



United States Department of the Interior

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

IN REPLY REFER TO:
L7617 (YOSE)

Memorandum

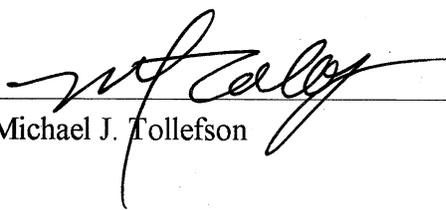
JUL 01 2004

To: Tim Ludington
From: Superintendent, Yosemite National Park
Subject: Categorical Exclusion for Project Number 2004-057
Routine Trail Maintenance, 2004-2006

Your proposed project is an action that has been determined to result in no measurable environmental effects. It is therefore Categorically Excluded from further National Environmental Policy Act analysis under the category: DO12 3.4.C.04, *Routine maintenance and repairs to cultural resource sites, structures, facilities, utilities, grounds under an approved Historic Structures Preservation Guide or Cyclic Maintenance Guide (or equivalent guides); or if the action would not adversely affect the cultural resource.*

Necessary compliance coordination has been completed with regards to the National Historic Preservation Act (NHPA), the Wild and Scenic Rivers Act, and the Endangered Species Act. This project clearance is valid under the condition that you adhere to the conditions stated in the attached environmental screening form and XXX (when attached) when implementing this project.

On the basis of the environmental impact information in the statutory compliance file, with which I am familiar, I am categorically excluding the described project from further NEPA analysis. No exceptional circumstances or conditions in Section 3-6 apply, and the action is fully described in Section 3-4 of DO-12.



Michael J. Tollefson



Date

cc: Statutory compliance file
Enclosure (2)

Environmental Screening Form**I. Project Information**

Project Title: Routine Trail Maintenance, 2004-2006

Project Manager: Tim Ludington

Division: Facility Management

PMIS #: N/A

Start Date: 4/1/2004

Completion Date: 12/31/2006

Location: Parkwide

Brief Project Description:

This CE is designed to cover routine trail maintenance and repair activities that have no potential for measurable impact. Maintenance is necessary to ensure visitor safety and enjoyment, and to promote resource protection by encouraging trail use. Activities covered include: rebuilding damaged/deteriorated walls, trail tread, drainage structures, creek fords, bridge abutments, and other structural elements; rebuilding and repairing trail bridges including replacement of bridge stringers, decking and railings and repairs to bridge abutments; removing fallen trees and rocks from trail corridor; repairing sections where erosion has compromised trail integrity; {and maintenance and repair of asphalt paths and multi-use trails [language added by CE 2005-090]}. A list of specific activities and definitions is included with the PIF. This CE is not intended to cover extensive trail reroutes, bridge abutment relocation, archeological and wilderness clearance for trail crew campsites, helicopter support, or activities occurring at a great distance from the trail corridor.

June 9, 2004- The project description is modified as follows, in accordance with recommendations from the park cultural resource staff: Replacement of deck treads and handrails due to wear, deterioration or nature are covered under this CE/XXX. Rebuilding structural items such as bridge abutments and stringer replacements will require case by case review by park cultural resource staff.

August 18, 2005: this Project Description is amended by CD 2005-090, as follows:

"It is the intention of CE 2004-057 to cover the use of historically used trail crew camps once archeological clearance is completed, according to the procedure outlined in the document "Preservation Planning Objectives and Procedures", attached, and stipulated as a condition of the Section 106 compliance (see project XXX). This CE does not apply to the establishment of trail crew camps at new locations not historically used. Establishing such new camps requires a separate CE and NEPA/NHPA review process."

Environmental Screening Form

Planning and Compliance Background (If box checked, then YES):

- Has compliance already been completed?
Provide name of compliance document, compliance tracking number, and date of signature:

 - Is this project explicitly called for in a completed (not draft) park planning document?
Indicate which plan:
Provide page number(s) from the plan which reference this project:
Is this project still consistent with the approved plan? (If NO, prepare EA/EIS)

 - Does this project require consultation with any federal, state, local agency, or tribes?
Provide name of agency and dates consulted:

 - Must a Wilderness Minimum Requirement Analysis be completed?
Date received from PM by Planning and Compliance: MRAs to be done on case-by-case basis when helicopter use is proposed.
-

Environmental Screening Form**II. National Environmental Policy Act Checklist**

Does the proposed project potentially (If box checked, then YES):

- Adversely impact public health and safety?
- Adversely impact historic or cultural resources, wilderness, wild and scenic rivers, aquifers, prime farmlands, wetlands, floodplains, ecologically critical areas, or Natural Landmarks?
- Have highly controversial environmental effects?
- Have highly uncertain and potentially significant environmental effects or involve unique or unknown risks?
- Establish a precedent for future actions resulting in significant environmental effects?
- Relate directly to other actions with individually insignificant but cumulatively significant environmental effects?
- Involve unresolved conflicts concerning alternative uses of available resources?
- Adversely affect properties listed or eligible for listing on the National Register of Historic Places?
- Adversely impact a species listed or proposed to be listed as Federally threatened, endangered or adversely impact designated critical habitat for these species?
- Violate any federal, state, local or tribal laws or requirements imposed for the protection of the environment, such as Executive Order 11098 (Floodplains Management) or Executive Order 11090 (Protection of Wetlands) or Fish and Wildlife Coordination Act or Wilderness Act?
- Have a disproportionate, significant adverse effect on low-income or minority populations?
- Contribute to the introduction, continued existence, or spread of non-native invasive species?
- Contribute to the introduction, continued existence, or spread of federally listed noxious weeds?
- Require a permit from a federal, state, or local agency to proceed, unless the agency from which the permit is required agrees that a CE is appropriate?
- Have the potential for significant impact as indicated by a federal, state, or local agency or Indian Tribe?
- Have the potential to be controversial because of disagreement over possible environmental effects?
- Have the potential to violate the NPS Organic Act by impairing park resources or values?
- Restrict access to, and ceremonial use of Indian sacred sites by Indian religious practitioners or adversely affect the physical integrity of such sacred sites?

