

Chapter 1: Purpose and Need

Introduction

The National Park Service has prepared an environmental assessment identifying and evaluating four alternatives for the comprehensive rehabilitation of The Ahwahnee hotel and its associated structures and grounds in Yosemite Valley within Yosemite National Park, California (Figure 1-1). After more than 80 years in service, the hotel is in need of rehabilitation and repair in order to assure the public health, safety, and welfare of visitors and employees, and to make certain that the facility remains open and operational for future overnight guests and day visitors to experience.

This environmental assessment is intended to meet the requirements of the National Environmental Policy Act and the implementing regulations promulgated by the Council on Environmental Quality, and also to meet the requirements of section 106 of the National Historic Preservation Act.

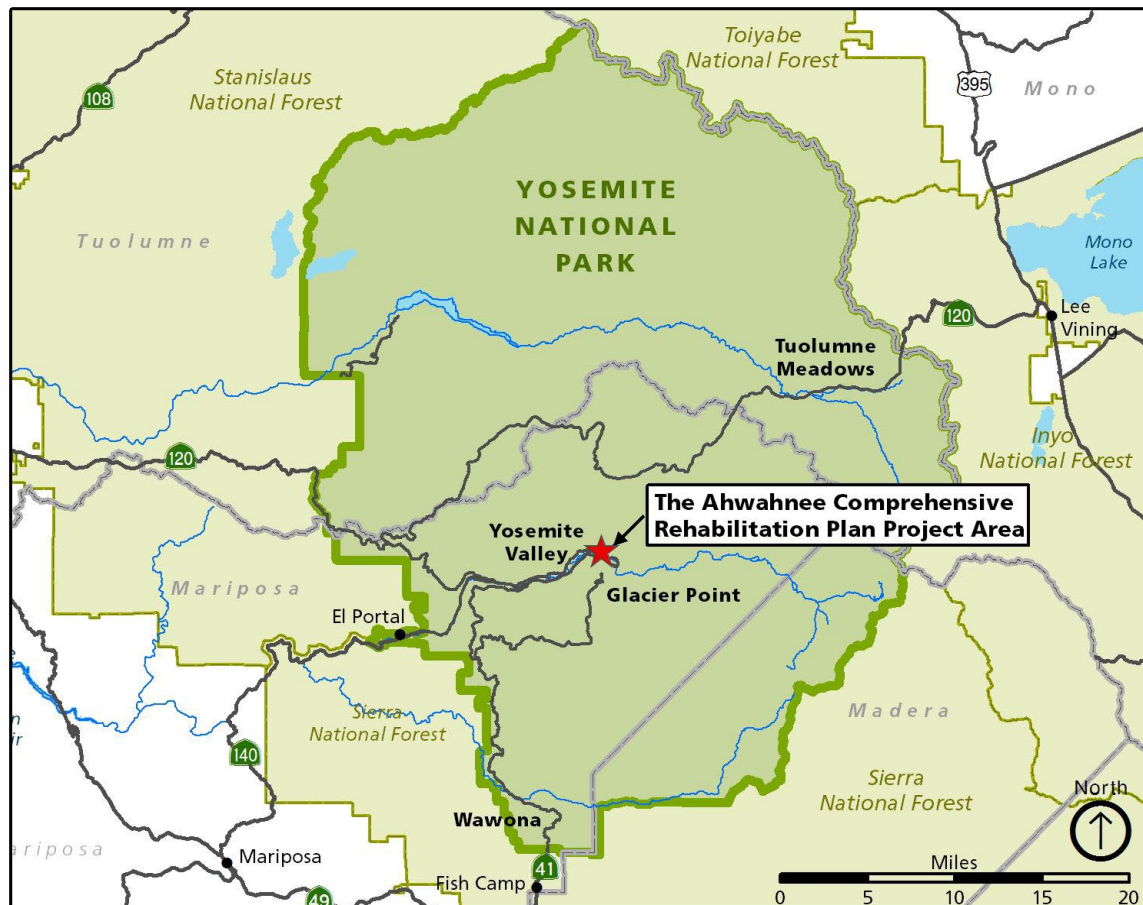


Figure 1-1 Project vicinity

Background

The Ahwahnee hotel was envisioned by Stephen T. Mather, the first Director of the National Park Service, as a grand hotel providing luxury accommodations to attract wealthy and influential visitors to Yosemite Valley. The hotel was designed by architect Gilbert Stanley Underwood for the Yosemite Park and Curry Company, and construction was completed in 1927. In 1928, eight cottages designed by architect Eldridge (Ted) Spencer were built within an adjacent grove of pines to the east of the main building. Other features within The Ahwahnee developed area include a parking area to the north, an employee dormitory to the west, and landscaping designed by Frederick Law Olmstead, Jr.

