

# **Finding of No Significant Impact (FONSI)**

## **Old Faithful Visitor Education Center Environmental Assessment Yellowstone National Park Idaho/Montana/Wyoming**

The National Park Service (NPS) proposes to build a new visitor education center at Old Faithful in Yellowstone National Park to replace the current inadequate visitor center. More than 3 million visitors come to Yellowstone each year, and most (approximately 85 percent) visit the Old Faithful area. The need for information, orientation, and educational services at Old Faithful is significant. Yet those needs are not being met, and the visitor experience is adversely impacted by the current visitor center, which is too small to accommodate the nearly 25,000 daily visitors to the Old Faithful area during the summer and has no space for interpretive exhibits and other critical visitor service functions. Visitors leave the Old Faithful area without a basic understanding of or appreciation for the complexity and interconnected nature of the hydrothermal features they see and the volcanic activity that defines Yellowstone National Park.

The project's objectives are to construct a new visitor education center in order to provide the critical information necessary for park visitors to have safe and enjoyable experiences and to enhance their understanding and appreciation of park resources and values. Additional objectives include consolidating all appropriate services (e.g., cooperating association bookstore, classroom, reference library, backcountry permit office) and visitor center staff offices into one location in order to better serve visitors; to provide a facility that is fully accessible to both visitors and employees and corrects or eliminates existing health and safety issues; and to ensure that the facility is constructed in a manner that fits the environmental conditions and is sustainable and efficient in design. Finally, an important objective is to ensure that the primary visitor center in Yellowstone is designed to be compatible with the signature "parkitecture" architectural style of the Old Faithful Historic District.

### **Preferred Alternative**

The new Old Faithful Visitor Education Center (OFVEC) will be a two-story building that is approximately 33,000 square-feet in size. There will be adequate orientation and interpretive exhibit space, two theaters (one with 200 seats and the other with 100 seats), a classroom, reference library, cooperating association bookstore, backcountry permit office, public restrooms, and visitor center staff offices within the building. The OFVEC will be fully accessible, energy efficient, sustainable in design, and built using "green" construction materials and techniques. The OFVEC will be designed for year-round use; however, the design will allow portions of the building to be closed during winter for energy efficiency purposes.

The OFVEC will be built on the same location as the current visitor center complex (visitor center, restroom building, two satellite theaters, and plaza), which will be removed. The location of the visitor education center is important for two reasons. This location provides visitors with an easily recognizable and accessible facility where they can quickly have their questions answered and also learn more about the park resources they are seeing. And, this location affords the NPS staff the broadest view of Geysers Hill in order to provide for visitor safety and the protection of the hydrothermal resources.

During construction, a temporary visitor center will be located nearby and clearly identified. The siting of the temporary visitor center and bathrooms was determined in June 2005 after several issues were evaluated and discussed among various park staff. The temporary visitor center will be located near the Old Faithful Lodge between the first tier of the boardwalk around the Old Faithful Geyser and the parking

lot. This location was determined to be most suitable because it provides visitors with an easily recognizable and accessible facility and affords the NPS staff the broadest view of Geyser Hill in order to provide for visitor safety and the protection of the hydrothermal resources. This location will result in the cutting of the minimal number of trees, and functional utilities for hookups are all available in this area.

All construction activities, materials, and equipment will be contained within construction zone boundaries delineated by a fence around the site. If necessary, construction materials could be stored within the government administrative area, at other approved nearby sites, or at contractor-provided storage areas outside of the park. The contract employees will be housed in the temporary contractors' camp established for the Old Faithful Inn construction crew in the Old Faithful government administrative area. If housing demands exceed the anticipated needs, auxiliary contractor housing may be located at the existing Grant Village contractor camp.

## **Alternatives Considered**

The alternatives considered included the no-action alternative and the preferred alternative. Other alternatives were considered but dismissed as explained in the environmental assessment (EA).