NEPA Comments/Conditions:

If any of the above exceptions apply and cannot be avoided or mitigated, the project cannot be Categorical Excluded and an EA or an EIS is required.

Environmental Screening Form**III. YNP Checklist**

Does the project contribute to measurable impacts on (If box checked, then YES):

- Geologic resources (i.e. Soils, Bedrock, Streambeds, etc.)?
- Air quality?
- Soundscape (i.e. Increase Noise, Affect Natural Sounds)?
- Water quality/quantity or streamflow characteristics?
- Types and levels of land use, including occupancy, income, values, and/or ownership?
- Unique ecosystems?
- Unique, important fish/wildlife or their habitats?
- Visitor experience or aesthetic resources (i.e. Supply, Demand, Visitation Activities, etc.)?
- Socioeconomics, including employment, occupation, income changes, tax base and/or infrastructure?
- Energy resources?
- Gateway communities?
- Long term management of resources or land resources productivity?
- Pollution Prevention (greening of the parks)?
- Other important environmental resources (e.g., geothermal, paleontological, or night skies)?

YNP Comments/Conditions:

If any of the above exceptions apply, the project cannot be Categorically Excluded and an EA or an EIS is required.

IV. Special Status Species Checklist

Within the area of potential impact, are there any (If box checked, then YES):

- Species of special concern? (Federal or State)
Multiple species of special concern are present in Yosemite National Park; no impact anticipated.
- Proposed or listed threatened or endangered species? (Federal or State)
Multiple threatened or endangered species are present in Yosemite National Park; no impact anticipated.
- Park rare plants or vegetation?
Multiple park rare plants and vegetation are present in Yosemite National Park; no impact anticipated.
- Potential habitats for the special-status species listed above?
Multiple; no impact anticipated

Special Status Species Comments/Conditions:

Stock used in this project will be fed with certified weed-free feed. Limit project activity to previously disturbed areas. Limit vegetation disruption to that described in the proposal. Stage materials on previously disturbed surface.

Environmental Screening Form**V. National Historic Preservation Act Checklist**

Does the proposed project (If box checked, then YES):

- Entail ground disturbance?*

Backfilling, maintaining trail drainage structures, repairing damaged structures, rocking, and scaling

- Have any archeological or ethnographic sites within the area of potential effect?*

Maintenance is parkwide and may occur within archeological/ethnographic sites

- Entail alteration of a historic structure or a cultural landscape?*

Repairs will be made to trail segments and bridges that are historic structures.

- Has a National Register form been completed?*

This is a park-wide effort; includes many trails, bridges, & other structures that are listed or eligible for listing on National Register of Historic Places.

- Are there any structures on the List of Classified Structures in the area of potential effect?*

This is a park-wide effort; may include trails, bridges, & other structures on the List of Classified Structures.

*If yes, then a XXX must be completed

NHPA Comments/Conditions:

Consult with park cultural resource staff to identify which bridges are to be worked on and what is planned. Programmatic CE/XXX is modified to cover replacement of deck treads and handrails. Rebuilding structural items such as bridge abutments and stringer replacements has the potential to alter the structure and should be evaluated on a case-by-case basis in consultation with the cultural resource team to determine historic components of the structure and best approach for rehabilitation and repair. Implement "Preservation Planning Objective and Procedures" concerning archeological resources (attached to XXX). Trail crew leaders will attend refresher session with park archeologists at beginning of season to ensure protection of archeological resources.

VI. Wild and Scenic Rivers Act Checklist

Does the proposed project (If box checked, then YES):

- Fall within a wild and scenic river corridor? Merced and Tuolumne Rivers
 - Fall within the bed and banks AND will it effect the free-flow of the river?
- If Yes, WSRA Section 7 determination required**
- Have the possibility of affecting water quality of the area?
 - Remain consistent with its river segment classification (Wild, Scenic, or Recreational - MRP p. 39)?
Various
 - Protect and enhance ORVs (Scientific, Scenic, Geologic Processes/Conditions, Recreational, Biological, Cultural, Hydrologic Processes [i.e. Water Quality, Unique Wetlands]) on a segment-wide basis (refer to Fig. 2 in the MRP - p. 43)?
Recreational, cultural
 - Fall within the River Protection Overlay (MRP p. 99-101)?
 - Remain consistent with conditions of the River Protection Overlay (MRP p. 53)?
Any maintenance within RPO will support ORVs and minimize impacts to river.
 - Remain consistent with Management Zoning (MRP p. 99-101)?
Various
 - Fall on a tributary to a Wild and Scenic River?
 - Will the project invade (encroach or intrude upon) a Wild and Scenic River corridor?
 - Will the project unreasonably diminish scenic, recreational, or fish and wildlife values?

WSRA Comments/Conditions:

No impact to Wild and Scenic Rivers anticipated.

