



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: Alan Kunz, Project Manager, Yosemite National Park

From: Cicely Muldoon, Acting Superintendent, Yosemite National Park

Subject: NEPA and NHPA Clearance: 2020-139 AT&T Union Point Repeater Repairs (PEPC: 96634)

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:

- The company charged with implementing the helicopter flights will be responsible for developing and implementing helicopter safety plans.
- This project will occur in the fall, outside of Peregrine Falcon nesting season.
- No night work is authorized.
- No trees will be removed as part of this project. Any future tree removal will require consultation with the park Lands, Vegetation, and Compliance staff.
- AT&T will coordinate the date and time of project implementation with NPS staff to minimize impacts to park operations, concessionaires, and Valley residents.
- Helicopter and field activities will not interfere with other legal activities occurring on NPS managed lands.
- Helicopter Flight- The Park must be notified 3 weeks in advance and also the day before the flight operation. Must contact the Park Aviation Manager (or acting) a week before the flight to assure all potential emergency responding units are aware of the flight operations. Park dispatch must be notified the day of the flight to give an ETA of when the flight will be in park (ECC 209.379.1998). All helicopters used during project work must report identification number, color, and ownership information prior to airflight over park.

- No more than 10 helicopter flights are authorized by the Wilderness Minimum Requirements Analysis that has been prepared for this action.

There are no NHPA Recommendations for Conditions or Stipulations identified.

Acting Superintendent: Cicely Muldoon **Date:** September 15, 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: AT&T Union Point Repeater Repairs

PEPC Project Number: 96634

Description of Action (Project Description):

The passive microwave repeater at Union Point (the Sentinel Reflector), is a reflective panel which assists in closing the microwave link from the signal origin on the rim of Yosemite Valley to the Valley floor. The sheer cliffs of the Valley necessitate the presence of this structure in completing this link and providing crucial telecommunications for Valley operations. The repeater is located in designated Wilderness, directly north and downslope of Sentinel Dome.

In early July 2020, the passive repeater at Union Point was found damaged by a suspected decayed tree break. The top left corner of the structure was found bent out of alignment, resulting in a reduction of telecommunications signal across Yosemite Valley. AT&T, the company responsible for maintaining the structure, is requesting the issuance of a Special Use Permit to replace the flat metallic panel of the repeater. The panel would be painted flat black to match the existing damaged panel.

The new panel will take approximately 8-10 weeks to manufacture. Installation will take 1 day. The panel and installation hardware would be brought into the site by helicopter; up to ten total flights are planned. Ground crews will hike into the site. AT&T will coordinate the date and time of repair with NPS leadership, Yosemite Hospitality, and other stakeholders as telephone service will be unavailable while the panel is being replaced. Equipment staging is planned in either Foresta or El Portal.

Mitigation(s):

See Letter of Compliance Completion form for mitigations.

CE Citation: C.3 Routine maintenance and repairs to non-historic structures, facilities, utilities, grounds and trails.

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: Cicely Muldoon **Date:** September 15, 2020
Cicely Muldoon

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

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 130007)?	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: AT&T Union Point Repeater Repairs
PEPC Project Number: 96634
Project Type: Special Use Permit (SUP)
Project Location:
County, State: Mariposa, California
Project Leader: Alan Kunz

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 <i>Vegetation</i>	Potential	Issue: The repeater structure is located in dense forest; some vegetation removal is being considered to minimize future damage to the structure. Impact: Any potential vegetation removal will be assessed at the time of project implementation and will need to be approved as a separate undertaking.
Biological Wildlife and/or Wildlife Habitat including terrestrial and aquatic species	Potential	Issue: Equipment will be flown into the site via helicopter, potentially disturbing wildlife. Impact: Work will occur in the fall, outside of nesting and breeding season.

Resource	Potential for Impact	Potential Issues & Impacts
<i>Disturbance to animals</i>		
Cultural Archeological Resources	None	See assessment of effect form for cultural resources.
Cultural Cultural Landscapes	None	
Cultural Ethnographic Resources	None	
Cultural Museum Collections	None	
Cultural Prehistoric/historic structures	None	
Geological Geologic Features	None	
Geological Geologic Processes	None	
Lightscares Lightscares	None	
Other Human Health and Safety <i>Communication Systems</i>	Potential	<p>Issue: Further damage to the repeater structure would disrupt all phone communication in Yosemite Valley, putting visitors and employees at risk. No phone service will be available for approximately 6 hours while the panel is being repaired.</p> <p>Impact: The contractor will coordinate the timing of the repair with the NPS and its partners to minimize service disruption. Phone signal will be improved once repairs are complete.</p>
Other Operational <i>NPS and Concessioner Communications</i>	Potential	<p>Issue: Further damage to the repeater structure would disrupt all phone communication in Yosemite Valley, disrupting all NPS and YH operations in the Valley. No phone service will be available for approximately 6 hours while the panel is being repaired.</p> <p>Impact: The contractor will coordinate the timing of the repair with the NPS and its partners to minimize service disruption. Phone signal will be improved once repairs are complete.</p>
Other Other	None	
Socioeconomic Land Use	None	