Under the no-action alternative, the NPS would not construct a new visitor education center. Use of the existing visitor center would continue without significant modifications; no additional structures would be built. Visitors wanting information would continue to be inadequately served. Space for safety, resource protection, and interpretive functions would remain inadequate, as would the space for the cooperating association bookstore. There would continue to be no area for interpretive exhibits in the visitor center that could enhance the visitors' understanding of Yellowstone's unique hydrothermal resources. Resources would be more vulnerable to damage because there would be limited space for presenting information on resource protection; likewise, there would be no additional space for presentation of visitor safety information. Those needing backcountry permits would continue to be sent to another, difficult-to-find location. Staff would continue to cope with the cramped and insufficient office space that does not meet UFAS or ADA requirements. Periodic maintenance of the buildings would occur, but major renovations would be unlikely. The energy inefficiencies and the potential health hazards from exposed asbestos on the building as well as its seismic instability would not be corrected.

## **Environmentally Preferred Alternative**

The preferred alternative is the environmentally preferred alternative because it replaces the existing inadequate, energy inefficient, historically inappropriate visitor facility with a new building in the same location. The new visitor education center will provide improved and appropriate visitor services; incorporate environmental and energy efficient sustainable design, construction, and operational standards; and improve the visual experience and the historic character of the Old Faithful Historic District with an architecturally compatible building.

## **Why the Preferred Alternative will not have a Significant Effect on the Human Environment**

As defined in 40 CFR Section 1508.27, significance is determined by examining both the context and the intensity of the action.

Minor adverse impacts of the preferred alternative include temporary (limited to the duration of construction) increases in dispersed dust and mobile exhaust emissions caused by truck traffic and equipment activity. Although some soils and vegetation would be affected, adhering to proper construction techniques and precautions will mitigate the possible spread of noxious weeds during construction. Appropriate erosion control devices will be used during construction to control runoff.

Some minor, localized, and short-term displacement of wildlife could occur during construction activities, but animals would be expected to return to the general area. Some short-term and minor visitor inconvenience will occur during construction.

Beneficial impacts of the project include removal of fill in an adjacent swale and restoration of the area to a natural grade. Additionally, the hardened surface in the project area will be reduced by approximately half, allowing rain water and snowmelt to seep into the ground more naturally. This will benefit the hydrothermal basin by allowing replenishment of near-subsurface waters. Prior studies of the movement of shallow hydrothermal fluids indicate that it is unlikely there will be any impact to hydrothermal resources as a result of this construction. Working with the building architects and engineers, the design of the foundations was modified to ensure that there will be no unintended heat flow/heat trapping problems. Construction techniques that are compatible with the sensitive hydrothermal systems in the area have also been determined and specified. Monitoring will continue throughout the project, and construction will stop if any impacts are observed in the hydrothermal basin until those changes can be explained. Some visual effects on historic resources will result from implementation of the preferred alternative, but the visual quality of the new facility and its landscaping will be compatible with the historic district and the cultural landscape and, thus, beneficial. Night-time lighting will be minimal and will not impact the visitor experience in the geyser basin. The visitor experience will be improved by the preferred alternative as the NPS will be better able to provide visitors with the critical information necessary for having safe and enjoyable experiences as well as to enhance their understanding and appreciation of park resources and values through exhibits and other interpretive media on the park's hydrothermal features.

Public health and safety are protected and improved by implementation of the preferred alternative. The building will be designed to Seismic Zone 4 standards.

There are no prime or unique farmlands within or surrounding Yellowstone National Park that would be affected by this project. There are no wetlands, wild and scenic rivers, or ecologically critical areas that would be affected by this project.

No highly uncertain or unique or unknown risks will occur through implementation of the preferred alternative.

Implementation of the preferred alternative will not establish a precedent for future actions with significant effects nor does it represent a decision in principle about a future consideration.

As described in the EA, the action is not related to other actions with individually insignificant but cumulatively significant impacts.

Construction of the new OFVEC will necessitate the demolition of the current Old Faithful Visitor Center complex, which, while within the boundary of the Old Faithful Historic District, was constructed during the Mission 66/Parkscape era. The visitor center complex is also next to the Old Faithful Inn, a National Historic Landmark. For these reasons, a determination of eligibility to the National Register was prepared for the visitor center complex. The Wyoming State Historic Preservation Office (SHPO) concurred with the NPS determination that this complex is eligible for listing. However, for various reasons including the fact that the visitor center complex's Mission 66/Parkscape design is not compatible with the Old Faithful Historic District of which it is a part, the Wyoming SHPO and the Advisory Council on Historic Preservation support the demolition of this eligible complex and agreed that the demolition could be mitigated. A Memorandum of Agreement among the three agencies regarding the demolition of the Old Faithful Visitor Center complex and the construction of the proposed OFVEC was signed December 4, 2003 (see attached MOA). Thus, while demolition of the visitor center complex would constitute an "adverse effect," the mitigation measures proposed make this a moderate impact to the park's historic resources.