Environmental Screening Form

VII. NEPA Analysis And Approval Conditions

The project meets the terms and conditions of a categorical exclusion to NEPA.

Applicable Categorical Exclusion:

DO12 3.4.C.04 Routine maintenance and repairs to cultural resource sites, structures, facilities, utilities, grounds under an approved Historic Structures Preservation Guide or Cyclic Maintenance Guide (or equivalent guides); or if the action would not adversely affect the cultural resource.

Conditions:

- 1. Stock used in this project will be fed with certified weed-free feed.
2. Limit project activity to previously disturbed areas.
3. Limit vegetation disruption to that described in the proposal.
4. Stage materials on previously disturbed surfaces.
5. Consult with park cultural resource staff to identify which bridges are to be worked on and what is planned.
6. This Programmatic CE/XXX is modified to cover replacement of deck treads and handrails. However, rebuilding structural items such as bridge abutments and stringer replacements has the potential to alter the structure and must be evaluated on a case-by-case basis in consultation with the cultural resource team to determine historic components of the structure and best approach for rehabilitation and repair.
7. Implement "Preservation Planning Objective and Procedures" concerning archeological resources (attached to XXX).
8. Trail crew leaders will attend refresher session with park archeologists at beginning of season to ensure protection of archeological resources.

The following two conditions were added by CE 2005-090:

- 9. Historically used trail crew camps may be used after review and clearance by the park archeologist, including any archeological treatment necessary.
10. The establishment of any new trail crew camps at sites not historically used as such requires completion of a separate CE and NEPA/NHPA review process

This project has been reviewed in accordance with the above criteria and it has been determined that the project will result in no or minimal environmental effects. Therefore, it is Categorically Excluded from further environmental review required under the National Environmental Policy Act. Additionally, the necessary compliance coordination has been completed with regards to the National Historic Preservation Act, the Wild and Scenic Rivers Act and the Endangered Species Act.

Prepared by:

Ann Dolmage

With information from:

Tim Ludington

Compliance Specialist

Date

Compliance Program Manager

Date

Chief, Project Management

Date

See signatures on original ESF page 575, new page 777, next

VII. NEPA Analysis And Approval Conditions

Applicable Categorical Exclusion:

DO12 3.4.C.04 Routine maintenance and repairs to cultural resource sites, structures, facilities, utilities, grounds under an approved Historic Structures Preservation Guide or Cyclic Maintenance Guide (or equivalent guides); or if the action would not adversely affect the cultural resource.

Conditions:

Stock used in this project will be fed with certified weed-free feed. Limit project activity to previously disturbed areas. Limit vegetation disruption to that described in the proposal. Stage materials on previously disturbed surface. Consult with park cultural resource staff to identify which bridges are to be worked on and what is planned. Programmatic CE/XXX is modified to cover replacement of deck treads and handrails. Rebuilding structural items such as bridge abutments and stringer replacements has the potential to alter the structure and should be evaluated on a case-by-case basis in consultation with the cultural resource team to determine historic components of the structure and best approach for rehabilitation and repair. Implement "Preservation Planning Objective and Procedures" concerning archeological resources (attached to XXX). Trail crew leaders will attend refresher session with park archeologists at beginning of season to ensure protection of archeological resources.

This project has been reviewed in accordance with the above criteria and it has been determined that the project will result in no or minimal environmental effects. Therefore, it is Categorically Excluded from further environmental review required under the National Environmental Policy Act. Additionally, the necessary compliance coordination has been completed with regards to the National Historic Preservation Act, the Wild and Scenic Rivers Act and the Endangered Species Act.

Ann Dolmage 6-21-04
Compliance Specialist Date

Marni A. Bore 6/22/04
Compliance Program Manager Date

Prepared by:

Ann Dolmage

With information from:

Tim Ludington

Bill Delaney 6/28/04
Chief, Project Management Date

A. DESCRIPTION OF UNDERTAKING**Project Title:** Routine Trail Maintenance, 2004-2006**Project Manager:** Tim Ludington**Start Date:** 4/1/2004**Completion Date:** 12/31/2006**Location:** Parkwide**Description:**

This CE is designed to cover routine trail maintenance and repair activities that have no potential for measurable impact. Maintenance is necessary to ensure visitor safety and enjoyment, and to promote resource protection by encouraging trail use. Activities covered include: rebuilding damaged/deteriorated walls, trail tread, drainage structures, creek fords, bridge abutments, and other structural elements; rebuilding and repairing trail bridges including replacement of bridge stringers, decking and railings and repairs to bridge abutments; removing fallen trees and rocks from trail corridor; repairing sections where erosion has compromised trail integrity; {and maintenance and repair of asphalt paths and multi-use trails [language added by CE 2005-090]}. A list of specific activities and definitions is included with the PIF. This CE is not intended to cover extensive trail reroutes, bridge abutment relocation, archeological and wilderness clearance for trail crew campsites, helicopter support, or activities occurring at a great distance from the trail corridor.

June 9, 2004- The project discription is modified as follows, in accordance with recommendations from the park cultural resource staff: Replacement of deck treads and handrails due to wear, deterioration or nature are covered under this CE/XXX. Rebuilding structural items such as bridge abutments and stringer replacements will require case by case review by park cultural resource staff.

