



Letter of Compliance Completion

To: Josh Keyes; Project Manager, Yosemite National Park

From: Cicely Muldoon; Acting Superintendent, Yosemite National Park

Subject: NEPA and NHPA Clearance: 2020_015 Redecorate Ahwahnee Hotel Suites (2018 YH) (PEPC: 84232)

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.

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:

- The SHPO and regional historical architect recommended that the park avoid the use of wall-mount brackets for the installation of televisions in the guest rooms and continue to have televisions placed on top of the furniture. While use of wall-mounting brackets would be reversible, avoiding this action would reduce the effects to this National Historic Landmark building by limiting penetrations of the historic plastered walls. For the smaller rooms, placing the televisions on the furniture would not meet project objectives to achieve hospitality industry standards for hotel room furnishings. An attempt was made to construct brackets that would raise the televisions above the furniture but required additional wall penetrations to stabilize the furniture made top-heavy by the television and brackets. This also did not meet the industry standards for furnishings.
- Please consider painting rather than wallpapering the elevator lobby and choosing bathroom light fixtures that are more compatible with the design of the hotel.
- The park understands that the proposed products may no longer be available from manufacturers. The park requires that any changes to the proposed fabrics, furniture pieces, or fixtures be provided for park review prior to purchasing.

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Superintendent: _____ **Date:** 5/14/2020
Cicely Muldoon



Categorical Exclusion Documentation Form (CE Form)

Project: 2020-015 Redecorate Ahwahnee Hotel Suites (2018 YH)

PEPC Project Number: 84232

Description of Action (Project Description):

JUSTIFICATION: The Suites at the Ahwahnee Hotel are typically refurbished when updates are needed to improve the guest experience per the business practices of the current concessioner. Just as the guest rooms were updated in 2017-18, the Suite rooms are proposed to be updated. The proposed undertaking would include the refurbishment of the spaces consistent to the extent possible with the treatment recommendations in the Ahwahnee Historic Furnishings Report (ARG 2011) and the Ahwahnee Historic Structure Report (ARG 2011). Yosemite Hospitality has contracted with Kollath McCann Creative Services for the design.

SCOPE: • Replace carpet • Paint the rooms (historic stencils would be protected) • Install wallpaper in some locations • Replace wall sconces adjacent to the beds • Mount the flat screened televisions onto the walls in small bedrooms (will include wall penetrations for mounting, electricity and cable access will be run in conduit painted to match wall) • Replace non-historic draperies and hang new ceiling-mount valance similar to guest rooms taking care to avoid damage to historic stencils • Replace and refurbish furnishings in select locations • Replace bathroom light fixtures and hardware

Room 118 "Diggins" (non-historic) Relocate chandelier with painted surface-mounted conduit, re-route co-axial cable around perimeter of the room under new carpet. This arrangement takes better advantage of natural light.

230-232-234 "the Presidential" and 330-332-334 "Third Floor Suite" (contributing, significant spaces in hallways and in the parlors) New furnishings, balcony furniture includes patio heaters and fire table, wall-mount TVs in bedrooms, glass top on reserve property desk

6th Floor Elevator Lobby (contributing) Wallpaper and paint

601 "The Mather" and 607 "The Spencer (contributing) New furnishings

603 "The Sunporch" (significant) Carpeted, refresh bead-chain roller shades with new fabric trim, new sofa, side tables, and table lamps,

605 "The Tressider/Queen's Room (contributing) New sconces and window treatments and new furnishings

602 "The Underwood" (contributing) Replace dresser with new wider piece with 8 drawers, replace Georgian side chair

604 "The Library" (significant) Refresh wood floor, replace wool woven carpets, new sofas and upholstered seating, new credenza with refrigerator

RESPONSE TO HSR RECOMMENDATIONS: Treatment recommendations in the 2011 HSR and 2011 HFR are largely out of scope for this project. The contract requirement to upgrade soft goods does not include accessibility upgrades and site and civil upgrades. The scope of this project does not address plumbing fixtures, ceiling fans, door hardware, wood trim,

structural and mechanical systems, or life safety upgrades. Following is the only treatment recommendation from the HSR that will be addressed:

Colors, patterns, and textures proposed are consistent with the period of significance.

