



Categorical Exclusion Documentation Form (CE Form)

Project: Polychrome Area Improvements: Changes to Staging and Project Areas

Project Location: Denali Borough, AK

PEPC Project Number: 117193

Related PEPC Project: Polychrome Area Improvements Environmental Assessment (101706)

Description of Action (Project Description):

Since late August 2021, a portion of the Denali Park Road near Polychrome has been displaced by the Pretty Rocks Landslide (mile 45.4), cutting off vehicular access to popular visitor destinations and facilities including Polychrome Overlook, Toklat, Eielson Visitor Center, Wonder Lake, and Kantishna. The National Park Service 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 (NPS, 2022a). The Finding of No Significant Impact (FONSI) selected the alternative which includes constructing a bridge spanning the Pretty Rocks landslide (NPS, 2022b) and is expected to take three to four years to complete. In order to accomplish the approved project, changes to the project area and the development of additional staging areas are necessary. This compliance documentation serves as a review of the impacts associated with those changes, relative to the impacts already discussed in the EA.

Summary of changes:

- 1) At the Pretty Rocks site, the eastern boundary of the project area below the road has expanded from what was described in the EA to include an additional three acres of steep, rocky terrain (Figure 1). This boundary expansion will provide a more feasible route to access the landslide and get essential equipment to the western side of the project area. The expansion area is entirely within wilderness and motorized equipment will operate within it temporarily, for the duration of the project. Wire walls may be temporarily installed to stabilize the path, but no permanent installations or roads will be created in the expansion area. Upon completion of the project, all installations and evidence of the route will be removed, and the slope will be returned to a natural appearance.
- 2) The corridor along the Park Road between mile 43 and 48 will be used for construction staging and vehicle turnaround areas in the vicinity of Pretty Rocks, which are essential needs that were not fully addressed in the EA. In addition to the existing road and pullouts, several off-road sites between mile 43.4 and 45.9 (Figure 2) totaling up to five acres outside the project area, will be modified to create suitable staging areas. No staging areas will be located in Wilderness. Some staging areas may include wetlands, which will be avoided where possible, and no wetlands will be excavated. Site modifications will include trimming vegetation, laying down geotextile fabric, and adding aggregate material. Site modifications may include cut banks and the construction of structures such as wire walls. All of the staging areas will be modified temporarily, only for the duration of the project. Upon completion of the project, the modified areas will be restored: materials will be removed (wire walls, aggregate material, geotextile fabric, etc), the previously vegetated areas will be scarified and revegetated with native seeds, and the Park Road will be returned to its original width and centerline.

Mitigations:

- 1) Permits and certifications for impacted wetlands under the jurisdiction of the U.S. Army Corps of Engineers and the U.S. Environmental Protection Agency (per Section 401 and 404 of the Clean Water Act) must be acquired prior to construction. Stormwater Pollution Prevention Plan materials must be developed, and no wood products treated with leachable chemical components may be stored at wetland locations.

- 2) NPS must implement practices to avoid or minimize impacts to nesting birds in compliance with the Migratory Bird Treaty Act (MBTA) (16 U.S.C. 703).
- 3) NPS will document the existing condition of the abandoned historic pre-1964 road alignment at mile 45.6 before the area is modified for construction staging. Upon completion of the project, this abandoned pre-1964 historic road alignment must be restored to the pre-project condition.
- 4) An archaeological monitor must be present during any ground disturbance activities in areas that have not be previously surveyed.
- 5) Equipment and vehicles must be washed and inspected before entering the project area to ensure that invasive species are not introduced. All erosion control products must be certified weed-free. All imported aggregate must be sourced from inside the park, or certified weed-free.

