



Letter of Compliance Completion

To: Josh Keyes; Project Manager, Yosemite National Park

From: Cicely Muldoon; Acting Superintendent, Yosemite National Park

Subject: NEPA and NHPA Clearance 2020-009: Merced River Plan Implementation: Yosemite Lodge Highland Court Parking Lot and Roadway Paving (YH 2019) (PEPC: 89721)

The Superintendent and park interdisciplinary team have reviewed the proposed project and completed an impact analysis and documentation, and have determined the following:

- There will not be any effect on threatened, endangered, or rare species and/or their critical habitat.
- There will be no adverse effect to historic properties.
- There will not be serious or long-term undesirable environmental or visual effects.

The subject proposed project, therefore, is now cleared for all NEPA and NHPA compliance requirements as presented above. Project plans and specifications are approved and construction and/or project implementation can commence.

Required Mitigations - For the proposed project actions to be within compliance requirements during construction and/or project implementation, the following mitigations must be adhered to:

- Personnel will obey all park speed limits. On-site speed limits will be limited to 25 miles per hour. Staff will drive slowly on warm, wet nights to avoid impacts to listed frogs. Construction staff will check beneath all heavy-equipment mats at the beginning of each day before equipment drives over them to ensure that California red-legged frogs (CRLF) are not hiding beneath them. Back-fill open trenches or pits at the end of each work day. Install wildlife escape ramps in trenches and pits until filled. During construction activities, personnel shall maintain vigilance for CRLF caught in excavations. If CRLF are found, personnel/ the contractor will call a qualified NPS biologist to capture and relocate CRLF to the immediate vicinity surrounding the project area.
- Avoid digging within driplines of any bigleaf maple or dogwood tree, and trees larger than 12 inches in diameter-at-breast height. If this can't be avoided, dig by hand within the dripline to retain roots 2 inches in diameter and larger. Roots less than 2 inches diameter should be given a clean straight cut with a saw. Consult with the botanist if digging in the vicinity of black oak trees. If any bedding or backfill material is proposed for import, sources must be approved in advance by park botanist. Protect trees and vegetation that might be retained within an island of the future parking lot.
- Although there is no surface evidence of archeological resources, clearance to proceed is recommended with the condition that if concealed archeological resources are encountered during project activities, all necessary steps will be taken to protect them and the Park Cultural Resources Manager will be notified immediately.
- Carefully supervise construction operations near trees to prevent damage. Protect tree roots that underlie pavement as much as possible during demolition and repaving.
- All construction equipment that will leave paved or dirt roads shall be pressure-washed prior to entering the park and shall be clean of any soil, plant matter, or other materials. NPS natural resource specialists or

the project manager shall inspect the vehicles prior to entry into the park. Call or email Garrett Dickman to arrange equipment inspection.

There are no NHPA Recommendations for Conditions or Stipulations identified.

Acting

Superintendent:

The signed original of this document is on file at the
Environmental Planning and Compliance Office in Yosemite National Park.

Date:

5/28/2020

Cicely Muldoon

A PDF text file of the project's approved environmental compliance package containing the letter of compliance completion, categorical exclusion form, environmental screening form, and any other associated environmental clearance forms, as applicable (e.g., Wilderness Minimum Requirement Analysis, Wild and Scenic River Section 7 Analysis). The signed originals of the package are on file in the Environmental Planning and Compliance Office at Yosemite National Park.



Categorical Exclusion Documentation Form (CE Form)

Project: 2020-009 Merced River Plan Implementation: Yosemite Lodge Highland Court Parking Lot and Roadway Paving (YH 2019)

PEPC Project Number: 89721

Description of Action (Project Description):

JUSTIFICATION: The parking lot and roadway are in poor condition. Employee trailers had been in place in this parking lot since 1998 and their removal in 2019 has revealed significant potholes and pavement issues.

SCOPE: Yosemite Hospitality would like to make repairs throughout for the following: 1. Parking Lot : Pour a 2" asphalt overlay and re-stripe. 2. Roadway: Pour a 2" asphalt overlay. 3. Install a ring of code-compliant curbing at the dripline of the existing oak tree. 4. Existing curbing would be retained.

