

## **Finding of No Significant Impact West Entrance Project Yellowstone National Park**

The National Park Service proposes to reconstruct the West Entrance station. The project will include two aspects: 1) a new entrance station, with an associated administration building, both built further into the park to provide longer traffic queuing distance; and 2) an expansion to the West Yellowstone, Montana, Chamber of Commerce contact station.

The project is needed because the existing station has many problems, including structural, geographic, visitor service, and employee health and safety deficiencies. Structural problems include traffic lanes that are too narrow for some modern vehicles, so narrow that large RVs and buses hit or scrape the kiosks themselves 10-12 times daily and/or are forced to go around the entrance. Further, the overhead height of the canopy is too short for the tallest vehicles. To accommodate these wide or tall vehicles, current staff must halt outbound (westbound) traffic and allow the vehicle to enter the park via that lane. Sometimes these large vehicles are surrounded by waiting vehicles, making it necessary for several rangers to free up the necessary space for the vehicle to access the outbound lane. Clearly, safety violations are inherent in this improvised system. These situations further back up entering traffic, delaying and frustrating park visitors and staff alike. A final structural problem is that exhaust fumes from vehicles, especially snowmobiles, collect under the canopy. Carbon monoxide emissions from snowmobiles approach Clean Air Act Class I limits for national parks at times in the West Entrance area.

The entrance also has geographic problems. Its proximity to the nearby town of West Yellowstone means that entering vehicles sometimes back up into the town itself, primarily when an oversize vehicle has been caught in traffic or has struck the entrance. Such backups cause unnecessary congestion both on the approach lanes in the park and in West Yellowstone. Park staff attempted to remedy this problem by converting an unused entrance lane (previously unused because it has no kiosk, but only a 30-inch-wide traffic island for an employee to stand on) to an express lane for vehicles already possessing entrance passes. While this solution has helped, the express lane's approach has inadequate distance for effective signing, and re-entering visitors often lack the necessary space and reaction time to make the lane switches necessary to use it. Therefore, the express lane is often underused.

Serving visitors is difficult with the current entrance. The West Entrance is Yellowstone's busiest, admitting about 40% of Yellowstone's 3 million visitors. Yet, there is no information desk or adequate space at which visitors may obtain needed backcountry or fishing permits. Due to the large crowds and lines of vehicles, rangers can do no more than collect fees from entering visitors and give them printed warnings and park information. Most visitors spend less than 60 seconds with a ranger, which is not enough time for him or her to warn them about the park's many unusual and inherent dangers. Entrance rangers have attempted to deal with this problem by installing a temporary trailer to disseminate backcountry and fishing permits, and by committing to help staff the Public Lands Desk at the West Yellowstone Chamber of Commerce. While these efforts have helped somewhat, they are either just temporary fixes or need additional

space to adequately serve the large number of visitors entering the West Entrance. In summary, the lack of an effective contact station means that the NPS misses important interpretive opportunities for visitors about to drive the West Entrance Road's 14 miles of wildlife-rich habitat and to experience the park's inherent dangers.

The West Entrance presents several health and safety problems for entrance rangers as well. Storage space is unheated, infested with mice, and lacking proper storage methods. Employees staffing the express lane are forced to stand on a narrow traffic island between two lanes of traffic, endangering their safety and health. The kiosks were not ergonomically designed, so employees must perform repetitive tasks in ways that may contribute to injury or unsafe conditions. Employees exiting the small office building step out directly into the express lane. No crosswalk is marked for employees to safely walk to the kiosks. As noted above, oversize vehicles present additional safety problems, as do the fumes that collect under the canopy.

Lastly, the current entrance completely lacks adequate office space for its staff. As the busiest entrance, the West Entrance therefore brings in the most revenue. Entrance rangers have insufficient and insecure space in which to balance their cash drawers at the close of their shift and to file necessary reports, no meeting rooms or private office space, and no break room. More extensive office space is desperately needed.

