

# Yosemite National Park

National Park Service  
U.S. Department of the Interior



## The Ahwahnee Comprehensive Rehabilitation Plan

Public Comment and Response Report  
November 2011



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## **Introduction**

This report summarizes public comments submitted on *The Ahwahnee Comprehensive Rehabilitation Plan Environmental Assessment* (EA) and responses to those comments. The National Park Service released the Ahwahnee Comprehensive Rehabilitation Plan EA for public review from July 21, 2011, through August 23, 2011. Public comment letters on the proposed plan were received by mail or electronically through the Planning, Environment, and Public Comment (PEPC) website at <http://parkplanning.nps.gov/AhwahneeRehab>. This report provides a summary of public concerns expressed in those comment letters and park responses to substantive comments. Public concerns did not result in any changes to the alternatives presented in the EA or the proposed action.

## **Public Comment Analysis Methodology**

The National Park Service reviewed and analyzed public comments received during the comment period in a series of stages. Each letter was read to determine discrete points expressed by the author, each of which was considered to be a “comment.” Each discrete comment was then coded to associate that comment with a particular resource topic or element of the Comprehensive Rehabilitation Plan (such as Purpose and Need or Alternatives).

Once all letters were coded for individual comments, similar comments were grouped together, and a “concern statement” was generated, which is intended to capture the main points or common themes expressed by the group of similar comments. The concern statements were then screened to determine whether or not further clarification was needed, or whether modification of the proposed action was necessary. No public concerns resulted in modification of the proposed action.

Lastly, the project team prepared responses to comments considered ‘substantive.’ Substantive comments are those that:

- question, with reasonable basis, the accuracy of information in the EA
- question, with reasonable basis, the accuracy of environmental analysis
- develop and evaluate reasonable alternatives other than those presented in the EA
- cause changes to the proposal or alternatives
- suggest factual corrections

All comments received during the public comment period have been duly considered by the National Park Service and are now part of the administrative record for this project. The full text of public comments can be viewed on the project website at [http://www.nps.gov/yose/parkmgmt/ahwahnee\\_rehab.htm](http://www.nps.gov/yose/parkmgmt/ahwahnee_rehab.htm). Personal information included with the comments (e.g., names and contact information) has been redacted in the online version to protect authors’ privacy.

## **Results of Public Comment Analysis**

During the 34-day public comment period, the park received 9 public comment letters from 1 tribal group, 1 agency, and 7 individuals. The analysis of these letters identified 15 discrete comments, from which 9 general concern statements were generated. Four of the concerns were identified as substantive.

## **Using This Report**

This report presents public concerns organized by topic, along with “supporting quotes,” which are verbatim excerpts from individual public comment letters. These supporting quotes are followed by whether the comment author was an individual or an organization (with a general description of the organization type) and the assigned letter number. For example, “(Individual, #2)” is a comment from an individual who is unaffiliated with any organization and who submitted the second letter received.

Concerns that were considered substantive include a response from the project team. Substantive concerns and responses are listed first under each topic, followed by non-substantive concerns. Responses are not provided for non-substantive concerns (e.g., comments that oppose the proposed action but do not provide a substantive rationale, comments that do not meet the requirements listed above).

Following the list of public concerns and responses to substantive comments, this report also presents a short summary of comments considered beyond of the scope of this planning effort.

## **Public Concerns and Responses**

### **Purpose and Need for Action**

**Concern 1: The National Park Service has incorrectly identified seismic stability as a needed action for the comprehensive rehabilitation plan.**

*“The likelihood of a significant Seismic event, in this Sierra environment, is highly unlikely. Expenditures in this area is excessive Tax spending.”*

(Individual, #2)

**Response:** As noted in Chapter 1 of the EA, this plan conforms with the Interagency Committee on Seismic Safety and Construction Recommended Practice 6 (RP6). The RP6 was developed in conjunction with the National Institute of Standards and Technology in response to Public Law 101-614: The National Earthquake Hazards Reduction Program and Reauthorization Act and pursuant to Executive Order 12941: Seismic Safety of Existing Federally Owned or Leased Buildings. RP6 identifies the triggers for when seismic rehabilitation of federal buildings is required and provides evaluation and mitigation requirements. Per section 2.1(b) of RP6, because this plan has the potential to “significantly extend the building’s useful life through alterations or repairs which total more than 30% of the replacement value of the facility,” a seismic evaluation and rehabilitation following the provisions of RP6 was required.

A seismic evaluation of The Ahwahnee hotel, cottages, and dormitory was performed in 2010. Results of this evaluation indicated that there are some inherent qualities of the hotel and cottages that might present safety hazards to visitors and employees in the event of a 500-year or 2,500-year earthquake as described in the “Geologic Hazards” Affected Environment section of the EA. The results of this evaluation were used to develop alternative options for meeting seismic standards. Alternatives 1 and 3 (the preferred alternative) represent the minimum amount of structural stabilization required to address seismic safety concerns and meet RP6 objectives.

