



The Ahwahnee Comprehensive Rehabilitation Plan

Finding of No Significant Impact

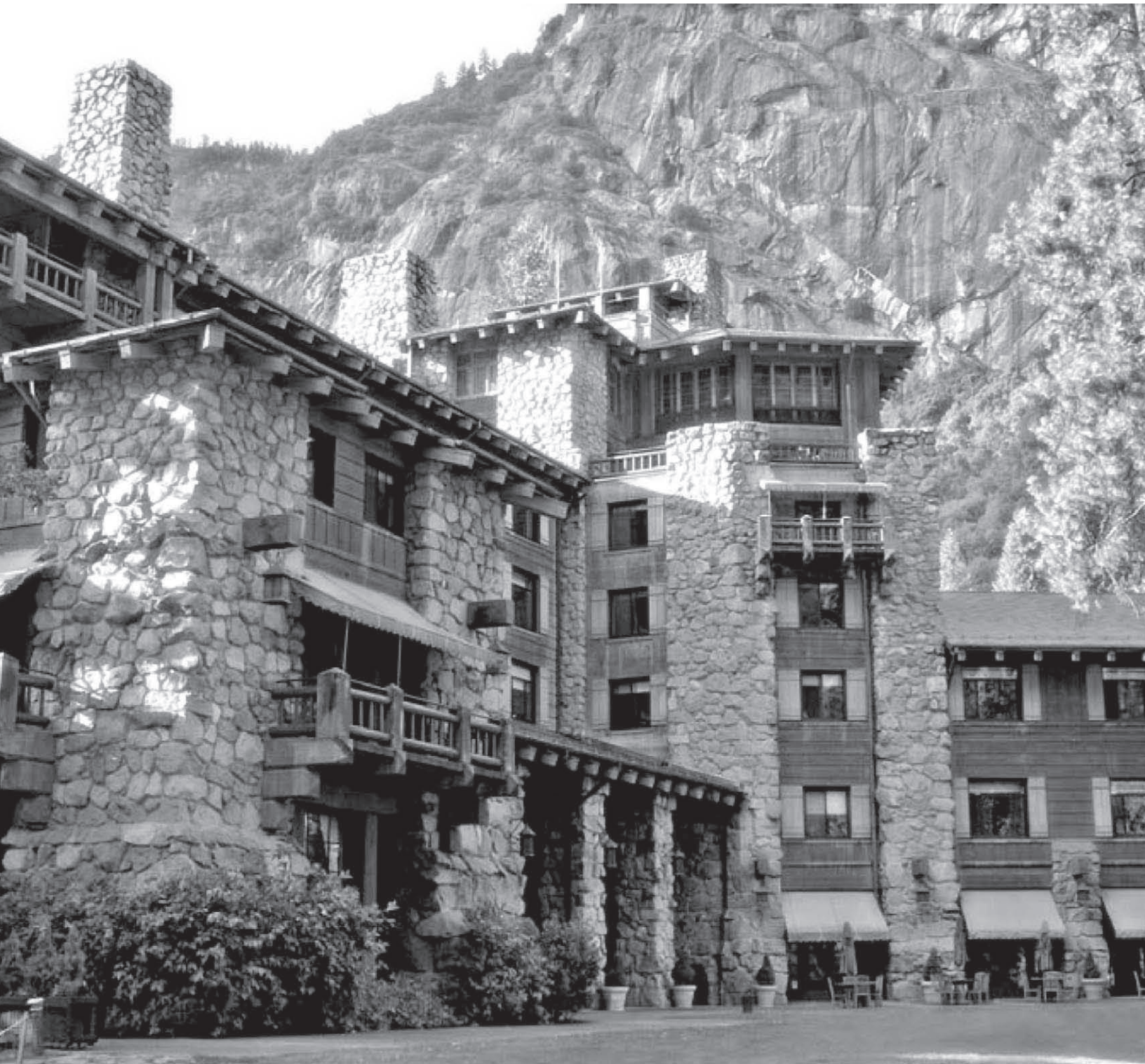
Errata Sheets

Programmatic Agreement

Wild and Scenic River Section 7 Determination

Public Comment and Response Report

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Introduction

This Finding of No Significant Impact documents the decision of the National Park Service (NPS) to adopt a plan for the comprehensive rehabilitation of The Ahwahnee hotel and related structures, and the determination that no significant impacts on the human environment are associated with that decision.

Purpose and Need

The Ahwahnee has operated as a luxury hotel almost continuously since it opened in 1927. The Ahwahnee was listed on the National Register of Historic Places in 1977 and was designated a National Historic Landmark in 1987 for its architectural significance.

Although The Ahwahnee generally complied with building standards in effect at the time of construction, after more than 80 years in service, facilities at The Ahwahnee are not fully compliant with current fire protection and building codes, recommended seismic safety practices, and accessibility codes and guidelines. Recent condition assessments have identified the need for rehabilitation, repair, replacement, and/or improvement of multiple structural, mechanical, electrical, plumbing, circulation, and landscape components, as well as rehabilitation of deteriorated or incompatibly altered historic features and finishes. In addition, opportunities to improve accessibility and operational and energy efficiencies have been identified. Specifically, this comprehensive rehabilitation program identifies 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- Improve hotel energy and water-use efficiency and operations by repairing or replacing outdated or inefficient building systems and components;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.

Selected Action and Range of Alternatives Considered

The Ahwahnee Comprehensive Rehabilitation Plan Environmental Assessment (EA), dated July 2011, describes and analyzes four alternatives, including a No Action Alternative and three action alternatives: Alternative 1, Alternative 2, and Alternative 3 (Preferred Alternative). These alternatives represented a reasonable range of options that satisfied the purpose of and need for the project, met relevant legal requirements, and satisfied park policies and guidelines.

Selected Action: Alternative 3

The Selected Action is substantively the same as described for the Preferred Alternative, Alternative 3, in the environmental assessment with the exception of accelerating one action - providing an additional means of egress from the hotel's South Mezzanine - by implementing it under the existing 2011 5th and 6th Floor Egress Project. This action was accelerated due to the need to address critical code compliance issues identified by the park's Fire Marshal and to ensure continued visitor access to the hotel's South Mezzanine meeting rooms.

The Selected Action provides the most cost-efficient means of addressing fire, seismic, life-safety, health, and accessibility code and standard deficiencies at the hotel; improving obsolete building systems and operational efficiency; and improving visitor experience while minimizing impacts on historic fabric and features to the maximum extent practicable.

The Selected Action also provides historic rehabilitation of features throughout the hotel and cottages that are rated in *The Ahwahnee Historic Structures Report* (Architectural Resources Group [ARG] 2011; developed in support of the comprehensive rehabilitation plan) as being in "poor" condition, but in addition includes rehabilitation and preservation of historic fabric and features in "fair" condition in spaces that are considered historically "very significant" and "significant."

The purpose and need objectives for the comprehensive rehabilitation plan are divided into seven (7) program categories, as follows:

- Fire /Life-Safety Compliance
- Seismic Safety Recommended Practice Compliance and Structural Strengthening
- Accessibility Compliance
- Historic Rehabilitation
- Operational Efficiency
- Visitor Experience and Visitor Services
- Energy/Water-Use Efficiency and Sustainability

A summary of activities included under the Selected Action, organized by program category, is presented as Table 1.

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Table 1.
Summary Description of the Selected Action

Issue Evaluated	Alternative 3 (Selected Action)
<i>FIRE / LIFE-SAFETY COMPLIANCE</i>	
Code compliant egress at East Wing (second floor to ground floor)	Remove existing spiral stair. Construct new interior stair from second to first floor; reduces guestrooms by 2 rooms. Provide new exterior exit stair from first floor to ground floor. Configuration of the egress will be combined with action to reconfigure Ahwahnee Bar (see Visitor Experience and Visitor Services, below).
Fire separation between Dining Room and hotel	Provide concealed overhead fire doors at openings at Dining Room entry, Kitchen door, and Diggins Suite. Confirm rating of existing walls.
Code compliance of service elevator for fire separation, controls, gurney and accessibility	Retain existing elevator cab and replace existing service side pocket door and cage. Maintain tilt-up gurney on site to address gurney requirements in existing cab retrofit.
Fire protection of steel members in attic spaces	Remove damaged material as necessary and reapply new fire protection at attics.
Non-rated vertical chase shafts; improve code compliance	Seal shafts at bottom and provide ducted boot at each toilet exhaust.
Linen chute and linen room	Improve fire resistance of shaft per vertical shaft protection and improve first floor linen room.
Fire department access to hotel	Improve and extend existing emergency access route to the west and south sides of the hotel to comply with fire code specifications. Prevent vehicle access on historic concrete terraces, and improve base of adjacent green areas to support truck load, code-compliant width, and code-required turnaround.
Fire department access to cottages	Extend existing emergency access road south of the cottages along the alignment of existing, unmaintained service road and improve it to comply with fire code specifications for width, surfacing, drainage crossings, and turnarounds. Replace existing culverts as needed. Remove select trees, regrade existing unmaintained road, and improve surface (gravel/pervious paving) as needed. Provide a code-required bridge at the seasonal drainage crossing for emergency access to cottages.
Master key system for emergency access to all hotel spaces	Re-key hotel locks on new master key system.
Electrical: water intrusion at distribution panels in basement	Retain existing main electrical distribution room in current location; provide full basement waterproofing and new secondary sump pump.
Electrical: water intrusion at emergency generator room from lowered 18" slab	Raise floor slab inside generator room to be above grade.
Electrical: improper grounding for electrical system	Ground main electrical panels and provide new grounded systems and short-circuit protection with upgrade of electrical system where accessible.
Electrical: deteriorating cloth-wrapped wiring and conduit	Replace accessible cloth-wrapped wiring with code compliant metal clad cable. Replace corroded conduit runs in Kitchen with material suitable for the wet conditions.
Ventilation and Exhaust: guestroom corridor ventilation	Refurbish existing ventilation system and provide proper make-up air with fire smoke damper at each level.
Ventilation and Exhaust: electrical room ventilation	Provide ventilation and cooling to existing and new electrical rooms.
Ventilation and Exhaust: elevator machine room ventilation	Provide permanent air conditioning unit with exterior vent through existing window opening.
Ventilation and Exhaust: Mechanical: hotel guest bathroom exhaust fans	Provide new toilet exhaust fans. Provide fire dampers or sub-ducts for every toilet room.
Ventilation and Exhaust: hotel public and 'back of house' exhaust fans	Provide new exhaust and make-up air to public restrooms, dormitory restrooms, and laundry linen rooms.
Fire detection, alarms, and suppression systems at cottages and dormitory	Extend new hotel fire sprinkler, detection, and fire alarm systems to cottages and employee dormitory.
<i>SEISMIC SAFETY RECOMMENDED PRACTICE AND STRUCTURAL STRENGTHENING</i>	
Brace Dining Room from Kitchen Side	Provide brace frame with minimally sized south Kitchen mezzanine with a deck that meets cleanable ceiling health code requirement over cooking areas, minimizes reconfiguration of north mezzanine Kitchen areas and accommodates employee accessibility needs.
Dining Room columns and granite veneer	Cap and interconnect columns at west side and pin stone veneer on columns throughout.

**Table 1.
Summary Description of the Selected Action**

Issue Evaluated	Alternative 3 (Selected Action)
<i>SEISMIC SAFETY RECOMMENDED PRACTICE AND STRUCTURAL STRENGTHENING (CONTINUED)</i>	
Dining Room	Brace Dining Room to central hotel tower with new east/west stringers
Dining Room / Solarium glazing	Install glazing at windows with panes larger than 16 square feet that meets seismic life-safety requirements without altering the original window frame profile.
Dining Room roof static load	Replace splice plate connections at trusses and incorporate new snowmelt/retention at roof.
Kitchen Floor slab	Remove temporary shoring and replace deteriorated sections of slab subject to failure and as needed for seismic upgrade; replace all flooring tiles.
Stone chimneys (hotel)	Provide internal core steel bracing with concrete ring in attic.
Stone chimneys (cottages)	Provide 2x blocking, clips, and straps in existing attic space.
Tall gypsum block walls in Great Lounge	Brace two-story gypsum block walls with internal steel frame.
Exterior granite veneer	Provide stainless steel pins for exterior granite veneer above egress paths only.
Seismic joint between Porte Cochere and entry canopy interface	Tie entry canopy and Porte Cochere together and stiffen using new connections to a new maintenance shed. Or create seismic slip joint / separation at Porte Cochere and entry walkway; do not raise Porte Cochere height.
Anchoring of major equipment	Brace mechanical, electrical and plumbing equipment and provide joints at utility lines.
<i>ACCESSIBILITY COMPLIANCE</i>	
Accessibility to hotel main front doors	Provide automatic door operators and thresholds in a historically acceptable manner.
Accessibility to other public ground floor exterior entrances	Provide reversible ramps and hardware at selected entrances.
Access to South Mezzanine meeting rooms	Provide limited use-limited access elevator in existing ground floor storage closet space and re-route Mezzanine stair.
Number of accessible guestrooms	Provide two additional accessible guestroom suites in the East Wing, one with an accessible balcony over Ahwahnee Bar kitchen.
Accessibility / equal facilitation to public restrooms	Expand men's restroom into administrative offices (no Gift Shop Storage). Expand women's restroom on north mezzanine to increase fixture count and maintain accessibility. Provide unisex accessible restroom on the ground floor adjacent to the men's restroom.
Accessibility at Front Desk / Concierge / Lobby	Replace non-compatible concierge counter with furnishing desk for accessible check-in and concierge. Provide accessible check-in at concierge.
Accessible parking and path of travel and wayfinding	Increase number of accessible spaces to seven and improve drainage/path of travel from parking to hotel entrance; provide new signage throughout designated accessible paths of travel.
Accessibility of employee facilities: egress, lockers, changing, breakroom, etc.	Accessible south Kitchen mezzanine will allow for new employee facilities above Kitchen.
Improve path of travel to major site features	Provide new accessible, historically compatible hardscape path over new utility corridor. Extend new accessible hardscape path to Wedding Lawn from Solarium terrace; provide new wayfinding signage.
<i>OPERATIONAL EFFICIENCY</i>	
Kitchen layout and efficiency	Reuse as much existing equipment as feasible in new efficient main Kitchen layout; maintain existing north Kitchen (e.g., refrigerators and mezzanine) as much as possible.
'Back of house' facilities	Provide locker room / employee breakroom on new partial south Kitchen mezzanine.
Banquet/chef offices	Provide limited-size offices.
Laundry facilities	Reorganize laundry facilities in their existing location.
Mechanical rooms	Retain mechanical rooms at their existing location.
Kitchen mezzanine elevator and stairs	Provide new egress stair to the ground floor.

