



## Letter of Compliance Completion

**To:** Michael Pieper, Project Manager, Yosemite National Park

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

**Subject:** NEPA and NHPA Clearance: Glacier Point Road Rehabilitation (2020\_126) (PEPC: 85978)

The Superintendent and park interdisciplinary team reviewed the proposed project, completed and documented an impact analysis, and 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 proposed project is now cleared for NEPA and NHPA compliance requirements as presented above. Project plans and specifications are approved and construction and/or project implementation can commence.

**Required Mitigations** - The project manager must adhere to the following mitigations for the proposed project actions to be within compliance requirements during construction and/or project implementation:

- To protect the Sierra Nevada yellow-legged frog, replace the 36" culvert at Summit Meadow with a 60" pipe, 1/3 embedded. Conduct biological monitoring at the site during culvert removal and replacement.
- Adhere to the Conservation Measures required in the U.S. Fish and Wildlife Service July 18, 2019 Biological Opinion for Road Maintenance and Rehabilitation Projects in Yosemite (see attached)
- Continue consultation with the NPS Cultural Resources Program Manager during construction to ensure the visual and physical effects of the road widening for safety purposes do not adversely affect the character of the road corridor.
- Conduct tribal monitoring during ground disturbing activities.
- Follow instructions to avoid ground disturbance within known archeological sites. This includes restricting parking on abandoned road features including the Old Glacier Point Road alignment.
- To limit potential introduction of invasive species into Yosemite, contact the Vegetation and Ecological Restoration Branch Chief to arrange for equipment cleaning and inspection before entering park and follow invasive species protection protocol.
- To protect Waters of the U.S., apply for Clean Water Act Section 404/401 permits and adhere to requirements in the permits.

Acting  
Superintendent:

Cicely Muldoon

Date: 1/30/2020

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Cicely Muldoon



## Categorical Exclusion Documentation Form (CE Form)

**Project:** Glacier Point Road Rehabilitation

**PEPC Project Number:** 85978

### Description of Action (Project Description)

Yosemite National Park plans to repair aging and deteriorated pavement, pullouts, and parking areas along the Glacier Point Road. The scope of work includes:

- Pulverize and repave ten miles of the Glacier Point Road between Badger Pass and Glacier Point.
- Repair the hairpin curves on the steep descent to Glacier Point to ensure that large vehicles can drive safely without drifting into the opposite lane.
- Widen the pullout at the Clark Range Overlook to meet minimum safety standards by replacing the existing dry-laid sloped wall with a vertical masonry wall (using the stone from the existing wall).
- Grade and pave a 275-foot by 75-foot parking area about 350 feet west of the existing Sentinel Dome parking area to replace off-road non-sanctioned parking. Add a new vault toilet. Double the size of the vault toilet at the existing Sentinel Dome parking area and move it fifty feet to the east.
- Add curbing near Washburn Point to eliminate overflow roadside parking.
- Repair slumping portions of the road west of Summit Meadow.
- Repair existing asphalt-paved ditches and road curbs. Replace existing graded dirt ditches with asphalt paved ditches.
- Replace or upsize 23 failed drainage culverts.
- Formalize and pave selected gravel pullouts based on safety, operational, emergency, and resource needs.
- Remove non-historic pullouts with insufficient stopping sight distance and/or resource impacts.
- Install concrete braking pads at shuttle stops for major trailheads.
- Repave the Glacier Point parking area. Add two concrete staircases connecting the upper and lower parking bays. Replace damaged sidewalks and curb.
- Widen the McGurk Meadows Trailhead Parking Area to accommodate 90 degree pull-in parking and eliminate cars backing into the travel lane and to provide room for the shuttle bus.

The project team evaluated several alternatives for the construction and road closure schedule and determined that a full road closure in 2021 (leaving the area open for winter activities) and a partial closure in 2022 (30-minute delays) is the best course of action for visitor and worker safety, overall project duration, and cost reductions. If the park was to enact a partial road closure the first year instead of the preferred full closure, it would add an extra year to the project schedule. The project will not impact winter recreation at the Badger Pass Ski Area or skiing on the Glacier Point Road.

The NPS opened up the project for public comment from mid-August 2019 through September 19, 2019. The park hosted a public meeting on August 28, 2019, in Oakhurst and a webinar on September 4, 2019 to share information and gather additional public input. All public input was considered in the final decision for this project. See attached for a summary of public input.

