## INTERMOUNTAIN REGION GRAND TETON NATIONAL PARK CATEGORICAL EXCLUSION FORM

NEPA	COMPLIANCE #	15-017
NEPA	COMPLIANCE #	13-01/

PMIS Number:	
	Work is planned for June 1 – September 18, 2015. Disturbance will be a perimeter

Project Title: Mormon Row Preservation Maintenance

PEPC Project Number:

**Project Description:** Work is planned for June 1 – September 18, 2015. Disturbance will be a perimeter of approximately 3 feet surrounding the buildings. Total dimensions of disturbance (including building footprints) is approximately 45,000 square feet.

This summer a crew of preservation carpenters from the Western Center for Historic Preservation, architectural conservator, Harrison Goodall, and volunteers will complete preservation maintenance tasks on approximately 20 structures at Mormon Row. The team will address failing roofs and interior supports as well as deteriorated walls, floors, windows, and doors. Work will also include applying preservative to log walls to slow decay, properly secure doors and windows, check and repair existing structural supports and cables, adding additional supports and cables if needed; and replacing foundation supports (large rocks) where necessary. Because some of the buildings at the Andy Chambers Homestead are currently used by the trails program, the team will reduce the manure build-up near the buildings which causes moisture issues with the logs. See the attached environmental screening form for additional information.

Resource impacts will be limited to previously disturbed areas. No trees or vegetation will be removed during this project but surface ground disturbance would occur from workers continuously walking around structures, as well as staging tools and materials on the ground around the buildings. Power tools and hand tools will be used for the project. Vegetation specialists will monitor the disturbance caused by staging of materials and tools.

This project is taking place in a well-trafficked area and concurrently with the Mormon Row infrastructure project. Signs will be placed in appropriate areas to keep visitors away from potentially hazardous areas with tools and materials on the ground. The team will store the majority of tools and materials inside the buildings at the end of each work day.

Describe the category used to exclude action from further NEPA analysis and indicate the number of the category (see Chapter 3 of the DO-12 Handbook). Include an explanation as to why this category is applicable, as appropriate:

C(4) Routine maintenance and repairs to cultural resource sites, structures, utilities and grounds under an approved Historic Structures Preservation Guide or Cyclic Maintenance Guide; or if the action would not adversely affect the cultural resource.

There are minor or less effects on all resources resulting from this project.

<u>Additional Notes and Mitigations</u>: The planned work will not cause ground disturbance but there will be continued coordination to determine the best place to stage work materials. To protect sage-grouse,

work from the south to the north in the Mormon Row Historic District. Trail work associated with infrastructure improvements is beginning after July 4. Betsy Engle will continue to coordinate with SRM's Sarah Dewey and Stacy re: work near the Andy Chambers structures. Both bird and bat surveys will be necessary.

## Mitigation(s):

- To protect sage-grouse, plan to work from the south to the north in the Mormon Row Historic District.
- Continue to work with the SRM Vegetation Branch (Dan Reinhart, 307-739-3678) re: controlling invasive non-natives and revegetation as appropriate.
- All project activities must comply with GRTE's Superintendent's Compendium (2014 and as updated) regulations related to food storage and park recommended best management practices for living and working in bear country. Bear "attractants" include food, drinks, garbage, cooking utensils, dirty / soiled pots/pans/plates, stoves, grills (charcoal or gas), empty or full coolers, storage containers with food or previously holding food (except approved bear resistant canisters), beverage containers, pet food/bowls, and any odorous item that may attract a bear such as toiletries.
  - 1. All staff (NPS, VIPs, Contractors, etc.) working or occupying historic properties must ensure that all bear attractants are attended at all times. All unattended attractants must be stored securely inside a building, a bear resistant food storage locker (if available), or in a hard sided vehicle with doors locked and windows closed or disposed of properly in a bear-resistant garbage receptacle.
  - 2. All personnel working on any of the historic properties must attend a briefing on proper food/attractant storage and bear safety presented by a qualified member of the park's bear management team. Contact the park's Bear Management Office (Kate Wilmot, 307-739-3673) at least one week prior to the desired start date to schedule a briefing.
  - 3. All human-bear conflicts must be reported to Teton Interagency Dispatch Center immediately (307-739-3301). All bear sightings must be reported to the park's bear management office within 24 hours.
  - 4. Provide for proper storage and disposal of materials that may be toxic to bears. All potentially toxic attractants, including petroleum products, must be stored or disposed of in such a way that they are not available to bears (see Best Practices for petroleum products below).
  - 5. Construction debris must be separated from human food garbage and disposed of in dumpsters that can be closed at night. No open dumpsters are allowed. (A request for an exception to the open dumpster stipulation can be made to the project manager who will consult with the parks wildlife branch to determine if such use will be authorized. The use of open dumpsters will only be considered if the following conditions can be met: the open dumpster must be stored behind a locked fence out of view and inaccessible to the public and will be labeled construction debris only).
- All vehicles and equipment shall be mobilized to the job site in a condition free of mud, dirt, and plant material. A method such as pressure washing prior to transport will be needed to comply with this requirement. Prior to offloading of any equipment, inspection and verbal approval must be obtained from the Government's resource management representative. The spread of exotic invasive plant species in the Park is a serious concern, and no equipment will be allowed to

