

### **United States Department of the Interior**

NATIONAL PARK SERVICE Yosemite National Park P. O. Box 577 Yosemite, California 95389

IN REPLY REFER TO: H3015 (YOSE-PM)

### CERTIFIED MAIL RETURN RECEIPT REQUESTED

FEB 0 8 2017

Julianne Polanco
State Historic Preservation Officer
Office of Historic Preservation
1725 23<sup>rd</sup> Street, Suite 100
Sacramento, California 95816

Attention:

Mark Beason, State Historian II

Subject:

National Historic Preservation Act Section 106 Consultation for Schematic Design in Half Dome Village

(Camp Curry Developed Area of the Yosemite Valley Historic District)

(Merced River Plan Implementation)

- Establish Undertaking (36 CFR § 800.3)
- Determination of Area of Potential Effects (36 CFR § 800.4)
- Identification of Historic Properties Affected (36 CFR § 800.4)

30-day response requested

Dear Ms. Polanco:

The National Park Service (NPS) at Yosemite National Park is conducting National Historic Preservation Act (NHPA) Section 106 consultation with your office and the other signatories of the *Merced Wild and Scenic River Comprehensive Management Plan (Merced River Plan) Programmatic Agreement* (MRP PA) regarding a comprehensive schematic design effort for Half Dome Village. The project area is identified in enclosure 1. This design will address overnight visitor use capacity and land use components of the Merced River Plan as approved in the June 2014 Record of Decision. The 2014 Merced River Plan (MRP) Final Environmental Impact Statement and associated PA identifies components of this project as both Category 2 and Category 3 actions with known adverse effects to historic properties. The MRP Category 2 and 3 Section 106 review processes are, as excerpted from page 5 of the MRP PA, identified as:

### Category 2 – Adverse Effect

Exhibit 5 presents a table of actions in the Merced River Plan undertaking that have been determined, based on known historic properties and clear action descriptions – in consultation with SHPO, ACHP, traditionally-associated American Indian tribes and groups, and other consulting parties – to result in an "Adverse Effect" that cannot be avoided.

Therefore, the NPS would continue consultation with the SHPO, ACHP, traditionally-associated American Indian tribes and groups and other consulting parties (including the public), consistent with 36 CFR § 800.5 to minimize or mitigate adverse effects and shall seek ways to resolve adverse effects through project-specific agreements per 36 CFR § 800.6(b) and(c).

- The NPS will initiate consultation for Category 2 project-specific agreements via correspondence from the Park Superintendent to the signatory and concurring parties of this agreement in advance of project implementation.
- A description of the adverse effects to historic properties that are associated with the project and a general schedule for project completion will be provided with this initial communication.
- The goal of continued consultation on Category 2 actions will be agreement among the consulting parties on the minimization and mitigation measures to be included in the Memorandum of Agreement for each project.

### Category 3 Actions - Identification, Evaluation and Assessment of Effects to be Determined

Exhibit 6 presents a table of actions in the Merced River Plan undertaking that have been determined, based on known historic properties and clear action descriptions – in consutation with SHPO, ACHP, traditionally-associated American Indian tribes and groups, and other consuting parties – to necessitate further identification, evaluation and/or assessment of effects determinations will be guided by 36 CFR Part 800 and the 2008 Nationwide PA.

The MRP PA described this undertaking and potential effect as the following (as excerpted from pages 60 and 65):

#	Project Name	Project Description	Assessment of Direct, Indirect, and Cumulative Adverse Effects
6	Remove 23 historic canvas tent cabins and construct 52 cabin with-bath units in Boys Town. Redesign and formalized the Curry Orchard parking area to accommodate 415 parking spaces.	Total would be 482 guest units, including: 301 tents in Curry Village retained; at Boys Town retain 50 historic canvas tent cabins and 14 non-historic hard-sided cabinswithout-bath; construct 52 new with bath cabins (within existing development footprint at Boys Town); 18 units at Stoneman House retained; and 47 cabin-with-bath units in Curry Village retained. The Curry Orchard Parking area would be formalized to have 415 parking spaces.	Adverse effect due to removal of 23 contributing resources. Assessment of effect to be determined for new development within the Camp Curry and Yosemite Valley Historic Districts. Assessment of effects to be determined for historic district that may result from redesign of the orchard parking area. The NPS and American Indian tribes and groups will continue to collaborate on resources management and historic preservation activities guided by existing cooperative agreements to ensure that adverse effects to historic properties with traditional religious and cultural significance can be avoided.