The Ahwahnee is situated at the eastern end of Yosemite Valley with outstanding views of natural features, including Half Dome, Yosemite Falls, and Glacier Point. Its siting below the Royal Arches rock formation is integral to its design and expression (Figure 1-2).



Figure 1-2 Photograph of The Ahwahnee hotel, September 1985
NPS Photo

With the solid massing of a rock pile buttressed by flared stone piers, the seven-story structure was designed to reflect the surrounding natural conditions and the raw resources of the Sierra. Within the context of the development of the National Park Service Rustic architectural style, The Ahwahnee exemplifies the philosophy of melding the built environment into a natural setting on a grand scale, with deference to the landscape.

The Ahwahnee hotel was listed on the National Register of Historic Places in 1977 and was designated a National Historic Landmark in 1987. The Ahwahnee is a symbol of design excellence, 1920s architectural ideals, and Rustic style architecture on a previously unimagined scale. Historically, The Ahwahnee is significant for its role in the development of tourism, national parks, the concessions industry, and in the then-emerging appreciation of American citizens for the national park system and the great outdoors. The Ahwahnee is also historically important for numerous associations with nationally renowned Americans who made great contributions in the fields of architecture, landscape architecture, government, social history, and recreation.

In its early years, The Ahwahnee was an exclusive destination that catered to distinguished and affluent guests. Over time, the hotel achieved international fame for its architecture and setting amidst the natural beauty of Yosemite National Park, and the hotel continued to host national and international dignitaries throughout much of the 20th century. During World War II, The Ahwahnee buildings and grounds were converted for use by the U.S. Navy as a convalescent hospital from 1943 to 1945. Rehabilitation and restoration of the hotel exterior and the interior finishes, and re-furnishing the hotel began after the Navy left in 1945. For the next 25 years, the property was maintained, some fire safety improvements were implemented, and amenities such as a swimming pool were added to meet changing guest expectations.

In 1977, a restoration and refurbishment program began that was “designed to assure the continued elegance, comfort, and historical accuracy of the Yosemite landmark for years to come,” (Yosemite Park and Curry Company 1979). Both interior and exterior issues were addressed under this program, including restoration of the building’s concrete rafters, balconies, and wooden outriggers. Other major undertakings to improve facilities, systems, roofing, and guestrooms continued throughout the 1980s. In 1993, a change in contracting resulted in the federal government assuming ownership of concessioner-operated buildings in Yosemite National Park. Since 1993, there have been code upgrades and various building improvements, including re-roofing projects, remodeling of certain guestrooms for improved accessibility, mechanical upgrades, and the continued refurbishment of guestroom interiors in the cottages and throughout the hotel.

Today, The Ahwahnee is a NPS-owned and concessioner-operated luxury hotel that provides year-round visitor accommodations, dining, special events, and retail sales. It remains one of the more regularly visited attractions by both day and overnight visitors to the park.

However, after more than 80 years in service with periodic upgrades and repairs, facilities at The Ahwahnee are not fully compliant with current fire protection and building codes, recommended seismic safety practices, and accessibility codes and guidelines. Many of the electrical, plumbing, and mechanical systems are aging and need to be replaced or updated. In addition, some historic hotel finishes and landscape components have deteriorated or been altered over the years, potentially affecting the historic integrity of this National Historic Landmark. A comprehensive rehabilitation program is needed to address numerous code deficiencies, outdated equipment, and conditions that may impact the historic integrity of the site.

