



CATEGORICAL EXCLUSION DOCUMENTATION FORM (CE FORM) AND DECISION RECORD

Title: Reducing Wildfire Risk and Restoring Public Access in Storm-Damaged Areas

Secondary Title: Helene – large scale fuel reduction beyond road corridor

PEPC Project Number: 132622

Project Locations:

Location

Counties:	Avery, Buncombe, Burke, McDowell, Mitchell, Watauga	State:	North Carolina
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BACKGROUND

Hurricane Helene passed through western North Carolina on September 27, 2024, with sustained winds of 80 mph at Mt. Mitchell adjacent to the Blue Ridge Parkway (“Parkway”) and record-breaking rainfall in the Parkway corridor of 14–30 inches. As a result of the storm, the Parkway sustained significant damage and, in some cases, complete devastation of the motor road, overlooks, slopes, structures, vegetation, developed areas, and other resources.

There are areas within Parkway boundaries where significant dead and downed vegetation accumulated into large, concentrated debris masses. These materials, commonly referred to as “fuels” for the purposes of wildland fire management, have increased substantially compared to prehurricane levels. The dramatic increase in surface fuels combined with ongoing severe drought conditions in the region has heightened the risk of damaging wildfires in some areas that are adjacent to communities and private homes. Concentrated piles of debris / blowdown could also impact the ability of firefighters to safely and effectively control fires in the area. Additionally, storm damage in some cases interferes with access to Parkway lands, trails, structures, and boundaries.

The National Park Service (NPS) will be implementing a hazardous fuel reduction project in specific areas to reduce wildfire risk and address public safety, while also restoring upland and maintaining protection of natural and cultural resources along the Parkway. Parkway leadership and the Resource Management Divisions with help from the NPS Washington Support Office

and consultants have conducted wildfire-risk modeling and field verification of areas with extensive blowdown in order to evaluate debris depositions that may pose a significant risk to life and property. This proposed action will reduce post-Helene dead and downed vegetation that has collected in a volume and location that:

- Presents an elevated risk of wildfire to communities, homes, and other resources
- Interferes with access to Parkway lands, trails, structures, and boundaries.

PURPOSE AND NEED

The purpose of the project is to remove concentrations of Hurricane Helene-generated vegetative debris where those accumulations substantially increase the risk of high-severity wildfire and create unsafe conditions for access necessary to implement restoration activities and to protect life and property. Following Hurricane Helene, widespread tree mortality and debris accumulation created dense fuel loads in multiple segments of the Parkway. Reducing wildfire hazard through the reduction of storm-generated hazardous fuels is necessary to lower overall wildfire risk and to protect life and property.

DESCRIPTION OF ACTION (PROJECT DESCRIPTION)

The proposed action focuses on removing or treating concentrated storm-generated debris where necessary to reduce wildfire risk associated with those debris accumulations. The National Park Service will be implementing hazardous fuel debris reduction projects in defined areas to reduce the risk of damaging wildfire along the Parkway.

Potential hazardous fuel reduction sites were initially identified using wildland fire risk modeling. Treatment areas were confirmed by field verification identifying locations where storm-generated debris concentrations create elevated wildfire risk to human life and property. Field verification substantially refined the preliminary treatment areas developed through wildfire risk modeling. During field review, treatment boundaries were modified to avoid sensitive natural and cultural resources, eliminate areas where debris concentrations no longer warranted treatment, eliminate areas where terrain prevented equipment access, reduce reliance on ground-based equipment where practicable, and retain isolated blowdown areas where treatment was not necessary to accomplish project objectives. As a result, the proposed action represents a resource-informed and narrowly targeted implementation footprint compared to preliminary planning concepts.

Project implementation will primarily involve the mechanical and manual removal of selected downed, damaged, and hazardous vegetation to reduce storm-generated fuel loading that could impede ecological recovery and increase wildfire risk. Treatment methods may include the selective removal or bucking of downed and damaged trees and the removal, chipping, scattering, or other treatment of smaller woody material. Temporary access routes, staging areas, and work zones will be sited and managed to avoid or minimize impacts on sensitive cultural and natural resources to the greatest extent practicable. Project design was refined during planning to avoid, minimize, and mitigate adverse effects on sensitive natural and cultural resources, as well as historic landscapes, recreational users, and parkway neighbors. Contracts

and agreements may be used to support fuel reduction activities, site stabilization, revegetation, and restoration efforts. No full roadway closures are planned for this project.

Targeted hazardous fuel reduction will occur at select sites that were identified by expert analysis as being at an elevated risk within the following corridors:

- Boone, approximately 72 acres between milepost 280 and 300
- Linville Falls, approximately 77 acres between milepost 310 and 319
- Little Switzerland, approximately 110 acres between milepost 324 and 341
- Asheville, approximately 636 acres between milepost 374 and 396.

Approximately 438 acres will have hazardous fuel reduction using ground-based extraction methods (see “Debris Removal and Hazardous Fuel Reduction” below). The acreage represents the planning area available for operations rather than the anticipated disturbance footprint. Ground-disturbing activities would occur only where necessary to access and remove or treat downed material. Areas within the 438-acre planning envelope that are not needed for these activities would remain undisturbed.

For parcels lacking direct access from existing roads, the proposed action includes a temporary access component to reach isolated treatment areas. Up to 30 acres have been identified as a siting envelope for access routes across all subunits. This acreage reflects the area within which temporary access could be located and does not represent the area of actual disturbance. The actual disturbance footprint would be limited to the portions of that envelope needed for temporary roads, equipment ingress/egress, and associated operational features and would be substantially smaller than 30 acres. Site-specific route selection would occur prior to implementation and would be designed to minimize the extent of new disturbance and avoid or reduce impacts to sensitive resources.

Approximately 428 acres will have hazardous fuel reduction and debris removal using aerial-based extraction methods (see “Debris Removal and Hazardous Fuel Reduction” below). The acreage represents the planning area available for operations rather than the anticipated disturbance footprint. Ground-disturbing activities would occur only where necessary to access and remove or treat downed material. Areas within the 428-acre planning envelope that are not needed for these activities would remain undisturbed.

Preliminary treatment areas are subject to further refinement based on ongoing evaluation of operational and resource considerations.

Preparation and Resource Protection Measures

Prior to implementation, the National Park Service will conduct preconstruction surveys and resource-protection measures, as practicable, to identify sensitive natural and cultural resources within and adjacent to treatment areas. Information obtained through these efforts will be incorporated into project planning and implementation to avoid, minimize, or mitigate adverse effects on sensitive natural and cultural resources within the project area of the Blue Ridge Parkway.