### Mitigation(s)

- To protect the Sierra Nevada yellow-legged frog, replace the 36" culvert at Summit Meadow with a 60" pipe, 1/3 embedded. Conduct biological monitoring at the site during culvert removal and replacement.
- Adhere to the Conservation Measures required in the U.S. Fish and Wildlife Service July 18, 2019 Biological Opinion for Road Maintenance and Rehabilitation Projects in Yosemite (see attached)

- Continue consultation with the NPS Cultural Resources Program Manager during construction to ensure the visual and physical effects of the road widening for safety purposes do not adversely affect the character of the road corridor.
- Conduct tribal monitoring during ground disturbing activities.
- Follow instructions to avoid ground disturbance within known archeological sites. This includes restricting parking on abandoned road features including the Old Glacier Point Road alignment.
- To limit potential introduction of invasive species into Yosemite, contact the Vegetation and Ecological Restoration Branch Chief to arrange for equipment cleaning and inspection before entering park and follow invasive species protection protocol.
- To protect Waters of the U.S., apply for Clean Water Act Section 404/401 permits and adhere to requirements in the permits.

**CE Citation:**

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

**CE Justification:**

Per Departmental guidance, this CE applies to road maintenance, rehabilitation, repaving, and reconstruction on existing roads within the existing road prism. Actions may also include repair or replacement of culverts, signs, surfacing of right-turn lanes at intersections in previously disturbed areas, seal coating a parking lot, routine roadside brushing, grading, and other modifications.

**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**

Cicely Muldoon

**Date:** 1/30/2020

**Superintendent:**

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\_\_\_\_\_

Cicely Muldoon

**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 13007)?	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

<b>Project Title:</b>	Glacier Point Road Rehabilitation
<b>PEPC Project Number:</b>	85978
<b>Project Type:</b>	Repair/Rehabilitation (REHAB)
<b>Project Location:</b>	Mariposa, California
<b>Project Leader:</b>	Michael Pieper

### B. PROJECT DESCRIPTION

See Categorical Exclusion Form

### C. RESOURCE IMPACTS TO CONSIDER:

Resource	Potential for Impact	Potential Issues & Impacts
<b>Air</b> Air Quality	Potential	Impact: Short-term construction related effects.
<b>Biological</b> Nonnative or Exotic Species	Potential	<p>Issue: Potential introduction of non-native species.</p> <p>Impact: To mitigate potential impacts, contact the Vegetation and Ecological Restoration Branch Chief to arrange for equipment cleaning and inspection before entering park.</p> <ul style="list-style-type: none"> <li>- Thoroughly clean and inspect equipment exhibiting any dirt, mud seeds or other potential contaminant attached to frame, tires, wheels, or other parts to minimize the introduction of non-native plants.</li> <li>- Trained park staff will inspect equipment before entering the park. Areas inspected will include, but not be limited to, tracks, track guard/housings, belly pans/under covers, buckets, rippers, and other attachments. Equipment that does not pass inspection will be turned around to the nearest cleaning facility outside the park. Re-clean equipment before returning to the project or staging area if it is removed from the general vicinity of the project or staging area.</li> <li>- Before moving vehicles or equipment to a new job site within the park, visually inspect and clean thoroughly to remove all mud, dirt, and plant parts.</li> </ul>
<b>Biological</b> Species of Special Concern or Their Habitat	Potential	<p>Issue: Potential impacts to special status species.</p> <p>Impact: Project Manager/Contractor will adhere to July 18, 2019 Biological Opinion for Road Maintenance and Rehabilitation Projects in Yosemite NP.</p> <p>To protect the Sierra Nevada yellow-legged frog, replace the 36" culvert at Summit Meadow with a 60" pipe, 1/3 embedded. Conduct biological monitoring at the site during culvert removal and replacement.</p>
<b>Biological</b> Vegetation	None	Revegetation crews will revegetate disturbed roadside areas and obliterated pull-outs.
<b>Biological</b> Wildlife and/or Wildlife Habitat	Potential	Impact: To mitigate potential impacts, contractor will adhere to July 18, 2019 Biological Opinion for Road Maintenance and Rehabilitation Projects in Yosemite NP.

