



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: Josh Keyes, Project Manager, Yosemite National Park

From: Cicely Muldoon, Superintendent, Yosemite National Park

Subject: NEPA and NHPA Clearance: 2020-017Ahwahnee Hotel Ground Floor Loss Prevention Camera Installation (79802)

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:

- Cameras and associated conduit will be positioned to not adversely affect historic fabric or detract from historic views within or from building.
- Revised plans showing concealed rather than surface wiring and ceiling mounted rather than wall mounted cameras in public spaces to be reviewed by NPS historical architect prior to installation.
- To the extent practical, work shall be scheduled to avoid construction activity and construction related delays during peak visitation times. No holiday or nighttime work shall be allowed. Weekend work (Friday through Sunday) shall not be allowed unless authorized in writing by the park superintendent.

There are no NHPA Recommendations for Conditions or Stipulations identified.

Superintendent: Cicely Muldoon

Date: 1/14/2021

Cicely Muldoon

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Categorical Exclusion Documentation Form (CE Form)

Project: Ahwahnee Hotel Ground Floor Loss Prevention Camera Installation (YH 2020)

PEPC Project Number: 79802

Description of Action (Project Description):

JUSTIFICATION: This project consists of the installation of loss prevention cameras on the ground floor of the building throughout the kitchen, gift shop, sweet shop, and bar (remodeled in 2016). This is required to meet YH's internal business guidelines and corporate policies.

SCOPE: The cameras are proposed for the following locations:

1. Bar POS (Point of Sale) 2. Bar back area 3. Bar back exit door 4. Sweet Shop POS 5. Gift Shop Left POS 6. Gift Shop Right POS 7. Safe 8. Cash Count Counter 9. Kitchen POS 10. Employee exit door 11. Kitchen exit Door 1 12. Kitchen exit Door 2 13. Kitchen exit Door 3

Kitchen: The proposed exposed wiring would be located in the main kitchen area along the ceiling, behind the column separating the main kitchen space from the dish pit area. Wiring will not be visible to hotel guests. The wiring will be minimized to create the shortest run with the lowest visual impact. Wiring will only be run to the full ceiling level for the camera above the kitchen cash stand. In the kitchen, the cameras will be mounted to the walls, with the exception of the camera over the food checker stand which will be mounted on the ceiling. The door trim in the kitchen area will not be damaged during this project.

Other camera locations: The wiring will be run through the small sub-space above the ceiling. Single drill points will be made to feed the wire into the space. All wires, once in the space, will be pulled into the server room behind the front desk, along existing path of travel. (No wiring will be visible to guests). The wiring will not be visible in the main part of the building as it will be hidden in the crawl space above the ceiling. In the main part of the building the cameras will be mounted on the ceiling.

Exposed wiring in the kitchen will be painted to match the color of the walls.

Proposed work includes the installation of thirteen cameras (enclosure 1: building plan with proposed locations for cameras). The cameras installed in the interior of the building will be dome-shaped, ceiling-mounted cameras each measuring a maximum of 4" (diameter) x 2.2" (height); the three (3) exterior cameras will be 5.19" x 10.25." The camera locations are critical to monitoring all activities in the cash register areas and sensitive exits in the first floor of the building. The number of cameras has been minimized to the greatest extent possible while still meeting security needs. Cameras, camera housings, and all wire will be painted to match the background surface.

The Ahwahnee Historic Structure Report states that alterations to "Contributing" spaces "should be minimized to reduce their effect on historic spatial relationships and materials." The addition of security cameras and alarm systems (including wiring) in these areas would not result in the loss of historic materials nor would it affect the historic spatial relationships of these spaces. The installation of cameras would not change the functions or use of these areas.

The addition of the security equipment, although contemporary in nature, is consistent with commercial operation of the kitchen, bar, and loading docks by a concessioner. Effects to the historic fabric and character of the building would be minimized by using existing holes in ceiling and walls. Finally, the overall number of cameras has been

minimized while still meeting the objectives of building security. Although the additions would be contemporary in nature, they would not adversely affect the eligibility of the building as a National Register of Historic Places listed property.

Mitigation(s):

See Letter of Compliance Completion Form for mitigations

CE Citation: C.5 Installation of signs, displays, kiosks, etc.

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.

