

ANSEL ADAMS GALLERY COMPLEX REHABILITATION

FINDING OF NO SIGNIFICANT IMPACT
JUNE 2014

YOSEMITE NATIONAL PARK

Ansel Adams Gallery Complex Rehabilitation

Finding of No Significant Impact June 2014

INTRODUCTION

The Ansel Adams Gallery complex is located in Yosemite National Park adjacent to the Visitor Center in Yosemite Valley. The buildings that comprise the Ansel Adams Gallery complex include the Gallery (Building 900A) and Family Residence (Building 900B), the Darkroom (Building 901), the Duplex (Building 902), and the Upper Residence (Building 904). The Ansel Adams Gallery complex is a contributing resource to the following two historic districts listed in the National Register of Historic Places: the Yosemite Village Historic District (listed in 1978) and the Yosemite Valley Historic District (listed in 2006). In addition, the four buildings are located within an archeological site complex (CA-MRP-56/H) which contributes to the Yosemite Valley Archeological District.

The Ansel Adams Gallery Complex Rehabilitation project is intended to improve the living and working environment for staff, and preserve the historic integrity of the site and its connection to acclaimed photographer and conservationist Ansel Easton Adams. The National Park Service (NPS) prepared an environmental assessment (EA) to satisfy the requirements of the National Environmental Policy Act (NEPA) and the National Historic Preservation Act. This Finding of No Significant Impact documents the decision of the National Park Service to adopt a plan for the major repair and rehabilitation of the four buildings and associated landscape comprising the complex, and the determination that no significant impacts on the human environment are associated with that decision.

PURPOSE AND NEED

The Ansel Adams Gallery buildings have maintained the same commercial and residential uses since their construction in the mid-1920s. After over 90 years of continuous operation and occupation, the Ansel Adams Gallery buildings are in need of major repair and rehabilitation. A condition assessment of the facilities identified the need for rehabilitation, repair, replacement, and/or improvement of structural, mechanical, electrical, and underground utility components, and rehabilitation of deteriorated historic features and finishes. In addition, opportunities to improve accessibility and energy efficiencies have been identified. Minor upgrades and repairs have been made since the condition assessment; however, substantial repairs remain in order to rehabilitate the buildings and attain policy objectives for fire/life safety and accessibility, while still preserving the historic character of the buildings.

A comprehensive plan for rehabilitation and improvement of the Ansel Adams Gallery complex is needed to:

- Correct building structural deficiencies, and improve their stability and longevity;

- Improve accessibility and fire/life safety;
- Protect and preserve cultural and historic resource integrity and character;
- Improve envelope weather-proofing and thermal performance;
- Improve site access, circulation, and drainage; and
- Replace aging and failing building and underground site utility systems.

SELECTED ACTION AND RANGE OF ALTERNATIVES CONSIDERED

The Ansel Adams Gallery Complex Rehabilitation EA, dated April 2014, describes and analyzes four alternatives, including a No Action Alternative (Alternative 1) and the following three action alternatives:

- Alternative 2: Conservation
- Alternative 3: Building Performance
- Alternative 4: Balanced Rehabilitation (Preferred Alternative)

These alternatives represent a reasonable range of options to satisfy the purpose of and need for the project, while meeting relevant legal requirements.

Selected Action: Balanced Rehabilitation

The Selected Action is the same as described as Alternative 4, the Preferred Alternative, in the EA. The Selected Action balances conservation of historic fabric and optimization of building performance. Under this alternative, the NPS will rehabilitate the Ansel Adams Gallery complex using architectural and structural design tailored to improve building performance and retain historic integrity. Concessioner will be temporarily displaced during the rehabilitation, and NPS will continue to work with the concessioner regarding housing arrangements.

Table 1 lists the actions, by project category, under the Selected Action. The project categories (Fire Protection and Life Safety; Energy Conservation and Building Performance; Accessibility; Seismic Safety and Structural Integrity; and Utilities, Site Circulation and Drainage) guided the development of the alternatives and ensured that the objectives of the rehabilitation will be addressed.

TABLE 1. SUMMARY DESCRIPTION OF THE SELECTED ACTION BY PROJECT CATEGORY

Component	Action Description
FIRE PROTECTION AND LIFE SAFETY	
Fire Suppression	For all buildings, install a fire suppression system.
Fire Detection and Egress	Install hard wire fire detection alarm and illuminated exit sign in lower level of Gallery.
ENERGY CONSERVATION AND BUILDING PERFORMANCE	
Doors/Windows	For all buildings, retain and repair when necessary if in repairable condition, otherwise replace in kind; add weather stripping and new glazing putty.
Exterior Wall Improvements	For Buildings 902 and 904, remove and replace all shingles to match existing. For Building 900B, remove and salvage shingles on east and north elevations and replace in kind; use salvaged shingles to replace damaged shingles on west elevation. For all three buildings, add structural plywood, batt insulation, building paper, and window and door strapping and blocking where siding is entirely removed.
Roof Covering Treatment	Replace in kind (wood shakes at 901 and 902, asphalt shingles at 904, and flat roofs of Building 900A).
Insulation	For Buildings 900A, 900B, 902, and 904, install insulation in ceilings, walls, and floors that have accessible crawlspace areas.