including terrestrial and aquatic species		
<b>Cultural</b> Archeological Resources	Potential	Issue: Potential impacts to archeological sites.  Impact: The project will avoid adversely affecting existing archeological sites by avoiding ground disturbance within these site boundaries, including restricting parking on abandoned road features including the Old Glacier Point Road alignment.
<b>Cultural</b> Cultural Landscapes	Potential	Impact: Continue consultation with Cultural Resources Program Manager during construction to ensure the visual and physical effects of the road widening for safety purposes do not adversely affect the character of the road corridor.
<b>Cultural</b> Ethnographic Resources	Potential	Issue: Potential impacts to ethnographic resources  Impact: A tribal monitor will be present for ground disturbing activity.
<b>Cultural</b> Museum Collections	None	
<b>Cultural</b> Prehistoric/historic structures	None	See assessment of effect form.
<b>Geological</b> Geologic Features	None	
<b>Geological</b> Geologic Processes	None	
<b>Lightscares</b> Lightscares	None	
<b>Other</b> Human Health and Safety	Potential	Issue: Road construction areas are a high safety concern.  Impact: The park will close the road to private vehicles during the first year of construction to avoid visitor/construction conflicts. The contractor will operate with 30-minute closures during the second year. The contractor will follow standard Federal Highways Administration construction safety practices. Contractor will submit a Safety Plan for approval prior to beginning work.
<b>Other</b> Operational	Potential	Issue: Multiple operational issues will arise related to closing of the road for the summer.  Impact: The NPS core interdisciplinary team will identify and work through operational issues well in advance of the project.
<b>Other</b> Other	Potential	Issue: Construction-related spills  Impact: The contractor will submit a Hazardous Materials Management and Spill Treatment Plan for approval prior to construction.
<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: Potential short-term sound-related issues.
<b>Viewsheds</b> Viewsheds	Potential	
<b>Visitor Use and Experience</b> Recreation Resources <i>Trail use</i>	Potential	Issue: Access to trail systems  Impact: The park will minimize impacts by keeping trail systems open with alternate access routes outside work zones. The park will publish a map of alternate trail access routes.
<b>Visitor Use and Experience</b> Visitor Use and Experience <i>Visitor Experience</i>	Potential	Issue: A primary scenic view will be closed to vehicle access for one summer/fall season.  Impact: Completely closing the road for one summer/fall season will shorten the total years needed for construction and protect the safety of visitors and workers. The core team will work to inform affected parties, including park visitors, well in advance of project impacts on visitors.
<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	Potential	Issue: It may be necessary to install riprap in culvert outflows to dissipate water. This may be considered placement of fill into an Other Water of the U.S.  Impact: The park will follow mitigation measures in Clean Water Act permits (Section 404/401)
<b>Water</b> Wild and Scenic River	None	
<b>Wilderness</b>	None	



# ASSESSMENT OF ACTIONS HAVING AN EFFECT ON HISTORIC PROPERTIES

## A. DESCRIPTION OF THE UNDERTAKING

1. **Park:** Yosemite National Park

### 2. Project Description

**Project Name:** Glacier Point Road Rehabilitation

**Prepared by:** Kimball Koch    **Date Prepared:** 9/23/2019    **Telephone:** 209.379.1226

**PEPC Project Number:** 85978

**Location:** Mariposa, CA

**Describe the project:** See Categorical Exclusion Form

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

The APE extends along Glacier Point Road from Badger Pass to Glacier Point including adjacent parking areas, pullouts, and trailheads. Generally, work will only be visible within about 100 feet of the edge of the roads, turnouts, and other parking areas because of the forested nature of the road corridor. The roadwork will not be visible from Yosemite Valley. The new wall constructed at the Clark Range Overlook would replace the existing wall, which would be marginally visible from the distant wilderness areas along the Clark Range. Work along the hairpin curves near Glacier Point would be visible from the roadway and adjacent trails but would not be visible from outside the immediate road corridor. Construction within the Glacier Point parking lot would not be visible from areas outside of the parking area.

The vertical APE is primarily limited to the previously disturbed areas associated with the existing road bed. For road resurfacing, the vertical APE will not exceed six inches in depth. For the more extensive work at trailheads, overlooks and rehabilitation areas, the vertical APE would not exceed the following:

- Curve widening along the hairpin curves approaching Glacier Point: (six inches in depth)
- Relocation of the retaining wall at the Clark Range Overlook (18 inches in depth)
- Repair of the slumping conditions at the road segment west of Summit Meadow (backfill seven inches in depth),
- Grading for the new Sentinel Dome Parking (five inches deep), and
- Grading to pave the McGurk Meadows trailhead parking (12 inches in depth).

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

No

X Yes

### 4. Potentially Affected Resource(s)

**Archeological Resources Present:** Yes

**Archeological Resources Notes:** Archeological sites located within and near the road in areas of proposed construction include the following: CA-MRP-164, -167, -223/224, -679, -682, -683, -1525H, and -2372/H. Sites CA-MRP-164, -167, -223/224, -679, -682, and -683 have included subsurface investigations (Hull:1990), while the remaining sites have been documented based on more recent surface surveys completed by park staff. The report associated with subsurface investigations at CA-MRP-164, -167, -223/224, -679, -682, and -683 recommended that all the sites were eligible under Criterion D. However, this report did not include a formal nomination considering all NRHP Criteria. Until such time that the park can update the criteria assessment, the park requested and received SHPO concurrence that these sites be treated as historic resources for the purpose of addressing NHPA Section 106 compliance requirements.

