



*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:** Rod Kennec, Project Manager, Yosemite National Park

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

**Subject:** NEPA and NHPA Clearance: 2022-051 Parkwide Routine Maintenance and Repair of Non-Historic Buildings/Structures Programmatic CE (PEPC: 100150)

The Superintendent and park interdisciplinary team have reviewed the proposed project and completed an impact analysis and documentation, and have determined the following:

- The project is not likely to adversely affect 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.

Projects which adhere to the terms, conditions, and procedures of this Programmatic CE will be cleared for all NEPA and NHPA compliance requirements, subject to review by the Environmental Planning and Compliance Branch.

**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:

### Accessibility

- The project manager will consult with the park's accessibility coordinator to review the proposed action to ensure adherence to the Architectural Barriers Accessibility Act Standards.

### Cultural Resources

- Any exterior work within a cultural landscape should be reviewed by a Historical Landscape Architect. Care should be taken to ensure that no bright or unusually reflective materials (glass, stainless, light-colored wire, etc.) are introduced as part of repairs, and new exterior elements within a historic district (ramps, junction boxes, meters, air conditioners, generators, etc.) should be reviewed by Preservation crew (Exhibit Specialists) or Historical Architect. All workplans and projects being placed under this PCE will be reviewed by cultural resources staff to identify which projects may require HA, HLA, or Preservation crew review and approval prior to implementation.
- All projects that include ground disturbance should be reviewed by cultural resources staff. Workplans and project descriptions should identify specific areas where ground disturbance is proposed so cultural resources staff may ensure no damage occurs to significant and intact archeological deposits or ethnographic resources.

- The park Cultural Resources Management (CRM) workgroup will review and approve (with sign-off in PEPC) all projects or workplans being placed under this PCE. Work that is determined to fall within the scope of the 2020 Yosemite Programmatic Agreement will follow all applicable avoidance measures in the PA. Within historic districts and cultural landscapes, exterior repairs to non-historic buildings shall be limited to replacement in kind only. Any modifications to the exterior of a building in a historic district or cultural landscape would require case by case review by appropriate Resources Management and Science Division (RMS) and Historic Preservation subject-matter experts and may require additional consultation activities with traditionally associated American Indian tribes and/or the State Historic Preservation Office.

### **General**

- Project managers implementing activities covered by this programmatic CE must follow the standard operating procedures (SOPs) and mitigation measures for programmatic CEs to ensure that potential impacts are minimized and the appropriate documentation and reporting of activities occurs. Refer to the programmatic CE SOPs on SharePoint under the Project Management/Environmental Planning and Compliance link for the most up-to-date version of the SOPs as they will be reviewed annually and updated as necessary as new mitigation measures and best practices are identified.
- Side casting of material and debris is prohibited in the park and must be transported to an established staging area reviewed by RMS Branch Chiefs. Construction debris, municipal waste, old asphalt and concrete, sheet metal, and treated lumber will be transported outside the park. These materials may be staged temporarily at established staging areas.

### **Health and Safety**

- Only pesticides approved by the park integrated pest manager and the Safety Office with a current Pesticide Use Permit will be used. All applications will be conducted by a licensed applicator and applications will be reported to the park integrated pest manager annually. No pesticides in the classification of neonicotinoid or rodenticide will be applied.
- Supervisors and employees shall treat safety as a top priority in their daily operations. This includes providing safety training, providing and utilizing personal protective equipment, maintaining safe working conditions, exercising vigilance, and complying with all safety related guidance, regulations, and policies. All employees are encouraged to report potentially unsafe or unhealthful working conditions to the YOSE Safety Office. (See SharePoint for YOSE Directives #3: Personal Protective Equipment, #5: Incident Reporting, #9: Hantavirus Risk Reduction Program, #10: Hazardous Materials Communication, #11: Job Hazard Analysis, #12 Report of Unsafe or Unhealthful Working Conditions, #13 Forklift Safety, #17 Lockout-Tagout #18: Defensive Driving Policy, #19, Blood Borne Pathogens, #20: Respiratory Protection, and #37: Plague Risk Reduction).
- If gaps or openings to building exteriors are discovered, contact the Environmental Health Specialist for proper exclusions to prevent entry of pests and rodents. Exclusion work must occur in accordance with specifications listed in the NPS Rodent Exclusion Manual.