Component	Action Description
Lighting	Install lamps and fixtures where necessary, consistent with the period of significance to attain energy conservation goals.
ACCESSIBILITY	
Gallery (Building 900A) Path of Travel	Raise existing walkway grades to the porch and replace to an accessible width.
Gallery (Building 900A) South Entrance Threshold	Raise existing wood deck of porch to provide level threshold.
Gallery (Building 900A) Restroom	Expand restroom into fine print room, removing janitorial closet and space used for safe.
Darkroom (Building 901) Path of Travel	Establish a raised grade walkway from accessible parking and add a ramp with handrails at the entrance. Raise grade elevations of the courtyard to eliminate a step from path along the east side of building.
Darkroom (Building 901) Restroom	Remove north and east walls of existing restroom and build new wall 1 foot to the east; access restroom entrance on east wall.
Accessible Parking	Establishment of an accessible parking space in the parking area behind the Darkroom.
Employee Residence (Building 902)	Do not modify to be an accessible employee residence. No access from parking area provided.
SEISMIC SAFETY AND STRUCTURAL INTEGRITY	
Foundation Improvements	Buildings 900B, 902, 904 will include installation of new insulated, reinforced concrete grade beams and cripple wall construction using shallow footings and sill plates anchored to either the new grade beams or the existing rock. Additionally, providing a foundation of blocks or existing rock to existing interior posts and one row of new posts to the foundation, and anchoring the posts to the foundations. Work space to undertake the foundation improvements will be provided by excavating along the perimeter of the building.
Floor Repair and Improvements	For Buildings 900A, 900B, 902, and 904, repair and replace in kind existing wood joists and wood floors. In areas where floor joists rest on soil, perform minor excavation to achieve clearance. In areas with access to crawlspace, repair existing wood floors where necessary, and add insulation and rodent protection.
Seismic and Wind Load Protection	Shear wall construction will be added to Buildings 900A, 900B, 902, and 904; light moment frame will be added to Buildings 900A and 904.
Roof Improvements	Strengthen roof rafters of Buildings 900A, 900B, 902, and 904 by supplementing existing trusses; add pony wall construction where needed.
Gallery (Building 900A) Porch Canopy – log poles and glu-lam beams	Repair and treat log poles and glulam beams. Add copper flashing caps to ends of glulam beams.
Chimney Strengthening	Rebuild Building 900A chimney from roof line up using existing stone after adding grouted steel flue; install grouted steel flue in Building 904 chimney; tuck-point mortar and repair flashing of both chimneys.
Upper Residence (Building 904) North Kitchen – damaged wall	Replace in kind the insect-damaged framing and sheathing of wall in north kitchen.
Covered Walkway	The covered walkway on the west side of Building 900B, reconstruction of deck foundation structural members to avoid contact with bedrock mortar
UTILITIES, SITE CIRCULATION AND DRAINAGE	
Mechanical – air circulation	For all buildings, install exhaust fans in bathrooms.
Mechanical – air circulation	For Buildings 900B, 902, and 904, install range hood and exhaust fan in kitchens.
Mechanical – space heating	For Buildings 902 and 904, install new condenser unit, electric heater, and heat pumps with evaporators in each residential unit.
Mechanical – piping and fixtures	For all buildings, replace existing plumbing with modern materials and equipment.

Component	Action Description
Mechanical – water heaters	For all buildings, install seismic straps, backflow preventers, and expansion tanks for water heaters.
Electrical – building distribution system	For Buildings 900B, 902, and 904, replace existing electrical distribution system with new, modern system.
Electrical – service connection and transformer	For Building 900A, replace the existing electrical service panels, subpanels, and isolation transformer; remove abandoned wiring and replace deficient wiring.
Historic Light fixtures	For all buildings, retain existing historic light fixtures where feasible and necessary, otherwise replace fixtures with pieces consistent with the historic character of the period of significance.
Electrical – propane fired generator	Relocate the propane tank and generator east of the Darkroom (Building 901).
Duplex Residence (Building 902) East Kitchen Relocation	Relocate kitchen in east unit. Relocate the existing entrance door in the location of an earlier door to facilitate new kitchen location. Build new wood porch and stairs with handrail to relocated entrance.
Underground Utilities	Replace failing sewer section under Building 900A and between Buildings 901 and 902. Replace electrical distribution system with overhead electrical lines. Relocate Building 902 sewer and electric service connections using a more direct alignment.
Site Circulation	Improve only the existing walkway on the west side of Building 900A, extending it further north and relocate the gate to redirect foot traffic away from a sensitive resource and provide access between Buildings 900A and 901 that meets building code. Relocate upper section of east pathway to the east over a terraced area and around an old black oak. Relocated path includes using steps and a handrail at the rock revetment leading up to Building 901. Lower section of pathway will remain an informal path.
Site Circulation	Relocate upper section of east pathway to the east over a terraced area and around an old black oak. Relocated path includes using steps and a handrail at the rock revetment leading up to Building 901. Lower section of pathway will remain an informal path.
Site Drainage	During site construction or ground disturbance, including foundation strengthening, underground utility work, and installation of site drainage improvements, measures will be taken to preserve and protect the site's bedrock mortars and an old black oak tree on the east side of Building 900B.
Site Drainage – runoff	Construct swale behind Buildings 900B, 901 and the north side of Building 900A.
Site Drainage – down drains	Install splash blocks at all down drains.
Site Drainage Improvements	Site drainage improvements, where needed, will be made in conjunction with building foundation construction. Where roof drainage is discharged from leaders, water will be diverted from building foundations using a combination of concrete diverters and soil surface re-grading.
Site Drainage – storm drains	Connect storm drain behind Building 900B to existing storm drain and install a cleanout.