**Concern 2: The National Park Service has correctly identified fire/life-safety as needed actions for the comprehensive rehabilitation plan.**

*“Fire/life and Safety valid areas of improving existing conditions of the Ahwahnee.”*  
(Individual, #5)

**Concern 3: The comprehensive rehabilitation plan is needed to correct deteriorating conditions at The Ahwahnee.**

*“While reading The Ahwahnee Comprehensive Rehabilitation Plan, I became increasingly shocked about the condition that the Ahwahnee is in. Many of the issues are not evident to a visitor and it is horrible that such an iconic building has been so poorly maintained that it has gotten to this condition.”*  
(Individual, #4)

## Alternatives

**Concern 4: The National Park Service should provide the design plans for the code-required emergency access road and culverts when they are available.**

*“There is one section that I would like to see more information on and that is the Code-Required Emergency Access Road and Culverts. I am concerned about the size and appearance of the bridge that might be needed and the impact of the bridge and of a larger, gravel access road would have on the scenic values of that area. I understand that more studies are needed until a design plan is decided on and I would like to be able to see those plans and what visual impacts there will be.”*  
(Individual, #4)

**Response:** Once funding becomes available for implementation of the code-driven fire access actions at the cottages, further design development will determine exact specifications for the drainage crossings and road improvements. Although it is unknown when implementation of these actions will occur, these actions will likely occur during early phases of rehabilitation as they are code-driven. Designs will be compatible with the character of the historic landscape and will be subject to review by the State Historic Preservation Officer as stipulated in the 2011 Programmatic Agreement for the plan. The designs will also be in compliance with the Merced Wild and Scenic River Comprehensive Management Plan. Updates on the implementation of The Ahwahnee Comprehensive Rehabilitation Plan will be communicated through ways such as the project website ([http://www.nps.gov/yose/parkmgmt/ahwahnee\\_rehab.htm](http://www.nps.gov/yose/parkmgmt/ahwahnee_rehab.htm)), the Yosemite Daily Report, and the park’s electronic planning newsletter. Additional details on the implementation of actions can also be requested by emailing [YOSE\\_Planning@nps.gov](mailto:YOSE_Planning@nps.gov).

**Concern 5: The National Park Service has correctly identified Alternative 3 as the preferred alternative.**

*“I support your choice of Alternative 3 since it offers the best plan to repair and maintain one of the most beautiful buildings in the National Park system.”*  
(Individual, #4)

*“I concur with Alternative three (3) Preferred.”*  
(Individual, #6)

**Concern 6: The National Park Service should select Alternative 1 as the preferred alternative.**

*"I prefer alt 1--minimal changed.....especially visuals."*  
(Individual, #1)

**Concern 7: The National Park Service has not properly controlled costs on the NPS-preferred alternative (Alternative 3).**

*"Alternative 3 (Preferred) appears to express a 'carte blanc' cost to the Ahwahnee's 'improvement'. I see no controls on expenditures, but rather an open interpretation to Rehabilitation."*  
(Individual, #5)

**Response:** The actions in the comprehensive rehabilitation plan are primarily code-driven. Alternative 3, the preferred alternative, was developed using cost as factor in selecting actions from both Alternatives 1 and 2 that would meet code requirements and provide for historic rehabilitation in a cost-effective manner.

## **Cultural Resources**

**Concern 8: The National Park Service should only reference Mono Paiute American Indian people when referring to the Ahwahneechee people.**

*"Regarding the Ahwahnee Comprehensive Rehabilitation Plan, as the original Native American Indian people of Yosemite we would like the inclusion of the true Ahwahneechee people, the Mono Paiute people, instead of the Southern Sierra Miwuk's who came later after 1851."*

*The word Ahwahnee is not a miwok word, but is a Paiute word. Ahwahnee is a part of Paiute ancestral legend."*  
(Tribal group, #8)

*"As the real indigenous Native people of Yosemite and the true Ahwahnees we request that the Yosemite National Park Comprehensive Rehabilitation Plan not use any reference to Miwok, Mewuk or Miwuk for Ahwahnee, since the Ahwahnees were Mono Paiutes. The reference to the original indigenous Ahwahnees should only be for the Mono Paiute Indian people. All written material, pamphlets and signs should not the Mono and Paiute people as the real Ahwahnees."*  
(Tribal group, #8)

**Response:** The EA provides an ethnographic background for the project area that focuses more generally on the significance of the area to "American Indian tribes and groups." The Ahwahnee Comprehensive Rehabilitation Plan does not address details concerning which tribe or tribal groups were present at specific times or places, or details of their practices. The park consults with seven culturally associated American Indian tribes and groups on a regular basis. As listed in Chapter 4 of the EA, these seven tribes and groups include the American Indian Council of Mariposa County (also known as the Southern Sierra Miwuk Nation), Bishop Paiute Tribe, Bridgeport Paiute Indian Colony, Mono Lake Kutzadikaa Tribe, North Fork Rancheria of Mono Indians, Picayune Rancheria of the Chukchansi Indians, and the Tuolumne Band of Me Wuk Indians. Consultation with these tribes and groups regarding this planning effort was initiated in September 2009 and will continue as specified in the 2011 Programmatic Agreement for the Comprehensive Rehabilitation Plan.

## Wildlife

**Concern 9: The National Park Service should proceed with the comprehensive rehabilitation plan in a manner that is protective of the park's environment and wildlife.**

*“It is important to proceed with this project in a way that is the least detrimental to the Yosemite environment and wildlife. Preserving the historical integrity of the Ahwahnee Hotel is equally important.””*

(Individual, #5)

## Out of Scope Comments

Some comments were expressed that were not within the scope of this plan; therefore, they are not cited in this report. All comments were considered by park staff, and were forwarded to the appropriate personnel for consideration. Out of scope topics included:

- changes to day or overnight use
- retail operations at The Ahwahnee

The full text of all public comment letters is available for review on the project website at:

[http://www.nps.gov/yose/parkmgmt/ahwahnee\\_rehab.htm](http://www.nps.gov/yose/parkmgmt/ahwahnee_rehab.htm).

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