#### **Preferred Alternative**

Under this alternative, the NPS would construct a new West Entrance about 2,300 feet east of the park boundary (about 800 feet east of the existing entrance). This site is due north of the Yellowstone General Store warehouse area, from which point convenient utility connections would be possible. The added distance to the park boundary would provide an increased queuing distance for entering visitor traffic. The new entrance would feature an approximately 3,200 square foot office building on the south side of the entrance road. The canopy structure sheltering the current entrance would be dismantled and moved to the new site, where it would be reassembled, renovated, and remodeled to improve air flow and noise absorption. Under it the NPS would construct four new kiosks in a more rustic style. Kiosks would be spaced to allow wider vehicles to enter, and each kiosk would have a dedicated traffic lane. One lane and kiosk would be an express lane for reentering visitors and park employees. This new entrance, then, would solve the height, width, air pollution, noise pollution, office, and queuing problems of the current entrance station.

Concurrently, the National Park Service would expand the Chamber of Commerce building in West Yellowstone to better serve visitor needs. The expansion would occur on the south side of the Chamber building and would be about 4,200 square feet in size. The addition would feature an expanded visitor information desk and lobby, a multi-purpose room capable of seating fifty people, additional restrooms, offices for NPS interpretive staff, a backcountry permit room, and storage space for NPS personnel. Because the National Park Service may not expend its line-item funds on lands it does not own or lease, both the Town of West Yellowstone (owner of the expansion land) and the Chamber of Commerce (owner of the building) have entered into a discussion toward executing a long-term lease arrangement that would allow the NPS to expand the building.

### **Alternatives Considered**

The alternatives considered included Alternative 1—the no-action alternative, Alternative 2—the preferred alternative described above, and Alternative 3—rebuilding the entrance on its current site. Other alternatives were considered but dismissed as explained in the EA.

Under the no-action alternative, the National Park Service would continue use of the existing entrance station and continue partial staffing of the Chamber of Commerce; the NPS would not construct a new entrance station and the contact station arrangement would remain as is.

Alternative 3 is the same as Alternative 2, except that the entrance would be rebuilt on its current site. The new administration building would be adjacent, and the NPS would still enlarge the West Yellowstone Chamber of Commerce building. Rebuilding on site would necessitate different staging of construction elements, and certain bypass roads would be unnecessary. A temporary entrance would be necessary while the current one is remodeled and rebuilt.

### **Environmentally Preferred Alternative**

The environmentally preferred alternative is determined by applying the criteria suggested in the National Environmental Policy Act of 1969 (NEPA), which is guided by the Council on Environmental Quality (CEQ). The CEQ provides direction that “[t]he environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in NEPA’s Section 101.” It will:

- fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
- assure for all generations safe, healthful, productive, and esthetically and culturally pleasing surroundings;
- attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
- preserve important historic, cultural and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;
- achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life’s amenities; and
- enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

Alternative 2 best fits the balance that the environmentally preferred alternative requires, because it would solve all the problems at the existing station while improving the visitor’s experience. Selection of Alternative 3 would mean that entering visitors would not have adequate reaction time to change into the appropriate lane. Stacked traffic waiting to enter the park would further exacerbate traffic problems under this alternative. Some visitors would thereby end up waiting unnecessarily in the wrong line, creating unnecessary and additional congestion, noise, and air pollution. Moving the entrance, as proposed under Alternative 2, would solve this problem and therefore provide for a more enjoyable visitor experience. Continuing use of the current entrance station, proposed in the No Action alternative, would not remedy the existing problems. Therefore, Alternative 2 is the environmentally preferred alternative.

## **WHY THE PREFERRED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT**

Examination of the criteria highlighted below (defined in CFR Section 1508.27) demonstrates that Alternative 2 will not have a significant effect on the human environment.

**Impacts that may be both beneficial and adverse:** Alternative 2 would have negligible adverse effects on water resources and water quality, wetlands, rare plants, archaeological resources, cultural landscapes, ethnographic resources, prime and unique farmlands, environmental justice, and Indian trust resources. Minor, short-term, adverse effects would occur to air quality, wildlife, and park soundscapes. Minor, long-term, adverse effects would occur to geology and soils, vegetation, and visual quality, due to ground disturbance associated with entrance construction and increased traffic queue lanes. This alternative is not likely to adversely affect threatened and endangered species or their critical habitats; lynx would be unaffected.