Other Alternatives Considered and Analyzed

Alternative 1: No Action Alternative. The No Action Alternative is required by the NEPA 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 Ansel Adams Gallery complex would continue. Actions designed to address structural deficiencies, protect cultural and historic resources, improve accessibility and fire/life safety, and enhance building conditions for visitors and staff are included in the action alternatives, but are not considered part of the No Action Alternative for the purposes of this assessment.

Alternative 2: Conservation. Alternative 2 proposed retaining distinctive historic fabric and features throughout the Ansel Adams Gallery complex while correcting major structural deficiencies. This alternative focused on preservation and repair of existing fabric and intact character-defining features. Elements too deteriorated to be repaired and retained would be replaced in kind. Major components identified as being structurally deficient will be strengthened under this alternative, but seismic and wind load protection of exterior walls would not be included. Existing materials, windows, and doors of exterior walls would be retained to the greatest possible extent, only replacing elements when beyond repair while making building thermal performance improvements where possible. Only necessary accessibility, safety, and site circulation and drainage improvements would be made. A failing sewer section would be replaced, but existing underground utilities would be maintained.

Alternative 3: Building Performance. Alternative 3 would maximize building performance by providing a higher degree of seismic safety and energy efficiency than Alternative 2 while rehabilitating historic fabric. Additional seismic construction and energy efficiency elements for this alternative would result in replacement of some intact historic building materials and elements with new ones that reproduce the historic appearance of the buildings. In addition to necessary improvements in accessibility, safety, and site circulation and drainage as shown for Alternative 2, Alternative 3 would also take a greater level of intervention in the site to retrofit a residence to make it accessible to the greatest extent possible, and to provide full site circulation and drainage improvements to ensure safe foot travel throughout the site and prevent water damage. Also, the existing underground sewer and electric utilities would be replaced.

Alternatives Considered but Dismissed. The NPS considered a range of actions when developing possible alternatives for the rehabilitation of the Ansel Adams Gallery complex. Table 2 lists the actions that were considered, and dismissed because they did not fully satisfy the objectives of this planning effort.

TABLE 2. ACTIONS CONSIDERED BUT DISMISSED

Action Considered	Reason Dismissed
ACCESSIBILITY	
Raise existing paved walkway to the porch and add an interior ramp between the lower and upper levels of the Gallery (Building 900A)	Adding an interior ramp would adversely affect the Gallery's historic integrity and character. Less historically intrusive options are available.
Provide west exterior pathway between upper and lower gallery areas with an inclined path and a canopy.	Adding a canopy to the gallery would adversely affect the historic integrity. Less historically intrusive options are available.
Add a chair lift between the lower and upper Gallery retail areas.	Adding a chair lift would affect the Gallery's historic integrity and character. Less historically intrusive options are available.
SEISMIC SAFETY AND STRUCTURAL STRENGTHENING	
Brace stone chimneys of Buildings 900A and 904 with exterior steel angle collars.	This action would cause unnecessary loss of historic integrity. Other less visually intrusive measures are available.
Fill flues of chimneys of Buildings 900A and 904 with grout and rebar.	This action is non-reversible and both chimneys would lose functionality, causing unnecessary loss of historic integrity. Less historically intrusive options are available.

One issue identified during the public scoping period for the proposed action was whether the residences (Buildings 902 and 904) could be restored and used for a museum or meeting

space/workshop center. This option is not feasible, as the NPS is contractually obligated to maintain Buildings 902 and 904 as residences.

ENVIRONMENTALLY PREFERABLE ALTERNATIVE

The Council on Environmental Quality (CEQ) regulations implementing the NEPA and the 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 section 101 of the NEPA. 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 the 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.

The Selected Action will best fulfill the responsibilities of the National Park Service to identify the alternative that will promote national environmental policy as expressed in section 101 of the NEPA.

