

Letter of Compliance Completion

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.

Yosemite National Park

Date: 10/08/2020

To: Rick Hall, Project Manager, Yosemite National Park

From: Cicely Muldoon, Acting Superintendent, Yosemite National Park

Subject: NEPA and NHPA Clearance: 2020-064 Replace Wooden Pole 59 with Metal Lattice Pole near Cascades Substation (PEPC: 94727)

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.
- 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:

- Compliance with food-storage and garbage disposal requirements must be achieved at all times.
- Work within streams shall be scheduled during drier months.
- Measures shall be taken to prevent the introduction of exotic species in the project area and staging areas. All earth moving equipment must enter the Park free of dirt, dust, mud, seeds, or other potential contaminant. Examples of equipment that require inspection are excavators, skid steers, or boring equipment. Passenger vehicles do not need inspection but should be clean prior to entry in the park. Equipment exhibiting any dirt or other material attached to frame, tires, wheels, or other parts shall be thoroughly cleaned by the Contractor before entering the Park. Areas inspected shall 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. The Contractor shall notify the Construction manager at least two work days (not including weekends) prior to bringing any equipment into the Park. Equipment found to have entered the Park with potential

- contaminants will be removed from the Park at the direction of the Contracting Officer at Contractor's sole expense.
- The raptor nesting season is March to July. Ensure project activities are completed by March 1 or begin after July 31. Project activities are not authorized from March 1st to July 31st. If work must occur within this avoidance window, contact the park Terrestrial Ecologist (209-379-1435) for approval and coordination of protections, surveys, and/or monitoring (as deemed appropriate at the discretion if the Terrestrial Ecologist) at least 6 weeks ahead of the projected start date.
- Health and Safety Plan (HASP) and Accident Prevention Plan (APP) are required: email these plans to myron_grissom@nps.gov prior to project implementation and mobilization.

There are no NHPA Recommendations for Conditions or Stipulations identified.

The signed original of this document is on file at the

	ning and Compliance Office in the National Park.			
Acting Superintendent:	Cicely Muldoon	Date:	11/1/2020	
	Cicely Muldoo	 on		

Categorical Exclusion Documentation Form (CE Form)

Project: Replace Wooden Pole 59 with Metal Lattice Pole near Cascades Substation

PEPC Project Number: 94727

Description of Action (Project Description):

The proposed action is to replace an existing wooden utility pole (#59) that poses structural and safety issues. Pole 59 has been previously replaced but, continues to be structurally inadequate. Various options were examined as alternatives to replacement. These options included rerouting of the line, removal of the pole with no replacement, and measures to strengthen the existing pole. None of these alternatives were structurally acceptable.

Yosemite National Park

Date: 10/08/2020

The project area is on a boulder bar within the Merced River corridor near the Cascades electrical substation along El Portal Road (CA highway 140). It is above the Ordinary High-Water Mark (OHWM). The new structure will be placed approximately 30 to 50-feet to the east of the existing wooden pole location. The existing pole is 70.7feet. The new lattice structure will be approximately 105-feet high. The overall alignment of the overhead transmission line will remain largely unchanged. The new lattice tower will require the installation of 4 micropiles (each 6-inch diameter) and 2 grounding rods (5/8-inch grounding rods set 6 feet apart, extending 8 feet in deep). Micropiles will be drilled using helicopter assistance for the placement of a temporary drilling platform (approximately 12 by 15 feet in size) on top of the ground. Each micropile will be set into bedrock (the exact depth of penetration will be determined in the field, but engineers anticipate that bedrock is shallow at the proposed project sites). Penetration of the subsoil for the micropile installation is not expected to exceed 15-feet as engineers anticipate that bedrock is located at 3-4 feet in this area. The existing pole would be removed using helicopter assistance. Removal of the existing pole will require minimal digging. Equipment and materials staging for this work will be temporary. It is anticipated to occur in multiple locations. The large existing staging area along the east bank of the Merced River between the Rancheria Flat housing complex and the El Portal wastewater treatment plant may be used as will an empty lot associated with the privately-owned lodge immediately west of the park. Improvements to the staging areas are not anticipated. Potential landing areas will be on existing paved areas and include the Crane Flat Helibase and a private parking area just west of the park entrance on Highway 140. These areas will be used to stage the helicopter and tower components, drill equipment, and conductors. Some traffic delays may occur during helicopter operations. Short term traffic control for safety will be in place sporadically as needed.