The MOA stipulates that the visitor center complex will be documented in HABS (Historic American Buildings Survey) format prior to demolition and that the NPS will continue to involve the Wyoming SHPO in the design development of the new OFVEC. In a letter dated March 23, 2005, the Wyoming SHPO provided supportive comments for the project and reiterated the continuing consultation steps remaining, which the NPS is committed to completing. A new set of HABS photos of the current Old Faithful Visitor Center will be completed in September 2005. Consultation on the 10% construction documents occurred (concurrence letter from the Wyoming SHPO received July 1, 2005). As the project continues, consultation will occur at the 50% and 90% construction document stages.

Construction of the new Old Faithful Visitor Education Center will conform to the requirements of the Secretary of the Interior's Standards for the Treatment of Historic Properties. The building will be constructed in a manner that is sensitive to and compatible with the historic and architectural values of the Old Faithful National Historic District and the Old Faithful Inn National Historic Landmark.

In a letter dated July 17, 2001, the Wyoming SHPO concurred with the National Park Service that an archeological survey of the area was not warranted.

In a letter dated March 4, 2005, the U.S. Fish and Wildlife Service concurred with the NPS that the project would have no effect on the bald eagle, Canada lynx, and gray wolf. The agency also concurred with the NPS determination that the project "may affect, but is not likely to adversely affect" the grizzly bear. With this concurrence, informal consultation pursuant to the regulations implementing the Endangered Species Act of 1973 was concluded.

The implementation of the preferred alternative violates no federal, state, or local environmental protection laws.

In addition to reviewing the list of significance criteria, Yellowstone National Park has determined that implementation of the proposal will not constitute an impairment of the park's resources and values. This conclusion is based on a thorough analysis of the environmental impacts described in the *Old Faithful Visitor Education Center EA*, the public comments received, relevant scientific studies, and the professional judgment of the decision maker guided by the direction in NPS Management Policies (December 27, 2000). Although the project has some minor negative impacts, in all cases these impacts are the result of actions taken to preserve and restore other park resources and values. Overall, the plan results in benefits to park resources and values, opportunities for their enjoyment, and it does not result in their impairment.

## **Public Involvement**

The *Old Faithful Visitor Education Center Environmental Assessment* was made available for public review and comment during a 45-day period ending on March 10, 2005. A total of eight responses were received, including two letters from federal and state agencies (U.S. Fish and Wildlife Service and Wyoming State Historic Preservation Office), one letter from an organization (National Parks and Conservation Association), and five letters from individuals. These comments resulted in no changes to the text of the EA, but substantive comments are addressed in an attachment to this FONSI. The FONSI and summary of substantive comments will be sent to all those who responded during the public comment period.

## **Conclusion**

The preferred alternative does not constitute an action that normally requires preparation of an environmental impact statement (EIS). The preferred alternative will not have a significant effect on the human environment. Negative environmental impacts that could occur are minor or moderate in effect. There are no significant impacts 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



## **Summary of Substantive Comments**

### **Old Faithful Visitor Education Center Environmental Assessment**

A total of eight comment letters were received: two from government agencies, one from a non-profit organization, and five from individuals. In summary, four responders were opposed to the project because they believe that development should be located away from the geyser basin, with two preferring the location to be in a gateway community. The National Parks Conservation Association comments also raised this issue. The reasoning for choosing the present location over more distant locations was explained in the EA, and no new information has been presented to change that reasoning. The project was supported by one individual, the National Parks and Conservation Association, and the Wyoming State Historic Preservation Office. The U.S. Fish and Wildlife Service agreed that the project would have no effect or no adverse effect on listed species. Substantive comments are summarized below.

