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## ENVIRONMENTAL SCREENING FORM (ESF)

Updated Sept 2015 per NPS NEPA Handbook

### A. PROJECT INFORMATION

Project Title: Integrated Pest Management methods for Invasive Plant Control (Programmatic CE - 2022-2026)  
PEPC Project Number: 106333  
PMIS Number:  
Project Type: Invasive Species Management (ISM)  
Project Location:  
County, State: Clatsop, Oregon  
County, State: Pacific, Washington  
Project Leader: Carla Cole

### B. PROJECT DESCRIPTION

From 2022 to 2026, Lewis and Clark NHP proposes conducting invasive plant control using the principals of Integrated Pest Management (IPM). IPM protects resources from invasive species while reducing risks to people and the environment by utilizing the least harmful, yet effective methods of control possible for any given species. The Park will employ an IPM approach of techniques and treatments that include manual and mechanical (hand-pulling, weed whips, brush cutters, and mowing), cultural (timing of treatment and restoration), planting of native species, and limited herbicide treatments when warranted.

Through direct experience, research, technical assistance from NPS Invasive Plant Program (IPP), and referring to Best Management Practice (BMP) guidance, the proper control prescription is determined. For major infestations, treatment strategies and application are coordinated with North Coast Cascade Network Invasive Plant Management Team (NCCN IPMT).

Manual (pulling, cutting, digging) or Mechanical (weed whacking, mowing, sawing) methods are used whenever possible.

Hand pulling and use of a weed wrench will be limited to areas outside of the boundaries of known archeological sites and Resources staff will coordinate with the Park archeologist prior to work.

When these prove ineffective, targeted herbicide use is employed. For difficult to kill species such as Himalayan and cutleaf blackberries, scotch broom, cotoneaster, and gorse, a cut-stump treatment method is used, wherein a small amount of liquid herbicide is applied directly to the freshly cut stem surface. For species like yellow iris where cut-stump treatment isn't feasible, herbicide is applied directly to the plant, as a foliar treatment, with a backpack sprayer. For woody species like holly and English laurel, the EZ-Ject lance system, which utilizes herbicide encased in capsules, is used.

Any areas treated with herbicides will be flagged and signed for identification. The area will be closed as needed in accordance with herbicide label directions following the applications.

All herbicides will be used in compliance with state and federal law and within label guidelines. All herbicide use is entered into the Pesticide Use Proposal system (PUPs) prior to use, and then the quantities applied are also entered into PUPs at the end of the season. Infestations and treatments are mapped using GIS and monitored for effectiveness.

Invasive plant control at Middle Village Station Camp is conducted with special consideration for the cultural resources of this important site. No ground disturbance is permitted within the natural ground surface at the site. Ground disturbance in elevated areas created during the park construction is permitted.

It is determined that this action can be documented under a Categorical Exclusion, in accordance with the National Environmental Policy Act (NEPA) and NPS policies. In addition, this project has been identified as an undertaking eligible for streamlined review under provisions of the National Historic Preservation Act (NHPA) and the Service wide programmatic agreement (2008). This programmatic CE will be reviewed annually. Projects would be implemented over five years from April 1, 2022 to December 30, 2026.

#### C. RESOURCE IMPACTS TO CONSIDER:

Resource	Potential for Impact	Potential Issues & Impacts
<b>Air</b> Air Quality	None	
<b>Biological</b> Nonnative or Exotic Species <i>exotic species</i>	Potential	Issue: proliferation of non-native exotic species in park lands  Impact: this project will address this issue, and have a positive impact on controlling non-native and exotic species
<b>Biological</b> Species of Special Concern or Their Habitat <i>critical salmonid habitat</i>		Issue: habitat is threatened by exotic species  Impact: positive impact from controlling exotic species in critical salmonid estuarine rearing habitat
<b>Biological</b> Vegetation <i>natural native vegetation communities</i>		Issue: there is potential for collateral damage to native plants  Impact: native plants could accidentally be killed through improper use of IPM methods
<b>Biological</b> Wildlife and/or Wildlife Habitat including terrestrial and aquatic species <i>wildlife, particularly pollinators and amphibians</i>	Potential	Issue: pollinators, amphibian, and other wildlife may be harmed by some herbicides  Impact: some herbicides have been shown to disrupt metabolic and hormonal systems of some animals
<b>Cultural</b> Archeological Resources <i>subsurface cultural resources</i>	Potential	Issue: any IPM methods that involve ground disturbance  Impact: could impact subsurface cultural resources
<b>Cultural</b> Cultural Landscapes	None	