Impacts During Construction: The work will be completed in sections during regular business hours 9am-5pm in such a way that will minimize negative impacts on guest service. West portion of roadway and Highland Court Parking Lot at the Lodge will be temporarily affected. Work will be done in sections to mitigate excessive interruptions. The parking lot and roadway will be closed in sections.

Staging: Temporary fencing will be placed around area of work during the time of restoration. Depending on the area to be worked on, materials will be stored in the following locations: near Yosemite Valley Lodge maintenance shop, Food and Beverage back dock, behind the pool, or behind the 4100 buildings. One staging area will be used at a time.

Waste: Temporary asphalt waste may occur in areas that are too deteriorated to patch and need full replacement. The waste will be recycled outside of the park at the contractor's preferred recycling center.

Mitigation(s):

- Personnel will obey all park speed limits. On-site speed limits will be limited to 25 miles per hour. Staff will drive slowly on warm, wet nights to avoid impacts to listed frogs. Construction staff will check beneath all heavy-equipment mats at the beginning of each day before equipment drives over them to ensure that California red-legged frogs (CRLF) are not hiding beneath them. During construction activities, personnel shall maintain vigilance for CRLF caught in excavations. If CRLF are found, personnel/ the contractor will call a qualified NPS biologist to capture and relocate CRLF to the immediate vicinity surrounding the project area.
- Avoid digging within driplines of any bigleaf maple or dogwood tree, and trees larger than 12 inches in diameter-at-breast height. If this can't be avoided, dig by hand within the dripline to retain roots 2 inches in diameter and larger. Roots less than 2 inches diameter should be given a clean straight cut with a saw. Consult with the botanist if digging in the vicinity of black oak trees. If any bedding or backfill material is proposed for import, sources must be approved in advance by park botanist. Protect trees and vegetation that might be retained within an island of the future parking lot.
- Although there is no surface evidence of archeological resources, clearance to proceed is recommended with the condition that if concealed archeological resources are encountered during project activities, all necessary steps will be taken to protect them and the Park Cultural Resources Manager will be notified immediately.
- Carefully supervise construction operations near trees to prevent damage. Protect tree roots that underlie pavement as much as possible during demolition and repaving.

- All construction equipment that will leave paved or dirt roads shall be pressure-washed prior to entering the park and shall be clean of any soil, plant matter, or other materials. NPS natural resource specialists or the project manager shall inspect the vehicles prior to entry into the park. Call or email Garrett Dickman to arrange equipment inspection.

CE Citation: C.9 Repair, resurfacing, striping, installation of traffic control devices, repair/replacement of guardrails, etc., on existing roads.

Decision: I find that the action fits within the categorical exclusion above. Therefore, I am categorically excluding the described project from further NEPA analysis. No extraordinary circumstances apply.

Acting Superintendent:

The signed original of this document is on file at the Environmental Planning and Compliance Office in Yosemite National Park.

Date: 5/28/2020

Cicely Muldoon



ENVIRONMENTAL SCREENING FORM (ESF)

Updated Sept 2015 per NPS NEPA Handbook

A. PROJECT INFORMATION

Project Title: 2020-009 - Merced River Plan Implementation: Yosemite Lodge Highland Court Parking Lot and Roadway Paving (YH 2019)

PEPC Project Number: 89721

Project Type: Repair/Rehabilitation (REHAB)

Project Leader: Josh Keyes; Project Manager, Yosemite National Park

B. PROJECT DESCRIPTION

See Categorical Exclusion form.

