



## 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.

**To:** Kelly White, Project Manager, Yosemite National Park

**From:** Cicely Muldoon, Superintendent, Yosemite National Park

**Subject:** NEPA and NHPA Clearance: 2020-062 Replace Asbestos-Cement Roofing on the Historic Maintenance Shop (Fort Building 527) (PEPC: 91228)

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 National Environmental Policy Act (NEPA) and National Historic Preservation Act (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:

- Changes to approved project plans require review and approval by the Yosemite Environmental Planning and Compliance Office. Only project plans in the Planning, Environment, and Public Comment system (PEPC) 91228 are approved for implementation. No ground disturbance is authorized for this project. All staging shall occur on existing paved parking lots.
- The project manager will install exclusion devices during the summer/early fall season ahead of construction commencing to prevent bats entering the building attic. Consult with the Wildlife Compliance Biologist, Heather Mackey to install bat exclusion devices.
- Contractors and park employees will obey speed limits while traveling in the park. Contractors and park employees will store food and trash in accordance with park regulations.

- The project manager shall remain in close coordination with the Yosemite Environmental Planning and Compliance Office as the project is implemented, giving special attention to ensure that any discoveries regarding the building's original construction are properly documented. Any changes to the project shall be approved by the Environmental Planning and Compliance Office.

**Superintendent:** Cicely Muldoon **Date:** January 13, 2021  
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:** Replace Asbestos-Cement Roofing on the Historic Maintenance Shop (Fort Building 527)

**PEPC Project Number:** 91228

**Description of Action (Project Description):**

This project will remove and abate asbestos-cement roof shingles and asbestos containing tar paper installed in 1935 from the Yosemite Valley Maintenance Building ("The Fort"), Building 527.

Fort Yosemite is located within the Yosemite Village Maintenance Area in Yosemite Valley. The project would remove the existing, highly degraded asbestos-cement (Transite) roof shingles and replace them with visually in-kind metal shingle roofing. Many of the existing roof shingles are cracked, missing in some areas, blowing off in the wind, and falling to the ground, where asbestos particles are broadcast into the air. The remaining shingles are very brittle and the roof sloughs more pieces to the ground whenever maintenance staff walks on the roof for repairs. The Transite shingles, tar paper, and mastic were installed in 1935. They were tested in Oct 2019 by Leon Environmental Services and determined to be asbestos-containing material of 15%, 30%, and 10%, respectively. According to EPA and CAL-OSHA regulations, materials containing greater than 1.0% asbestos by weight are considered asbestos containing material, requiring any renovation, demolition, and disposal of this material to be performed by trained, licensed asbestos abatement contractors. Falling and deteriorating asbestos shingles present a health hazard by releasing asbestos fibers into the air. Because it is so hard to destroy asbestos fibers, the body cannot break them down or remove them once they are lodged in lung or body tissues. They remain in place where they can cause diseases such as asbestosis, lung cancer, and mesothelioma. Many park staff use this building, as it houses the Buildings and Grounds, Custodial, Roads, and Utilities crews for Yosemite Valley, as well as the Fire Station, Law Enforcement, and Jail. There have been a number of Freedom of Information Act requests from building occupants regarding the safety of working in and around this building. The park proposes to contract with a hazardous materials contractor to remove the shingles, tar paper, and flashing (with asbestos containing mastic).

The existing 3x8 sheathing will be replaced in kind where rotted or water damaged. The park would then install 15/32" structural plywood sheathing over the existing 3x8 sheathing, over which ½" fire rated Dens-Deck Prime gypsum material, and a Grace Ice and Water HT, or equal, self-adhesive weather barrier will be installed. The new roofing will consist of a steel shingle interlocking roof system with a 20 Year Watertight Warranty and a 25 year warranty against structural failure and perforation, in a color and texture that mimics the existing Transite shingles, Centura Steel Shingles, with a special run of wood grain embossing. The metal roofing shingles will be gray in color and have been selected in coordination with park cultural resources staff to best match the appearance of the existing asbestos shingles (attachment 5: specs, example). The new roof membrane will provide a leak-free, asbestos-free, Class A fire rated metal roof to protect the building from further decay.