Purpose of and Need for the Project

Purpose of the Project

In order to achieve goals and directives set forth in federal law, policy, and guidelines, as well as the 1980 *General Management Plan* and the 1992 *Concession Services Plan*, this project will develop a comprehensive plan for phased, long-term rehabilitation of The Ahwahnee hotel and its associated structures. Specifically, this comprehensive rehabilitation plan will identify actions to:

- Improve visitor and employee safety by bringing The Ahwahnee into compliance with current building, fire protection, and seismic safety standards;
- Preserve and protect the historic integrity and character-defining features of The Ahwahnee by rehabilitating aged or altered historic finishes;
- Improve hotel energy and water-use efficiency and operations by repairing or replacing outdated or inefficient building systems and components;
- Maintain the traditional level of visitor service and the visitor experience at The Ahwahnee through improved operational efficiency, increased accessibility, and rehabilitation of historic resources.

Need for the Project

Although The Ahwahnee generally complied with building standards in effect at the time of construction, after more than 80 years in service, the hotel and associated structures and landscape features require upgrades to meet current fire, seismic safety, health, and accessibility

codes. Rehabilitation work is needed to maintain and protect the historic integrity of The Ahwahnee as well as the visitor experience at this National Historic Landmark for future generations.

The National Park Service, in partnership with the current park concessioner, Delaware North Companies Parks & Resorts at Yosemite (DNC), has undertaken several studies of The Ahwahnee facilities in recent years to assess the overall code compliance and condition of structures and grounds. The most recent of these studies include:

- *Operational Program for The Ahwahnee Comprehensive Rehabilitation Plan* (Hornberger+Worstell 2010c)
- *The Ahwahnee Hotel Seismic Evaluation and Rehabilitation Alternatives* (Degenkolb Engineers 2010)
- *The Ahwahnee Historic Rehabilitation Program* (Hornberger+Worstell 2011)
- *The Ahwahnee Comprehensive Rehabilitation Plan 50% and 100% Conceptual Design Alternatives* (Hornberger+Worstell 2009, 2010a)
- *The Ahwahnee Historic Structures Report* (Architectural Resources Group [ARG] 2011)
- *The Ahwahnee Cultural Landscape Report* (AECOM and ARG 2011)

These condition assessments and life-safety and seismic stability evaluations, have identified the need for rehabilitation, repair, replacement, and/or improvement of multiple structural, mechanical, electrical, plumbing, circulation, and landscape components, as well as deteriorated or altered historic features and finishes. In addition, opportunities to improve operational, energy, and water-use efficiencies have been identified.

Specifically, the hotel, cottages, and dormitory are not fully compliant with current California Building Code (CBC) (adopted by Yosemite National Park as the governing code for The Ahwahnee Comprehensive Rehabilitation Plan), National Fire Protection Association (NFPA) fire and life-safety consensus code, health code, and Interagency Committee on Seismic Safety and Construction (ICSSC) seismic safety recommended practices. Additionally, structural improvements are needed to ensure visitor and employee safety. Site and building improvements also are needed to improve accessibility for disabled persons to all hotel facilities, in accordance with *Americans with Disabilities Act Accessibility Guidelines* requirements.

In addition, mechanical, plumbing, and electrical components in the hotel and cottages have exceeded their design lives, are inefficient, and/or are not fully code-compliant, and are in need of repair or replacement. Heating and air conditioning system upgrades are needed at the hotel, cottages, and dormitory, and upgraded utility connections between the hotel and cottages, and between the hotel and dormitory, are required. Kitchen and Ahwahnee Bar upgrades also are needed to improve operational efficiency and assure that the traditional level of service is maintained, as required by the park's 1980 *General Management Plan*. Lastly, many historic features and finishes, both exterior and interior, of the main hotel building and the cottages are deteriorating or have been altered, and need repair or rehabilitation to maintain the integrity of this significant cultural resource and to maintain the visitor experience.

Policy and Planning Context

Several established policies and plans provide direction for The Ahwahnee Comprehensive Rehabilitation Plan.

Regulations and Policies

National Park Service Organic Act (Title 16, United States Code [16 USC] sections 1 through 4)

In 1916, the Organic Act established the National Park Service in order to “promote and regulate the use of parks. . .” The stated purpose of national parks is “to conserve the scenery and natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.” The Organic Act establishes the management responsibilities of the National Park Service. While Congress has given the National Park Service the management discretion to allow certain impacts within parks, that discretion is limited by the statutory requirement that park resources and values be left unimpaired. It ensures that park resources and values will continue to exist in a condition that allows future generations to enjoy them. NPS Management Policies provide additional guidance on impairment of park resources and values (NPS 2006a).