**Table 1.
Summary Description of the Selected Action**

Issue Evaluated	Alternative 3 (Selected Action)
OPERATIONAL EFFICIENCY (CONTINUED)	
General manager, managers, and business office locations	Relocate hotel management office spaces to reconstructed Gift Shop mezzanine; provide new lift for accessibility.
Maintenance shed, bag storage / valet service station / bell station and maintenance storage and shops	Replace maintenance shed with new enclosure and expanded program space; retain and preserve historic Entry Walkway façade. Maintain service vehicle parking; provide new bag storage & valet/bell stations; provide new storage/shop for current functions plus service parking.
Gift Shop / retail storage	Provide new permanent storage for current Gift Shop needs.
Public toilets	Provide escorted-access-only unisex restroom.
Electrical: electrical systems at dormitory	Provide full upgrade of dormitory electrical systems.
Electrical: Main Point of Entry (MPOE) room for telecommunications	Provide new MPOE room and connections in dedicated room.
Mechanical: Mechanical, Electrical, and Plumbing (MEP) equipment in Kitchen	Re-use and relocate existing MEP equipment as much as possible. Upgrade as necessary in existing layout.
Mechanical: central MEP control system	Provide a microprocessor-based direct digital control system to monitor, control and optimize operation to all heating, ventilation, air conditioning, electrical and plumbing systems
Plumbing: domestic hot water piping grade	Replace valves, where feasible provide recirculating hot water at guestrooms, and replace all galvanized piping with Aquapex.
Plumbing: sanitary system	Replace deteriorated sanitary piping throughout
Basement waterproofing	Provide new waterproofing throughout basement.
HISTORIC REHABILITATION	
Hotel and cottage preservation and rehabilitation	Rehabilitate / stabilize features and finishes of hotel in 'poor' condition. Preserve and rehabilitate features and finishes in Very Significant and Significant spaces in 'fair' condition. Rehabilitation work associated directly with other actions affecting historic fabric or features in the hotel and cottages.
VISITOR EXPERIENCE AND VISITOR SERVICES	
Sweet Shop	Maintain existing Sweet Shop and repair finishes in place.
Ahwahnee Bar	Remove non-historic additions / finishes; replace with new compatible wood framed glass at north wall and remodel service areas with coordinated exit stair from second floor East Wing. Provide compatible multi-use storage addition along east wall.
Dining Room: east end	Remove non-historic service bar / reconstruct wine bar and space divider with free-standing furniture pieces.
Reception area	Optimize configuration.
Wine bar area / wine storage	Remove non-historic grill above service bar, rehab wainscot and wall surfaces, restore/replace two ceiling lights.
Lobby and guest arrival experience	Remove built-in concierge desk; provide removable accessible furniture for check-in and concierge near Sweet Shop.
Mechanical: Heating, ventilation and air conditioning capacity and ventilation to ground floor public spaces	Replace existing fan coil units. Maintain existing capacity.
Mechanical: hotel guestroom air conditioning systems	Replace air conditioning units with new 4-pipe fan coil units.
Mechanical: cottage guestroom: air conditioning systems	Replace w/ new 4-pipe fan coil units tied to the main building.
Passenger elevator	Rehabilitate non-historic cab interior and replace with design finishes and fixtures compatible with historic character. Replace hoistway components and equipment that cannot be refurbished.

**Table 1.
Summary Description of the Selected Action**

Issue Evaluated	Alternative 3 (Selected Action)
ENERGY EFFICIENCY AND SUSTAINABILITY	
Existing steam system	Perform a thorough inspection of the fuel oil/steam system and eliminate leaks.
Insulation at building envelope, systems and equipment: attic and roof spaces, exterior walls	Install rigid Insulation under roof and attach/adhere (waterproof) insulation to underside of slab at crawl space.
Insulation at refrigerator boxes	Add additional insulation at refrigerator boxes. Preserve historic freezer doors.
Provide new insulation at piping (domestic hot water/steam pipes)	Add pipe insulation at pipes in easy to access locations (i.e. crawlspace, riser shafts) and wherever piping is replaced.
Provide weather-stripping at existing wall accessories/ penetrations	Provide foam/sealant behind outlets, fixtures, pipe voids, etc.
Guestroom windows	Remove existing aluminum guestroom windows and replace with historically compatible wood-framed, double-paned insulated, low-e casement windows.
Ground floor windows	Carefully evaluate and replace caulking at windows and trims.
Ground floor doors	Rehabilitate doors where possible to close leaks. Replace with historically compatible door when necessary.
Mechanical: domestic hot water and space heating are tied into same boiler system	Replace heat exchanger tanks with new hot water storage tanks in same location.
Mechanical: space heating	Replace steam boilers with high-efficiency condensate steam boilers and close condensate loop.
Mechanical: chiller / cooling tower equipment is inefficient and not installed per manufacturer's recommendations	Replace existing chiller and cooling tower with high efficiency equipment and non-hydro chlorofluorocarbon refrigerant. Operate new chiller and cooling tower at higher water efficiency cycles.
Mechanical: guestroom air conditioning units	Replace with new smaller more efficient 4-pipe fan coil units.
Mechanical: public areas without cooling	Replace existing system. Do not provide additional air conditioning.
Electrical: transformers	Replace with new efficient transformers.
Electrical: 120/208-volt service equipment	Replace switchgear, distribution panels, and related transfer switches.
Electrical: separate 208V and 480V Services	Consolidate electrical services into one service at 480V.
Electrical: emergency power	Replace emergency generator in adjusted room layout and location.
Electrical: power backup system	Provide a transfer switch for emergency and legally required standby systems.
Electrical: light fixtures	Rehabilitate selected historic lighting fixtures that are seismically safe (seismically unsafe fixtures will be rehabilitated under separate project).
Electrical: lighting control system	Use light emitting diode (LED) technology for interior lighting to minimize electrical load and support light quality effort; provide LED site lighting.
Electrical: existing appliances and equipment	Replace existing obsolete equipment with Energy Star/EPA Watersense equipment.
Electrical: operational plug-load management	Establish a management practice to unplug/turn down guestroom mini-fridges when rooms are unoccupied.
Plumbing: public, guestroom, and employee toilets	Replace flush valves with low-flush model. Replace employee urinals with 0.125 gallon per minute (gpm) urinals. At guestroom toilets: replace valves where toilets can accommodate; replace toilets where current fixture is not already low-flow, as needed.
Plumbing: public, guestroom, and employee faucets	Provide low-flow (0.5-gpm) aerators at existing faucets.
Plumbing: guestroom and employee showerheads	Replace showerheads with low-flow fixtures (1.5-2.0 gpm).
Plumbing: kitchen fixtures	Provide water efficient sprayers. Replace existing dishwasher with high water-efficiency dishwasher.
Plumbing: heat recovery for domestic hot water system	Recover heat from dishwasher discharge pipes to supplement domestic hot water.
Plumbing: water conservation at heating systems	Close heating condensate loop. Eliminate once-through cooling in refrigerators.
Plumbing: sanitary system	Replace existing piping with new PVC piping throughout.

Other Alternatives Considered and Analyzed

No Action Alternative

The No Action Alternative is required by the National Environmental Policy Act and NPS *Director's Order 12: Conservation Planning, Environmental Impact Analysis and Decision-making* to provide the baseline against which to compare the other alternatives. This alternative assumes that existing conditions at The Ahwahnee will continue, including routine maintenance and repairs. Actions to address code compliance, protect resources, or enhance operations and visitor experience are included in the action alternatives, but are not considered part of the No Action Alternative for the purposes of the environmental assessment.

Alternative 1

Alternative 1 meets the fundamental objectives of the comprehensive rehabilitation program with minimally invasive measures. This alternative relies on code waivers and operational management wherever possible to meet project goals. Alternative 1 maintains current program spaces to the extent practicable, for both operational efficiency and to improve visitor experience, while meeting minimum safety code requirements.

Alternative 1 also proposes historic rehabilitation of historic fabric and features throughout the hotel and cottages that are rated in *The Ahwahnee Historic Structures Report* (ARG 2011) as being in “poor” condition, and historic fabric and features rated as being in “fair” condition in the “significant” and “very significant” spaces. The energy efficiency elements of this alternative implement measures that affect the building and historic fabric only where other work is occurring or where there would be no impact on the historic resource.

Alternative 2

Alternative 2 addresses fire and life-safety, seismic, structural, and accessibility code and standard deficiencies using more substantive and/or invasive actions to achieve code compliance, and exceeds the basic seismic safety requirements for federal buildings while providing a higher degree of historic rehabilitation and operational improvement than Alternative 1. Alternative 2 also reorganizes areas already affected by proposed actions to facilitate and improve operational practices. The visitor experience is substantially improved with designs that are compatible with the historic character of the spaces affected.

Like Alternative 1, Alternative 2 proposes historic rehabilitation of features throughout the hotel and cottages that are rated in *The Ahwahnee Historic Structures Report* (ARG 2011) as being in “poor” condition and includes rehabilitation and preservation of historic fabric and features in “fair” condition in spaces that are considered historically “significant” and “very significant.” In addition, Alternative 2 includes implementation of non-maintenance treatment recommendations from *The Ahwahnee Historic Structures Report* (ARG 2011) in “contributing” and “historic utilitarian” spaces.

An additional goal of Alternative 2 is to improve energy and water-use efficiency by using measures that have minimal impacts on the building and site.

Actions Considered but Dismissed

Install Micro Piles and Grade Beams or Provide Base Isolation of the Hotel Structure

Actions involving the installation of a new foundation system would offer greater protection to the structure in a 2,500-year seismic event. However, these seismic protection benefits would result in prohibitive project costs and undesirable impacts to historic fabric and archeological resources.

Install a Full Mezzanine Structure in the Kitchen

During the alternatives development process, alternatives calling for a full mezzanine or a mezzanine with only a small side-oriented well open to the space below were rejected because they largely obscured the perception of the historic, character-defining two-story Kitchen volume. The National Park Service conferred with structural engineers developing the seismic stabilization actions to ensure that an alternative representing the smallest possible brace-frame and diaphragm (mezzanine) structure needed to stabilize the adjacent Dining Room was considered. As a result, the design alternative represented by Alternative 1 and chosen as the Selected Action (Alternative 3) preserves an open area of two-story volume between the existing north mezzanine and the new brace-frame mezzanine to be constructed on the south side of the Kitchen.

Maintaining Public Use of the South Mezzanine Meeting Rooms without Adding Additional Means of Egress

The National Park Service considered meeting fire code at the South Mezzanine by limiting public total occupancy of the meeting rooms and without adding an additional means of egress. However, the result of rigorous code analysis by the park Fire Marshal/Authority Having Jurisdiction in conjunction with the Value Analysis process conducted in 2010 determined that limiting public use does not represent a code-compliant alternative. The results of this analysis indicated that the South Mezzanine does not meet the code definition of a full mezzanine, and egress distances to the foot of the existing interior stair from all points in the meeting rooms do not allow for continued use of the space for public assembly use unless a second, code-compliant means of egress is provided.

Address Fire Separation between Dining Room and Hotel by Installing Sprinklers

Through a code review and the preliminary alternatives design process, the National Park Service found that the option to sprinkler the Dining Room in lieu of providing fire separation will not meet fire code requirements, and that the only option to comply with fire code would be to install fire separation doors, as proposed in the Selected Action. The overhead fire separation doors proposed would be completely concealed in non-original ceilings at the Diggins Suite and Dining Room.

Install Lightning Protection

The physical location of The Ahwahnee limits the risk associated with lightning. Installation of lightning protection would also result in unnecessary visible impacts on the very significant exterior of the National Historic Landmark.

Preserve, Rehabilitate, or Remove Landscape Features

Actions affecting landscape features, including the reflecting pond, parking lot, and tennis courts, have been deferred, pending the guidance of the upcoming Merced Wild and Scenic River Comprehensive

Management Plan on the amounts and types of visitor use appropriate in the wild and scenic river corridor.

Reuse of Existing Hotel Utility Systems

Reuse of existing hotel utility systems was carefully evaluated and elements were proposed for re-use in the action alternatives when feasible. However, some systems are or will soon be beyond their operational/design life. The existing steam boilers and distribution system are very old and inefficient, many air handling units are in need of replacement, replacement parts are no longer available for fan coil units in guestrooms, the existing chiller and cooling tower use outdated refrigerants, and the existing HVAC systems in the cottages are temporary. These utility systems could not be re-used, and new replacement systems are included in the Selected Action.

Alternative Options Considered but Dismissed

In addition to the Actions Considered but Dismissed listed above, the options listed in Table 2 were also considered during the planning process for actions that remain in the comprehensive rehabilitation plan.

Table 2. Alternative Options Considered but Dismissed for the Comprehensive Rehabilitation Plan	
Option Considered	Reason Dismissed
<i>SEISMIC SAFETY RECOMMENDED PRACTICE AND STRUCTURAL STRENGTHENING</i>	
Add shear walls and frames in the Dining Room	The visual impacts on this Very Significant area of the hotel are unacceptable.
<i>FIRE LIFE-SAFETY</i>	
Various emergency egress routes (e.g., interior vs. exterior, width, separation distance between routes)	Impacts on historic fabric and features were considered for each egress option. Fire code requirements drove actions; however those proposals that caused unacceptable impacts on historic fabric or did not meet code requirements were removed from consideration.
Provide localized waterproofing solutions to address water intrusion in the basement and below grade utility rooms (e.g., small repairs and patching to existing waterproofing)	Minimal repairs would not be sufficient to resolve the infiltration of water and code compliance concerns.
Replace of all the cloth-wrapped wiring throughout the building	Current conditions are acceptable with the California Historic Building Code; replacement of all wire was not a reasonable option due to impacts on historic fabric.
<i>ACCESSIBILITY COMPLIANCE</i>	
Reconfiguring the existing Front Desk to meet accessibility requirements	The existing reception desk is not large enough to accommodate a redesigned accessible registration counter.
<i>OPERATIONAL EFFICIENCY</i>	
Maintain existing pneumatic system for control of HVAC and manually controlled lighting	Upgrades to MEP systems in Yosemite Valley are connected to a central system for improved tracking and maintenance.
Reconfigure the Sweet Shop	Reconfiguration was not a reasonable option given impacts on historic fabric/configuration of a Significant space of the hotel.
<i>ENERGY EFFICIENCY AND SUSTAINABILITY</i>	
Install trickle vents to replicate original ventilation in the guestrooms	Current fire code restrictions do not allow the use of these systems, and they are incompatible with the historic character of the guestrooms.
Replace the large paned glass in the Dining Room and Solarium with double-glazed windows	The impact on historic fabric was too great with the number of proposed window retrofits.
Alternative energy sources (e.g., compressed natural gas or propane fuel cell, photovoltaic power, using Royal Arch Creek as an alternative energy source)	Seasonal climate changes, scenic viewshed, and wild and scenic river considerations, and the remote location of the park make these choices infeasible.

Environmentally Preferable Alternative

The Council on Environmental Quality (CEQ) regulations implementing the National Environmental Policy Act (NEPA) and NPS NEPA guidelines require that “the alternative or alternatives which were considered to be environmentally preferable” be identified (CEQ Regulations, section 1505.2).

“Environmentally preferable” is defined as “the alternative that will promote the national environmental policy as expressed in NEPA’s section 101. Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative that best protects, preserves, and enhances historic, cultural, and natural resources” (CEQ 1981).

Section 101 of NEPA states that:

It is the continuing responsibility of the Federal Government to . . . (1) fulfill the responsibilities of each generation as trustee of the environment for succeeding generations; (2) assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings; (3) attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences; (4) preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choice; (5) achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life’s amenities; and (6) enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

Conformance: Under the No Action Alternative, further historic rehabilitation and stabilization would not occur. Therefore this alternative would not best protect, preserve, or enhance cultural resources, nor would it provide for the safety and code improvements proposed under the action alternatives.

Alternatives 1, 2, and 3 would all meet the above criteria, as they would each provide substantive compliance with current codes and standards, provide historic rehabilitation work that is needed to maintain and protect the historic integrity of The Ahwahnee, and provide increased operational and energy efficiencies. Alternative 1 would best meet criterion (4), as it proposes the minimal scheme to address code compliance issues, relying on code waivers and management options to the maximum extent possible, and adopts the least invasive means of meeting project objectives. Alternative 2 would best meet criterion (6) as it provides the most substantive code compliance with the highest degree of energy and water use efficiencies. However, Alternative 3, the Selected Action, would best meet criteria (1), (2), (3), and (5) because it incorporates many of the increased efficiencies and much of the substantive code compliance of Alternative 2 with minimally invasive options of Alternative 1.

In conclusion, upon full consideration of the elements of section 101 of NEPA, the Selected Action (Alternative 3, as analyzed in the environmental assessment) represents the environmentally preferable alternative for the comprehensive rehabilitation of The Ahwahnee hotel and related structures. The Selected Action provides the maximum feasible protection and preservation of the historic property while meeting plan objectives for public and employee safety, operational and energy efficiency, and visitor experience.

Why the Selected Action Will Not Have a Significant Effect on the Human Environment

In considering the ten criteria for significant impact as defined by CEQ regulations 40 CFR 1508.27, it was determined that the Selected Action will not have a significant effect. All criteria were considered, and it was determined that none of the significance criteria are triggered under the Selected Action. Specifically, no highly uncertain or controversial impacts, unique or unknown risks, elements of precedence, or cumulatively significant effects have been identified; implementation of the Selected Action will not result in the loss or destruction of significant scientific, cultural, or historic resources; and, implementation of the Selected Action will not violate any federal, state, or local laws.