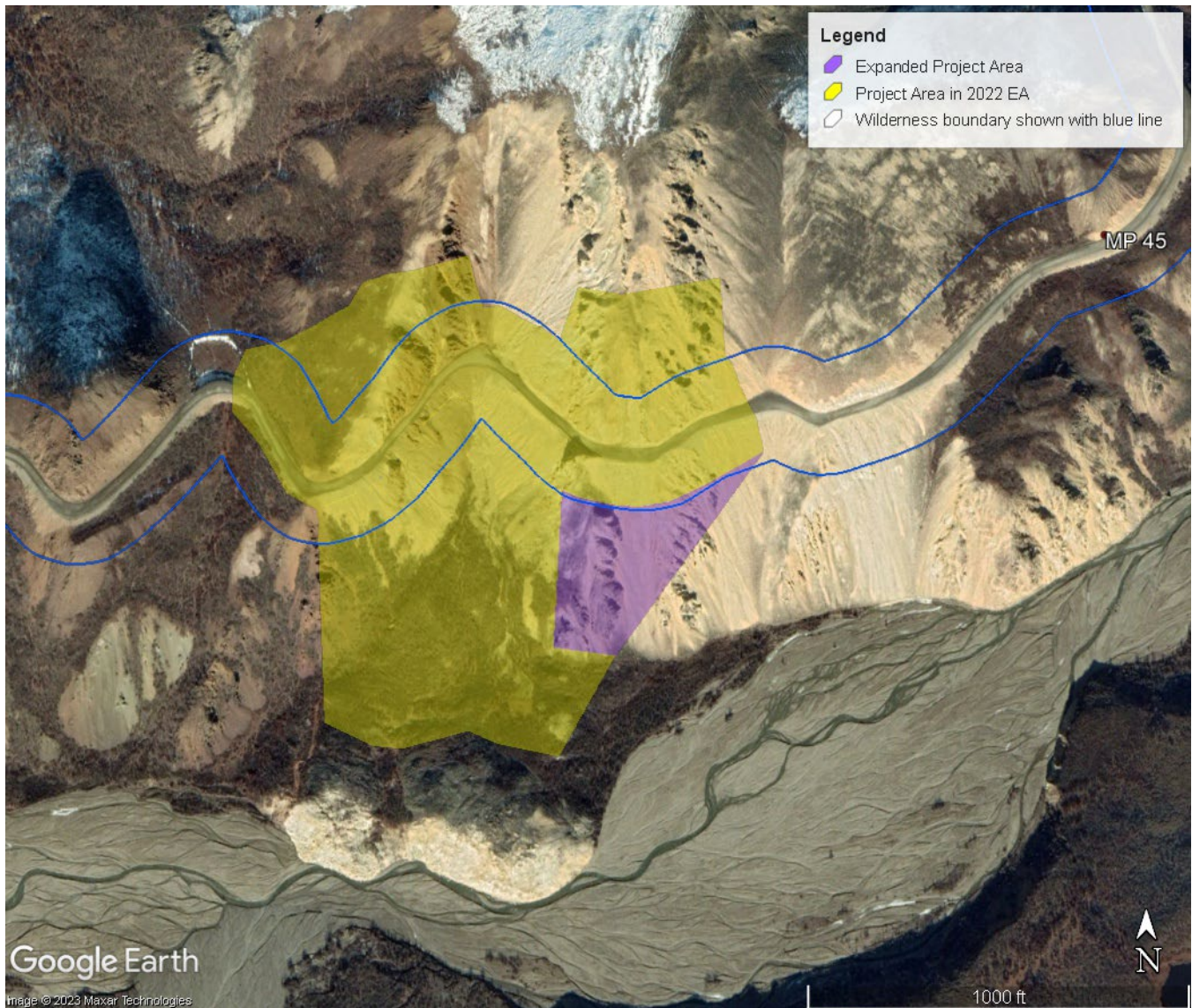


Figure 1 (NPS): Aerial view of Pretty Rocks project area.



Figure 2 (NPS): Aerial view of the Polychrome Area Improvements staging and project areas.

Impact Analysis:

Wetlands and Vegetation

Previously disclosed impacts (EA Section 3.8.2.2): The project area is mostly on steep rock slopes sparsely vegetated with species and vegetation communities that are common in the park. Less than 1 acre of wetlands is present in the project area, the majority of which is low quality wetlands and streams that are already disrupted by the Park Road or landslide activity. The project would remove or cover approximately 14 acres of vegetation during construction and would disturb some additional vegetation by driving over it with heavy machinery.

