



National Park Service  
U.S. Department of the Interior

Yosemite National Park  
Date: 07/22/2020

## Letter of Compliance Completion

**To:** Anthony Hylko, Brian Fulce

**From:** Cicely Muldoon

**Subject:** NEPA and NHPA Clearance: 2020-121 Ahwahnee Grease Interceptor Improvement (CFF 2020) (PEPC: 88808)(PMIS: 295653)

For complete compliance information see PEPC Project 88808.

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

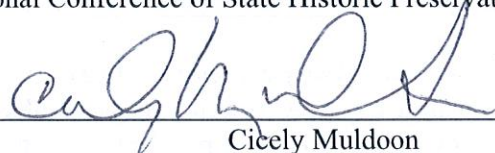
- There will not be any effect on threatened, endangered, or rare species and/or their critical habitat.
- There will be no adverse effect to historic properties.
- There will not be serious or long-term undesirable environmental or visual effects.

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:

- Notify vegetation staff before start of work to consult on black oak protection. Do not disturb soil or roots or stage any materials within the dripline of black oak trees during construction. To prevent invasive plant introductions, equipment must be inspected for cleanliness before entry into the park. Call park botanist at least 1 week in advance to arrange inspection. If backfill is needed, fill sources must be approved by park botanist before use.
- Archeological and tribal monitoring is required. Call Cultural Resources Program Manager at least 2 months in advance to arrange monitoring staffing.
- If previously unknown archeological resources are discovered during construction, all work in the immediate vicinity (600 feet) of the discovery shall be halted until the resources are identified and documented and an appropriate mitigation strategy developed, if necessary, in accordance with pertinent laws and regulations, including the stipulations of the 2008 Programmatic Agreement Among the National Park Service (U.S. Department of the Interior), the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers.

Superintendent: \_\_\_\_\_

  
Cicely Muldoon

Date: \_\_\_\_\_

JUL 29 2020





## Categorical Exclusion Documentation Form (CE Form)

**Project:** 2020-121 Ahwahnee Grease Interceptor Improvement (CFF 2020)

**PEPC Project Number:** 88808

**Description of Action (Project Description):**

This project proposes to add a grease interceptor to the existing grease management system at The Ahwahnee. A 1,500 gallon grease interceptor was originally constructed in 1984 and was replaced with a 6,000 gallon interceptor in 2014. These are both approximately 50 feet west of the northwest portion of the hotel (enclosure 1: Project Location Map/Area of Potential Effects). The current interceptor is not functioning adequately, such that substantial amounts of grease are getting through the grease interceptor and into the downstream sewer system and ultimately into the lift station. Investigation has shown that the interceptor outlet temperature is above 100 degrees, which does not allow the grease to coagulate and settle into the interceptor. By adding another grease interceptor (4,000 gallons) to the existing interceptor, the retention time of the system will increase allowing the grease wastewater to cool and coagulate properly.

The proposed grease interceptor will be positioned south of the existing interceptor and will include trenching to connect associated piping to the existing sewer line approximately 15 feet to the west. This will include construction of two new manholes. This new grease interceptor will bypass a section of the existing piping between the existing interceptor and the lift station, which is located approximately 130 feet to the northwest. The undertaking will require ground disturbance of approximately 15 feet wide x 40 feet long x 8 feet deep to install the equipment, and a maximum disturbance for trenching of 100 feet long x 24 inches x 60 inches deep for the associated piping and two manholes. The existing piping will be left in place. Fill will be replaced on top of the equipment and the area will be rehabilitated.

The tasks for this effort include the following:

1. Excavate and install new interceptor
2. Connect new interceptor to existing lines and/or tie into existing lines
3. Test and backfill
4. Re-grade and re-pave where disturbed in excavation

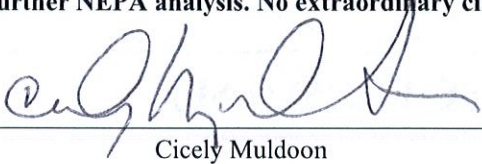
**Mitigation(s):**

- Notify vegetation staff before start of work to consult on black oak protection. Do not disturb soil or roots or stage any materials within the dripline of black oak trees during construction. To prevent invasive plant introductions, equipment must be inspected for cleanliness before entry into the park. Call park botanist at least 1 week in advance to arrange inspection. If backfill is needed, fill sources must be approved by park botanist before use.
- Archeological and tribal monitoring is required. Call Cultural Resources Program Manager at least 2 months in advance to arrange monitoring staffing.
- If previously unknown archeological resources are discovered during construction, all work in the immediate vicinity (600 feet) of the discovery shall be halted until the resources are identified and documented and an appropriate mitigation strategy developed, if necessary, in accordance with pertinent laws and regulations, including the stipulations of the 2008 Programmatic Agreement Among the National Park Service (U.S. Department of the Interior), the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers.

