, and have severely deteriorated. All RV sites are 30-feet deep and require vehicles to back in, which is unsafe for any size RV. The existing sites are set at a 60-degree angle, which requires several backing in/out movements, causing congestion for other vehicles waiting behind. The 1964 design constructed interior roads with small turning radii. The buffer space between each site is too narrow, while the very large vegetated interior islands allow grizzly bears to travel through the middle of the campground under the cover of trees and

downed-trees. Early design concepts that showed solutions that expanded the overall RV campground footprint into formerly undisturbed areas were rejected. In order to remain within the existing overall footprint, subsequent design concepts utilized existing interior roads and employed the concept of a pull-through campsite that would accommodate a variety of vehicle sizes. This would reduce the need to widen interior roads and turning radii. Also, removal of the vegetated islands would encourage bears to travel around rather than through the campground. The original proposal in the comprehensive plan was to allow seven acres of new pavement. This was proposed as a worst case scenario since the final design has not been completed. An analysis of the preliminary design has resulted in a revised estimate of approximately 3.5 acres of new pavement in the RV Park. This will still allow expanded RV spaces, increased safety, additional buffer space between campsites, and result in a reduction of approximately 33 RV spaces. Based on the purpose and need, four alternatives were identified. A no further development alternative was initially considered but dismissed and as stated in section 2.3, would not meet any of the objectives. The No Action alternative would not renovate or improve the RV Park and larger RVs would continue to use facilities outside of YNP. This alternative would not the purpose and need identified above. Alternatives B and C both renovate the RV Park. Alternative B renovates the northern portion and Alternative C renovates the entire RV Park. Alternative B was chosen because it best met the purpose and need and had less impact than Alternative C. The intent of the EA is not to "provide a clear basis for the choice of the preferred alternative." The EA objectively evaluates the alternatives to allow the decision maker to make an informed decision.

Comment: The plan's recommended course of action to raze and pave the Fishing Bridge RV campground does not align with the plan's statement of purpose, need and objectives. The EA identifies five primary issues and concerns. None of these mention a need to accommodate massive recreational vehicles. In fact, the stated issue is that "visitor experience" needs to provide an appropriate level of use such that the park will remain unimpaired for future generations." (EA at 8) The EA does not provide supporting analysis about why or how more pavement for larger vehicles is an appropriate level of use to keep the park unimpaired for future generations. Most readers would equate more asphalt with increased levels of impairment. Under Objectives, the plan identifies "ensure visitor facilities support necessary and appropriate levels of service and enhance visitor experience in the Lake Area." Has Yellowstone made a determination that it is "necessary and appropriate" to convert Fishing Bridge RV campground into a paved parking lot? If so, the supporting analysis for this determination must be included in the EA for public review and comment. (EA at 9) Another Objective is to "preserve, and where possible, improve the natural scenery and soundscapes." (EA at 9) Converting Fishing Bridge RV campground into a paved parking lot is not consistent with this objective of improving natural scenery where possible. Campground visitors are unlikely to view elimination of the natural vegetation within the campground as an improvement of the natural scenery. Again, because the EA is not comprehensive in the consequences for the Fishing Bridge RV campground, there is no analysis of either consistency or conflict with the plan's objectives. We suggest increased clarity in a revised comprehensive plan. Yellowstone should directly state the Park's intentions and rationale for the Fishing Bridge RV campground. The EA should describe visually through photographs, sketches, and design standards, as YNP staff have described in public meetings and conservations, that the plan intends clearing the Fishing Bridge RV campground of all its trees and paving another 7 acres of ground to accommodate Greyhound bus-sized RVs. If the campground concessioner is a prime motivator of this planning direction, that should be revealed and discussed in the EA as well.

Response: The RV Park meets the criteria for "necessary and appropriate" and has since its installation in 1963-64. The 1988 Fishing Bridge EIS upheld that decision. The campground

concessioner identified deficiencies in the RV Park and informed NPS staff. Because the RV Park is an appropriate visitor use, NPS proposed and analyzed solutions to meet the purpose and need as identified in the EA. As described in previous responses the purpose and need has been clarified. The plan analyzes the impacts of infilling the RV Park within existing footprint with an additional 3.5 acres of pavement to provide for upgrades that address health, life, and safety issues. These solutions address today's RV sizes and requirements. Impacts from the proposed action as well as continued use of the RV Park are not unacceptable, nor do they impair park resources and values.

The National Park Service must weigh competing objectives and decide the best course of action. That is the benefit of an Environmental Assessment; it provides the decision maker an opportunity to make a fully informed decision.

Past Plans

Comment: Myself and my family implore you to remember the original plan of mission 66, which was to replace the fishing bridge complex with Grant Village.

Response: In the original plan of Mission 66, Grant Village was not included; the development post-dates the Mission 66 initiative. Grant Village was not constructed as a replacement for Fishing Bridge. The development of Grant Village was intended to become a supplemental visitor service area; an addition to existing developed areas in the park. During the preparation of the 1974 master plan, that intent changed. It was determined in the 1974 Master Plan, that Grant Village could instead replace comparable facilities in the Park (i.e., Old Faithful, Fishing Bridge, West Thumb).The Grant Village DCP was completed because the 1974 Master Plan recommended that fragile thermal areas at Old Faithful and West Thumb as well as the prime wildlife habitat of the Pelican Valley-Fishing Bridge area be converted to predominantly day use while "Grant Village will become a major development containing several classes of accommodations". Since the 1988 Fishing Bridge DCP/EIS, a majority of the infrastructure has been removed. In 1975, all but 23 of the 285 cabins were removed from the Fishing Bridge location. Of the 23, five cabins remain and are used by concession employees. The plan recommends that these historic cabins be retained as an example of previous development.

Comment: The Lake Area Comprehensive Plan should be considered in the context of Yellowstone's recent report to the UNESCO World Heritage Committee. Yellowstone's report "on the State of Conservation of its Property Inscribed on the World Heritage List" (January, 2012) describes the following: "A commercial services strategy has been developed to assist YNP in making business decisions that provide for appropriate visitor services while preserving park natural and cultural resources. The strategy will assist Yellowstone in making decisions related to concessions contracts, provide directions for developing funding priorities for future long-term concessions contracts, and ensure that visitor services provided under concessions contracts are consistent with park goals, statutory and regulatory requirements, park planning and NPS policies and guidelines." The EA includes no consideration of how razing and paving Fishing Bridge RV campground for the benefit of massive RVs interrelates with this commercial services strategy, and also how it provides for appropriate visitor services while preserving park resources. This paragraph in Yellowstone's report to the World Heritage Committee goes to the crux of the question about paving the park's natural resource amenities for the benefit of industrial-strength tourism. This type of analysis would also help reveal whether the campground conversion is being driven by the concessioner's interest or is motivated by NPS desires.

Response: As stated in the 2009 Commercial Services Strategy, the current level of concessioner operated facilities is considered "necessary and appropriate." The Fishing Bridge RV Park has met this test since 1963-64 when it was built. Prior to the expenditure of funds, the NPS must authorize any changes in facilities operated by the concessioner. The current condition of the Fishing Bridge RV Park does not meet code and presents an unsafe situation. The proposed upgrades occur within the existing footprint of the RV Park and reduce the overnight occupancy by approximately 33 sites. The analysis for how the RV Park renovation provides for appropriate visitor services as well as preserving park resources is in Chapter 4 of the EA. Impacts from the proposed action as well as continued use of the RV Park are not unacceptable, nor do they impair park resources and values.