1970 National Park Service General Authorities Act (as amended by the 1978 Redwood amendment) (16 USC section 1a)

This act prohibits the National Park Service from allowing any activities that would cause derogation of the values and purposes for which the parks have been established (except as directly and specifically provided by Congress in the enabling legislation for the parks). Parks also adhere to other applicable federal laws and regulations, such as the Endangered Species Act, the National Historic Preservation Act, the Wilderness Act, and the Wild and Scenic Rivers Act. To articulate its responsibilities under these laws and regulations, the National Park Service has established management policies (NPS 2006a) for all units under its stewardship.

National Environmental Policy Act (NEPA) (1969) (42 USC 4341 *et seq.*)

NEPA requires the identification and documentation of the environmental consequences of federal actions. Regulations implementing NEPA are set by the President’s Council on Environmental Quality (CEQ) (Title 40, Code of Federal Regulations [40 CFR] Parts 1500-1508). CEQ regulations establish the requirements and process for agencies to fulfill their obligations under the act. In compliance with NEPA, this environmental assessment will evaluate potential project impacts on the human environment. Compliance with the National Historic Preservation Act (see below) is integrated into the NEPA compliance process, using NHPA criteria for the analysis of impacts on cultural resources. The NEPA process is also used to coordinate compliance with other federal laws, regulations, and orders applicable to this environmental assessment, including but not limited to

- Clean Air Act (as amended) (42 USC 7401 *et seq.*)
- Endangered Species Act (16 USC 1531 *et seq.*)
- Wild and Scenic Rivers Act (16 USC 1271)
- Executive Order 11593: Protection and Enhancement of the Cultural Environment
- Executive Order 13514: Federal Leadership in Environmental, Energy, and Economic Performance

National Historic Preservation Act (NHPA) (1966 as amended) (16 USC 470)

Section 106 of the NHPA directs federal agencies to take into account the effect of any undertaking (a federally funded or assisted project) on historic properties. A "historic property" is any district, building, structure, site, or object, including any resource considered by American Indians to have cultural and religious significance, that is eligible for listing in the National Register of Historic Places because the property is significant at the national, state, or local level in American history, architecture, archeology, engineering, or culture. Section 106 also provides the Advisory Council on Historic Preservation (ACHP) and the State Historic Preservation Officer (SHPO) an opportunity to comment on assessment of effects anticipated from the undertaking. For this project, Yosemite National Park's section 106 review process is governed by the *Programmatic Agreement Between the National Park Service, Yosemite National Park and the California State Historic Preservation Officer Regarding The Ahwahnee Hotel National Historic Landmark Comprehensive Rehabilitation Program, Mariposa County, California* (2011 Programmatic Agreement)(Appendix A) developed in consultation with the SHPO. In compliance with section 106 of the NHPA, this environmental assessment will evaluate potential project effects on historic properties.

Americans with Disabilities Act of 1990 (ADA) (as amended) (42 USC 12101 et seq.)

ADA requires accessibility to places of public accommodation and to commercial facilities by individuals with disabilities. Compliance with ADA requirements is guided by *The Americans with Disability Act Accessibility Guidelines* (ADAAG). While most historic buildings and landscapes were not designed to be readily accessible for people with disabilities, making these properties- and the activities within them- more accessible to people with disabilities is a goal of the National Park Service, as detailed in Director's Order 16A, *Accessibility for Employees and Job Applicants* and Director's Order 42, *Accessibility for Park Visitors*.

Architectural Barriers Act of 1968 (ABA) (as amended) (42 USC 4151 et seq.)

The ABA requires access to facilities designed, built, altered, or leased with federal funds. An Access Board develops and maintains accessibility guidelines under this law. These guidelines serve as the basis for the standards used to enforce the law. Federal agencies are responsible for ensuring compliance with the ABA standards when funding the design, construction, alteration, or leasing of facilities. Compliance with ABA guidelines also is an NPS goal, as detailed in Director's Orders 16A and 42.

