



## Categorical Exclusion Form

**Project:** Interior Alaska Forest Inventory and Analysis in Alaska National Parks (Programmatic: 2018-2023)  
**PEPC Project Number:** 79888

### Description of Action (Project Description):

This Programmatic Categorical Exclusion is intended to cover National Environmental Policy Act requirements for the Forest Inventory Analysis (FIA) in the Alaska Region National Park Service units. Individual parks, preserves and/or monuments are responsible for completing all other related compliance for individual FIA proposals or permit applications. These include a Minimum Requirements Analysis; National Historic Preservation Act Section 106 compliance including consultation; Wild and Scenic Rivers Act compatibility determinations; and Endangered Species Act consultation. The comprehensive package of compliance analysis completed by each park, preserve and/or monument; will determine whether a superintendent approves or denies an FIA proposal for a research permit. This package of compliance analyses will generate park-specific stipulations and mitigation measures for each research permit, in addition to the mitigation identified in this categorical exclusion.

**BACKGROUND:** The FIA is a nation-wide research project and dataset on the status and condition of forest resources, including indicators of ecological change and land cover trends. The FIA program has a scientifically and statistically rigorous plot sampling design, and includes nation-wide data coverage. Interior Alaska is the last remaining forested area within the United States to receive a proposal from the FIA program. Proposals to implement FIA across Alaska are anticipated, including in units of the National Park System. The USDA Forest Service (USFS) limited its proposal to the National Park Service (NPS) to exclude plots in designated wilderness.

**RESEARCH PLOTS:** Plots would be established using established protocols outlined in the Field Instruction for the Annual Inventory of Alaska (USDA Forest Service 2017). Plots would be re-sampled every 10-12 years, in perpetuity. The total working area footprint of an FIA field plot is approximately 1.5 acres. However, field data and measurements would only be collected on trees and vegetation within four subplots, each with a 24-foot radius, located within the 1.5-acre field plot.

**DATA COLLECTION:** Boring of trees would be completed when necessary to estimate site, age, or tree growth and physical conditions. Collection of vegetation specimens would only occur when field identification of unknown species is impossible due to time or resource limitations (Vascular vegetation data are only collected for species with greater than 3 percent cover on a subplot; collection of unknowns is expected to be rare.). One soil sample would be collected from each of three subplots (2, 3, and 4). The primary soil measurements include depth of the unfrozen layer, layer thicknesses, and volumetric samples of the litter, live moss, organic, and mineral soils. At each of the three subplots, a 2.125-inch diameter soil core would be drilled to the depth of either: a) 4 inches of a mineral soil horizon, b) a frozen subsurface layer is encountered, or c) a total core depth of 40 inches is reached. Typical soil core depths are estimated at 10 inches deep.

**MONUMENTATION:** Degradable monumentation would be placed in each subplot. Trees over 5 inches in diameter at breast height and all trees greater than 3 inches in diameter within the subplot would receive a tree tag and a nail painted brown at the base of the tree. The proposed protocol includes modifications to the FIA's traditional sampling method that were made via a Memorandum of Understanding between the USFS and the NPS. USFS modified its proposal to use degradable monumentation.

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**DAILY OPERATIONS:** Daily operations would consist of a crew of 2 to 4 members flying by Type 3 helicopter (6,000 lbs, 4 to 8 passengers) to an unobstructed, unimproved landing zone within a few miles from plot center. Unimproved landing zones will be selected based upon topography and accessibility, and in consultation with NPS staff. Crews would typically spend 3 to 6 hours at each plot and return to a base camp each night located outside of the park or at an approved site. Occasionally a very difficult plot would require a return visit to complete data collection.

**Project Locations:**

**Location**

<b>County:</b>	State-wide	<b>State:</b>	AK
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**Mitigation(s):**