August 18, 2005: this Project Description is amended by ~~CE~~2005-090, as follows:

"It is the intention of CE 2004-057 to cover the use of historically used trail crew camps once archeological clearance is completed, according to the procedure outlined in the document "Preservation Planning Objectives and Procedures", attached, and stipulated as a condition of the Section 106 compliance (see project XXX). This CE does not apply to the establishment of trail crew camps at new locations not historically used. Establishing such new camps requires a separate CE and NEPA/NHPA review process."

Attachments:

Drawings Maps Specifications Photographs Site Plan

Other:

PRESERVATION ASSESSMENT FORM (YOSE-XXX)**3. The proposed action will (check as many as apply):**

- Destroy, remove, or alter features/elements from a historic structure
- Replace historic features/elements in kind
- Add nonhistoric features/elements to a historic structure
- Alter or remove features/elements of a historic setting or environment (including terrain)
- Add nonhistoric features/elements (including visual, audible, or atmospheric) to a historic setting or cultural landscape
- Disturb, destroy, or make archeological resources inaccessible, or alter terrain
- Disturb, destroy, or make ethnographic resources inaccessible, or alter terrain
- Potentially affect presently unidentified cultural resource
- Begin or contribute to deterioration of historic fabric, terrain, setting, landscape elements, or archeological or ethnographic resources
- Involve a real property transaction (exchange, sale, or lease of land or structures)
- Other:

4. Measures to prevent or minimize loss or impairment of historic/prehistoric fabric, setting, integrity or data:**5. Supporting Study Data (attach if feasible; if action is in a plan, give name and project or page number):****6. Additional Attachments (if needed):**

- Drawings Maps Photographs Site Plan Sample List of Materials
- Other:

Checklist Preparer**Date**

PRESERVATION ASSESSMENT FORM (YOSE-XXX)

C. SPECIALIST SECTION

SPECIALISTS: Your comments here (or attached) show that you have reviewed this proposal for conformity with requirements of Section 106, with the 1995 Servicewide PA (if applicable), and applicable parts of the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation, the NPS Management Policies, and the NPS Cultural Resource Management Guideline, and have given your best professional advice about this project and the issues relevant to the Section 106 process, including identification and evaluation of historic properties and further consultation needs.

Archeologist Name: Laura Kirn

Date: 6/1/04

Comments:

Ground Disturbance Not Involved?

Assessment of Effect: No adverse effect

Recommendations for conditions or stipulations: follow Preservation Planning objectives; take this doc. from draft to final before FY05.

Signature of Archeologist: Laura Kirn

Cultural Anthropologist Name:

Date:

Comments:

Assessment of Effect:

Recommendations for conditions or stipulations:

Signature of Cultural Anthropologist: _____

Curator Name: DAVE FORGANO

Date: 6/3/04

Comments:

Assessment of Effect: No adverse effect

Recommendations for conditions or stipulations:

Signature of Curator: David M. Forgan

PRESERVATION ASSESSMENT FORM (YOSE-XXX)

Historian

Name:

Date:

Comments:

Assessment of Effect:

Recommendations for conditions or stipulations:

Signature of Historian: _____

Historical Architect

Name:

PAUL CHATTEY

Date:

6-3-04

Comments:

Assessment of Effect:

No Adverse Effect

Recommendations for conditions or stipulations:

Note attached Email from Craig Struble

Signature of Historical Architect: _____

Paul Chattey

Historical Landscape Architect

Name:

Date:

Comments:

Assessment of Effect:

Recommendations for conditions or stipulations:

Signature of Historical Landscape Architect: _____

Preservation Specialist

Name:

CRAIG STRUBLE

Date:

6/3/04

Comments:

Assessment of Effect:

No Adverse Effect

Recommendations for conditions or stipulations:

See Attached e-mail regarding EXCLUSIONS

Signature of Preservation Specialist: _____

Craig S. Struble

PRESERVATION ASSESSMENT FORM (YOSE-XXX)**D. PARK 106 COORDINATOR REVIEW AND RECOMMENDATIONS**

1. Review by specialists: The appropriate subject-matter experts for reviewing the project are indicated in check-off boxes in the Specialist Section.

- The foregoing assessment is adequate: proposed action is consistent with all applicable NPS Management Policies, standards, guidelines, or USDI Standards/Guidelines, Rehabilitation of Historic Buildings or others and incorporates measures to avoid Adverse Effects.*

Reviewed and Accepted By:

Name: 

Date: 6-17-04

Title: Chief of Resources Division

2. Assessment of Effect: No Adverse Effect

3. Compliance Requirements The following is the park's assessment of Section 106 process needs and requirements for this undertaking

A. Standard 36 CFR Part 800 Consultation

Consultation under 36 CFR is needed subsequent to preparation and review by appropriate cultural resource management advisors of this form.

B. Undertaking related to 1995 NPS Programmatic Agreement

The above action meets all conditions for a programmatic exclusion under Stipulation IV of the 1995 NPS programmatic agreement.

Exclusion Number: IV B (6)

C. Plan-Related Undertaking

Consultation and review of the proposed undertaking were completed in the context of a plan review process, in accordance with the 1995 NPS programmatic agreement and 36 CFR Part 800.

D. Undertaking Related to Another Agreement

The proposed undertaking is covered for Section 106 purposes under a document such as a statewide agreement written in accordance with 36 CFR Park 800.7 or counterpart regulations.

Agreement:

E. Flood-Recovery Related Undertaking

The proposed undertaking is covered for Section 106 purposes under the letter-based agreement between the NPS, the State Historic Preservation Office and the Council for Historic Preservation for Highwater 97 flood repair and recovery.