Comment: However, many forms of recreation enjoyed by the public do not require a national park setting and are more appropriate to other venues. The Service will therefore - provide opportunities for forms of enjoyment that are uniquely suited and appropriate to the superlative natural and cultural resources found in the parks; - defer to local, state, tribal, and other federal agencies; private industry; and nongovernmental organizations to meet the broader spectrum of recreational needs and demands. The Lake Area Comprehensive Plan EA is critically lacking in context with the relevant sections of the Management Policies. There is no discussion about why accommodation for overnight stays by the largest recreational vehicles in existence is required in a national park setting? the threshold question posed by the Management Policies. Why does Yellowstone view clearing and repaving the Fishing Bridge RV Campground for very large recreational vehicles as a "form of enjoyment" that is "uniquely suited and appropriate" for Yellowstone National Park? Similarly, why cannot Yellowstone defer to private industry to meet the need for recreational demand, such as it is, for parking very large recreational vehicles? The assessment of environmental consequences to visitor resources (EA Chapter 4.3) touches on the Management Policies, but does not get to the heart of the question about appropriateness of the proposed action. We encourage Yellowstone to revisit the appropriateness of razing and repaving Fishing Bridge RV Campground in light of the Management Policies.

Response: Deferring to private industry to handle the large RVs has been analyzed under the no action alternative. Under the no action alternative the RV Park would not be renovated and the current restrictions on size and substandard conditions would continue. The National Park Service must weigh competing objectives and decide the best course of action. That is the benefit of an Environmental Assessment; it provides the decision maker an opportunity to make a fully informed decision, which includes compliance with management policies. The RV Park improvements were proposed to: allow larger RVs to stay at the campground, bring utilities up to code, increase buffer space between sites, eliminate un-safe back-in sites and replace with drive-through sites, and eliminate the large vegetated islands that encourage grizzly bears to travel through the campground. This project also resulted in the reduction of approximately 33 RV sites.

Resources

Comment: The cabins need to be removed as they are more of an unsightly viewing even if historic.

Response: The five cabins at Fishing Bridge were left in place to represent the historic structures and development once in this location. Originally there were 285 cabins in the Fishing Bridge area. Funding shortages have reduced the amount of maintenance these cabins receive. They are still important cultural resources.

Comment: A road behind the Lake Ranger Station would cut through a small stand of trees and grassland. It is used as a bed ground for a few bison and mule deer.

Response: Although these trees and habitat may be impacted, the impacts from this project would be minimal and other suitable habitat surrounds the Lake Area.

Comment: Air quality may be an issue: Please indicate campfire/fire place use patterns and estimate cords of wood burned by visitors and concessionaires. I only bring this up, knowing that

there are periods of air inversion when smoke and vehicle pollution may be excessive, or even beyond standards in this Class 1 clean air National Park.

Response: None of the actions described in this comprehensive plan would violate any air quality standard or result in a cumulative net increase of any criteria pollutant under federal or state ambient air quality standards. As discussed on page 28 of the EA, implementation of any of the alternatives described in this management plan would have negligible effects on air quality, and the park's Class I air quality would be unaffected.

Comment: do something to enhance the east wing of Lake hotel from the outside

Response: The Lake Hotel is a proposed National Historic Landmark. As such, its historic appearance will be maintained to its period of significance under the Secretary of the Interior Standards for the Treatment of Historic Properties. However, rehabilitation to improve the back entry will occur.

Comment: I feel conversion to "pedestrian only" detracts from the historic use and experience of arriving at the attractive main entrance by vehicle.

Response: Historic use has changed over time. The original mode of arrival to the Lake Hotel was by boat and stage coach. Under the preferred alternative the roadway would be maintained and the Park's historic buses would access the front of the Lake Hotel. Character-defining features of the roadway would be retained. NPS specialists determined there would be no adverse effect on this historic property and the Wyoming SHPO concurred with this determination.

Comment: Is it possible, at this stage of the analysis, for some consideration to be given to modifying pedestrian travel between Lake Lodge and Yellowstone Lake? The assessment mentions the ecological and aesthetic importance of meadows and there are several compacted and eroding foot-paths across the meadow directly in front of the Lodge, from the Lodge area to the Lake. They vary from about 1/8 to 1/4 mi. long and can actually be seen on the assessment aerial photos of the Lake Lodge area. Would like to see most or all obliterated and a plan for foot travel to and along the Lake that protects the meadow and its setting, and the bank of the Lake.

Response: As conditions and priorities allow, these informal trails will be addressed.

Comment: Plus the road won't be stable due to the lake erosion in a couple of decades anyway - that part of the shoreline is receding rapidly.

Response: Erosion in the Lake area is an issue in certain areas and is discussed in section 3.1.1 of the EA. Monitoring will continue to determine if erosion concerns pose a threat.

Comment: The Lake Lodge area has some areas of concern for me....sometimes I think there are too many parking lots going downhill east towards the Lake from the Location Mgr.s house. They just look like paved areas with no cars in them. Why not move some of the cabins down to them and relandscape the area.

Response: This plan zones all of the parking areas next to the Lodge as historic, indicating that cabins could in fact be moved there in the future.

Comment: The wetlands portion omitted some wetlands in the Lake area such as the lower part of the Lake Horse Pasture closest to the Road; The meadows just south of Fishing Bridge Junction on the west side of the Grand Loop Road - witnessed a large amphibian migration out of them and across the Grand Loop Road in the late 80's and early 90's; possibly the outflow of the spring boxes near the Elephant Back Trailhead before it hits the head waters of Lodge Creek or maybe actually creates the headwaters. There are also spring and wetlands areas along the old road bed that leaves Lake and heads south towards Bridge Bay....interesting vegetation is also found there.

Response: Additional wetland surveys will occur in the 2012 field season. Areas where changes were anticipated were surveyed. Due to time and budgetary constraints the entire planning boundary could not be surveyed. The areas identified in your comment are not areas where change is proposed in the plan. We will review these additional areas in the 2012 field season.

Comment: In front of the Lake Lodge above the shore line, create a visitor walkway. With relatively little expense, asphalt paths can be laid down running above the lake to the Lake hotel. People today are now making their own trails to the detriment of the grassy areas. The asphalt paths have been used in other NPS parks and monuments. They keep the visitors on the paths and are a visual reminder where people are suppose to walk. Discrete signs can be posted along the walkway which say, "Please stay on the walkway and help protect our fragile environment." The overwhelming majority of visitors will adhere to this kind of reminder, and they will not hesitate to correct people who want to wander around creating unnecessary footprints. Consider the effectiveness of passive warnings from mobile speed signs. People do slow down without being arrested. The asphalt paths should be wide enough to accommodate two adults walking abreast or a wheel chair moving along. At strategic places, permanent benches can be installed to allow for resting, picture taking, and just plain contemplation of nature's wonders. Another sign reading, "Sorry but no bicycles or jogging." will stop that kind of use. What will this accomplish? A great deal. It is a people control mechanism and an educational tool at the same time. Over the years it can greatly reduce unnecessary human caused erosion, and at the same time remind visitors that they too have a role in protecting Yellowstone. This role cannot be over emphasized.

Response: While visitors may utilize this area informally, the plan intentionally avoids formalizing a trail in this location due to the proximity to grizzly bear habitat. Bears are often hazed into this area and a formalized trail may increase potential conflict. A formalized trail would likely increase use, particularly by bicycles which are often fast and quiet and therefore more dangerous in grizzly bear areas. The plan identifies conversion of the road in front of the Lake Hotel as a pathway. This is intended to reduce the need for formalized pathways across meadows where impacts are greater and where grizzly bears may be present. We will add signing to the Lodge Location.