offload or remain within the Park if dirt or other contaminants with the potential to harbor seeds or other plant material is apparent.

- Bird surveys may be needed where there is vegetation, especially if shrubs or trees might be removed or damaged. Under the Migratory Bird Treaty Act, no migratory bird, nest, or egg can be disturbed, removed or destroyed. To minimize the potential for harming protected birds, if the project occurs between May 1 and August 1, park resource managers will survey the site before vegetation disturbing and/or ground-breaking activities commence. Contact John Stephenson (739-3674) to schedule surveys. If other compliance has been completed, work can begin within a two-week period after surveys have cleared the area.
- A bat mitigation plan must be developed prior to initiating preservation, maintenance, or other activities at any historic property that could negatively affect bats, their roosts, or hibernacula and/or if bat sign (bat vocalizations, smell of a bat roost, bat droppings on floors or walls, bat carcasses or skeletons, oily marks (from fur) around possible access points and roost areas, lack of cobwebs along beams, feeding remains such as moth wings or other insect parts, or other sign) is observed at any site. Activities that could negatively affect bats could include, but are not limited to, building reconstruction and re-roofing. Buildings that have any of the following characteristics (disused or little used largely undisturbed; large roof void with unobstructed flying spaces; large dimension roof timbers with cracks, joints and holes; uneven roof covering with gaps; entrances that bats can fly in through; hanging tiles or wood cladding, especially on south-facing walls; setting close to woodland and/or water; pre-20th century or early 20th century construction; or roof warmed by the sun) may have a high probability of being used by bats.
- It is the responsibility of the cultural resources staff/project manager to ensure that park biologists are kept of apprised of the timing of proposed work activities, building conditions that would indicate a high probability of bat occurrence, any bat sign evident in a building scheduled for work, and to schedule surveys with enough lead time to minimize project implementation delays.
  - 1. Contact NPS biologists to schedule a survey of any property scheduled for project work that could affect bats within the building. Qualified personnel must perform a survey within the appropriate timeframe (i.e. spring surveys for maternity roosts, summer surveys for summer roosts, winter surveys for hibernacula) prior to initiating work and, if bats are found, develop a mitigation plan.
- Limit ground disturbance to the smallest area possible. Work in the previously disturbed area.
- To minimize the amount of ground disturbance, locate staging and stockpiling areas in previously
  disturbed sites to the extent possible. Return all staging and stockpiling areas to pre-construction
  conditions following construction.
- To minimize air and sound pollution associated with construction activities, limit warm up, cool down, and idling of construction equipment to the minimum durations recommended in the equipment owner's manual, taking into consideration ambient temperatures and other factors.
- Keep in mind the value of natural soundscapes and attempt to reduce noise production and impacts.

Describe compliance for other required laws, if applicable (Examples: CWA, NHPA Section 106, ESA Section 7, WSR Section 7, etc.)

NHPA: The project will improve the condition of this important historic district and will not have an adverse impact on historic character. The standard compliance process will be used for specific components of the work. Other activities would fall under programmatic exclusions IIIC1b and g.

IIIC1. Preservation maintenance and repair of historic properties.

IIIC1b. Cleaning and stabilizing of historic structures, features, fences, stone walls, plaques, and cannons using treatment methods that do not alter or cause damage to historic materials.

IIIC1g. Repair or limited in-kind replacement of rotting floorboards, roof material, or siding. Limited in-kind replacement refers to the replacement of only those elements of the feature that are too deteriorated to enable repair, consistent with the Standards.

enable repair, consister	at with the Standards.	
ESA: No Effect		
Additional information	on:	
Cunningham, Shan I		•
I am categorically ex-	nvironmental impact information in the decisio cluding the described project from further NE and the action is consistent with Chapter 3 of	PA analysis. No extraordinary
Recommended:	Carple Compliance Specialist	5/15/15 Date
Approved:	Superintendent or Designee	5/15-/15- Date