Creating a comprehensive rehabilitation program to address numerous code deficiencies at the hotel, outdated equipment, and conditions that may impact the historic integrity of the site will not significantly determine future actions at The Ahwahnee. The adverse effect on the historic property resulting from code-required actions will be resolved through implementation of measures specified in a programmatic agreement (attached as Appendix A to the environmental assessment) between the National Park Service and the State Historic Preservation Officer, and are therefore not determined to be significant.

Based on the following summary of effects, and as discussed in the environmental assessment, the Selected Action (Alternative 3, as analyzed in the environmental assessment) is determined not to have a significant effect on the human environment.

Geohazards

Generally, the hotel and cottages conform to seismic standards for collapse prevention under a 2,500-year seismic event. Seismic safety improvements in the Selected Action will meet the RP6 life-safety performance standards for the 500-year earthquake and the 2,500-year earthquake. These actions will substantially decrease the threat to life and property at The Ahwahnee from seismic events.

Soils

There will be a beneficial impact on soils from the consolidation of underground utilities and the removal of a hardened earth, low-water crossing at the unnamed seasonal tributary east of The Ahwahnee cottages.

Construction activities will occur in areas where soils have been previously disturbed. The actions necessary to meet fire and life-safety, seismic, and accessibility codes and standards will disturb approximately 0.75 acre of soils classified as ‘resilient’ (soils that are capable of withstanding alteration and heavier use without permanent deformation, or that recover more easily from alteration and disturbance) and 0.67 acre of soils classified as ‘other’ (soils that are not considered highly valued or resilient, are not likely to support vegetation that is rare or notably diverse, and are abundant). Construction impacts on soils will be mitigated by ongoing implementation of best management practices to minimize spills, soil compaction, and erosion.

Hydrology and Water Quality

There will be a long-term, beneficial impact on the unnamed seasonal tributary east of The Ahwahnee cottages from removal of a low-water vehicle crossing. In addition, improvement of site drainage at the

hotel basement and back dock will have a beneficial impact on hydrology by redirecting drainage toward Ahwahnee Meadow.

Mitigation measures and best management practices (see Mitigation, below) will reduce the potential for impacts of excavation and construction activities on seasonal tributaries, such as disruption of surface flow, potential soil erosion, and accidental releases of hazardous substances from construction equipment. These measures include scheduling construction activity during seasonal periods of low or no surface water flow, minimizing disturbance areas, salvaging excavated materials, restoring contours of stream banks, and implementing construction best management practices.

Excavation beneath the hotel and the installation of a utility corridor will likely require dewatering activities, which will potentially impact the adjacent meadow and Royal Arch Creek. Mitigation measures and best management practices (see Mitigation, below) will be implemented during construction activities to ensure that dewatering will not increase sediment loading at drainages or otherwise adversely impact the adjacent meadow.

Vegetation

Native vegetation in the project area is already disturbed from the construction of the hotel and associated facilities as well as ongoing landscaping activities. The removal of select native trees to meet fire code requirements along fire access roads and the hardening of select pathways to meet accessibility requirements will result in very localized, minor, adverse impacts on the size and continuity of native vegetation. With implementation of mitigation measures and best management practices (see Mitigation, below) the Selected Action will not further disrupt the continuity or integrity of native vegetation.

Wildlife

Habitat in the project area is already disturbed from previous alterations to native vegetation, construction of facilities, and routine hotel operations. There will be a local, long-term, minor, adverse impact on upland habitat from removal of select trees and some road widening for fire access road improvements. Implementation of mitigation measures and best management practices (see Mitigation, below) with a focus upon avoidance, limiting construction activities during breeding seasons, and conducting surveys immediately before construction, will minimize temporary impacts on wildlife habitat and populations during construction activities.

Special-Status Species

Construction will occur in suitable habitat for a number of special-status bird and bat species, but implementation of mitigation measures and best management practices (see Mitigation, below) with a focus upon avoidance, limiting construction activities during breeding seasons, and limiting areas of impacts will reduce potential adverse impacts. Overall, the Selected Action will result in localized, short-term, minor, adverse impacts on special-status species. Therefore, the Selected Action may affect, but is not likely to adversely affect, special-status species.

Air Quality

Efficiency upgrades throughout the hotel and cottages for equipment and materials will result in a long-term, minor, beneficial impact on indoor, local, and regional air quality. Construction activities will result in

a short-term, minor, adverse impact on local air quality due to construction-related dust, equipment, and vehicle emissions.

Soundscapes

Because actions will not result in changes to levels of visitation at the park, a substantial change in the number of accommodations, or changes to the basic operations or employee staffing of the hotel, there will be no long-term impact on soundscapes resulting from implementation of any of the action alternatives. Impacts on soundscapes under will be limited to short-term impacts from construction activities. Impacts will be minimized to the extent feasible by scheduling construction during periods of low occupancy, low visitation, or during a hotel closure. In addition, wildlife may be impacted by noise generated during construction. Impacts on wildlife will be mitigated by scheduling construction activities outside of breeding seasons (see Mitigation, below).

Visitor Experience and Services

Fire/life-safety and seismic improvements will result in long-term beneficial impacts on visitor safety at The Ahwahnee. The loss of two standard guestrooms will slightly affect room availability. Accessibility improvements, rehabilitation of historic features, increased restroom fixture counts, and improved heating and cooling systems will enhance the visitor experience at the facility. The remodeled Ahwahnee Bar will improve visitor service through operational upgrades behind the bar. The addition of wood-framed glass at the north wall of the Bar will enhance the sense of arrival at the main entrance to the hotel. Overall, the Selected Action will result in a long-term, moderate, beneficial impact on visitor experience, services, and safety.

Facility Operations and Infrastructure

The Selected Action will address operational issues throughout the building, including upgrades or replacement of critical mechanical, electrical, and plumbing systems; providing code-compliant and operationally efficient layouts of the Kitchen and Ahwahnee Bar; establishing a new main point of entry for telecommunication systems; and providing an enlarged maintenance shed to increase storage capacity and improve bellhop storage. The Selected Action will provide an additional restroom, provide a limited use/limited access elevator to the South Mezzanine, and provide an accessible work and break areas for employees. Overall, this will result in a long-term, moderate, beneficial impact on operations, maintenance requirements, and facility infrastructure at The Ahwahnee.

Socioeconomics

Visitor populations are not likely to be impacted, and visitor spending displaced from lodging or other services at The Ahwahnee is likely to be captured at other establishments in the region. Therefore, the impact on visitor spending in both the local and regional economy will be negligible. Concessioner and park revenues will be reduced to some extent during construction closures of various facilities and services. The impacts on concessioner and park revenues will be negligible to moderate, depending on construction phasing. Short-term decreases in concessioner employment and/or wages will likely be more than offset by the short-term increases in construction employment and wages, resulting in a short-term, beneficial impact on the local and regional economies. Impacts on Mariposa County could be minor to major and adverse in the short term, depending on the extent of guestroom closures (number of guestrooms and duration) over the anticipated 20-year implementation period. Long-term impacts on Mariposa County Transient Occupancy Taxes revenues will be negligible and adverse with the permanent

loss of two standard guestrooms (the loss will be offset by the conversion of four standard rooms to two accessible guestroom suites).

Energy Consumption and Global Climate Change

Design techniques and the application of new technologies to reduce energy and water consumption are incorporated into the comprehensive rehabilitation plan. Facility upgrades will reduce the overall use of energy by replacing inefficient windows, upgrading plumbing throughout the facility with low-flow fixtures, adding insulation, and completely replacing outdated heating and cooling systems with high-efficiency units to optimize operation of all heating, ventilation, and air conditioning systems, and reduce energy and water consumption.

The Selected Action will use high-efficiency, oil-fired boilers for steam heating. Kitchen equipment will be refurbished and reused whenever possible. Short-term increases in fuel and emissions will occur during construction. Overall, improved efficiency and reduced energy use will result in a local, long-term, minor to moderate, beneficial impact on overall energy consumption and resulting emissions at The Ahwahnee hotel, and a regional, long-term, negligible, beneficial impact on energy consumption and climate change.

Historic Sites, Buildings, and Cultural Landscapes

Although the majority of work under the Selected Action will not impact the characteristics that make The Ahwahnee eligible for inclusion on the National Register of Historic Places, or diminish its integrity, as a whole the Selected Action will result in an adverse effect on the historic property.

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) (attached to the environmental assessment as Appendix A) will be implemented to resolve the adverse effect. In addition, NPS historical architects and the park historic preservation officer will continue to work with project design teams and the State Historic Preservation Officer to minimize impact on the historic property during and final design, construction planning and implementation.

Archeological Resources

Actions that will cause ground disturbance, including improvements to fire department access, seismic strengthening, accessibility, operational efficiency, and site drainage, will have the potential to result in an adverse effect on two documented archeological sites, as well as the Yosemite Valley Archeological District.

Potential adverse effects will be resolved through adherence to NPS cultural resource management guidelines and implementation of the 2011 Programmatic Agreement, which stipulates application of the *Archeological Synthesis and Research Design* (Hull and Moratto 1999). In addition, an NPS archeologist and the park historic preservation officer will be consulted throughout project design and construction planning and implementation.

American Indian Traditional Cultural Resources

The project area contains resources of prehistoric, historic, and contemporary significance to American Indian tribes and groups. Traditional cultural resources of value to American Indians might be affected by construction, removal of select native vegetation, and alteration of archeological constituents. Ongoing

consultation and cultural monitoring, as provided for in the 2011 Programmatic Agreement for implementation of actions covered in this planning effort, will identify the potential for additional impacts and address mitigation of their effects.

In accordance with the 2011 Programmatic Agreement, American Indian representatives from culturally associated tribes and groups will be provided an opportunity to participate in activities, including archeological investigations and construction monitoring, for the protection of resources to which they attach cultural, spiritual, and traditional significance that might be affected by project implementation.

Cumulative Impacts

CEQ regulations (section 1508.7) describe a cumulative impact as follows:

...a "Cumulative impact" is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

The analysis of cumulative impacts in *The Ahwahnee Comprehensive Rehabilitation Plan Environmental Assessment* did not identify any significant cumulative impacts. Past actions, including the construction of and subsequent modifications to the original hotel and associated facilities, have had long-term adverse impacts on natural resources in the area. Recently completed, present, and reasonably foreseeable future actions may reverse adverse impacts on these resources to some degree, but in most cases a cumulative adverse impact remains.

Therefore, the impacts of the Selected Action, when considered in conjunction with past, present, and foreseeable future actions, will ultimately result in a negligible to minor adverse cumulative impact for the natural resources analyzed in the environmental assessment. Most socio-cultural resources, such as visitor experience and recreation, will see a cumulative beneficial effect due to the improvements related to public safety, energy efficiency, operations, and visitor services.

There will be an adverse effect on the National Historic Landmark under the Selected Action, as defined by 36 CFR 800 for implementing section 106 of the National Historic Preservation Act, as amended (16 United States Code (USC) 470f). However, the adverse effect will be resolved with implementation of the project-specific programmatic agreement between the National Park Service and the State Historic Preservation Officer.

Mitigation

The mitigation measures and best management practices presented in Table 3 have been incorporated into the Selected Action to avoid or reduce adverse impacts on park resources.

Table 3.
Mitigation Measures and Best Management Practices Incorporated into the Selected Action

Mitigation Measures and Best Management Practices	Responsibility	Critical Milestones
<i>CONSTRUCTION</i>		
Prior to entry into the park, steam-clean heavy equipment to prevent importation of non-native plant species, tighten hydraulic fittings, ensure hydraulic hoses are in good condition and replace if damaged, and repair all petroleum leaks.	Yosemite National Park, Project Manager; Contractor	Prior to and concurrent with project activities
Inspect the project to ensure that impacts stay within the parameters of the project area and do not escalate beyond the scope of the environmental assessment, as well as to ensure that the project conforms with all applicable permits or project conditions. Store all construction equipment within the delineated work limits. Confine work areas within creek channels to the smallest area necessary.	Yosemite National Park, Project Manager; Contractor	Prior to and concurrent with project activities
Implement compliance monitoring to ensure that the project remains within the parameters of National Environmental Policy Act (NEPA) and National Historic Preservation Act (NHPA) compliance documents.	Yosemite National Park, Project Manager; Contractor	Concurrent with project activities
Consult with the park's Environmental Planning and Compliance Office to ensure that site design (e.g., landscape components) within the Merced Wild and Scenic River corridor is consistent with the Merced Wild and Scenic River Comprehensive Management Plan.	Yosemite National Park, Project Manager	Prior to project activities
Provide a project orientation for all construction workers to increase their understanding and sensitivity to the challenges of the special environment in which they will be working.	Yosemite National Park, Project Manager	Prior to and concurrent with project activities
If deemed necessary, demolition/construction work on weekends or federal government holidays may be authorized, with prior written approval of the Superintendent.	Yosemite National Park, Project Manager	Prior to and concurrent with project activities
Remove all tools, equipment, barricades, signs, surplus materials, and rubbish from the project work limits upon project completion. Repair any asphalt surfaces that are damaged due to work on the project to original condition. Remove all debris from the project site, including all visible concrete, timber, and metal pieces.	Yosemite National Park, Project Manager; Contractor	Upon completion of project activities
The Construction Contractor shall prepare a Health and Safety Plan to address all aspects of Contractor health and safety issues compliant with OSHA standards and other relevant regulations. The Plan shall be submitted for park review and approval prior to construction.	Contractor	Prior to and concurrent with project activities
<p>A Storm Water Pollution Prevention Plan (SWPPP) will be prepared by the Construction Contractor and implemented for construction activities on The Ahwahnee grounds to control surface run-off, reduce erosion, and prevent sedimentation from entering water bodies during construction. The SWPPP will be submitted for park review and approval prior to construction. The plan will include measures such as:</p> <ul style="list-style-type: none"> Take measures to control erosion, sedimentation, and compaction, and thereby reduce water pollution and adverse water quality effects. Use silt fences, sedimentation basins, etc. in construction areas to reduce erosion, surface scouring, and discharge to water bodies To the extent possible, schedule the use of mechanical equipment during periods of low precipitation to reduce risk of accidental hydrocarbon leaks or spills. When mechanical equipment is necessary outside of low precipitation periods, use NPS– approved methods to protect soil and water from contaminants Dispose of volatile wastes and oils in approved containers for removal from construction sites to avoid contamination of soils, and drainages. Inspect equipment for hydraulic and oil leaks prior to use on construction sites, and implement inspection schedules to prevent contamination of soil and water. Keep absorbent pads, booms, and other materials on site during projects that use heavy equipment to contain oil, hydraulic fluid, solvents, and hazardous material spills 	Contractor	Prior to and concurrent with project activities

Table 3.
Mitigation Measures and Best Management Practices Incorporated into the Selected Action