**Project Locations:**

<b>County:</b>	Mariposa	<b>State:</b>	CA
<b>District:</b>	Yosemite Valley	<b>Section:</b>	Bldg 527

**Mitigation(s):**

- Changes to approved project plans require review and approval by the Yosemite Compliance Office. Only project plans in PEPC 91228 are approved for implementation. No ground disturbance is authorized for this project. All staging shall occur on existing paved parking lots.
- The project manager will install exclusion devices during the summer/early fall season ahead of construction commencing to prevent bats entering the building attic. Consult with the Wildlife Compliance Biologist, Heather Mackey to install bat exclusion devices.
- Contractors and park employees will obey speed limits while traveling in the park. Contractors and park employees will store food and trash in accordance with park regulations.
- The project manager shall remain in close coordination with the Yosemite Environmental Planning and Compliance Office as the project is implemented, giving special attention to ensure that any discoveries regarding the building's original construction are properly documented. Any changes to the project shall be approved by the Environmental Planning and Compliance Office.

**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:** NA

**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:** January 13, 2021

Cicely Muldoon, Superintendent

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**Extraordinary Circumstances:**

If implemented, would the proposal...	Yes/No	Notes
<b>A.</b> Have significant impacts on public health or safety?	No	Project improves safety by implementing hazardous material abatement (existing roof shingles contain asbestos).
<b>B.</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	Replacing roofing will continue to protect the historic building.
<b>C.</b> Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources (NEPA section 102(2)(E))?	No	
<b>D.</b> Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks?	No	
<b>E.</b> Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects?	No	
<b>F.</b> Have a direct relationship to other actions with individually insignificant, but cumulatively significant, environmental effects?	No	This criterion no longer applicable per the new CEQ regs and DOI direction
<b>G.</b> 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	Replacing roofing will continue to protect the historic building.
<b>H.</b> 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	
<b>I.</b> Violate a federal, state, local or tribal law or requirement imposed for the protection of the environment?	No	
<b>J.</b> Have a disproportionately high and adverse effect on low income or minority populations (EO 12898)?	No	
<b>K.</b> 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	
<b>L.</b> 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

<b>Project Title:</b>	Replace Asbestos-Cement Roofing on the Historic Maintenance Shop (Fort Building 527)
<b>PEPC Project Number:</b>	91228
<b>PMIS Number:</b>	
<b>Project Type:</b>	Repair/Rehabilitation (REHAB)
<b>Project Location:</b>	
<b>County, State:</b>	Mariposa, California <b>District, Section:</b> Yosemite Valley, Bldg 527
<b>Project Leader:</b>	Kelly White

### B. PROJECT DESCRIPTION

See Categorical Exclusion form.

### C. RESOURCE IMPACTS TO CONSIDER:

Resource	Potential for Impact	Potential Issues & Impacts
<b>Air</b> Air Quality <i>Airborne Hazardous Materials</i>	Potential	Issue: Project implements abatement for hazardous materials (asbestos) that can become airborne.  Impact: Project should improve air quality by removing a potentially hazardous chemical that becomes airborne as the material degrades.
<b>Biological</b> Nonnative or Exotic Species	None	
<b>Biological</b> Species of Special Concern or Their Habitat <i>California Red-legged Frog</i>	Potential	Issue: Yosemite Valley is habitat for listed California red-legged frogs.  Impact: Project should have no effect on listed frogs due to project being limited to the building roof and staging being limited to existing paved parking areas.
<b>Biological</b> Vegetation	None	

<b>Biological</b> Wildlife and/or Wildlife Habitat including terrestrial and aquatic species	None	
<b>Cultural</b> Archeological Resources <i>Yosemite Valley Archeological District</i>	Potential	Issue: Project is located within the Yosemite Valley Archeological District and in/near archeological sites.  Impact: Project should have no effect archeological resources due to the project having no ground disturbance and being limited to the building roof, and the staging being limited to existing paved parking areas.
<b>Cultural</b> Cultural Landscapes <i>Yosemite Valley Historic District</i>	Potential	Issue: Project is located within the Yosemite Valley Historic District, a cultural landscape.  Impact: Project should have no effect on cultural landscapes to being limited to the building roof and being associated with protecting the historic building, which is a contributing resource.
<b>Cultural</b> Ethnographic Resources <i>Ethnographic Resources</i>	Potential	Issue: Ethnographic resources are near project location.  Impact: Project should have no effect ethnographic resources due to the project having no ground disturbance and being limited to the building roof, and the staging being limited to existing paved parking areas.
<b>Cultural</b> Museum Collections	None	
<b>Cultural</b> Prehistoric/historic structures <i>Historic building; Yosemite Village Historic District</i>	Potential	Issue: Project is located in a historic building and contributing resource to the Yosemite Village Historic District and Yosemite Valley Historic District.  Impact: Project should have beneficial effect on historic structure and historic districts as it addresses the degrading roof and protects the building from water damage.
<b>Geological</b> Geologic Features	None	
<b>Geological</b> Geologic Processes	None	
<b>Lightscapes</b> Lightscapes	None	
<b>Other</b> Human Health and Safety <i>Hazardous Materials</i>	Potential	Issue: Project implements abatement for hazardous materials (asbestos) that can become airborne.  Impact: Project should improve human health and safety by removing a potentially hazardous chemical that becomes airborne as the material degrades.
<b>Other</b> Operational	None	