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

Alternatives 2, 3, and 4 would all meet the above criteria, as they would each provide substantive compliance with accessibility requirements, provide historic rehabilitation work that is needed to maintain and protect the historic integrity of the Ansel Adams Gallery complex, provide increased energy efficiencies, and enhance building performance and site functions for visitors and staff. Alternative 2 would best meet criterion 4, as it proposes the minimal scheme to address accessibility and energy conservation issues, and adopts the least invasive means of meeting project objectives. Alternative 3 would best meet criterion 6 as it provides the most substantive accessibility compliance and highest degree of energy efficiencies and building performance.

Alternative 4, the Selected Action, will best meet criteria 1, 2, 3, and 5 because it incorporates many of the increased energy efficiencies and much of the accessibility compliance and building performance of Alternative 3 with minimally invasive options of Alternative 2. Alternative 4 provides the maximum feasible protection and preservation of the historic properties (historic buildings and their designed landscape, and archeological resources) while meeting plan objectives for public and employee safety, structural stability, energy efficiency, and visitor experience.

WHY THE SELECTED ACTION WILL NOT HAVE A SIGNIFICANT EFFECT

In regards to the criteria for determining significance addressed within 40 CFR 1508.27, no significant direct, indirect, or cumulative environmental impacts will occur as a result of implementing the Selected Action. Table 3 presents a summary of all foreseeable impacts of the Selected Action.

TABLE 3. SUMMARY OF IMPACTS OF SELECTED ACTION

Impact Topic	Selected Action
Historic Sites, Buildings, and Landscapes	The Selected Action will result in no adverse effect on historic properties. Minor alterations (removal of one contributing circulation feature) will not substantially alter characteristics of the historic property that qualify it for inclusion in the National Register in a manner that will diminish the integrity of the property's design, setting, materials, workmanship, feeling, or association.
Archeological Resources	Actions that will cause ground disturbance, including improvements to accessibility, structural strengthening, and improvements to utilities and site drainage, will affect archeological resources in archeological site CA-MRP-56/H within the Yosemite Valley Archeological District. Ground disturbance in site areas with dense and intact deposits will be avoided; therefore, these effects will not be adverse. The NPS will conduct archeological monitoring of all ground-disturbing activities associated with the rehabilitation work to avoid the potential for adverse effects to archeological deposits of site CA-MRP-56/H. American Indian tribal cultural monitors will participate to address the traditional cultural aspects of significance of archeological resources.
American Indian Traditional Cultural Resources	Bedrock mortars and the black oak will be protected during all construction activities. Existing impacts to bedrock mortars will be corrected by rerouting an existing path that crosses a bedrock mortar, by removing the existing foundation post from atop another feature under the Gallery deck and spanning it with a new post and pier design, and implementing other measures to protect bedrock mortars recommended in consultation with traditionally associated tribes and groups. Other traditional cultural resources of value to American Indians may potentially be affected during construction. The park will continue consultation with traditionally associated American Indian tribes and groups during project planning and implementation, and will involve a tribal cultural monitor during all ground-disturbing activities associated with the rehabilitation work to avoid adverse effects to historic properties with religious and cultural significance.
Wildlife	Temporary disturbance from construction activities (noise, increased human presence, increased vehicular traffic, and equipment use) will result in local, short-term, minor to moderate adverse impacts to wildlife and sensitive species habitat and populations. A wildlife biologist will do an inspection for bats prior to removing structure siding.
Visitor Experience	Several long-term beneficial impacts on visitor experience and visitor safety will occur. Proposed fire/life-safety improvements and comprehensive seismic and structural stability improvements will result in long-term beneficial impacts on visitor safety. The rehabilitation of the Gallery and Darkroom will provide comprehensive accessibility improvements. In addition, rehabilitation of historic features and fabric will enhance the visitor experience.
Park Operations	The proposed fire/life-safety improvements will result in long-term beneficial impacts on park operations including visitor safety. Comprehensive accessibility improvements will allow access for visitors and staff. The installation of insulation, weatherizing existing doors and windows, and upgrades to utilities systems will result in a notable decrease in energy consumption. Historic rehabilitation of historic features and implementation of comprehensive site drainage improvements will decrease future maintenance and repair costs.

CUMULATIVE IMPACTS

The analysis of cumulative impacts in the *Ansel Adams Gallery Complex Rehabilitation Environmental Assessment* did not identify any significant cumulative impacts. Past projects at the Ansel Adams Gallery complex and other Yosemite Valley facilities have improved existing facilities and improved living conditions for the residents. Rehabilitation and improvement actions associated with present plans and projects do not propose any additional actions to the Ansel Adams Gallery complex.

However, these projects/plans, when combined with the Selected Action, cumulatively will result in an adverse effect on the Yosemite Valley Historic District and the Yosemite Village Historic District to which the Ansel Adams Gallery complex contributes. Additionally, cumulative impacts of past, present, and reasonably foreseeable future projects may result in adverse effects to the Yosemite Valley Archeological District. In general, past development, operation, and maintenance projects have resulted in additional ground disturbance and impacts to the integrity of archaeological sites, including site CA-MRP-56/H and the Yosemite Valley Archeological District, and the values held by American Indians. Adverse impacts resulting from cumulative projects will be resolved through existing agreements and 36 CFR Part 800.