### **Night Sky**

- Any changes to exterior lighting (e.g. increased fixture size or lumen output) will follow NPS guidelines for protecting night skies and viewsheds (e.g. downshielding lights).

### **Vegetation**

- All areas disturbed by trenching or earthwork will be returned back to their previous condition, either by preserving existing vegetation to the extent possible or by reseeding using approved seed.

## **Wildlife**

- Fences should have at least a 16 inch gap at the bottom (from the soil to the first barrier) to allow wildlife to pass underneath and be no taller than 40 inches from the ground to allow for the safe passage of wildlife.
- Conduct demolition, construction, and maintenance activities during daylight hours to avoid disturbance to nocturnal wildlife.
- For work that entails any holes, gaps, or hollow spaces greater than 0.75 inches in diameter, prevent entrapment of wildlife by capping any open-ended posts and installing wildlife escape ramps in open holes and trenches.
- For all projects occurring in Yosemite Valley, including those with interior work, workers will be informed to obey speed limits and drive slowly on warm, wet nights to avoid impacts to listed frogs that may be located on roadways.
- The Park Compliance Wildlife Biologist will review and approve (with a sign-off in PEPC) all projects or workplans being placed under this PCE. The wildlife biologist will determine if work will occur within areas potentially occupied by listed or special status species (not limited to but including animals listed under the federal Endangered Species act, such as the Yosemite Toad, Sierra Nevada yellow-legged frog, California red-legged frog, and Fisher, as well as special status species such as Spotted owl, Great Gray owl, certain bat species, migratory birds, or others) or impact wildlife habitat. For work in habitat for listed species, the project must follow all applicable conservation measures contained in the Biological Opinions issued to the park by the U.S. Fish and Wildlife Service. Certain activities, including tree-cutting, vegetation management, herbicide application, and work producing excessive noise (grading, paving, other activities requiring heavy equipment, as well as use of chainsaws, power tools, generators), are likely to be restricted during Limited Operating Period of March 1 to June 30 within certain habitat areas and/or likely to require biological monitoring or pre-work surveys (at the expense of the project), as directed by the park Compliance Wildlife Biologist.

**Superintendent Signature:** \_\_\_\_\_ Cicely Muldoon

**Date:** \_\_\_\_\_ March 27, 2022

*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:** 2022 Parkwide Routine Maintenance and Repair of Non-Historic Buildings/Structures Programmatic CE

**PEPC Project Number:** 100150

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

This Categorical Exclusion (CE) serves as a programmatic record for routine maintenance and repairs to non-historic buildings and structures in Yosemite National Park. This project is categorically excluded under NPS Director's Order #12, Action 3.3 C (3): Routine maintenance and repairs to non-historic structures, facilities, utilities, grounds, and trails (2015 NEPA Handbook). This CE is in accordance with the NPS Management Policies (2006), Endangered Species Act (1973), Director's Order 77 (Natural Resources Protection), Code of Federal Regulations Title 36, and the Superintendent's Compendium. The activities covered by this programmatic CE (PCE) are necessary to ensure visitor and employee health and safety, reduce the potential for environmental degradation, maintain aesthetics, provide or improve access, and prevent deterioration of existing facilities.

This CE supersedes PEPC 22759, and provides updates to proposed activities and resource protection measures.

This PCE is intended to cover routine interior and exterior maintenance within the developed footprint of non-historic buildings and structures and applies to all buildings that are less than 50 years old and are not listed in the Cultural Resources Inventory System (CRIS). Interior maintenance includes upgrading of facilities to meet code, painting, floor and window coverings, wall repairs, and installation and replacement of appliances and utilities in buildings. Exterior maintenance includes painting, roof replacement and repairs, masonry, and fencing. Within historic districts and cultural landscapes, exterior repairs to non-historic buildings are limited to replacement in kind only. The Secretary of the Interior's Standards for the Treatment of Historic Properties specifies that replacement in kind means that "the replacement material must match the old, both physically and visually (e.g. wood with wood)." Any modifications to the exterior of a building in a historic district or cultural landscape would require case by case review by appropriate Resources Management and Science Division (RMS) and Historic Preservation subject-matter experts.

All work covered under this PCE will be done in accordance with applicable codes. Standard construction tools and equipment will be used in all work, and include portable power and hand tools. Underground Service Alert (USA Dig) will be contacted a minimum of 48 hours prior to any planned digging to locate utilities. At this time, RMS will be automatically notified to identify the potential to affect archeological sites and to develop appropriate treatment measures, if necessary (including in previously disturbed areas).

