From:	Caroline D. Hall
То:	Anthony Veerkamp; Katry Harris; Roland-Nawi, Carol@Parks; Beason, Mark@Parks; Kitty Henderson
Cc:	Amy Cole; Elizabeth Merritt
Subject:	RE: NTHP concerns regarding MRP ROD
Date:	Thursday, May 22, 2014 9:51:41 AM
Attachments:	<u>~WRD000.jpg</u>

Thanks Anthony. We'll prepare a letter to the NPS expressing our concerns on Residence 1, as well as reiterating the need for an errata on the Sugar Pine Bridge (just in case).

From: Anthony Veerkamp [mailto:AVeerkamp@savingplaces.org]
Sent: Tuesday, May 20, 2014 7:31 PM
To: Katry Harris; Carol.Roland-Nawi@parks.ca.gov; Beason, Mark@Parks; Kitty Henderson; Caroline D. Hall
Cc: Amy Cole; Elizabeth Merritt
Subject: RE: NTHP concerns regarding MRP ROD

Hello all:

Thank you again for participating in yesterday's call. As promised, I phoned Kathleen Morse yesterday. We had a brief cordial conversation concerning the MRP in general and our concerns regarding the ROD in particular.

Regarding Sugar Pine Bridge, she appeared not to have been aware of the language in the Floodplain Statement, which she underscored was written by outside consultants. She said she understood how concerned we were about how future planning for Sugar Pine Bridge was framed, and how important the language to which we agreed in the PA was to us. She said that the park would post an errata sheet to the planning website noting that the language in the Floodplain statement was an error.

Regarding Residence 1, I was unable to pin her down as to whether the "Suitable locations for Residence 1 within Yosemite Valley have not been identified..." paragraph was there intentionally or not, though I'm guessing that it was intentional. She underscored that the plan calls for the removal of Residence 1 from its current location, but does not address whether it will be demolished or relocated. Kathleen also said that it might be reassuring to know that action on Res 1 was "10 or 15 years down the road"—there are many more pressing priorities. I responded that that was both reassuring and concerning—after all, as the condition of the building is only going to worsen, it would be better explore options sooner than later. I also noted that identifying potential relocation sites was an essential prerequisite to talking with partners about potential reuses.

Kathleen responded that she saw no reason not to begin a discussion with the consulting parties soon (this year) to explore potential relocation/reuse options. She said that she would reach out to the consulting parties after she gets back from vacation. Based on my conversation, I do not think that we can expect a "correction" to this language; OHP and ACHP may want to consider expressing your concerns with the park directly.

Separately, the NTHP will likely draft a letter to the NPS to express our concerns regarding the weakness of the determination of non-impairment. While the park may be able to make a credible

argument that the MRP can pass a straight-face test for non-impairment of historic resources, the language in the ROD fails to even try. In our opinion, to conclude that adverse effects do not rise to the level of impairment because "change is inherent within the Yosemite Valley landscape" is not acceptable.

Best, Anthony

Anthony Veerkamp | FIELD DIRECTOR P 415.947.0692 ext. 38228 M 415.425.7779

NATIONAL TRUST FOR HISTORIC PRESERVATION San Francisco Field Office 5 Third Street, Suite 707, San Francisco, CA 94103-3208 www.PreservationNation.org

Please make sure that you have saved my new email address AVeerkamp@savingplaces.org to your address book; anthony_veerkamp@nthp.org will soon be discontinued.

From: Katry Harris [mailto:kharris@achp.gov]
Sent: Friday, May 16, 2014 11:55 AM
To: Anthony Veerkamp; John Fowler; Carol.Roland-Nawi@parks.ca.gov; Beason, Mark@Parks; Tom McCulloch; Kitty Henderson
Cc: Amy Cole; Betsy Merritt; Caroline D. Hall
Subject: RE: NTHP concerns regarding MRP ROD

Anthony –

Caroline Hall would also like to participate from the ACHP (Tom McCulloch and John Fowler will not) in the phone meeting. Her schedule is also open on Monday. Her availability on Tuesday is the opposite of mine. A meeting on Monday would be best for us.

Katry Harris, Program Analyst ACHP (202) 606-8520 until 5/28/2014 (202) 517-0213 after 6/2/2014

From: Anthony Veerkamp [mailto:AVeerkamp@savingplaces.org]
Sent: Friday, May 16, 2014 2:04 PM
To: John Fowler; Carol.Roland-Nawi@parks.ca.gov; Beason, Mark@Parks; Tom McCulloch; Kitty Henderson; Katry Harris
Cc: Amy Cole; Elizabeth Merritt
Subject: NTHP concerns regarding MRP ROD

Hello all:

I am writing to raise the National Trust's concerns regarding the Merced River Plan ROD. You may

not all have seen the document yet, which has had a rather peculiar reveal—it was posted to the YOSE website on March 31, but the notice of availability only appeared in the Federal Register on May 6. To the best of my knowledge, consulting parties have not yet been formally notified of its availability.

http://www.nps.gov/yose/parkmgmt/upload/MRP_ROD_package_Full_web.pdf

https://www.federalregister.gov/articles/2014/05/06/2014-10367/notice-of-availability-of-record-of-decision-for-merced-river-comprehensive-management-plan-yosemite

Attached you will find an analysis that I've prepared with assistance from Betsy Merritt and Amy Cole. As you'll see, we have three major concerns regarding the ROD:

- Language regarding the Superintendent's House & Garage that suggests that the park has no intention of seriously exploring options to relocate the property;
- Language regarding future planning for Sugar Pine Bridge that is in direct conflict with the PA;
- A Determination of Non-Impairment for historic properties that is based on the arguments that the plan benefits natural resources and that "change is inherent" in Yosemite.

We would welcome a discussion with you all regarding our concerns. Amy Cole and I plan to contact Kathleen Morse on Monday specifically to discuss the conflicting language regarding Sugar Pine Bridge. We assume the inconsistency is unintentional, and is yet another case of old language slipping into final documents. I will be out of the country starting next Wednesday, but we would be happy to try to arrange a call before I leave. Failing that, we could schedule call for while I'm away.

Please let Amy and me know if you would like us to try to schedule a call for Monday or Tuesday.

Best,

Anthony

Anthony Veerkamp | FIELD DIRECTOR P 415.947.0692 ext. 38228 M 415.425.7779

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