Excerpts from the HFR: "If the hotel operator's future goal is to revive the concept of the historic interior scheme as it was during the period of significance, changes should re-emphasize the polychromatic vibrancy of features, elements, and finishes, re-introduce bold, colorful patterns, and have little impact on original furniture and furnishings. Consideration should be given to the residential character achieved through the use of small-scale furnishings throughout the hotel and the warmth conveyed by comfortable, upholstered seating and Alpujarras and Khilim rugs on the floor and on the walls."

The first phase of work is scheduled to begin in 2020.

Mitigation(s):

- The SHPO and regional historical architect recommended that the park avoid the use of wall-mount brackets for the installation of televisions in the guest rooms and continue to have televisions placed on top of the furniture. While use of wall-mounting brackets would be reversible, avoiding this action would reduce the effects to this National Historic Landmark building by limiting penetrations of the historic plastered walls. For the smaller rooms, placing the televisions on the furniture would not meet project objectives to achieve hospitality industry standards for hotel room furnishings. An attempt was made to construct brackets that would raise the televisions above the furniture but required additional wall penetrations to stabilize the furniture made top-heavy by the television and brackets. This also did not meet the industry standards for furnishings.
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CE Citation: C.4 Routine maintenance and repairs to cultural resource sites, structures, utilities and grounds under an approved Historic Structures Preservation Guide or Cyclic Maintenance Guide; or if the action would not adversely affect the cultural resource.

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.

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

Superintendent:

Date: 5/14/2020

Cicely Muldoon

Extraordinary Circumstances:

If implemented, would the proposal...	Yes/No	Notes
A. Have significant impacts on public health or safety?	No	
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	
C. Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources (NEPA section 102(2)(E))?	No	
D. Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks?	No	
E. Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects?	No	
F. Have a direct relationship to other actions with individually insignificant, but cumulatively significant, environmental effects?	No	
G. 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	
H. 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	
I. Violate a federal, state, local or tribal law or requirement imposed for the protection of the environment?	No	
J. Have a disproportionately high and adverse effect on low income or minority populations (EO 12898)?	No	
K. 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	
L. 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:	2020_015 Redecorate Ahwahnee Hotel Suites (2018 YH)
PEPC Project Number:	84232
Project Type:	Routine Maintenance (ROU)
Project Leader:	Josh Keyes; Project Manager, Yosemite National Park

B. PROJECT DESCRIPTION

See Categorical Exclusion form.

C. RESOURCE IMPACTS TO CONSIDER:

Resource	Potential for Impact	Potential Issues & Impacts
Air Air Quality	None	
Biological Nonnative or Exotic Species	None	
Biological Species of Special Concern or Their Habitat	None	
Biological Vegetation	None	
Biological Wildlife and/or Wildlife Habitat including terrestrial and aquatic species	None	
Cultural Archeological Resources	None	No ground disturbance involved.

Cultural Cultural Landscapes	None	
Cultural Ethnographic Resources	None	
Cultural Museum Collections <i>Government- Assigned Historic Furnishings</i>	Potential	Issue: There is government assigned property that is part of the historic furnishings collection in this area of the Ahwahnee. Furthermore, there are historic furnishings that were originally in these spaces that are currently in storage. The project scope did not include refurbishing items in storage. Plans for retention, restoring, and otherwise following the HFR recommendations are included in the following attachment: 12092019 Project Proposal Suites.pdf
Cultural Prehistoric/historic structures	Potential	<p>Issue: The HFR and HSR were consulted for the development and refinement of this project proposal. Much discussion regarding mounting televisions on the walls which would create new wall penetrations into the historic plaster. Industry standards require the furniture surfaces to be relatively clear of appurtenances and visitor safety requires that televisions be mounted solidly.</p> <p>Wallpaper is not original to the 6th floor elevator lobby but there was a strong feeling that guests needed a distinct and immediate sense of arrival when entering this unique space. Work that was approved prior to having the benefit of the HSR and HFR doesn't justify continuing that approach. It is a space that has been altered over the years so the wallpaper is not a deal breaker, but is definitely not preferred.</p> <p>Off-the-shelf sconces and bathroom light fixtures do not compliment the historic features of the building but did not constitute an adverse effect.</p> <p>Overhead fixtures in the rooms are being custom made to match other fixtures used in the building with the Ahwahnee motif.</p>
Geological Geologic Features	None	
Geological Geologic Processes	None	
Lightscapes Lightscapes	None	
Other Human Health and Safety	None	
Other Operational	Potential	
Other Other	None	
Socioeconomic Land Use	None	