The Old Glacier Point Road, CA-MRP-1525H, is an abandoned road that was evaluated and recommended eligible under Criteria A, B, C, and not D (Nave: 2000). However, this evaluation has not yet been submitted to SHPO for concurrence. The park is anticipating submitting that determination of eligibility for SHPO review associated with a water tank installation

project in the near future. In the interim and for the purposes of this project, the park requested and received SHPO concurrence that the Old Glacier Point Road be treated as a historic resource for the purpose of addressing NHPA Section 106 compliance requirements.

The project will avoid adversely affecting existing archeological sites by restricting parking on abandoned road features including the Old Glacier Point Road alignment. The park archeologist assessed the undertaking as no adverse effect to known archeological resources.

**Historical Structures/Resources Present:** Yes

**Property Name:** Glacier Point Road Historic District **LCS:**

**Property Name:** Badger Pass Ski Area **LCS:**

**Historical Structures/Resources Notes:** Also included within the project area: Glacier Point Trailside Museum-National Register 1978

**Cultural Landscapes Present:** Yes

**Property Name:** Badger Pass Ski Area **LCS:**

**Property Name:** Glacier Point Road Historic District **LCS:**

**Ethnographic Resources Present:**

**Ethnographic Resources Notes:** The park notified traditionally associated American Indian tribes and groups in a letter on April 29, 2019, requesting review and comment within 30 days of the project. To date, the tribes have not identified any historic properties with religious and cultural significance that would be affected by the project, nor have they provided any comments or identified any concerns regarding the project.

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

Yes	Destroy, remove, or alter features/elements from a historic structure
Yes	Replace historic features/elements in kind
Yes	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:** Kimball Koch

**Date:** 09/23/2019

*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:** Per HLA: Continue consultation with Cultural Resources Program Manager during construction to ensure the visual and physical effects of the road widening for safety purposes do not adversely affect the character of the road corridor. Per Anthropologist: Tribal monitoring will occur for ground disturbing activities.

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

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**[ X ] Anthropologist**

**Name:** Scott Carpenter

**Date:** 09/23/2019

**Comments:** No comments/concerns received from tribes (April 29, 2019 tribal spreadsheet).

*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:** Tribal monitoring will occur for ground disturbing activities.

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

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**[ X ] Archeologist**

**Name:** Wesley Wills

**Date:** 09/23/2019

**Comments:** Archeological sites located within and near the road in areas of proposed construction include the following: CA-MRP-0164, -0167, -0223/224, -0679, -0682, -0683, -1525H, and -2372/H. The project will avoid adversely affecting existing archeological sites by avoiding ground disturbance within these site boundaries, including restricting parking on abandoned road features including the Old Glacier Point Road alignment (CA-MRP-1525H). The park archeologist assessed the undertaking as having no adverse effect to known archeological resources.

*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:** Crews will follow instructions to avoid ground disturbance within known archeological sites CA-MRP-0164, -0167, -0223/224, -0679, -0682, -0683, -1525H, and -2372/H. This includes restricting parking on abandoned road features including the Old Glacier Point Road alignment (CA-MRP-1525H).

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

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**[ X ] Historian**

**Name:** Scott Carpenter

**Date:** 09/23/2019

**Comments:** No historical architect review required; no buildings affected.

*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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[  ] **Historical Landscape Architect**

**Name:** Kimball Koch

**Date:** 04/03/2019

**Comments:** The NPS project manager has been working closely with FHWA designers to identify and avoid adverse effects while addressing critical safety issues within the historic road corridor. Changes are being made to those road features that have been assessed as perpetuating unsafe conditions (e.g. narrow overlook parking widths, curve widening) but are being made using in-kind materials while maintaining the historic alignment and character of the road. Design changes are consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes.

*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:** Continue consultation with Cultural Resources Program Manager during construction to ensure the visual and physical effects of the road widening for safety purposes do not adversely effect the character of the road corridor.

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

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**No Reviews From:** Curator, Historical Architect, 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:

[  ] **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:** Jul 31, 2019

**SHPO Received:** September 19, 2019

**THPO Required:** Yes

**THPO Sent:** Apr 29, 2019

**THPO Received:**

**SHPO/THPO Notes:** Tribes consulted April 29, 2019; no concerns/issues identified.

**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:

- Continue consultation with the NPS Cultural Resources Program Manager during construction to ensure the visual and physical effects of the road widening for safety purposes do not adversely affect the character of the road corridor.
- Conduct tribal monitoring during ground disturbing activities.
- Follow instructions to avoid ground disturbance within known archeological sites. This includes restricting parking on abandoned road features including the Old Glacier Point Road alignment.