<b>Cultural</b> Ethnographic Resources	None	
<b>Cultural</b> Museum Collections		
<b>Cultural</b> Prehistoric/historic structures	None	
<b>Geological</b> Geologic Features		
<b>Geological</b> Geologic Features	None	
<b>Geological</b> Geologic Processes	None	
<b>Lightscapes</b> Lightscapes	None	
<b>Other</b> Human Health and Safety <i>employee safety</i>		Issue: accidental exposure to herbicides  Impact: if correct PPE isn't used, and/or herbicide label instructions are not followed, serious injury may occur
<b>Paleontological</b> Paleontological Resources		
<b>Socioeconomic</b> Land Use	None	
<b>Socioeconomic</b> Minority and low- income populations, size, migration patterns, etc.	None	
<b>Socioeconomic</b> Socioeconomic	None	
<b>Soundscapes</b> Soundscapes <i>soundscape</i>	Potential	Issue: noise from weedwhackers  Impact: loud noise negatively effects soundscape while gas powered weed-whackers are in use
<b>Viewsheds</b> Viewsheds <i>historic scene</i>	Potential	Issue: non-native plants negatively impact historic scene  Impact: positive impact on historic scene viewshed will result from removing exotic plants
<b>Visitor Use and Experience</b> Recreation Resources	None	
<b>Visitor Use and Experience</b>	None	

Visitor Use and Experience		
<b>Water</b> Floodplains <i>floodplains</i>	Potential	Issue: water quality and aquatic life  Impact: use of herbicides in floodplains can result in damage to water quality and aquatic life. Therefor only aquatic approved herbicides shall be used in these areas, in compliance with all state laws and label directions
<b>Water</b> Marine or Estuarine Resources <i>tidal wetlands</i>	Potential	Issue: water quality and aquatic life  Impact: use of herbicides in tidal wetlands can result in damage to water quality and aquatic life. Therefor only aquatic approved herbicides shall be used in these areas, in compliance with all state laws and label directions
<b>Water</b> Water Quality or Quantity <i>freshwater streams and ponds</i>	Potential	Issue: water quality and aquatic life  Impact: use of herbicides near water can result in damage to water quality and aquatic life. Therefor only aquatic approved herbicides shall be used in these areas, in compliance with all state laws and label directions
<b>Water</b> Wetlands <i>wetlands</i>	Potential	Issue: water quality and aquatic life  Impact: use of herbicides in and near wetlands can result in damage to water quality and aquatic life. Therefor only aquatic approved herbicides shall be used in these areas, in compliance with all state laws and label directions

**D. ESF ADDENDUM QUESTIONS:**

Question	Answer	Notes

**IDT Team Members:**

Carla Cole - Project Leader  
Carla Cole - NEPA Specialist  
Rachel Stokeld - NHPA Specialist

**Reviewers:**

Carla Cole  
Rachel Stokeld

**Optional Signatures:**

**Compliance Specialists:**

NEPA \_\_\_\_\_ Date: \_\_\_\_\_

Carla Cole

**NHPA**

**Date:**

\_\_\_\_\_  
Rachel Stokeld

**Approved:**

**Superintendent:**

**Date:**



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## Categorical Exclusion Documentation Form (CE Form)

**Project:** Integrated Pest Management methods for Invasive Plant Control (Programmatic CE - 2022-2026)

**PEPC Project Number:** 106333

**Description of Action (Project Description):**

From 2022 to 2026, Lewis and Clark NHP proposes conducting invasive plant control using the principals of Integrated Pest Management (IPM). IPM protects resources from invasive species while reducing risks to people and the environment by utilizing the least harmful, yet effective methods of control possible for any given species. The Park will employ an IPM approach of techniques and treatments that include manual and mechanical (hand-pulling, weed whips, brush cutters, and mowing), cultural (timing of treatment and restoration), planting of native species, and limited herbicide treatments when warranted.

Through direct experience, research, technical assistance from NPS Invasive Plant Program (IPP), and referring to Best Management Practice (BMP) guidance, the proper control prescription is determined. For major infestations, treatment strategies and application are coordinated with North Coast Cascade Network Invasive Plant Management Team (NCCN IPMT).

Manual (pulling, cutting, digging) or Mechanical (weed whacking, mowing, sawing) methods are used whenever possible.