The Archeological Resources Protection Act of 1979 (ARPA) (16 USC 470aa- 470ll)

ARPA prohibits unauthorized excavation of archeological sites on federal land and other acts involving cultural resources, and implements a permitting process for excavation of archeological sites on federal or Indian lands (see regulations at 43 CFR 7). ARPA also provides civil and criminal penalties for removal of, or damage to, archeological and cultural resources. The analysis of historic properties included in Chapter 3 complies with ARPA.

The Native American Graves Protection and Repatriation Act of 1990 (NAGPRA) (25 USC 3001 et seq.)

NAGPRA provides for the protection and repatriation of Native American human remains and cultural items and requires notification of the relevant Native American tribe(s) upon accidental discovery of cultural items (see implementing regulations at 43 CFR 10). Resources covered by NAGPRA may be present within the project area; if they are encountered during project

implementation, these resources would be managed in accordance with the 2011 Programmatic Agreement (Appendix A).

The American Indian Religious Freedom Act of 1978 (AIRFA) (as amended) (42 USC 1996)

AIRFA preserves for American Indians and other indigenous groups the right to express traditional religious practices, including access to sites under federal jurisdiction. Access to American Indian traditional religious practice sites in the project area is provided for in the 2011 Programmatic Agreement.

Executive Order No. 13007: Indian Sacred Sites

Executive Order 13007 directs federal agencies with statutory or administrative responsibility for the management of federal lands, to the extent practicable, to accommodate access to and ceremonial use of Indian sacred sites by American Indian religious practitioners and to avoid adversely affecting the physical integrity of such sacred sites. For this project, the 2011 Programmatic Agreement (Appendix A) would apply with respect to government-to-government consultation and the respect given to American Indian spiritual places and access for activities at The Ahwahnee.

Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards)

The Standards are prepared under the authority of NHPA sections 101(f) (g), and (h), and NHPA section 110. The Standards are intended to promote responsible preservation practices that help protect irreplaceable cultural resources. The Standards are not intended to make decisions about which features of a historic building should be saved and which can be changed. Rather, once a treatment is selected, the Standards provide guidance for consistency in the proposed work.

The four treatment approaches are Preservation, Rehabilitation, Restoration, and Reconstruction. Preservation places a high premium on the retention of all historic fabric through conservation, maintenance, and repair. Rehabilitation emphasizes the retention and repair of historic materials, but more latitude is provided for replacement because it is assumed the property is more deteriorated prior to work. Restoration focuses on the retention of materials from the most significant time in a property's history, while permitting the removal of materials from other periods. Reconstruction establishes limited opportunities to re-create a non-surviving site, landscape, building, structure, or object in all new materials. The proposed project is considered a rehabilitation effort (AECOM and ARG 2011, ARG 2011).

2006 National Park Service Management Policies

Management Policies 2006 is the service-wide policy document of the National Park Service. The following excerpts from the Management Policies specifically pertain to The Ahwahnee Comprehensive Rehabilitation Plan. NPS Management Policies state:

The National Park Service will employ the most effective concepts, techniques, and equipment to protect cultural resources against theft, fire, vandalism, overuse, deterioration, environmental impacts, and other threats without compromising the integrity of the resources" (NPS 2006a, Chapter 5).

The National Park Service will provide persons with disabilities the highest feasible level of physical access to historic properties that is reasonable, consistent with the preservation of each property's significant historical features. Access modifications

for persons with disabilities will be designed and installed to least affect the features of a property that contribute to its significance. (NPS 2006a, Chapter 5).

The National Park Service will provide visitor and administrative facilities that are necessary, appropriate, and consistent with the conservation of park resources and values. Facilities will be harmonious with park resources, compatible with natural processes, esthetically pleasing, functional, energy and water efficient, cost-effective, universally designed, and as welcoming as possible to all segments of the population. NPS facilities and operations will demonstrate environmental leadership by incorporating sustainable practices to the maximum extent practicable in planning, design, siting, construction, and maintenance (NPS 2006a, Chapter 9).

Through the use of concession contracts or commercial use authorizations, the National Park Service will provide commercial visitor services that are necessary and appropriate for public use and enjoyment. Concession operations will be consistent to the highest practicable degree with the preservation and conservation of resources and values of the park unit. Concession operations will demonstrate sound environmental management and stewardship (NPS 2006a, Chapter 10).