Cat	Category 3 Actions – Identification, Evaluation and/or Assessment of Effect to be Determined							
#	Project Name	Project Description	Assessment of Direct, Indirect, and Cumulative Adverse Effects					
22	Stoneman Meadow and Curry Orchard parking lot: road through meadow and parking lot	The Orchard Parking Lot would be re-designed and engineering solutions applied to promote water flow and improve meadow health to increase drainage from the cliff walls to Stoneman Meadow. Remove apple trees and replace with native vegetation.	No adverse effect to Stoneman Meadow due to low impact ecological restoration designed to improve the historic setting of the contributing meadow. The NPS and American Indian tribes and groups will continue to collaborate on resources management and historic preservation activities guided by existing cooperative agreements to ensure that adverse effects to historic properties with traditional religious and cultural significance can be avoided.					

### Project Undertaking (§ 800.3)

The MRP calls for an overall reduction in lodging units in Boys Town from 503 to 482 units. Additionally, 24 non-historic concessioner employee tent cabins will be removed. Seventy-three of the current 123 visitor tent cabins (a mixture of historic and non-historic cabins) in Boys Town will be removed and replaced with 52 new hard-sided units comprised of a mixture of duplex and four-plex cabins. The footprint of the new development will be determined through the current schematic design and feasibility study effort. Fifty tent cabins will be retained and design will maximize the preservation of historic character.

During construction of the 52 hard-sided units, the Boys Town tent cabins (including tent cabins from historic locations) would be temporarily relocated throughout the Half Dome Village concessioner land assignment. The tents and a modular shower house would be temporarily relocated to the former ice rink area and connected to the appropriate utilities. A maximum of 92 tents would be relocated at one time, however, phased construction may provide opportunities for fewer tents to be relocated throughout the phases of construction while maintaining the overall desired inventory.

This project also includes the redesign of the Curry Orchard Parking area to accommodate 415 vehicles. A separate Category 3 action calls for the redesign of the Camp Curry Orchard Parking Area to promote storm water flow through the parking area and improve meadow health. This will include grading, rehabilitation of historic culverts in Boys Town, and re-establishment of drainage paths in the orchard parking area. Appropriate paths of travel through the redeveloped areas will also need to be established. This MRP action would consider removal of the historic orchard and replacement with native vegetation as one of the design options to meet programming needs.

### Area of Potential Effects (APE) (§ 800.4)

The APE for the project includes the combined National Register boundaries of the 2006 Yosemite Valley Historic District (which includes Boys Town as a part of the Camp Curry Developed Area), the Camp Curry Historic District (1979), and the Yosemite Valley Archeological District (1976). The vertical APE extends to one meter below grade in previously disturbed soils. A map of the project location within the APE is included as enclosure 2.

### **Identification of Historic Properties (§ 800.4)**

<u>Archeological</u>: The projects are located within the Yosemite Valley Archeological District. Since 1985, most of the archeological work within the vicinity of the project area consists of archeological construction monitoring for installation and repair of underground utilities (approximately three projects). There were no significant archeological findings and sub-surface deposits indicate the area is highly disturbed due to the amount of historic and modern park development and infrastructure. There are no archeological sites located within the project area.

<u>Properties with religious and cultural significance</u>: During the Merced River planning process, the traditionally associated American Indian tribes and groups did not identify any historic properties with religious or cultural significance within the project area. The park is concurrently requesting confirmation from the traditionally associated American Indian tribes and groups that no historic properties of this nature would be affected.

Historic: The undertaking occurs within Boys Town which is located within the Camp Curry Developed Area within the broader Yosemite Valley Historic District (2006). The Yosemite Valley Historic District nomination identified 73 tent cabins in historic locations in Boys Town that endured from the period of significance ending in 1942. There are currently 123 tent cabins in Boys Town. Tent cabins were added in this area to replace the lodging units lost during the 2008 rockfall. The Camp Curry Historic District (1979), which does not include Boys Town within its boundaries, is located adjacent to the project area and is where tent relocation is proposed. Photos of the historic buildings and structures affected by this undertaking are included in enclosure 3.

# Concurrent Consultation Options for the Curry Village Rockfall Hazard Zone Mitigation Memorandum of Agreement (2011 MOA)

Eleven of the 24 remaining historic bungalows in the Camp Curry Historic District (within the Camp Curry Developed Area of the Yosemite Valley Historic District) are proposed for removal or possible relocation based on the results of the park's 2012 rockfall risk assessment. These bungalows were not addressed in the MRP, nor were they considered in the Curry Village Rockfall Hazard Zone Mitigation MOA (2011 MOA). The park plans to remove/relocate these 11 bungalows to address life/safety concerns because of their location within revised rock fall hazard analysis. The current design effort in Boys Town and the orchard parking area may consider options for removing/relocating these historic buildings.