**Comment:** The park did not adequately assess, disclose, and plan for the overall increased operational needs, including the need for additional interpretive and maintenance staff (and corollary housing needs) as well as additional costs to operate the new facility.

**Response:** As stated in the EA, there will be no need for the park to hire additional staff to operate this facility. The Old Faithful Visitor Education Center (OFVEC) is one of the highest visitor service priorities in Yellowstone National Park. There are currently sufficient staff resources within the park. Some staff may be redirected toward the park's highest priorities in the future. There is sufficient housing as well as other infrastructure in Yellowstone to accommodate this new facility. The facility is being sustainably designed in order to achieve the highest energy efficiencies with innovative heating, cooling, and lighting features.

**Comment:** There is a need for an updated overall plan for the Old Faithful area instead of assessing the many developments in the area on a project-by-project basis. How do all of these planning efforts relate to the 1985 development concept plan for Old Faithful?

**Response:** There is an on-going planning effort for the entire Old Faithful developed area; however, this planning will take a number of years to complete. The Old Faithful Foundational Planning Effort focuses on transportation, circulation, and visitor services that complement the visitor center functions. The 1985 Old Faithful Development Concept Plan confirmed the need for a visitor center in the Old Faithful area, and the current foundational planning effort includes the OFVEC in its current proposed location. The OFVEC project was determined a priority for the park as the present facility is significantly inadequate for meeting current visitor needs. Because the OFVEC was sited in the same location as the current visitor center, it was determined that this project would not conflict with the overall foundational planning effort.

**Comment:** Potential increases in visitation and resultant increased impacts on the Old Faithful area and infrastructure resulting from the new OFVEC were not adequately addressed.

**Response:** As stated in the EA, it is not expected that the new facility will increase visitation to the Old Faithful area. Visitation to the park has been fairly stable for the past 15 years, with approximately 85% of park visitors coming to Old Faithful. This new facility will replace an inadequate facility with one that is of sufficient size and scope to provide the critical information necessary for park visitors to have safe, enjoyable, and satisfying experiences and to enhance their understanding and appreciation of park resources and values. All appropriate services (e.g., cooperating association bookstore, classroom, research library, backcountry permit office) and visitor center staff offices will be consolidated into one

location in order to better serve visitors. As stated in the EA, there is sufficient infrastructure (as noted, a new sewage treatment facility was completed for the Old Faithful area in June 2002) to service this new facility. In addition, an improved series of outdoor information and orientation exhibits, including a geyser eruption notification system, will provide more efficient services for visitors without necessitating that they come into the visitor center for the answer to the most frequently requested information (“what time will Old Faithful Geyser erupt”).

**Comment:** The site for the temporary visitor center and bathrooms should be specifically located and their impacts assessed.

**Response:** The siting of the temporary visitor center and bathrooms was determined in June 2005 after several issues were evaluated and discussed among various park staff. The temporary visitor center will be located near the Old Faithful Lodge between the first tier of the boardwalk around the Old Faithful Geyser and the parking lot. This location was determined to be most suitable because it provides visitors with an easily recognizable and accessible facility and affords the NPS staff the broadest view of Geyser Hill in order to provide for visitor safety and the protection of the hydrothermal resources. This location will result in the cutting of the minimal number of trees, and functional utilities for hookups are all available in this area.

**Comment:** More specific details about how all the various concurrent construction projects will be managed, including housing for contractors and storage of materials, should be provided.

**Response:** Construction of the OFVEC is scheduled to begin in spring 2006 and last approximately two years. The Old Faithful Inn rehabilitation project began fall 2004 and is expected to be completed fall 2008. A temporary contractor camp was established for the Old Faithful Inn construction crew in the government administrative area. The OFVEC construction crew will use this contractor camp; at certain times, if housing demands exceed the anticipated needs, auxiliary contractor housing may be located at the existing Grant Village contractor camp. A construction zone will be established around the OFVEC with fencing, and construction materials will be stored within the perimeter of the site. If necessary, construction materials could be stored within the government administrative area, at other approved nearby sites, or at contractor-provided storage areas outside of the park.

**Comment:** More information on the necessity/desirability of co-locating non-interpretive functions (backcountry office and Yellowstone Association bookstore) in the visitor center should be provided.