Because the existing West Entrance is eligible for listing to the National Register of Historic Places, implementation of the preferred alternative will adversely affect historic properties. However, mitigation is included, and has been approved by the Montana State Historic Preservation Officer. Preservation of HABS-level photographs and architect drawings, and reuse of the existing canopy, which is the most contributing element of the existing entrance, will mitigate the loss of this historic structure so that it is not a significant impact.

Minor short- and long-term benefits associated with the proposal include improvement of local air quality and reduction of traffic noise due to expedited traffic flow and canopy additions, improvement of canopy appearance with the addition of rustic gables, stimulation of local economy due to construction spending, and improvement of visitor experience due to improved traffic flow.

**Degree of effect on public health and safety:** Public and employee health and safety are protected and improved by implementation of the preferred alternative. Traffic flow will no longer be restricted by entrance lanes that are too narrow and short for some modern vehicles. Air and soundscape quality will be improved through canopy alterations. Working conditions for park employees will significantly improve.

**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:** As described above, mitigation of the adverse effects on a historic structure in Yellowstone is included. Alterations to the Chamber of Commerce building will blend it with the nearby Oregon Shortline District better. As explained in the EA, there are no prime or unique farmlands within or surrounding Yellowstone National Park that would be affected by this project. Nor are there wetlands, wild and scenic rivers, or ecologically critical areas that would be affected by this project.

**Degree to which effects on the quality of the human environment are likely to be highly controversial:** There were no highly controversial effects identified during either preparation of the environmental assessment or the public review period.

**Degree to which the possible effects on the quality of the human environment are highly uncertain, or involve unique or unknown risks:** There were no highly uncertain, unique, or unknown risks identified during preparation of the environmental assessment or the public review period.

**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:** 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.

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

**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:** As explained in the EA, the demolition of the existing entrance will result in adverse effects to a historic property. Mitigation of this effect is included, has been approved by the Montana SHPO, has already begun, and means the adverse effect is not significant.

**Degree to which the action may adversely affect an endangered or threatened species or its critical habitat:** On January 9, 2004, the U.S. Fish and Wildlife Service concurred with the park's "may affect, not likely to adversely affect" determination for bald eagles, gray wolves, or grizzly bears, and with the park's determination that the project will have "no effect" on lynx.

**Whether the action threatens a violation of federal, state, or local environmental protection law:** The implementation of the preferred alternative violates no federal, state, or local environmental protection laws.

**Impairment of park resources:**

In addition to reviewing the list of significance criteria, the NPS has determined that implementation of the proposal will not constitute an impairment to Yellowstone National Park's resources and values. This conclusion is based on a thorough analysis of the environmental impacts described in the West Entrance Project EA, the public comments received, relevant scientific studies, and the professional judgement of the decision-makers guided by the direction in NPS Management Policies (December 27, 2000). As described in the EA, implementation of the preferred alternative will not result in major, adverse impacts to a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of Yellowstone National Park; (2) key to the natural or cultural integrity of the Park or to opportunities for enjoyment of the park; or (3) identified as a goal in the park's general management plan or other relevant National Park Service planning documents.

**Public Involvement**

The West Entrance Project EA was made available for public review and comment during a 30-day period ending on October 7, 2003. A total of 13 written responses were received: two from tribal governments, three from entrance station employees, one from the U.S. Forest Service, and 5

from individuals (with one person writing twice). One telephone comment was received from park staff. Comments were generally supportive of the project. Most commentators supported the preferred alternative. The comments resulted in no changes to the text of the EA, but are addressed in the summary of comments attached to this FONSI. The FONSI and summary of comments will be sent to all those who commented.