During consultation with your office on the MRP, you requested that the park postpone further consultation associated with amending the 2011 MOA. This allowed your office the opportunity to better assess the consequences of the effects of the removal of these additional bungalows in association with those actions in Half Dome Village that were called for in the MRP. Now that the MRP is finalized and the park is implementing actions that have an adverse effect on the Camp Curry Developed Area, the park is proposing to restart discussions to amend the 2011 MOA.

The park has identified two options that your office may want to consider related to the Section 106 consultation for the Boys Town project:

- 1. The first would be to address removal or relocation of the bungalows as a separate undertaking that would be addressed through an amendment to the 2011 MOA. A second MOA would be developed to tier from the MRP PA to address the adverse effects of the Boys Town and orchard undertaking.
- 2. A second option would be to develop a single MOA addressing the Boys Town, orchard, and bungalow actions in one consultation effort. Under this scenario, the 2011 MOA would remain as originally written and implemented as is (the majority of mitigations have been completed as summarized in the park's annual report). A separate MOA would be developed to resolve adverse effects of the actions included in the current design effort. This could allow the consulting parties to minimize and/or mitigate the effects to the Camp Curry Developed Area of the Yosemite Valley Historic District in a more integrated manner.

We will proceed with option 1 as previously discussed during the MRP unless your office otherwise notifies the park of a different consultation path.

Because of the complex history of work in this area, the park has included a Summary of Past Actions at Half Dome Village 2006-2013 (enclosure 4) and a Summary of Present and Future Actions at Half Dome Village (enclosure 5).

# Notification of the MRP PA Signatories and Yosemite's Seven Traditionally Associated American Indian Tribes and Groups

The NPS will continue to consult with the traditionally associated American Indian tribes and groups [per 36 CFR § 800.4(c)(2)] throughout the project. The park is concurrently notifying the Advisory Council on Historic Preservation, the National Trust for Historic Preservation, and the Historic Bridge Foundation regarding these actions to provide them opportunity to consult per the MRP PA. We will notify your office if any of these parties decide to participate in this consultation.

### **Project Schedule**

Preliminary schematic designs for new construction will be developed in early 2017. The park will be conducting a value analysis this spring to consider design options and will continue to consult with your office as project design progresses. Construction is anticipated to begin in 2018 and be completed in 2023. The concessioner contract requires that construction at Boys Town be completed by March 1, 2023. The removal/relocation of the bungalows is anticipated in 2023.

The park is requesting SHPO concurrence on the park's determination of the APE and the identification of historic properties affected within 30 days of receipt of this letter. Please direct any questions or requests for additional information to Kimball Koch, Historic Preservation Officer, at kimball\_koch@nps.gov or (209) 379-1364.

Sincerely,

### /s/ Woody Smeck

Woody Smeck Acting Superintendent

#### **Enclosures:**

- 1) Project Location Map
- 2) APE Map
- 3) Photos of Historic Buildings and Structures in Half Dome Village Planned for Removal, Relocation, and/or Rehabilitation
- 4) Summary of Past Actions at Half Dome Village 2006-Present
- 5) Summary of Present and Future Actions at Half Dome Village

### Electronic cc w/out enclosures:

Erin Davenport, Compliance Specialist, Yosemite National Park

Darrin Miller, Project Manager, Yosemite National Park

Kimball Koch, Historic Preservation Officer, Yosemite National Park

Madelyn Ruffner, Branch Chief, Environmental Planning & Compliance, Yosemite National Park

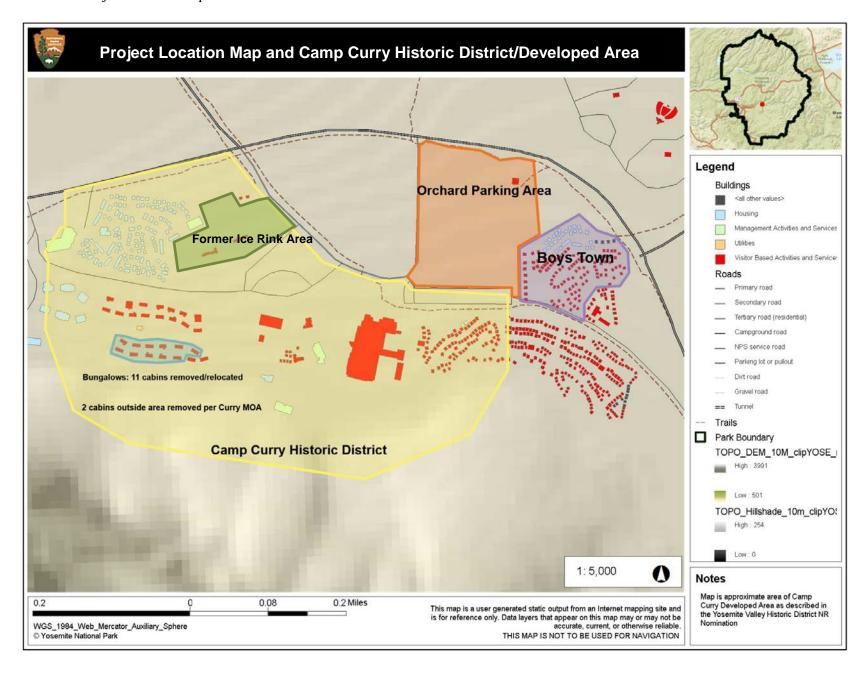
Eirik Thorsgard, American Indian Liaison, Yosemite National Park