All treatment units will be surveyed for cultural resources using methods appropriate to the anticipated level of ground disturbance and resource sensitivity, which may include pedestrian survey, surface reconnaissance, subsurface testing, and monitoring during implementation.

Botanical surveys for small whorled pogonia, a federally listed plant, will be conducted in suitable habitat areas prior to ground disturbance. Survey timing will follow appropriate seasonal windows to ensure detectability. Identified occurrences will be flagged and designated as avoidance areas.

Biologists will conduct advance walkdowns in parcels where ground-based mechanical extraction will occur, to identify active migratory bird nests, flag trees, and suggest micro-avoidance polygons with recommended buffers (10 feet for all active migratory bird nests except bald eagles; 660 feet for any observed bald eagle nest or suspected eagle nesting activity).

Each treatment unit will be clearly delineated in the field using a combination of tree paint, flagging, and/or georeferenced survey data. Field marking and mapping will identify “do not disturb” features, including but not limited to:

- Existing trails, roads, and structures
- Water features, wetlands, and wetland buffers
- Known occurrences of species protected under the Endangered Species Act, such as documented small whorled pogonia patches, as well as known occurrences of rare plant species
- Known locations of migratory bird nests
- Observed bald eagle nests or suspected bald eagle nesting activity
- Isolated, small pockets of blowdown surrounded by otherwise healthy forest that are designated to be retained and not treated
- Known cultural resources.

All avoidance areas will be communicated to project personnel prior to the start of work and will be maintained throughout project implementation. These preparation measures are intended to minimize inadvertent impacts to sensitive resources, ensure compliance with applicable regulations, and support effective environmental protection during hazardous fuel reduction operations.

During ground-disturbing and tree removal activities associated with construction of access routes, debris removal, and hazardous fuel reduction activities described below, a qualified natural resource specialist will monitor ground-disturbing and tree removal activities, as appropriate; document previously unidentified sensitive resources (e.g., bats, migratory birds, wetlands) encountered during activities; and collect data to support project tracking and reporting for consultation with the US Fish and Wildlife Service (USFWS). A qualified cultural resource specialist will also monitor ground-disturbing activities, as appropriate; document previously unidentified resource encountered during implantation; and ensure compliance with

inadvertent discovery procedures and consultation requirements under Section 106 of the National Historic Preservation Act.

Access System

Temporary access is an integral component of implementing storm-generated debris removal and will be limited to the minimum extent necessary to accomplish authorized restoration activities. Temporary access roads will be constructed only where existing roads, previously disturbed corridors, or other access methods are insufficient to safely reach treatment areas. Access routes would be limited to the minimum length and width necessary to accomplish project objectives. Removal of standing trees to establish access would occur only when no practicable alternative exists. The temporary access road will be used solely for the duration of hazardous fuel reduction activities. Construction of temporary access roads would not exceed a ratio of 2.25 miles per 1,000 acres of harvest area, as needed.

Construction of the temporary access roads will involve clearing and grading a narrow travel surface sufficient to support tracked and wheeled heavy equipment, such as feller-bunchers and haul trucks. Crushed stone and sediment material may be imported and placed as needed to stabilize the road surface, improve load-bearing capacity, and minimize rutting and soil disturbance. Temporary culverts may be installed. Materials will be sourced from approved locations and transported to the site using existing park roads.

Access routes would be planned to avoid potential waters of the US to the extent practicable; however, temporary stream or wetland crossings may be required to facilitate access for hurricane fuel reduction operations. Existing crossings and previously disturbed locations would be used whenever practicable before constructing new crossings. New crossings would be installed only where necessary to access treatment areas and would be designed to minimize disturbance to stream channels, banks, wetlands, and adjacent riparian areas. The preferred crossing method would be temporary timber mats or other portable bridging systems that distribute equipment weight and reduce direct contact with streambeds or wetland soils. Where feasible, temporary spanning structures would be used to completely span the active channel and be placed outside the ordinary high-water mark to avoid disturbance to bed and bank features. In locations where spanning structures or timber mats are not practicable, temporary culverted crossings may be installed. Culverts would be appropriately sized based on drainage characteristics and installed following best management practices to prevent sedimentation and downstream impacts. Erosion/sedimentation barriers would be used to reduce erosion into drainages and wetlands.

Stream crossings would be removed and restored following completion of project activities. Temporary access roads would be removed and restored following completion of project activities unless resource managers determine that retention is necessary for future management purposes and appropriate environmental compliance has been completed. Access roads left in place would not exceed 1 mile in total length per 1,000 acres of harvest area. Restoration associated with temporary access roads constructed for salvage harvest activities will include removal of imported materials for temporary roads and culverts, regrading disturbed areas where necessary, stabilization of exposed soils, and revegetation with approved cover crops and native species or seed mixes.

Debris Removal and Hazardous Fuel Reduction

Hazardous fuel reduction will be implemented using a combination of mechanized equipment, helicopters, and hand crews. Salvage of merchantable material may occur when consistent with hazardous fuel reduction objectives. Heavy equipment will be mobilized to the project area using approved access routes and temporary access roads, as described elsewhere in the proposed action.

- **Ground-based mechanized extraction.** In areas where terrain, slope, and ground conditions allow safe operation of mechanized equipment, the National Park Service would use wheeled or tracked logging equipment to reduce hazardous fuels and conduct removal of merchantable storm-generated material incidental to debris removal. Activities may include cutting, limbing, and bucking of trees into transportable lengths; yarding, skidding, or forwarding of logs and woody material to designated landings or collection areas; piling or staging of slash, limbs, and other vegetative debris for subsequent treatment or disposal; and loading and transporting woody biomass material using wheeled or tracked logging equipment. Merchantable downed trees will be salvaged where feasible. Mechanized equipment used for these activities may include feller-bunchers, harvesters, skidders, forwarders, loaders, excavators, bulldozers, log trucks, and other equipment commonly used for wildland fire fuel reduction operations. Mechanized equipment would be used only where terrain, soil conditions, and resource protection requirements allow safe operation without causing unacceptable resource damage.
- **Helicopter-based extraction.** In areas where terrain, slope, lack of ground access, resource protection considerations, or other site conditions limit the safe or practicable use of ground-based mechanized or cable-assisted equipment, the National Park Service may use helicopter-assisted yarding (lifting woody biomass material out with a helicopter) to remove downed timber and hazardous woody material. Helicopter operations would involve lifting logs or other material from designated pickup locations within treatment areas and transporting the material by air to existing roads, landings, or other approved staging areas for processing, loading, or removal. Hand crews using chainsaws would cut and process downed trees as well as standing trees necessary to provide safe helicopter access; their work would include felling, limbing, topping, and bucking stems into lengths suitable for safe helicopter transport and subsequent removal. In areas where terrain and site conditions allow, tethered ground-based equipment could also be used to assist with felling, processing, or positioning material for aerial extraction. Crews may use ATVs on existing roads or other authorized access routes to reach work areas and transport personnel, tools, fuel, and supplies. No new temporary access roads would be constructed for helicopter operations. Flight paths, staging areas, and operational procedures would be planned to minimize disturbance to visitors, wildlife, and sensitive resources. ATVs may be used to provide access to locations, but no new temporary access roads would be developed.