**6. Assessment of Effect Notes:**

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

**Acting NHPA Specialist** Madelyn Ruffner

1/27/2020

**Specialist**

Madelyn Ruffner

**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.

**Acting Superintendent:** Cicely Muldoon

**Date:** 1/30/2020

**Superintendent:**

Cicely Muldoon

# Glacier Point Road Rehabilitation – Summary of Public Comments

## November 2, 2019

This document summarizes the comments received during the public planning process for the Glacier Point Road Rehabilitation project, which is slated for construction in 2021/2022. The park announced the public comment period from mid-August 2019 through September 19, 2019 via a news release to media outlets, emails through the park's Eblast system, and park social media. Several newspapers picked up the project announcement including the Mariposa Gazette, the Sierra Sun Star, the Fresno Bee, and the San Francisco Examiner. During the public comment period the park hosted a public meeting on August 28, 2019 attended by about 40 participants and a webinar on September 4, 2019 attended by about 20 people. This summary includes written comments received during the public comment period and comments raised during the presentation during the public meeting and webinar. The park received 27 comments from individuals along with comments at the webinar and the public meeting. Comments included suggestions for road enhancements, safety improvements, and increased access during construction.

A number of commenters asked whether the park could add a bike lane alongside the vehicle lanes. The planning team considered this suggestion and concluded that the park cannot move forward with this idea at this time for the following reasons:

- Quantity of resource impacts: Adding a bike lane alongside the road translates to exponentially more cut and fill impacts below the road. For example, adding a 4-foot wide bike lane in each direction east of Badger Pass requires a 94-foot wide disturbance section at the foot of the slope, whereas under the current scope of rehabilitating the existing road it will require a 28-foot wide disturbance section.
- High value of natural and cultural resources: The natural and cultural resources adjacent to the Glacier Point Road include federally-listed wildlife species, montane meadows, rare plants, and archeological sites. To widen the roadbed, even without consideration of widening at the foot of slopes, would entail destruction of many acres of high valued habitat and resources.
- High cost: In 2004, engineers estimated the cost of adding a bike lane to be about one million dollars a mile. In 2021, the total cost would be more than double the expected cost of the existing project.
- Adverse effects to historic properties: Widening the road to the degree specified would likely cause an adverse effect to multiple historic properties within the Glacier Point Road historic district including sensitive archeological sites. The National Park Service (NPS) must strive to avoid these adverse effects. In addition, these effects could significantly delay the project as the park negotiates an agreement between the NPS and the State Historic Preservation Office.

The park will incorporate the following items into the project per public comments:

- Construction workers will allow access to first responders.
- The park will continue consultation with traditionally associated American Indian tribes and groups of Yosemite throughout the project.
- The park will provide access for people with limited mobility at the Glacier Point bus drop-off.
- The park will construct a short trail from new parking at Sentinel Dome to the Taft Point trail.

A number of commenters offered alternative methods to access Glacier Point during the first year road closure. Several people asked whether shuttle buses and/or concession tour buses could operate during the closure. If the park allows occasional one-lane access during the closure, it would add another year of construction work (three years total). Condensing work into two years is one of the main reasons for the complete closure. For example, an 800-foot road section needs to be excavated about five feet deep on the slope heading east to Summit Meadow.

To do this one lane at a time would require considerable more time and work and create hazardous conditions for workers and visitors.

There were several questions regarding conditions and logistics for hikers during the 2021 road closure. Toilets will be available to hikers at Glacier Point, but there will be no drinking water. Trails to Glacier Point will remain open but hikers must remain outside the work zone. The park will develop a trails information hand-out with logistics for hiking during the closure.

Commenters asked whether the park could move the Glacier Point Starry Sky program during the 2021 closure. Yosemite will continue to provide night sky programs at Crane Flat, Tuolumne Meadows, and Yosemite Valley (provided by the concessioner) during the closure, but will not relocate the Glacier Point program for that year.

Commenters asked about access to Bridalveil Campground during the first year closure. The park plans to upgrade the water storage and distribution system at the Bridalveil Campground during the full road closure in 2021. This work requires a complete campground closure and it is fortunate that both projects could be timed during the same year.

