

FACILITIES, GROUNDS, UTILITIES AND TRAILS MAINTENANCE PROGRAM
Routine Maintenance and Repairs to Facilities, Grounds, Utilities, and Trails
Cuyahoga Valley National Park
2016-2020

The Resource Management (RM) and Maintenance Divisions (Maintenance) of the National Park Service (NPS) Cuyahoga Valley National Park (CUVA, the park) have identified a wide range of necessary routine maintenance actions. These actions will have no adverse effect on properties individually listed in or eligible for the National Register of Historic Places (NRHP), no adverse effect on historic districts and cultural landscapes, and no impact to any other significant environmental amenity. These actions, when coupled with the attached environmental commitments and NPS best practices, will have no significant impact to cultural or natural resources, and will enhance the cultural and natural environment of the park (Attachments A–C). Routine maintenance is distinguished from project work by its cyclic nature, and limits in scope, duration and intensity; all project work will be developed through the standard NPS environmental process outlined below. This programmatic categorical exclusion document (PCE) will serve as a formal record of these types of actions for the routine operation and maintenance of buildings, utilities and grounds in the park for the years 2016–2020.

PURPOSE AND NEED

The purpose of this document is to reduce uncertainties and provide increased clarification regarding the National Environmental Policy Act (NEPA) and Section 106 compliance responsibilities of the park staff for routine maintenance and repair actions. This will allow park staff to complete the designated actions in a timely manner and allow park staff to focus scarce resources on projects that, if not completed, would have environmental consequences. The actions covered by this PCE are necessary to ensure visitor and employee health and safety, reduce the potential for environmental degradation, maintain park aesthetics, reduce costs, increase staff productivity and prevent deterioration of existing facilities. These routine actions are also necessary to maintain and/or improve the current condition of existing facilities, utilities, infrastructure and other park assets. Perhaps most importantly, the actions are necessary to ensure non-impairment of the park’s cultural and natural resources.

NATIONAL ENVIRONMENTAL POLICY ACT (NEPA)

Because of their limited scope and character, the routine maintenance actions described below are categorically excluded from project-specific environmental review under NEPA. The Council on Environmental Quality (CEQ) directs agencies to categorically exclude actions “which do not individually or cumulatively have a significant effect on the human environment and which are therefore exempt from requirements to prepare an environmental impact statement” (40 CFR §1500–1508). These actions are categorically excluded under NPS Director’s Order 12, Section 3.3 categorical exclusion C. 3: *Routine maintenance and repairs to non-historic structures, facilities, utilities, grounds, and trails*. This PCE does not apply to the construction of new facilities, expansion of the footprint of new facilities, or improvement to existing facilities that would have the potential for any significant environmental impacts.

NATIONAL HISTORIC PRESERVATION ACT (NHPA; Section 106)

This PCE is intended to cover a wide range of routine actions that will have no adverse effect on properties individually listed in or determined eligible for inclusion in the NRHP, (hereafter “historic properties”) and no significant impact on any environmental amenities. Historic properties can include historic buildings, structures, objects, sites, districts and cultural landscapes. This PCE is also intended to cover the interior and exterior of modern park structures and objects that are located within, but are non-contributing elements to, historic districts and landscapes. Projects involving historic buildings, the exterior of non-historic buildings and any contributing elements within historic districts or inventoried cultural landscapes will be evaluated on a case-by-case basis in accordance with the *Programmatic Agreement among the National Park Service, the Advisory Council on Historic Preservation and the National Council of State Historic Preservation Officers (Section 106 PA)*. All activities covered by this