Merchantable and non-merchantable woody material, including boles, trunks, tops, limbs, broken stems, and other slash, will be treated. Material may be cut and removed or cut, chipped, scattered, and/or piled when retained onsite. The project allows for specific quantities of

dispersed fine and large-diameter fuels that do not substantially contribute to fuel continuity or ladder fuel concerns to be left as exceptions within the site. These remaining materials will be retained on all sites to some degree and may be increased where removal would result in disturbance to patches of largely intact stands of forest or when it would exceed mitigation requirements to protect resources. These remaining woody materials will assist with erosion control and nutrient cycling and contribute to habitat.

Debris removal will be limited to the extent necessary to reduce wildfire hazards created by concentrated storm-generated fuels. Selected dead wood and coarse and fine woody debris would be retained where consistent with fuel reduction objectives to support nutrient cycling, soil development, wildlife habitat, and other ecological functions. Retained material would generally be placed in contact with the ground and distributed in a manner that minimizes hazardous fuel continuity and limits ladder fuels. Slash and chips may be removed where necessary to reduce fuel loading but will otherwise be retained on-site for nutrient recycling, where consistent with fuel management objectives.

Prescribed fire (e.g., jackpot burning, pile burning, underburning) is not a proposed activity under this project.

Restoration of Sites Post-Hazardous Fuel Reduction

Following completion of mechanical operations, areas of heavy soil disturbance would be restored as necessary to stabilize soils, reduce erosion potential, and facilitate revegetation. Restoration measures may include:

- Installation and maintenance of erosion- and sediment-control measures until disturbed areas are stabilized
- Regrading disturbed areas to approximate original contours
- Soil decompaction to a depth of approximately 4 inches using equipment blades or other appropriate methods
- Seeding disturbed soils with approved native seed mixes; in some cases, a non-native, non-persistent fast-growing species (e.g., annual rye grass) may be temporarily used to stabilize soils
- Planting native species where deemed necessary by Parkway staff
- Placement of rolled erosion-control blankets, mulch, or slash or erosion-control materials over disturbed areas, where appropriate, to reduce soil erosion and promote site recovery
- Passive restoration that allows reforestation through natural forest succession.

Restoration of temporary access roads and stream crossings is addressed above under “Access System.” Staging areas and other temporary facilities would be removed and restored following completion of project activities unless resource managers determine that retention is necessary for future management purposes and appropriate environmental compliance has been completed. Restoration will include removal of imported materials for temporary roads and

culverts, staging areas, and decking areas; soil decompaction; regrading disturbed areas where necessary; stabilization of exposed soils; and revegetation with approved native species or seed mixes.

Equipment operations will avoid wetlands, seeps, springs, riparian areas, and saturated soils to the maximum extent practicable. Hazardous fuel reduction activities would not occur within 50 feet of visible streams and wetlands unless specifically approved by the National Park Service (e.g., if temporary stream or wetland crossings are necessary to facilitate equipment access for hurricane fuel reduction operations, as noted above). Operations may be temporarily suspended during excessively wet conditions when continued use could result in excessive rutting, soil compaction, or resource damage. If inadvertent impacts occur, affected areas would be stabilized and restored as soon as practicable using methods appropriate to site conditions and resource objectives. These restoration measures are intended to return disturbed areas as closely as practicable to predisturbance ecological function while allowing natural recovery processes to continue.

In addition to the restoration measures associated with hazardous fuel reduction activities described above, the National Park Service will undertake broader ecological restoration and invasive plant management activities to support recovery of areas affected by Hurricane Helene. Restoration efforts may include active revegetation and other measures to augment natural recovery, stabilize impacted areas, and support restoration of native plant communities. Invasive plant management activities will include invasive species surveys and active treatment of invasive plants where needed. Such activities will be evaluated and implemented under separate environmental compliance, as appropriate.

MITIGATION

Resources (General)

- Contractors will use existing NPS roadways, shoulders, and pull-offs for staging and access whenever possible.
- Contractors may not enter any exclusion or off-limits areas as indicated on a map, marked with flagging, or described in specifications.
- All contractor staff would avoid damage to the other natural and cultural resources in the park. Contractor access to the worksites will minimize soil disturbance and trampling or breakage of vegetation, streambanks, springs, or any other park resources.

Cultural Resources

- All known cultural resources will be geofenced and the boundaries flagged/painted out prior to the initiation of any ground-disturbing activities. No mechanical equipment or ground disturbance will occur within these identified boundaries.
- NPS-approved Cultural Resource Monitors will be present during all ground-disturbing activities in Removal-First Areas to document conditions, ensure compliance with avoidance measures, and identify any previously unrecorded resources.

- If historic properties are inadvertently encountered during this undertaking, the Parkway Superintendent will notify the State Historic Preservation Officer (SHPO)/ Tribal Historic Preservation Officer (THPO) and federally recognized Indian Tribe(s), as appropriate, within 48 hours, or as soon as reasonably possible. The Superintendent, in consultation with the Section 106 coordinator and the appropriate members of the cultural resource management (CRM) team, will make reasonable efforts to avoid, minimize, or mitigate adverse effects on those historic properties in consultation with the SHPO/THPO and federally recognized Indian Tribe(s), as appropriate. If human remains or other cultural material that may fall under the provisions of the Native American Graves Protection and Repatriation Act (NAGPRA) are present, the Superintendent will comply with NAGPRA and the Archeological Resources Protection Act (ARPA). The Superintendent will ensure that any human remains are left in situ, are not exposed, and remain protected while compliance with NAGPRA, ARPA, or other applicable federal, state, and/or local laws and procedures is undertaken.
- Within the Scattered Blowdown (Survey-First) Areas, archeological survey by archeologists meeting the Secretary of the Interior (SOI)'s Professional Qualification Standards will be completed prior to mechanical removal. Survey transects will be placed at intervals appropriate to ground visibility and terrain, with systematic coverage of high-probability landforms—specifically areas with slopes of 20 percent or less—which have the greatest potential for intact subsurface archeological deposits. These high-probability landforms are indicated on the attached maps for each treatment unit. Where the underlying geology results in rock shelters, steeper areas will be more thoroughly traversed by pedestrian walk-over to ensure adequate survey coverage. Survey findings will be reported to the SHPO/THPO prior to initiation of ground-disturbing activities in those segments.
- Within Continuous Blowdown (Removal-First) Areas, where debris density currently makes safe archeological survey impossible, NPS-approved (SOI qualified) Cultural Resource Monitors will be present during all ground-disturbing activities to document conditions, ensure compliance with avoidance measures, and identify any previously unrecorded resources. Shovel test and pedestrian survey following completion of the debris removal will then constitute the primary identification effort. The systematic coverage of high-probability landforms will also be required in these areas. Postremoval survey findings will be reported to the SHPO/THPO upon completion.
- Because the entirety of the parkway is considered a cultural landscape, the project will minimize impacts to designed elements, including plantings, overlooks, or viewsheds as designated on the historic Parkway Land Use Maps (PLUMs). Vegetation removal, staging, and equipment operations will be designed to avoid or minimize visual intrusion on key viewpoints, overlooks, trailheads, and skyline ridges identified in the national historical landmark (NHL) nomination, as well as along the mainline road corridor.
- Park staff will flag specimen trees and vegetation along the parkway and within significant viewshed for avoidance. All care should be taken to avoid aesthetic degradation of Parkway scenery. Vegetation removal within 50 feet of the parkway, when necessary for the construction or upgrading of temporary access roads, must result