Commenters recommended a number of specific changes to parking areas. One commenter suggested expanding the Glacier Point parking lot at the west end curve for cars and recreational vehicles under 30 feet long. While not immediately apparent, this area serves as a drainage and is not a viable location for additional parking. One commenter asked to reduce traffic congestion at the Glacier Point parking area by converting the walkway side to parallel instead of angled parking, paint a lane divider, add signage, or reduce the angle of the parking spaces. All these solutions would take away parking spaces, and accommodating vehicles is a high priority for the park. Commenters asked to leave room for six cars across from the Sentinel Dome parking area. The park will accommodate these cars at the new Sentinel Dome Parking area to protect fragile vegetation and soils.

Some commenters asked for operational changes to accommodate buses. Commenters asked if the park could allow bigger buses on the road. This action is not planned as part of this project. Commenters asked if the park could provide room for buses to park at the Mono Meadows trailhead to allow for hiker drop-off. While the park acknowledges this would be desirable, the project team and engineers determined there is not a safe place on the road for bus parking and expanding the existing parking lot would cause extensive resource impacts.

One commenter asked how the park will protect wildlife. The project incorporates many ways to protect wildlife. First, the park has been consulting with the U.S. Fish and Wildlife Service to protect the listed Sierra Nevada yellow-legged frog and the Yosemite toad. The Service approved a Biological Opinion with conservation measures to protect these amphibians. Speed will be reduced in areas to safeguard protected birds and night work will be limited in owl habitat. There are a number of additional mitigation measures that will be in the construction contract to protect wildlife such as requirements for food storage.

Commenters noted that the park is already overcrowded and asked how the park will compensate for the displaced use during the road closure and potential impacts. This is a challenging question. The park plans a number of construction projects in 2021 in addition to the Glacier Point Road, including construction on the Tioga Road, construction to improve several campgrounds, and improvements at the Bridalveil Falls parking area and restrooms. Traffic flow and access will be compromised in the short-term during the 2021 construction period.

Lastly, commenters requested that the park improve project communication. The park concurs and will endeavor to provide accessible, up-to-date information on the project and how it could impact visitors.

### **Out of Scope**

Many people commented on issues outside the defined scope of the Glacier Point Road Rehabilitation project. These comments include requests for more shuttle buses including a hiker bus and sunset bus. Commenters asked to utilize Badger Pass as parking and shuttle bus staging during the summer, and add a visitor contact center at Badger Pass. People asked for railings at Taft Point and increases in Half Dome permits. Commenters asked for larger-scale studies to improve traffic flows. They asked for visitor quotas and restrictions on buses over 30 feet long, with the exception of concessioner buses (this restriction is already in place). The Glacier Point planning

team has passed these recommendations to appropriate park staff.

The NPS appreciates the meaningful and thoughtful public comment on this important project.

Conservation Measures from the Biological Opinion - Yosemite National Park's Road Maintenance and Rehabilitation Projects for the Sierra Nevada Yellow-legged Frog and Yosemite Toad - July 18, 2019