Additional Impacts: The development of off-road staging areas will remove up to five acres of vegetation outside the project area. However, the loss will occur in areas that consist of vegetation communities that are common in the park and the adverse impact will be reduced, since the areas will be revegetated with native seeds upon completion of the project. There is approximately 1 acre of wetlands and 999 liner feet of streams present in the potential staging area, almost all of which will be avoided and what can't be avoided will be filled in temporarily. These are mostly moderate to low functioning wetlands that have already been disrupted hydrologically by the Park Road. Furthermore, due to other design changes that will reduce the loss and disturbance of vegetation within the project area by more than five acres and completely avoid the wetlands

within the project area (NPS 2023), these staging areas will result in less total project impacts to wetlands and vegetation. Overall, the changes will shift where the vegetation loss will occur, but the impacts are still within the scope of the EA and the associated Statement of Findings (NPS, 2022c).

Cultural Resources

Previously disclosed impacts (EA Section 3.9.2.2): The majority of the Park Road—including the project area—is part of a historic district listed in the National Register (Mount McKinley National Park Road Historic District). The majority of the Park Road is also in an identified Cultural Landscape (Mount McKinley National Park Road Cultural Landscape). Altering the road alignment and adding new constructed features would diminish the integrity of the historic character of the road. The proposed project would also maintain access, which would preserve the historic use of this resource.

Additional Impacts: The development of off-road staging areas will alter the cultural landscape and views from the Park Road. It may also temporarily obscure some historic features, such as the abandoned pre-1964 road alignment at mile 45.6, which is a contributing feature to the Park Road Historic District and Cultural Landscape. These changes will temporarily diminish the integrity of the historic character of the road. However, the impact will be limited to a section of the road that will already be closed to the public and limited to the duration of the construction. The impact will be further reduced by restoring the modified areas to their pre-project condition upon completion of the project. The expanded project area has a very low probability for containing cultural resources and there are no additional known historic properties that would be affected within the potential staging areas beyond what was already disclosed in the EA, based on the 2021 archeology survey of the area. Therefore, although the changes will temporarily contribute to the overall project's adverse effect to the cultural resources in the area, the increase in scale of the adverse effect will be minimal. The State Historic Preservation Office, along with other consulting parties, was consulted regarding these changes in June 2023 and the existing Memorandum of Agreement (NPS, 2022d) will be amended as necessary.

Wilderness

Previously disclosed impacts (EA Section 3.10.2.2): A portion of excavation and placement of materials would occur within designated wilderness adjacent to the road. Potential bolts installed for rockfall risk reduction at several sites would be in the surface and subsurface of the wilderness. Noise and visual impacts from construction activity temporarily would diminish opportunities for solitude in wilderness areas. Maintaining road access through the Polychrome area would provide opportunities for unconfined wilderness recreation in wilderness areas accessed from the Park Road west of the project area.

Additional Impacts: The use of motorized vehicles and equipment, as well as the temporary installation of wire walls, in three acres of wilderness will diminish the undeveloped quality and opportunities for solitude or primitive recreation in that wilderness area. However, the impact will still be limited to an area which is already impacted under existing conditions, and an area which will already be closed to the public for construction. The adverse impact will be short-term, occurring during construction, and the wilderness qualities will be restored upon completion of the project. Furthermore, due to a reduction in the quantity of material to be deposited in wilderness on the slope below the road and therefore a reduction in motorized equipment operating in wilderness to place that material (NPS 2023), the additional motorized activity in the expanded project area will be offset by the reduction of motorized activity in wilderness in other project areas. Overall, these changes to the project area will shift where some of the actions in wilderness will occur but is not a change in the types of activities, nor an increase in the overall volume of activity or the scale of the impact, relative to the actions and impacts discussed in the EA and the associated Minimum Requirements Analysis (NPS, 2022a).