**Response:** As in other national parks, Yellowstone’s visitor centers provide central locations where visitors can obtain orientation and general park information, receive educational information about resources through interpretive services, and find other types of visitor services such as interpretive and educational sales items to enhance their understanding of the resources they are seeing. Visitors are best served when they are able to obtain all necessary information and park permits (*e.g.*, backcountry, fishing, boating) in one location. To this end, all new visitor centers are designed to accommodate the staffing, offices, and functions necessary to facilitate “one-stop shopping” as approved in the park’s *Long-Range Interpretive Plan* (2000). This includes the backcountry office and the non-profit cooperating association bookstore operated by the Yellowstone Association.

## ERRATA SHEET

The discussion of the impacts of the preferred alternative on Historic Resources (page 57 of the environmental assessment) incorrectly stated that demolition of the current visitor center complex (which is an “adverse effect”) would constitute a major impact. The impact would be “moderate” due to the mitigation measures proposed.

The thresholds of change for the intensity of impact to historic resources define a **Moderate** impact as:

Effects to historic resources would be readily detectable, would have the potential to diminish the significance or integrity of the site, structure, or building, and may jeopardize its National Register eligibility. A “moderate effect” corresponds to either an “adverse effect” or a “no adverse effect” for §106 purposes depending on mitigation measures proposed. 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.



**Memorandum of Agreement  
among the National Park Service,  
the Wyoming State Historic Preservation Office,  
and the Advisory Council on Historic Preservation  
Regarding the  
Demolition of the Old Faithful Visitor Center Complex and  
Construction of the Old Faithful Visitor Education Center  
Yellowstone National Park**

**WHEREAS**, the National Park Service (NPS) has determined that the demolition of the Old Faithful Visitor Center; associated restroom building; two separate, but adjoining, theater buildings; and associated interpretive, structural, and landscape features will have an adverse effect on the Old Faithful Visitor Center Complex, which is eligible for listing in the National Register of Historic Places, as well as on the existing Old Faithful Historic District (which is listed in the National Register of Historic Places) and the Old Faithful Inn (which is a National Historic Landmark), and has consulted with the Wyoming State Historic Preservation Officer (SHPO) pursuant to 36 CFR Part 800, regulations implementing Section 106 of the National Historic Preservation Act (16 U.S.C. Section 470f); and

**WHEREAS**, in accordance with 36 CFR Section 800.6(a)(1), the NPS has notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination, and the ACHP has chosen to participate in the consultation pursuant to 36 CFR Section 800.6(a)(1)(iii);

**NOW, THEREFORE**, the NPS and the Wyoming SHPO agree, with the concurrence of the ACHP, that the construction of the new Old Faithful Visitor Education Center shall be implemented in accordance with the following stipulations in order to take into account the effect of the new development on existing historic properties.

**I. STIPULATIONS**

The National Park Service, in cooperation with the Wyoming SHPO, will ensure that the following stipulations are implemented:

1. The existing Old Faithful Visitor Center complex will be adequately documented in HABS (Historic American Buildings Survey) format before removal from the site. Yellowstone National Park, representing the NPS, will contact the HABS Mitigation expert, National Park Service, Rocky Mountain Regional Support Office, Denver, CO, summarizing the project; the Section 106 requirements; documentation request from the Wyoming SHPO; existing 4"x5" format photographs taken by Jet Lowe, HABS photographer, with attached information on the history of the property (Wyoming Cultural Resource Inventory forms); maps; UTM locations of the district; and a narrative history of the design and development of the Old Faithful Visitor Center.
2. The NPS's responsibilities, under Section 106 of the National Historic Preservation Act of 1966, as amended, will be complete concerning only the demolition of the existing Old Faithful Visitor Center once the Wyoming SHPO receives and accepts the final HABS documentation as satisfactory mitigation. Buildings and infrastructure will not be removed from the site until NPS receives written acceptance of the HABS documentation from the Wyoming SHPO.
3. The NPS will continue to provide the Wyoming SHPO updated design development information in a timely manner on the new Old Faithful Visitor Education Center. The NPS will solicit the Wyoming SHPO's comments on the scoping documents, the environmental assessment, and on the design as it proceeds from design development through the construction documents stages. Reviews will be solicited from the Wyoming SHPO during design development at the 10%, 50%, and 90% completion stages. The construction documents will be provided to the Wyoming SHPO for comment at the 10%, 50%, and 90% stages. The NPS will continue to take into account the Wyoming SHPO's comments throughout the consultation process on this project. The Wyoming SHPO shall have thirty

(30) calendar days to provide written comments at each stage of the design development and construction document phases of the project.