### Compliance Review Process

#### Project Manager Submits Annual Workplan

Most work performed under this programmatic CE will be submitted in a workplan to the Environmental Planning and Compliance Office for review and approval on an annual basis, at least 4 months prior to the start date of the work plan.

Annual workplans will be entered into the PEPC system as a new project for review, approval, and record-keeping purposes. The PEPC entry should describe all proposed activities in the workplan or project in sufficient detail including the following:

- building locations, names, and numbers
- relevant photographs (uploaded into a single word file that includes captions of each photo),
- descriptions and locations of soil disturbance (with depth and dimensions of soil disturbance),
- a description of equipment and methods that would be used to accomplish work goals,
- maps of proposed work areas,
- plan drawings (if applicable) for proposed work, and
- anticipated schedule of work to be accomplished.

#### Project Manager Submits Stand-Alone Project Proposal

Stand-alone projects with activities that are covered in this PCE that are outside of the scope of an annual workplan will be submitted for review and approval by the compliance office at least 4 months ahead of the anticipated start date.

#### Interdisciplinary Team Reviews Proposal

Ideally, the project manager or work supervisor will present workplans or stand-alone projects at the monthly Project Planning Meeting (PPM) to facilitate comprehensive and expeditious review by park subject matter experts. The Compliance Office will provide guidance and documentation on those activities in the workplan which are fully covered by this PCE, those activities which are covered but which may require further compliance (e.g. consultation with Wildlife or the U.S. Fish and Wildlife Service, Tribes, U.S. Army Corps of Engineers, State Historic Preservation Office, etc.) and those activities which fall outside of the scope of this PCE and may need to be processed as a stand-alone CE.

#### Compliance Specialist Provides Compliance Complete Notification

Following the interdisciplinary review, the compliance specialist will draft the compliance complete documentation and provide it to the Project Manager. This documentation will specify that approved work performed under this programmatic CE must follow standard avoidance/minimization/mitigation measures and Standard Operating Procedures (SOPs) (attached here and also refer to the current SOPs for programmatic categorical exclusions found on SharePoint at Project Management/Environmental Planning & Compliance/Programmatic CEs). In addition to following requirements and mitigations contained in the Programmatic CE SOPs, the Project Manager must implement, in consultation with the park's subject-matter experts, the mitigations specific to routine grounds maintenance activities included in this CE document.

#### Programmatic CE Review and Updates

This document will be reviewed periodically to determine if any updates are needed. Any new activities, significant changes in technology or scope of work, or amendments to this PCE will trigger consultation with the Compliance Office, Facilities Management, and Resources Management and Science.

#### **Building/Structure Maintenance and Repair Activities**

The following activities are covered by this programmatic CE. Activities not listed, but similar in scope and scale, may be covered with Compliance Office approval.

Appliances: Work consists of replacing and installing appliances.

Carpentry: Work consists of repairing, modifying and minor construction to interiors and exteriors of existing structures.

Electrical work: Work consists of replacing electrical devices (switches, receptacles, etc.) and meter panels; installing new circuits, light fixtures, and transfer switches; repairing and installing phone, computer, and alarm circuitry.

Fencing: Work consists of repairing and replacing in kind existing fencing within the existing footprint.

Floor coverings: Work consists of installing carpet, vinyl, quarry tile, vinyl tile, laminate, and hardwood flooring, or other material such as new sustainable products.

Gas and propane work: Work consists of tank placement, replacement, relocation, testing and removal, as well as repairing and installing gas piping.

HVAC work: Work consists of replacing filters; repairing and replacing furnace and air conditioner components, installing vent fans, installing range hoods, repairing, replacing, and installing of wood stoves, and repairing, replacing, and installing of solar heating systems.

Insulation: Work consists of replacing and installing batt, blown-in, and pipe insulation.

Masonry: Work consists of forming and pouring steps, landings, piers, and small slabs, repairing rock work, repairing masonry foundations, repairing stucco, and repairing chimneys and fireplaces.

Painting: Work consists of prepping and painting interior and exterior applications, finishing and texturizing drywall, and plaster work.