C. RESOURCE IMPACTS TO CONSIDER:

Resource	Potential for Impact	Potential Issues & Impacts
Air Air Quality	None	
Biological Nonnative or Exotic Species <i>Invasive Species</i>	Potential	Issue: All construction equipment that will leave paved or dirt roads shall be pressure-washed prior to entering the park and shall be clean of any soil, plant matter, or other materials. NPS natural resource specialists or the project manager shall inspect the vehicles prior to entry into the park. Call or email Garrett Dickman to arrange equipment inspection.
Biological Species of Special Concern or Their Habitat <i>California Red Legged Frogs</i>	Potential	Issue: Personnel will obey all park speed limits. On-site speed limits will be limited to 25 miles per hour. Staff will drive slowly on warm, wet nights to avoid impacts to listed frogs. Construction staff will check beneath all heavy-equipment mats at the beginning of each day before equipment drives over them to ensure that California red-legged frogs (CRLF) are not hiding beneath them. During construction activities, personnel shall maintain vigilance for CRLF caught in excavations. If CRLF are found, personnel/ the contractor will call a qualified NPS biologist to capture and relocate CRLF to the immediate vicinity surrounding the project area.
Biological Vegetation <i>Oak Tree</i>	Potential	Issue: The large oak tree in the parking area will be protected by constructing a curb at the drip line of the tree. This protects roots as well as the permeable surface at the base of the tree.

Resource	Potential for Impact	Potential Issues & Impacts
Biological Wildlife and/or Wildlife Habitat including terrestrial and aquatic species	None	
Cultural Archeological Resources	Potential	Issue: Although there is no surface evidence of archeological resources, clearance to proceed is recommended with the condition that if concealed archeological resources are encountered during project activities, all necessary steps will be taken to protect them and the Park Cultural Resources Manager will be notified immediately.
Cultural Cultural Landscapes <i>Yosemite Lodge Historic District</i>	Potential	Issue: The introduction of new curbing within a historic district has the potential to affect the historic circulation patterns as well as the historic design of the roadways. The circulation patterns will not be affected by the installation of new curbing. Impact: No adverse effect - see assessment of effect form.
Cultural Ethnographic Resources <i>Oak Tree</i>	Potential	Issue: Black oak trees are important to the park's traditionally associated American Indian tribes and groups. The park aims to protect black oak trees. No comments have been received from the tribes.
Cultural Museum Collections	None	
Cultural Prehistoric/historic structures	None	
Geological Geologic Features	None	
Geological Geologic Processes	None	
Lightscapes Lightscapes	None	
Other Human Health and Safety <i>Accessible Parking Spaces</i>	Potential	Issue: Four percent of 92 parking spaces must be made accessible which also means that they have access to accessible pathways to the facility. At least 4 of the parking spaces will be accessible to meet this requirement and will be located elsewhere in the property where it is more appropriate for accessible parking.
Other Operational <i>Delivery Truck</i>	Potential	Issue: The striping and circulation within the Highland Court parking area has the potential to impact the access of delivery trucks through this area.

Resource	Potential for Impact	Potential Issues & Impacts
<i>Access to Loading Dock</i>		Impact: Striping will be designed to maximize parking spaces while minimizing impacts to delivery trucks that must use this area to access the loading dock.
Other Other <i>Paving Limits, Drainage, and Transitions to Existing Surfacing</i>	Potential	Issue: The design drawings were updated to specifically identify the paving limits and the transitions to existing surfacing. The plan is to grind out in front of the trench drains so that the final grade will be flush with the existing drains.
Socioeconomic Land Use	None	
Socioeconomic Minority and low-income populations, size, migration patterns, etc.	None	
Socioeconomic Socioeconomic	None	
Soundscapes Soundscapes <i>Heavy Machinery</i>	Potential	Issue: The use of heavy machinery in Yosemite Valley has the potential to impact natural soundscapes. Construction for this project will be limited to working hours outside of bird nesting season to minimize soundscape impacts to wildlife and visitors.
Viewsheds Viewsheds	None	
Visitor Use and Experience Recreation Resources	None	
Visitor Use and Experience Visitor Use and Experience <i>Visitor and Employee Parking</i>	Potential	Issue: Visitor and employee parking is in very high demand in Yosemite Valley. The purpose of this action as part of the Merced River Plan was to eliminate temporary employee housing and take advantage of the opportunity to reestablish visitor and employee parking in this area.
Water Floodplains	None	
Water Marine or	None	