F. Undertaking Related to 1999 Yosemite Programmatic Agreement

The proposed undertaking is covered for Section 106 purposes under the park's 1999 programmatic agreement for planning, design, construction, operations and maintenance; the undertaking meets the stipulations identified in Article VII.C.2.

Agreement:

4. Stipulations/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 mitigate potential adverse effects.

1. Consultation with park cultural resource staff to identify which bridges are to be worked on and what is planned.

2. Re-building structural items such as bridge abutments and stringer replacement has the potential to alter the structure and should be evaluated on a case by case basis in consultation with the park cultural resource team to determine historic components of the structure (bridge) and best approach for rehabilitation and repair.

~~**3. Implement the attached "Preservation Planning Objective and Procedures" concerning archaeological.**~~

PRESERVATION ASSESSMENT FORM (YOSE-XXX)

3. Implement the attached "Preseration Planning Objective and Procedures" concerning archaeological resources.

The following two conditions were added by CE 2005-090:

4. Historically used trail crew camps may be used after review and clearance by the park archeologist, including any archeological treatment necessary.

5. The establishment of any new trail crew camps at sites not historically used as such requires completion of a separate CE and NEPA/NHPA review process

PRESERVATION ASSESSMENT FORM (YOSE-XXX)

Recommended by Park Section 106 coordinator

Name: **Jeannette Simons**

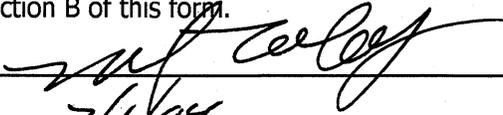
Title: **Historic Preservation Officer** 

Date: 6/22/04

Signature: 

E. SUPERINTENDENT'S APPROVAL

The proposed work conforms to NPS Management Policies and NPS-28 and I approve the recommendations, stipulations, or conditions noted in Section B of this form.

Signature of Superintendent: 

Date: 7/1/04



Craig Struble

06/08/2004 04:49 PM
PDT

To: Jeannette Simons/YOSE/NPS@NPS, Paul Chattey/YOSE/NPS@NPS,
Ann Dolmage/YOSE/NPS@NPS, Laura Kirn/YOSE/NPS@NPS
cc:
Subject: Routine Trail Maintenance

Jeannette,

One stipulation to the programmatic agreement for trails should include prior consultation to identify which bridges are to be worked on and what is planned. I think replacement of deck treads and handrails due to wear, deterioration or nature should be covered under the agreement. Re-building structural items such as bridge abutments and stringer replacement however has the potential to alter the structure and may need to be evaluated on a case by case basis. In the event of this type of work, the cultural resource team needs to be consulted to determine what components of the bridge are historic. For instance a bridge with historic abutments may need some research to determine if it would be appropriate to restore lost architectural components. Re-pointing of abutments with incompatible mortar is also concern, so some consultation for major repointing projects should receive some review.

Craig Struble
Heritage Structures
Preservation Program
Yosemite National Park
Office 209-379-1220
Fax 209-379-1266

*See XXX 2004-057 pg 496 ~~Historic~~
Preservation Specialist Blvd.
JP 6/9/04*

Routine Trail Maintenance 2004 - 2006

DO-12 Direction: "Each year, parks undertake a variety of routine actions and activities that are similar in nature. For example, trails are cleared in the spring, fences are repaired, potholes are filled. These activities should be reviewed in conjunction with the park's budgetary process. Normally, budgets for these activities are developed for a given fiscal year, money is appropriated, and the work gets done. Park staff should consult with each other, develop a list of activities that would most likely be accomplished in the fiscal year, or by season, and consider covering these activities, if they meet the criteria established for a CE, in one CE document." (DO-12, section 3-9).

Categorical Exclusion applied: 3.4 C (3) Routine maintenance and repairs to non-historic structures, facilities, utilities, grounds, and trails.

Project Description: This categorical exclusion is designed to cover routine trail maintenance and repair activities that have no potential for measurable impact. Routine trail maintenance is necessary to ensure adequate visitor safety and enjoyment, as well as promote resource protection by encouraging the majority of backcountry users to use the maintained trail corridor.

Routine trail maintenance activities covered by this categorical exclusion include activities such as: re-building damaged or deteriorated walls, trail tread, drainage structures, creek fords, bridge abutments and other structural elements; rebuilding and repairing trail bridges including replacement of bridge stringers, decking and railings and repairs to bridge abutments; removing fallen trees and rocks from the trail corridor; and repairing sections where erosion has compromised trail integrity. A more complete list of trail maintenance activities with descriptive definitions is included at the end of this document.

This categorical exclusion is not intended to cover activities such as extensive trail reroutes, bridge abutment relocation, archeological and wilderness clearance for trail crew campsites, helicopter support, or activities occurring at a great distance from the trail corridor.

Required Mitigation Measures:

- Trail crew leaders will attend a refresher session with park archeologists regarding the protection of archeological resources at the beginning of the season
- Backcountry crew camps will be surveyed prior to occupancy by archeology and wilderness representatives to avoid resource impacts to the greatest extent possible

This categorical exclusion covers activities scheduled to take place in 2004 thru 2006

The following is an alphabetized list of definitions of routine maintenance activities covered by this categorical exclusion.

Backfilling: This is done with shovels, picks and rakes. This activity involves maintaining the integrity of the trail tread by relocating material that has deposited on the inside of the trail to the outside of the trail. It also includes relocating displaced soils (berm) from the outside of the trail to the middle of the trail tread.