Painting or staining includes scraping, power washing, caulking, priming, and painting of exposed building exterior surfaces. Protective tarps are placed around the structure. The building is then pressure washed and allowed to dry, sanded and scraped for prep, masked and sprayed with paint or stain applied by an air compressor-driven power sprayer. Painting is conducted on days with little wind to prevent drifting dust or mist. When painting near a waterway, shielding tarps are used.

Pest control: Work consists of treatments for exclusion and control of building-damaging pests. Pesticides treatments will be primarily limited to the interior of buildings. Pesticide application external to the building may be permitted in cases where insects are actively damaging the building. Pesticide application is limited to a ten-foot buffer of the building perimeter. Only pesticides approved by the park integrated pest manager and the Safety Office with a current Pesticide Use Permit will be used. All applications will be conducted by a licensed applicator and applications will be reported to the park integrated pest manager annually. No pesticides in the classification of neonicotinoid or rodenticide will be applied

Plumbing: Work consists of replacing and repairing faucets, valves, and toilets, clearing plugged waste lines, minor excavation for water and sewer line repairs, replacing and repairing water heaters, rehabilitating showers and baths, repairing and installing water and wastewater piping, and repairing and installing fire suppression systems. Underground utilities work within the existing, previously disturbed utility corridor may be required. Includes repair or replacement of vault toilets.

Porch and walkway work: Work consists of repairing and replacing of walkways, porches, patios, stairs, stoops, and landings, within the existing footprint. Specific activities may fall under carpentry and masonry.

Roofing: Work consists of repairing and replacing of existing roofing, roof sheathing, and roof structures and appurtenances, including gutters. Roof structure repairs will be performed if deficiencies are discovered upon removal of existing roofing materials. Damaged overhangs are repaired and re-painted as needed.

The maintenance (repair or replacement) of roof coverings is conducted to prevent water or moisture from entering the structure and causing interior damage. Maintenance will result in no net increase in impervious surface. Roofing materials include wood, slate, asphalt, tile, built-up (hot mop with tar over a base sheet), metal and rubber or vinyl. Old roofing is removed with shovels and pry bars, or with battery powered screwdrivers in the case of metal roofing. Tarpaper is installed as moisture barrier, and new roofing placed over the tarpaper. Roofing materials are applied with air compressor-driven nail guns, screw guns and air staplers. All refuse is removed from the area and hauled outside the park to an approved landfill.

Window covering: Work includes repairing, replacing, and installing window coverings.

**Mitigation(s):**

See Letter of Compliance Completion for Mitigations.

**CE Citation:** 3.3.C.3 Routine maintenance and repairs to non-historic structures, facilities, utilities, grounds and trails.

**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 Signature:** \_\_\_\_\_ Cicely Muldoon **Date:** \_\_\_\_\_ March 27, 2022

### Extraordinary Circumstances:

If implemented, would the proposal...	Yes/No	Explanation
<b>A.</b> Have significant impacts on public health or safety?	No	None
<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	None
<b>C.</b> Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources (NEPA section 102(2)(E))?	No	None
<b>D.</b> Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks?	No	None
<b>E.</b> Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects?	No	None
<b>F.</b> [Repealed per DOI] Have a direct relationship to other actions with individually insignificant, but cumulatively significant, environmental effects?	N/A	No longer applicable per the updated 2020 CEQ NEPA 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	None
<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	None
<b>I.</b> Violate a federal, state, local or tribal law or requirement imposed for the protection of the environment?	No	None
<b>J.</b> Have a disproportionately high and adverse effect on low income or minority populations (EO 12898)?	No	None
<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	None
<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	None





## ENVIRONMENTAL SCREENING FORM (ESF)

Updated Sept 2015 per NPS NEPA Handbook

### A. PROJECT INFORMATION

**Project Title:** 2022 Parkwide Routine Maintenance and Repair of Non-Historic Buildings/Structures  
Programmatic CE

**PEPC Project Number:** 100150

**Project Type:** Routine Maintenance (ROU)

**Project Location:**

**County, State:** Mariposa, CA

**County, State:** Tuolumne, CA

**Project Leader:** Rod Kennec

### 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>Dust, aerosols</i>	Potential	Issue: Some actions covered under this PCE will require the use of equipment that will temporarily affect air quality (e.g. trenching, pesticide application)  Impact: Any work causing dust or other air quality impacts will be highly localized and temporary in duration.
<b>Biological</b> Nonnative or Exotic Species	Potential	Issue: Construction equipment has the potential to introduce or spread invasive species.  Impact: The majority of equipment used to perform this work is expected to be small in scale and managed and cleaned internally by the park, limiting the chances of spreading exotic species. Any large-scale contracted equipment entering the park will follow standard inspection and cleaning protocols.