Comment: Moving cabins a few 100yds - how will Foundation removal affect area?

Response: Removal of the foundations will disturb topsoil around the foundations. Topsoil will be salvaged and replaced after construction in order to allow the area to revegetate.

Comment: The Lodge Creek spotted frog population and the history of research and management efforts should be cited in the EA at an appropriate level of detail.

Response: Chapter 3 of the EA and resource mapping are updated to reflect this information.

Comment: Important habitat areas for the Lodge Creek spotted frog population are not identified in the EA, such as the small wetlands upstream of the Grand Loop road, and most of Lodge Creek and its three headwater springs (not mapped as wetlands). I am thus concerned that future planning, management, and development will not consider these areas. I am enclosing an annotated aerial photo (a similar version was previously submitted to YELL in 2006) that shows important areas, with regards to the last decade. Essential habitat for the frogs includes sites for breeding, foraging, overwintering, and migration routes; and the entire length of Lodge Creek and its associated wetlands. What are the reasonably foreseeable environmental impacts to these areas? Please consider protection of these areas and mitigation for potentially adverse impacts. Also, please recognize that things change in the natural world; planning and management need to be adaptive, including efforts to seek and use current scientific information when potentially intrusive projects or new management activities are proposed.

Response: Thank you, Chapter 3 of the EA and resource mapping has been updated. There are currently no projects (except relocating cabins that are within 100 yards of Lodge Creek) planned along Lodge Creek and its associated wetlands. Because there are no reasonably foreseeable projects in this area the impacts will remain the same as they are today. Because each proposed project is reviewed using resource mapping, any future project would be informed of these concerns.

Comment: The Planning Boundary does not include important areas that may be affected by implementation of the Comprehensive Plan, including lower Lodge Creek and the pond at the mouth of Lodge Creek near Yellowstone Lake, much of the large meadow east of the former Grand Loop road route, and the wetland/pond bordering Yellowstone Lake approximately 0.5 mile north of this area. Including these ecologically (and scenically) important areas within the Plan could assist with preserving amphibian habitat and other natural resources in the Lake area

Response: The planning boundary includes areas where change is likely to occur. Updated amphibian mapping will be included in the comprehensive plan, which will provide guidance for these areas. While this is a comprehensive plan, it is important to realize that this is not a resource management plan. The main focus of this document is guiding development in the future. The planning boundary cannot encompass all watersheds, viewsheds, animal territories, etc.

Comment: Water supply for the planning period seems to me to be of great relevance for the Comprehensive Plan. Are the water sources capable of supplying current and future human needs, particularly in light of climate change predictions and knowledge of the effects of past periods of drought? What upgrades of infrastructure are needed to provide for human use and protect resources (other than the water line replacement in the Fishing Bridge area)? Are current and predicted future flows of Lodge Creek sufficient to maintain aquatic-dependent species such as native fish, amphibians, and the waterfowl that occupy the pond at the mouth of Lodge Creek? What minimum stream flows are needed in Lodge Creek? If or when drought lowers the water

table, can the springs keep up with human demand and minimum stream flows? Is the system capable of supporting additional development in the Lake area, such as additional laundry and showers? Will the Lodge Creek headwater spring water system and delivery system require renovation, and what are the potential impacts of such actions?

Response: Water tanks and waterlines were evaluated within the comprehensive plan. As some of the oldest utilities in the park, there are serious deficiencies including substantial water loss through leakage within the system. Water for the Lake Area developments come from a series of springs and wells. The water line and water tank replacement will reduce the amount of water that is lost, thus accommodating current and future needs. As stated in the EA, the Fishing Bridge water main is 70-80 years old and has a water loss from leakage of 20-35%. The Fishing Bridge water tank loses approximately 12,000 gallons per day due to leakage. Water use in the Lake Area has declined over the years as development has been reduced (e.g., removal of Fishing Bridge Campground, removal of 280 cabins at Fishing Bridge).

Comment: "Is there a potential for restoring wetlands and Lodge Creek through planning for a modernized or improved water supply system? Please consider."

Response: The proposed modernization of the water lines and water tanks in this area may reduce the need to use as much water from sources such as the Lake spring box. This could have a potential benefit to the Lodge Creek drainage and wetlands. Wetland restoration has not been specifically addressed but may also be a potential benefit.

Comment: Could roads and culverts be improved to facilitate animal movements, hydrological conditions, and water quality of Lodge Creek and other streams in the planning area?

Response: Each time a road is reconstructed all culverts are reviewed to address hydrological and animal movement concerns. When the Fishing Bridge section of road is reconstructed, these concerns will be addressed. No road or culvert improvements are currently planned for the Lodge Creek area. In the future when road repairs are necessary, improvements could be made to facilitate animal movements, hydrological conditions, and water quality.

Comment: During my years of working in the Lake area, I have observed apparent decline or disappearance of moose, great gray owls, water voles, and porcupines. The blue camas stand in the Lake horse pasture may deserve recognition and protection. Thinned forests (to reduce fire hazards) may have reduced capacity to support a variety of species. These are anecdotal or impressionistic observations, but the potential loss of biological diversity (especially species lacking' special status') in and around developed areas in YELL is of concern to me, given my experience of documenting the decline of the Lodge Creek frog population. I think the issue of diminished biodiversity warrants evaluation and consideration in the EA. Furthermore, I would encourage the Park to examine the cumulative effects of all the developed areas in the interior of Yellowstone, given the growth that has occurred over the past decades.

Response: While the decline in the Lodge Creek frog population is of concern, the proposed actions in the plan may benefit the levels of water in the area through a decreased need for consumption. The upgrades to water lines and water tanks will eliminate leakage in these areas. The plan addresses cumulative impacts within the planning boundary and those impacts which

affect the planning boundary. Analyzing the cumulative effects of all of the developed areas within the park is outside of the scope of this document.

Comment: Whitebark pine trees are protected by the EA only for trees that are mature and cone-bearing. Given the many years needed to reach maturity and the current die-offs of older trees due to pine bark beetles, isn't it advisable to also protect young whitebark pine?

Response: Whitebark pines will be protected to the maximum extent; however, some trees may be removed during water line replacement and the widening of the road at Fishing Bridge. Mature, cone bearing whitebark pines are the most important component for whitebark pine propagation and recruitment and will be protected from disturbance activities. Young, seedling to sapling whitebark pine trees are ubiquitous in the understory throughout conifer forests in Yellowstone. Young trees are important to whitebark pine recruitment and future cone bearing age classes. When possible, whitebark pine trees of all age classes will be identified and protected from disturbance activities. However, because of the general abundance of young whitebark pine trees in the conifer understory, some loss of young seedling to sapling whitebark pine trees may be expected. This would result in a negligible, adverse whitebark pine population level affect.

Comment: The table of human-caused grizzly bear mortality on page 112 of the EA shows no bears killed in the Bridge Bay/ Lake/ Fishing Bridge area in 2011. However, the USGS report 2011 Known and Probable Grizzly Bear Mortalities in the Greater Yellowstone Ecosystem (http://nrl11sc.usgs.gov/science/igbst/2011l11ort) states that a subadult male grizzly bear was killed on 1 Aug 2011 at Bridge Crk, YNP "Known, human-caused, management removal for numerous nuisance activities and food rewards associated with a campground escalating to aggressive behavior towards humans to obtain food." It might benefit the Plan to describe this event (as was done for the habituated wolf that was killed) and determine what additional measures might be needed at Bridge Bay campground, if any, to prevent re-occurrence, based on knowledge gained from this event.