Bridge Repairs and Rehabilitations: This is work of a recurring nature. Work ranges from minor repairs to individual pieces or sections of decking and railing to complete replacement of stringers, decking and railing. This work also includes repairs to log and masonry bridge abutments, including repairing footings.

Brushing: Cutting back brush and small trees that encroach on, and block the trail. This task is accomplished using lopping shears, handsaws, bow saws, chainsaws, pulaskis and pics.

The width of the vegetation removal varies considerably, depending on elevation, aspect, vegetation type, and other factors. On brushy south facing slopes where annual growth can be in excess of three feet per year the trail is cleared wider. In higher alpine areas where growth is slow, a narrower corridor is brushed. Typically, the standard applied is approximately 3 feet from the edge of the trail. The cuts are made to the ground or to nearest fork in a branch. All cuts are made cleanly, avoiding any shredding or tearing. Tree branches are cut flush with the trunk. Trees, with the potential to encroach upon the trail corridor, are removed. Young trees are also removed to preserve the integrity of the trail corridor. Stumps are flush cut. Slash is stashed out of sight whenever possible for aesthetic reasons. It may also be used to block short cuts.

Limbing: A limbing saw is used to cut low hanging branches that intrude into the trail corridor. The standard is generally to cut anything that hangs down to within about ten to twelve feet of the ground. Cuts are made cleanly and flush with the trunk. Slash is stashed out of sight of the trail whenever possible for aesthetic reasons. It may also be used to block short cuts.

Logging: All trees that interfere with the trail corridor are considered for removal. This includes downed trees, leaners, and trees that will interfere with the integrity of the trail corridor within the next many years.

Down trees are cut to a width which allows enough space for the user group of any given trail segment to pass easily and safely. Cut rounds are rolled off the trail on the downhill side.

Maintaining/Cleaning Trail Drainage Structures: Shovels, picks, rock bars and sledgehammers are used to restore or establish trail drainage structures to proper depth and shape for optimum performance. Maintaining drainage structures and digging new ones is performed on the trail tread and the immediately adjacent uphill and down hill slopes.

In some cases, off-trail drainages have been established to help keep the flow of water within the drainage structures. Maintenance of these structures is limited to digging out accumulated dirt, rock and organic material, within the confines of the previously impacted area. In some instances, new off-trail drainages are established. These are established when the alternative would be a trail reroute, with new impacts to a previously undisturbed area.

All employees are made aware that all artifacts are protected by law, and if any suspicious soil layers are found, digging must stop at once and the supervisor or leader informed. Care is used to avoid damage to any *known* threatened or endangered plants

Repairing Damaged Trail Structures: Repairs are made to damaged, non-functioning, trail structures.

Shovels, rock bars, single jacks, double jacks and a variety of rigging gear are used. The materials used for these repairs are: 1) Rocks that are loose and within the trail corridor; 2) nearby rocks lying atop the ground; and 3) partially buried nearby rocks. Choices #2 and #3 include subsequent and immediate restoration of the area from which the rock is removed.

Pack and draft stock are used to move the materials to the site of the repairs. Rigging is also used for this purpose. Rocks and trees are used to provide anchors for rigging. Occasionally, a hole is drilled in rock to support an anchor. As discreet a location as possible is chosen for this.

The remainder of the work is performed within the previously disturbed area of the trail corridor.

All employees are made aware that all artifacts are protected by law and that if any suspicious soil layers are found digging must stop at once and the supervisor or leader informed. Care is used to avoid damage to any *known* threatened or endangered plants.

Rocking: Using rakes and shovels to remove loose unstable rock and branches from the trail tread. Rocks are not pulled out of the tread. Rocking is done primarily where the loose rocks present a hazard or are likely to impede the free flow of water at drainage structures. These materials are disposed of by either being scattered out onto the slope below; or used in trail repair, short-cut blocking, back filling, or some combination of these. On some trail segments it is necessary to construct inside retaining walls as catch basins for storing/stabilizing this material.

Safety Railing repairs and replacement: This work involves the repair of existing safety railings at a variety of front country and wilderness locations. This work sometimes includes the drilling of new holes in rock to support replacement sections of railing.

Scaling: Scaling involves the light use of a rake or shovel on the uphill side of the trail to bring down loose rocks and branches that are likely to wash, roll or fall down onto the trail within the following year. These materials are removed so they will not end up impeding the function of drainage structures or become obstacles to trail users. These

materials are disposed of by being moved onto the slope below; or used in trail repair, short-cut blocking, back filling, or some combination of these. On some trail segments it is necessary to construct inside retaining walls as catch basins for storing/stabilizing this material.

YOSEMITE TRAILS PROGRAM: PRESERVATION PLANNING GUIDELINES

Central to the National Park Service's mission statement is the goal to preserve and protect our cultural heritage that is reflected in our cultural resources. America's cultural resources—buildings, landscapes, archeological sites, traditional use resources, objects and documents, structures and districts—embody a rich heritage of human experiences and cultural identities.

The step by step procedures presented below are designed to meet the NPS' responsibilities under Section 106 of the National Historic Preservation Act (NHPA) for cultural resources (also called historic properties) that may be affected by the park's Trails Program. These procedures form guidelines supplementing the park's 1999 Programmatic Agreement for Section 106 compliance. Implementing regulations noted below are those published in _____, as stipulated in the Programmatic Agreement.