Mitigation Measures and Best Management Practices	Responsibility	Critical Milestones
CONSTRUCTION (CONTINUED)		
Construction Contractor will develop and implement a comprehensive Spill Prevention/Response Plan that complies with federal and state regulations and addresses all aspects of spill prevention, notification, emergency spill response strategies for spills occurring on land and water, reporting requirements, monitoring requirements, personnel responsibilities, response equipment type and location, and drills and training requirements. The spill prevention/response plan will be submitted to the park for review/approval prior to commencement of construction activities.	Contractor	Prior to project activities
A construction work schedule shall be prepared by the Construction Contractor for the project that minimizes effects on wildlife in adjacent habitats and peaks in visitation. The work schedule will be submitted for park review and approval prior to construction.	Yosemite National Park, Project Manager, Contractor	Prior to and concurrent with project activities
Supervisory construction personnel will attend an Environmental Protection briefing provided by the park prior to working on site. This briefing is designed to familiarize workers with statutory and contractual environmental requirements and the recognition of and protection measures for archeological sites, sensitive habitats, water resources, and wildlife habitats.	Contractor	Prior to and concurrent with project activities
The park will develop a Communications Strategy Plan to alert necessary park and concessioner employees, residents and visitors to pertinent elements of the construction work schedule.	Yosemite National Park, Project Manager	Prior to and concurrent with project activities
Identify locations of existing utilities prior to removal activity to prevent damage to utilities. The NPS maintenance staff will be informed 10 working days prior to any ground disturbance. The Underground Services Alert will be informed 72 hours prior to any ground disturbance. Construction-related activities will not proceed until the process of locating existing utilities is completed (water, wastewater, electric, communications, and telephone lines). An emergency response plan will be required of the contractor.	Yosemite National Park, Project Manager	Prior to and concurrent with project activities
Promptly reconnect utility services that are interrupted because of construction activities, and provide advance notification if utility service will be disrupted.	Yosemite National Park, Project Manager; Contractor	Concurrent with and following project activities
Provide proper and timely maintenance for vehicles and equipment used during construction to reduce the potential for mechanical breakdowns.	Yosemite National Park, Project Manager; Contractor	Prior to and concurrent with project activities
HYDROLOGY AND WATER QUALITY		
All disturbed soil and fill slopes will be stabilized in an appropriate manner.	Contractor	Prior to and concurrent with project activities
Store equipment and materials away from all waterways.	Yosemite National Park, Project Manager; Contractor	Concurrent with project activities
Wastewater contaminated with silt, grout, or other by-products from construction activities will be contained in a holding or settling tank to prevent contaminated material from entering watercourses or wetlands.	Contractor	Concurrent with project activities

Table 3.
Mitigation Measures and Best Management Practices Incorporated into the Selected Action

Mitigation Measures and Best Management Practices	Responsibility	Critical Milestones
HYDROLOGY AND WATER QUALITY (CONTINUED)		
<p>Waters will be free of changes in turbidity that cause a nuisance or adversely affect beneficial uses. Increases in turbidity attributable to controllable water quality factors will not exceed the following limits, as described in <i>The Water Quality Control Plan</i> for the Central Valley Regional Water Quality Control Board (CVRWQCB 2009). In determining compliance with the limits below, appropriate averaging periods may be applied, provided that beneficial uses will be fully protected</p> <ul style="list-style-type: none"> Where natural turbidity is between 0 and 5 Nephelometric Turbidity Units (NTUs), increases will not exceed 1 NTU. Where natural turbidity is between 5 and 50 NTUs, increases will not exceed 20%. Where natural turbidity is between 50 and 100 NTUs, increases will not exceed 10 NTUs. Where natural turbidity is greater than 100 NTUs, increases will not exceed 10%. 	Contractor	Prior to and concurrent with project activities
Remove hazardous waste materials generated during implementation of the project from the project site immediately.	Contractor	Concurrent with project activities
Incorporate trench plugs or similar into new and abandoned utility corridors through wetland areas where required to prevent formation or continuation of groundwater conduits.	Yosemite National Park; Project Manager; Contractor	Concurrent with project activities
Surface drainage facilities will be designed to transport runoff in a non-erosive manner.	Yosemite National Park; Project Manager; Contractor	Prior to and concurrent with project activities
Material from construction work will be collected by the contractor and covered, and will not be deposited where it could be eroded and carried to the stream by surface runoff or high stream flows.	Contractor	Concurrent with project activities
Schedule construction activities at drainages for seasonal periods of low or no water. On the unnamed seasonal tributary, place bridge abutments above the ordinary high water mark.	Contractor	Prior to and concurrent with project activities
Minimize disturbance area at the banks of drainages. Salvage excavated materials for replacement after construction. The banks of drainages will be restored to their pre-existing contours.	Contractor	Concurrent with project activities
At utility corridors, all trench backfill should be properly placed and adequately compacted to provide a stable subgrade.	Contractor	Concurrent with project activities
At utility corridors, adequate drainage should be provided to prevent surface water or subsurface seepage from saturating the subgrade utility corridor.	Contractor	Concurrent with project activities
VEGETATION (INCLUDING SPECIAL-STATUS PLANTS)		
Contractor will develop a Revegetation Plan in conjunction with the park's Resources Management and Science Division, to be approved prior to construction activities.	Yosemite National Park, Project Manager; Contractor	Prior to project activities
Avoid fastening ropes, cables, lighting, or fences to trees.	Yosemite National Park, Project Manager; Contractor	Prior to and concurrent with project activities
A park botanist will oversee placement of construction fencing to avoid impacts on sensitive plants and wetlands. Although no special-status plant species are currently known to occur in the proposed construction areas, if special-status plant species are identified within the construction disturbance zone, the park project manager will work with the park botanist to avoid impacts.	Yosemite National Park, Project Manager; Contractor	Prior to and concurrent with project activities

Table 3.
Mitigation Measures and Best Management Practices Incorporated into the Selected Action

Mitigation Measures and Best Management Practices	Responsibility	Critical Milestones
WILDLIFE (INCLUDING SPECIAL-STATUS WILDLIFE)		
Provide information to the contractor regarding wildlife concerns at the project briefings, and provide contractor specifications and Best Management Practices to avoid activities that are destructive to wildlife and habitats. Project Manager will consult with the park biologist to schedule construction activities with seasonal consideration of wildlife lifecycles to minimize impacts during sensitive periods (e.g., after bird nesting seasons, when bats are neither hibernating nor have young, etc).	Yosemite National Park, Project Manager	Concurrent with and following project activities
Incorporate wildlife exclusion measures during design development for pathway, roadway, and improvements at the hotel terrace in consultation with the park biologist.	Yosemite National Park, Project Manager; Contractor	Prior to and concurrent with project activities
Limit the effects of light and noise on adjacent habitat through controls on construction equipment. No outdoor construction activities are to occur between dusk and dawn to eliminate the need for outdoor construction lighting, and to avoid disruption of mating, nesting, or foraging owls.	Yosemite National Park, Project Manager; Contractor	Prior to and concurrent with project activities
Prior to tree trimming or removal, a park wildlife biologist will first survey (within 4 days prior to any such work) to determine whether there are any nests present, and advise as to whether the activity must be delayed to ensure that sensitive species such as nesting migratory birds are protected and not disrupted.	Yosemite National Park, Project Manager working with the park wildlife biologist	Prior to project construction activities
Tree removal resulting from improvements to the fire department access road to the cottages will occur outside of the nesting season (after August and before April) in order to avoid impacts on special-status bird species.	Yosemite National Park, Project Manager working with the park wildlife biologist	Concurrent with project activities
Beginning in early spring, a park wildlife biologist will conduct bird surveys and review current owl reports to determine whether special status species are present and may be mating, nesting, or foraging in the project vicinity.	Yosemite National Park, Project Manager	Prior to project construction activities
If nesting birds are observed (e.g., discovered by workers) that are not special status species, the project manager will notify the park wildlife biologist who will recommend steps to avoid undesirable impacts to the nest or young.	Yosemite National Park, Project Manager	Prior to project construction activities
A park biologist will conduct bat surveys in the vicinity of the hotel in early summer (May-July for maternity colonies) and in fall (August-November) to locate potentially roosting/hibernating bats, and will provide specific directions for avoiding their disturbance if they are found. If bats are detected, the specific area will be protected and work on that particular area will be delayed until the bats vacate or can be excluded from the area in a manner that does not adversely affect their survival or that of their young.	Yosemite National Park, Contractor	Prior to project activities
If bats are detected during reproduction or hibernation periods, disturbance of potential habitat will be delayed until the bats can be excluded from the area in a manner that does not adversely affect their survival or that of their young.	Yosemite National Park, Project Manager, Contractor	Concurrent with project activities
If surveys conducted immediately prior to construction do not reveal any bat species present within the project area, then the action will begin within three days to prevent the destruction of any bats that could move into the area after the survey.	Yosemite National Park, Project Manager	Prior to and concurrent with project activities
FEDERAL AND STATE PERMIT REQUIREMENTS		
The NPS will apply for and comply with all federal and state permits required for construction-related activities, including the California Regional Water Quality Control Board and the U.S. Army Corps of Engineers. Per consultation with the U.S. Army Corps of Engineers, the NPS will conduct a wetlands delineation prior to construction.	Yosemite National Park, Project Manager	Prior to project activities

**Table 3.
Mitigation Measures and Best Management Practices Incorporated into the Selected Action**

Mitigation Measures and Best Management Practices	Responsibility	Critical Milestones
AMERICAN INDIAN TRADITIONAL CULTURAL RESOURCES AND PRACTICES		
For the fire department access road improvements, a traditional cultural resource mitigation plan will be developed in consultation with the park's vegetation subject-matter experts and input from tribal consultation and monitoring.	Yosemite National Park, Project Manager, Contractor	Prior to and concurrent with project activities
Culturally associated tribes and groups will be given notice prior to ground disturbing activities at the project site and may be present at the project site to monitor ground disturbance during construction, as stipulated in the <i>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</i> (2011 Programmatic Agreement).	Yosemite National Park, Project Manager	Prior to and concurrent with project activities
Continue to consult with culturally associated American Indian tribes and groups throughout the project to avoid or mitigate damage to American Indian traditional resources, as stipulated in the 2011 Programmatic Agreement.	Yosemite National Park, Project Manager	Prior to, concurrent with and following project activities
HISTORIC PROPERTIES		
The Park will adhere to the 2011 Programmatic Agreement to resolve adverse effects on historic properties, including historic buildings and features, and archeological resources.	Yosemite National Park, Project Manager	Prior to and concurrent with project activities
Mitigation measures to resolve adverse effects, as defined in the 2011 Programmatic Agreement, include documentation, interpretation, reevaluation of National Register status (updating National Register Nomination form), construction monitoring, and archeological testing and data collection.	Yosemite National Park, Project Manager	Prior to and concurrent with project activities
DUST ABATEMENT MEASURES		
Cover and/or seal truck beds and soil stockpiles to minimize blowing dust or loss of debris.	Contractor	Concurrent to project activities
Limit truck and related construction equipment speeds in active construction areas to a maximum of 15 miles per hour and strictly adhere to park regulations and posted speed limits in other areas while inside park boundaries.	Contractor	Concurrent to project activities
Maintain adequate dust suppression equipment and use clean water to control excess airborne particulates at staging areas, active construction zones, and unpaved roads leading to/from active construction areas.	Contractor	Concurrent with project activities
EMERGENCY NOTIFICATION MEASURES		
Develop an emergency notification plan that complies with park, federal, and state requirements and allows contractors to properly notify park, federal, and/or state personnel in the event of an emergency during construction activities. This plan will address notification requirements related to fire, personnel, and/or visitor injury, releases of spilled material, evacuation processes, etc. The emergency notification plan will be submitted to the park for review/approval prior to commencement of construction activities.	Yosemite National Park, Project Manager	Prior to project activities
EROSION CONTROL MEASURES		
Conserve and salvage topsoil for reuse. Materials will be reused to the maximum extent possible.	Contractor	Concurrent with project activities
HAZARDOUS MATERIALS MEASURES		
An Oil and Hazardous Materials Spill Prevention, Control, and Countermeasure Plan will be prepared by the Construction Contractor for the project to address hazardous materials storage, spill prevention and response. The Plan will be submitted for park review and approval prior to construction.	Contractor	Prior to and concurrent with project activities
Store and use all hazardous materials in compliance with federal regulations. All applicable Materials Safety Data Sheets will be kept on site for inspection.	Contractor	Concurrent with project activities
Hazardous or flammable chemicals will be prohibited from storage in the staging area, except for those substances identified in the Oil and Hazardous Materials Spill Prevention, Control, and Countermeasure Plan. Hazardous waste materials will be immediately removed from project site in approved containers.	Contractor	Concurrent with project activities
Comply with all applicable regulations and policies during the removal and abatement of asbestos, lead paint, and polychlorinated biphenyls.	Contractor	Concurrent with project activities

Table 3.
Mitigation Measures and Best Management Practices Incorporated into the Selected Action

Mitigation Measures and Best Management Practices	Responsibility	Critical Milestones
<i>SOUNDSCAPES</i>		
Ensure that all construction equipment has functional exhaust/muffler systems.	Contractor	Concurrent with project activities
Submit a construction work plan/schedule that minimizes construction-related noise in noise-sensitive areas to the park for review/approval prior to commencement of construction activities.	Contractor	Prior to project activities
Use hydraulically or electrically powered construction equipment, when feasible.	Contractor	Concurrent with project activities
Locate stationary noise sources as far from sensitive receptors as possible.	Contractor	Concurrent with project activities
Limit the idling of motors except as necessary (e.g., concrete mixing trucks).	Contractor	Concurrent with project activities
To the extent possible, perform all on-site noisy work above 76 A-weighted decibels (dBA) (such as the operation of heavy equipment) between the hours of 9:00 a.m. and 5:00 p.m., or as directed by hotel management, to minimize disruption to hotel guests.	Contractor	Concurrent with project activities
<i>SCENIC RESOURCES PROTECTION MEASURES</i>		
Fence construction staging areas and construction activity areas to visually screen construction activity and materials.	Contractor	Concurrent with project activities
Consolidate construction equipment and materials in the staging areas at the end of each work day to limit the visual intrusion of construction equipment during nonwork hours	Contractor	Concurrent with project activities
<i>TRAFFIC CONTROL AND VISITOR PROTECTION MEASURES</i>		
Provide protective fencing enclosures around construction areas, including utility trenches, to protect public health and safety.	Contractor	Concurrent with project activities
<i>TRANSPORTATION MEASURES</i>		
Install appropriate traffic signs and barriers.	Yosemite National Park, Project Manager	Concurrent with and following project activities
<i>NIGHT SKY MEASURES</i>		
All new exterior lighting installed as part of this rehabilitation project will be historically compatible and conform to the <i>Yosemite National Park Outdoor Lighting Guidelines</i> .	Yosemite National Park, Project Manager	Concurrent with and following project activities
<i>WASTE MANAGEMENT MEASURES</i>		
Require construction personnel to adhere to park regulations concerning food storage and refuse management.	Yosemite National Park, Project Manager; Contractor	Concurrent with project activities
Properly secure trash during the workday and remove all trash from site at the end of each workday.	Yosemite National Park, Project Manager	Concurrent with and following project activities
Develop and implement a comprehensive waste management plan that complies with federal and state regulations and addresses all aspects related to the transportation, storage, and handling of construction-related hazardous and nonhazardous liquid and solid wastes and submit the plan to the park for review/approval prior to the commencement of construction activities.	Contractor	Prior to project activities

Public Involvement and Coordination

Public Scoping

A public scoping period for *The Ahwahnee Comprehensive Rehabilitation Plan Environmental Assessment* was initiated on August 13, 2009, and was subsequently extended through September 30, 2009. Two public meetings with a focus on this planning effort were held during the public scoping period: 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. The purpose of these meetings was to inform interested parties about the proposed project and solicit comments from members of the public in order to understand the spectrum of concerns, interests, and issues that should be considered in the planning process. In addition, information about the project was displayed and public comments were accepted at an informal public meeting at The Ahwahnee on September 8, 2009, and at the Park Public Open House on September 30, 2009 at the East Auditorium in Yosemite Valley.

Comments were invited for submission by mail, fax, email, through the Planning, Environment, and Public Comment (PEPC) website, and on comment forms that were made available during public scoping meetings. During the scoping period, the National Park Service received 9 letters from 7 individuals and 1 organization. An analysis of these letters identified 21 discrete comments, from which 18 general concern statements were generated.

Based on internal and public scoping comments and applicable federal law, regulations, and executive orders, the National Park Service determined that an environmental assessment would be the appropriate level of compliance for The Ahwahnee Comprehensive Rehabilitation Plan. Public scoping comments and issues raised by National Park Service staff were used in the alternatives development process and the analysis presented in the environmental assessment.

In addition, the National Park Service conducted targeted scoping for this planning effort in January 2010 to California museums, historical societies, and preservation groups, soliciting their input on the comprehensive planning process. No comments were received.