**Appendix I. Conservation Measures**

<b>Conservation or Mitigation Measure</b>	<b>Responsibility</b>	<b>Critical Milestones</b>
<b>CONSTRUCTION MITIGATION MEASURES</b>		
Prevent the introduction of exotic species in the project area and staging areas. Prior to entry into the park, steam-clean heavy equipment to prevent importation of non-native plant species. Tighten hydraulic fittings, ensure hydraulic hoses are in good condition (and replace if damaged), and repair all petroleum leaks. Ensure all earth moving equipment enters the Park free of dirt, dust, mud, seeds, and other potential contaminants. Ensure the park inspects all heavy equipment entering the park prior to commencing work.	Yosemite National Park, Contractor	Prior to and concurrent with project activities.
Inspect project boundaries to ensure that impacts stay within the project area and do not extend beyond the scope of the environmental impact statement. Ensure that the project conforms to applicable permits or project conditions. Store all construction equipment within the delineated work limits.	Yosemite National Park, Contractor	Prior to and concurrent with project activities.
Implement compliance monitoring to ensure that the project remains within the parameters of National Environmental Policy Act and National Historic Preservation Act compliance documents.	Yosemite National Park, Contractor	Concurrent with project activities.
NPS will provide a link for contracted construction workers to a Yosemite education and orientation video (or other presentation). This video contains information on sensitivities, special concerns, and regulations to follow when working in Yosemite National Park.	Yosemite National Park	Prior to project activities.
Prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) for construction activities to control surface run-off, reduce erosion, and prevent sedimentation from entering water bodies during construction, if required by federal and State permits. If prepared by a contractor, submit the SWPPP for park review and approval prior to construction. The plan will: Include measures to control erosion, sedimentation, and compaction, and thereby reduce water pollution and adverse water quality effects. Use silt fences, sedimentation basins, etc. in construction areas to reduce erosion, surface scouring, and discharge to water bodies.	Yosemite National Park, Contractor	Prior to and concurrent with project activities.
To the extent possible, schedule the use of mechanical equipment during periods of low precipitation to reduce risk of accidental hydrocarbon leaks or spills. When mechanical equipment is necessary outside of low precipitation periods, use NPS-approved methods to protect soil and water from contaminants.	Yosemite National Park, Contractor	Prior to and concurrent with project activities.
Develop and implement a comprehensive Spill Prevention/Response Plan that complies with federal and state regulations and addresses all aspects of spill prevention, notification, emergency spill response strategies for spills occurring on land and water, reporting requirements, monitoring requirements, personnel responsibilities, response equipment type and location, and drills and training requirements. Submit the spill prevention/response plan to the park for review/approval prior to commencement of construction activities.	Contractor	Prior to project activities.
Prepare a construction work schedule that minimizes effects on wildlife (see Wildlife section below) and avoids periods with high levels of visitation. Submit the work schedule for park review and approval prior to construction.	Contractor	Prior to and concurrent with project activities.
Supervisory construction personnel will attend an environmental protection briefing (preconstruction briefing) provided by the NPS, prior to working on site. The briefing will familiarize workers with statutory and contractual environmental requirements and protection measures for archeological sites, sensitive habitats, water resources, and wildlife habitats.	Contractor	Prior to and concurrent with project activities.
<b>HYDROLOGY AND WATER QUALITY</b>		
Construct barriers or use silt fencing to prevent the discharge of turbid water in excess of specified limits when working near streams.	Contractor	Prior to and concurrent with project activities.
Stabilize all disturbed soil and fill slopes in an appropriate manner.	Contractor	Prior to and concurrent with project activities.
Store equipment and materials away from all waterways.	Yosemite National Park, Contractor	Concurrent with project activities.
Clearly delineate construction limits with construction fencing near wetlands.	Contractor	Prior to and concurrent with construction activities.

<b>Conservation or Mitigation Measure</b>	<b>Responsibility</b>	<b>Critical Milestones</b>
Ensure all actions are consistent with Clean Water Act Section 401 and 404 permit requirements.	Contractor	Prior to and concurrent with project activities.
Contain wastewater contaminated with silt, grout, or other by-products from construction activities in a holding or settling tank to prevent contaminated material from entering watercourses.	Contractor	Concurrent with project activities
Remove hazardous waste materials generated during implementation of the project from the project site immediately. Dispose of volatile wastes and oils in approved containers for removal from the project site to avoid contamination of soils, drainages, and watercourses. Keep absorbent pads, booms, and other materials onsite during projects that use heavy equipment to contain oil, hydraulic fluid, solvents, and hazardous materials spills.	Contractor	Concurrent with project activities
Design new and abandoned utility corridors through meadow and wetland areas to retain natural surface and subsurface flows through the area as possible.	Yosemite National Park, Contractor	Concurrent with project activities
Design surface drainage facilities to transport runoff in a non-erosive manner.	Yosemite National Park, Contractor	Prior to and concurrent with project activities.
Properly maintain structures and fill areas to avoid adverse impacts on aquatic environments or public safety.	Yosemite National Park, Contractor	Prior to, concurrent with and following project activities.
Collect and cover material from construction work, and avoid depositing it where it could be eroded and carried to tributaries or the river by surface runoff or high stream flows.	Contractor	Concurrent with project activities
Minimize disturbance on riverbanks and streambanks. Salvage excavated native materials and replace if possible after construction. Restore riverbanks to prevent erosion.	Contractor	Concurrent with project activities
At utility corridors, provide adequate drainage to prevent surface water or subsurface seepage from saturating the subgrade utility corridor.	Contractor	Concurrent with project activities
Drain and flush all pumps, tanks, live wells, buckets and other containers that might carry water contaminated with exotic plants and animals, such as the zebra mussel, prior to bringing equipment into the park.	Contractor	Prior to project activities.
Conduct work such as maintenance of bridge footings and culvert replacement at low flows when possible.	Contractor	During project activities
<b>VEGETATION AND WETLANDS (INCLUDING SPECIAL STATUS PLANTS)</b>		
Employ measures to prevent or control spills of fuels, lubricants, or other contaminants from entering the waterway or wetlands.	Contractor	Prior to project activities
Avoid heavy equipment use in wetlands to the extent possible. Place heavy equipment used in wetlands on mats, or take other similar measures to minimize soil and plant root disturbance and to preserve the preconstruction topography of the wetland.	Yosemite National Park, Contractor	Prior to and concurrent with project activities.
Whenever possible, place excavated material on an upland site. When this is not feasible, stockpile excavated material on a temporary basis on filter cloth, mats, or other semi-permeable surface, or take comparable measures to ensure that underlying wetland habitat is protected. Stabilize material with straw bales, filter cloth, or other appropriate means to prevent reentry into the waterway or wetland.	Yosemite National Park, Contractor	Concurrent with project activities
Remove temporary soil stockpiles in wetlands in their entirety as soon as practicable. Return wetland areas temporarily disturbed by stockpiling or other activities to their pre-existing topography and soil configurations. Restore wetland soil, hydrology, and native vegetation as soon as practicable.	Yosemite National Park, Contractor	Concurrent with project activities
Ensure that a Park Botanist oversees placement of construction fencing to avoid impacts to sensitive plants and wetlands.	Yosemite National Park, Contractor	Prior to and concurrent with project activities.
Conduct preconstruction surveys to identify special status species within the construction disturbance zone. If special status plant species are identified within the construction disturbance zone, the project manager will work with the Park Botanist to avoid impacts.	Yosemite National Park, Contractor	Prior to and concurrent with project activities.
Delineate, clearly mark, and ensure all wetland-related permits are in place prior to work. Perform activities in wetlands in a cautious manner to prevent damage caused by equipment, erosion, siltation, etc.	Yosemite National Park, Contractor	Prior to and concurrent with project activities.
Minimize shade impacts to the extent practicable when designing boardwalks and similar structures.	Yosemite National Park, Contractor	Prior to and concurrent with project activities.