in a natural, aesthetically pleasing finish, adhering to standard arborist practices and in alignment with treatment methods detailed in the applicable Blue Ridge Parkway NHL preservation objectives.

- Contractors will protect all built features and infrastructure. Contractors will minimize disturbance at all entry points along the Parkway shoulder and protect adjacent built features using matting, spotters, or barriers as needed. Logs will not be skidded on paved roads. All areas disturbed by contractor activity will be restored to original preproject condition, including the repair of any new damage to guardrails, culverts, rock walls, or signs as directed by the Contracting Officer (CO). All restored areas will match adjacent grades, vegetation, and visual character. Contractors will repair any ruts, ground disturbance, or damage to built features and road surfaces at their expense.
- Before work commences, park cultural resource staff (or a contracted representative) will inventory cultural landscape features for baseline conditions within the area of potential effects (APE), including views/vistas. Upon project completion, park cultural resource staff (or a contracted representative) will identify and document any damage to cultural landscape features, including views/vistas.
- Park staff will provide an on-site orientation for the tree debris removal work crew at the commencement of the project to advise them on natural and cultural resources. The orientation will include information on threatened and endangered species and their habitats, the types of archeological resources that could be encountered during tree debris removal, the significance of the NHL designation, and guidance for protecting and reporting any discoveries.
- Contractors will minimize disturbance at all entry points along the Parkway shoulder and protect adjacent built features using matting, spotters, or barriers as needed. Logs will not be skidded on paved roads.
- All areas disturbed by contractor activity will be restored to original preproject conditions, including the repair of any new damage to culverts, rock walls, or signs as directed by the Contracting Officer. All restored areas will match adjacent grades, vegetation, and visual character.
- Contractors will maintain a vegetated buffer as determined by the National Park Service or their designee, so that mechanical treatment landings are out of view from drivers wherever practicable. The intent of this requirement is to provide uninterrupted viewsheds of historic landscape for visitors and provide a visual screen to operations. Contractors will expect that the buffer may be 75–200 feet from the edge of roadway to the landing area.
- Contractors will repair any ruts, ground disturbance, or damage to built features and road surfaces at their expense.
- All encountered manufactured debris will be evaluated by an archeological/cultural resources monitor designated by the CO/National Park Service within defined project limits at each site prior to removal.

Human Health and Safety

- All active work areas will be closed to the public by the contractor to ensure public safety. All areas and trails that will require closures must be communicated to Contracting Officer and approved by the National Park Service prior to closure. Administrative and emergency access will be maintained and access always granted to the National Park Service and the US Forest Service (USFS) by the contractor.
- Contractors will ensure that all egress and ingress are maintained and all infrastructure such as drains and inlets within the project limits are fully functional throughout the duration of the project.
- Contractors are responsible for ensuring safe conditions to, from, and at the worksite. The contractor will provide safety controls to protect the life, health and safety of employees and all other people, as well as for the prevention of damage to property, materials, supplies, equipment, and natural and cultural resources during the performance of this contract. Contractors will be responsible for security of equipment and materials and any damage to them while in the park. The contractor is liable for any and all penalties, fines, or damages to life and property.
- Contractors will have appropriate equipment to perform work safely. Contractors will be familiar with and adhere to any and all federal, state, territorial, or local safety regulations pertaining to the operation of vehicles, to trailering, and to aerial operations, as well as to transportation operations.

Visitor Experience

- All public roads must remain open if work is being performed within an open section of the Parkway. If temporary single lane closures are required, contractors will provide traffic control. The traffic control and hauling plan should ensure the safe and efficient movement of pedestrian, bicycle, and vehicular traffic at all times during construction and hauling. It should also include the scheduling and performance of work to minimize disruption to public traffic.
- Specifications for signage, notifications, and enclosures or postings for park visitors near work areas and announcements will be provided in accordance with state regulations or National Park Service or park requirements.
- Specific signage, notifications, and protocols should also be included for (1) how project vehicles and equipment that will be crossing, traveling, or working along roadsides or highways will operate when near work areas; and (2) how visitor and commuter traffic passing by the work areas, hauling vehicles, staging areas, etc. will be controlled and managed in the project areas.

Natural Resources (General)

- Prior to sourcing materials (e.g., rock, sand, gravel), contractors will coordinate with the National Park Service at a minimum of two weeks prior to import to determine if the National Park Service has surplus material available from other projects to provide to

contractors as government furnished. If materials are suitable, contractors will use and transport these materials instead of importing. The source of imported materials must be approved by the CO/National Park Service.

- Contractors will not import into the project limits rock, sand, gravel, earth, subsoil, rip rap, gabions, or other natural materials from sources that have not been certified free of non-native, invasive plant species. Only those that are suitable to match the project needs and appropriate to the ecology of the site will be used. All materials to be imported into the project limits will require submittals and approvals by the CO.

Natural Resources

- Contractors will haul debris off-site or place it in an upland location where listed species are not known to occur.
- The National Park Service will use a biological monitor to assist with tracking and reporting during removal activities.