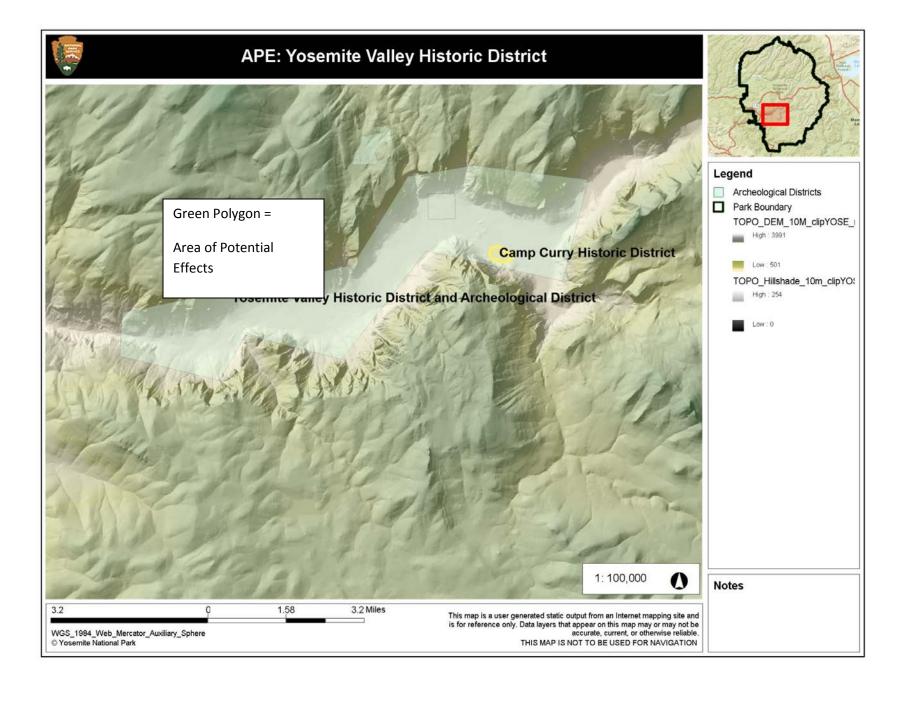
Scott Carpenter, Cultural Resources Program Manager, Yosemite National Park

Linda C. Mazzu, Division Chief, Resources Management & Science, Yosemite National Park

Kathleen S. Morse, Division Chief, Strategic Planning, Yosemite National Park

Enclosure 1 – Project Location Map





Enclosure 3 – Photos of Historic Resources in Half Dome Village Planned for Rehabilitation and/or Removal