The following overarching issues were identified for consideration during the public scoping process and through input received from National Park Service staff and Yosemite National Park concessioner Delaware North Companies, Inc. staff:

- 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

The public outreach called for in section 106 of the National Historic Preservation Act was integrated with the NEPA scoping process described above, in accordance with the 1999 *Programmatic Agreement Among the National Park Service at Yosemite, the California State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Planning, Design, Construction, Operations, and Maintenance, Yosemite National Park, California*. In addition, because the comprehensive rehabilitation program will have an adverse effect on The Ahwahnee National Historic Landmark and has the potential to affect archeological sites that contribute to the Yosemite Valley Archeological District, the National Park Service

and the California State Historic Preservation Officer entered into a project-specific programmatic agreement (attached to the environmental assessment as Appendix A) (see Coordination, below). A draft programmatic agreement was released for public review through the PEPC website on January 4, 2011, and a targeted letter was sent to California museums, historical societies, and preservation groups providing notification of the development of the agreement and requesting comment. No comments were received.

Internal scoping and consultation with other government agencies and American Indian tribes and groups informed the planning process. See ‘Consultation,’ below, for more information.

Public Review and Comment Period

The Ahwahnee Comprehensive Rehabilitation Plan Environmental Assessment was released for public review on July 21, 2011, and the National Park Service accepted comments through August 23, 2011. The environmental assessment fulfilled the requirements under both NEPA and the National Historic Preservation Act (NHPA). The document was available online and hardcopies were available as requested. Approximately 12 hardcopies were distributed. In addition to being available at the Yosemite National Park Archives and Research Library, hardcopies were also provided to the following libraries for public review: Bassett Memorial library in Wawona, Mariposa County Public Library, El Portal Public Library, and Oakhurst Public Library in California.

The public review period was announced in a park press release, a Yosemite electronic news release, the *Yosemite National Park Daily Report*, the *Mariposa Gazette*, and on the Yosemite National Park website. During the review period, the National Park Service held an open house on July 27, 2011 to disseminate information and collect written comments on The Ahwahnee Comprehensive Rehabilitation Plan and other projects. The open house project presentation was available for live viewing and as a recording on the web for later viewing. The plan was available electronically and comments could be submitted online through the PEPC website at <http://parkplanning.nps.gov/AhwahneeRehab> and by U.S. mail and fax.

During the 34-day public comment period, the park received 9 public comment letters from 1 tribal group, 1 agency, and 7 individuals. The analysis of these letters identified 15 discrete comments, from which 9 general concern statements were generated. Although it is not required, the National Park Service developed a public comment and response report, available online at the PEPC website: <http://parkplanning.nps.gov/AhwahneeRehab>.

The main concerns expressed in public comments included:

- Whether seismic stability should be addressed in the comprehensive rehabilitation program
- Fire and life-safety issues
- Deteriorating conditions at the hotel
- Future availability of design plans for the code-required emergency access road and culverts
- References to culturally associated American Indian tribes and groups
- Support for Alternative 3 (Preferred Alternative) or Alternative 1
- Cost of Alternative 3

Concerns considered out of scope included comments on day and overnight use at The Ahwahnee and retail operations.

Consultation

U.S. Fish and Wildlife Service

The Endangered Species Act of 1973, as amended (16 USC 1531 et seq.) requires all federal agencies to consult with the U.S. Fish and Wildlife Service to ensure that any action authorized, funded, or carried out by the agency does not jeopardize the continued existence of listed species or critical habitat. The National Park Service obtained a list of federally listed endangered and threatened species that may be present in The Ahwahnee area in November 2009 from the U.S. Fish and Wildlife Service. This list was used as the basis for the special status species analysis in the environmental assessment. The U.S. Fish and Wildlife Service received a copy of *The Ahwahnee Comprehensive Rehabilitation Plan Environmental Assessment* during the public review period and responded on November 9, 2011 with no comments. Consultation with the U.S. Fish and Wildlife Service will continue, as defined by section 7 of the Endangered Species Act, as the rehabilitation plan is implemented.

Historic Preservation Agencies

During the initial phases of project planning in 2009, the National Park Service determined that the proposed rehabilitation project would have the potential to affect The Ahwahnee National Historic Landmark and the Yosemite Valley Historic District, as defined in 36 Code of Federal Regulations (CFR) part 800.16(i). Accordingly, the park initiated consultation with the California State Historic Preservation Officer (SHPO), the Advisory Council on Historic Preservation (ACHP), and the National Trust for Historic Preservation (NTHP) in September 2009.

During the development of the comprehensive rehabilitation plan, the National Park Service consulted with the SHPO and the ACHP pursuant to the 1999 *Programmatic Agreement Among the National Park Service at Yosemite, The California State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Planning, Design, Construction, Operations, and Maintenance, Yosemite National Park, California* (1999 Programmatic Agreement) and regulations at 36 CFR 800 for implementing section 106 of the National Historic Preservation Act of 1966, as amended (16 USC 470f).

California State Historic Preservation Officer

The National Park Service initiated consultation with the SHPO in September 2009. In 2010, the National Park Service submitted 100% conceptual design drawings and 50% schematic design drawings of the comprehensive rehabilitation plan alternatives for SHPO consideration and review. Following these submittals, the SHPO conducted a site visit to review project alternatives and consult with the National Park Service regarding the identification of the preferred alternative in October 2010. In December 2010, the SHPO submitted a letter outlining concerns with specific items included in the preferred alternative of the comprehensive rehabilitation program. These concerns were resolved by the National Park Service and SHPO verbally, by phone, on December 29, 2010, and were further documented in a written response from the National Park Service to the SHPO on January 12, 2011 and a response from SHPO to the National Park Service dated February 8, 2011.

Because the comprehensive rehabilitation program will have an adverse effect on The Ahwahnee National Historic Landmark and has the potential to affect archeological sites that contribute to the Yosemite Valley Archeological District, the National Park Service and the SHPO have entered into the 2011 Programmatic

Agreement, pursuant to 36 CFR 800.14(b). A draft programmatic agreement was released for public review on January 4, 2011, and a targeted letter was sent to California museums, historical societies, and preservation groups providing notification of the development of the agreement and requesting comment. No comments were received. The programmatic agreement was signed by the National Park Service and SHPO on January 24, 2011. The National Park Service will continue to consult with SHPO per the 2011 Programmatic Agreement.

Advisory Council on Historic Preservation

The National Park Service initiated consultation with the ACHP in September 2009. The ACHP subsequently acknowledged receipt of NPS communication and requested that the National Park Service notify the ACHP of a determination of adverse effect and provide adequate documentation for review. Accordingly, the National Park Service provided notification and supporting documentation regarding the development of a programmatic agreement for this planning effort pursuant to 36 CFR 800.14(b) on November 23, 2010. Based upon the information provided, the ACHP concluded that Appendix A, Criteria for Council Involvement in Reviewing Individual Section 106 Cases, of ACHP regulations, "Protection of Historic Properties" (36 CFR Part 800), does not apply to this planning effort, and the ACHP therefore declined to participate in the development or execution of the programmatic agreement on December 15, 2010. Pursuant to 36 CFR 800.6(b)(1)(iv), the National Park Service has filed the final, signed 2011 Programmatic Agreement and related documentation with the ACHP.

National Trust for Historic Preservation

The National Park Service initiated consultation with the NTHP in September 2009. In addition, the National Park Service provided notification and supporting documentation regarding the development of a programmatic agreement for this planning effort pursuant to 36 CFR 800.14(b), on November 23, 2010. The NTHP verbally acknowledged the NPS communication and declined to participate in the development of a programmatic agreement on December 6, 2010.

American Indian Tribes and Groups

Yosemite National Park is consulting with American Indian tribes and groups having cultural association with The Ahwahnee area, including the American Indian Council of Mariposa County, Inc. (Southern Sierra Miwuk Nation), Bishop Paiute Tribe, Bridgeport Paiute Indian Colony, Mono Lake Kutzadika'a Tribe, the North Fork Rancheria of Mono Indians, the Picayune Rancheria of Chukchansi Indians, and the Tuolumne Band of Me-Wuk Indians on proposed actions under The Ahwahnee Comprehensive Rehabilitation Plan.

Consultation with these tribes and groups regarding this planning effort was initiated in September 2009 through written correspondence. The National Park Service discussed The Ahwahnee Comprehensive Rehabilitation Plan during government-to-government consultations with the tribes and groups at yearly, quarterly, and monthly tribal meetings in late 2009 and early 2010. Consultation continued during the planning process as described below.

Each of the tribes and groups listed above was provided with a letter dated January 5, 2011 inviting their participation as a concurring party to the programmatic agreement for this project, with an attached copy of the draft programmatic agreement for their consideration. On February 23, 2011, a consultation meeting was held as requested with the Tuolumne Band of Me-Wuk Indians to discuss the programmatic

agreement. On February 24, 2011, the North Fork Rancheria of Mono Indians signed the programmatic agreement as a concurring party.

In addition, a copy of the administrative review draft of the environmental assessment was provided to the American Indian tribes and groups for review and comment in February 2011. Comments were received from The Bishop Paiute Tribe and the North Fork Rancheria of Mono Indians of California and were considered during the preparation of this assessment for public review.

The American Indian tribes and groups also received copies of the environmental assessment during the public review period. No comments were received from any of the seven tribes and groups culturally associated with the park. Comments on the public review document were received from the Yosemite-Mono Lake Paiute Indian Community and are documented in the public comment and response report. The public comment and response report can also be reviewed online at:
http://parkplanning.nps.gov/Ahwahnee_Rehab.

Consultation and partnering will continue with the American Indian tribes and groups throughout the design and implementation of The Ahwahnee Comprehensive Rehabilitation Plan.

U.S. Army Corps of Engineers

Yosemite National Park initiated consultation with the U.S. Army Corps of Engineers (USACE) regarding the EA and permit requirements necessary to implement proposed actions in The Ahwahnee Comprehensive Rehabilitation Plan. The USACE received a copy of *The Ahwahnee Comprehensive Rehabilitation Plan Environmental Assessment* during the public review period. Per a letter dated October 5, 2011, USACE requested that a wetlands delineation be prepared for review and approval prior to construction. Prior to construction activities, the National Park Service will obtain authorization and required permits from the USACE for bridge installation along the emergency vehicle access.

Central Valley Regional Water Quality Control Board

The State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCB) are the regulatory boards within California's Environmental Protection Agency which derive their authority from section 401 of the Clean Water Act. The SWRCB allocates rights to use of surface water and along with the RWQCBs are charged with protecting surface, ground and coastal waters throughout the state. The RWQCBs issue permits which govern and restrict the amount of pollutants that can be discharged into the ground or surface water, which included regulating storm water during construction activities. Yosemite National Park is under the jurisdiction of Regional Board (5), Central Valley, and therefore consults with and obtains any necessary permits and/or certification for construction activities from the Central Valley RWQCB.

Yosemite National Park initiated consultation with the Central Valley RWQCB regarding the environmental assessment and permit requirements necessary to implement actions in The Ahwahnee Comprehensive Rehabilitation Plan. The Central Valley RWQCB received a copy of *The Ahwahnee Comprehensive Rehabilitation Plan Environmental Assessment* during the public review period and contacted the park with an inquiry regarding proposed grease and water discharge. The park responded that discharges are made to the sanitary sewer system; there were no further comments. Prior to construction activities, the National Park Service will prepare and submit a Stormwater Pollution Prevention Plan and will obtain authorization and required permits for bridge installation along the emergency access route.

Non-Impairment of Park Resources

Pursuant to the 1916 Organic Act, the National Park Service has a management responsibility “to conserve the scenery and the natural and historic objects and the wildlife therein and provide for the enjoyment of future generations.” Therefore, the National Park Service cannot take an action that will “impair” park resources or values. Based on the analysis provided in *The Ahwahnee Comprehensive Rehabilitation Plan Environmental Assessment*, the magnitude of adverse impacts and/or adverse effects is not sufficient to impair a resource or a value whose conservation is:

- Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of Yosemite National Park
- Key to the natural or cultural integrity of Yosemite National Park or to opportunities for enjoyment of the park
- Identified as a goal in the park’s *General Management Plan* or other relevant National Park Service planning documents

Consequently, the National Park Service concludes that implementation of the Selected Action will not violate the National Park Service Organic Act of 1916.

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Conclusion

Based on the information contained in *The Ahwahnee Comprehensive Rehabilitation Plan Environmental Assessment* as summarized above; the minimal nature of comments received from affected agencies and the public; the execution of a project-specific programmatic agreement between the National Park Service and the State Historic Preservation Officer to resolve the adverse effect on the historic properties to be affected; and the incorporation of mitigation measures and best management practices to avoid or reduce potential direct, indirect, and cumulative impacts; it is the determination of the National Park Service that the Selected Action is not a major federal action significantly affecting the quality of the human environment. There will be no unacceptable impacts or impairment of park resources and values as a result of the Selected Action.

In accordance with the National Environmental Policy Act of 1969 and regulations of the Council on Environmental Quality (40 CFR 1508.9), an environmental impact statement will not be prepared. The Selected Action as detailed in *The Ahwahnee Comprehensive Rehabilitation Plan Environmental Assessment* may be implemented as soon as practicable.


Recommended:

 12/21/11

Don L. Neubacher
Superintendent, Yosemite National Park

Date

Approved:

 1/3/12

Christine S. Lehnertz
Regional Director, Pacific West Region, National Park Service

Date

Errata Sheets for The Ahwahnee Comprehensive Rehabilitation Plan Environmental Assessment

The following list includes clarifications or corrections to the environmental assessment (EA). None of the corrections listed below substantially affects the analyses or conclusions of the effects in the EA.

Page 2-3, Figure 2-1: The project area boundary has been corrected to include all eight cottages at The Ahwahnee (see revised Figure 1, page 2, below).

Page 2-22, Figure 2-7: The project area boundary has been corrected to include all eight cottages at The Ahwahnee (see revised Figure 2, page 3, below).

Pages 3-119 and 3-121, Fire and Life-Safety, 1st paragraph: Delete “Ground disturbance within archeological site CA-MRP-292/293 would be required for installation of the exit” as there would be no further ground disturbance associated with installation of an exterior exit from the Tresidder Room.

Page D-1, Cumulative Plans and Projects, Past Actions: Delete “Provide Secondary Egress from 5th and 6th Floors” bullet and add “Provide Secondary Egress from 5th and 6th Floors” bullet under Current Actions, as this project was accelerated due to the need to address critical code compliance issues identified by the park’s Fire Marshal and was not yet completed when the environmental assessment was released for public review.

Page D-3 and D-5: Delete project description for “Provide Secondary Egress from 5th and 6th Floors” from Past Actions and add the project description under Current Actions. The following is added to the end of the project description: “This project will also provide an additional means of egress from the hotel’s South Mezzanine by constructing a new exterior exit from the Tresidder Room to meet fire code egress requirements.”