Wildlife

- All work, mobilization/demobilization, transport, and hauling must be during daylight hours from sunrise to sunset.
- Contractors will not feed or disturb wildlife. To prevent unnatural attractions to wildlife, keep all foods, pet foods, garbage, drinks, trash, and food and drink containers inside vehicles, or enclosed construction equipment, except during actual use.
- No ground operations will occur May 1–August 15. The time-of-year restrictions are designed to minimize disturbance to migratory birds and bats during sensitive nesting, breeding, and pupping periods while maintaining a sufficient operational window to implement the fuel reduction treatments necessary to achieve the project's wildfire risk-reduction objectives.
- No aerial operations will occur April 1–October 31. The time-of-year restrictions are designed to minimize disturbance to migratory birds and bats during sensitive nesting, breeding, and pupping periods while maintaining a sufficient operational window to implement the fuel reduction treatments necessary to achieve the project's wildfire risk-reduction objectives.
- Cabling, tying, or adhering anything to live trees is strictly prohibited.
- If a contractor observes active nests, burrows, or dens with young or breeding wildlife that are within the active action area that will be damaged by immediate operations, the contractor will notify the monitor immediately.
- Contractors will coordinate with biological monitors who will be on-site and conduct surveys ahead of the contractor's work area and mark a minimum of a 10-foot buffer (except for bald eagle nests as noted below).

- If active migratory bird nests are identified during prework surveys, those areas should be clearly flagged by the monitor, and the agreed-upon 10-foot buffer should be flagged and avoided by the contractor to the extent practicable.
- While no eagle nests are currently documented within the project action area, contractors will immediately halt work within 660 feet of any observed eagle nest or suspected eagle nesting activity. Contractors will notify the Contracting Officer and the National Park Service within 24 hours. The National Park Service will coordinate with the appropriate USFWS office to determine whether any additional protective measures are needed before work may resume within that buffer area.
- Contractors will reduce helicopter hover to the minimum time needed to make lifts.
- Contractors will ensure that the helicopter will hover as high above the canopy as possible to reduce rotor downwash.
- Contractors will use already-open areas for the staging of helicopter operations to the extent feasible.
- Contractors will limit flights to daytime hours only (30 minutes after sunrise to 30 minutes before sunset) to the extent practicable.

Federally Listed Species

- The National Park Service will conduct targeted surveys/flagging in potential small whorled pogonia habitat prior to ground disturbance and mark those areas for exclusion.

Vegetation

- Contractors will keep any dead and down logs or branches that are identifiable as pre-Helene (e.g. mossy/decomposing).
- All vehicles and equipment entering the parkway must be clean and free of plant materials, soil, and any seed to prevent introduction of invasive weeds and non-native plant species into the work site.
- Undamaged live trees and standing dead, non-hazard trees will be kept unless removal is necessary for access/staging areas. Hazard trees (leaning live/dead trees, up-turned, significantly) will be kept unless they pose a risk to operations. Trees proposed for removal must be approved by the CO. Roads, staging areas, etc. should be selected to avoid all healthy/undamaged trees to the extent feasible.
- Snags are to be left standing unless they pose a risk to contractor's operations or need to be removed to allow for access/tagging areas within the site.
- Contractors will retain at least five (5) and no more than fifteen (15) whole, storm-generated dead and downed trees per acre, with each retained tree having a bole diameter of at least eight (8) inches, to support nutrient cycling, habitat, and erosion control.

- Seed mixes will be determined by the government. Contractors will procure (source, purchase, and deliver) seed mix to site once seed mix submittal is approved by the CO. The seed mix source and seed tag will be submitted to the CO/National Park Service within two weeks prior to purchase.
- Seed will need to be thoroughly mixed by vendors/contractors such that all species are evenly distributed in the seed bags prior to being utilized on site. All seed-application rates are shown in the industry standard “pure live seed” (PLS) per pound. Actual application rate of bulk seed will be greater than PLS quantity and is dependent on purity and germination rates of seed that is commercially available at the time of purchase.
- Contractors will perform all seeding between October 1 and November 15. Seeding may not occur if soil is excessively wet or icy or if there is more than one (1) inch of snow on the ground.
- Contractors will maintain an undisturbed vegetated buffer of 10 feet surrounding known rare plant species occurrences.
- The National Park Service (or their contracted representative) will conduct invasive plant surveys and treat invasive plants where needed.

Soil

- The Contracting Officer may issue a delay during times of heavy precipitation or during freeze-thaw events where excessive rutting will occur.
- In areas subject to soil disturbance or repeated equipment use, including temporary roads, skid trails, staging areas, and loading areas, existing topsoil would be salvaged, protected from compaction and erosion, and reused to facilitate site restoration and revegetation. Following disturbance, affected areas would be decompacted and regraded to approximate natural contours, salvaged topsoil would be replaced, and areas would be promptly revegetated using NPS-approved seed mixes and appropriate erosion-control measures in accordance with NPS specifications.

Water Resources

- Contractors will not use salt or other de-icing chemicals on the roadways without approval from the CO.
- Equipment maintenance and fueling would occur off-site to the extent practicable, and no refueling would occur near wetlands, waterways, drainages, ditches, or culverts. Fuel, lubricants, and other potentially hazardous materials would be managed to prevent spills and releases, with appropriate spill-containment materials maintained on-site; any spills would be immediately contained, cleaned up, and reported to the National Park Service and other agencies as required. Equipment washout, rinsate, cleaning solutions, leftover chemicals, and similar materials would not be disposed of on NPS lands or in waterways or drainage features and would be properly removed and disposed of off-site.

- Contract operations must adhere to any and all relevant best management practices in *North Carolina Forestry Best Management Practices Manual to Protect Water Quality*, except where other specifications within the contract are more protective. Changes to best management practices (BMPs) require Contracting Officer approval.
- Appropriate erosion and siltation controls must be maintained during construction to prevent visible sediment from entering intermittent streams, perennial streams, or perennial waterbodies. All exposed soil or fill material must be permanently stabilized at the earliest practicable date.
- Contractors will provide a stormwater pollution prevention plan (SWPPP) to the Contracting Officer for approval; the plan must include NC best management practices.
- No activities are allowed in areas with flowing water or saturated soil unless otherwise permitted by the CO/National Park Service. Avoid use of haul roads and heavy equipment in wet areas. If access to complete work requires crossing of wet saturated soils or areas of flowing or stagnant water, waters of the US or wetlands, CO/NPS approval is required.
- All activities must be at a minimum distance of 50 feet from waters and wetlands unless otherwise approved by the CO.
- No discharge or filling of wetlands without CO/NPS approval.
- No activities are allowed in areas with flowing water or saturated soil unless otherwise permitted by the CO/government. Avoid use of haul roads and heavy equipment in wet areas. If access to complete work requires crossing of wet saturated soils or areas of flowing or stagnant water, waters of the US or wetlands, CO/government approval is required.
- If equipment enters a suspected wetland, photograph and then remove equipment from wetland immediately and notify the CO/NPS monitor within 24 hours. Contractors may temporarily continue working in overall units outside suspected wetland as long as stormwater BMPs are installed and continue over 50 feet from wetland. After woody biomass wildland fire fuel reduction activities are completed at the site, restoration of wetlands that are damaged by this contractor's actions should occur as soon as possible.
- Contractors will anticipate, if the Contracting Officer approves stream/waters/wetland crossing, that spanning bridges and mats should be used to cross and erosion will be minimized. Bridges and mats are preferred over temporary roads/culverts. Bridge mats will be used where mechanical equipment must cross any North Carolina designated trout waters. If the Contracting Officer approves temporary access roads, spanning bridges or mats that cross an intermittent stream, a perennial stream, or a perennial waterbody, they will be installed so as to minimize the amount of visible sediment that enters that stream or waterbody. These crossings will be installed so that: 1) stream flow will not be obstructed or impeded; 2) no intermittent stream channel, perennial stream channel, or perennial waterbody will be used as an access road or skid trail; 3) crossings are provided with effective structures or ground cover to protect the stream banks and