Mitigation(s): See Letter of Compliance Completion Form for mitigations.

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

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:	11/1/2020
Superintendent:			
	Cicely Muldoon		

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Extraordinary Circumstances:

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	No	
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?		
C. Have highly controversial environmental effects or involve unresolved conflicts	No	
concerning alternative uses of available resources (NEPA section 102(2)(E))?		
D. Have highly uncertain and potentially significant environmental effects or involve	No	
unique or unknown environmental risks?		
E. Establish a precedent for future action or represent a decision in principle about	No	
future actions with potentially significant environmental effects?		
F. Have a direct relationship to other actions with individually insignificant, but		No longer applicable
cumulatively significant, environmental effects?		per the updated 2020
		CEQ NEPA regulations
		and DOI direction
G. Have significant impacts on properties listed or eligible for listing on the	No	
National Register of Historic Places, as determined by either the bureau or office?		
H. Have significant impacts on species listed or proposed to be listed on the List of	No	
Endangered or Threatened Species, or have significant impacts on designated		
Critical Habitat for these species?		
I. Violate a federal, state, local or tribal law or requirement imposed for the	No	
protection of the environment?		
J. Have a disproportionately high and adverse effect on low	No	
income or minority populations (EO 12898)?)?		
K. Limit access to and ceremonial use of Indian sacred sites on federal lands by	No	
Indian religious practitioners or adversely affect the physical integrity of such sacred		
sites (EO 130007)?		
L. Contribute to the introduction, continued existence, or spread of noxious weeds or	No	
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)?		

ENVIRONMENTAL SCREENING FORM (ESF)

Updated Sept 2015 per NPS NEPA Handbook

A. PROJECT INFORMATION

Project Title: Replace Wooden Pole 59 with Metal Lattice Pole near Cascades Substation

Yosemite National Park

Date: 10/08/2020

PEPC Project Number: 94727

Project Type: Repair/Rehabilitation (REHAB)

Project Location:

County, State: Mariposa, California

Project Leader: Rick Hall

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 Non-native and Exotic Species	Potential	Issue: Earth moving, drilling and excavation equipment has the potential to introduce non-native plants to the park. Impact: Follow resource protection measures to prevent invasive plant introductions.
Biological Species of Special Concern or Their Habitat		
Biological Vegetation		
Biological Wildlife and/or Wildlife Habitat including terrestrial and aquatic species Species of Special	Potential	Issue: Special status raptors have the potential to be disturbed by helicopter flights. Impact: The raptor nesting season is March to July. Ensure project activities are completed by March 1 or begin after July 31. Project activities are not authorized from March 1st to July 31st. If work must occur within this avoidance window, contact the park Terrestrial Ecologist (209-379-1435) for approval and coordination

Concern or Their Habitat		of protections, surveys, and/or monitoring (as deemed appropriate at the discretion if the Terrestrial Ecologist) at least 6 weeks ahead of the projected start date.
Cultural Archeological Resources Merced River	None	Issue: The power pole area in the center of the river was archeologically surveyed in 1997, and the staging area in El Portal was most recently surveyed in 2019, with no sites identified at either location. No additional archeological work is planned for this undertaking. Impact: none
Cultural Cultural Landscapes The Exchequer- Yosemite 70kV line	None	The Exchequer-Yosemite 70kV line was determined not eligible for listing in the NRHP by the Forest Service. The SHPO concurred with the Forest Service's findings per letter dated 30 June 2017.
Cultural Ethnographic Resources	None	
Cultural Museum Collections	None	
Cultural Prehistoric/historic structures	None	
Geological Geologic Features	None	
Geological Geologic Processes	None	
Lightscapes	None	
Other Human Health and Safety	None	
Other Operational	None	
Other	None	
Socioeconomic Land Use	None	
Socioeconomic Minority and low- income populations, size, migration patterns, etc.	None	
Socioeconomic	None	