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When these prove ineffective, targeted herbicide use is employed. For difficult to kill species such as Himalayan and cutleaf blackberries, scotch broom, cotoneaster, and gorse, a cut-stump treatment method is used, wherein a small amount of liquid herbicide is applied directly to the freshly cut stem surface. For species like yellow iris where cut-stump treatment isn't feasible, herbicide is applied directly to the plant, as a foliar treatment, with a backpack sprayer. For woody species like holly and English laurel, the EZ-Ject lance system, which utilizes herbicide encased in capsules, is used.

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Invasive plant control at Middle Village Station Camp is conducted with special consideration for the cultural resources of this important site. No ground disturbance is permitted within the natural ground surface at the site. Ground disturbance in elevated areas created during the park construction is permitted.

It is determined that this action can be documented under a Categorical Exclusion, in accordance with the National Environmental Policy Act (NEPA) and NPS policies. In addition, this project has been identified as an undertaking eligible for streamlined review under provisions of the National Historic Preservation Act (NHPA)

and the Service wide programmatic agreement (2008). This programmatic CE will be reviewed annually. Projects would be implemented over five years from April 1, 2022 to December 30, 2026.

**Project Locations:**

**Location 1**

**County:** Clatsop **State:** OR

**Location 2**

**County:** Pacific **State:** WA

**Mitigation(s):**

- Cultural Resources at Middle Village  
*Comment:* No ground disturbance whatsoever is allowed within the native soil at Middle Village/Station Camp. Ground disturbance such as pulling weeds is allowed only in the built environment, where non-local fill has been brought in to build up the areas around the boardwalks.

**CE Citation:** 3.3.E.2 Restoration of noncontroversial native species into suitable habitats within their historic range and elimination of exotic species.

**CE Justification:**

This CE covers the control and elimination of non-native, exotic plant species throughout park lands. Removal of exotic species is the first step in restoring native species, and continual maintenance is required to keep exotic species from re-invading restored native plant communities.

**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**

**Superintendent:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Extraordinary Circumstances:**

If implemented, would the proposal...	Yes/No	Explanation
A. Have significant impacts on public health or safety?	No	
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	
C. Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources (NEPA section 102(2)(E))?	No	
D. Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks?	No	
E. Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects?	No	
F. Have a direct relationship to other actions with individually insignificant, but cumulatively significant, environmental effects?		
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?	No	
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?	No	
I. Violate a federal, state, local or tribal law or requirement imposed for the protection of the environment?	No	
J. Have a disproportionately high and adverse effect on low income or minority populations (EO 12898)?	No	
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)?	No	
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)?	No	





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# ASSESSMENT OF ACTIONS HAVING AN EFFECT ON HISTORIC PROPERTIES

## A. DESCRIPTION OF UNDERTAKING

1. **Park:** Lewis and Clark National Historic Park

### 2. **Project Description:**

**Project Name:** Integrated Pest Management methods for Invasive Plant Control (Programmatic CE - 2022-2026)

**Prepared by:** Rachel Stokeld    **Date Prepared:** 04/15/2022    **Telephone:** (503) 861-4440

**PEPC Project Number:** 106333

#### **Locations:**

County, State: Clatsop, OR

County, State: Pacific, WA

#### **Describe project:**

From 2022 to 2026, Lewis and Clark NHP proposes conducting invasive plant control using the principals of Integrated Pest Management (IPM). IPM protects resources from invasive species while reducing risks to people and the environment by utilizing the least harmful, yet effective methods of control possible for any given species. The Park will employ an IPM approach of techniques and treatments that include manual and mechanical (hand-pulling, weed whips, brush cutters, and mowing), cultural (timing of treatment and restoration), planting of native species, and limited herbicide treatments when warranted.

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#### **Area of potential effects (as defined in 36 CFR 800.16[d])**