Resource	Potential for Impact	Potential Issues & Impacts
Estuarine Resources		
Water Water Quality or Quantity	None	
Water Wetlands	None	
Water Wild and Scenic River	None	
Wilderness Wilderness	None	



ASSESSMENT OF ACTIONS HAVING AN EFFECT ON HISTORIC PROPERTIES

A. DESCRIPTION OF UNDERTAKING

1. **Park:** Yosemite National Park

2. **Project Description:**

Project Name: 2020-009: Merced River Plan Implementation: Yosemite Lodge Highland Court Parking Lot and Roadway Paving (YH 2019)

Prepared by: Ninette Daniele **Date Prepared:** 08/15/2019 **Telephone:**

PEPC Project Number: 89721

Describe project:

See Categorical Exclusion form.

Area of potential effects (as defined in 36 CFR 800.16[d])

The APE is the Yosemite Valley Lodge general vicinity of the parking area and road. The area is forested; visual effects are minimal. The vertical APE would be limited to asphalt replacement (approximately 5 inches).

3. **Has the area of potential effects been surveyed to identify historic properties?**

No

☒ **Yes**

4. **Potentially Affected Resource(s):**

Archeological Resources Present: Yes

Property Name: Yosemite Valley Archeological District **LCS:**

Archeological Resources Notes: No sites present in the work area.

Historical Structures/Resources Present: Yes

Property Name: Yosemite Valley Historic District **LCS:**

Property Name: Yosemite Lodge Historic District 2014 **LCS:**

Location: Yosemite Valley

Cultural Landscapes Present: Yes

Property Name: Yosemite Valley Historic District **LCS:**

Ethnographic Resources Present: No

5. **The proposed action will: (check as many as apply)**

No	Destroy, remove, or alter features/elements from a historic structure
Yes	Replace historic features/elements in kind
No	Add non-historic features/elements to a historic structure
No	Alter or remove features/elements of a historic setting or environment (inc. terrain)
No	Add non-historic features/elements (inc. visual, audible, or atmospheric) to a historic setting or cultural landscape
No	Disturb, destroy, or make archeological resources inaccessible
No	Disturb, destroy, or make ethnographic resources inaccessible
No	Potentially affect presently unidentified cultural resources
No	Begin or contribute to deterioration of historic features, terrain, setting, landscape elements, or archeological or ethnographic resources
No	Involve a real property transaction (exchange, sale, or lease of land or structures)
	Other (please specify):

6. Supporting Study Data:

(Attach if feasible; if action is in a plan, EA or EIS, give name and project or page number.)

B. REVIEWS BY CULTURAL RESOURCE SPECIALISTS

The park 106 coordinator requested review by the park's cultural resource specialist/advisors as indicated by check-off boxes or as follows:

[X] 106 Advisor

Name: Kimball Koch

Date: 08/15/2019

Comments: Per Cultural Resources Program Manager, no historical architect review required.

Check if project does not involve ground disturbance []

Assessment of Effect: ___No Potential to Cause Effect ___No Historic Properties Affected X No

Adverse Effect ___Adverse Effect X Streamlined Review

Recommendations for conditions or stipulations:

Doc Method: Streamlined Review (PA)

Streamlined Activity:

3. Repair/Resurfacing/Removal of Existing, Roads, Trails and Parking Areas

[X] Anthropologist

Name: Scott Carpenter

Date: 12/02/2019

Check if project does not involve ground disturbance []

Assessment of Effect: ___No Potential to Cause Effect ___No Historic Properties Affected X No

Adverse Effect ___Adverse Effect X Streamlined Review

Recommendations for conditions or stipulations:

Doc Method: Streamlined Review (PA)

Streamlined Activity:

3. Repair/Resurfacing/Removal of Existing, Roads, Trails and Parking Areas

[X] Archeologist
Name: Wesley Wills
Date: 08/15/2019

Check if project does not involve ground disturbance []
Assessment of Effect: ___No Potential to Cause Effect ___No Historic Properties Affected X No
Adverse Effect ___Adverse Effect X Streamlined Review
Recommendations for conditions or stipulations:
Doc Method: Streamlined Review (PA)
Streamlined Activity:
3. Repair/Resurfacing/Removal of Existing, Roads, Trails and Parking Areas

[X] Historian
Name: Scott Carpenter
Date: 08/15/2019
Comments: No historical architect review required.