Soundscapes	None	
Viewsheds Viewshed Along Merced River	Potential	Issue: New metal utility lattice structure may be visible from El Portal road. Impact: The replacement structure will be placed approximately 50 feet to the east of the existing pole. This will maximize the use of existing vegetation to shield it from view.
Visitor Use and Experience Recreation Resources	None	
Visitor Use and Experience Visitor Use and Experience Potential traffic delays	Potential	Issue: Some traffic delays may occur during helicopter operations. Impact: Short term traffic control for safety will be in place sporadically as needed.
Water Floodplains Flooding threat to property or humans	Potential	Issue: Potential loss of property or human life from flooding. Impact: A Floodplain Significance of Finding was drafted and determined that the proposed project would not impact the floodplain or pose a threat to property or human life in a flood event.
Water Marine or Estuarine Resources	None	
Water Water Quality or Quantity	None	
Water Wetlands	None	
Water Wild and Scenic River Merced Wild and Scenic River	Potential	Issue: The proposed project is located on a boulder bar within the Merced River. In accordance with the Wild and Scenic River Act a Section 7 analysis and determination was completed for the project. Impact: Although within the bed and banks and designated corridor of the Merced Wild and Scenic River the proposed project will not intrude on or unreasonably diminish the scenic, geologic process, recreational, biological, cultural, or hydrologic process values present in the area on the date the Merced River was designated a component of the Wild and Scenic Rivers System.
Wilderness	None	

ASSESSMENT OF ACTIONS HAVING AN EFFECT ON HISTORIC **PROPERTIES**

Yosemite National Park

Date: 10/08/2020

A. DESCRIPTION OF UNDERTAKING

1. Park: Yosemite National Park

2. Project Description: See Categorical Exclusion form.

Project Name: Replace Wooden Pole 59 with Metal Lattice Pole near Cascades Substation Prepared by: Laura Stevens **Date Prepared:** 04/28/2020 Telephone: (209) 379-1303

PEPC Project Number: 94727

Locations:

County, State: Mariposa, CA

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

The project proposes to replace pole 59 located on an island in the Merced River. The tower is visible from the existing substation area. It is partially shielded from view along CA highway 140. The vertical subsurface APE depth is up to 15 feet for the drilling platform. The vertical APE is approximately 105 feet above the river bed. The existing pole is approximately 70.7 feet. Staging will occur at areas currently used for park projects (e.g., east bank of the Merced River between the Rancheria Flat housing complex and the El Portal Waste Water Treatment Plant, empty lot associated with the privately owned lodge immediately west of the park.)

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

	No
Х	Yes
	Source or reference:

4. Potentially Affected Resource(s):

Archeological Resources Present: No

Historical Structures/Resources Present: Yes

Property Name: Yosemite Hydroelectric Power Plant LCS:

Cultural Landscapes Present: No

Property Name: Merced Canyon Travel Corridor LCS:

Cultural Landscapes Notes: The Exchequer-Yosemite 70kV line was determined not eligible for listing in the NRHP by the Forest Service and concurred on by the SHPO per letter dated 30 June 2017.