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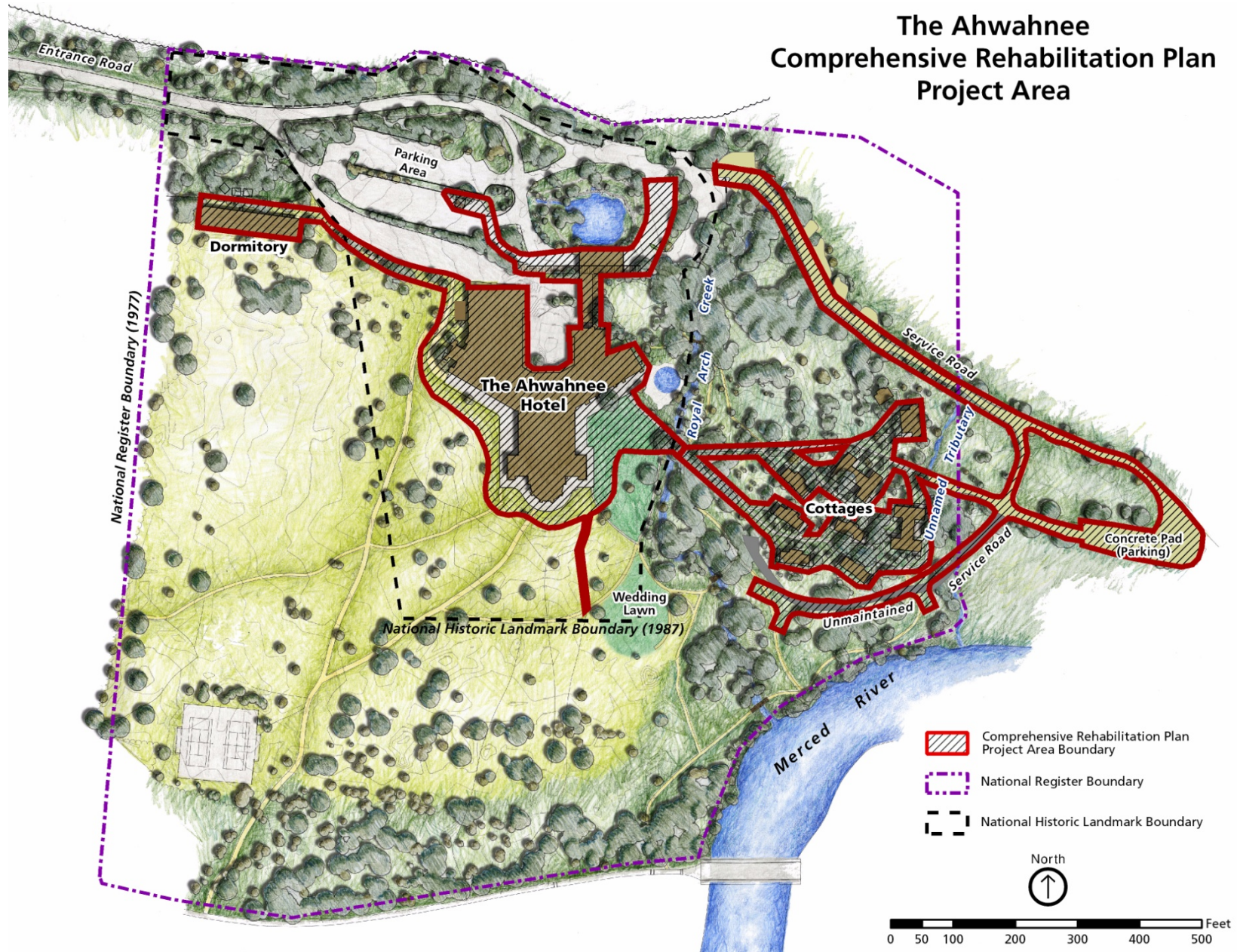


Figure 1. The Ahwahnee Comprehensive Rehabilitation Plan Project Area

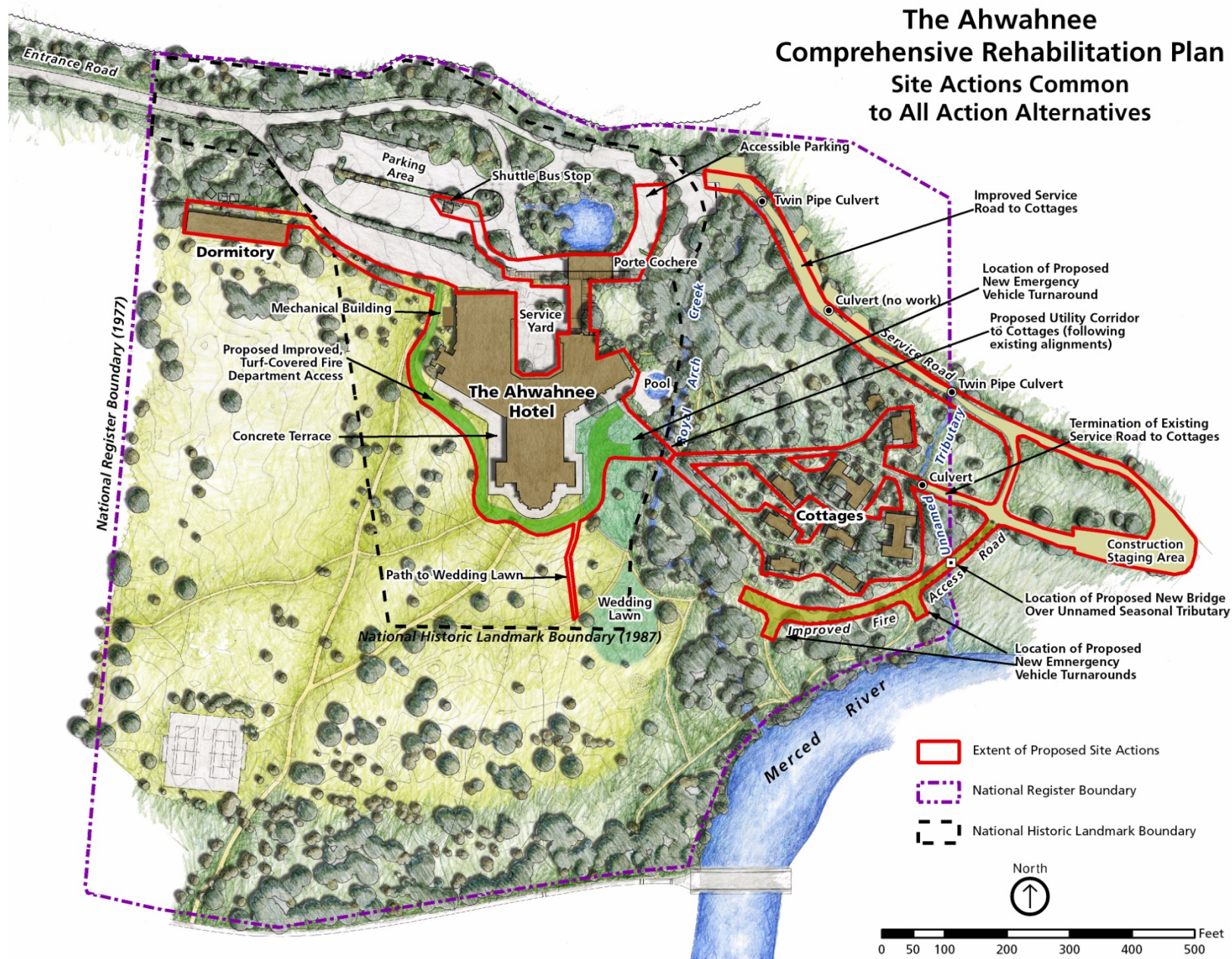


Figure 2. Site Actions Common to All Action Alternatives

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**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**

WHEREAS, the U.S. Department of the Interior, National Park Service (NPS) at Yosemite National Park (the Park) proposes to administer a comprehensive rehabilitation program for The Ahwahnee hotel and associated guest cottages (collectively The Ahwahnee) in the Park through actions to provide code-compliant fire protection systems, egress, seismic safety, and accessibility; to preserve and protect the historic fabric and integrity of the historic property; to upgrade mechanical, electrical, and plumbing systems; to enhance sustainability by upgrading thermal efficiency of the buildings and improving energy and water-use efficiency; and to improve functionality and operational efficiency to ensure The Ahwahnee's continued use and enjoyment by the American public (the Undertaking); and

WHEREAS, The Ahwahnee is a National Historic Landmark (NHL) and a contributor to the Ahwahnee Developed Area within the Yosemite Valley Historic District; and

WHEREAS, NPS consulted with the California State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation (ACHP) pursuant to the 1999 *Programmatic Agreement Among the National Park Service at Yosemite, The California State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Planning, Design, Construction, Operations, and Maintenance, Yosemite National Park, California* (1999 PA) and regulations at 36 CFR 800 for implementing Section 106 of the National Historic Preservation Act of 1966, as amended (16 USC 470f); and

WHEREAS, NPS and SHPO are entering into this programmatic agreement (PA) because the Undertaking will have an adverse effect on the NHL and has the potential to affect archeological sites that contribute to the Yosemite Valley Archeological District; and

WHEREAS, NPS notified ACHP and the National Trust for Historic Preservation (NTHP) of the intent to develop the PA pursuant to 36 CFR 800.14(b), and invited the agencies to participate, via letters dated November 23, 2010, and both agencies declined to participate in consultations to develop this PA (ACHP in writing via letter dated December 15, 2010, and NTHP verbally via telephone on December 6, 2010); and

WHEREAS, a Historic Structures Report, a Cultural Landscape Report, and a Historic Furnishings Report for The Ahwahnee (REPORTS) are being completed to inform the planned actions that comprise the Undertaking; and

WHEREAS, actions that comprise the Undertaking will be described and analyzed in the Comprehensive Rehabilitation Plan Environmental Assessment and 100% schematic design document, which will be completed in 2011; and

WHEREAS, NPS has notified the public and interested parties of the proposed Undertaking through public scoping meetings; targeted outreach letters to California museums, historical societies, and preservation groups; regular open house presentations in Yosemite Valley; gateway community meetings; and electronic media such as web sites and daily reports; and provided them an opportunity to comment through the National Environmental Policy Act review process; and

WHEREAS, NPS has notified the public of the development of this PA through the NPS Planning, Environment, and Public Comment website and targeted outreach to museums, historical societies, and preservation groups; and has provided the opportunity to review and comment on the PA; and

WHEREAS, NPS has determined and SHPO has concurred that the Area of Potential Effect (APE) for the Undertaking incorporates areas within the site boundaries as described in the 1977 National Register of Historic Places (NRHP) nomination for The Ahwahnee Hotel, which includes The Ahwahnee hotel, eight multi-unit cottages, parking areas, employee dormitory, meadow, and hotel grounds; the area west of the 1977 NRHP nomination western boundary containing the Ahwahnee Road, the pedestrian/bicycle path, the bridle path, and the stone hotel

entry gatehouse features; and the area east of the 1977 NRHP nomination eastern boundary containing an unpaved road and a service/storage area, as identified in Attachment A to this PA; and

WHEREAS, the APE coincides in part with the general location of the mid-nineteenth century American Indian village of Wis'-kah-lah and Yosemite Valley traditional cultural use areas, NPS has consulted with the Tuolumne Band of Mewuk Indians, the Bridgeport Paiute Indian Colony, the Bishop Paiute Tribe, the North Fork Rancheria of Mono Indians and the Picayune Chukchansi Indians, the American Indian Council of Mariposa County, Inc. (aka Southern Sierra Miwuk Nation), and the Mono Lake Kutzadikaa Paiute Indian Community, and invited each to participate as a concurring party to this PA via letters dated January 5, 2011; and

WHEREAS, work conducted under the Undertaking will occur over a number of years, through a phased implementation approach, pending funding approvals; and

WHEREAS, the Park has on staff or has access to qualified cultural resource specialists who meet, as a minimum, the appropriate qualifications set forth in the Secretary of the Interior's Professional Qualifications Standards to carry out programs for historic preservation including history, historic architecture, historic landscape architecture, archeology, and ethnography;

NOW, THEREFORE, NPS at Yosemite National Park and SHPO (the Signatories) agree that the Undertaking shall be implemented in accordance with the following stipulations in order to take into account the effects of the Undertaking on historic properties, and further agree that these stipulations shall govern the Undertaking and all of its parts until this PA expires or is terminated.

STIPULATIONS

I. Definitions

The definitions provided at 36 CFR 800.16 are applicable throughout this PA.

II. Professional Qualifications and Standards

- A.** All historic preservation activities implemented pursuant to this PA shall be carried out by or under the direct supervision of a person or persons meeting at a minimum the Secretary of Interior's Professional Qualifications Standards (48 FR 44738-39) for the discipline appropriate to the historic property in question.
- B.** Any inventory or documentation of historic properties pursuant to implementation of the PA shall conform to the provisions of the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation (48 FR 44716-44740) and applicable standards and guidelines for historic preservation established by SHPO.
- C.** Curation of materials and records resulting from actions stipulated by this PA shall be in accordance with 36 CFR 79. Such materials and records shall be curated by NPS to the extent permitted by sections 5097.98 and 5097.991 of the California Public Resources Code.
- D.** The Signatories to this PA acknowledge that historic properties covered by this PA are subject to the provisions of section 304 of the NHPA and section 6254.10 of the California Government Code (Public Records Act), relating to the disclosure of archeological site information and, having so acknowledged, shall ensure that all actions and documentation prescribed by this PA are consistent with said sections.

III. Consultation

- A.** NPS initiated consultation with SHPO on September 2, 2009, via written correspondence, and has continued consultation through visits by NPS to SHPO offices in Sacramento on September 15, 2009, and March 11, 2010; a visit by SHPO staff to the Park on October 21, 2010; and correspondences at various study and design stages of the planning process for the Comprehensive Rehabilitation Program.
- B.** NPS shall continue to consult with SHPO regarding design and construction planning as described below:

1. Submission of Project Documents – Comprehensive Rehabilitation Program. NPS has submitted or shall submit schematic design (50% and 100%), design development (50% and 90%), and construction working documents for each phase of work to SHPO for review and comment.
2. SHPO shall have 30 calendar days from the date of receipt to provide comments to NPS. If SHPO fails to respond within this time, NPS shall assume SHPO has no comments and will proceed to the next step in the design process.
3. Through consultation and by mutual agreement, NPS and SHPO may adopt a more expedited review process for portions of the Undertaking, as circumstances indicate. If departure from the review process outlined in Stipulations III.B.1 and III.B.2 of this PA is adopted, NPS shall document the expedited process and the consultations through which the mutual decision to expedite was made, via the reporting specified in Stipulation XIII of this PA.

IV. Actions to Resolve Adverse Effects

A. Documentation

1. NPS shall complete HABS photographic documentation of The Ahwahnee hotel and cottages. HABS documentation for areas of the hotel and cottages to be directly affected by the Undertaking will be completed prior to implementing actions in those respective areas. The Park shall consult with the HABS/HAER/HALS coordinator for the NPS Pacific West Region to determine the type and level of documentation.

B. NHL Nomination Form Update

1. NPS shall update the NHL nomination form for The Ahwahnee to reflect the findings of historical research conducted in preparation of the REPORTS. The revised content for the nomination form will be prepared in consultation with qualified cultural resource staff and in collaboration with the NPS Pacific West Regional Office cultural resources staff, and submitted to the SHPO for 30-day review and comment before being submitted to the NPS Regional NHL Program.

C. Interpretation

1. NPS shall incorporate selected historic information compiled in the REPORTS or through other research conducted in conjunction with, and collected during implementation of, the Undertaking into interpretive media and materials on The Ahwahnee, to be prepared in consultation with qualified cultural resource staff. NPS will make interpretive media and materials available in more than one format (e.g., written pamphlet, web media) for distribution to the public.
2. NPS shall prepare a report to document the rehabilitation Undertaking. As each rehabilitation phase is completed, that phase will be described through narrative and photographic documentation of conditions before, during, and after construction activities. NPS shall submit the draft phase reports to SHPO for 30-day review and comment. NPS shall submit the final phase reports to the Park archives and provide these reports through web media accessible to the public for each major phase of the Undertaking.

V. Archeological and Traditional Cultural Resources

- A.** NPS shall conduct archeological monitoring of all ground-disturbing activities for this Undertaking in accordance with Stipulation VII. All archeological investigations conducted in support of the Undertaking, including testing and data recovery, shall be carried out in accordance with a treatment plan consistent with the *Archeological Synthesis and Research Design* and in consultation with the SHPO and American Indian tribes and groups participating in this PA. NPS National Register determinations of eligibility (DOEs) shall be submitted to SHPO in accordance with Stipulation VI of this PA.
- B.** NPS shall afford American Indian representatives from the culturally associated tribes and groups an opportunity to participate in the protection of resources to which they attach cultural, spiritual, and/or religious significance that may be affected by the Undertaking, including archeological investigations.

VI. Post-Review Discoveries and Unanticipated Effects

- A.** If it appears that an action of the Undertaking will affect a previously unidentified property that may be eligible for inclusion in the National Register or affect a known historic property in an unanticipated manner, NPS will halt construction activities in the vicinity of the discovery, and take all reasonable measures to avoid or minimize harm to the property. Within two (2) working days of the discovery, NPS shall notify SHPO via telephone of the discovery, and shall provide via electronic mail to SHPO an assessment of National Register eligibility of the property and description of actions proposed to resolve any potential adverse effects.
- B.** SHPO shall respond to NPS within two (2) working days of the notification via electronic mail. NPS shall take into account SHPO's recommendations regarding National Register eligibility and proposed actions, and then shall carry out appropriate actions. NPS shall provide SHPO a report of the actions when they are completed.