**Conclusion**

The preferred alternative does not constitute an action that normally requires preparation of an environmental impact statement (EIS). The preferred alternative will not have a significant effect on the human environment. Negative environmental impacts that could occur are minor or moderate in intensity. 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 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: *Suzanne Lewis* 3/15/03  
Superintendent Date  
Suzanne Lewis

Approved: *Steve Martin* 3/19/04  
Intermountain Regional Director Date  
Steve Martin

**Summary of Comments**  
**West Entrance Project Environmental Assessment**  
**Yellowstone National Park**

Substantive comments to the Environmental Assessment centered on four topics: project financing, historic/archaeological concerns, partner participation, and design considerations. The topics, which are addressed below, resulted in no changes to the text of the environmental assessment.

**Project Financing**

*Comment:* Private financing is available to enlarge the West Yellowstone Chamber of Commerce, with the National Park Service reimbursing the financiers through a lease-to-own arrangement made possible by the General Services Administration. In so doing, the National Park Service could avoid having to await appropriation of government funds, and would be able to spend what funds are available on the West Entrance reconstruction.

*Response:* Funding under the Congressional Line Item Construction Program has been approved by the Department of the Interior, and while a delay in appropriating the funding is possible, it is unlikely to be more than one or two years at most. Appropriated funds are sufficient for both entrance and contact station construction. Furthermore, given the chronic shortfall in NPS funding, a lease arrangement, even if short-term, diverts scarce appropriated Yellowstone funds away from other important park needs, as the lease payment would be made from park operations accounts.

**Historic and Archaeological Concerns**

*Comment:* Reusing the canopy and altering its roofline sacrifices the historic integrity of the West Entrance. Retaining the entrance station in its existing site will preserve more of its history.

*Response:* The canopy is more than 30 years old and in need of repair. Its remodeling, renovation, and reconstruction, even on its existing site, would result in an adverse effect to the historic West Entrance. However, as detailed in the EA, several forms of mitigation for this effect are included in the project: 1) Preservation of HABS-level photographs of the West Entrance in local libraries; 2) Preservation of the pre- and post-construction plans in the same libraries; and 3) Adaptive reuse of the canopy—the most contributing element of the entrance station’s historic eligibility—for the same function and very close to its original location. The Montana State Historic Preservation Officer has approved these forms of mitigation.

*Comment:* One commentor requested that construction activities remain within the predefined boundary of the project, and that construction cease if Native American remains were discovered.

*Response:* As discussed in the EA, construction zones will be kept to the minimum necessary, with the contracts so specifying. If archaeological remains are inadvertently discovered during

construction, work will cease until the park archaeologist can identify and document the resources, and until the Montana SHPO and NPS can develop an appropriate mitigation strategy.

*Comment:* Mitigation should include a list of Mission 66 structures within the park and a historical context for these structures.

*Response:* The NPS already has a list of structures built in the park between 1961 and 1972 (the primary Mission 66 construction period) excluding the Canyon and Grant Village areas (both of which are in Wyoming). Of all the structures, only three are in the Montana portion of Yellowstone—one of which is the West Entrance. With so few of such structures in the Montana portion of Yellowstone, writing the contextual history suggested is outside the scope of this project. However, some idea of the context of Mission 66 structures within Yellowstone can be obtained from the park's existing three-volume historic resource study (*The History of Concessions Development in Yellowstone National Park, 1872-1966*, by Mary Shivers Culpin (National Park Service Yellowstone Center for Resources, Yellowstone National Park, WY, 2003), and *The History of Administration in Yellowstone National Park, 1872-1966, Volume III* (Tentative Title), by Mary Shivers Culpin and revised by Kiki Rydell (currently being revised and edited, not yet published)).

### **Partner Participation**

*Comment:* The NPS should continue partnering with the U.S. Forest Service/Gallatin National Forest and the U.S. Green Building Council in the development of architectural plans for the West Yellowstone Chamber of Commerce Building and the entrance station.

*Response:* The National Park Service fully intends to seek the input and participation of these valuable partners in the design and development of the entrance station and chamber building. It hopes to continue partnering with the U.S. Forest Service/Gallatin National Forest in staffing the information desk at the chamber as well.

