



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:** Ruth Middlecamp, Project Manager

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

**Subject:** NEPA and NHPA Clearance: 2020-167 Programmatic CE: RV/Trailer Delivery Service CUA  
(PEPC: 98145)

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 effects 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:

- This Programmatic Categorical Exclusion (PCE) is approved only for actions explicitly described in the Planning, Environment, and Public Comment system (PEPC) 98145; any changes to actions or additional proposed actions must undergo review and approval by the Yosemite Environmental Planning & Compliance Office. The Commercial Use Authorization (CUA) holder will follow all terms specified in their CUA permit.
- The Yosemite CUA Manager will review the PCE annually and coordinate with the Yosemite Environmental Planning and Compliance office should any changes or updates to this PCE be required.
- Recreational vehicles must only drive and park in designated areas, especially in campgrounds. Speed limits should be followed at all times to minimize collisions with wildlife and roadkill. Speed reductions are recommended during warm rainy weather (when amphibians disperse) and during dusk and dawn.
- Compliance with food-storage and garbage disposal requirements must be achieved at all times.

- Refer to the Standard Operating Procedures (SOPs) for programmatic categorical exclusions on Sharepoint (also attached here) for comprehensive mitigations and considerations for the proposed work.

**Superintendent:** Cicely Muldoon  
Cicely Muldoon, Superintendent

**Date:** January 13, 2021

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



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## Categorical Exclusion Documentation Form (CE Form)

**Project:** Programmatic CE: RV/Trailer Delivery Service CUA

**PEPC Project Number:** 98145

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

This is a request for a programmatic Categorical Exclusion (CE) to continue to issue Commercial Use Authorizations (CUA) to companies delivering travel trailers and motorhomes to campgrounds in the park for clients with camping reservations. This programmatic CE will cover CUAs issued beginning on January 1, 2021.

The activity is a front country-based activity and does not enter wilderness or authorize off road use. A change to the CUA will add delivery of motorhomes in addition to travel trailers. This is not a high use activity and has only had one business apply in the past. The increase in attempted RV deliveries to park campgrounds has prompted this change. Deliveries are only authorized to be made at campgrounds on the reservation system. The permit holder will remove the trailer from the park by the designated check out time upon expiration or cancellation of the reservation. The client must purchase the campground reservation. Drivers are to meet California Vehicle Code requirements. This Commercial Use Authorization will be issued as an "out-of-park" CUA which requires that the visitor service originate and terminate outside of the boundaries of the park. The CUA holder is not authorized to advertise, solicit business, collect fees, or sell any goods or services within the boundaries of the park area. The CUA will only be issued for a period of 1 calendar year at a time. Companies must apply for a new CUA each new year. The CUA holder is regulated by the terms and conditions of the CUA which is administered and managed by the Yosemite National Park, Commercial Use Authorization Office in conjunction with the Yosemite National Park Protection Division. The CUA holder must obtain additional authorizations for commercial activities not covered under this CUA. The CUA holder is required to obtain any additional permits or license required by law. The CUA holder is required to submit an annual report listing the total number of vehicle deliveries to the park, the total number of clients and the annual gross receipts collected from conducting their business in the park.

Park campgrounds with sites available by reservation are limited to the following:

- Upper Pines (only campground requiring reservations all year)
- Lower Pines
- North Pines
- Wawona (April - October)
- Crane Flat
- Hodgdon (April - October)
- Tuolumne Meadows (50% by reservation)

The Commercial Use Authorization (CUA) is a tool required by the National Park Service to regulate and oversee the commercial use of National Park Service lands not regulated under a Concessions Management contract.

**Project Locations:**

**Location 1**

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**County:** Madera **State:** CA

**Location 2**

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**County:** Mariposa **State:** CA

**Location 3**

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**County:** Mono **State:** CA

**Location 4**

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**County:** Tuolumne **State:** CA

**Mitigation(s):**

- This Programmatic CE is approved only for actions explicitly described in PEPC 98145; any changes to actions or additional proposed actions must undergo review and approval by the Yosemite Environmental Planning & Compliance Office. The CUA holder will follow all terms specified in their CUA permit.
- The Yosemite CUA Manager will review the Programmatic CE (PCE) annually and coordinate with the Yosemite Environmental Planning and Compliance office should any changes or updates to this PCE be required.
- Recreational vehicles must only drive and park in designated areas, especially in campgrounds. Speed limits should be followed at all times to minimize collisions with wildlife and roadkill. Speed reductions are recommended during warm rainy weather (when amphibians disperse) and during dusk and dawn.
- Compliance with food-storage and garbage disposal requirements must be achieved at all times.
- Refer to the SOP's for programmatic categorical exclusions on Sharepoint (also attached here) for comprehensive mitigations and considerations for the proposed work.

**CE Citation:** A.6 Commercial use licenses involving no construction.

**CE Justification:** Compliance would allow the issuance of a Commercial Use Authorization to amend/update the existing Programmatic Categorical Exclusion to allow travel trailer delivery in addition to RV delivery service.