- The Native American Graves Protection and Repatriation Act (NAGPRA), requires that if inadvertent discovery of Native American Remains or Objects occurs, activity must cease in the area of discovery, a reasonable effort made to protect the item(s) discovered, and immediate notice made to the Superintendent, as well as the appropriate Native American group(s) and State Historic Preservation Officer (SHPO). Further actions also require compliance under the provisions of NHPA and the Archaeological Resource Protection Act. As required by law, the coroner will be notified first. All provisions outlined in the Native American Graves Protection and Repatriation Act (1990) will be followed.
- The National Historic Preservation Act (NHPA) requires that if newly discovered cultural resources are identified during project implementation, work in that area must stop and the Superintendent notified immediately (36 CFR 800.13). Any discovered cultural resources must be turned over to the park immediately upon discovery.
- In the event of the discovery of unanticipated cultural resources, work will halt and the NPS archeologist will be contacted. Work will not resume until the NPS archeologist gives approval to resume.
- Archeological monitoring required; NPS cultural resource monitors (or an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards and approved by NPS) will accompany applicant for all plots that have a medium to high potential for cultural resources.
- An Investigator's Annual Report is required. This report must include plots established, inventoried, or removed. Provide blurred GIS data for monumentation locations for use in the NPS installations database.
- Applicant will remove Monumentation if the study ceases or when less intrusive plot location methods (e.g. accurate GPS technology) becomes available.
- All monumentation for research plot identification and relocation shall be biodegradable within 15 years.
- Tree tags and other monumentation shall be as unobtrusive as possible; tree tag materials will mimic colors of the vegetation in the research plot (eg. brown or tan).
- Although there is no surface evidence of archeological resources, clearance to proceed is recommended with the condition that if concealed archeological resources are encountered during project activities, all necessary steps will be taken to protect them and the Park Cultural Resources Manager will be notified immediately.
- All workers will be informed of the criminal penalties for illegally collecting artifacts or intentionally damaging any archeological or historic property. Workers will also be informed of the correct procedures should previously unknown resources be uncovered during construction activities. Data recovery excavations will be carried out under NPS guidance to mitigate adverse effects as outlined in the section on environmental consequences.
- Any components of the project that are proposed to occur in wilderness (whether designated or eligible), or that have the potential to affect wilderness, will be evaluated through the minimum requirement analysis process, and a wilderness minimum requirement worksheet will be prepared to develop alternatives.
- Wildlife shall not be approached or fed; trash receptacles must be tightly covered to avoid access by wildlife. Bear proof containers must be used whenever practicable.
- Remove all materials, including trash and food wastes, from project sites to reduce the attraction of wildlife.

- Compliance with food-storage and garbage disposal requirements must be achieved at all times.
- To minimize disturbances to wildlife and park visitors, helicopter flights shall maintain a minimum altitude of 2,000 feet above the ground surface within park boundary, except during takeoffs and landings or when visibility conditions do not allow.
- All workers will be informed of the requirement to avoid unintentional transport of any seeds or plant parts in their gear or clothing. Researchers are individually responsible for inspecting all packs, gloves, etc. to make sure they are free of plant parts prior to entering the park, in order to prevent the spread of non-native species.
- Use the smallest, quietest helicopters to accomplish the task efficiently and safely.
- All motorized vehicles are to remain on established roads at all times.
- Notify the Park Environmental Protection Specialist of the beginning and ending dates of the project(s). Also, include notification of any unexpected problems or any modifications to project implementation. Any decisions made in the field that result in greater impacts than anticipated by the proposed action must undergo additional environmental analysis.
- Helicopter and field activities will not interfere with other legal activities occurring on NPS managed lands.
- All helicopters used during project work must report identification number, color, and ownership information prior to flight over park.
- All flights shall use approved aircraft and have an approved aviation safety plan filed in advance with the NPS' Alaska Region Communication Center at 907-683-9555.
- All aviation aspects of the project shall comply with FAA regulations.

**CE Citation:**

E.5. Nondestructive data collection, inventory (including field, aerial, and satellite surveying and mapping), study, research, and monitoring activities.

**CE Justification:**

This project would establish plots for long-term inventory and monitoring of trees and associated vegetation and soils. The sampling methods proposed are considered non-destructive.

**Decision:** I find that 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

Regional  
Director:



Herbert C. Frost

Date:

19 April 2018



**Extraordinary Circumstances:**

If implemented, would the proposal...	Yes/No	Notes
<b>A. Have significant impacts on public health or safety?</b>	No	
<b>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?</b>	No	Data collected would benefit natural resource management.  No plots proposed for designated wilderness.
<b>C. Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources (NEPA section 102(2)(E))?</b>	No	
<b>D. Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks?</b>	No	
<b>E. Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects?</b>	No	
<b>F. Have a direct relationship to other actions with individually insignificant, but cumulatively significant, environmental effects?</b>	No	
<b>G. Have significant impacts on properties listed or eligible for listing on the National Register of Historic Places, as determined by either the bureau or office?</b>	No	Parks will likely need to obtain SHPO concurrence for proposed inventories
<b>H. Have significant impacts on species listed or proposed to be listed on the List of Endangered or Threatened Species, or have significant impacts on designated Critical Habitat for these species?</b>	No	Parks will conduct ESA consultation, as needed
<b>I. Violate a federal, state, local or tribal law or requirement imposed for the protection of the environment?</b>	No	
<b>J. Have a disproportionately high and adverse effect on low income or minority populations (EO 12898)?</b>	No	
<b>K. Limit access to and ceremonial use of Indian sacred sites on federal lands by Indian religious practitioners or adversely affect the physical integrity of such sacred sites (EO 130007)?</b>	No	
<b>L. Contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of such species (Federal Noxious Weed Control Act and Executive Order 13112)?</b>	No	Mitigation measures identified for preventing introduction of non-native invasive species