



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.

## Letter of Compliance Completion

**To:** Howard Kaufmann, Project Manager, Yosemite National Park

**From:** Cicely Muldoon, Acting Superintendent, Yosemite National Park

**Subject:** NEPA and NHPA Clearance: 2020-134 T-Mobile Turtleback Dome Cell Site Installation (PEPC: 95081)

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 historic properties affected.
- 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:

- All construction equipment and vehicles should stay on the established access road to avoid disturbance to archeological sites. No off-road equipment use or staging is authorized.
- No off-road travel or staging is allowed on Turtleback Dome Road, and stay within all barriers to protect special-status plant species Yosemite Bitterroot (*Lewisia disepala*). Schedule an on-site meeting with Vegetation staff and construction team prior to construction to view habitat areas for avoidance and consult on selection of staging areas. Construction compliance for this site and species has been an issue in the past, with contractors moving rock barriers. Consult with Plant Ecologist Kimiora Ward at kimiora\_ward@nps.gov to schedule preconstruction site visit.
- No night work is authorized.
- Ensure that any open trenches are fitted with escape ramps to allow for any animals to get out. They should be set at the edge of the trench at approximately a 45 degree angle and be made of rough material to allow for traction.
- Compliance with food-storage and garbage disposal requirements must be achieved at all times as specified in the special use permit.
- 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.

*Comment:* Contact Garrett Dickman to schedule equipment inspection

**Acting Superintendent:** \_\_\_\_//*Sabrina Diaz (acting) for*//\_\_\_\_ **Date:** \_\_\_\_*August 20, 2020*\_\_\_\_  
Cicely Muldoon

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



## Categorical Exclusion Documentation Form (CE Form)

**Project:** T-Mobile Turtleback Dome Cell Site Installation

**PEPC Project Number:** 95081

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

On November 10, 2014, T-Mobile West LLC (Permittee) applied to the National Park Service (NPS), for a 10-year Wireless Telecommunications Facility Right-of-Way (ROW) permit to use and occupy the existing Turtleback Dome telecommunications site.

This compliance covers issuance of the ROW as well as T-Mobile's proposal to install new cell equipment at the existing Turtleback Dome telecommunications site. Work includes installing new antennas, hardware in equipment room, electrical upgrade, and a new transformer. The scope of work to be implemented as part of this ROW includes:

- Install (1) new 6201 radio rack and (1) new PBC6200 battery rack
- Install new 200A meter and electrical panel
- Install (3) new antennas on new antenna mounts from 60'-77' up on the existing lattice tower
- Install (6) new tower-mounted units at antennas on the lattice tower

Additional work to be completed which was not included in the original ROW but which will be outlined in T-Mobile's Special Use Permit (SUP) for this action includes:

- Install (8) 25/2 breakers to feed a new battery rack
- Run 120' of new above-ground 3" conduit in red-dyed concrete cap from transformer to new meter main on shelter. Existing conduit is semi-buried and will be dug out to facilitate the alignment of the new conduit.
- Install (1) new 25KVa transformer on new concrete pad on top of existing granite slab.
- Remove (1) existing transformer, concrete pad to remain for grounding of new transformer.

Additionally, the park is requesting that T-Mobile move existing transmitters currently housed in the equipment shelter to the self-supported tower as part of this action.

This project is expected to start August 2020 at the earliest. Any additional work not explicitly outlined above will need to be reviewed and approved by the park through separate compliance completed prior to implementation.

**Mitigation(s):**

- All construction equipment and vehicles should stay on the established access road to avoid disturbance to archeological sites. No off-road equipment use or staging is authorized.
- No off-road travel or staging is allowed on Turtleback Dome Road, and stay within all barriers to protect special-status plant species Yosemite Bitterroot (*Lewisia disepala*). Schedule an on-site meeting with Vegetation staff and construction team prior to construction to view habitat areas for avoidance and consult on selection of staging areas. Construction compliance for this site and species has been an issue in the past, with contractors moving rock barriers. Consult with Plant Ecologist Kimiora Ward at kimiora\_ward@nps.gov to schedule preconstruction site visit.
- No night work is authorized.

- Ensure that any open trenches are fitted with escape ramps to allow for any animals to get out. They should be set at the edge of the trench at approximately a 45 degree angle and be made of rough material to allow for traction.
- Compliance with food-storage and garbage disposal requirements must be achieved at all times as specified in the special use permit.
- 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.  
*Comment:* Contact Garrett Dickman to schedule equipment inspection

**CE Citation:** C.12 Upgrading or adding new overhead utility facilities to existing poles, or replacement poles which do not change existing pole line configurations.