Cumulative impacts from past and present actions combined with the Selected Action will have local, short-term, negligible to minor, adverse impacts on wildlife and sensitive species habitat and populations. The Selected Action combined with past and present actions cumulatively will have local, short-term, minor, adverse impact and a local, long-term, minor to moderate, beneficial impact on visitor experience and on park operations.

Mitigation Measures

The National Park Service places a strong emphasis on avoidance, minimization, and mitigation of impacts. To help ensure that field activities associated with the *Ansel Adams Gallery Complex Rehabilitation* protect natural, cultural, and social resources and the quality of the visitor experience, mitigation measures have been developed. Table 4 presents some specific mitigation measures that will be implemented prior to, during, and after construction of the proposed improvements.

Table 4 - Mitigation Measures

Mitigation Measure	Responsibility
CONSTRUCTION MEASURES	
Implement compliance monitoring to ensure that the project remains within the parameters of the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA) compliance and decision documents.	Project Manager, Contractor
HISTORIC PROPERTIES	
The determination of "No Adverse Effect" on the historic structures on the site is contingent on continuing consultation with the park historical architect for later planning and design phases. Construction monitoring and observation by the park architect should continue throughout all phases of construction.	Project Manager working with the park Historical Architect
ARCHEOLOGICAL RESOURCES	
Archeologists will monitor ground-disturbing actions to avoid adverse effects to archeological values.	Project Manager, working with Park Archeologist
ETHNOGRAPHIC RESOURCES	
All actions involving ground disturbance within or adjacent to the boundaries of known ethnographic resources (including archeological sites) shall be conducted with a tribal monitor present to ensure that construction actions do not adversely affect resources with religious or cultural significance.	Project Manager working with the park American Indian Liaison
The NPS will continue to consult with traditionally associated American	Project Manager working with

Mitigation Measure	Responsibility
Indian tribes and groups throughout the project to ensure protection and appropriate treatment of American Indian traditional resources.	the park American Indian Liaison
WILDLIFE	
The 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).	Project Manager working with the park wildlife biologist

PUBLIC INVOLVEMENT

The formal public scoping period for the *Ansel Adams Gallery Complex Rehabilitation* EA began on July 20, 2011, and ended September 2, 2011. The park held two public open houses at the Visitor Center Auditorium in Yosemite Valley from 1 p.m. to 4 p.m. on July 20, 2011, and August 31, 2011. Members of the public were invited to submit comments by mail, fax, email, through the Planning, Environment, and Public Comment (PEPC) system, and/or on comment forms that were made available during the public open houses. The project was presented to a live and web audience. During the 45-day public scoping period, the park received a total of nine letters from seven individuals, generating 13 individual substantive comments. The following issues and concerns were identified during the public scoping process:

- Safety improvements are necessary including pathways.
- Increase energy efficiency by replacing windows and doors, upgrading plumbing, and improving the mechanical systems.
- Use restored residences for a museum or meeting space/workshop center.
- Need back up power supply such as a permanent generator.
- Concern for the potential impact to American Indian resources.
- Concern that repair and rehabilitation will lessen the building's historic character.

The public review period for the EA ran from April 16, 2014, to May 16, 2014. The document was available through the PEPC website (<http://parkplanning.nps.gov/AnselAdamsEA>) and hardcopies were available as requested. Approximately 32 hardcopies were distributed to individuals, agencies, tribes and groups, and organizations. In addition to being available at the Yosemite National Park Archives and Research Library, hardcopies were also provided to the following California libraries for public review: Bassett Memorial Library in Wawona, Mariposa County Public Library, El Portal Public Library, and Oakhurst Public Library. Comments on the EA could be submitted online through the PEPC website and by U.S. mail and fax. The public review period was announced in a 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 30-day public comment period, the park received three comments from one individual, one organization (Central Sierra Environmental Resource Center), and one agency (Mariposa County Planning Commission). All three comments received supported the proposed action and/or the preferred alternative.

AGENCY CONSULTATION

California State Historic Preservation Officer and the Advisory Council on Historic Preservation

The NPS Initiated consultation with the State Historic Preservation Officer (SHPO) in September 2011 in accordance with the park's *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* (NPS 1999). Because of the importance of the project, the SHPO requested the NPS consult in accordance with the standard section 106 review process (36 Code of Federal Regulations [CFR] Part 800), to which the park agreed.

The NPS initiated consultation with the Advisory Council on Historic Preservation (ACHP) in November 2011. The ACHP requested they be notified in the event of a determination of adverse effect for the project and be provided adequate documentation for review; the Council otherwise did not participate in the consultation process.