Resource	Potential for Impact	Potential Issues & Impacts
Socioeconomic Minority and low-income populations, size, migration patterns, etc.	None	
Socioeconomic Socioeconomic	None	
Soundscapes Soundscapes <i>Soundscapes</i>	Potential	Issue: The repeater panel allows for phone communications across Yosemite Valley, possibly contributing to increased noise levels in the Valley. Impact: Repairing the panel will return phone service in the Valley to previous levels.
Viewsheds Viewsheds	None	
Visitor Use and Experience Recreation Resources <i>4 Mile Trail</i>	Potential	Issue: The section of the 4 Mile Trail adjacent to the project site may be closed during helicopter flight. Impact: Trail closure will be temporary during project implementation (approximately 6 hours).
Visitor Use and Experience Visitor Use and Experience	Potential	Issue: The repeater panel allows for phone communications across Yosemite Valley, providing a desired service for visitors. Impact: Repairing the panel will return phone service in the Valley to previous levels.
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 <i>Wilderness</i>	Potential	Issue: The facility is located in designated wilderness. Helicopter use in wilderness is restricted unless no other feasible options exist. Impact: A Minimum Requirement Analysis has been prepared for this action. The site predates the wilderness boundary designation and no other locations or technology are logistically or economically feasible as alternates to the site. Using a helicopter to

Resource	Potential for Impact	Potential Issues & Impacts
		transport repair materials is the only feasible option given the size of the panel and the remote location of the site.



ASSESSMENT OF ACTIONS HAVING AN EFFECT ON HISTORIC PROPERTIES

A. DESCRIPTION OF UNDERTAKING

1. **Park:** Yosemite National Park

2. **Project Description:**

Project Name: AT&T Union Point Repeater Repairs

Prepared by: Daniel Sharon **Date Prepared:** 07/15/2020 **Telephone:** (209) 379-1038

PEPC Project Number: 96634

Locations:

County, State: Mariposa, CA

Describe project:

See Categorical Exclusion Form.

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

The APE is limited to the Union Point passive repeater facility as well as planned equipment staging areas in the El Portal "Sand Pit" or Foresta. No ground disturbance is planned as part of this project. The project is expected to take 1 day to complete.

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

☒ **No**

☐ **Yes**

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

Archeological Resources Present: No

Historical Structures/Resources Present: No

Cultural Landscapes Present: No

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

☐ **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
No 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: 08/17/2020

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: Park Specific or Other Programmatic Agreement

[X] Anthropologist

Name: Liz Williams

Date: 08/17/2020

Comments: no ground disturbance expected

Check if project does not involve ground disturbance []

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: Park Specific or Other Programmatic Agreement

[X] Archeologist

Name: Wesley Wills

Date: 08/17/2020

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: Park Specific or Other Programmatic Agreement

☒ **Historian**

Name: Scott Carpenter

Date: 08/17/2020

Comments: Project involves in-kind replacement of reflector panels on existing frame, no ground disturbance. No historic structures, no historic landscapes. 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:

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

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.)

☒ **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:

- No NHPA mitigations identified.

6. Assessment of Effect Notes:

Project is covered under the 2020 Yosemite Programmatic Agreement, category 8e: Replacement of above-ground infrastructure provided the undertaking is not located in a historic property or visible from an above-ground historic property.

D. RECOMMENDED BY PARK SECTION 106 COORDINATOR:

NHPA Specialist

Madelyn Ruffner Madelyn Ruffner

Date: September 8, 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.

Acting Superintendent: Cicely Muldoon **Date:** September 15, 2020
Cicely Muldoon

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



Other Compliance/Consultations Form

Park Name: Yosemite National Park
PEPC Project Number: 96634
Project Title: AT&T Union Point Repeater Repairs
Project Type: Special Use Permit
Project Location:
County, State: Mariposa, CA
Project Leader: Alan Kunz

ESA

Any Federal Species in the project Area? No
If species in area: No Effect
Was Biological Assessment prepared?
If Biological Assessment prepared, concurred?
Formal Consultation required? No
Formal Consultation Notes:

Formal Consultation Concluded:
Any State listed Species in the Project Area? No
Consultation Information:
General Notes:

Data Entered By: Rachel Mazur

Date: Aug 19, 2020

ESA Mitigations

No ESA mitigations are associated with this project.

Floodplains/Wetlands/§404 Permits

Question	Yes	No	Details
A.1. Is project in 100- or 500-year floodplain or flash flood hazard area?			
A.2. Is Project in wetlands as defined by NPS/DOI?			
B. COE Section 404 permit needed?			Request Date: Issue Date: Expiration Date:
C. State 401 certification?			