Response: The bear mortality occurred next to the transfer station at Lake and was the result of a human encounter at Storm Point. Yellowstone National Park has instituted numerous management policies and visitor requirements to mitigate the potential for grizzly-human interactions. These management policies and requirements are listed in section 3.1.6 of the EA. YNP bear management personnel have not identified additional measures for the Bridge Bay Campground.

Comment: Will visitors be encouraged to use the old Grand Loop road route between Fishing Bridge and the Lake Lodge area? Bison encounters in this area sometimes occur (I have observed some hairraising close calls), and visitors may have a false sense of security because the lodge is nearby and many people have the idea that bison are habituated and accepting of close approach. Other sensitive species occur in the area, such as sandhill cranes and elk cow/calves. Would it be possible to restore the old roadway to natural conditions and thus lessen human use? Thank you for not developing this route as a bike pathway, which would be risky and inappropriate for the setting.

Response: The plan included evaluation of this old road trace and concerns that you have expressed were noted, particularly in reference to wildlife and bicycle use. In light of this evaluation, the old road trace will not be converted to bicycle use.

Comment: Dorms or other living spaces need to be hidden back to maintain a more natural look.

Response: Design standards for administrative zones provide guidance on how to minimize the intrusion of employee housing to the public view.

Comment: Throughout the document the words 'rehabilitate' and 'renovate' seem to be used interchangeably. Whereas a rehabilitation project follows the Secretary of Interior's Standards, a renovation project does not. The use of these terms should be consistent to clarify the intent of some individual projects identified in the plan.

Response: The term 'renovate' has been changed to 'rehabilitate' throughout the document to clarify intent.

Comment: The summary of design standards on page 38 states, in part, that alterations and additions would maintain character defining features as identified in National Register, Historic Landmark, and Determination of Eligibility documentation. It should be noted that not all character defining features of a building are necessarily identified in those documents, particularly in a historic district. Additionally, through the passage of time, buildings and features that are not currently considered historic may gain significance.

Response: We have modified the text to reflect this comment. Because consultation will continue with the Wyoming State Historic Preservation Office for projects as they are further developed, there will be sufficient attention to these issues.

Comment: The text on pages 120-21 states that historic significance of the Grand Loop and East Entrance roads. However it is not clear on the assorted maps if these roads are considered historic zones. The plan should clarify the boundaries and guidelines for these historic roads.

Response: Zone maps are updated to reflect the inclusion of the Grand Loop and East Entrance roads as components of the historic zones.

Comment: We also have some comments regarding some of the individual projects that are proposed in the document. While we agree with the overall concept of changing the use of the road in front of the Lake Hotel to be more pedestrian friendly, changing the road material to a different surface could result in an adverse effect.

The proposed project to widen the road in the Fishing Bridge area could also result in an adverse effect. This project will have to be evaluated for its effect to the historic East Entrance Road as it runs through the Fishing Bridge area, as well as the effect to the setting of the Fishing Bridge Historic District.

Response: Consultation with the Wyoming State Historic Preservation Office will continue as projects such as the roadway conversion in front of the Lake Hotel and the widening of the roadway in the Fishing Bridge area evolve. Changes to the road material in front of the Lake Hotel

will preserve character-defining features of the road and will follow the Guidelines for the Treatment of Cultural Landscapes of the Secretary of the Interior Standards in consultation with WYSHPO.

The EA has been updated to reflect the potential for an adverse effect along the road in the Fishing Bridge location, which would be avoided through appropriate designs and on-going consultation with WYSHPO.

Visitor Use

Comment: the alternative that is ultimately selected should consider whether the existing disc golf course at Lake Hotel can be developed and improved

Response: The existing disc golf course was not evaluated in this EA; therefore it will not be developed or improved as a project. Disc golf courses do not align with the desired future conditions for natural, cultural, and scenic resources and visitor experience in the Lake Area.

Comment: "Why remove the traffic pattern in front of the Yellowstone Hotel to the General Store? This should remain open to rubber tire traffic for those that cannot walk(seniors, handicapped etc)

There is plenty of room to improve or develop a walking trail near the current road between Lake Hotel and Lake Ranger Station."

Response: The traffic pattern is being changed to enhance the visitor experience in this area and to reduce the pedestrian-vehicle conflicts. An accessible pathway will be established between the Lake Hotel and the General Store. Historic buses will still provide wheeled access to the front of the hotel. The shoreline is eroding, which is another reason the pathway is proposed within the existing road corridor.

Comment: "if the parking lot currently in existance was turned over for use as a picnic area, there would be prime lake shore access as well as shade and privacy from the hotel traffic.
a parking area of 4-5 spaces would be adequate to provide parking for the clinic. this lot could be located just to the side (either side would work) of the clinic providing closer and safer patient access. this change in traffic flow could improve the visitor experience at lake as well as improve the access and comfort of the clinic patients."

Response: The parking area along the lake shore in front of the current Clinic is maintained by the NPS and is available for prime lake shore access, including the picnic area across the street. This parking area is not assigned to the Clinic. The parking area behind the Clinic is also maintained by the NPS and is not assigned to the Clinic. However, in the future 4-5 visitor parking spaces could be designated close to the Clinic rear entrance.

Comment: I believe the only way to improve the Fishing Bridge RV Park would be to remove at least 1/3 of the sites. At present it is an overcrowded disaster.

Comment: The Fishing Bridge RV Park is a disaster. The biggest improvement would be to remove about 1/3 of the sites, giving visitors a little room for comfort. The overcrowded conditions now are unbelievable.

Response: Removal of 119 sites would not meet the objectives of this plan to provide necessary and appropriate visitor facilities. The current proposal removes approximately 33 sites in the RV park. The proposed action does increase the area for each site. The approximate existing density of the northern loop of the RV Park is one site per 2,100 ft^2. The density for the proposed action will be one site per 4,200 ft^2.

Comment: Turning the Lake Service Station into a coffee shop or limited food service (page 265) is only going to create additional congestion in the area.

Response: The plan recommends adaptive use for a visitor function for this historic structure but does not indicate specific services. Congestion and parking have been evaluated for a visitor use function in this location.

Comment: However, I hope you do not restrict professional access to the porte cochere at Lake Hotel. For those with a limited time to enjoy the area, being driven up to the porch is a grand experience I would hate to see lost. In that there is no room for a pathway and a two lane road south of the hotel, why not a one way road?

Response: The preferred alternative proposes that historic Yellowstone buses would still be allowed to the front of the hotel. A one-way road has been analyzed as part of Alternative C, but was not selected because it did not provide the safest pedestrian experience.

Comment: Or, costing more, a safe, accessible path/stairs down to the lakeside for only that stretch and for when conditions permit would no restrict public motor access to the front of the hotel and the lakeshore.

Response: The preferred alternative does restrict public motor access to the front of the Lake Hotel and portions of the lakeshore. An accessible pathway is also proposed for the area between the Lake Hotel and the General Store.

Comment: Bridge Bay Campground and Marina - showers This need can be shared at one common site.

Response: The showers were proposed in two different locations because they serve two different sets of visitors and eliminate the need for visitors to drive back and forth thus increasing traffic between the campground and marina. The one proposed at the marina would serve boaters, while the two in the campground would serve campers. There are currently no showers in either location.