**CE Citation:** C.15 Installation of underground utilities in previously disturbed areas having stable soils, or in an existing utility right-of-way.

**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.

**Superintendent:**

  
Cicely Muldoon

**Date:**

JUL 29 2020





## ENVIRONMENTAL SCREENING FORM (ESF)

Updated Sept 2015 per NPS NEPA Handbook

### A. PROJECT INFORMATION

**Project Title:** 2020-121 Ahwahnee Grease Interceptor Improvement (CFF 2020)  
**PEPC Project Number:** 88808  
**PMIS Number:** 295653  
**Project Type:** Other Maintenance Activities (MNT)  
**Project Leader:** Anthony Hylko

### B. PROJECT DESCRIPTION

See Categorical Exclusion form.

### C. RESOURCE IMPACTS TO CONSIDER:

Resource	Potential for Impact	Potential Issues & Impacts
<b>Air</b> Air Quality	None	
<b>Biological</b> Nonnative or Exotic Species	Potential	All heavy equipment arriving from outside the park will undergo inspection for presence of invasive species.
<b>Biological</b> Species of Special Concern or Their Habitat	Potential	No effect to California Red Legged Frogs. We do not anticipate any frogs in the project area based on the size of the project area, location and lack of water, duration, and minimal amount of ground disturbance occurring.
<b>Biological</b> Vegetation	None	
<b>Biological</b> Wildlife and/or Wildlife Habitat including terrestrial and aquatic species	Potential	Issue: Man hole covers must be heavy enough to not allow bears or other wildlife to remove them.
<b>Cultural</b> Archeological Resources	Potential	<p>Issue: The depth of the grease interceptor was reduced from previous proposals to ensure that the required ground disturbance was minimized and did not exceed previous ground disturbance in the area.</p> <p>Impact: This excavation will occur within the boundaries of archeological site CA-MRP-0292/293/H, which is individually eligible for listing in the National Register and is a contributing element of the Yosemite Valley Archeological District. The</p>

		<p>site includes multiple bedrock milling stations, a widespread light to moderate deposit of surface and subsurface flaked-stone tool and debitage, ground stone, historical refuse, subsurface historical features associated with the historical use of the area as the Kenneyville stables and associated buildings, and pictographs. This portion of the site has been previously disturbed by construction of the hotel and associated utility lines. Controlled archeological subsurface survey, test excavations, and construction monitoring have previously occurred in this location, including in 2014 for installation of the existing grease interceptor that is next to the proposed one. These investigation revealed a buried light to moderate deposit of flaked-stone tools and debitage, with a few pieces of ground stone and historical refuse as well. Given the previously disturbed nature of the deposit and the extensive previous archeological subsurface investigations in this location, but the high likelihood of encountering archeological materials during ground-disturbing activities, archeological monitoring is recommended for all excavation during the project. Recommendations: The project must include archeological monitoring during ground-disturbing activities with an associated monitoring plan that will focus on retaining any significant archeological materials for future study of the site.</p>
<b>Cultural</b> Cultural Landscapes	Potential	Issue: The cultural landscape would not be affected. The introduced man hole covers are out of the primary area of significance for the hotel landscaping and Ahwahnee meadow.
<b>Cultural</b> Ethnographic Resources	Potential	Issue: Project was included on the March 2019 and February 2020 consultation spreadsheets. Ground disturbance has been reduced since then. No comments were received. The project will include tribal monitoring.
<b>Cultural</b> Museum Collections	None	
<b>Cultural</b> Prehistoric/historic structures	None	
<b>Geological</b> Geologic Features	None	
<b>Geological</b> Geologic Processes	None	
<b>Lightsapes</b> Lightsapes	None	
<b>Other</b> Human Health and Safety	None	
<b>Other</b> Operational	Potential	Issue: This project will reduce the potential for operational impacts to the lift station and other waste water treatment infrastructure from the current inadequate system.
<b>Other</b> Other <i>Heat Coils in Boiler Room</i>	Potential	Issue: Heat transfer coils in the boiler room but dismissed. The additional grease interceptor will be installed first and monitored for efficiency. If there is an additional need for the heat coils, the park may consider this as a future project. This decision was made to streamline the project scope and its review.
<b>Socioeconomic</b> Land Use	None	

<b>Socioeconomic</b> Minority and low-income populations, size, migration patterns, etc.	None	
<b>Socioeconomic</b> Socioeconomic	None	
<b>Soundscapes</b> Soundscapes	None	
<b>Viewsheds</b> Viewsheds	None	
<b>Visitor Use and Experience</b> Recreation Resources	None	
<b>Visitor Use and Experience</b> Visitor Use and Experience	None	
<b>Water</b> Floodplains	None	
<b>Water</b> Marine or Estuarine Resources	None	
<b>Water</b> Water Quality or Quantity	None	
<b>Water</b> Wetlands	None	
<b>Water</b> Wild and Scenic River	None	
<b>Wilderness</b> 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:** Ahwahnee Grease Interceptor Improvement (CFF 2020)

**Prepared by:** Erin Davenport **Date Prepared:** 01/07/2020 **Telephone:** (209) 379-1067

**PEPC Project Number:** 88808

**Describe project:**

See Categorical Exclusion form.