**CE Justification:**

**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:** //Sabrina Diaz (acting) for// **Date:** August 20, 2020  
Cicely Muldoon

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**Extraordinary Circumstances:**

If implemented, would the proposal...	Yes/No	Notes
<b>A.</b> Have significant impacts on public health or safety?	No	
<b>B.</b> Have significant impacts on such natural resources and unique geographic characteristics as historic or cultural resources; park, recreation, or refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (Executive Order 11990); floodplains (Executive Order 11988); national monuments; migratory birds; and other ecologically significant or critical areas?	No	
<b>C.</b> Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources (NEPA section 102(2)(E))?	No	
<b>D.</b> Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks?	No	
<b>E.</b> Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects?	No	
<b>F.</b> Have a direct relationship to other actions with individually insignificant, but cumulatively significant, environmental effects?	No	
<b>G.</b> Have significant impacts on properties listed or eligible for listing on the National Register of Historic Places, as determined by either the bureau or office?	No	
<b>H.</b> Have significant impacts on species listed or proposed to be listed on the List of Endangered or Threatened Species, or have significant impacts on designated Critical Habitat for these species?	No	
<b>I.</b> Violate a federal, state, local or tribal law or requirement imposed for the protection of the environment?	No	
<b>J.</b> Have a disproportionately high and adverse effect on low income or minority populations (EO 12898)?	No	
<b>K.</b> Limit access to and ceremonial use of Indian sacred sites on federal lands by Indian religious practitioners or adversely affect the physical integrity of such sacred sites (EO 130007)?	No	
<b>L.</b> Contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of such species (Federal Noxious Weed Control Act and Executive Order 13112)?	No	



## ENVIRONMENTAL SCREENING FORM (ESF)

Updated Sept 2015 per NPS NEPA Handbook

### A. PROJECT INFORMATION

**Project Title:** T-Mobile Turtleback Dome Cell Site Installation  
**PEPC Project Number:** 95081  
**Project Type:** Special Use Permit (SUP)  
**Project Location:**  
**County, State:** Mariposa, California **District, Section:** Turtle Back Dome  
**Project Leader:** Howard Kaufmann

### B. PROJECT DESCRIPTION

See Categorical Exclusion form

### C. RESOURCE IMPACTS TO CONSIDER:

Resource	Potential for Impact	Potential Issues & Impacts
Air Air Quality	None	
<b>Biological</b> Nonnative or Exotic Species <i>Vegetation- nonnative species</i>	Potential	Issue: Non-NPS construction equipment will be entering the park, posing a risk of spreading nonnative or exotic plant species.  Impact: 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.
<b>Biological</b> Species of Special Concern or Their Habitat <i>Small animals</i>	Potential	Issue: Potential for animals to get trapped in open trenches during construction.  Impact: Ensure that any open trenches are fitted with escape ramps to allow for any animals to get out. They should be set at the edge of the trench at approximately a 45 degree angle and be made of rough material to allow for traction.
<b>Biological</b> Species of Special Concern or Their Habitat <i>Wildlife- Disturbance</i>	Potential	Issue: Temporary noise from construction activities disturbing wildlife.  Impact: No night work is authorized.

<b>Resource</b>	<b>Potential for Impact</b>	<b>Potential Issues &amp; Impacts</b>
<b>Biological</b> Species of Special Concern or Their Habitat <i>Wildlife- Litter / Trash</i>	Potential	Issue: Work crews will bring food on site and generate garbage, potentially attracting wildlife.  Impact: Compliance with food storage and garbage disposal requirements will be achieved at all times during project implementation.
<b>Biological</b> Vegetation <i>Sensitive Vegetation</i>	Potential	Issue: Populations of sensitive Yosemite Bitterroot plant are present at the project site.  Impact: Sensitive plant species will be protected during project implementation: Do not drive off of defined roadways and barrier boulders. Park Botanists will be consulted prior to work commencing.
<b>Biological</b> Wildlife and/or Wildlife Habitat including terrestrial and aquatic species	None	
<b>Cultural</b> Archeological Resources	None	See assessment of effect for details on cultural resources.
<b>Cultural</b> Cultural Landscapes	None	
<b>Cultural</b> Ethnographic Resources	None	
<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 <i>Emergency communications</i>	Potential	Issue: Project is expected to increase telecommunications coverage in certain areas of the park for use by visitors and employees.  Impact: Increased telecommunications coverage in certain backcountry areas will allow for quicker response to emergencies in those areas.