All park areas

#### **3. Has the area of potential effects been surveyed to identify historic properties?**

☐ No  
☒ Yes

**Source or reference:** Results of Archaeological Survey for Otter Point Estuarine Enhancement...O'Rourke & Stokeld. 2011.  
Results of Archaeological Survey for the Proposed Colewort Creek Tidal Wetland Restoration Project,  
A Survey for CRs at Fort Clatsop National Memorial...Thomas. 1989.  
CR Assessment River Day Use Area and Park-and-Ride Facility...Wilson et al. 2004.  
National Park Service Cultural Landscapes Inventory, Fort Clatsop...WJE Assoc. 2019.  
PEDESTRIAN AND SUBSURFACE SURVEY OF THE YEON PROPERTY... Wilson & ORourke. 2017.  
Results of Arch Survey for Otter Point Estuarine Enhancement and S.Clatsop Slough Loop, Horton, 2010  
Results of Arch Survey for the Megler Creek Restoration Project...Stokeld & Dorset. 2015.  
Results of Arch Testing for the Proposed Fort to Sea Trail Reroute Project..Stokeld. 2017.  
Results of CR Survey for Fort Clatsop Water System Replacement Project..Stokeld. 2018  
Results..Arch Survey, Fort to Sea Trail Boardwalk Replacement Project..Stokeld. 2018.  
Results..Arch..Survey..Proposed Colewort Creek Tidal Wetland Rest.Project.  
ORourke&Stokeld.2012  
Summary of and Recs for Netul Trail Refuse Site at Hist. Canoe Landing. Horton&Holschuh. 2010

#### **4. Potentially Affected Resource(s):**

**Archeological Resources Present:** Yes

**Property Name:** 45PC106 - Chinook Middle Village **LCS:**  
**Location:** Middle Village unit

**Property Name:** 35CLT133 - Yeon South Site **LCS:**  
**Location:** Yeon unit

**Property Name:** 35CLT103 - Netul Trail Refuse Site **LCS:**  
**Location:** Fort Clatsop unit, Canoe Landing

**Historical Structures/Resources Present:** No

**Cultural Landscapes Present:** Yes

**Property Name:** Fort Clatsop cultural landscape **LCS:**

**Location:** Fort Clatsop unit

**Ethnographic Resources Present:** No

**5. The proposed action will: (check as many as apply)**

☐ No Destroy, remove, or alter features/elements from a historic structure

☐ No Replace historic features/elements in kind

☐ No Add non-historic features/elements to a historic structure

☐ No Alter or remove features/elements of a historic setting or environment (inc. terrain)

☐ No Add non-historic features/elements (inc. visual, audible, or atmospheric) to a historic setting or cultural landscape

☐ No Disturb, destroy, or make archeological resources inaccessible

☐ No Disturb, destroy, or make ethnographic resources inaccessible

☒ Yes Potentially affect presently unidentified cultural resources

☐ No Begin or contribute to deterioration of historic features, terrain, setting, landscape elements, or archeological or ethnographic resources

☐ No Involve a real property transaction (exchange, sale, or lease of land or structures)

☐ Other (please specify): \_\_\_\_\_

**6. Supporting Study Data:**

**(Attach if feasible; if action is in a plan, EA or EIS, give name and project or page number.)**

**B. REVIEWS BY CULTURAL RESOURCE SPECIALISTS**

The park 106 coordinator requested review by the park's cultural resource specialist/advisors as indicated by check-off boxes or as follows:

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**[ X ] 106 Advisor**

**Name:** Rachel Stokeld

**Date:** 04/16/2022

**Check if project does not involve ground disturbance [ ]**

**Assessment of Effect:** ☐ No Potential to Cause Effect ☐ No Historic Properties Affected ☒ No Adverse Effect ☐ Adverse Effect ☒ Streamlined Review

**Recommendations for conditions or stipulations:** Ground disturbance in archaeological sites requires monitoring. No ground disturbance of natural ground surface within MV as per site Veg Plan.

**Doc Method:** Streamlined Review (PA)

**Streamlined Activity:**

1. Preservation Maintenance and Repair of Historic Properties

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**[ X ] Archeologist**

**Name:** Rachel Stokeld

**Date:** 04/16/2022

**Check if project does not involve ground disturbance [ ]**

**Assessment of Effect:** ☐ No Potential to Cause Effect ☐ No Historic Properties Affected ☒ No Adverse Effect ☐ Adverse Effect ☒ Streamlined Review

**Recommendations for conditions or stipulations:** Work taking place within or adjacent to archeological sites would be monitored by an archeologist meeting Secretary of Interior's Standards (36 CFR Part 61). In the event that archaeological or historic materials are discovered during project activities, work in the immediate vicinity must stop, the area secured, and park cultural resource staff notified. No ground disturbance of natural ground surface within MV as per site Veg Plan.

**Doc Method:** Streamlined Review (PA)

**Streamlined Activity:**

1. Preservation Maintenance and Repair of Historic Properties
- 

**[ X ] Historical Landscape Architect**

**Name:** Richard Freitas

**Date:** 05/13/2022

**Comments:** The proposed IPM work to control invasive plant species will not have an adverse effect on the cultural landscape.