VII. Monitoring of Construction Activities

NPS subject matter experts will be available on site during construction activities. SHPO and Tribes may monitor activities pursuant to this agreement. NPS shall cooperate with SHPO and Tribes in carrying out any monitoring and review responsibilities. Tribes will be invited to participate in monitoring of any ground disturbing activities associated with the Undertaking.

VIII. Relationship to Other Existing Agreements and Acts

This PA shall not be construed to supersede or contravene the provisions of the following: Archaeological Resources Protection Act (1979), as amended; Native American Graves Protection and Repatriation Act (1990); American Indian Religious Freedom Act (1978). This PA shall supersede the provisions of the 1999 *Programmatic Agreement Among the National Park Service at Yosemite, The California State Historic Preservation Officer and the Advisory Council on Historic Preservation Regarding Planning, Design, Construction, Operations and Maintenance, Yosemite National Park, California* (1999 PA) only for actions of the Undertaking of The Ahwahnee Comprehensive Rehabilitation Plan.

IX. Dispute Resolution

- A.** The signatories agree that this PA shall guide the implementation of the Undertaking for addressing its effects to and treatment of historic properties until this PA expires or is terminated. Should any of the signatories of this PA at any time object in writing to the manner in which the terms of this PA are implemented, to any action carried out or proposed with respect to implementation of this PA, or to any document prepared in accordance with and subject to the terms of this PA, the objecting party shall notify the other signatories of this PA. The signatories shall consult for 30 days from receipt of the notice of objection to promptly resolve the objection.
- B.** If the objection is resolved through consultation, NPS shall notify in writing the other signatories of the terms of the resolution, and NPS may proceed in accordance with the terms of such resolution.
- C.** If after initiating consultation, NPS determines that the objection cannot be resolved through consultation, or if the duration of the consultation has exceeded 30 days from the commencement of consultation to resolve the dispute, NPS shall forward all documentation relevant to the objection to the ACHP, including NPS's proposed resolution of the objection, with the expectation that the ACHP will respond within 30 days after receipt of such documentation by either:
 - 1. Advising NPS that the ACHP concurs in NPS's proposed resolution of the objection, whereupon NPS shall notify the other signatories, and NPS shall resolve the objection accordingly; or
 - 2. Providing NPS with recommendations, which NPS shall take into account in reaching a final decision to resolve the objection. NPS shall notify all the signatories and the ACHP of its final decision.

If the ACHP or any of the signatories object to the final decision, the objecting party shall notify the other signatories and the ACHP, and the ACHP shall follow the procedures at 36 CFR 800.7(c).

- D.** The procedures outlined in Stipulations IX.A to IX.C, above, shall apply only to the subject of the objection. NPS's responsibility to carry out all actions under this PA that are not the subjects of the objection, and which do not foreclose the consideration of alternatives to resolve the objection, shall remain unchanged.
- E.** At any time during implementation of the terms of this PA, should a member of the public object to the manner of such implementation, NPS shall immediately notify SHPO in writing. NPS shall consult with the objecting party and, if the objecting party so requests, with the other parties to this PA, for no more than 30 days. Within 30 days following closure of this consultation period, NPS will render a decision regarding the objection and notify the other parties of its decision in writing. In reaching its decision, NPS will take all comments from the other parties into consideration. NPS's decision regarding resolution of the objection will be final.

X. Amendments

Either signatory party may propose that this PA be amended, whereupon NPS and SHPO shall consult to consider such amendment pursuant to 36 CFR 800.6(c)(7 and 8). This PA may be amended only upon the written agreement of both signatories to the Agreement. The amended PA shall take effect on the date that it is executed by NPS and SHPO. NPS shall then submit a copy of the amended PA to ACHP and the concurring parties to this PA.

XI. Termination

- A.** If a signatory party to this PA proposes termination of this PA, the party proposing termination shall, in writing, notify the other, explain the reasons for proposing termination, and consult for 30 days to seek alternatives to termination.
- B.** Should such consultation result in an agreement on an alternative to termination, then the signatories shall proceed to amend this PA in accordance with Stipulation X.
- C.** Should such consultation fail to find an alternative to termination, the party proposing termination may terminate this PA by promptly notifying the other parties in writing. Termination hereunder shall render this PA without further force or effect.
- D.** Should this PA be terminated, NPS shall consult with SHPO to develop a new PA in accordance with 36 CFR 800.14(b). Until and unless a new PA is executed for the undertaking, NPS will consult with the SHPO in accordance with 36 CFR 800.4 through 6.

XII. Duration of the PA

- A.** Unless terminated pursuant to Stipulation XI, the duration of this PA is twenty (20) years from the date of its execution or until this project is complete, whichever is shorter. Five (5) years after the date of executing this Agreement, and every five (5) years thereafter for the duration of the term of the PA, NPS shall contact SHPO in writing to organize a review of the sufficiency of the PA and consider potential amendments of its terms, as appropriate.
- B.** If stipulations are not carried out by the expiration of the PA, NPS shall consult with SHPO to determine if the PA should be allowed to expire or should be extended through amendment. Unless NPS and SHPO agree on an extension, the PA shall automatically terminate 20 years from the date of execution and have no further force or effect.

XIII. Reporting

NPS will describe how the agency is carrying out its responsibilities under this PA by including a summary of Undertaking actions taken, including those described in Stipulations V, VI, and VII, within an annual report. NPS shall submit the draft annual reports to SHPO for 30-day review and comment. NPS shall provide the final annual reports to SHPO, concurring parties to this PA, and ACHP, and shall make these reports available to the public through the Yosemite Research Library and on the Yosemite National Park website.

XIV. Effective Date of the PA

This PA shall take effect on the latest date that it is signed and executed by NPS and SHPO.


XV. Anti-Deficiency Act

Any requirement for the payment or obligation of funds by the Government established by the terms of this PA shall be subject to availability of appropriated funds. No provision in this PA shall be interpreted to require obligation or payment of funds in violation of the Anti-Deficiency Act, 31 USC Section 1341. If the availability of funds and compliance with the Anti-Deficiency Act impair NPS' ability to perform under this PA, then NPS shall consult in accordance with Stipulation X of this PA.

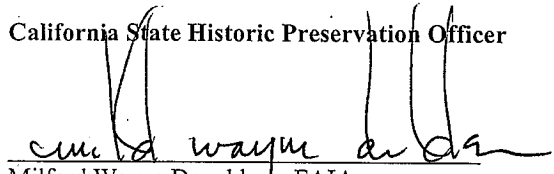
EXECUTION of this PA, its subsequent filing with the ACHP, and implementation of its terms evidence that NPS has taken into account the effects of this Undertaking on historic properties and has afforded the ACHP, SHPO, and Tribes an opportunity to comment on the Undertaking and its effect on historic properties.

SIGNATORIES

National Park Service

 Date: 1/20/11
Don L. Neubacher
Superintendent, Yosemite National Park

California State Historic Preservation Officer

 Date: 24 JAN 2011
Milford Wayne Donaldson, FAIA
State Historic Preservation Officer

CONCURRING PARTIES

**American Indian Council of Mariposa County
aka Southern Sierra Miwuk Nation**

Name Title

Date: _____

Bishop Paiute Tribe

Name Title

Date: _____

Bridgeport Paiute Indian Colony

Name Title

Date: _____

Mono Lake Kutzadika^a Tribe

Name Title

Date: _____

North Fork Mono Rancheria

Julie L. Smith Tribal Chairman

Name Title

Date: 2/24/11

Picayune Rancheria of the Chukchansi Indians

Name Title

Date: _____

Tuolumne Band of Me-Wuk Indians

Name Title

Date: _____

Attachment A – Defined Area of Potential Effect for this Programmatic Agreement



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Merced Wild and Scenic River Section 7 Determination

Introduction

Purpose of this Determination

In 1987, the United States Congress designated the Merced Wild and Scenic River to protect the river's free-flowing condition and to protect and enhance its unique values for the benefit and enjoyment of present and future generations (16 USC 1271). This designation gives the Merced River special protection under the Wild and Scenic Rivers Act.

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. The Ahwahnee Comprehensive Rehabilitation Plan includes three actions that would be located on stream tributaries to the Merced Wild and Scenic River and therefore require additional consideration under section 7(a) of the Wild and Scenic Rivers Act. The purpose of this determination is to evaluate the potential of these actions to either invade or diminish the scenic, recreational, fish, or wildlife values of the wild and scenic river.

Authority

The authority for this determination is found in section 7(a) of the Wild and Scenic Rivers Act (Public Law 90-542, as amended, 16 United States Code [USC] 271-1278). Section 7 states:

...no department or agency of the United States shall assist by loan, grant, license or otherwise in the construction of any water resources project¹ that would have a direct and adverse effect on the values for which such river was established, as determined by the Secretary charged with its administration. Nothing contained in the foregoing sentence, however, shall preclude licensing of, or assistance to, developments below or above a wild, scenic or recreational river area or on any stream tributary thereto which will not invade the area or unreasonable diminish the scenic, recreation, and fish and wildlife values present in the area of the date of designation of a river as a component of the national wild and scenic rivers system.

While the Wild and Scenic Rivers Act does not prohibit development along a river corridor, it does prohibit activities that would interfere with the free-flowing condition of the river or degrade the values for which it was designated wild and scenic. The Act specifies guidelines for the determination of appropriate actions in the bed and banks of the river and either below, above, or on a tributary to a wild and scenic river. As the designated river manager for the Merced River segments located within the boundaries of Yosemite National Park, the National Park Service must carry out a determination of effects on all proposed water resources projects¹ in accordance with section 7(a) of the Act.

¹ A water resources project is any dam, water conduit, powerhouse, transmission line, or other works project under the Federal Power Act, or other developments, that would affect the free-flowing character of a wild and scenic or congressionally authorized study river. In addition to projects licensed by the Federal Energy Regulatory Commission, water resources project may include: dams, water diversions, fisheries habitat and watershed restoration, bridges and other roadway construction/reconstruction projects, bank stabilization projects, channelization projects, levee construction, boat ramps, fishing piers, and activities that require a Section 404 permit from the U.S. Army Corps of Engineers (Interagency Wild and Scenic Rivers Coordinating Council 2004.)

Methodology

While the Ahwahnee Comprehensive Rehabilitation Plan does not propose actions within the bed and banks of the Merced Wild and Scenic River, actions are proposed on two upstream tributaries. Section 7(a) of the Act provides a specific standard for review of developments below or above or on a stream tributary to a designated river. Such developments may occur as long as the project “will not invade the area or unreasonably diminish the scenic, recreational, and fish and wildlife values present in the area as of the date of designation. . .” This section 7 evaluation for three actions associated with The Ahwahnee Comprehensive Rehabilitation Plan is based on guidance provided in the Wild and Scenic Rivers Act: Section 7 Technical Report, Appendix D: Evaluation Procedure under “Invade the Area or Unreasonably Diminish” (Interagency Wild and Scenic Rivers Coordinating Council 2004) .

The initial question to be addressed is whether or not the proposed project invades the designated river. The term “invade” is defined as “encroachment or intrusion upon.”

If the proposed project does not invade the designated river, the next question to be answered, relative to the standard in section 7(a), is whether or not the proposed project will “unreasonably diminish” any of the specified values. Given that the standard implies that some diminution of values may be determined reasonable, there are two questions to consider:

1. Does the proposed project cause diminution of the scenic, recreation, and fish and wildlife values of the designated river as present at the date of designation?
2. If there is diminution, is it unreasonable? This would suggest an evaluation of the magnitude of the loss. Factors to be considered include:
 1. Whether the value contributed to the designation of the river (i.e., an outstandingly remarkable value); and,
 2. The current condition and trends of the resource. (If diminution is determined unreasonable, measures may be recommended to reduce adverse effects to within acceptable levels).

Merced Wild and Scenic River Outstandingly Remarkable Values

Outstandingly remarkable values are the river-related values that make the river unique and worthy of special protection. They form the basis for the river’s designation as wild and scenic. The current version of the outstandingly remarkable values for the Merced River (October 2011) for the Yosemite Valley segment are outlined below.

Biological

The meadows and riparian communities of Yosemite Valley comprise one of the largest mid-elevation meadow complexes in the Sierra Nevada.

Geologic/Hydrologic

- The “Giant Staircase,” which includes Vernal and Nevada Falls, is one of the finest examples in the western United States of stair-step river morphology.
- The El Capitan Moraine is an extraordinary example of a recessional moraine.

- The Merced River from Happy Isles to the west end of Yosemite Valley provides an outstanding example of a rare, mid-elevation alluvial river.

Cultural

- Yosemite Valley Native American ethnographic resources include a linked landscape of specifically mapped traditional plant gathering areas.
- The Yosemite Valley Archeological District is a linked landscape that contains dense concentrations of resources that represent thousands of years of human settlement along this segment of the Merced River.

Scenic

Visitors to Yosemite Valley experience scenic views of some of the world's most iconic scenery, with the river and meadows forming a placid foreground to towering cliffs and waterfalls.

Recreational

Visitors to Yosemite Valley enjoy a wide variety of river-related recreational activities in the valley's extraordinary setting along the Merced River.

Rationale for Determination

The *Ahwahnee Comprehensive Rehabilitation Plan Environmental Assessment* provides the basis for this section 7 determination. The comprehensive rehabilitation plan is in compliance with established policies and plans providing direction for Yosemite National Park. The document also fulfills the requirements of section 102(2) C of the National Environmental Policy Act and section 106 the National Historic Preservation Act. The Affected Environment and Environmental Consequences section of the environmental assessment (Chapter 3) describes the existing condition of resources in the project vicinity and analyzes the potential environmental impacts associated with implementation of each of the proposed alternatives.

Project Description

The comprehensive rehabilitation plan provides for phased, long-term rehabilitation of The Ahwahnee hotel and its associated buildings and structures in Yosemite Valley. 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. The Ahwahnee hotel was listed on the National Register of Historic Places in 1977 and was designated a National Historic Landmark in 1987.

After more than 80 years in service, 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.

Action 1: Code-Required Emergency Access Road - Bridge

The existing fire department access road from the eastern end of The Ahwahnee hotel parking area to the cottages terminates at the service entrance to the cottages. Termination of the existing fire access road at this location is not in compliance with fire code requirements for maximum allowable distance between access roads and structures, as several cottages are too far from the service road for emergency vehicle access. (The majority of the cottages are more than 50 feet from a fire department access road, and several of the cottages are more than 150 feet from a fire department access road.) In order to meet fire code requirements for allowable distance, the existing access road would be extended south of the cottages along the alignment of an existing, unmaintained service road.

This unmaintained service road was selected for fire department access because it provides the only existing access to southern and western side of the cottage area and it is the only means to access existing fire hydrants in that area. However, this unmaintained service road is not currently compliant with fire code requirements for width, surfacing, drainage crossings, and turnarounds. To extend the fire department access along this alignment, this project would improve the unmaintained service road to comply with fire code specifications.

Currently, the unmaintained service road crosses an unnamed seasonal tributary to the Merced River via a hardened earth low-water crossing. Low-water crossings are not compliant with fire code because drainage crossings must be “all-weather,” where emergency vehicles are not subject to passing through water, ice, or soft roadbeds. Therefore, the National Park Service has determined that a bridge is required at the drainage crossing to allow emergency vehicles and personnel to access the cottages in a code-compliant manner.

Action 2: Code-Required Emergency Access Road - Culverts

The existing fire department access road to the cottages includes five culverts at drainage crossings on tributaries to the Merced River: a twin pipe culvert at Royal Arch Creek, and a single pipe culvert and a twin pipe culvert at the unnamed seasonal tributary. The road to the cottages narrows to as little as 9 feet wide over these culverts; to comply with fire code, all existing culverts may need to be improved or replaced to support road widening to a code-compliant width. In addition, it is not known if the existing culverts comply with fire code load-bearing requirements. The existing culverts would need to be modified or replaced to meet fire code requirements for road width and load weight.