These guidelines are intended for use by Trails Program staff and Cultural Resource specialists. They present roles, responsibilities, and collaborative methods by which the park's preservation objectives are achieved.

Step 1: Determine which elements of the annual trails workplan are subject to further review under the NHPA.

The annual trails program is considered an undertaking under the Section 106 process.

Undertaking means any project, activity, or program that can result in changes in the character or use of historic properties, if any such historic properties are located in the Area of Potential Effects (APE, cf. 36 CFR 800.2(o)).

The APE is defined in 36 CFR Part 800.2 (c) as "the geographic area or areas within which an undertaking may cause changes in the character or use of historic properties, if any such properties exist.

Activities under the purview of the trails program that are elements of the undertaking, requiring further review and consideration under NHPA, include but are not limited to the following:

- Routine repair and maintenance of historic trails listed or determined eligible for the National Register of Historic Places. At present, the following trails are designated as historic trails (this list will be updated as new information becomes available):

Four Mile Trail	Mist Trail
Half Dome Trail	John Muir Trail
Pohono Trail	Yosemite Falls Trail
High Sierra Camps Loop Trail	
- trail reconstruction or major rehabilitation,
- trail realigning or rerouting,
- repairing or rebuilding trail bridges
- establishing new and using existing trail crew camps, and
- excavating soils or rock for trails program activities.

All or portions of an annual workplan constitute an undertaking, therefore for each annual workplan we will proceed to Step 2 below:

Step 2: Determine the APE.

Wilderness trail camps and associated facilities, as illustrated above, constitute one APE. Other APEs include any work along historic trail segments, areas along the trail corridor where ground disturbing trail work actions occur outside of the trail prism, and areas of major trail rehabilitation, reconstruction, or realignment. For purposes of determining the APE of the annual workplan, the following definitions and descriptions apply:

Trail Prism:

Maintenance & Preservation maintenance:

Rehabilitation:

New construction:

The APE will be determined by the following process:

- a) Prior to March 1 of each year, the Trails Program Supervisor will provide an annual workplan to the Chief of Cultural Resources. This annual workplan will include 7.5 minute topographic maps with work areas plotted, and descriptive text for each activity documenting the following:
 - a. Work camps to be used
 - b. Trail segments to be repaired, maintained or rehabilitated
 - c. New trail segments to be constructed
 - d. any borrow areas
 - e. Photographs of existing condition to be repaired or maintained, if available
- b) The Cultural Resources specialists will analyze this information and establish the APE appropriate for each type of historic property

Once the APE has been established, proceed to Step 3.

Step 3: Identify information needs.

Determine what information already exists, and what new information is necessary to adequately avoid adverse effects in the APE:

- a) The archeologist will conduct background research to determine whether the APE has been inventoried for archeological and traditional use resources, and whether known resources have been adequately documented
- b) The historic landscape architect will conduct background research to determine if the APE encompasses any previously identified cultural landscape, historic structure or historic site, and whether known resources have been adequately documented
- c) The Park Native American Liaison will consult with Park-associated American Indian tribes and groups to determine whether there are resources of traditional or cultural tribal significance within the APE, and whether known resources have been adequately documented. Information provided to the tribes will include results of background research. This consultation will include a discussion of proposed inventory methods (e.g. archeological survey).

If background research indicates the APE has not been inventoried for potential historic properties, or if known historic properties have not been adequately documented, proceed to Step 4. Otherwise, proceed to Step 5.

Step 4: Conduct further inventory work in APE

If existing information is not sufficient to determine whether historic properties are present, or what treatment measures are necessary, further inventory work will be necessary:

- a) Staff of the Archeology Office will conduct archeological inventory in areas of the APE that lack reliable information on archeological resources. Resources that are discovered will be documented using the standards established by the Yosemite Archeology Office that meet both the State of California and the NPS requirements for documentation. Diagnostic artifacts (such as projectile points) in the APE that are at risk of being displaced, damaged, or looted will be collected. Any collected items will be analyzed consistent with the recommendations of the Yosemite Archeological Research Design, and will be cataloged and accessioned into the Yosemite Museum.
- b) The historical landscape architect will conduct inventory and evaluation work in areas of the APE that lack reliable information on potential cultural landscapes, historic structures or historic sites. New resources will be documented to NPS and Secretary of the Interior's Standards.
- c) If consultation with American Indians indicates a potential for traditional cultural properties, further Native American consultation and traditional cultural resource inventory and evaluation will be conducted by the Park Anthropologist, in consultation with affiliated Native American tribes.

Step 5: Avoiding adverse effects: Exchange information and promote collaboration to ensure protection of historic properties

This program of cultural resources stewardship through the Trails program requires good communication and collaboration between Trails Program Supervisors, Work Leaders, the Historical Architect, and Archeologists. To achieve this, the following measures will be employed:

- a) Cultural resource specialists will provide an Annual Refresher as training for Trails staff. The purpose of this training is to orient trail crew staff and supervisors to cultural resources of the park (and especially those specific to trail work), and measures to avoid adverse effects
- b) The Chief of Cultural Resources will provide information to the Trails Program Supervisor and on-the-ground Work Leaders regarding the nature and location of historic properties in all areas of the annual workplan. This information-sharing will include specific measures to ensure confidentiality of sensitive information.