PCE meet the criteria for Streamlined Review under the Section 106 PA. Each year, the NPS presents the annual report of all undertakings reviewed using the Streamlined Section 106 review process to the Ohio State Historic Preservation Officer (SHPO), and all undertakings approved under this PCE will therefore be subject to SHPO oversight. As part of this annual review, the park's NEPA and National Historic Preservation Act (NHPA) compliance coordinator (NEPA and Section 106 Coordinator), CUVA Cultural Resource Management (CRM) team, and NPS Midwest Regional Section 106 Coordinator will review all actions performed under this environmental document to ensure that they conform to the streamlined criteria, and submit their review comments to SHPO in the annual report. Any actions found not to meet the streamlined criteria will be exempt from this PCE and will be processed through standard consultation with SHPO as is required under terms of the Section 106 PA and NPS policy and procedure. Further, maintenance staff will adhere to the *Secretary of the Interiors Standards for Rehabilitation* (36 CFR 67) in the treatment of all historic properties (Attachment D). Any work not able to be achieved using the Section 106 PA will be evaluated under a separate and individual NEPA and NHPA process.

REVIEW AND AMENDMENT

The Maintenance Operations Supervisor and Park NEPA and Section 106 Coordinator will maintain a list of all actions performed under this PCE and provide consistent project information (Name, Location, Division/Partner, PMIS/FMSS reference, Description) as an attachment to the environmental document in the NPS Planning, Environment, and Public Comment (PEPC) system prior to the beginning of a project. The Maintenance Operations Supervisor will incorporate Facilities Management Software System (FMSS) and Project Management Information System (PMIS) data into the PEPC documentation as appropriate. The park NEPA and Section 106 Coordinator will review the projects at the time of their submission to confirm the applicability of the PCE to the proposed work. The CUVA RM and Maintenance Division Chiefs and the CUVA Cultural Resource Management (CRM) team will review the list of projects processed under this PCE annually to ensure program compliance with its terms, consistency of its application and determine whether the documentation should be changed or amended.

All actions performed under this PCE must apply the techniques, protocols, and methodologies described above. If new techniques or significant changes in the scope of work are proposed, the project leader will consult with the NEPA and Section 106 Coordinator to request an amendment to the PCE to cover the proposed changes. CUVA's established interdisciplinary team (IDT) and CRM teams will review any proposed changes or amendments as warranted to assure that such amendments are within the scope and the spirit of this PCE. The standard for determining a significant change is based on the potential for increasing environmental impacts as determined by the NEPA Environmental Screening Form (ESF).

LOCATION

This PCE covers specific NPS actions within CUVA legislative boundary, which encompasses 33,000 acres in the Cuyahoga River Valley between the metropolitan areas of Cleveland and Akron, Ohio. The park lies within Cuyahoga and Summit counties and is located within 15 municipalities. Within the legislative boundary, the NPS owns approximately 19,000 acres. The remainder of land is owned and under management by other public entities, compatible-use institutions or private parties, many of own work in partnership with the NPS on project that are subject to NEPA and Section 106 review.

TERMINATION

If either the RM Division Chief or Maintenance Division Chief should determine that the terms of this PCE are not or cannot be carried out, they shall immediately consult to address any shortcomings, resolve differences or develop an amendment as described above. Similarly, if the Midwest Region NEPA or Section 106 Coordinator determines the terms of this PCE are not or cannot be carried out they shall notify the Superintendent, who will consult with the NEPA and Section 106 Coordinator, RM Division Chief and Maintenance Division Chief to address any shortcomings, resolve differences or develop an amendment. If within thirty (30) days or another period agreed to by both division Chiefs, an amendment cannot be reached, either Chief or the Midwest Region NEPA or Section 106 Coordinator may

recommend that the Superintendent terminate the PCE, which will be officially suspended or terminated upon the Superintendent's documented decision to do so.

Projects meeting these criteria would be considered "approved" for NEPA compliance purposes. The NEPA Specialist and NHPA Coordinator, subject matter experts and Superintendent signing the project proposal would review proposals against these criteria to ensure that the project qualifies under this Programmatic Categorical Exclusion. Projects not meeting these criteria would require individual NEPA reviews to be completed.

The undersigned understand the terms and conditions of this PCE, agree to adhere to its stipulations, and recommend its approval by the Superintendent.

NEPA and Section 106 Coordinator

Date

Chief, Maintenance

Date

Chief, Resource Management

Date