**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	
<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	
<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?		Criterion no longer applicable per the new CEQ regulations 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	While the CUA would allow use on historic properties (such as campgrounds), it would not expand use or alter the type of use.
<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>	Programmatic CE: RV/Trailer Delivery Service CUA
<b>PEPC Project Number:</b>	98145
<b>Project Type:</b>	Commercial Use Authorization (CUA)
<b>Project Location:</b>	
<b>County, State:</b>	Madera, California
<b>County, State:</b>	Mariposa, California
<b>County, State:</b>	Mono, California
<b>County, State:</b>	Tuolumne, California
<b>Project Leader:</b>	Ruth Middlecamp

### B. PROJECT DESCRIPTION

See Categorical Exclusion Form

### C. RESOURCE IMPACTS TO CONSIDER:

Resource	Potential for Impact	Potential Issues & Impacts
<b>Air</b> Air Quality	None	
<b>Biological</b> Nonnative or Exotic Species	None	
<b>Biological</b> Species of Special Concern or Their Habitat <i>Species of Special Concern and Habitat</i>	Potential	Issue: Although multiple species of special concern occur within the park, the CUA would not cause any greater impacts to the species, as it only allows typical types of visitor use that presently occur.  Impact: No effect on species of listed species or species special concern.
<b>Biological</b> Vegetation	None	
<b>Biological</b> Wildlife and/or Wildlife Habitat	None	

including terrestrial and aquatic species		
<b>Cultural</b> Archeological Resources <i>Archeological resources</i>	Potential	Issue: Although multiple archeological resources are located within the park, the CUA would not cause any greater impacts, as it only allows typical types of visitor use that presently occur. Also, the CUA specifies that the trailers and RVs can only be delivered to sites sized to meet their space requirement, so no encroachments outside of the campsite are anticipated.  Impact: No effect on archeological resources.
<b>Cultural</b> Cultural Landscapes <i>Cultural Landscapes</i>	None	Issue: Although some park campgrounds are contributing resources to historic districts, the CUA would not cause any greater impacts, as it only allows typical types of visitor use that presently occur. Also, the CUA specifies that the trailers and RVs can only be delivered to sites sized to meet their space requirement, so no encroachments outside of the campsite are anticipated.  Impact: No effect on cultural landscapes resources.
<b>Cultural</b> Ethnographic Resources	None	
<b>Cultural</b> Museum Collections	None	
<b>Cultural</b> Prehistoric/historic structures <i>Historic Structures</i>	None	Issue: Although some park campgrounds are contributing resources to historic districts or may be eligible for listing in the National Register on their own, the CUA would not cause any greater impacts, as it only allows typical types of visitor use that presently occur. Also, the CUA specifies that the trailers and RVs can only be delivered to sites sized to meet their space requirement, so no encroachments outside of the campsite are anticipated.  Impact: No effect on cultural landscapes resources.
<b>Geological</b> Geologic Features	None	
<b>Geological</b> Geologic Processes	None	
<b>Lightsapes</b> Lightsapes	None	
<b>Other</b> Human Health and Safety	None	
<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>	None	
<b>Soundscapes</b> Soundscapes	Potential	Issue: RVs and trailers often cause noise due to generator operation.  Impact: CUA should cause no effect to soundscapes because delivered RVs and trailers would only occur in campgrounds and campsites presently allowing for RVs and trailers. No additional capacity for RV or trailer camping would be initiated.
<b>Viewsheds</b> Viewsheds	Potential	Issue: RVs and trailers may pose changes to views in campgrounds, as opposed to tent camping.  Impact: CUA should cause no effect to viewsheds because delivered RVs and trailers would only occur in campgrounds and campsites presently allowing for RVs and trailers. No additional capacity for RV or trailer camping would be initiated.
<b>Visitor Use and Experience</b> Recreation Resources <i>Campsite Availability</i>	Potential	Issue: CUA Campsites for RV and trailer delivery would require the visitor to have previously reserved a campsite for the service to deliver an RV or trailer; the CUA holder (deliver service provider) would NOT be able to reserve campsites. Trailer delivery would be limited to reserve-able campgrounds, first-come-first-served sites could not be used for RV or trailer delivery.  Impact: No impact to campsite availability.
<b>Visitor Use and Experience</b> Visitor Use and Experience <i>Visitor experience</i>	Potential	Issue: The CUA would improve the visitor experience by broadening the camping experience to a wider breadth of visitors.  Impact: Beneficial impact to visitor experience.
<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:** Programmatic CE: RV/Trailer Delivery Service CUA

**Prepared by:** Wesley Wills    **Date Prepared:** 11/20/2020    **Telephone:** (209) 379-1455

**PEPC Project Number:** 98145

#### Locations:

**County, State:** Madera, CA

**County, State:** Mariposa, CA

**County, State:** Mono, CA

**County, State:** Tuolumne, CA

**Describe project:** See Categorical Exclusion

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

The APE includes park campgrounds with reserve-able campsites. Park campgrounds on a first-come-first-served basis will not be available for RV and trailer delivery services through this CUA.