National Park Service Director's Orders

The proposed action is consistent with, but not limited to, the following NPS Director's Orders:

- Director's Order 12: Conservation Planning, Environmental Impact Analysis and Decision-making
- Director's Order 16A: Accessibility for Employees and Job Applicants
- Director's Order 28: Cultural Resource Management
- Director's Order 42: Accessibility for Visitors with Disabilities in National Park Service Programs and Services
- Director's Order 50B: Occupational Safety and Health Program
- Director's Order 58: Structural Fire Management

Applicable Codes and Standards

National Fire Protection Association Codes

Per NPS *Director's Order 58: Structural Fire Management* (DO-58), the National Park Service has adopted the current version of the National Fire Protection Association (NFPA) codes and standards as recommended practices for fire prevention, protection, and life-safety. Codes applicable to this project include NFPA 1-Fire Prevention, NFPA-101 Life Safety Code, and NFPA 914-Code for Fire Protection of Historic Structures. DO-58 recognizes that NPS-adopted standards may sometimes conflict with state or local codes; in these cases, the National Park Service will defer to the most stringent requirement. For this project, fire and life-safety provisions are generally per the applicable portions of NFPA 101.

2007 California Building Code (CBC) (Health and Safety Code of 18950, et seq.) and (Title 24, Part 2, California Code of Regulations)

The California Building Code is based directly on the 2006 International Building Code (IBC), but the 2007 CBC adds special provisions for seismic design and accessibility to the 2006 IBC. For this project, the CBC is used for occupancy classification, determination of construction types and the related height and areas allowed by those building codes. Fire and life-safety provisions would generally be per the applicable portions of NFPA code (see above).

2007 California Historical Building Code (CHBC) (Health and Safety Code of 18950, *et seq.*) and (Title 24, Part 8, California Code of Regulations)

While the 2007 California Building Code (above) makes provisions for the special treatment of qualified historic buildings (CBC, section 3403.5), the 2007 California Historical Building Code amplifies and codifies this protection. The CHBC governs all other statutes or regulations as they may apply to qualified historic buildings; thus, it modifies the CBC. The CHBC endorses a case-by-case approach to find and adopt reasonable alternatives or reasonable levels of equivalency for situations where strict compliance with established statutes or regulations would negatively affect a historic resource. For this project, application of the CHBC affected alternatives for meeting accessibility standards, seismic design, and design of mechanical, electrical, and plumbing systems.

Interagency Committee on Seismic Safety and Construction Recommended Practice 6: Standard of Seismic Safety for Existing Federally Owned and Leased Buildings (ICSSC RP6)

ICSSC RP6 was developed in conjunction with the National Institute of Standards and Technology in response to Public Law 101-614 and pursuant to Executive Order 12941. RP6 identifies the triggers for when seismic rehabilitation of federal buildings is required and provides evaluation and mitigation requirements. Per section 2.1(b), because this project has the potential to “significantly extend the building's useful life through alterations or repairs which total more than 30% of the replacement value of the facility,” a seismic evaluation and rehabilitation following the provisions of RP6 are required.

RP6 cites Federal Emergency Management Agency (FEMA) standards 310 and 356, which have since been superseded by *American Society of Civil Engineers (ACSE) 31-03: Seismic Evaluation of Existing Buildings* and *ASCE 41-06: Seismic Rehabilitation of Existing Buildings*. The above are referenced from the 2007 CBC, and therefore may be modified by the CHBC.

For this project, a seismic evaluation of The Ahwahnee hotel, cottages, and dormitory (Degenkolb Engineers 2010) was used to develop alternative options for meeting seismic standards.

Accessibility Codes

The governing accessibility standards and codes for this project are:

- *Americans with Disabilities Act Accessibility Guidelines*, current version as incorporated into:
- The 2007 CBC, Chapters 11A and 11B, as modified by:
- The 2007 CHBC

Mechanical, Electrical, and Plumbing Codes

For this project, the California Mechanical Code (CMC) and the California Plumbing Code (CPC) are used in conjunction with the 2007 CBC, for systems design code standards. This includes the California Title 24 standards for energy use and conservation. This project also applies the 2007 California Electrical Code, which is based on the 2005 National Electric Code (NEC).