Superintendent: Cicely Muldoon

Date: 1/14/2021

Cicely Muldoon

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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 longer applicable per the updated 2020 CEQ NEPA regulations and DOI direction
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: Ahwahnee Hotel Ground Floor Loss Prevention Camera Installation (YH 2020)
PEPC Project Number: 79802
Project Type: Capital Improvement/New Construction (CI)
Project Location:
County, State: Mariposa, California
Project Leader: Josh Keyes

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	

Cultural Cultural Landscapes	None	
Cultural Ethnographic Resources	None	
Cultural Museum Collections	None	
Cultural Prehistoric/historic structures	Potential	Issue: Cameras and associated conduit will be positioned to not adversely affect historic fabric or detract from historic views within or from building. Revised plans showing concealed rather than surface wiring and ceiling mounted rather than wall mounted cameras in public spaces to be reviewed by NPS historical architect prior to installation. The proposal for exterior cameras was removed and all cameras in this project will be inside the building to minimize effects to the historic resource.
Geological Geologic Features	None	
Geological Geologic Processes	None	
Lightscares Lightscares	None	
Other Human Health and Safety	None	
Other Operational	Potential	Issue: Work will be scheduled during seasons of lower visitation and will not conflict with other scheduled construction.
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	None	

Recreation Resources		
Visitor Use and Experience Visitor Use and Experience	Potential	Issue: Front-of-house work will be scheduled during seasons of lower visitation to minimize impacts to public areas and visitor access to these areas.
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: Ahwahnee Hotel Ground Floor Loss Prevention Camera Installation (YH 2020)

Prepared by: Erin Davenport **Date Prepared:** 6/4/2018 **Telephone:** (209) 379-1067

PEPC Project Number: 79802

Locations:

County, State: Mariposa, CA

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 includes back-of-house areas as well as the Bar, Gift Shop and Sweet Shop within the Ahwahnee Hotel Main Building. This area is bounded by the interior walls of the ground floor. All work would be completed in contributing spaces within the hotel. There would be no excavation associated with the project so there is no vertical or sub-surface APE.

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

No

X Yes

Source or reference:

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

Archeological Resources Present: No

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

Archeological Resources Notes: Archeological resources are present in the vicinity of the Ahwahnee Hotel but would not be affected by the project because work will be within the interior of the building and there is no ground disturbance.

Historical Structures/Resources Present: Yes

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

Property Name: Ahwahnee Hotel National Historical Landmark **LCS:**

Property Name: Ahwahnee Hotel **LCS:**

Cultural Landscapes Present: No

Cultural Landscapes Notes: Work is internal to the building so no cultural landscapes would be affected.

Ethnographic Resources Present: No

Ethnographic Resources Notes: Work is internal to the building so no cultural landscapes would be affected.

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

- | Yes/No | List of potential effects |
|--------|---|
| Yes | Destroy, remove, or alter features/elements from a historic structure |
| No | 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) |
| X | Other (please specify): - The addition of security cameras (including wiring) in these areas would not result in the loss of historic materials nor would it affect the historic spatial relationships of these spaces. The installation of cameras would not change the functions or use of these areas.

The presence of the cameras is consistent with concessioner managed food and back-of-house operations. The addition of the security equipment, although contemporary in nature, is consistent commercial operation of the kitchen and loading docks by a concessioner. The visual impact of the equipment would be minimized as would affects to the historic fabric and character of the building. Although the additions would be contemporary in nature, they would not affect the eligibility of the building as a National Register of Historic Places listed property. |

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: Hope Schear

Date: 10/21/2020

Comments: Compliance complete. No ground disturbance and no staging will take place on the exterior of the

historic structure that could impact archaeological or cultural landscapes, therefore tribal consultation was not completed for this undertaking.

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: Please see Historical Architect's stipulations.

Doc Method: Standard 4-Step Process

[X] **Anthropologist**

Name: Scott Carpenter

Date: 06/04/2018

Comments: All work occurs to historic building, not to area beyond building.

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: Standard 4-Step Process

[X] **Archeologist**

Name: Scott Carpenter

Date: 06/04/2018

Comments: All work will occur within structure of building. No archeological properties affected.

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: Standard 4-Step Process

[X] **Historian**

Name: Scott Carpenter

Date: 06/04/2018

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: Cameras will be positioned to not adversely affect historic fabric or detract from historic views within or from building.

Doc Method: Standard 4-Step Process

[X] **Historian**

Name: Elaine Jackson-Retondo

Date: 10/06/2020

Comments: See historical architect comments.

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

[X] **Historical Architect**

Name: Sueann Brown

Date: 09/24/2020

Comments: If the project is implemented as described in the narrative it will have minimal impacts in the public spaces. Unfortunately the attached plans show greater visual impacts due to surface mounted wiring. Revised plans matching the narrative should be uploaded.

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: Revised plans showing concealed rather than surface wiring and ceiling mounted rather than wall mounted cameras in public spaces to be reviewed by NPS historical architect prior to installation.

[X] **Historical Landscape Architect**

Name: Kimball Koch

Date: 06/04/2018

Comments: Work is internal to the building and would not affect the cultural landscape associated with the hotel.

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, Other Advisor

C. PARK SECTION 106 COORDINATOR'S REVIEW AND RECOMMENDATIONS

1. Assessment of Effect:

Check if applicable	List of effects
	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: November 12, 2020
SHPO Received: December 14, 2020

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.)

6. Assessment of Effect Notes:

D. RECOMMENDED BY PARK SECTION 106 COORDINATOR:

NHPA Specialist Hope Schear **Date:** 12/30/2020
Hope Schear _____

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: Cicely Muldoon

Date: 1/14/2021

Cicely Muldoon

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