



## ASSESSMENT OF ACTIONS HAVING AN EFFECT ON HISTORIC PROPERTIES

### A. DESCRIPTION OF UNDERTAKING

1. **Park:** Denali National Park and Preserve

2. **Project Description:**

**Project Name:** Polychrome Area Improvements: Bridge Design Changes

**Prepared by:** Phoebe Gilbert    **Date Prepared:** 04/18/2023    **Telephone:** 907-683-9540

**PEPC Project Number:** 113088

**Locations:**

**County, State:** Denali Borough, AK

**Describe project:**

Denali National Park and Preserve completed an Environmental Assessment (EA) for improvements to the Park Road in the Polychrome Area to address several geologic hazards that are jeopardizing public safety and infrastructure (PEPC 101706). The selected alternative included a bridge spanning the Pretty Rocks landslide at mile 45.4 of the Denali Park Road. As the bridge design progressed following the completion of the EA, some design changes were made, and other design details were refined. This compliance documentation serves as a review of the impacts that will be caused by those design changes, relative to the impacts already disclosed in the EA.

**Summary of changes to the approved action:**

- 1) The location for the western bridge abutment will be shifted approximately 150' further to the southwest. As a result, an estimated 1000 ft<sup>2</sup> of the bridge will be suspended approximately 75' above wilderness.
- 2) The new bridge alignment will shift the road alignment on the west side of the bridge. As a result, there will be less excavation of the slope above the road, less excavated material placed on the slope below the road, and the excavated slope will no longer include a bench cut, all of which include areas in wilderness.
- 3) The new abutment location will require the bridge to be longer and therefore taller: approximately 470 ft long and 50 ft tall.
- 4) The design will include the addition of up to 24 thermosiphon condensers located near the eastern end of the bridge to improve the longevity of the east abutment. These thermosiphons will be three-inch diameter steel pipes, cream-colored, clustered in two groups, and sticking 17 ft up out of the ground.
- 5) The design will include additional hardware to stabilize the slopes below the bridge: near the east abutment, a soil nail wall will be installed with a steel wire mesh facing (over an area approximately 25 ft tall and 70 ft wide) and near the west abutment, rock dowels will be installed into the slope (over an area approximately 80 ft tall and 55 ft wide).
- 6) Nest deterrents will not be incorporated into the bridge design.
- 7) The road at Bear Cave will be temporarily widened as part of Phase I, instead of phase II, to allow for oversize vehicles to turnaround near the Pretty Rocks bridge site during construction.

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

The APE is the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if such properties exist (36 CFR Part 800.16[d]). For the proposed project, the APE is between approximately mile 44 and 46 along the Park Road; it was developed to encompass the proposed project alternatives that include potential solutions to address ongoing geohazards, including the construction of a bridge to span the Pretty Rocks Landslide. The APE includes 70.16 acres where potential physical effects are likely to occur and encompasses excavation and/or filling activities, materials placement, bridge construction areas, rockfall mitigation sites, drainage ditch improvements, retaining wall construction, revegetation and recontouring, as well as potential equipment

staging and storing locations. The APE also includes a 1 mile perimeter that surrounds the boundary of the National Register of Historic Places (National Register)-listed Park Road Historic District (PRHD) (HEA-00517/MMK-00195) from mile 43 to 46 where visual, noise, and/or atmospheric effects from the proposed undertaking may potentially occur. This APE includes 5,562.90 acres (see Figure 3 of NHPA report)

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

☐ No  
☒ Yes

Source or reference:

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

**Archeological Resources Present:** Yes

**Archeological Resources Notes:** HEA-323

**Historical Structures/Resources Present:**

**Historical Structures/Resources Notes:** Denali Park Road,

**Cultural Landscapes Present:** Yes

**Cultural Landscapes Notes:** Denali Park Road,

**Ethnographic Resources Present:** No

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

☒ Yes Destroy, remove, or alter features/elements from a historic structure  
☒ Yes Replace historic features/elements in kind  
☒ Yes Add non-historic features/elements to a historic structure  
☒ Yes Alter or remove features/elements of a historic setting or environment (inc. terrain)  
☒ Yes Add non-historic features/elements (inc. visual, audible, or atmospheric) to a historic setting or cultural landscape  
☒ Yes Disturb, destroy, or make archeological resources inaccessible  
☒ No Disturb, destroy, or make ethnographic resources inaccessible  
☒ Yes Potentially affect presently unidentified cultural resources  
☒ Yes 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:** Phoebe Gilbert

**Date:** 04/18/2023

**Comments:** The change in scope does not change the physical APE or other (such as visual or noise) APE, and there are no additional historic properties that would be affected by the project beyond what was consulted on in 2021. As such, the proposed change in scope does not change the nature of the effects to any of the historic properties within the APE. We feel the scale of the adverse effect in the change of scope is of similar proportion to those on which the Memorandum of Agreement (MOA) was created. We believe the existing MOA continues to adequately address the overall effect for the project.