D. State Section 401 Permit?			Issue Date: Expiration Date:
E. Tribal Water Quality Permit?			
F. CZM Consistency determination needed?			Date Review Requested: Date Reply Received: Date State Concurred:
G. Erosion & Sediment Control Plan Required?			
H. Any other permits required?			Permit Information:
Other Information:			

Data Entered By: _____ Date: _____

Floodplains & Wetlands Mitigations

No Floodplains & Wetlands mitigations are associated with this project.

Wilderness

Question	Yes	No	
A. Does this project occur in or adjacent to Designated, Recommended, Proposed, Study, Eligible, or Potential Wilderness?	Yes		
B. Is the only place to conduct this project in wilderness?	Yes		
C. Is the project necessary for the administration of the area as wilderness?		No	
D. Would the project or any of its alternatives adversely affect (directly or indirectly) Designated, Recommended, Proposed, Study, Eligible, or Potential Wilderness? (If Yes, Minimum Requirements Analysis required)	Yes		
E. Does the project or any of its alternatives involve the use of any of the Wilderness Act Section 4(c) prohibited uses: commercial enterprise, permanent road, temporary road, motor vehicles, motorized equipment, motorboats, landing of aircraft, mechanical transport, structure, or installation? (If Yes, Minimum Requirements Analysis required)	Yes		
If the answer to D or E above is "Yes" then a Minimum Requirements Analysis is required. Describe the status of this analysis in the column to the right.			Initiation Date: Jul 13, 2020 Completed Date: Aug 25, 2020 Approved Date: Aug 26, 2020
Other Information:			

Data Entered By: Daniel Sharon **Date:** Sep 2, 2020

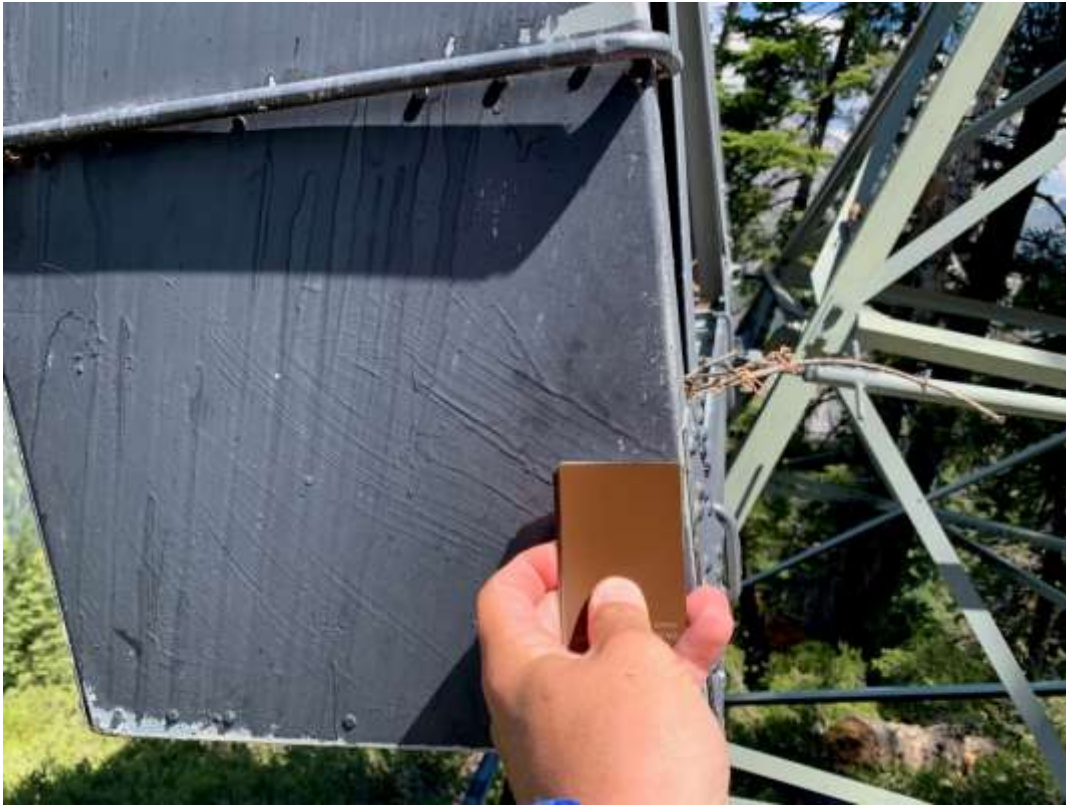
Other Permits/Laws *Questions A & B are no longer used.*

Question	Yes	No
C. Wild and scenic river concerns exist?		No
D. National Trails concerns exist?		No
E. Air Quality consult with State needed?		No
F. Consistent with Architectural Barriers, Rehabilitation, and Americans with Disabilities Acts or not Applicable? (If N/A check Yes)		No
G. Other:		

Other Information:

Data Entered By: Daniel Sharon **Date:** Sep 2, 2020

Pictures



Picture 1: Existing panel color



Picture 2: Existing panel



Picture 3: View of panel from above



Picture 4: View of panel from below



Picture 5: Union Point passive repeater