Check if project does not involve ground disturbance []
Assessment of Effect: ___No Potential to Cause Effect ___No Historic Properties Affected X No
Adverse Effect ___Adverse Effect X Streamlined Review
Recommendations for conditions or stipulations:
Doc Method: Streamlined Review (PA)
Streamlined Activity:
3. Repair/Resurfacing/Removal of Existing, Roads, Trails and Parking Areas

[X] Historical Landscape Architect
Name: Kimball Koch
Date: 08/15/2019

Check if project does not involve ground disturbance []
Assessment of Effect: ___No Potential to Cause Effect ___No Historic Properties Affected X No
Adverse Effect ___Adverse Effect X Streamlined Review
Recommendations for conditions or stipulations:
Doc Method: Streamlined Review (PA)
Streamlined Activity:
3. Repair/Resurfacing/Removal of Existing, Roads, Trails and Parking Areas

No Reviews From: Curator, Historical Architect, Other Advisor

C. PARK SECTION 106 COORDINATOR'S REVIEW AND RECOMMENDATIONS

1. Assessment of Effect:
No Potential to Cause Effects

☒ No Historic Properties Affected
☒ No Adverse Effect
☐ Adverse Effect

2. Documentation Method:

☐ **A. Standard 36 CFR Part 800 Consultation**

Further consultation under 36 CFR Part 800 is needed.

☒ **B. Streamlined Review Under the 2008 Servicewide Programmatic Agreement (PA)**

The above action meets all conditions for a streamlined review under section III of the 2008 Servicewide PA for Section 106 compliance.

Applicable Streamlined Review Criteria

(Specify 1-16 of the list of streamlined review criteria.)

3. Repair/Resurfacing/Removal of Existing, Roads, Trails and Parking Areas.

☐ **C. Undertaking Related to Park Specific or Another Agreement**

The proposed undertaking is covered for Section 106 purposes under another document such as a park, region or statewide agreement established in accord with 36 CFR 800.7 or 36 CFR 800.14.

☐ **D. Combined NEPA/NHPA Process**

Process and documentation required for the preparation of an EA/FONSI or an EIS/ROD to comply with Section 106 is in accord with 36 CFR 800.8.c.

☐ **E. Memo to Project File**

3. Consultation Information

SHPO Required: No

SHPO Sent:

SHPO Received:

THPO Required: No

THPO Sent:

THPO Received:

SHPO/THPO Notes:

Advisory Council Participating: No

Advisory Council Notes:

Additional Consulting Parties: No

4. Stipulations and Conditions: Following are listed any stipulations or conditions necessary to ensure that the assessment of effect above is consistent with 36 CFR Part 800 criteria of effect or to avoid or reduce potential adverse effects.

5. Mitigations/Treatment Measures: Measures to prevent or minimize loss or impairment of historic/prehistoric properties: (Remember that setting, location, and use may be relevant.)

No Assessment of Effect mitigations identified.

6. Assessment of Effect Notes:

Designs were reviewed by CRM.

D. RECOMMENDED BY PARK SECTION 106 COORDINATOR:

NHPA Specialist

The signed original of this document is on file at the Environmental Planning and Compliance Office in Yosemite National Park.

Madelyn Ruffner

Date: 5/28/2020

E. SUPERINTENDENT'S APPROVAL

The proposed work conforms to the NPS *Management Policies* and *Cultural Resource Management Guideline*, and I have reviewed and approve the recommendations, stipulations, or conditions noted in Section C of this form.

Acting

The signed original of this document is on file at the Environmental Planning and Compliance Office in Yosemite National Park.

Superintendent:

Date: 5/28/2020

Cicely Muldoon