### 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

**Historical Structures/Resources Notes:** Many park campgrounds have not been evaluated by for eligibility for listing on the National Register and are being treated as eligible for 106 purposes. Various paved surfaces, such as circulation roads and highways, are historic but are annually maintained and use of recreational vehicles will occur only on paved or designated graveled or dirt parking areas in campgrounds.

**Cultural Landscapes Present:** Yes

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

**Ethnographic Resources Present:** No

**Ethnographic Resources Notes:** Traditionally associated American Indian tribes have not been consulted regarding this CUA as it does not involve ground disturbance or other activities that may potentially impact properties with religious and cultural significance.

**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:** Hope Schear

**Date:** 11/12/2020

**Comments:** No HA/HLA 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:**

**Doc Method:** Park Specific or Other Programmatic Agreement

**[ X ] Anthropologist**

**Name:** Liz Williams

**Date:** 11/10/2020

**Comments:** This is continuation of an existing permit.

*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:** Park Specific or Other Programmatic Agreement

**Archeologist**  
**Name:** Wesley Wills  
**Date:** 11/10/2020  
**Comments:** This project does not involve ground disturbance.

*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:** Recreational vehicles must only drive and park in designated areas, especially in campgrounds.

**Doc Method:** Park Specific or Other Programmatic Agreement

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**No Reviews From:** Curator, Historical Architect, Historian, 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:** No  
**SHPO Sent:** NA  
**SHPO Received:** NA

**THPO Required:** NA  
**THPO Sent:** NA  
**THPO Received:** NA

**SHPO/THPO Notes:** None

**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:

- This Programmatic CE is approved only for actions explicitly described in PEPC 98145; any changes to actions or additional proposed actions must undergo review and approval by the Yosemite Environmental Planning & Compliance Office. The CUA holder will follow all terms specified in their CUA permit.
- Recreational vehicles must only drive and park in designated areas, especially in campgrounds.

**6. Assessment of Effect Notes:**

Project continues same type of use and same use levels for camping in park campgrounds. Project fits under Yosemite 2020 PA (14.e).

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

**Compliance Specialist**

**106**

**Coordinator** Hope Schear **Date:** December 22, 2020  
Hope Schear, 106 Coordinator

**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, Superintendent

*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:** 98145  
**Project Title:** Programmatic CE: RV/Trailer Delivery Service CUA  
**Project Type:** Commercial Use Authorization  
**Project Location:**  
    **County, State:** Madera, CA  
    **County, State:** Mariposa, CA  
    **County, State:** Mono, CA  
    **County, State:** Tuolumne, CA  
**Project Leader:** Ruth Middlecamp

### ESA

**Any Federal Species in the project Area?** Yes  
**If species in area:** No Effect  
**Was Biological Assessment prepared?**  
**If Biological Assessment prepared, concurred?**  
**Formal Consultation required?** No  
**Formal Consultation Notes:**  
Park has applicable Biological Opinions in place Fisher, Yosemite Toad, Sierra Nevada yellow-legged frog, and California red-legged frog. This activity will have no effect on endangered species in Yosemite, as long as mitigations are followed. The relevant protections for listed species are limited to obeying established speed limits throughout the park.

**Formal Consultation Concluded:**  
**Any State listed Species in the Project Area?** Yes  
**Consultation Information:** State-listed species like the great gray owl occur along roads but this project specifically will have no effect as long as mitigations are followed.  
**General Notes:**

**Data Entered**

**By:** Heather Mackey **Date:** Nov 23, 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?		No	Not in floodplain or flash flood hazard area.

A.2. Is Project in wetlands as defined by NPS/DOI?		No	Not in wetland as defined by NPS/DOI.
B. COE Section 404 permit needed?		No	No placement of fill in waters of the United States.
C. State 401 certification?		No	
D. State Section 401 Permit?		No	<b>Issue Date:</b> <b>Expiration Date:</b>
E. Tribal Water Quality Permit?		No	
F. CZM Consistency determination needed?			N/A
G. Erosion & Sediment Control Plan Required?		No	
H. Any other permits required?		No	<b>Permit Information:</b>
<b>Other Information:</b>			Project has no effect on floodplains or wetlands.

**Data Entered**

By: Ninette Daniele Date: Dec 10, 2020

**FloodPlains & Wetlands Mitigations**

*No Flood plains & 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?		No	
B. Is the only place to conduct this project in wilderness?		No	
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)		No	
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)		No	
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.			<b>Initiation Date:</b> <b>Completed Date:</b> <b>Approved Date:</b>
<b>Other Information:</b> Project does not occur in wilderness.			



**Data Entered**

**By:** Ninette Daniele **Date:** Dec 10, 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:		No

**Other Information:**

**Data Entered**

**By:** Ninette Daniele **Date:** Dec 10, 2020