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

The Area of Potential Effects (APE) is bounded to the north by the Ahwahnee parking lot, to the east and south by The Ahwahnee, and to the west by the edge of the forested area. The vertical APE extends to 4 meters below grade, there is not above-ground APE.

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

No

☒ Yes

**Source or reference:**

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

**Archeological Resources Present:** Yes

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

**Archeological Resources Notes:** This excavation will occur within the boundaries of archeological site CA-MRP-0292/293/H, which is individually eligible for listing in the National Register and comprise contributing elements of the Yosemite Valley Archeological District as well as an ORV of the Merced Wild and Scenic River. The site includes multiple bedrock milling stations, a widespread light to moderate deposit of surface and subsurface flaked-stone tool and debitage, ground stone, historical refuse, subsurface historical features associated with the historical use of the area as the Kenneyville stables and associated buildings, and pictographs. This portion of the site has been previously disturbed by construction of the hotel and associated utility lines. Controlled archeological subsurface survey, test excavations, and construction monitoring have previously occurred in this vicinity, revealing a light to moderate deposit of flaked-stone tools and debitage, with minimal ground stone and historical refuse as well.

Given the extensive existing archeological data about the deposits in the project's vicinity, and the fact that previous disturbance has occurred, archeological data recovery excavations are not recommended. However, both archeological and

tribal monitoring will be required during construction to address any discovery of buried archeological features, and recover diagnostic artifacts to add information to the information available for site interpretation.

**Historical Structures/Resources Present: Yes**

**Property Name:** The Ahwahnee Hotel (1977 NR) **LCS:**

**Property Name:** The Ahwahnee Hotel (NHL) **LCS:**

**Property Name:** The Ahwahnee Hotel **LCS:**

**Historical Structures/Resources Notes:** The proposed project would be located on the western edge of the Ahwahnee developed area of the Yosemite Valley Historic District. However, it would be located within Ahwahnee Meadow which is a contributing natural feature of the historic district as well as an outstandingly remarkable value (ORV) of the Merced Wild and Scenic River. The Ahwahnee Hotel was listed on the National Register of Historic Places in 1977. The building was subsequently designated a National Historic Landmark in 1987. The Ahwahnee Hotel and grounds were identified as a contributing developed area within the Yosemite Valley historic district in 2006.

**Cultural Landscapes Present: Yes**

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

**Cultural Landscapes Notes:** The project is not likely to have impacts on the scenic, historic, or ecological functions of the meadow.

**Ethnographic Resources Present: Yes**

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

**Ethnographic Resources Notes:** The park initiated consultation with Yosemite's traditionally associated American Indian tribes and groups on the monthly consultation spreadsheet sent on February 4, 2020. To date, no comments have been received regarding identification or effects to historic properties with religious and cultural significance.

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

No	Destroy, remove, or alter features/elements from a historic structure
No	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)
Yes	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
Yes	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:

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### [ X ] 106 Advisor

**Name:** Madelyn Ruffner

**Date:** 07/22/2020

**Comments:** No historical architect review necessary per 4/14/20 and 6/26/2020 CRM team discussions.

*Check if project does not involve ground disturbance [ ]*

**Assessment of Effect:** ☐ No Potential to Cause Effect ☐ No Historic Properties Affected ☒ No Adverse Effect ☐ Adverse Effect ☐ Streamlined Review

**Recommendations for conditions or stipulations:**

**Doc Method:** Standard 4-Step Process

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### [ X ] Anthropologist

**Name:** Scott Carpenter

**Date:** 05/26/2020

**Comments:** Project was included on the March 2019 and February 2020 consultation spreadsheets. Ground disturbance has been reduced since then. No comments were received.