- c) If preservation maintenance or rehabilitation is necessary for a historic trail, trail segment or bridge, the Historical Architect, in consultation with the Trails Program Supervisor, will establish treatment plan for retaining the trail's historical significance while facilitating the necessary maintenance or repair.
- d) The Trails Program Supervisor, in consultation with cultural resource specialists, will establish measures to protect any other identified cultural resources within the annual workplan APE.

Step 6: If adverse effects to any historic property are unavoidable, initiate consultation as outlined in the PA

If the Trails Program Supervisor, Archeologist, and/or Historical Architect, in consultation with the Park Historic Preservation Officer, determine that adverse effects to historic properties are unavoidable, the specific trails work will be documented as a separate undertaking. The park will initiate consultation to resolve adverse effects.

Examples of work elements that may result in adverse effects:

- Rehabilitation of a historic trail or trail segment that does not follow the Secretary of Interior's Standards for Treatment of Historic Properties or Directors Order No. 28 regarding treatment of historic properties
- Reconstruction of a historic trail bridge using non-historic design and materials
- Continued use of a significant archeological site as a crew camp location
- Routing a new trail segment through an archeological site
- Rehabilitation of or routing a new trail segment through an cultural landscape
- Use of a portion of a cultural landscape as a crew camp location

Step 7: Providing for discovery of new cultural resources

It is possible that previously unknown cultural resources will be discovered during the course of trail work. The annual refresher identified in Step 5 above will provide trail crew staff and supervisors with enough information to be able to identify new discoveries and initiate procedures to protect these resources. The following procedures will be followed when necessary:

- a) **Monitoring:** In some work areas without documented surface archeological resources, archeologists may ascertain a high potential for buried resources. An example of this is an area adjacent to a known archeological site covered by a recent alluvial fan. In these situations, and on a case by case basis, the Park Archeologist may require a monitor to be present during ground-disturbing activities.
- b) **Inadvertent discovery:** In the event that previously unknown archeological or historic resources are discovered during the course of trail work, the work leader or on site supervisor will stop work in the immediate vicinity of the discovery until the resource can be further assessed and the find communicated to the appropriate cultural resource specialist. The cultural resource specialist and trail crew supervisor will revisit Steps 5 (and 6, if necessary) to address the discovery.

Step 8: Report inventory, evaluation, and treatment

All results of cultural resources inventory, evaluation and treatment will be documented in an annual report(s) that meets NPS standards. Report(s) shall be filed in the park archives and research library, and disseminated to NPS offices, the State Historic Preservation Officer, Indian tribes and the public (subject to confidentiality restrictions).

Is this adequately incorporated?

Jeannette,

One stipulation to the programmatic agreement for trails should include prior consultation to identify which bridges are to be worked on and what is planned. I think replacement of deck treads and handrails due to wear, deterioration or nature should be covered under the agreement. Re-building structural items such as bridge abutments and stringer replacement however has the potential to alter the structure and may need to be evaluated on a case by case basis. In the event of this type of work, the cultural resource team needs to be consulted to determine what components of the bridge are historic. For instance a bridge with historic abutments may need some research to determine if it would be appropriate to restore lost architectural components. Re-pointing of abutments with incompatible mortar is also concern, so some consultation for major repointing projects should receive some review.

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Appendix A

Since establishing and using trail camps poses a significant potential for impacts to archeological resources, the Archeology Office has instituted a program of identifying and inventorying all 'traditionally used' camp areas for archeological concerns. Information generated from this will assist Trail Supervisors in planning annual fieldwork and programming for any necessary site treatment (such as data recovery excavations).

This program consists of the following:

- a) Complete the GIS theme for Trail Camp locations as information becomes available.
- b) Inventory camp locations and document archeological resources in camp vicinity; include alternative camp locations in this inventory, in the event camp can be moved to avoid archeological resources
- c) Should an archeological site exist in the vicinity of a camp, map the camp facilities in relation to the archeological site so that future camp set-ups may avoid impacts to the site (this could include minimal subsurface survey to confirm site boundaries)
- d) If a camp has traditionally been established on top of a site, and there are no feasible alternatives for site avoidance, initiate archeological test excavations to determine the site's nature and significance, and whether continuing its use as a crew camp would adversely affect the important site characteristics.
- e) Monitor ground disturbance during camp set-ups, in situations that have the potential for uncovering previously unknown archeological resources.
- f) The park's Architecture program has identified certain cultural landscapes and will continue identifying and documenting these resources. If establishing and using wilderness trail camps may affect a cultural landscape, further inventory and documentation will be undertaken.

All camp inventory, and ground disturbance monitoring activities would be reported as part of the annual report of activities. Any archeological testing at sites used for crew camps would be a separate project requiring, at minimum:

- a) Initial consultation with park-associated Indian tribes
- b) Preparation of a site-specific research design identifying archeological objectives, field methods, lab and analytical methods, and reporting requirements
- c) Logistical support from the Trails program to transport field equipment to work site

Appendix B

1. Archeologists and the Historical Architect will conduct an annual workshop for Trails supervisors and work leaders to provide education and training on the process for identifying, documenting and treating historic properties within the Trails program. This workshop will address:
 - the types of historic properties found in trail work areas and best methods of treating these,
 - the value such resources play in our society and with Native people,
 - cultural landscapes and historic structures,
 - the inventory and documentation process followed by the archeologists, and the annual reporting requirements
 - the mission of the NPS to protect such resources
 - the employees role in preserving cultural resources
 - confidentiality protocols (for handling sensitive information),
 - the steps to take in the event of an inadvertent discovery.