Ethnographic Resources Present: Yes

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
Yes	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: 04/28/2020
Check if project does not involve ground disturbance [] Assessment of Effect:No Potential to Cause EffectNo Historic Properties AffectedX_No Adverse EffectAdverse EffectX_Streamlined Review Recommendations for conditions or stipulations: The CRM team has signed off on the undertaking with the assumption that it will be placed 50 feet upstream of the existing pole. If this location ends up not working, the project manager needs to revisit the location and potential visual impacts with the CRM team.
Doc Method: Streamlined Review (PA) Streamlined Activity: 9. Maintenance or Replacement of Non-Historic Utility Lines, Transmission Lines, and Fences
[X] Anthropologist Name: Liz Williams Date: 04/28/2020
Check if project does not involve ground disturbance [] Assessment of Effect:No Potential to Cause EffectNo Historic Properties AffectedX_No Adverse EffectAdverse EffectX_Streamlined Review Recommendations for conditions or stipulations:

Streamlin	od: Streamlined Review (PA) ed Activity: enance or Replacement of Non-Historic Utility Lines, Transmission Lines, and Fences
[X] Arch Name: Wo Date: 03/2	esley Wills
Comment the stagin	s: The power pole area in the center of the river was archeologically surveyed in 1997, and a garea in El Portal was most recently surveyed in 2019, with no sites identified at either No additional archeological work is planned for this undertaking.
Assessment Adverse I	roject does not involve ground disturbance [] nt of Effect:No Potential to Cause EffectNo Historic Properties AffectedX_No EffectAdverse Effect _X_Streamlined Review ndations for conditions or stipulations:
Streamlin	od: Streamlined Review (PA) ed Activity: enance or Replacement of Non-Historic Utility Lines, Transmission Lines, and Fences
Date: 04/2 Comment Architect	ott Carpenter
Assessment Adverse I	roject does not involve ground disturbance [] Int of Effect:No Potential to Cause EffectNo Historic Properties AffectedX_No EffectAdverse EffectX_Streamlined Review Indations for conditions or stipulations:
Streamlin	od: Streamlined Review (PA) ed Activity: enance or Replacement of Non-Historic Utility Lines, Transmission Lines, and Fences
No Reviev	vs From: Curator, Historical Architect, Other Advisor, Historical Landscape Architect
	SECTION 106 COORDINATOR'S REVIEW AND RECOMMENDATIONS
1. Assessn	nent of Effect:
	No Potential to Cause Effects
	No Historic Properties Affected
X	No Adverse Effect Adverse Effect
<u></u>	/ Advoice Elliot

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.)
[X] 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: 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.)
6. Assessment of Effect Notes:

D. RECOMMENDED BY PARK SECTION 106 COORDINATOR:

NHPA Specialist Hope Schear 10/13/2020

Hope Schear 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 Teresa Austin for Cicely Muldoon Date: 11/1/2020

Superintendent: Cicely Muldoon

8.e. Replacement of above-ground infrastructure provided the undertaking is not located in a historic

property or visible from an above-ground historic property.

YOSEMITE NATIONAL PARK SECTION 7 ANALYSIS AND DETERMINATION

MERCED WILD AND SCENIC RIVER

REPLACE WOODEN POLE 59 WITH METAL LATTICE STRUCTURE NEAR CASCADES SUBSTATION, Merced River, CA

The Merced River in Yosemite National Park is a component of the National Wild and Scenic Rivers System. Projects that involve construction in the bed or on the banks of the Merced River are water resources projects that require review under Section 7 of the Wild and Scenic Rivers Act. The replacement of an existing wooden utility pole (#59) with a metal lattice structure is within the bed and banks of Segment 3: the Merced Gorge of the Merced Wild and Scenic River; therefore, actions to replace the existing utility pole cannot intrude upon or unreasonably diminish the scenic, recreational, and fish and wildlife values present in the area on the date the Merced River was designated as a component of the Wild and Scenic Rivers System.