In November 2011, the NPS requested the concurrence of the SHPO on the proposed area of potential effects (APE) and identification and evaluation of historic properties. The SHPO concurred with the proposed APE in December 2011, but requested a fuller description of the undertaking, clarification on the identification and evaluation of historic properties, and a copy of the project schematic design drawings. The NPS submitted revised descriptions of the undertaking, identification of historic properties including those resources with religious or cultural significance, and evaluation of historic significance for SHPO review and concurrence to the SHPO in February 2012. In addition, the park also provided the SHPO with the Ansel Adams Gallery 95% draft Historic Structures Report and 95% draft Cultural Landscape Report. In April 2012, the NPS submitted the 75% site design drawings and interim archeology report for SHPO consideration and review.

The SHPO concurred with the identification of historic properties in November 2012. At this time, the SHPO also provided comments on the schematic design, including options related to exterior envelope, fire/life/safety, accessibility, and utility system improvements.

In February 2014, the NPS requested SHPO's concurrence on the park's no adverse effect determination and review of the 80% construction documents. This correspondence included responses to SHPO comments on the schematic design documents and transmitted the *Final Archeological Testing and Evaluation for the Ansel Adams Gallery Complex Rehabilitation*. SHPO concurred with the park's no adverse effect assessment in a letter dated June 11, 2014.

American Indian Tribes and Groups

The NPS initiated consultation with traditionally associated American Indian tribes and groups for the Ansel Adams Gallery Complex Rehabilitation in July 2011. Tribes and groups contacted included the federally recognized Tuolumne Band of Me-Wuk Indians, the federally recognized Bishop Paiute Tribe, the federally recognized North Fork Rancheria of Mono Indians of California, the federally recognized Bridgeport Indian Colony, the Mono Lake Kutzadika^a Tribe, the federally recognized Picayune Rancheria of the Chukchansi Indians, and the American Indian Council of Mariposa County, Inc. In October 2011, NPS staff met with a Picayune Rancheria of Chukchansi Indians representative to review drawings for the proposed utility work and to respond to questions received from the tribe. All of the tribes were invited to an informational meeting and site visit in Yosemite Valley, which was held on January 5, 2012.

In October 2012, the NPS provided American Indian tribes and groups a copy of the draft research design for the archeological investigation of the Ansel Adams Gallery site. A representative of the American Indian Council of Mariposa County, Inc. participated in the archeological excavations as a tribal cultural monitor, and all seven tribes and groups received both draft and final versions of the

archeological report. The park received a letter on February 25, 2013 from the North Fork Rancheria of Mono Indians of California requesting a Native American monitor be present during all ground disturbing activities during the project. The seven American Indian tribes and groups were also provided copies of the Value Analysis report and 80% construction documents in February 2014 for review and comment.

The traditionally associated American Indian tribes and groups received copies of the *Ansel Adams Gallery Complex Rehabilitation Environmental Assessment* for review and comment during the public review period. A tribal site visit was held on June 19, 2014 to discuss the final rehabilitation and construction plans.

Consultation and partnering will continue throughout the planning and implementation of the Ansel Adams Gallery complex rehabilitation project.

U.S. Fish and Wildlife Service

The Endangered Species Act of 1973, as amended (16 United States Code [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 NPS obtained a list of federally listed endangered and threatened species that may be present in the Ansel Adams Gallery complex project area in December 2011 from the U.S. Fish and Wildlife Service. No federally listed threatened or endangered species, candidate species, or designated critical habitats occur within the project area.

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CONCLUSION

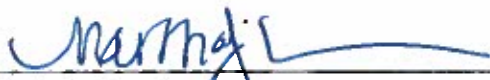
Based on the information contained in the *Ansel Adams Gallery Complex Rehabilitation Environmental Assessment* as summarized above, the minimal nature of comments received from affected agencies and the public, and the commitment to conduct archeological monitoring of all ground-disturbing activities associated with the rehabilitation work, it is the determination of NPS that the Selected Action is not a major federal action significantly affecting the quality of the human environment.

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.

Recommended:


Don L. Neubacher
Superintendent, Yosemite National Park
Date 6/27/14

Approved:


for Christine S. Lehnertz
Regional Director, Pacific West Region, National Park Service
Date 7/8/14

REHABILITATION OF ANSEL ADAMS GALLERY

DETERMINATION OF NO IMPAIRMENT OF PARK RESOURCES

Pursuant to the 1916 Organic Act, the National Park Service (NPS) has a responsibility to manage national parks and “conserve the scenery and the natural and historic objects and the wildlife therein and provide for the enjoyment of future generations.” Congress has given NPS management discretion to allow impacts within parks, but that discretion is limited by the statutory requirement that the NPS must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. Because that mandate is compatible with the NPS mission and is generally enforceable by the federal courts, NPS cannot take an action that will “impair” park resources or values.

The impairment that is prohibited by the Organic Act and the General Authorities Act is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values. Whether an impact meets this definition depends on the particular resources and values that would be affected; the severity, duration, and timing of the impact; the direct and indirect nature of the impact; and the cumulative effects of the impact in question and other impacts.

An impact would likely constitute impairment to the extent that it:

- affects a park resource or value whose conservation is necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park or,
- is key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
- is identified in the park’s general management plan or other relevant NPS planning documents as being significant.