Comment: The paving of approximately seven acres of area to accommodate motor homes. This smacks of catering or perhaps even pandering to the super affluent, and the planners should avoid giving into the political pressures brought on them by this "leave nothing behind but the swimming

pool," traveling set. There is a way to avoid confrontation over this matter because there is a win-win scenario, and it is simply this. Pave the seven acre parcel. Pave even more of that relatively flat land which is out of the grizzly bear corridor. But do not run water, sewage, or power lines for individual hookups. Instead, develop a comprehensive facility in one location on site not only for them but for tour buses which will be coming more and more each year. The current Greyhound type coaches pulling the latest SUV s, are essentially self-contained. They have generators and storage batteries, holding tanks, and water tanks. They are mobile and can visit the dump and water facility with little effort. They don't need shade trees because they have awnings and air conditioners. Over the next 50 to 100 years, Yellowstone will be visited by more and more touring passenger buses. Plan for this now. Fishing Bridge as mentioned before is in the epicenter of Yellowstone. Tour buses from the five (5) entrances have left civilization behind at the borders, but upon arriving at either Lake or Fishing Bridge, the human needs will become manifest. This could logically become a staging area to accommodate future needs, not just current needs. Motor home travelers can adjust to the reality that wilderness is just that, and they cannot expect at public expense their whims will be satisfied. The author of these words recalls back in the late forties, when tent camping was the norm at Fishing Bridge. People then got along just fine without the refinements of modem civilization.

Response: This plan addressed the purpose and need of the planning proposals, including those facilities deemed necessary and appropriate. At this time, the Fishing Bridge RV Park and proposed upgrades are necessary and appropriate to provide health, life, safety upgrades to a facility that is nearly 50 years old. If, in the future, accommodation for large buses is deemed necessary and appropriate, we may seek to convert this area to that function.

Appendix A – Non-Impairment Finding

National Park Service's *Management Policies, 2006* require analysis of potential effects to determine whether or not actions will impair park resources. The fundamental purpose of the national park system, established by the Organic Act and reaffirmed by the General Authorities Act, as amended, begins with a mandate to conserve park resources and values. National Park Service managers must always seek ways to avoid, or to minimize to the greatest degree practicable, adversely impacting park resources and values.

However, the laws do give the National Park Service the management discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, as long as the impact does not constitute impairment of the affected resources and values. Although Congress has given the National Park Service the management discretion to allow certain impacts within park, that discretion is limited by the statutory requirement that the National Park Service must leave park resources and values unimpaired, unless a particular law directly and specifically provides otherwise. The prohibited impairment is an impact that, in the professional judgment of the responsible National Park Service manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values. An impact to any park resource or value may, but does not necessarily, constitute an impairment. An impact would be more likely to constitute an impairment to the extent that it affects a resource or value whose conservation is:

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;
- key to the natural or cultural integrity of the park; or
- identified as a goal in the park's general management plan or other relevant NPS planning documents.

An impact would be less likely to constitute an impairment if it is an unavoidable result of an action necessary to pursue or restore the integrity of park resources or values and it cannot be further mitigated.

The park resources and values that are subject to the no-impairment standard include:

- the park's scenery, natural and historic objects, and wildlife, and the processes and conditions that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structures, and objects; museum collections; and native plants and animals;
- appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;
- the park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and
- any additional attributes encompassed by the specific values and purposes for which the park was established.

Impairment may result from National Park Service activities in managing the park, visitor activities, or activities undertaken by concessioners, contractors, and others operating in the park. The NPS's threshold for considering whether there could be an impairment is based on whether an action will have significant effects.

Impairment findings are not necessary for visitor use and experience, socioeconomics, public health and safety, environmental justice, land use, and park operations, because impairment findings relates back to park resources and values, and these impact areas are not generally considered park resources or values according to the Organic Act, and cannot be impaired in the same way that an action can impair park resources and values. After dismissing the above topics, topics remaining to be evaluated for impairment include geology and soils, wetlands, vegetation and rare plants, water resources/water quality, wildlife, special status species, climate change, archeological resources, ethnographic resources, historic structures, cultural landscapes, scenic resources, and natural soundscapes.

Fundamental resources and values for the Lake Area are identified in this Comprehensive Plan. The fundamental resources and values include all of the impact topics listed above. All of the impact topics listed above involve the fundamental resources and values of the Lake Area.

Geology and Soils

The proposed action would result in both adverse and beneficial minor land disturbances that would alter topography, geology, and soils within the project area. A majority of the disturbance would be within previously disturbed areas. Areas of erosion, soil loss, and soil compaction would be vegetated and closed to human traffic. To minimize effects to this resource, mitigation measures would be implemented such as topsoil replacement, native vegetation replacement, and noxious weed treatments. Because of the minor impacts associated with the proposed action, impairment to geology and soils would not occur.

Wetlands

The proposed actions under the Preferred Alternative have been designed to avoid and minimize potential impacts to wetlands. The replacement and/or repair of utility lines and installation of electrical lines in the Bridge Bay Campground are the only projects that have been identified with the potential to adversely impact wetlands. As described in section 3.1.2 and figure 3-1 of the EA, wetlands occur throughout the Lake survey area. Installation, repair, and/or replacement of these lines would qualify for U.S. Army Corps of Engineers nationwide permit #12, which allows for "Activities required for the construction, maintenance, repair, and removal of utility lines and associated facilities in waters of the United States, provided the activity does not result in the loss of greater than 1/2 acre of waters of the United States." Nationwide permits are a type of general permit designed to authorize certain activities that have minimal adverse effects on the aquatic environment. Installation of the electrical lines is not expected to impact more than 1/10 of an acre. Replacement of the water main in the Fishing Bridge area will not impact wetlands but future repair of other water and sewer lines has the potential to impact wetlands. If the impacts are above 1/10 of an acre a pre-construction notification will be submitted. Although the planning area has been delineated, if it is discovered that a project would impact wetlands above what is allowable with a nationwide permit, the appropriate section 404 general permit would be sought and the appropriate mitigation completed. Visitors traveling off formal trails would still impact wetland vegetation and compact wetland soils. These potential impacts would be minor, adverse, both short- and long-term. Because these impacts would only result in minor adverse impacts, there would be no impairment to wetland resources.

Vegetation and Rare Plants

Implementation of the Preferred Alternative would result in the removal of trees, most of these in association with water main replacement and RV park improvements. Construction of the new water main in the Fishing Bridge area would require removal of trees in limited areas, such as the route from the Grand Loop Road water main to the Fishing Bridge Museum. Improvements to the north loop of the RV park would remove the vegetated islands within the north loop of the RV park. The removal would consist of approximately 7 acres of vegetation, the majority being lodgepole pine, shrubs, and sedges. Construction of additional parking by the general store and ranger station would remove less than one acre of trees. Projects in the administrative location may impacts individual trees and shrubs, but impacts are expected to be minimal. With the exception of the RV park, any construction would protect trees within the construction zone to the maximum extent practicable. These would be considered local, minor, adverse effects on vegetation. However, under the Preferred Alternative many of the facilities and land uses that are currently resulting in minor adverse impacts on vegetation would be addressed. Relocating facilities and improving trail connections would reduce the incidence of "social trails" that have adverse impacts on vegetation. Topsoil would be salvaged during construction for later revegetation work. No imported topsoil would be used in reclamation. Borrow and aggregate materials from sources outside the park would be heated (or the source certified weed-free), and construction equipment would be carefully checked to avoid the importation of exotic vegetation. After construction activities are completed, revegetation with native plant materials would return disturbed areas to a more natural state. Reclamation and revegetation efforts would follow Yellowstone's policy on vegetation management for construction, which also includes procedures for long-term management of non-native vegetation. Plant species used during reclamation would reflect the vegetation native and typical to the area. Because the project area would be revegetated, the effects on vegetation would be localized and direct, short-term, and minor. The potential for proliferation of non-native plants is possible with any ground disturbance, and the potential for spreading non-native plant species during construction operations is a concern. Contractors would be required to adhere to proper construction techniques and precautions, including washing of equipment before entering the park in order to eliminate any non-native plant seeds. Overall, implementation of Alternative B would result in minor, short-term adverse and beneficial effect on vegetation. Because the proposed action would result in minor, adverse and beneficial impacts to vegetation and rare plants, no impairment would occur.