Park Plans and Guidelines

The purpose of and need for The Ahwahnee Comprehensive Rehabilitation Plan must be, to a large degree, consistent with existing park planning documents. Documents that pertain to this rehabilitation planning effort include the following:

1980 Yosemite National Park General Management Plan

The goals for The Ahwahnee area described in the *General Management Plan* all relate to visitor use: to retain the traditional Ahwahnee character and level of service, but remove outdoor activities that are not directly related to the natural resources. The *General Management Plan* calls for the following specific actions related to The Ahwahnee:

- Retain the 99 Ahwahnee hotel rooms and 22 (original) cabin rooms
- Retain the dining room, gift shop, bar, and other services
- Retain 132-car parking area
- Remove the tennis courts
- Remove the golf course

1992 Concessions Services Plan

The *Concessions Services Plan/SEIS* presented guidance for management of concession services in Yosemite National Park to meet *General Management Plan* goals. The *Concession Services Plan* amended the *General Management Plan*. The *Concession Services Plan* is consistent with the *General Management Plan* regarding actions at The Ahwahnee, with the following additions:

The number of rooms at The Ahwahnee would remain at the number available in 1991: 99 rooms in the hotel and 24 rooms in cottages (two cabin living rooms were converted to guestrooms in the time between the publication of the 1980 *General Management Plan* and the 1992 *Concessions Services Plan*).

2011 Ahwahnee Comprehensive Rehabilitation Plan Programmatic Agreement

Given the long-term nature of The Ahwahnee Comprehensive Rehabilitation Plan and the potential for adverse effect on the historic property from some of the needed code-driven actions, the National Park Service at Yosemite National Park and the California SHPO developed a programmatic agreement in accordance with 36 CFR Part 800.14(b). Culturally associated California Indian tribes and groups have been invited to participate in the programmatic agreement as concurring parties. The programmatic agreement, a standard, technical document under the National Historic Preservation Act, is used to clarify roles, responsibilities, and expectations of consulting parties engaged in large and complex federal projects that may have an impact on historic properties. The programmatic agreement documents the terms and conditions agreed upon during consultation to resolve the adverse effect.

The *Programmatic Agreement Between the National Park Service, Yosemite National Park and the California State Historic Preservation Officer Regarding The Ahwahnee Hotel National Historic Landmark Comprehensive Rehabilitation Program, Mariposa County, California* (2011 Programmatic Agreement) was executed in January 2011, and is included as Appendix A of this environmental assessment.

Merced River Comprehensive Management Plan Settlement Agreement

The Merced River was designated a wild and scenic river in 1987. The Ahwahnee developed area, including the hotel, parking and service areas, the employee dormitory, guest cottages, and grounds are located within the Merced Wild and Scenic River corridor boundary. To meet its resource management obligations under the Wild and Scenic Rivers Act, the National Park Service initiated a comprehensive river management planning process for the Merced Wild and Scenic River corridor in 1999. The subsequent Merced River Plan (2000) and Revised Merced River Plan (2005) were legally challenged, and both were rescinded. An outstanding lawsuit against the National Park Service in response to these plans was settled, and a legally binding Settlement Agreement was executed between National Park Service and former plaintiffs in September 2009 (see <http://www.nps.gov/yose/parkmgmt/upload/mrpsettlementagreement.pdf>).

The Settlement Agreement renewed efforts to complete a comprehensive management plan that will satisfy the requirements of the Wild and Scenic Rivers Act. Until such time a comprehensive management plan is completed and the Record of Decision for the plan is signed, the Settlement Agreement constrains actions that may be undertaken in much of Yosemite Valley, and therefore limits certain potential rehabilitation actions within The Ahwahnee developed area, particularly with respect to rehabilitation of features in the cultural landscape that are unrelated to the health and safety of visitors and employees, or accessibility.

For this reason, rehabilitation of the historic cultural landscape at The Ahwahnee is largely deferred to future site planning efforts, pending finalization of the comprehensive management plan for the Merced Wild and Scenic River.

Per section E (pages 14-16) of the September 2009 Settlement Agreement, upon completion of the appropriate environmental review and compliance, within the Merced Wild and Scenic River corridor the National Park Service:

...may conduct operations and maintenance activities, correct accessibility deficiencies, and carry out all other activities necessary to address the daily, routine, and intermittent operational requirements of Yosemite National Park, as long as such operations and activities will not influence or predetermine the NPS analysis of user capacity, including the types, levels, and location of uses, and are in full compliance with NEPA.