<b>Resource</b>	<b>Potential for Impact</b>	<b>Potential Issues &amp; Impacts</b>
<b>Biological</b> Species of Special Concern or Their Habitat <i>YOSE Toad, SNYLF, CARLF, Fisher, GGOW, Spotted Owl, bats, migratory birds</i>	Potential	<p>Issue: Work areas may overlap with areas occupied by special status species.</p> <p>Impact: Workplans being submitted under this PCE will be reviewed by the Park Wildlife Biologist to determine if any actions will occur in areas occupied by species of concern.</p>
<b>Biological</b> Vegetation	Potential	<p>Issue: Limited trenching work associated with existing utility lines is authorized by this PCE.</p> <p>Impact: All areas disturbed by trenching or earthwork will be returned back to their previous condition, either by preserving existing vegetation to the extent possible or by reseeding using approved seed.</p>
<b>Biological</b> Wildlife and/or Wildlife Habitat including terrestrial and aquatic species	None	None
<b>Cultural</b> Archeological Resources	None	Issue: All ground-disturbing work performed under this PCE will be associated with existing utility lines. No expansion of the area of ground disturbance is authorized.
<b>Cultural</b> Cultural Landscapes	None	<p>Issue: Many structures and buildings covered by this PCE are located with historic districts or other cultural landscapes.</p> <p>Impact: All exterior work performed under this PCE will be limited to replacement and repair in-kind. Exterior repairs that are not in-kind will require additional review by the Park's Cultural Resource Management team.</p>
<b>Cultural</b> Ethnographic Resources	None	Issue: All ground-disturbing work performed under this PCE will be associated with existing utility lines. No expansion of the area of ground disturbance is authorized.
<b>Cultural</b> Museum Collections	None	None
<b>Cultural</b> Prehistoric/historic structures	None	Issue: This PCE applies only to non-historic buildings and structures.
<b>Geological</b> Geologic Features	None	Issue: All ground-disturbing work performed under this PCE will be associated with existing utility lines. No expansion of the area of ground disturbance is authorized.

<b>Resource</b>	<b>Potential for Impact</b>	<b>Potential Issues &amp; Impacts</b>
<b>Geological</b> Geologic Processes	None	None
<b>Lightscares</b>	Potential	Issue: Light fixture replacement is authorized under this PCE.  Impact: Any changes to exterior lighting (e.g. increased fixture size or lumen output) will follow NPS guidelines for protecting night skies and viewsheds (e.g. downshielding lights).
<b>Other</b> Human Health and Safety	Potential	Issue: Poorly maintained facilities may pose health and safety risks to employees and visitors.  Impact: Conducting routine maintenance activities under this PCE is expected to ensure visitor and employee health and safety by addressing needed repairs.
<b>Other</b> Operational	Potential	Issue: Work performed under this PCE will streamline the performance of the essential work activities described.  Impact: Conducting routine maintenance activities under this PCE is expected to prevent the deterioration of existing facilities.
<b>Other</b> <i>Pesticides</i>	Potential	Issue: Limited pesticide application is authorized under this PCE.  Impact: Only pesticides approved by the park integrated pest manager and the Safety Office with a current Pesticide Use Permit will be used. All applications will be conducted by a licensed applicator and applications will be reported to the park integrated pest manager annually. No pesticides in the classification of neonicotinoid or rodenticide will be applied.
<b>Paleontological</b> Paleontological Resources	None	None
<b>Socioeconomic</b> Land Use <i>Employee Housing</i>	Potential	Issue: Work under this PCE will include routine maintenance and upkeep of Park employee housing.  Impact: Maintaining employee housing to current standards may make employment with the Park more desirable and housing options safer.
<b>Socioeconomic</b> Minority and low-income populations, size, migration patterns, etc.	None	None
<b>Socioeconomic</b>	None	None