Tent Cabins in Boys Town



Apple Picking in Curry Village Orchard Parking Area



Historic Bungalow Cabin #19 in Half Dome Village

Enclosure 4 – Summary of Past Actions at Half Dome Village 2006-2013

Date	PEPC No.	106 Compliance	Project Description
2006	14775	1999 PA	Rehabilitate 11 guest tent cabins as accessible units and modified for compliance with accessibility
			standards; tent sizes were expanded and travel paths were built.
2007	19841	1999 PA	Relocate 9 guest tent cabins from the rockfall hazard zone to an area near Mother Curry Bungalow.
			These tent cabins were again relocated to Boys Town in 2013.
2009	25600	1999 PA	Install modular shower house units to replace bathing facilities closed in the rockfall hazard zone.
2009	23970	1999 PA	Construct 51 employee housing units and 2 shared facilities were constructed at Huff House.—
2009	24623	1999 PA	Construct 24 units and support facilities at Boys Town – Implemented employee housing relocation plan as presented by the settlement agreement These employee tent cabins will be removed in 2016.
2010	29564	1999 PA	Remove 2 guest cabins (bungalettes containing 3 without bath units) – these cabins were
			substantially demolished by the 2008 rockfall incident.
2010	30466	1999 PA	Extend an accessible path of travel to several temporary employee and visitor facilities in Boys
			Town, Huff House, and Curry Village Shower House.
2010	32175	1999 PA	Provide a 20' X 40' designated outdoor communal BBQ area for Huff House residents.
2010	34007	1999 PA	Relocate 15 guest tent cabins from the rockfall hazard zone to Curry Village East ("Blackberry") and
			infill locations within designated guest tent cabin areas.
2012	29566	Standard review per	Curry Village Rockfall Hazard Zone Structures Project; 71 structures were removed from the
	EA/FONSI	36 CFR 800	rockfall hazard zone including 21 with-bath historic bungalows (plus 1 non-historic reconstructed
			bungalow), 44 without-bath historic bungalettes, 2 historic restroom buildings, Terrace Clubhouse,
	20212	4000 7	and Foster Curry bungalow (Tressider House).
2012	30715	1999 PA	Rehabilitate 15 of the historic bungalow buildings and Cabin 819 - to be completed in 2017.
2012	44611	1999 PA	Replace 91 double-wall "signature" tents with 91 single-wall canvas tents, incorporated rodent exclusion features.
2013	37796	1999 PA	Add 38 guest tent cabins to Curry Village East, Boys Town and other infill locations to offset the
			loss of 28 tent cabins and 5 bungalows after the rockfall hazard policy was finalized.
2013	46836	1999 PA	Relocate and expand existing propane farm centrally located among the lodging units of Boys Town.
2016	MRP	MRP PA Category 3-Row 2	Relocate Bike and Raft Rentals – Relocate commercial services (bicycle and raft rental stands and storage facilities) to areas outside the river corridor.
2016	MRP and	MRP PA	Reduce the number of visitor tent cabins by 21 for an overall total of 482 lodging units in Half Dome
	concessioner contract	Category 3 -Row 6	Village. Remove 24 non-historic employee tent cabins.
2016/2017	MRP	MRP PA Category 3-	Remove Ice Rink and Establish Temporary Ice Rink Location and Associated Infrastructure –
		Row 2	Remove non-historic ice rink and associated buildings. There are currently no plans to repurpose the historic Bike Shop/Skate Rental building.

Enclosure 5 – Summary of Present and Future Actions at Half Dome Village

Date	Driver/ Planning	106 Compliance	Project Description
	Document		
2018	Construction	New Project	Relocate Boys Town Lodging During New Construction – Temporarily relocate visitor tent cabins
	Management		from Boys Town to the current ice rink area during Boys Town construction.
2019	MRP	MRP PA	Remove historic canvas tent cabins and construct 52 cabin with-bath units in Boys Town. Redesign
		Category 2-Row 6	and formalize the Curry Orchard parking area to accommodate 415 parking spaces.
2019	MRP	MRP PA	The Orchard Parking Lot would be re-designed and engineering solutions applied to promote water
		Category 3 -Row 22	flow and improve meadow health to increase drainage from the cliff walls to Stoneman Meadow.
			Remove apple trees and replace with native vegetation.
2019	MRP	MRP PA	Rehabilitate Half Dome Village Day Use Parking Area (former ice rink area) for 134 parking spaces
		Category 3 – Row 2	
2018	Concessioner	New Project	Rehabilitate Non-Historic Half Dome Village Pavilion – Improve food and beverage operations,
	contract		product quality, consistency, and availability
2020-2022	MRP and	MRP PA	Provide 52 lodging units in Boys Town comprised of duplex and four-plex cabins with private
	concessioner	Category 2 -Row 6	bathrooms
	contract		
2023	2012 Rock Fall	2011 Rockfall MOA	Remove or relocate 11 historic bungalow cabins in the rockfall hazard area
	Hazard Analysis		
TBD	MRP	MRP PA Category 3	Remove Huff House Employee Housing - Remove non-historic tents, cabins without bath, and
		– Row 2	supporting modular structures from the Huff House area that currently houses 258 employees; Retain
			10 tent cabins and historic Peterson House to house 24 employees.
TBD	MRP	MRP PA Category 3	Relocate Campground Reservation Service – Relocate the service from northeast corner of the orchard
		– Row 22	parking area to a more prominent and accessible location. The non-contributing building currently
			housing the campground reservation office may be removed.
TBD	MRP	MRP PA Category 3	Ecological Restoration - Oak woodland restoration north of Huff House; Meadow restoration west of
		– Row 26	Orchard.