

May 24, 2017

Fishing Bridge to Indian Pond Reconstruction  
Yellowstone National Park  
Attn: Compliance Office  
PO Box 168  
Yellowstone Park, WY 82190

Re: Proposal to Reconstruct the East Entrance Road from Fishing Bridge to Indian Pond

Dear Superintendent Wenk;

The Cody Country Chamber of Commerce appreciates the opportunity to contribute to the planning process for the Fishing Bridge-Indian Pond Road reconstruction. As we stated last year during the initial scoping, the Cody community recognizes that improvement to infrastructure is vital for your success and ours. We provide these comments representing the interests of our membership, numbering 605 individuals and businesses.

Furthermore, the Cody Chamber also has, as a positive consequence of being at the center of this historic gateway community for decades, a clear insight and deep understanding of the needs and issues of the traveling publics that visit Yellowstone National Park. We know, first-hand, that what affects the traveling publics directly and indirectly affects the socio-economics of this community and its environs. These public comments encompass all such considerations.

### **Socio-Economic Impact**

Proposed road and infrastructure projects are not new for either Yellowstone National Park or Cody. It is therefore very disconcerting to be presented with an environmental assessment that **dismisses** Socio-Economics as a source of concern. (Table 1 - Page 12)

***Citing only the possible impacts of monies spent by the construction workers, inside and outside YNP, while working on the project as being of negligible impact is unintentionally insulting.***

Experienced YNP professionals know very well that there will be socio-economic impacts to the Cody community. Those impacts will range from mild to significant depending on how road closures and travel delays are managed. This is not new information. It is, however, a legal and financial reality that YNP clearly wants to ignore because socio-economic impacts are more difficult to manage in a reasonable and respectful manner.

Our scoping comments raised concerns about the proposed federal actions as they would relate to travel delays and road closures. Socio-economic issues and concerns are embedded in those comments. Yellowstone NP professionals and the general public are aware of our symbiotic relationship from experience and past efforts to work together. Why is the Park not bringing that forward out of respect for this effort?

### **Closures and/or Delays for Public Access**

The discussion provided on page 27 of the Environmental Assessment leaves a great many things to chance. Without an actual disclosure of proposed closure dates or a commitment to limited delays, the only certainty is that the public will have no ability to plan. The public has many choices and significant travel delays and road closures guarantee they will result in the travelers' decision to go elsewhere. Hence, the socio-economic impact described above.

We are requesting that a much more in-depth discussion on these topics (closures/delays) be conducted between the Park officials and Cody community leaders. We need and deserve more certainty and considerations than found in the simplistic presentation provided in this EA.

### **Potential Impact from Disruption in Traffic**

While the science of measuring impact is imperfect, there is data to support the significance of a closure to the east entrance road. The Cody Chamber of Commerce Visitor Center tracks the number of visitors to their facility. Additionally, the State Department of Revenue collects detailed Sales and Lodging Tax data. These sources allow us to make strong assumptions.

The trend in tourism has grown in the fall shoulder season dramatically during the period 2008 to 2016. The following table demonstrates that growth. Bear in mind that the early season traffic has grown as well, but is similar proportion to the mid-summer months.

While there are many underlying reasons for this spike in Fall visitation, the reasons are less important than the fact that closures during the months of September and October would be extremely detrimental to our local visitor-based businesses.

Month	2008	2016	Growth (%)
August	13,066	18,434	141%
September	9,502	18,592	196%
October	1,881	4,267	227%

This assumption is supported by a similar increase in the Lodging Tax collected in the Fall months. The Lodging Tax monthly collection averages \$134,883. Cumulative collections for September and October of 2010 were \$460,550. In 2016, the collections were \$609,880, an increase of \$132%.

Sales tax, collected at 4% of most visitation purchases, essentially debunks the idea of September and October being a shoulder season. Average collections in Park County are \$246,686 per month. The monthly collections in September and October were at average or substantially (132%) higher. Collections in both months eclipsed the May collections over the past two years, paralleled by the September collections exceeding June's for the past five seasons.

In our opinion, these offer irrefutable proof that traffic interruptions, whether they be delays or closures would be detrimental to our local economy. As such, the Environmental Assessment's dismissal as having a "negligible" socio-economic impact is entirely in error.

In the opinion of the Cody Chamber of Commerce, the proposed action alternatives in this Environmental Assessment fail in the context of ***“good faith efforts”*** to consider and/or address the socio-economic impacts. We view this as a violation of the National Environmental Policy Act and we request it be substantively rectified. The final determination of this Environmental Assessment should clearly include recognition of potential negative socio-economic impacts and specifically address how they will mitigate and avoid detrimental impacts.

This community is, as always, ready to work proactively with the Park to create solutions for issues of mutual concern. For many years this community has stepped up to support Park initiatives and even aided in getting the East gate open when Park budgets couldn't do so (2013). Yellowstone and its gateway communities succeed through this reciprocal relationship.

Please keep us advised regarding progress toward these projects.

Sincerely,

Tina Hoebelheinrich, Executive Director

Mark Westerling, President