An impact would likely not constitute impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values, and it cannot be further mitigated. An impact that might lead to impairment could result from visitor activities; NPS administrative activities; or activities undertaken by concessioners, contractors, and others operating in the park. Impairment may also result from sources or activities outside the park.

The *NPS Management Policies 2006* requires analysis of potential effects to determine whether or not actions would impair park resources. Park resources and values that are subject to the no-impairment standard include:

- park scenery, natural and historic objects, and wildlife and the processes and conditions that sustain them, including, to the extent present in the park, the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both during the daylight period and at night; natural soundscapes and smells; water and air resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structures, and objects; museum collections; and native plants and animals;
- appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;

- the park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and
- any additional attributes encompassed by the specific values and purposes for which the park was established.

Resources evaluated in the *Ansel Adams Gallery Complex Environmental Assessment* that were evaluated for potential impairment due to implementing the Selected Action include historic properties, archeological resources, American Indian traditional cultural resources and practices, wildlife, visitor experience and park operations.

Historic Properties

The Ansel Adams Gallery Complex (the Gallery), originally known as Best's Studio, was designed by Daniel Hull and completed in 1925. It is located along the main pedestrian corridor between the Valley Museum and the Valley Visitor and the Post Office. The Gallery is a contributing resource to two historic districts that are listed in the National Register of Historic Places: the Yosemite Village Historic District (listed in 1978), and the Yosemite Valley Historic District (listed in 2006). In addition, the four buildings that make up the Gallery complex are located within an archeological site (CA-MRP-56/H) that contributes to the Yosemite Valley Archeological District (listed in 1978). A 1995 National Register amendment to the Yosemite Village Historic District established the significance of the Ansel Adams Gallery complex in the areas of art and conservation under Criteria A and B for its association with Ansel Adams, his photography, and his conservation work. The amendment defined the period of significance of the gallery facilities as 1937, the year Ansel and Virginia Adams moved to Yosemite, to 1981, the year Ansel Adams held his last photographic workshop at the site. The amendment indicated the property also meets Criteria Consideration G, achieving significance within the past 50 years, because it had the longest and probably greatest association with Ansel Adams and his career.

The 1985 *Best's Studio, Yosemite National Park: Historic Structures Report* (1985 HSR) recommended preservation as the standard for treatment, including restoration to the pre-1969–71 condition. A new Historic Structures report completed in 2012 (ARG 2012) identifies rehabilitation of the buildings comprising the Ansel Adams Gallery as the recommended treatment in light of the 1995 amendment to the Yosemite Village Historic District. The amendment identifies the Gallery buildings as being historically important for their association with Ansel Adams and extended the period of significance of the complex from 1951 to 1981, the year that he taught his last photography class in Yosemite Valley. This change conveyed significance upon the alterations and additions to the Best Studio carried out by Adams and his wife Virginia from 1969 to 1971. This has resulted in the change of focus of the current project from restoration and preservation to rehabilitation.

The Selected Action will result in no adverse effect on historic properties associated with the Ansel Adams Gallery complex. Minor alterations (removal of one contributing circulation feature) will not substantially alter characteristics of the historic property that qualify it for inclusion in the National Register in a manner that will diminish the integrity of the property's design, setting, materials, workmanship, feeling, or association.

Therefore, the project will not impair historic resources.

Archeological Resources

The archeological area of potential effects (APE) was defined for this project in accordance with the implementing regulations for Section 106 of the National Historic Preservation Act (NHPA). The APE for the rehabilitation project is the Yosemite Valley Archeological District.

Because the Gallery site is known to have archeological resources, archeological testing and evaluation were done for the portion of CA-MRP-56/H within the footprint of the planned rehabilitation improvements for the Gallery. Archeological investigations included ethno-historic research, systematic surface pedestrian survey, and test excavations focused on areas of subsurface disturbance for the rehabilitation project, such as foundation footings, path construction, and utility lines. These investigations revealed several sites within the project area that retain integrity and possess archeological data potential capable of yielding important scientific information. Tribal consultation confirmed that these resources have cultural and religious significance.

Four portions of CA-MRP-56/H contain deposits that do not contribute to scientific understanding because they lack sufficient integrity. In addition, historic-era deposits identified during the archeological investigations lack sufficient integrity or information potential, such that they are not considered contributing elements of the Yosemite Valley Historic District.

Work related to the rehabilitation project that might affect the archeological resources include ground disturbing activities such as excavation for footings or foundation repair and grading and trenching for utility lines or improvements to on-site drainage features.

The majority of actions related to the Gallery Rehabilitation project will not affect archeological resources because they will take place inside the building. In addition, the project will include mitigation measures to avoid or reduce the impacts to archeological resources. For example, the NPS will conduct archeological monitoring of all ground-disturbing activities associated with the rehabilitation work to avoid adverse effects to archeological deposits of site CA-MRP-56/H. American Indian tribal cultural monitors will participate to address the traditional cultural aspects of significance of archeological resources.