### **Design Considerations**

*Comment:* Several commentors felt that the Chamber addition will address questions of some entering visitors, but that inevitably some visitors will either miss the building entirely or will think of new questions upon arriving at the entrance. They requested either that the administration building adjacent to the entrance station include a room from which park staff can answer visitor questions and distribute backcountry and fishing permits or that a separate contact station be constructed east of the new entrance station. The commentors felt that a failure to provide such a room could defeat part of the purpose of the new entrance, namely that of improving the speed and quality of the entrance station visit.

*Response:*

The project does not have sufficient funding to construct a new visitor contact facility within the park. Enlarging the contact station is the most cost-effective attempt to address visitor information needs.



Decisions about individual rooms and their functions within the contact station and administration building are outside the scope of the environmental assessment and FONSI, and will be addressed by the interdisciplinary team as the design of the buildings progresses.

*Comment:* Building the new entrance 800 feet east of the existing entrance will result in unacceptable impacts upon the park. Instead, the NPS should rehabilitate the existing entrance on site, and revegetate the site of the 1955 contact station. The additional queuing lane proposed under Alternative 3 will provide adequate space for stacked vehicles, and expecting to wait to enter Yellowstone is acceptable.

*Response:* As explained in the EA, retaining the entrance at its existing site would not provide adequate reaction distance for entering visitors, which in turn will continue unnecessary congestion, confusion, and air pollution. Further, providing an enjoyable visitor experience is part of the National Park Service mission. Providing expeditious and enjoyable entrance experiences is one part of that mission, especially because the entrance station ranger is the only one many visitors contact. Furthermore, acreage disturbed under the two build options is practically equal. Finally, the site of the 1955 contact station was rehabilitated decades ago; although signs of development are still visible, they are gradually disappearing as the trees mature.

*Comment:* The proposed design does not incorporate technology to disperse vehicle exhaust.

*Response:* The proposal includes installing low velocity, high volume fans to disperse pollutants that collect under the canopy.

*Comment:* By selling advance passes in the surrounding communities, we could reduce the backup at the entrance station.

*Response:* Visitors may already purchase park passes at the Chamber of Commerce in both summer and winter. All winter visitors must buy their passes there. However, even with the relatively limited numbers of winter visitors, some still arrive at the entrance station without a pass and must be sent back to town. Given the thousands of visitors entering the park through this entrance daily in the summer, it would be impossible to reach every last visitor. Therefore, we must continue to make passes available at the entrance while making them available in town. Further, the entrance station will be designed to be able to be altered to adapt to new technologies as they evolve.

*Comment:* None of the alternatives includes adequate parking in West Yellowstone for present uses or for future mass transit options.

*Response:* Such parking lots are outside the scope of this project.

*Comment:* Design the new entrance so that visitors must stop before reaching the entrance gate and rangers may approach them on foot to disseminate information and answer questions.

*Response:* Rangers at the West Entrance already do circulate among stacked vehicles, answering questions and directing those with prepaid passes to the express lane. Even with this procedure, traffic still backs up, demonstrating the need for an improved entrance station, particularly one with a usable express lane.

*Comment:* Several commentors wrote with other more specific design suggestions, including the following: 1) project architects and engineers need to seek the input of entrance station staff, particularly regarding ergonomic design issues; 2) the administration building should not block prevailing winds from entering the canopy area; 3) retain the pit toilets; and 4) many very specific design criticisms.

*Response:* The National Park Service has actively sought, and will continue to involve, the entrance staff in the design process. The Service conducted an ergonomic study, and forwarded the results to the project architect for incorporation into the design where practicable. The Service will retain the pit toilet. The remaining suggestions and criticisms have been supplied to the project engineer and architect, who will consider them as design proceeds. The drawings included in the EA were preliminary; very specific design issues will be addressed as the design and development phases of the project unfold.

#### **Errata Sheet West Entrance Project Environmental Assessment**

Review of the Environmental Assessment discovered three errors:

- 1) The date on the front cover should have been September, 2003, not June 2003 as written.
- 2) The "Environmental Consequences" chapter title was omitted from the text and table of contents. It began with the "Overview" section on page 48.
- 3) On pages 76, 77, 80, and 82, references are incorrectly made to the enabling legislation of Saguaro National Park; the correct enabling legislation is that of Yellowstone National Park.