Water Resources/Water Quality

Under the preferred alternative some of the existing erosion areas and conditions leading to degradation of water quality would be corrected. Trails would be improved to confine pedestrians and reduce "social trails", thereby reducing sediment runoff. With the exception of bulkhead improvements, overlook improvements, and dredging at the mouth of the marina, the proposed projects are located away from the edges of water bodies. Repairing the bulkhead in the marina and dredging would result in temporary impacts to water quality from sediment. The amount of material proposed for dredging is approximately 2,400 cubic yards, and is located at the mouth of the marina. Dredging would be done mechanically and the spoils disposed of in an approved location. Replacement of the water main at Fishing Bridge and the water tank in the administrative location would have a beneficial effect on water resources due to the reduction in loss from leakage.

The proposed construction activities in the Lake Area would result in the potential for a temporary increase in stormwater runoff, erosion, and sedimentation. To minimize these potential temporary increases, a Construction General Permit (CGP) would be obtained and followed and a Stormwater Pollution Prevention Plan (SWPPP) would be prepared and implemented. The SWPPP would identify

construction-specific BMPs that would be implemented as part of the action. The proposed construction activities would include surface water protection measures that would also serve to protect groundwater quality. By adhering to the provisions of the CGP and implementing BMPs associated with addressing site- and activity-specific water resource protection needs, there would be a reduction in stormwater pollutant loading potential and thus a reduction in pollution loading potential to the underlying groundwater subbasins.

The increase in impervious area in the Lake Area would result in an associated relatively minor increase in stormwater discharge intensities and volume. Existing stormwater infrastructure or stormwater infrastructure improvements included as part of the proposed action would incorporate Low Impact Development (LID) measures and Best Management Practices (BMPs) to ensure stormwater retention would be consistent with local and federal requirements and thus minimize potential impacts to surface water quality.

The proposed action would be conducted in accordance with all applicable orders, laws, and regulations. In addition, the Oil Pollution Act (OPA) mandates the implementation of the Spill Prevention, Control, and Countermeasure (SPCC) Plan that is used to prevent and control potential leaks and spills. Implementation of the required plans and permits with their associated protective measures would minimize potential impacts of runoff, spills and leaks. The combination of LID technologies and compliance with federal and State regulations would ensure that no significant impacts to receiving water bodies would result from the preferred alternative. Therefore, implementation of the proposed action would result in minor, short- and long-term adverse effects to water resources/water quality and would not result in impairment of the resource.

Wildlife

The long standing development of the Lake Area has resulted in localized, minor degradation of wildlife habitat but a diversity of wildlife species still inhabit the area. Wildlife present within the immediate vicinity of most of the proposed activities are habituated to human activity and adverse effects on these animals as a result of the activities proposed under the preferred alternative are generally expected to be negligible. The species that use this area could be temporarily displaced by construction activity and equipment, but they would be expected to return following completion of the project. Construction activities along the road corridor (e.g., road widening, entry kiosk) would temporarily displace various bird species. Where previously undisturbed ground was developed, a permanent loss of habitat would occur. Some nesting birds could be displaced by tree cutting activities that occur prior to May-July, (the typical nesting period). The water main replacement and road widening at Fishing Bridge could be expected to have a local, short-term effect on migratory birds, small mammals, and ungulates. Since additional visitor lodging is not proposed under this alternative, wildlife mortalities should remain at current levels. The potential impacts from construction activities are expected to be short-term (temporary) and confined to the immediate project areas. As with all Yellowstone construction projects, the NPS would direct contractors to manage food and garbage so that they are not available to grizzly or black bears. Contractor staff would have to attend bear/food management orientation sessions and abide by the normal bear management guidelines. Wildlife habitat, mainly bird and small mammal, would be removed with the RV park renovations and the Fishing Bridge road widening and would result in a long-term adverse impact. Under the preferred alternative, minor, short-and long-term adverse impacts to park wildlife would be expected to occur. These impacts would not result in impairment to the resource.

Special Status Species

Eleven special-status species were determined to have potential to occur within the Lake Area, nine animals and two plant species. Whitebark pine and Yellowstone sand verbena are known to occur in the Lake Area, although Yellowstone sand verbena has been extirpated in the survey area. Special status plant species found in a project area would be relocated or avoided to the maximum extent practicable. With the exception of grizzly bears, gray wolves, and bison, special-status wildlife species are generally not expected to occur within developed areas of the Lake Area due to the habitat disturbance and human use. Bison may be temporarily displaced during construction activities, but will return once equipment use, noise, etc. subside.

The trumpeter swan, bald eagle, peregrine falcon, and boreal toad are not known to regularly inhabit the project area. Any effects to these species would be negligible and short-term.

Selection of this alternative would have negligible to minor effects on the Canada lynx, gray wolf, and whitebark pine and a moderate effect on grizzly bears. The effects on these federally listed species are evaluated below.

Canada Lynx: The Lake Area does not occur in a Lynx Analysis Unit and few, if any, lynx occur in the area. Lynx prefer upper elevation coniferous forests in cool, moist vegetation types, particularly those that support snowshoe hares. The best evidence of lynx presence is along the east shore of Yellowstone Lake, but no evidence exists within the boundary of the Lake planning area. Since all of the projects are in high human use areas, movements of lynx near the project site are not anticipated. While there is always the potential that there could be some direct or indirect impacts to lynx, these impacts are expected to be short-term and negligible. Alternative B would have no effect on the Canada lynx.

Gray Wolves: Impacts could result from the direct and indirect effects of construction and visitor use of the area. While the Lake development is within the territory of the Mollie's pack, no significant impacts are expected. The Mollie's pack regularly uses the area within and surrounding the lake planning area for travel and foraging. Wolves would continue to be hazed out of the developed areas and habituated wolves may be removed. The selected action, as well as the two other alternatives, would result in a "may affect, likely to adversely affect" determination for the gray wolf.

Grizzly Bear: Grizzlies are often observed in the lake area and live and forage in the lake survey area. The developed areas are designated Management Situation 3 habitat, which are managed for regular human use or occupation. No increase in human visitation or occupation of the area is expected because of the proposed projects. Consolidation of the Lake Lodge cabins away from Lodge Creek would reduce potential conflicts with bears. Existing management wildlife closures would be maintained for the area. All contractor employees would be required to attend and abide by the park's grizzly bear orientation sessions. These sessions focus on proper food and garbage storage, how to avoid disturbing or encountering bears, and how to minimize unavoidable effects or encounters. Food storage and disposal procedures at the construction sites and the contractor housing camp would be strictly enforced to minimize the potential for bears to obtain food. By confining construction to within the Lake developed area, there would be no loss of grizzly bear habitat. By providing *Living in Bear Country* orientation sessions for construction workers and strictly enforcing management regulations, the potential direct and indirect effects on grizzly bears and would be minimized and minor. During construction activities there would be short-term displacement of bears adjacent to the developed areas. The park-wide trend of increased visitation would continue to have a negative effect on grizzly bears and could lead to increased bear-human

conflicts. Since 1980 there has been six human-caused grizzly bear mortalities in the Fishing Bridge, Lake developed area, and Bridge Bay area. Hazing of bears out of the developed areas would continue. The selected action, as well as the two other alternatives, would result in a "may affect, likely to adversely affect" determination for the grizzly bear.