<b>Resource</b>	<b>Potential for Impact</b>	<b>Potential Issues &amp; Impacts</b>
<b>Soundscapes</b>	Potential	Issue: Construction activities covered by this PCE may produce noise.  Impact: Noise associated with construction activities is expected to be localized and temporary.
<b>Viewsheds</b>	None	None
<b>Visitor Use and Experience</b> Recreation Resources	None	None
<b>Visitor Use and Experience</b> Visitor Use and Experience	Potential	Issue: Work under this PCE will include routine maintenance and upkeep of some Park buildings open to the public.  Impact: Maintaining these facilities will result in a more positive visitor experience.
<b>Water</b> Floodplains	None	Issue: Some work areas may take place within floodplains.  Impact: Work is generally replacement/repair/maintenance in-kind and will generally not add new features to floodplains.
<b>Water</b> Marine or Estuarine Resources	None	None
<b>Water</b> Water Quality or Quantity	None	None
<b>Water</b> Wetlands	None	None
<b>Water</b> Wild and Scenic River <i>Merced Wild and Scenic River, Tuolumne Wild and Scenic River</i>	None	Issue: Work performed under this PCE may take place within either the Merced or Tuolumne Wild and Scenic River corridors.  Impact: Work is generally limited to routine maintenance, repair, and in-kind replacement of non-historic built features. Work is not expected to impact the ORVs of the Wild and Scenic Rivers.
<b>Wilderness</b>	None	None



# ASSESSMENT OF ACTIONS HAVING AN EFFECT ON HISTORIC PROPERTIES

## A. DESCRIPTION OF UNDERTAKING

**1. Park:** Yosemite National Park

### **2. Project Description:**

**Project Name:** 2022 Parkwide Routine Maintenance and Repair of Non-Historic Buildings/Structures  
Programmatic CE

**Prepared by:** Daniel Sharon      **Date Prepared:** 03/31/2021      **Telephone:** (209) 379-1038

**PEPC Project Number:** 100150

#### **Locations:**

**County, State:** Mariposa, CA

**County, State:** Tuolumne, CA

#### **Describe project:**

See Categorical Exclusion Form

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

The APE is limited to the developed footprint of non-historic buildings and structures parkwide. This applies to all buildings and structures that are less than 50 years old and are not listed in the Cultural Resources Inventory System (CRIS). Interior and exterior work is authorized under this PCE, though exterior repairs on buildings and associated fencing and walkways within historic districts and cultural landscapes will be limited to replacement in-kind only. Ground-disturbing utility work will be limited to the previously disturbed utility corridor.

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

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

**Archeological Resources Present:** Yes

**Archeological Resources Notes:** Park-Wide project; presence/absence of resources determined on a site-by-site basis through review and approval of annual workplans.

**Historical Structures/Resources Present:** No

**Historical Structures/Resources Notes:** Park-Wide project; presence/absence of resources determined on a site-by-site basis through review and approval of annual workplans.

**Cultural Landscapes Present:** Yes

**Cultural Landscapes Notes:** Park-Wide project; presence/absence of resources determined on a site-by-site basis through review and approval of annual workplans.

**Ethnographic Resources Present:** Yes

**Ethnographic Resources Notes:** Park-Wide project; presence/absence of resources determined on a site-by-site basis through review and approval of annual workplans.

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

Yes/No	The proposed action will...
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>
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)
No	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:** 01/31/2022

**Comments:** The actions described under this PCE fit into the streamlined review categories of the Park's 2020 programmatic agreement. Please see conditions for further instructions.

*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:** Submit detailed project descriptions with the annual work plan or with individual project submissions after the work plan has been approved. Tribal consultation, approval to use the PCE, and final assessments of effect will be completed once sufficient detail is received by the compliance office.

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

[ X ] **Anthropologist**

**Name:** Liz Williams

**Date:** 04/13/2021

**Comments:** All projects that include ground disturbance should be evaluated by CR staff.

**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 ] **Archeologist**

**Name:** Wesley Wills

**Date:** 04/14/2021

**Comments:** The project involves ground disturbance in previously disturbed areas adjacent to existing buildings and includes various archeological sites.

**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:** Project managers will coordinate with an archeologist from the Branch of Anthropology for projects requiring ground disturbance to ensure no damage occurs to significant and intact archeological deposits.

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

[ X ] **Historical Architect**

**Name:** Donald Faxon

**Date:** 04/14/2021

**Comments:** See below.

**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:** As per PA, project specifies that "Within historic districts and cultural landscapes, exterior repairs to non-historic buildings are limited to replacement in kind only." Care should be taken to insure that no bright or unusually reflective materials (glass, stainless, light colored wire, etc.) is introduced as part of repairs, and new exterior elements (ramps, junction boxes, meters, air conditioners, generators, etc.) should be reviewed by Preservation crew (Exhibit Specialists) or Historical Architect for compliance within a historic district.