The following stipulations as agreed to within section E of the Settlement Agreement particularly affected the scope of this planning effort:

The NPS will not construct new roads, parking spaces, or bridges; NPS will not increase the number of overnight lodging accommodations; and the NPS will not pave any parking areas or trails that are currently unpaved. . . Routine operations, maintenance projects, and emergency responses are intended to stabilize and protect park facilities, address visitor health and safety issues, and protect natural and cultural resources. . . NPS is aware that correcting certain accessibility deficiencies is required to ensure that park visitors with disabilities have access to the opportunities and experiences in Yosemite National Park. Examples of repair work required to correct accessibility deficiencies include: reconfiguring existing facility paths of travel in developed areas; modifications to restrooms and fixtures; providing accessible routes, signage and information; and installation of required hardware and equipment.

Public Scoping Process

Public scoping was initiated for The Ahwahnee Comprehensive Rehabilitation Plan Environmental Assessment on August 13, 2009. A 45-day scoping period extended through September 26, 2009. The scoping period was subsequently extended through September 30, 2009, to accept comments that may have been submitted at the Yosemite National Park Public Open House held in September. Two public meetings were held for this project: a Park Public Open House at the East Auditorium in Yosemite Valley on August 26, 2009, and a public scoping meeting at The Ahwahnee on September 22, 2009. In addition, a public meeting was held at The Ahwahnee on September 8, 2009, and the project was featured at a Park Public Open House on September 30, 2009, at the East Auditorium in Yosemite Valley. Project materials were displayed and comments were accepted at each meeting.

Written public scoping comments were received at public scoping meetings, and by fax, email, U.S. mail, and online through the Planning, Environment, and Public Comment (PEPC) website (<http://parkplanning.nps.gov>). During the scoping period, eight comment letters were received, seven from individuals, and one from an organization. These letters generated 21 individual concern statements. The concern statements were categorized and considered for incorporation in the planning process. The *Public Scoping Concerns Report* prepared for The Ahwahnee Comprehensive Rehabilitation Plan, as well as copies of the original comments, can be reviewed online at http://www.nps.gov/yose/parkmgmt/ahwahnee_rehab.htm. Internal scoping and consultation with the California SHPO and other government agencies and with California Indian communities also informed the planning process. See Chapter 4, Consultation and Coordination, for more information on consultation procedures.

Issues and Concerns Addressed in this Document

The following issues were identified during the public scoping process:

- Maintain the historic integrity of the hotel
- Use native plants for landscape restoration
- Address the relationship of this project to the Merced Wild and Scenic River Comprehensive Management Plan planning process

Issues and Concerns Not Addressed in this Document

The following issues were identified during public scoping and are not addressed in this planning effort for the following reasons:

- **Remove the tennis courts.** This comprehensive rehabilitation plan does not include actions in the cultural landscape outside of code-driven emergency fire department access, utility upgrades, and ADA accessibility. Removal of the tennis courts is not addressed in this plan as it is unrelated to the purpose of and need for comprehensive rehabilitation at The Ahwahnee, as described above.
- **Address parking issues at The Ahwahnee.** Per the 2009 Settlement Agreement (see above), this comprehensive rehabilitation plan does not address parking spaces at The Ahwahnee other than to evaluate alternatives for accessible parking as required by code.
- **Remove trees to restore scenic views and vistas.** This comprehensive rehabilitation plan does not include actions in the cultural landscape outside of code-driven emergency access, utility upgrades, and ADA accessibility. Clearing of vegetation to restore scenic vistas is guided by the parkwide *Scenic Vista Management Plan*, which was released to the public for review in the fall

of 2010, and will provide a systematic program for documenting, protecting, and reestablishing Yosemite's important viewpoints and vistas. A decision document for the *Scenic Vista Management Plan* is expected in 2011.

In addition, four public scoping letters without substantive comments were submitted for consideration. These letters contain comments that did not provide enough information to be put in context, or were anecdotes about experiences related to The Ahwahnee. All comments received during the scoping period have been duly considered and are now part of the administrative record for this project.

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