Socioeconomic Minority and low-income populations, size, migration patterns, etc.	None	
Socioeconomic Socioeconomic	None	
Soundscapes Soundscapes	None	
Viewsheds Viewsheds	None	
Visitor Use and Experience Recreation Resources	None	
Visitor Use and Experience Visitor Use and Experience	Potential	Issue: The remodel will require the suite rooms to be removed from service for a week at a time. This will be scheduled to take best advantage of the less busy season in the winter. There is some consideration to coincide with the schedule for the kitchen floor and seismic improvements in December 2022, but the logistics of multiple contractors working on site at the same time may not be optimal.
Water Floodplains	None	
Water Marine or Estuarine Resources	None	
Water Water Quality or Quantity	None	
Water Wetlands	None	
Water Wild and Scenic River	None	
Wilderness Wilderness	None	



ASSESSMENT OF ACTIONS HAVING AN EFFECT ON HISTORIC PROPERTIES

A. DESCRIPTION OF UNDERTAKING

1. **Park:** Yosemite National Park

2. Project Description:

Project Name: 2020-015 Redecorate Ahwahnee Hotel Suites (2018 YH)

Prepared by: Erin Davenport **Date Prepared:** 12/06/2018 **Telephone:** 209-379-1067

PEPC Project Number: 84232

Describe project:

See Categorical Exclusion form.

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

The area of potential effects (APE) for this undertaking is the Ahwahnee Hotel National Historic Landmark.

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

<input type="checkbox"/>	No		
<input checked="" type="checkbox"/>	Yes		
<input type="checkbox"/>	Source or reference:		

4. Potentially Affected Resource(s):

Archeological Resources Present: Yes

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

Archeological Resources Notes: Work is interior to building and no ground disturbance is involved.

Historical Structures/Resources Present: Yes

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

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

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

Cultural Landscapes Present: No

Cultural Landscapes Notes: Work is interior to building and does not affect the cultural landscape.

Ethnographic Resources Present: No

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

No	Destroy, remove, or alter features/elements from a historic structure
Yes	Replace historic features/elements in kind
Yes	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:

[X] 106 Advisor

Name: Madelyn Ruffner

Date: 05/01/2020

Check if project does not involve ground disturbance [X]

Assessment of Effect: ___No Potential to Cause Effect ___No Historic Properties Affected ___X___No Adverse Effect ___Adverse Effect ___Streamlined Review

Recommendations for conditions or stipulations:

Doc Method: Standard 4-Step Process

[X] Anthropologist

Name: Scott Carpenter

Date: 12/10/2019

Check if project does not involve ground disturbance [X]

Assessment of Effect: ___No Potential to Cause Effect ___X___No Historic Properties Affected ___No Adverse Effect ___Adverse Effect ___Streamlined Review

Recommendations for conditions or stipulations:

Doc Method: Standard 4-Step Process

[X] Archeologist

Name: Scott Carpenter

Date: 12/10/2019

Check if project does not involve ground disturbance [X]

Assessment of Effect: ___No Potential to Cause Effect X No Historic Properties Affected ___No Adverse Effect ___Adverse Effect ___Streamlined Review

Recommendations for conditions or stipulations:

Doc Method: Standard 4-Step Process

[X] Historian

Name: Scott Carpenter

Date: 12/10/2019

Check if project does not involve ground disturbance []

Assessment of Effect: ___No Potential to Cause Effect ___No Historic Properties Affected X No Adverse Effect ___Adverse Effect ___Streamlined Review

Recommendations for conditions or stipulations: Limit wall penetrations to minimum number required for attaching television and limited number of framed pieces

Doc Method: Standard 4-Step Process

[X] Historical Architect

Name: Sueann Brown

Date: 02/11/2020

Comments: This project continues the use of the same design previously used for the other hotel guest rooms. My comments for that project were as follows:

"The designers should be given a copy of the Historic Furnishings Report and encouraged to follow the recommendations. Curtains, bedding and carpets should be simplified patterns rather than the bold floral patterns proposed and should be compatible with, rather than over powering, the historic stenciling in the rooms. Light fixtures should also be a simple design selected to be compatible with the historic character of the hotel. Modern expectations would not support replicating the original rooms but it is possible to design modern luxurious rooms with an elegant simplicity compatible with the character of the Ahwahnee and that should be the goal. One of the reasons guests choose the Ahwahnee is it's historic character and the room design should embrace that character.

The proposed changes will have only minor impact on historic materials, resulting in a determination of no adverse effect. The changes will diminish the historic character of the rooms but will not affect more significant public areas. The changes are temporary, generally redone on a cycle of less than every ten years."

Unfortunately not only was the design not revised for those guest rooms, over two years later it is being proposed again, this time for the suites. While this again does not rise to the level of adverse effect due to the limited impact to historic fabric and the fact that the impacts are to the character of the guest rooms rather than the more significant public spaces.

Check if project does not involve ground disturbance []

Assessment of Effect: ___No Potential to Cause Effect ___No Historic Properties Affected X No Adverse Effect ___Adverse Effect ___Streamlined Review

Recommendations for conditions or stipulations: Please consider painting rather than wallpapering the elevator lobby and choosing bathroom light fixtures that are more compatible with the design of the hotel.

Doc Method: Standard 4-Step Process

[X] Historical Landscape Architect

Name: Kimball Koch

Date: 12/10/2019

Check if project does not involve ground disturbance [X]

Assessment of Effect: ___No Potential to Cause Effect X No Historic Properties Affected ___No Adverse Effect ___Adverse Effect ___Streamlined Review

Recommendations for conditions or stipulations:

Doc Method: Standard 4-Step Process

No Reviews From: Curator, Other Advisor

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: Mar 19, 2020
SHPO Received: April 27, 2020

THPO Required: No
THPO Sent:
THPO Received:

SHPO/THPO Notes:

The APE is sufficient to take direct effects into account. However, as the Ahwahnee Hotel is the historic property being affected by the undertaking, it would have been more appropriate to include the entire building in the APE.

Please be advised that under certain circumstances, such as an unanticipated discovery or a change in project description, NPS may have future responsibilities for this undertaking under 36 CFR Part 800.

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:

- The SHPO and regional historical architect recommended that the park avoid the use of wall-mount brackets for the installation of televisions in the guest rooms and continue to have televisions placed on top of the furniture. While use of wall-mounting brackets would be reversible, avoiding this action would reduce the effects to this National Historic Landmark building by limiting penetrations of the historic plastered walls. For the smaller rooms, placing the televisions on the furniture would not meet project objectives to achieve hospitality industry standards for hotel room furnishings. An attempt was made to construct brackets that would raise the televisions above the furniture but required additional wall penetrations to stabilize the furniture made top-heavy by the television and brackets. This also did not meet the industry standards for furnishings.
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D. RECOMMENDED BY PARK SECTION 106 COORDINATOR:

NHPA
Specialist

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

**Madelyn
Ruffner**

Date: 5/14/2020

E. SUPERINTENDENT'S APPROVAL

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

Superintendent:

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

Date:

Cicely Muldoon

5/14/2020