1. Project Information:

Title: Replace Wooden Pole 59 With Metal Lattice Structure

Planning & Compliance Number: 94727

Location: Merced River near the Cascades electrical substation

Project Proponent: Facilities Maintenance, Rick Hall

<u>Project Description</u>: The proposed action is to replace an existing wooden utility pole (#59) that poses structural and safety issues. Pole 59 has been previously replaced but, continues to be structurally inadequate. Various options were examined as alternatives to replacement. These options included rerouting of the line, removal of the pole with no replacement, and measures to strengthen the existing pole. None of these alternatives were structurally acceptable. The project area is on a boulder bar within the Merced River corridor near the Cascades electrical substation along El Portal Road (CA highway 140). It is above the Ordinary High-Water Mark (OHWM). The new structure will be placed approximately 30 to 50-feet to the east of the existing wooden pole location. The existing pole is 70.7feet. The new lattice structure will be approximately 105-feet high. The overall alignment of the overhead transmission line will remain largely unchanged. The new lattice tower will require the installation of 4 micropiles (each 6-inch diameter) and 2 grounding rods (5/8-inch grounding rods set 6 feet apart, extending 8 feet in deep). Micropiles will be drilled using helicopter assistance for the placement of a temporary drilling platform (approximately 12 by 15 feet in size) on top of the ground. Each micropile will be set into bedrock (the exact depth of penetration will be determined in the field, but engineers anticipate that bedrock is shallow at the proposed project sites). Penetration of the subsoil for the micropile installation is not expected to exceed 15-feet as engineers anticipate that bedrock is located at 3-4 feet in this area. The existing pole would be removed using helicopter assistance. Removal of the existing pole will require minimal digging.

Equipment and materials staging for this work will be temporary. It is anticipated to occur in multiple locations. The large existing staging area along the east bank of the Merced River between the Rancheria Flat housing complex and the El Portal wastewater treatment plant may be used as will an empty lot associated with the privately-owned lodge immediately west of the park. Improvements to the staging areas are not anticipated. Potential landing areas will be on existing paved areas and include the Crane Flat Helibase and a private parking area just west of the park entrance on Highway 140. These areas will be used to stage the helicopter and tower components, drill equipment, and conductors.

2. Analysis of Potential Impacts

Table 1. Project Impacts on the River's Free Flow and Water Quality

Section 7	Short Term Impacts	Long Term Impacts
Considerations		
Free flow characteristics	None; construction work will be primarily accomplished from	None; No change to channel location or form.
•Channel width/depth •Vertical drop •Channel form	helicopter and performed on an island in the river.	
Water Quality •Turbidity •Temperature •Nutrient availability	A slight increase in turbidity may occur in the construction zone for a short (<24 hours) period. No other water quality impacts are anticipated.	None; there are no long- term impacts associated with the utility pole replacement; water quality will not be changed or impacted.

Table 2. Project Impacts on the Outstandingly Remarkable Values for which the River was Designated Wild and Scenic

River	Project
ORVs	Impacts
Scenic: The scale, grandeur, and extraordinary concentration of scenic features in the Merced River watershed inspire emotional connections to the river and surrounding Yosemite National Park	 Temporary intrusions into the scenic views of the river will occur during the pole replacement work. The new lattice steel structure will mainly be shielded from view from the El Portal Road by mature trees along the riverbank. This structure is part of the existing utility line within the Merced River corridor. Scenic ORV features will be restored after work is completed. This section of the Merced River currently serves as a powerline corridor. The new structure will be in-kind with existing utility towers. The location of the new structure has been designed to maximize tree cover and vegetative screening of the tower to minimize its visibility from the road.

3. Section 7 Determination:

Although within the bed and banks and designated corridor of the Merced Wild and Scenic River the proposed project will not intrude on or unreasonably diminish the scenic, geologic process, recreational, biological, cultural, or hydrologic process values present in the area on the date the Merced River was designated a component of the Wild and Scenic Rivers System.

Madelyn Ruffner	10/19/2020
Recommended by Madelyn Ruffner, Compliance Program Manager	date
Cicalty Muldoom	11/1/2020
Cicely Muldoon	11/1/2020

Approved by Cicely Muldoon, Acting Superintendent

date

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