*Check if project does not involve ground disturbance [ ]*

**Assessment of Effect:** ☐ No Potential to Cause Effect ☐ No Historic Properties Affected ☒ No Adverse Effect ☐ Adverse Effect ☐ Streamlined Review

**Recommendations for conditions or stipulations:** Construction contract to include tribal monitoring.

**Doc Method:** Standard 4-Step Process

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### [ X ] Archeologist

**Name:** Wesley Wills

**Date:** 04/28/2020

**Comments:** This excavation will occur within the boundaries of archeological site CA-MRP-0292/293/H, which is individually eligible for listing in the National Register and is a contributing element of the Yosemite Valley Archeological District. The site includes multiple bedrock milling stations, a widespread light to moderate deposit of surface and subsurface flaked-stone tool and debitage, ground stone, historical refuse, subsurface historical features associated with the historical use of the area as the Kenneyville stables and associated buildings, and pictographs. This portion of the site has been previously disturbed by construction of the hotel and associated utility lines. Controlled archeological subsurface survey, test excavations, and construction monitoring have previously occurred in this location, including in 2014 for installation of the existing grease interceptor that is next to the proposed one. These investigation revealed a buried light to moderate deposit of flaked-stone tools and debitage, with a few pieces of ground stone and historical refuse as well. Given the previously disturbed nature of the deposit and the extensive previous archeological subsurface investigations in this location, but the high likelihood of encountering archeological materials during ground-disturbing activities, archeological monitoring is recommended for all excavation during the project.

*Check if project does not involve ground disturbance [ ]*

**Assessment of Effect:** ☐ No Potential to Cause Effect ☐ No Historic Properties Affected ☒ No Adverse

Effect ☐ Adverse Effect ☐ Streamlined Review

**Recommendations for conditions or stipulations:** The project must include archeological monitoring during ground-disturbing activities with an associated monitoring plan that will focus on retaining any significant archeological materials for future study of the site.

**Doc Method:** Standard 4-Step Process

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**[ X ] Historian**

**Name:** Scott Carpenter

**Date:** 05/26/2020

**Check if project does not involve ground disturbance [ ☐ ]**

**Assessment of Effect:** ☐ No Potential to Cause Effect ☐ No Historic Properties Affected ☒ No Adverse

Effect ☐ Adverse Effect ☐ Streamlined Review

**Recommendations for conditions or stipulations:**

**Doc Method:** Standard 4-Step Process

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**[ X ] Historical Landscape Architect**

**Name:** Vida Germano

**Date:** 06/01/2020

**Comments:** This project will have no adverse effect to the cultural landscape.

**Check if project does not involve ground disturbance [ ☐ ]**

**Assessment of Effect:** ☐ No Potential to Cause Effect ☐ No Historic Properties Affected ☒ No Adverse

Effect ☐ Adverse Effect ☐ Streamlined Review

**Recommendations for conditions or stipulations:**

**Doc Method:** Standard 4-Step Process

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**No Reviews From:** Curator, Historical Architect, 106 Advisor, Other Advisor

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## **C. PARK SECTION 106 COORDINATOR'S REVIEW AND RECOMMENDATIONS**

### **1. Assessment of Effect:**

	No Potential to Cause Effects
	No Historic Properties Affected
X	No Adverse Effect
	Adverse Effect

### **2. Documentation Method:**

**[ X ] 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.)

**[ ] 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:** Yes

**SHPO Sent:** 6/22/2020

**SHPO Received:** 7/17/2020

**THPO Required:** Yes

**THPO Sent:** Mar 1, 2019

**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.)

**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: (See CRM sign offs)

**D. RECOMMENDED BY PARK SECTION 106 COORDINATOR:**

**NHPA Specialist**

*Madelyn Ruffner*  
\_\_\_\_\_  
Madelyn Ruffner

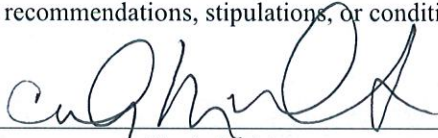
7/24/2020

**Date:**

**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.

**Superintendent:**

  
Cicely Muldoon

**Date:**

JUL 29 2020



Re: Ready for initialing: Ahwahnee grease inteceptor CE

Morse, Kathleen S <Kathleen\_Morse@nps.gov>

Mon 7/27/2020 10:45 AM

To: Ruffner, Madelyn L <Madelyn\_Ruffner@nps.gov>

Cc: Davenport, Erin S <Erin\_Davenport@nps.gov>

First sentence in CE has typo. "galloon" I don't think I corrected it, but if you do--initialed.

**Kathleen S. Morse**

**Division Chief, Strategic Planning and Project Management**

**Yosemite National Park**

**(209) 379-2003 Home Office (start talking, I'll pick up, avoiding spam!)**

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**From:** Ruffner, Madelyn L <Madelyn\_Ruffner@nps.gov>

**Sent:** Friday, July 24, 2020 2:46 PM

**To:** Morse, Kathleen S <Kathleen\_Morse@nps.gov>

**Cc:** Davenport, Erin S <Erin\_Davenport@nps.gov>

**Subject:** Ready for initialing: Ahwahnee grease inteceptor CE

Kathleen, this one's ready for your review and initialing. Please see [Teams](#).

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Madelyn Ruffner

Yosemite National Park

PO Box 700

El Portal, CA 95318

209-379-1226

madelyn\_ruffner@nps.gov