stream channel from accelerated erosion. Any temporary roads, trails, culverts, erosion control and other improvements (e.g. bridges, mats, etc.) at crossings must be maintained during operations and restored to original condition as soon as practicable after operations if disrupted.

- If temporary crossings are approved by Contracting Officer for access within the Construction Access Plan, and woody debris must be removed to install temporary access, any lap trees/ladder fuels should be lifted rather than dragged/skidded where removal is necessary from riparian areas or stream management zones (SMZs); stream disturbance (e.g. skidding) and removal of stumps and downed trees that are in contact with streambanks, beds, and seeps should be avoided.
- Contractors will use multiple (and the most direct) extraction access points from the parkway into the blocks to minimize stream crossings and skid trail construction to the maximum extent possible.
- Contractors will follow state, local, and federal laws and surface water protection permit best management practices and permitting.
- Erosion and sediment control products would consist of certified weed-free, 100% natural and biodegradable materials; products containing plastic, polymers, photodegradable materials, or straw would not be permitted. Fiber rolls, wattles, and sediment logs would use natural fiber netting and certified weed-free natural fill materials consistent with NPS specifications.
- Where erosion-control blankets are needed to stabilize disturbed soils, blankets composed of certified weed-free, all-natural fibers would be used; straw and synthetic netting would not be permitted. Blankets would be appropriately secured and maintained to provide effective erosion control while minimizing the potential for introducing invasive plants or entangling wildlife.

COMPLIANCE WITH NEPA

CE Citation: DOI NEPA Handbook Appendix 2, Section 11.9, C(10).

*(10) *Salvage harvesting of dead and dying trees resulting from fire, insects, disease, drought, or other disturbances, not to exceed 1,000 acres where the disturbance affects 3,000 acres of bureau-managed lands or less, and not to exceed the lesser of 5,000 acres or 1/3 of the disturbance area where the disturbance exceeds 3,000 acres of bureau-managed lands. All actions must be in conformance with applicable land use planning decisions.*

(a) Covered actions:

- (i) Cutting, yarding, and removal of dead or dying trees.*
- (ii) Cutting, yarding, and removal of live trees needed for operations, landings, skid trails, or road clearing,*
- (iii) Chipping/grinding or removal of residual slash.*
- (iv) Jackpot burning, pile burning, and underburning.*
- (v) Seeding or planting necessary to accelerate native species re- establishment.*

(b) Such actions:

- (i) Must not exceed 1 mile of permanent road construction to facilitate the covered actions, and all segments must conform to applicable land use planning decisions with route-specific designations disclosed where travel management planning has been completed.*
- (ii) May include maintenance and renovation of existing roads as needed.*
- (iii) May include construction of temporary roads not to exceed a ratio of 2.25 miles per 1,000 acres of harvest area as needed, provided they are not part of the bureau's permanent transportation system, are designed to standards appropriate for their intended use (safety, erosion control, sedimentation prevention, and resource protection), are not needed for long-term resource management, and are decommissioned and stabilized after use to minimize erosion and protect water quality.*
- (iv) Must disclose design features in documentation for use of this categorical exclusion that address the following resource considerations, consistent with applicable land use plan decisions, or where no plan requirements apply, and specify how these considerations are addressed:*
 - (1) Snag and downed wood—amount to be created or retained;*
 - (2) Erosion control—specifications or measures (e.g., water bars, dispersed slash);*
 - (3) Soil compaction—criteria for avoidance, minimization, or remediation;*
 - (4) Logging systems—types and scope of constraints (e.g., seasonal, location, extent, etc.);*
 - (5) Seasonal operations—purpose and extent of operating restrictions;*
 - (6) Invasive species—measures to prevent or limit spread;*
 - (7) Riparian areas—buffer widths and/or operating restrictions;*
 - (8) Prescribed fire—operating constraints for underburning or pile burning; and*
 - (9) Temporary roads—decommissioning standards.*

(c) Definitions:

- (i) Dying tree: A standing tree severely damaged by disturbance (e.g., fire, wind, insects, disease, drought) and, in the judgment of a forestry professional or someone technically trained for the work, is likely to die within two years.*
- (ii) Permanent road: A road constructed or reconstructed for use, as part of the bureau's permanent transportation system.*
- (iii) Temporary road: A road authorized by contract, permit, lease, written authorization, or emergency operation, not added to the permanent system, and decommissioned after use.*

CE Justification: The proposed action fits the above CE because it involves the removal, relocation, treatment, and management of storm-generated vegetative debris resulting from Hurricane Helene, a major disturbance event. Hurricane Helene led to significant dead and downed vegetation accumulated into large, concentrated debris masses.

The treatment area is 896 acres, which is under the not-to-exceed-1,000-acres limit listed in the CE. Proposed actions fit well within and are listed as covered activities, including

- (i) Cutting, yarding, and removal of dead or dying trees.*

(ii) Cutting, yarding, and removal of live trees needed for operations, landings, skid trails, or road clearing.

(iii) Chipping/grinding or removal of residual slash.

(v) Seeding or planting necessary to accelerate native species reestablishment.

Access to treatment areas will entail the establishment of temporary roads which are estimated to be 2.0 miles of total construction and will not exceed the ratio of 2.25 miles per 1,000 acres of harvest area, as needed. Temporary roads will be decommissioned, regraded, and revegetated and will not become a part of the National Park Service's permanent transportation system or road inventory.

Design features have been incorporated into the project description and mitigations of the CE documentation to address resource considerations, consistent with applicable land use plans. Specifically, the proposed action addresses logging systems, prescribed fire, and temporary roads. Mitigations address snag and downed wood, erosion control, soil compaction, seasonal operations, invasive species, and riparian areas.