**Check if project does not involve ground disturbance [ ]**

**Assessment of Effect:** ☐ No Potential to Cause Effect ☐ No Historic Properties Affected ☒ No Adverse Effect ☐ Adverse Effect ☒ Streamlined Review

**Recommendations for conditions or stipulations:**

**Doc Method:** Streamlined Review (PA)

**Streamlined Activity:**

1. Preservation Maintenance and Repair of Historic Properties
- 

**No Reviews From:** Curator, Historical Architect, Historian, Other Advisor, Anthropologist

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## **C. PARK SECTION 106 COORDINATOR'S REVIEW AND RECOMMENDATIONS**

### **1. Assessment of Effect:**

☐ No Potential to Cause Effects  
☐ No Historic Properties Affected  
☒ No Adverse Effect  
☐ Adverse Effect

### **2. Documentation Method:**

**[ ] A. Standard 36 CFR Part 800 Consultation**

Further consultation under 36 CFR Part 800 is needed.

**[ X ] B. Streamlined Review Under the 2008 Servicewide Programmatic Agreement (PA)**

The above action meets all conditions for a streamlined review under section III of the 2008 Servicewide PA for Section 106 compliance.

**Applicable Streamlined Review Criteria**

(Specify 1-16 of the list of streamlined review criteria.)

1. Preservation Maintenance and Repair of Historic Properties.

**[ ] C. Undertaking Related to Park Specific or Another Agreement**

The proposed undertaking is covered for Section 106 purposes under another document such as a park, region or statewide agreement established in accord with 36 CFR 800.7 or 36 CFR 800.14.

**[ ] D. Combined NEPA/NHPA Process**

Process and documentation required for the preparation of an EA/FONSI or an EIS/ROD to comply with Section 106 is in accord with 36 CFR 800.8.c.

**[ ] E. Memo to Project File**

**3. Consultation Information**

**SHPO Required:** No

**SHPO Sent:**

**SHPO Received:**

**THPO Required:**

**THPO Sent:**

**THPO Received:**

**SHPO/THPO Notes:**

**Advisory Council Participating:** No

**Advisory Council Notes:**

**Additional Consulting Parties:** No

**4. Stipulations and Conditions:** Following are listed any stipulations or conditions necessary to ensure that the assessment of effect above is consistent with 36 CFR Part 800 criteria of effect or to avoid or reduce potential adverse effects.

Work taking place within or adjacent to archeological sites would be monitored by an archeologist meeting Secretary of Interior's Standards (36 CFR Part 61). In the event that archaeological or historic materials are discovered during project activities, work in the immediate vicinity must stop, the area secured, and park cultural resource staff notified. Invasive plant control at Middle Village Station Camp is governed by the Vegetation Management Plan created in consultation with the affiliated tribal groups. This plan prohibits any ground disturbance within the natural ground surface at the site (ground disturbance in elevated areas created during the park construction is permitted).

**5. Mitigations/Treatment Measures:** Measures to prevent or minimize loss or impairment of historic/prehistoric properties: (Remember that setting, location, and use may be relevant.)

**Required Mitigations -** For the proposed project actions to be within compliance requirements during construction and/or project implementation, the following mitigations must be adhered to:

- Cultural Resources at Middle Village  
*Comment:* No ground disturbance whatsoever is allowed within the native soil at Middle Village/Station Camp. Ground disturbance such as pulling weeds is allowed only in the built environment, where non-local fill has been brought in to build up the areas around the boardwalks.

**6. Assessment of Effect Notes:**

Activity 1d. Removal of non-historic, exotic species according to Integrated Pest Management principles when the species threatens cultural landscapes, archeological sites, or historic or prehistoric structures.  
Work is part of larger effort to restore landscape to historic condition

**D. RECOMMENDED BY PARK SECTION 106 COORDINATOR:**

**Compliance Specialist:**

**NHPA Specialist**

Rachel Stokeld \_\_\_\_\_ **Date:** \_\_\_\_\_

**E. SUPERINTENDENT'S APPROVAL**

The proposed work conforms to the NPS *Management Policies* and *Cultural Resource Management Guideline*, and I have reviewed and approve the recommendations, stipulations, or conditions noted in Section C of this form.

**Signature**

**Superintendent:** \_\_\_\_\_ **Date:** \_\_\_\_\_