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

[ X ] **Historical Landscape Architect**

**Name:** Vida Germano

**Date:** 04/20/2021

**Comments:** Per the project description "Any modifications to the exterior of a building in a historic district or cultural landscape would require case by case review by appropriate Resources Management and Science Division (RMS) and Historic Preservation subject-matter experts."

**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:** Any exterior work within a cultural landscape should be

reviewed by a historical landscape architect. Work with CRM division to identify which projects need to be reviewed before implementation.

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

**No Reviews From:** Curator, Historian, Other Advisor

## **C. PARK SECTION 106 COORDINATOR'S REVIEW AND RECOMMENDATIONS**

### **1. Assessment of Effect:**

Select with X	Assessment of Effect
n/a	No Potential to Cause Effects
n/a	No Historic Properties Affected
X	No Adverse Effect
n/a	Adverse Effect

### **2. Documentation Method:**

☐ **A. Standard 36 CFR Part 800 Consultation**

Further consultation under 36 CFR Part 800 is needed.

☐ **B. Streamlined Review Under the 2008 Servicewide Programmatic Agreement (PA)**

The above action meets all conditions for a streamlined review under section III of the 2008 Servicewide PA for Section 106 compliance.

#### **Applicable Streamlined Review Criteria**

(Specify 1-16 of the list of streamlined review criteria.)

☒ **C. Undertaking Related to Park Specific or Another Agreement**

The proposed undertaking is covered for Section 106 purposes under another document such as a park, region or statewide agreement established in accord with 36 CFR 800.7 or 36 CFR 800.14.

☐ **D. Combined NEPA/NHPA Process**

Process and documentation required for the preparation of an EA/FONSI or an EIS/ROD to comply with Section 106 is in accord with 36 CFR 800.8.c.

☐ **E. Memo to Project File**

### **3. Consultation Information**

**SHPO Required:** No

**SHPO Sent:**

**SHPO Received:**

**THPO Required:** No

**THPO Sent:**

**THPO Received:**

**SHPO/THPO Notes:**



**Advisory Council Participating:** No

**Advisory Council Notes:**

**Additional Consulting Parties:** No

**4. Stipulations and Conditions:** Following are listed any stipulations or conditions necessary to ensure that the assessment of effect above is consistent with 36 CFR Part 800 criteria of effect or to avoid or reduce potential adverse effects.

**5. Mitigations/Treatment Measures:** Measures to prevent or minimize loss or impairment of historic/prehistoric properties: (Remember that setting, location, and use may be relevant.)

**Required Mitigations** - For the proposed project actions to be within compliance requirements during construction and/or project implementation, the following mitigations must be adhered to:

- Any exterior work within a cultural landscape should be reviewed by a Historical Landscape Architect. Care should be taken to ensure that no bright or unusually reflective materials (glass, stainless, light-colored wire, etc.) are introduced as part of repairs, and new exterior elements within a historic district (ramps, junction boxes, meters, air conditioners, generators, etc.) should be reviewed by Preservation crew (Exhibit Specialists) or Historical Architect. All workplans and projects being placed under this PCE will be reviewed by cultural resources staff to identify which projects may require HA, HLA, or Preservation crew review and approval prior to implementation.
- All projects that include ground disturbance should be reviewed by cultural resources staff. Workplans and project descriptions should identify specific areas where ground disturbance is proposed so cultural resources staff may ensure no damage occurs to significant and intact archeological deposits or ethnographic resources.
- The park Cultural Resources Management (CRM) workgroup will review and approve (with sign-off in PEPC) all projects or workplans being placed under this PCE. Work that is determined to fall within the scope of the 2020 Yosemite Programmatic Agreement will follow all applicable avoidance measures in the PA. Within historic districts and cultural landscapes, exterior repairs to non-historic buildings shall be limited to replacement in kind only. Any modifications to the exterior of a building in a historic district or cultural landscape would require case by case review by appropriate Resources Management and Science Division (RMS) and Historic Preservation subject-matter experts and may require additional consultation activities with traditionally associated American Indian tribes and/or the State Historic Preservation Office.