<b>Resource</b>	<b>Potential for Impact</b>	<b>Potential Issues &amp; Impacts</b>
<b>Other</b> Operational <i>Communications- Emergency Response</i>	None	See above.
<b>Other</b> Other	None	
<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	Potential	Issue: Temporary noise from construction activities.  Impact: Impacts will be temporary during construction. The site is located in a remote area with little visitor use.
<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	See Health and Safety Above.
<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>Resource</b>	<b>Potential for Impact</b>	<b>Potential Issues &amp; Impacts</b>
<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:** T-Mobile Turtleback Dome Cell Site Installation

**Prepared by:** Daniel Sharon    **Date Prepared:** 06/25/2020    **Telephone:** (209) 379-1038

**PEPC Project Number:** 95081

#### **Locations:**

**County, State:** Mariposa, CA

**District, Section:** Turtle Back Dome

#### **Describe project:**

See Categorical Exclusion form

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

The APE is limited to the existing footprint of the Turtleback Dome Telecommunications facility. Equipment will enter the site via the existing access road. The subvertical APE will be associated with limited digging around the existing electrical conduit to facilitate the construction of the concrete cap and is expected to be no more than 2' deep. Visual impacts will be limited to the immediate area surrounding the site; the site is surrounded by tall trees and steep cliffs and is not in an area of the park with high visitor use.

### 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:** No

**Historical Structures/Resources Present:** No

**Cultural Landscapes Present:** No

**Ethnographic Resources Present:** No

**Ethnographic Resources Notes:** Previous projects at this site have been presented to Tribal partners numerous times via the Tribal Spreadsheet (February 2014, June 2014, September 2016, and June 2017) and Tribal monitoring has occurred. No properties of religious or cultural significance have been identified.

**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)
- 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
- 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:

**106 Advisor**

**Name:** Madelyn Ruffner

**Date:** 07/08/2020

*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:** Park Specific or Other Programmatic Agreement (PA)

**Streamlined Activity:**

- 9. Maintenance or Replacement of Non-Historic Utility Lines, Transmission Lines, and Fences

**Anthropologist**

**Name:** Liz Williams

**Date:** 07/08/2020

**Comments:** see archeologist comments

*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:** see archeologist recommendations

**Doc Method:** Park Specific or Other Programmatic Agreement

**Streamlined Activity:**

9. Maintenance or Replacement of Non-Historic Utility Lines, Transmission Lines, and Fences

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**[ X ] Archeologist**

**Name:** Wesley Wills

**Date:** 07/08/2020

**Comments:** The project area has been archeologically surveyed in 1988 and 2018 with no archeological sites identified. No additional archeological work is recommended.

*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:** Park Specific or Other Programmatic Agreement

**Streamlined Activity:**

9. Maintenance or Replacement of Non-Historic Utility Lines, Transmission Lines, and Fences

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**[ X ] Historian**

**Name:** Scott Carpenter

**Date:** 07/08/2020

**Comments:** No historical architect or historical landscape architect review required.

*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:** Park Specific or Other Programmatic Agreement

**Streamlined Activity:**

9. Maintenance or Replacement of Non-Historic Utility Lines, Transmission Lines, and Fences

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

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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
- 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.)

9. Maintenance or Replacement of Non-Historic Utility Lines, Transmission Lines, and Fences.

**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.)

**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:

- All construction equipment and vehicles should stay on the established access road to avoid disturbance to archeological sites. No off-road equipment use or staging is authorized.

**6. Assessment of Effect Notes:**

Project is covered under the YOSE PA Category 9(a and f).





## Other Compliance/Consultations Form

**Park Name:** Yosemite National Park

**PEPC Project Number:** 95081

**Project Title:** T-Mobile Turtleback Dome Cell Site Installation

**Project Type:** Special Use Permit

**Project Location:**

**County, State:** Mariposa, CA      **District, Section:** Turtle Back Dome

**Project Leader:** Howard Kaufmann

### ESA

**Any Federal Species in the project Area?** No

**If species in area:** No Effect

**Was Biological Assessment prepared?** No

**If Biological Assessment prepared, concurred?**

**Formal Consultation required?** No

**Formal Consultation Notes:**

This project occurs within the greater footprint of fisher habitat, but due to its limited size, location on a development, and siting within a rocky area, there will be No Effect to fishers.

**Formal Consultation Concluded:**

**Any State listed Species in the Project Area?** No

**Consultation Information:**

**General Notes:** This project will be done during the day, will not require the removal of any habitat, and is not expected to disturb any denning or nesting species.

**Data Entered By:**  Rachel Mazur

**Date:**  July 14, 2020

### ESA Mitigations

*No ESA mitigations are associated with this project.*