Additional consultation with the SHPO during the planning process resulted in identification and adoption of several additional measures to avoid impacts to archeological resources. Those actions included realignment of the sewer line in order to avoid archeological resources, use of geo-textile fabric under accessible parking spaces that are located on archeological sites, and adjustments to the design of the foundation supports so they do not rest on bedrock mortars.

As a result, the project will not impair archeological resources.

American Indian Traditional Cultural Resources

The Ansel Adams Gallery complex is within the large archeological site complex recorded as CA-MRP-56/H. This site complex encompasses the Ah'wah'ne and Yo-watch-ke historic Indian villages and traditional resource gathering areas (Darko and Buettner 2011). The bedrock mortars within the rehabilitation project area are tangible evidence of subsistence practices in the villages, and they remain spiritually and culturally significant features for the present-day American Indian community associated with Yosemite Valley (Schneider *et al.* 2012). The larger CA-MRP-56/H also includes historic and prehistoric American Indian burials (Darko and Buettner 2011).

A black oak on the east side of Building 900B is another traditional cultural resource in the rehabilitation project area. Native inhabitants of Yosemite Valley used its abundant plant resources, including nuts, roots, seeds, and berries. Acorns, in particular, were an important plant food used by the Indians of Yosemite (Hull *et al.* 1995). During an informational meeting and site visit of the Ansel Adams Gallery complex on January 5, 2012, tribal representatives expressed concern for protecting the black oak.

Bedrock mortars and the black oak will be protected during all construction activities. Existing impacts to bedrock mortars will be corrected by rerouting an existing path that crosses a bedrock mortar, and by removing the existing foundation post from atop another feature under the Gallery deck and spanning it with a new post and pier design. The park has implemented, to the greatest extent possible, mitigation measures to avoid cultural resources. The park will continue consultation with traditionally associated American Indian tribes and groups during project planning and implementation, and will involve a tribal cultural monitor during all ground-disturbing activities associated with the rehabilitation work to avoid adverse effects to historic properties with religious and cultural significance.

Implementation of the Selected Action will not result in impairment of American Indian Traditional Cultural Resources.

Wildlife

The park supports a variety of wildlife in a range of habitats. Species vary with the types of vegetation that occur in a given area. The Ansel Adams Gallery Complex is located in an area of mixed conifer and black oak woodland habitat. No federally listed threatened or endangered species, candidate species, or designated critical habitats occur within the project area.

Because of its location between the Valley Visitor Center and the Village Store, the area is subject to high levels of disturbance from foot traffic and normal park operations. Also, much of the area surrounding the Gallery already developed and generally only supports birds and smaller mammals as resident species, with larger species of wildlife such as deer and bear occasionally using the area for foraging.

Potential nesting and foraging habitat for pallid bats (*Antrozous pallidus*) occurs within the project area. Anthropogenic structures in the project area may also provide nesting habitat for multiple bat species including the California myotis (*Myotis californicus*) and big brown bat (*Eptesicus fuscus*).

The Selected Action may cause temporary disturbance from construction activities such as noise, increased human presence, increased vehicular traffic, and equipment use resulting in temporary, localized, minor to moderate adverse impacts to wildlife and sensitive species habitat and populations. A wildlife biologist will conduct an inspection prior to the removal of any structure siding to avoid possible impacts to bats.

Implementation of the Selected Action will not result in impairment of wildlife resources.

Visitor Experience

The Selected Action will improve fire/life-safety systems and comprehensively make seismic and structural stability improvements to the Gallery buildings. The result will be long-term beneficial impacts on visitor safety.

The Selected Action will also have long-term beneficial impacts on the visitor experience. The rehabilitation of the Gallery and darkroom will improve visitor accessibility. The rustic feeling of the Gallery's historic features and fabric will be retained through the rehabilitation; this attention to the structure's character will ultimately enhance the visitor's experience.

Implementation of the Selected Action will not result in impairment of the visitor experience.

Park Operations

The Selected Action includes improvements to fire/life-safety systems that will result in long-term beneficial impacts on visitor safety. During the rehabilitation construction, the Ansel Adams Gallery will be relocated to another small facility for continued operation. Comprehensive accessibility improvements will provide improved access for visitors and staff. The installation of insulation, weatherization of existing doors and windows, and upgrades to utility systems will result in a notable decrease in energy consumption and make use of the buildings more comfortable for visitors and staff. Rehabilitation of historic features and fabric along with implementation of comprehensive improvements to site drainage will also provide beneficial impacts through decreased maintenance and repair costs.

Therefore, implementation of the Selected Action will not result in impairment of park operations.

SUMMARY

Based on the analysis provided in the *Ansel Adams Gallery Complex Rehabilitation Environmental Assessment*, adverse effects and environmental impacts anticipated as a result of implementing the selected action would not be of a magnitude that would 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 NPS concludes that implementation of the Selected Action would not constitute impairment of park values and resources and would not violate the National Park Service Organic Act of 1916.

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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 in 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.



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