#### **6. Assessment of Effect Notes:**

Work is covered by the 2020 Yosemite Programmatic Agreement Categories 8 (Maintenance or Replacement of Non-Historic Utility Lines, Transmission Lines, and Fences), 11 (Meeting Accessibility Standards), 12 (Mechanical, Electrical and Plumbing Systems), and 15 (Actions to Non-Historic Buildings, Structures, and Landscapes).

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

**Section 106 Coordinator  
Signature:**

Hope Schear

**Date:**

March 24, 2022

#### **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 Signature:**

Cicely Muldoon

**Date:**

March 27, 2022



## Other Compliance/Consultations Form

**Park Name:** Yosemite National Park

**PEPC Project Number:** 100150

**Project Title:** 2022 Parkwide Routine Maintenance and Repair of Non-Historic Buildings/Structures  
Programmatic CE

**Project Type:** Routine Maintenance

**Project Location:**

**County, State:** Mariposa, CA

**County, State:** Tuolumne, CA

**Project Leader:** Rod Kennec

### ESA

**Any Federal Species in the project Area?** Yes

**If species in area:** Not Likely to Adversely Affect

**Was Biological Assessment prepared?** Yes

**If Biological Assessment prepared, concurred?**

**Formal Consultation required?** No

**Formal Consultation Notes:**

Routine actions covered by Fisher BO, California Red-Legged Frog BO, Invasive Plant Management BO

**Formal Consultation Concluded:**

**Any State listed Species in the Project Area?** Yes

**Consultation Information:** Action areas may overlap with habitat for federally listed endangered or threatened species, including Yosemite Toad, Sierra Nevada Yellow-Legged Frog, California Red-Legged Frog, and Fisher, as well as special status species such as Great Gray Owl. The Park Compliance Wildlife Biologist will review and approve all projects or workplans being placed under this PCE. To avoid adverse effects to species, project actions will adhere to applicable conservation measures contained in the Biological Opinions for these species.

**General Notes:**

**Data Entered by:** Daniel Sharon

**Date:** February 16, 2022

### 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?	Yes	Determined to be exempt from compliance with Director's Order #77-2 and no Floodplain Statement of Findings required.

Question	Yes/No	Details
<b>A.2. Is Project in wetlands as defined by NPS/DOI?</b>	No	Not in wetland as defined by NPS/DOI.
<b>B. COE Section 404 permit needed?</b>	No	No placement of fill in waters of the United States.
<b>C. State 401 certification?</b>	No	None
<b>D. State Section 401 Permit?</b>	No	<b>Issue Date:</b> <b>Expiration Date:</b>
<b>E. Tribal Water Quality Permit?</b>	No	None
<b>F. CZM Consistency determination needed?</b>	N/A	N/A
<b>G. Erosion &amp; Sediment Control Plan Required?</b>	No	None
<b>H. Any other permits required?</b>	No	<b>Permit Information:</b>
<b>Other Information:</b>	Yes	Some actions may take place within floodplains. Work is generally limited to replacement/repair/maintenance of features in-kind. A SWPPP may be required for actions that disturb more than 1 acre of soil.

**Data Entered by:** Daniel Sharon

**Date:** February 16, 2022

### **Floodplains & Wetlands Mitigations**

*No Floodplains & Wetlands mitigations are associated with this project.*

### **Wilderness**

Question	Yes/No	Notes
<b>A. Does this project occur in or adjacent to Designated, Recommended, Proposed, Study, Eligible, or Potential Wilderness?</b>	No	None
<b>B. Is the only place to conduct this project in wilderness?</b>	No	None
<b>C. Is the project necessary for the administration of the area as wilderness?</b>	No	None

Question	Yes/No	Notes
<b>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)</b>	No	None
<b>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)</b>	No	None
<b>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>	N/A	<b>Initiation Date:</b> <b>Completed Date:</b> <b>Approved Date:</b>
<b>Other Information:</b>	No	None

**Data Entered by:** Daniel Sharon

**Date:** February 16, 2022

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

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

**Other Information:**

Actions may take place within Wild and Scenic River corridors, and are not expected to impact ORVs. Localized air quality impacts related to maintenance activities may be addressed by water suppression, and would generally not rise to the level of requiring State Air Quality consultation. Work on accessible features will be consistent with the ABA and ADA.

**Data Entered by:** Daniel Sharon

**Date:** February 16, 2022