Per the verification report for the establishment of this CE, the Bureau of Land Management states that the CE was established *to support authorization of the harvest of dead or dying trees impacted by biotic or abiotic disturbances. This kind of harvest activity is commonly referred to as "salvage harvest." Salvage harvest helps to recover economic timber value, contributes to rural economies, accelerates reestablishing native resilient forest tree species, reduces future wildfire fuel loads, and reduces hazards to wildland firefighters, the public, and infrastructure from dead or dying trees.*

COMPLIANCE WITH APPLICABLE LAWS AND POLICIES

National Environmental Policy Act: The National Park Service completed environmental compliance for the proposed work on September 29, 2026 (PEPC 132622), including application of a CE, concluding that the proposed action fits within the CE found at 516 Departmental Manual 1, DOI NEPA Handbook, Appendix 2, Section 11.9, C(10), and that no extraordinary circumstances apply. The National Park Service reviewed the Bureau of Land Manager's *Federal Register* notice and substantiation report and has concluded that actions are consistent with the intended use and establishment of the CE.

Section 106 of the National Historic Preservation Act: The National Park Service has not made an assessment of effect determination for the undertaking as stated in emergency notification correspondence with the North Carolina and Virginia State Historic Preservation Officers (SHPOs) and with tribes. Per formal correspondence dated May 1, 2026, the National Park Service notified the North Carolina and Virginia SHPOs of the emergency undertaking following prior advance notifications via email. The North Carolina SHPO responded per correspondence dated May 11, 2026, acknowledging the emergency undertaking with no comments. The Virginia SHPO's office responded on May 6, 2026, recognizing the undertaking proceeding under Stipulation VII of the National Park Service's Nationwide Programmatic Agreement with no other comments. On May 29, 2026, the Virginia's SHPO's office responded further, supporting the proposed protection and survey protocols outlined in the NPS

correspondence. The National Park Service sent emergency notification of the undertaking on May 1, 2026, to the Catawba Nation, Cherokee Nation, Eastern Band of Cherokee Indians, Eastern Shawnee Tribe of Oklahoma, Muscogee Nation, Monacan Indian Nation, Pamunkey Indian Tribe, Shawnee Tribe, and United Keetoowah Band of Cherokee Indians in Oklahoma. On May 28, 2026, the National Park Service discussed the undertaking with the Eastern Band of Cherokee Indians, including discussion of archeological protocols. The Shawnee Tribe responded on June 10, 2026, requesting notification of any inadvertent discoveries.

Treatment areas are organized into two categories based on debris density and the sequencing of archeological surveys: “Survey-First” and “Removal-First.” These designations represent preliminary, field-informed categorizations and may be adjusted based on verification by future archeological contractors. Where site conditions allow, pre-surveys will be conducted prior to removal activities, or sequencing may be revised accordingly. In circumstances where immediate debris removal is required to address safety or operational priorities, such as in continuous blowdown areas, removal may proceed prior to survey completion, with all feasible archeological precautions observed. The National Park Service will provide consulting parties with survey findings, notification of any resources identified during monitoring in Removal-First areas and postremoval survey findings and updated effects information upon undertaking completion.

Endangered Species Act: Following various communications with the USFWS in late 2025 and early 2026, the National Park Service notified the USFWS of the emergency conditions per correspondence dated March 30, 2026, requesting emergency consultation per Section 7 of the Endangered Species Act and 50 CFR 402.05. The USFWS responded per correspondence dated April 2, 2026, providing procedures and recommendations, including ongoing coordination involving frequent communication related to the emergency response; a list of actions and activities that occurred; initiating informal or formal consultation as soon as the emergency response is no longer needed (providing guidance for tracking and reporting activities); and working on consultation for short-term and long-term hurricane recovery efforts.

The proposed action is categorically excluded from further documentation under the National Environmental Policy Act (NEPA). This categorical exclusion (CE) is appropriate in this situation because there are no extraordinary circumstances potentially having significant effects on the environment (table 1).

TABLE 1. SCREENING FOR EXTRAORDINARY CIRCUMSTANCES

If implemented, would the proposal...	Yes/No	Explanation
A. Have significant impacts on public health or safety?	No	The primary impetus for the proposed action is to reduce wildfire risk to visitors, employees, local residents, and structures. During hazardous fuel reduction activities, the risks include hazards such as falling trees, increased presence of vehicles and equipment and limited means of ingress and egress. However, contractors will implement measures including lane closures and public notifications to protect visitors, park employees, and contracted personnel. The

If implemented, would the proposal...	Yes/No	Explanation
		National Park Service will inform and restrict the public from active work areas to ensure their safety during fuels reduction activities. Implementation-related hazards would be temporary, localized, and managed through site-specific safety plans, area closures, traffic control measures, and public notification. Emergency and administrative access would be maintained at all times in closed areas, and access would also be granted to emergency response personnel. No long-term adverse effects to public health or safety are anticipated. Therefore, there will be no significant impacts to public health and safety. Over the long term, hazardous fuel reduction will reduce the risk of large and severe wildfires within the park, benefiting public health and safety.
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	No wilderness areas, wild and scenic rivers, national natural landmarks, sole or principal drinking water aquifers, prime farmlands, floodplains, or national monuments are present in the project area. Ground disturbance will be minimized in wet or saturated soils. Hazardous fuel reduction activities must occur a minimum of 50 feet from visible streams and wetlands unless specifically approved by the National Park Service (e.g., if temporary stream or wetland crossings are necessary to facilitate equipment access for hurricane fuel reduction operations). Where equipment must cross streams or wetlands, best management practices (e.g., timber mats, bridging structures) would be used to the extent feasible to reduce impacts to wetlands. However, access routes would be planned to avoid potential waters of the US to the extent practicable. If equipment enters an unmapped wetland, the equipment will be removed from the wetland immediately; restoration of disturbed wetlands may include, but is not limited to, regrading, decompacting, and seeding. With the implementation of mitigation measures, no significant impacts to wetlands are anticipated. Emergency notification to the North Carolina and Virginia State Historic Preservation Officers (SHPOs) and Tribal Historic Preservation Officers (THPOs) identified cultural resource protections for prework and work phases (e.g. geofencing, resource monitoring) as well as postwork documentation. Treatment prescriptions were refined to avoid unnecessary removal of standing vegetation and to retain landscape characteristics consistent with Parkway management objectives. All treatment units will be surveyed for cultural resources using methods appropriate to the anticipated level