<b>Other</b> Other	None	
<b>Socioeconomic</b> Land Use	None	
<b>Socioeconomic</b> Minority and low-income populations, size, migration patterns, etc.	None	
<b>Socioeconomic</b> Socioeconomic	None	
<b>Soundscapes</b> Soundscapes	None	
<b>Viewsheds</b> Viewsheds <i>Visual Impacts - From Aerial View Points</i>	Potential	Issue: The roof is visible from along the Valley Rim.  Impact: The roof shingles replacing the existing roofing are very similar and should have no effect on the view from above.
<b>Visitor Use and Experience</b> Recreation Resources	None	
<b>Visitor Use and Experience</b> Visitor Use and Experience	None	
<b>Water</b> Floodplains	None	
<b>Water</b> Marine or Estuarine Resources	None	
<b>Water</b> Water Quality or Quantity	None	
<b>Water</b> Wetlands	None	
<b>Water</b> Wild and Scenic River	None	
<b>Wilderness</b> 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:** Replace Asbestos-Cement Roofing on the Historic Maintenance Shop (Fort Building 527)

**Prepared by:** Jessica Salesman    **Date Prepared:** 09/01/2020    **Telephone:** 563-873-3491 x 142

**PEPC Project Number:** 91228

**Locations:**

**County, State:** Mariposa, CA    **District, Section:** Yosemite Valley, Bldg 527

**Describe project:** See Categorical Exclusion form.

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

Fort building and viewpoints from the valley rim and other trails (e.g., Yosemite Falls)

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

**Historical Structures/Resources Present:** Yes

**Property Name:** Yosemite Valley Group Utility Building (Fort Yosemite),

1935    **LCS:**    **ParkID:** B73

**Location:** Yosemite Valley Historic District

**Cultural Landscapes Present:** Yes

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

**Ethnographic Resources Present:** No

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

Yes	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>
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:

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**[ X ] 106 Advisor**

**Name:** Hope Schear

**Date:** 12/22/2020

**Comments:** HA has reviewed the project and compliance with SHPO is complete as of 12/22/2020.

*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 see HA comments.

**Doc Method:** Standard 4-Step Process

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**[ X ] Anthropologist**

**Name:** Liz Williams

**Date:** 07/21/2020

**Comments:** No ground disturbance.

*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:**

**Doc Method:** Standard 4-Step Process

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**[ X ] Archeologist**

**Name:** Wesley Wills

**Date:** 02/06/2020

**Comments:** No ground disturbance is associated with this project.

***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

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**[ X ] Historian**

**Name:** Scott Carpenter

**Date:** 07/21/2020

**Comments:** No historic landscape architect review necessary. Metal roof surface components are visually similar in pattern, dimension, and color to original roofing material.

***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

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**[ X ] Historical Architect**

**Name:** Sueann Brown

**Date:** 08/18/2020

**Comments:** Roofing material to be replaced is no longer available so in kind replacement is not possible. The metal roofing selected will be similar in color and texture when viewed from a distance.

***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:**

**Doc Method:** Standard 4-Step Process

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

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**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:

### ☒ 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:** Nov 16, 2020

**SHPO Received:** Dec 22, 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.)

**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:

- Changes to approved project plans require review and approval by the Yosemite Compliance Office. Only project plans in PEPC 91228 are approved for implementation. No ground disturbance is authorized for this project. All staging shall occur on existing paved parking lots.

**6. Assessment of Effect Notes:** none

**D. RECOMMENDED BY PARK SECTION 106 COORDINATOR:**

**Compliance Specialist:**

**106**

**Coordinator:**

Hope Schear      Hope Schear      **Date:** 12/23/2020

**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:** Cicely Muldoon      **Date:** January 13, 2021  
Cicely Muldoon

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Yosemite National Park.*