<b>Conservation or Mitigation Measure</b>	<b>Responsibility</b>	<b>Critical Milestones</b>
<p>Ensure that all earth moving equipment and hand tools enter the park free of mud or seed-bearing material to prevent the introduction of non-native plants. The NPS will inspect all equipment prior to use on the project.</p> <p>Map and treat noxious weeds prior to construction. Certify all seeds and straw material as weed-free. Ensure that imported top-soil is weed-free. The NPS will approve sources of imported fill material that will be used within the top 12 inches of the finished grade. Monitor and treat invasive plants for three years post-construction.</p>	Yosemite National Park, Contractor	Prior to, concurrent with and following project activities.
<p>Install temporary fencing (black silt fencing or orange construction fencing) per construction documents to protect natural surroundings (including trees, and root zones) from damage. Avoid fastening ropes, cables, or fences to trees.</p>	Yosemite National Park, Contractor	Prior to and concurrent with project activities.
<p>Use native seed mix or seed-free mulch to minimize surface erosion and the introduction of noxious weeds.</p>	Contractor	Concurrent with project activities.
<p>Where actions could impact wetlands, wetland restoration proposals must, at a minimum, provide one-for-one (1:1) wetland function replacement (i.e., no net loss of wetland functions).</p>	Yosemite National Park	Prior to project activities.
<p>Delineate wetlands in project areas prior to project implementation.</p>	Yosemite National Park	Prior to project activities.
<b>WILDLIFE (INCLUDING SPECIAL STATUS WILDLIFE)</b>		
<p>Schedule construction activities with consideration of wildlife lifecycles to minimize impacts during sensitive periods. The NPS will provide information, Best Management Practices, and specifications to the contractor regarding protection of special status species wildlife at project briefings to avoid activities that are destructive to wildlife and habitats.</p> <p>Limit work in bird nesting habitat from March through August. If it is not possible to adhere to this timeframe, bird surveys must be conducted within one week of the start of the work.</p> <p>To protect bats, limit tree work to the period between mid-April and mid-May and mid-August to the end of October. All other times, delay work until a qualified biologist determines the action would not adversely affect bat survival or survival of young.</p> <p>Always talk with aquatic ecologist when working in meadows, ponds, lakes, or other riparian habitat.</p>	Yosemite National Park, Contractor	Prior to project activities.
<p>Contact the park aquatic ecologist if work will take place in critical habitat or habitat where federally listed species could occur. Biologist will conduct pre-work surveys to identify areas that the Federally-listed Sierra Nevada yellow-legged frog, Yosemite toads, and California red-legged frog may occupy such as riparian habitat or adjacent upland habitat. Minimize potential impacts by delaying the project start dates until after breeding or after upland migration, if necessary, per wildlife biologist guidance.</p>	Yosemite National Park, Contractor	Prior to and concurrent with project activities.
<p>Construction personnel will adhere to park regulations concerning food storage and refuse management. All food will be properly stored during the workday and will be removed from the site at the end of each work day.</p>	Yosemite National Park, Contractor	Concurrent with project activities.