Whitebark Pine: Whitebark pine exists both as an overstory and understory component within the survey area. Mature, seed producing whitebark pine occurs as a minor component of the overstory and is common along the Yellowstone Lake shore habitats, especially at Fishing Bridge from the Fishing Bridge Visitor Center to the mouth of Pelican Creek up to 500 meters inland. Prior to construction, surveys would be completed for whitebark pine and mature, cone-bearing trees would be flagged for avoidance during construction. Since whitebark pine is generally found along the lakeshore, it is subject to minor, adverse effects resulting from human-caused erosion and trampling. Mitigation measures would be taken to transplant specimens or to protect plants from trampling through the installation of vegetation barriers. Replacement of the water lines in the Fishing Bridge location may result in the removal of non-mature, understory whitebark pine. The proposed action would result in a "may affect, not likely to adversely affect" for the whitebark pine.

The preferred alternative would not result in impairment to special status species.

Climate Change

The proposed action is not expected to result in more than a negligible increase in GHG emissions. There would be some increase in GHG emission associated with construction, but is not expected to result in more than a negligible increase in the current amount of greenhouse gas emissions in the park or the region. The NPS is committed to incorporating energy efficiency and reduction in greenhouse gas emissions for park operations. Management actions in the LACP/EA alternatives would comply with NPS sustainable energy design and energy management requirements. Any facility development, whether it is a new building, a renovation, or an adaptive reuse of an existing facility, must include improvements in energy efficiency and reduction in greenhouse gas emissions. All projects that include visitor services facilities must incorporate Leadership in Energy and Environmental Design (LEED) standards and strive to achieve the highest LEED certification possible. The preferred alternative would not result in impairment to this resource.

Archeological Resources

Under the preferred alternative the potential exists for construction and/or maintenance activities to impact archeological resources. The project area has been surveyed and known sites recorded. Projects that have the potential to impact surface and subsurface archeological resources include those that involved ground disturbance and excavation, including building removal and relocation, building expansion, pathways, utilities, etc. At such time over the next twenty years that these projects are under implementation, the park would enter into consultation to strive to reach a determination of no adverse effect in order to protect these resources, many of which are already disturbed.

Construction activities would not be permitted in locations where archeological resources are known to be present without mitigation measures in place. If such resources are discovered during construction, the work would cease until park staff have consulted with the state historic preservation officer and the Advisory Council on Historic Preservation (§36 CFR 800.13, *Post-review Discoveries*). In the event that human remains are discovered, provisions outlined in the Native American Graves Protection and Repatriation Act (1990) would be followed, including advance planning. The waterline project in the Fishing Bridge area has potential to impact archaeological

resources; however, subsurface inventories have reduced the potential impacts. Consultation with the WYSHPO is ongoing for this project. The preferred alternative would result in negligible to minor adverse impacts to archeological resources but impairment to this resource would not occur.

Ethnographic Resources

The preferred alternative would result in negligible to minor, long-term adverse impacts to ethnographic resources. Native American Tribes have long been associated with YNP and the Greater Yellowstone Area. Native American often passed through the park for hunting and foraging, migration, or for religious or other cultural endeavors. Yellowstone Lake has been documented as important in oral histories from Native Americans. The Tribes have indicated that ethnographic resources occur throughout the Greater Yellowstone Area, including the study area. Ethnographic resource information may be sensitive. For more information on these resources, contact Yellowstone's Branch of Cultural Resources. It is unlikely that significant ethnographic resources will be impacted by this alternative. Resource access that meets law and policy for Yellowstone National Park would not be curtailed under this alternative. Yellowstone National Park generally supports traditional access, through laws and regulations. Under the preferred alternative, impairment to this resource would not occur.

Historic Structures

The planning area contains two historic districts, two road historic districts, a potentially eligible historic district, a National Historic Landmark, and a proposed National Historic Landmark. Relocation of the Lake Lodge cabins would not constitute an adverse effect under §106. The proposed relocation and consolidation of the Lake Lodge cabins to the west is within the district and also within the context of the Lake Lodge. The repurposing of the Fish Hatchery and Lake Service Station may constitute an adverse effect, although appropriate uses and rehabilitation designs with on-going consultation with WYSHPO may follow the Secretary of the Interior Standards to avoid an adverse effect, reducing the impact to a no adverse effect, or minor impact. Similarly, new structures and alterations to existing historic properties, if designed correctly and in on-going communication with the WYSHPO and ACHP, would result in a no adverse effect. Changes to the Grand Loop Road Historic District in front of the potentially NHL eligible Lake Hotel would also require careful coordination with WYSHPO and ACHP. Widening the East Entrance Road Historic District would have the potential to cause an adverse effect. Ongoing consultation with the WYSHPO would occur as designs are developed. The preferred alternative has minor adverse effects to historic structures. Mitigation measures resulting from consultation could include such items as conservation measures to stabilize the site, structure, or building; Historic American Building Survey (HABS) level photography and/or as-built construction drawings; large-scale, in-kind replacement of historic fabric or use of simulated materials to replicate historic fabric; reuse of portions of the historic structure or building; and/or design of the new structure or building to preserve elements of form and function of the historic structure or building. The preferred alternative also contains design standards associated with the plan which provide mitigating measures in all locations of the plan. Compliance with §106 of the National Historic Preservation Act will be completed as projects are funded and/or approved. The draft LACP/EA was sent to the WYSHPO, which resulted in a response letter received on March 6, 2012. In their response, the WYSHPO stated that they were pleased with the overall direction of the plan and as specific undertakings were initiated further consultation would be required.

Cultural Landscapes

Alignment of the proposed waterline replacement has the potential to adversely affect walkways, stone walls, terraces, and other potentially eligible cultural landscape features and patterns. However, damage to historic fabric as a result of trenching for underground utilities may be

mitigated through adjustments in trench alignments and excavating underneath features in a manner that would not damage them. The relocation of historic structures, rehabilitation and repurposing of historic properties, has the potential to adversely affect the cultural landscape (see paragraph above); however this may be avoided through designs that follow the Secretary of the Interior Standards Guidelines for Cultural Landscapes and on-going consultation with WYSHPO. Compliance with §106 of the National Historic Preservation Act will be completed as projects are funded and/or approved. With the continuation of ongoing consultation with the WYSHPO as specified in the above correspondence, impairment to this resource would not occur.

Scenic Resources

Construction of the proposed projects would create a temporary adverse impact to scenic resources. The short-term visual effects would include disturbed land, construction equipment, and development activities. Construction would cause visual disruptions around the project sites but would not impact critical view sheds. In the long-term, site restoration behind the Fishing Bridge General Store and remediation of social trails that trample vegetative screens would have a minor, beneficial effect on scenic resources. The views associated with historic structures are analyzed in *Cultural Landscapes*, section 4.2.4 of the EA. Some projects would improve the natural scenery by blending existing facilities into the landscape. These include rehabilitating the hospital and post office structure to conform to design standards, and using darker colors on the transfer station. The preferred alternative would not cause impairment of this resource.

Natural Soundscapes

Construction activities associated with the preferred alternative include new buildings, laying of concrete, road construction, and grading. The effect of construction noise would depend upon the type of construction activity, the distance between construction activities and the nearest noise sensitive uses, and the existing noise levels at those uses. Construction would occur throughout the Lake Area. During facilities construction, use of heavy equipment commonly occurs sporadically throughout the daytime hours. Generally, heavy equipment would generate the highest noise levels throughout the construction phase, but would be temporary in nature, and would diminish the farther sensitive noise receptors are from the construction site. Although some heavy equipment would be used throughout the construction process, the noisiest heavy equipment would be associated with site preparation up to and including installation of foundations. The types of equipment necessary for site preparation would be graders, pavers, dump trucks, and concrete mixers and their use would tail off as construction of the structures begin. Use of heavy equipment also depends on the construction schedule, and would not be permanent. Impacts from construction would be minor, short-term and adverse.