## **II. DURATION**

This agreement will be null and void if its terms are not carried out within five (5) years from the date of its execution. Prior to such time, the NPS may consult with the other signatories to reconsider the terms of the agreement and to amend the document in accordance with Section IV below.

## **III. DISPUTE RESOLUTION**

1. Should the Wyoming SHPO or the Advisory Council object within 30 calendar days to the actions proposed by the NPS pursuant to this MOA, the NPS shall, for a period not exceeding 10 calendar days, consult with the objecting party to resolve the objection. If the NPS determines that the objection cannot be resolved, the NPS shall forward all documentation relevant to the dispute to the Advisory Council. Within 30 calendar days after receipt of all pertinent documentation, the Advisory Council will either:
  - A. Provide the NPS with recommendations, which the NPS will take into account in reaching a final decision regarding the dispute; or
  - B. Notify NPS that it will comment pursuant to 36 CFR 800.6(b) and proceed to comment. Any Advisory Council comment provided in response to such a request will be taken into account by NPS in accordance with 36 CFR 800.6(c)(2) with reference to the subject of the dispute.
2. Any recommendations or comments provided by the Advisory Council will be understood to pertain only to the subject of the dispute; the NPS's responsibility to carry out all actions under this agreement that are not subject to the dispute will remain unchanged.

## **IV. AMENDMENTS AND NONCOMPLIANCE**

If any signatory to this MOA determines that its terms will not or cannot be carried out or believes that an amendment or addendum to its terms must be made, that party shall immediately consult with the other parties to develop an amendment or addendum to this MOA pursuant to 36 CFR 800.6(c)(7) and 800.6(c)(8). The amendment or addendum will be effective on the date a copy signed by all of the original signatories is filed with the Advisory Council. If the signatories cannot agree to appropriate terms to amend the MOA, any signatory may terminate the agreement in accordance with the Section VI, below.

## **V. FAILURE TO CARRY OUT TERMS OF AGREEMENT**

Failure to carry out the terms of this MOA requires that NPS again request the Advisory Council's comments in accordance with 36 CFR 800. If NPS cannot carry out the terms of the MOA, it will not take or sanction any action or make any irreversible commitment that would result in an Adverse Effect to an historic property or that would foreclose on the Advisory Council's consideration of modifications or alternatives to the undertaking until the commenting process has been completed.

## **VI. TERMINATION**

If this MOA is not amended following the consultation set out in Section IV, it may be terminated by any signatory. Within 30 days following termination, the NPS shall notify the signatories if it will initiate consultation to execute another MOA with the signatories under 36 CFR 800.7(c)(1) or request the comments of the Advisory Council under 36 CFR 800.7(a) and proceed accordingly.

Execution of this Memorandum of Agreement by the NPS and Wyoming SHPO and the submission of documentation and filing of this MOA with the Advisory Council pursuant to 36 CFR Section 800.6 (b)(1)(iv) and implementation of its terms evidence that the NPS has taken into account the effects of this undertaking on historic properties and afforded the Advisory Council an opportunity to comment.

*NATIONAL PARK SERVICE*

By: \_\_\_\_\_/s/\_\_\_\_\_ Date: 9/19/03  
Suzanne Lewis, Superintendent, Yellowstone National Park

*WYOMING STATE HISTORIC PRESERVATION OFFICER*

By: \_\_\_\_\_/s/\_\_\_\_\_ Date: 10/3/03  
Judy Wolf, Program Manager, Review and Compliance, Wyoming SHPO

Accepted by  
*ADVISORY COUNCIL ON HISTORIC PRESERVATION*

By: \_\_\_\_\_/s/\_\_\_\_\_ Date: 12/4/03  
John M. Fowler, Executive Director