If implemented, would the proposal...	Yes/No	Explanation
		of ground disturbance and resource sensitivity, which may include pedestrian survey, surface reconnaissance, subsurface testing, and monitoring during implementation. With the implementation of these and other mitigation measures, the project team determined that the proposed action would not have a significant impact on historic or cultural resources. The proposed action was reviewed by natural and cultural resources staff to determine potential impacts to sensitive cultural resources, migratory birds, and ecologically significant or critical areas. Ground-based mechanical fuel reduction activities would not occur from May 1 to August 15 to reduce impacts to nesting migratory birds during the primary breeding season. Helicopter-based fuel reduction activities would not occur from April 1 to October 31 to reduce impacts during the primary breeding season and peak migration periods. In addition, biologists would survey areas for nesting migratory birds in advance of hazardous fuel reduction work and flag active trees for avoidance. With the implementation of these and other mitigation measures, the project team determined that the proposed action would not have a significant impact on park or recreation lands, migratory birds, or other ecologically significant or critical areas. Treatments are intended to address hurricane-generated debris while maintaining the historic and scenic character of the Parkway corridor. The proposed action is designed to restore storm-disturbed areas toward predisturbance conditions while reducing the risk of high-intensity wildfire that could further alter natural ecological processes and adversely impact the cultural landscape.
C. Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks?	No	The proposed hazardous fuel reduction and associated activities do not involve highly uncertain and potentially significant environmental effects, or unique or unknown environmental risks. The methods proposed, including mechanical fuel reduction, removal of merchantable storm-generated material, temporary access construction, and site restoration, are established land management practices routinely implemented by National Park Service and other federal land management agencies. Environmental effects are well-understood and can be effectively avoided or minimized through implementation of project design criteria and mitigation measures.
D. Establish a precedent for future action or represent a decision in principle about future actions with	No	The decision is limited to site-specific restoration of storm-generated debris accumulations following Hurricane Helene and does not establish a policy or commitment to future fuel

If implemented, would the proposal...	Yes/No	Explanation
potentially significant environmental effects?		reduction. Any future actions beyond the scope of this work will undergo separate environmental review and compliance. Such work is common following natural incidents that lead to an accumulation of debris and increased fire risk. Any future actions to respond to Hurricane Helene would have independent utility. Therefore, the project is not expected to set a precedent for future actions with significant effects, nor does it represent a decision in principle about a future consideration.
E. Have a direct relationship to other actions that implicate potentially significant environmental effects?	No	There are no connected actions to this project; all future actions and decisions will be made independently of this project. An interdisciplinary team reviewed the project and incorporated stipulations into the project design to further minimize any potential for adverse impacts on natural or cultural resources and to avoid off-site impacts that could contribute to adverse impacts from other projects in the area. Other actions related to storm recovery are planned that may also have short-term adverse impacts on park resources. Although other storm-recovery projects are occurring throughout the Parkway, each project serves a distinct purpose and undergoes independent planning and compliance review, and each has independent utility. The proposed action is limited to hazardous fuel reduction and debris management and does not rely upon other actions to achieve its purpose and need. In the long term these actions are intended to reduce wildfire risk and enhance habitat recovery and therefore would not have significant adverse impacts when combined with the effects of the proposed action.
F. Have significant impacts on properties listed, or eligible for listing, on the National Register of Historic Places as determined by the bureau?	No	Section 106 consultation and avoidance measures were outlined in the emergency notification letters to the SHPOs and tribes, including archeological survey and monitoring during work contingent upon the level of debris and access. Treatment units were refined to avoid known cultural resources to the greatest extent practicable. Archeological survey, monitoring, field marking of avoidance areas, and inadvertent discovery procedures will be implemented as appropriate. Based on resource surveys completed to date, avoidance measures incorporated into project design, ongoing consultation, and implementation of mitigation measures, no significant impacts to historic properties are anticipated. In addition, post action inventory and documentation will occur. Restoration postwork will minimize visual impacts to the Parkway.
G. Have significant impacts on species listed, or proposed to be listed, on the	No	Emergency consultation under Section 7 of the Endangered Species Act has been initiated with the US Fish and Wildlife

If implemented, would the proposal...	Yes/No	Explanation
List of Endangered or Threatened Species or have significant impacts on designated Critical Habitat for these species?		Service (USFWS). Appropriate mitigation measures have been identified and will be implemented where feasible to minimize adverse impacts to listed or proposed endangered or threatened species. Botanical surveys for small whorled pogonia and other appropriate resource surveys will be completed prior to ground disturbance. Known occurrences and sensitive habitats will be avoided and clearly marked in the field. Mitigation measures would be implemented to minimize impacts to federally listed or proposed species, such as prohibiting ground-based mechanical extraction activities from May 1 to August 15 to avoid bat pupping season, prohibiting helicopter-based extraction activities from April 1 to October 31, and leaving standing trees unless removal is necessary to facilitate equipment access. Project design criteria, mitigation measures, and ongoing coordination with the USFWS are expected to avoid significant impacts to listed species or designated critical habitat. The National Park Service will continue to consult with and inform the USFWS throughout the project to minimize project impacts. With the implementation of mitigation measures the project is not expected to have any significant impacts on any listed or proposed endangered or threatened species.
H. Significantly limit access to and ceremonial use of Indian sacred sites on Federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites?	No	Temporary closures associated with active operations would be limited in duration and geographic extent and would not be expected to significantly limit access to or ceremonial use of Indian sacred sites. Known sacred sites would be avoided, and ongoing communication with interested tribes would continue throughout project implementation. No adverse effects to the physical integrity of sacred sites are anticipated. The park provided notification to the tribes of the work along with an opportunity to provide input and will continue to consult with the tribes as requested prior to, during, and after the work.

If implemented, would the proposal...	Yes/No	Explanation
I. Contribute to potentially significant effects resulting from the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area or from other actions that promote the introduction, growth, or expansion of the range of such species (Federal Noxious Weed Control Act)?	No	Appropriate best management practices—including equipment cleaning, use of weed-free materials, and site monitoring— will be required via contract as part of hazardous fuel reduction and maintained through subsequent resource management activities including revegetation, to prevent the establishment or spread of invasive species. Debris removal areas will be surveyed for invasive plants and treated as needed; when possible, areas will be surveyed prior to treatment. Disturbed areas will be revegetated with native seed mixes and cover crops to promote regeneration of native plants. Although ground disturbance, debris removal, and movement of equipment between treatment areas presents a pathway for invasive species introduction, equipment cleaning requirements, monitoring, revegetation, and follow-up management substantially reduce this risk. Therefore, the proposed action will not contribute to potentially significant effects resulting from the introduction, continued existence, or spread of noxious weeds or non-native invasive species.

DECISION

Decision: I find the action fits within the categorical exclusion above. Therefore, I am categorically excluding the described project from further NEPA analysis. No extraordinary circumstances apply.

Signature

Superintendent:



Digitally signed by TRACY
SWARTOUT

Date: 2026.09.29 10:29:35 -04'00' **Date:**