Noise from park operations is and will continue to be minimal. Due to the developed nature of the project sites any operational noise impacts would be negligible.

The preferred alternative would not cause impairment to this resource.

Conclusion

As guided by this analysis, good science and scholarship, advice from subject matter experts and others who have relevant knowledge and experience, and the results of public involvement activities, it is the Superintendent's professional judgment that there will be no impairment of park resources and values from implementation of the preferred alternative.

Appendix B – Mitigation Measures

The three planning components, (1) buildable planning zones, (2) planning prescriptions, and (3) design standards, are tools that preserve and protect fundamental resources and values and visitor experience while guiding future changes in development. Therefore, these planning components act as mitigation measures to minimize impacts to resources.

Yellowstone National Park has mitigation measures in place that are applied to construction activities. These mitigation measures will be implemented for the selected action:

- Workers and supervisors would be informed about relevant park regulations and the importance of taking appropriate measures to minimize impacts to park resources.
- Workers and supervisors would be informed about special status species. If one of these species is discovered in a project area, contract provisions would require diversion of construction activities from the location until park staff can assess the situation.
- Construction activities would not be permitted in locations where archeological or paleontological resources are known to be present without the presence of an archeological monitor. If such resources are discovered during construction, the work would cease until park staff have consulted with the state historic preservation officer and the Advisory Council on Historic Preservation (§36 CFR 800.13, *Post-review Discoveries*). In the unlikely event that human remains are discovered, provisions outlined in the Native American Graves Protection and Repatriation Act (1990) would be followed.
- Contractors and subcontractors would be informed of the penalties for illegally collecting artifacts or intentionally damaging paleontological materials, archeological sites, or historic properties.
- All wetlands would be avoided to the extent possible.
- Temporary impacts, such as soil and vegetation disturbance and the possibility of soil erosion, associated with construction activities would occur. In an effort to avoid introduction of exotic plant species, no hay bales would be used. Hay often contains seed of undesirable or harmful alien plant species. Therefore, on a case-by-case basis the following materials could be used for any necessary erosion control dams: wood bark mulch, straw, sand bags, coir logs, and silt fences. Wood bark mulch would be used to reduce surface erosion, help retain soil moisture and promote seed generation of native plants. Standard erosion control measures such as silt fences and/or sand bags would be used to minimize any potential soil erosion where appropriate.
- The minimum area needed for an approved construction activity would be delineated by construction tape, snow fencing, or similar material. All protection measures would be clearly stated in the construction specifications and workers would be instructed to avoid conducting activities beyond the identified construction zone.
- Silt fencing fabric would be inspected weekly or after every major storm. Accumulated sediments would be removed when the fabric is estimated to be approximately 50% full. Silt removal would be accomplished in such a way as to avoid introduction of fine particle materials into any wetlands or flowing water bodies.
- Equipment would not be serviced or refueled near streams; storage and refueling or construction parking and staging areas, would be at least 150 feet (46 m) from streams or riparian areas. Fuel would be stored in fuel trucks or aboveground storage tanks, and all fuel storage would be in staging areas.

- Staging and stockpiling areas would be located in previously disturbed sites, away from visitor use areas to the extent possible, and returned to pre-construction conditions following construction.
- If necessary, dust generated by construction activity would be controlled by spraying water from an approved source on the site.
- Contractors would regularly monitor and check construction equipment to identify and repair any petrochemical leaks.
- To reduce noise and emissions, construction equipment would not be permitted to idle for extended periods and construction workers would not be permitted to broadcast portable audio devices through speakers. The use of jake brakes would be minimized when transporting materials in large trucks.
- The timing of construction activities may be altered to minimize impacts on park visitors, wildlife, or fisheries activities.
- All disturbed areas would be restored shortly after construction activities are completed.
- The Park Vegetation Guidelines including topsoil salvaging would be implemented in construction projects.
- A Park Wetland Specialist would be consulted when a project in or near wetlands is considered.
- A Park Resource Operations or Nonnative Plant Specialist would be consulted when a project involves ground disturbance activities.
- Revegetation and recontouring would be designed to minimize visual intrusions while replicating as nearly as possible pre-construction conditions.
- Revegetation efforts would strive to replicate the natural spacing, abundance, and diversity of the native plant community.
- Weed control methods would be implemented to prevent the introduction of non-native species. Material sources (e.g., sand, gravel, rock, mulch, etc.) would come from a park approved weed free material source pit or area.

Measures to reduce impacts to grizzly bears

- Removal of carcasses from roads and roadsides.
- Enforce park regulations on visitors maintaining a minimum distance of 100-yards from bears (or at greater distances if human presence alters natural behaviors).
- Educating park visitors about the causes of bear-human conflicts and how park visitors can modify their behavior to prevent conflicts from occurring. Educational efforts are made both before and after park visitors arrive in the park.
- All garbage cans and dumpsters are constructed of a bear-proof design.
- Food storage devices are provided in all designated backcountry campsites. Backcountry users not staying in designated backcountry campsites are required to store their food and garbage in a bear-proof manner.
- Regulations that require all anthropogenic foods, garbage, and other attractants to be stored in a bear-proof manner are strictly enforced.
- Regulations prohibiting park visitors from feeding bears are strictly enforced. Developed areas and roadside auto campgrounds are frequently patrolled to ensure compliance with food and garbage storage regulations. All anthropogenic bear attractants left unattended in auto campgrounds are confiscated.
- Seasonal closures around high-use bear areas (i.e., spawning streams, Pelican Valley, etc.)
- Close areas to public use if impacts to resources are evident.
- Bear awareness training provided to employees and contractors
- Maintain and enforce current 45-mph (or lower) speed limits.

- Providing shower facilities within the Bridge Bay Campground and Marina so that visitors do not have to drive to facilities in Fishing Bridge in the morning and evening.
- Fencing visitors and tent use away from known bear use corridors.
- Compliance with 36 C.F.R. 2.10 for camping and food storage
- Removal of wildlife carcasses from roads and roadsides to reduce vehicle strike mortality of bears.
- Park staff will continue to enforce regulations and implement existing procedures to make anthropogenic foods unavailable to grizzly bears and black bears within developments, along roads, and in the backcountry to reduce the chances of bears becoming conditioned to human foods and garbage.

Measures to reduce impacts to the gray wolf

- Removal of carcasses from roads and roadsides.
- Enforce park regulations on visitors maintaining a minimum distance of 100-yards from wolves (or at greater distances if human presence alters natural behaviors).
- Park staff will enforce regulations and implement existing procedures to make anthropogenic foods unavailable to gray wolves along roads and in developed areas during and after construction. The park will follow its approved plan for managing habituated and food-conditioned wolves. Contractors will receive an orientation concerning proper vehicle speeds, food storage, and human behavior in the presence of wolves.
- YNP will limit contractor camps to existing facilities
- Control traffic, parking, and speed should visitation affect wolf activity.
- Close areas to public use if impacts to resources are evident.
- Close areas to the public should a wolf den occur in the future.
- YNP will reduce speed limits and post visitor warnings at road crossings near active den sites, and maintain a maximum speed limit of 45 mph on interior park roads.
- If a den site is located within a construction zone, the zone will be closed until June 15th or until the wolf pups are mobile.