Action 3: Consolidated Utility Corridor

The third action involves installing a consolidated utility corridor from the hotel to the cottages following existing circulation paths to the extent possible. Further design will dictate the exact route and distribution points the utility corridor will follow, however, the route would require crossing Royal Arch Creek, a tributary to the Merced River. It is anticipated that utilities would be suspended from underneath the existing footbridge over Royal Arch Creek.

Analysis

Considerations

Does the proposed project invade the designated Merced River?

The proposed actions would be located within the Merced Wild and Scenic River corridor, near the east end of the Yosemite Valley segment, within The Ahwahnee hotel cultural landscape. The proposed actions would occur on two tributaries to the Merced River, but would not be located within the 100-year floodplain. Culvert work would occur within the bed and banks of the tributaries, and construction work could occur within the ordinary high water mark.

Potential construction impacts from these three actions would be minimized by scheduling construction activities during seasonal periods of low or no water. Additional mitigation measures would include minimizing the disturbance area at the banks of the tributaries, salvaging excavated materials for replacement after construction, returning the banks to their pre-existing contours, and implementing best management practices (see Appendix E of the environmental assessment) during construction to ensure that construction activities would not affect water turbidity, sediment loading, temperature, or nutrient availability.

The span and abutment placement for the bridge and the final culvert dimensions would be determined by hydrologists and engineers during the design phase of the project. The bridge design and culverts would accommodate braided flow channels in order to minimize impacts on hydrologic function and free-flowing condition. In addition, the bridge abutments would be constructed outside of the ordinary high water mark to the extent feasible and in accordance with U.S. Army Corps of Engineers and California Regional Water Quality Control Board permit stipulations. The bridge would also be designed to be low-profile and compatible with the character of the cultural landscape. In combination with the mitigation measures and best management practices proposed above for construction activities, the bridge and culverts would not impede the free-flowing condition of the Merced River, and hydrologic processes would be protected during low- and high-water periods.

Final design of the utility corridor would not impede hydrologic processes associated with Royal Arch Creek, as utilities would be suspended underneath an existing historic footbridge. The suspended utilities would not be visible from the foot path.

Therefore, the proposed actions will not encroach or intrude upon the hydrologic function of the Merced River and will not invade the wild and scenic river.

Does the proposed project unreasonably diminish the scenic, recreational, and fish and wildlife values present in the area as of the date of designation?

1986 Sierra National Forest Draft Forest and Resource Management Plan	Merced Wild and Scenic River, Yosemite Valley Segment – October 2011 Outstandingly Remarkable Values	The Ahwahnee Comprehensive Rehabilitation Plan Proposed Tributary Crossings
Scenic One of the most spectacularly scenic canyons in the world, waterfalls	Visitors to Yosemite Valley experience scenic views of some of the world's most iconic scenery, with the river and meadows forming a placid foreground to towering cliffs and waterfalls.	Scenic and visual landscape elements would not be affected by the proposed actions. The final bridge design and culverts for code-compliant fire department access would be low profile, compatible with the surrounding cultural landscape, and would not be visible from the Merced River upon project completion. The utility crossing at Royal Arch Creek would not be visible upon project completion. During installation of the bridge, culverts and utility crossing, construction equipment and activity would be visible from the banks of the Merced River, resulting in a short-term visual impact.
Recreational Premier outdoor recreation area in the world, picnicking, fishing, swimming, and river rafting	Visitors to Yosemite Valley enjoy a wide variety of river-related recreational activities in the valley's extraordinary setting along the Merced River.	Recreational opportunities would not be diminished in the project area. The proposed plan would not change access to river resources, or the level of development, or visitor services in this river segment.
Fish and Wildlife Vegetation: state-listed rare species Wildlife: peregrine falcon	The meadows and riparian communities of Yosemite Valley comprise one of the largest mid-elevation meadow complexes in the Sierra Nevada.	The project will not have a long-term impact on vegetation or wildlife communities, habitat, diversity, or the river process that species depend on. Project-specific mitigation measures (see Mitigation, above) would be implemented to avoid or minimize any impacts to wildlife or associated habitat during construction. There would be no impacts on fish.

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Section 7 Determination

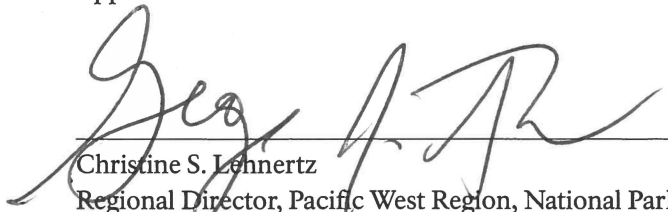
The Ahwahnee Comprehensive Rehabilitation Plan includes three actions that are located on stream tributaries to the Merced River. Two of the proposed actions are associated with code-required fire department access to the cottages: a new vehicle rated bridge on an unnamed, seasonal tributary and the upgrade or replacement of culverts on an unnamed, seasonal tributary and the perennial Royal Arch Creek. The third action is the installation of a new utility corridor along an existing path from The Ahwahnee hotel to The Ahwahnee cottages that crosses Royal Arch Creek.

Using *The Ahwahnee Comprehensive Rehabilitation Plan Environmental Assessment* as the basis for the section 7 determination and implementing specific mitigation measures (e.g., performing construction at periods of low or no water, application of construction best management practices, and seasonal species-specific restrictions for construction activities) outlined in Appendix E of the Environmental Assessment and in the Finding of No Significant Impact for the plan, the National Park Service has determined that the Selected Action will not invade the Wild and Scenic Merced River or unreasonably diminish the scenic, recreational, and fish and wildlife outstandingly remarkable values present in the area as of the date of designation.

Recommended:

 
Don L. Neubacher
Superintendent, Yosemite National Park
Date

Approved:

 
Christine S. Lehnertz
Regional Director, Pacific West Region, National Park Service
Date

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Yosemite National Park

National Park Service
U.S. Department of the Interior



The Ahwahnee Comprehensive Rehabilitation Plan

Public Comment and Response Report
November 2011



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Introduction

This report summarizes public comments submitted on *The Ahwahnee Comprehensive Rehabilitation Plan Environmental Assessment* (EA) and responses to those comments. The National Park Service released the Ahwahnee Comprehensive Rehabilitation Plan EA for public review from July 21, 2011, through August 23, 2011. Public comment letters on the proposed plan were received by mail or electronically through the Planning, Environment, and Public Comment (PEPC) website at <http://parkplanning.nps.gov/AhwahneeRehab>. This report provides a summary of public concerns expressed in those comment letters and park responses to substantive comments. Public concerns did not result in any changes to the alternatives presented in the EA or the proposed action.

Public Comment Analysis Methodology

The National Park Service reviewed and analyzed public comments received during the comment period in a series of stages. Each letter was read to determine discrete points expressed by the author, each of which was considered to be a “comment.” Each discrete comment was then coded to associate that comment with a particular resource topic or element of the Comprehensive Rehabilitation Plan (such as Purpose and Need or Alternatives).

Once all letters were coded for individual comments, similar comments were grouped together, and a “concern statement” was generated, which is intended to capture the main points or common themes expressed by the group of similar comments. The concern statements were then screened to determine whether or not further clarification was needed, or whether modification of the proposed action was necessary. No public concerns resulted in modification of the proposed action.

Lastly, the project team prepared responses to comments considered ‘substantive.’ Substantive comments are those that:

- question, with reasonable basis, the accuracy of information in the EA
- question, with reasonable basis, the accuracy of environmental analysis
- develop and evaluate reasonable alternatives other than those presented in the EA
- cause changes to the proposal or alternatives
- suggest factual corrections

All comments received during the public comment period have been duly considered by the National Park Service and are now part of the administrative record for this project. The full text of public comments can be viewed on the project website at http://www.nps.gov/yose/parkmgmt/ahwahnee_rehab.htm. Personal information included with the comments (e.g., names and contact information) has been redacted in the online version to protect authors’ privacy.

Results of Public Comment Analysis

During the 34-day public comment period, the park received 9 public comment letters from 1 tribal group, 1 agency, and 7 individuals. The analysis of these letters identified 15 discrete comments, from which 9 general concern statements were generated. Four of the concerns were identified as substantive.

Using This Report

This report presents public concerns organized by topic, along with “supporting quotes,” which are verbatim excerpts from individual public comment letters. These supporting quotes are followed by whether the comment author was an individual or an organization (with a general description of the organization type) and the assigned letter number. For example, “(Individual, #2)” is a comment from an individual who is unaffiliated with any organization and who submitted the second letter received.

Concerns that were considered substantive include a response from the project team. Substantive concerns and responses are listed first under each topic, followed by non-substantive concerns. Responses are not provided for non-substantive concerns (e.g., comments that oppose the proposed action but do not provide a substantive rationale, comments that do not meet the requirements listed above).

Following the list of public concerns and responses to substantive comments, this report also presents a short summary of comments considered beyond of the scope of this planning effort.

Public Concerns and Responses

Purpose and Need for Action

Concern 1: The National Park Service has incorrectly identified seismic stability as a needed action for the comprehensive rehabilitation plan.

“The likelihood of a significant Seismic event, in this Sierra environment, is highly unlikely. Expenditures in this area is excessive Tax spending.”

(Individual, #2)

Response: As noted in Chapter 1 of the EA, this plan conforms with the Interagency Committee on Seismic Safety and Construction Recommended Practice 6 (RP6). The RP6 was developed in conjunction with the National Institute of Standards and Technology in response to Public Law 101-614: The National Earthquake Hazards Reduction Program and Reauthorization Act and pursuant to Executive Order 12941: Seismic Safety of Existing Federally Owned or Leased Buildings. RP6 identifies the triggers for when seismic rehabilitation of federal buildings is required and provides evaluation and mitigation requirements. Per section 2.1(b) of RP6, because this plan 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 was required.

A seismic evaluation of The Ahwahnee hotel, cottages, and dormitory was performed in 2010. Results of this evaluation indicated that there are some inherent qualities of the hotel and cottages that might present safety hazards to visitors and employees in the event of a 500-year or 2,500-year earthquake as described in the “Geologic Hazards” Affected Environment section of the EA. The results of this evaluation were used to develop alternative options for meeting seismic standards. Alternatives 1 and 3 (the preferred alternative) represent the minimum amount of structural stabilization required to address seismic safety concerns and meet RP6 objectives.

Concern 2: The National Park Service has correctly identified fire/life-safety as needed actions for the comprehensive rehabilitation plan.

“Fire/life and Safety valid areas of improving existing conditions of the Ahwahnee.”
(Individual, #5)

Concern 3: The comprehensive rehabilitation plan is needed to correct deteriorating conditions at The Ahwahnee.

“While reading The Ahwahnee Comprehensive Rehabilitation Plan, I became increasingly shocked about the condition that the Ahwahnee is in. Many of the issues are not evident to a visitor and it is horrible that such an iconic building has been so poorly maintained that it has gotten to this condition.”
(Individual, #4)

Alternatives

Concern 4: The National Park Service should provide the design plans for the code-required emergency access road and culverts when they are available.

“There is one section that I would like to see more information on and that is the Code-Required Emergency Access Road and Culverts. I am concerned about the size and appearance of the bridge that might be needed and the impact of the bridge and of a larger, gravel access road would have on the scenic values of that area. I understand that more studies are needed until a design plan is decided on and I would like to be able to see those plans and what visual impacts there will be.”
(Individual, #4)

Response: Once funding becomes available for implementation of the code-driven fire access actions at the cottages, further design development will determine exact specifications for the drainage crossings and road improvements. Although it is unknown when implementation of these actions will occur, these actions will likely occur during early phases of rehabilitation as they are code-driven. Designs will be compatible with the character of the historic landscape and will be subject to review by the State Historic Preservation Officer as stipulated in the 2011 Programmatic Agreement for the plan. The designs will also be in compliance with the Merced Wild and Scenic River Comprehensive Management Plan. Updates on the implementation of The Ahwahnee Comprehensive Rehabilitation Plan will be communicated through ways such as the project website (http://www.nps.gov/yose/parkmgmt/ahwahnee_rehab.htm), the Yosemite Daily Report, and the park’s electronic planning newsletter. Additional details on the implementation of actions can also be requested by emailing YOSE_Planning@nps.gov.

Concern 5: The National Park Service has correctly identified Alternative 3 as the preferred alternative.

“I support your choice of Alternative 3 since it offers the best plan to repair and maintain one of the most beautiful buildings in the National Park system.”
(Individual, #4)

“I concur with Alternative three (3) Preferred.”
(Individual, #6)

Concern 6: The National Park Service should select Alternative 1 as the preferred alternative.

"I prefer alt 1--minimal changed.....especially visuals."
(Individual, #1)

Concern 7: The National Park Service has not properly controlled costs on the NPS-preferred alternative (Alternative 3).

"Alternative 3 (Preferred) appears to express a 'carte blanc' cost to the Ahwahnee's 'improvement'. I see no controls on expenditures, but rather an open interpretation to Rehabilitation."
(Individual, #5)

Response: The actions in the comprehensive rehabilitation plan are primarily code-driven. Alternative 3, the preferred alternative, was developed using cost as factor in selecting actions from both Alternatives 1 and 2 that would meet code requirements and provide for historic rehabilitation in a cost-effective manner.

Cultural Resources

Concern 8: The National Park Service should only reference Mono Paiute American Indian people when referring to the Ahwahneechee people.

"Regarding the Ahwahnee Comprehensive Rehabilitation Plan, as the original Native American Indian people of Yosemite we would like the inclusion of the true Ahwahneechee people, the Mono Paiute people, instead of the Southern Sierra Miwuk's who came later after 1851."

The word Ahwahnee is not a miwok word, but is a Paiute word. Ahwahnee is a part of Paiute ancestral legend."
(Tribal group, #8)

"As the real indigenous Native people of Yosemite and the true Ahwahnees we request that the Yosemite National Park Comprehensive Rehabilitation Plan not use any reference to Miwok, Mewuk or Miwuk for Ahwahnee, since the Ahwahnees were Mono Paiutes. The reference to the original indigenous Ahwahnees should only be for the Mono Paiute Indian people. All written material, pamphlets and signs should not the Mono and Paiute people as the real Ahwahnees."
(Tribal group, #8)

Response: The EA provides an ethnographic background for the project area that focuses more generally on the significance of the area to "American Indian tribes and groups." The Ahwahnee Comprehensive Rehabilitation Plan does not address details concerning which tribe or tribal groups were present at specific times or places, or details of their practices. The park consults with seven culturally associated American Indian tribes and groups on a regular basis. As listed in Chapter 4 of the EA, these seven tribes and groups include the American Indian Council of Mariposa County (also known as the Southern Sierra Miwuk Nation), Bishop Paiute Tribe, Bridgeport Paiute Indian Colony, Mono Lake Kutzadikaa Tribe, North Fork Rancheria of Mono Indians, Picayune Rancheria of the Chukchansi Indians, and the Tuolumne Band of Me Wuk Indians. Consultation with these tribes and groups regarding this planning effort was initiated in September 2009 and will continue as specified in the 2011 Programmatic Agreement for the Comprehensive Rehabilitation Plan.

Wildlife

Concern 9: The National Park Service should proceed with the comprehensive rehabilitation plan in a manner that is protective of the park's environment and wildlife.

“It is important to proceed with this project in a way that is the least detrimental to the Yosemite environment and wildlife. Preserving the historical integrity of the Ahwahnee Hotel is equally important.””

(Individual, #5)

Out of Scope Comments

Some comments were expressed that were not within the scope of this plan; therefore, they are not cited in this report. All comments were considered by park staff, and were forwarded to the appropriate personnel for consideration. Out of scope topics included:

- changes to day or overnight use
- retail operations at The Ahwahnee

The full text of all public comment letters is available for review on the project website at:

http://www.nps.gov/yose/parkmgmt/ahwahnee_rehab.htm.

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Yosemite National Park
P.O. Box 577
Yosemite, CA 95389

www.nps.gov/yose/

As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public land and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is on the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