**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:** Mitigation from MOA (executed Feb. 18th, 2022): A. Conduct oral history interviews that include no fewer than 10 interviews with current/former tour Park Road bus drivers, park employees, Kantishna inholders, and others with a history of traversing the park road over Polychrome. B. Preparation of an approximately 40-minute video based on the DNPP's Snapshots of the Past publication. C. All surface artifacts associated with site HEA-00323 will be recovered prior to construction and in coordination with the SHPO and will be curated in the DNPP collections. D. To address adverse effects from the proposed projects, digital photographs (with associated field data) will be taken of the project areas prior to implementation, during project activities (at least once per calendar year), and upon project completion. E. An amendment to the Park Road National Register Nomination to note the new non-contributing features will be submitted to the SHPO within 8 years of execution of the MOA for 60-day review and comment. In the event that historic properties are discovered during project implementation or unanticipated effects on historic properties occur, DNPP shall consult with SHPO and other consulting parties under 36 CFR §800 in order to make reasonable efforts to avoid, minimize, or mitigate adverse effects to such properties. The Native American Graves Protection and Repatriation Act (NAGPRA), requires that if the 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.

**Doc Method:** Standard 4-Step Process

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

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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.

☐ **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.)

☐ **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:** Yes

**SHPO Sent:** Dec 22, 2022

**SHPO Received:** Jan 22, 2023

**THPO Required:** No

**THPO Sent:**

**THPO Received:**

**SHPO/THPO Notes:**

**Advisory Council Participating:** No

**Advisory Council Notes:** ACHP packet was sent on 11/19/21 for original project scope; no response was received within 15 calendar days of official dated receipt.

**Additional Consulting Parties:** Yes

**Additional Consulting Parties Notes:** TCC and Ahtna both concurred with the assessment of effect and had no additional comments. Doyon did not respond.

**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.

Mitigation from MOA (executed Feb. 18th, 2022): A. Conduct oral history interviews that include no fewer than 10 interviews with current/former tour Park Road bus drivers, park employees, Kantishna inholders, and others with a history of traversing the park road over Polychrome. 1. Submittals: a. A participant list and a copy of the questions to be used in the interviews will be prepared within three years of the signing of this MOA and will be submitted to SHPO and other signatories for a 30-day review. b. Transcriptions of interviews will be prepared within five years of the signing of this MOA and will be submitted to SHPO and other signatories. c. Accessible (508 compliant) copies of the interviews and transcriptions will be placed on the DNPP website within six years of the signing of this MOA. 1. PDF/images of the webpage in development will be sent to the SHPO for a 60-day review no later than three months before the six-year deadline. d. Deliverables (audio recordings, transcripts) will be curated at DNPP and at the University of Alaska Fairbanks Oral History Collection. B. Preparation of an approximately 40-minute video based on the DNPP's Snapshots of the Past publication. 1. Submittals: a. A draft outline of the video text and format will be

prepared within five years of the signing of this MOA and will be submitted to the SHPO and other signatories for a 60-day review. b. Two years after receiving SHPO comments on the outline, DNPP will submit a copy of the final video to SHPO and other signatories. c. The video will be curated at DNPP and will be available to the public for download on the DNPP website within eight years of the signing of this MOA. C. All surface artifacts associated with site HEA-00323 will be recovered prior to construction and in coordination with the SHPO and will be curated in the DNPP collections. 1. Submittals: a. A Summary report and condition assessment of HEA-00323 be prepared within five years of the signing of this MOA and will be submitted to SHPO and other signatories for a 60-day review. b. The AHRS card for HEA-00323 will be updated within five years of the signing of this MOA. associated field data) will be taken of the project areas prior to implementation, during project activities (at least once per calendar year), and upon project completion. 1. Submittals: a. Copies of photographs and all field data will be submitted to SHPO within five years of the signing of this MOA. b. Updates to AHRS cards will be completed within one year of the completion of the projects. c. Photographs and any field data will be curated at DNPP and will be retained in park files. E. An amendment to the Park Road National Register Nomination to note the new non-contributing features will be submitted to the SHPO within 8 years of execution of the MOA for 60-day review and comment.

**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.)

No Assessment of Effect mitigations identified.

**6. Assessment of Effect Notes:**

The change in scope does not change the physical APE or other (such as visual or noise) APE, and there are no additional historic properties that would be affected by the project beyond what was consulted on in 2021. As such, the proposed change in scope does not change the nature of the effects to any of the historic properties within the APE. We feel the scale of the adverse effect in the change of scope is of similar proportion to those on which the Memorandum of Agreement (MOA) was created. We believe the existing MOA continues to adequately address the overall effect for the project.

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

**Compliance Specialist:**

**NHPA Specialist**

Phoebe Gilbert \_\_\_\_\_ Signature on File \_\_\_\_\_

**Date:** 4/18/23

**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.

**Superintendent:** \_\_\_\_\_ Brooke Merrell, signature on file \_\_\_\_\_

**Date:** 4/25/23