References:

NPS, 2022a. Polychrome Area Improvements Environmental Assessment. Denali National Park and Preserve, Alaska.

NPS, 2022b. Finding of No Significant Impact Polychrome Area Improvements. Denali National Park and Preserve, Alaska.

NPS, 2022c. Statement of Findings for Protection of Wetlands—DENA Polychrome Area Improvements. Denali National Park and Preserve, Alaska.

NPS, 2022d. Memorandum of Agreement Between the National Park Service, Denali National Park and Preserve and the Alaska State Historic Preservation Officer Regarding the Polychrome Area Improvements Project and the East Fork Area Improvements and Use Project. Denali National Park and Preserve, Alaska.

NPS, 2023. Polychrome Area Improvements: Design Changes Categorical Exclusion. Denali National Park and Preserve, Alaska.

CE Citation: 3.3.A.1 Changes or amendments to an approved action when such changes would cause no or only minimal environmental impact.

CE Justification: The construction of a bridge at Pretty Rocks (Mile 45.4) is an approved action in the Polychrome Area Improvements EA and FONSI. These changes to that approved action will shift where the impacts to wilderness, wildlife, vegetation, and wetlands would occur, but will be offset by reductions in impacts to those resources elsewhere in the project area and thus will cause no additional impacts, relative to the impacts already discussed in the EA. These changes to the project will also have small-scale and short-term impacts to the visitor experience and cultural resources by altering the viewscape, which will be lessened by restoring the impacted areas afterwards and thus will cause only minimal environmental impact.

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.

Superintendent

Signature: Signature on file – Brooke Merrell **Date:** 7/17/23

Extraordinary Circumstances:

If implemented, would the proposal...	Yes/No	Explanation
A. Have significant impacts on public health or safety?	no	The staging and project areas would be closed to the public so these changes would not impact public safety.
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	The impact to wetlands and vegetation would be limited to plant communities that are common in the park and moderate to low functioning wetlands that are already disrupted by the Park Road, and the impacted areas would be revegetated to reduce the impact. Additionally, these wildlife habitats are not unique within the park and have a low potential for containing nesting migratory birds or other sensitive species. The steep terrain of the expanded project area has a very low probability for containing cultural resources and the 2021 archeological surveys did not discover cultural resources in any of the staging areas. Furthermore, all of the impacted areas would be restored so the impacts to the historic Park Road, the visitor experience, and wilderness would be temporary. Therefore, these changes would not have significant impacts to natural or cultural resources and impacts would be minimized through mitigation measures.
C. Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources (NEPA section 102(2)(E))?	no	Similar design changes have been shared with key stakeholders and the response did not indicate that the effects would be highly controversial nor does the NPS expect the public to contest the minimal nature of the effects. None of the changes involve unresolved conflicts concerning resource uses.
D. Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks?	no	The minimal effects of the changes would be known because they can be determined from the previous analysis in the EA and would be certain because they're based on other road construction projects that have occurred along the Park Road.
E. Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects?	no	These staging areas are temporary and specific to this project and do not set a precedent for future projects.
F. Have a direct relationship to other actions with individually insignificant, but cumulatively significant, environmental effects?	no	These changes would not have a significant impact and are directly related to the bridge construction, which was also determined to have no significant impact. When considered together, no new cumulative impacts were identified.
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	These changes would temporarily affect the Park Road Historic District and Cultural Landscape (listed on the National Register) but they would not change the magnitude of the adverse effect, which was previously determined to not be significant (NPS, 2022b), and no additional mitigations would be required to reduce the effect.

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	This is not applicable because there are no endangered or threatened species or critical habitat in Denali National Park and Preserve.
I. Violate a federal, state, local or tribal law or requirement imposed for the protection of the environment?	no	No such laws would be violated.
J. Have a disproportionately high and adverse effect on low income or minority populations (EO 12898)?	no	There would be no effect on low income or minority populations.
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 13007)?	no	There are no known Indian sacred sites in the area.
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	All construction equipment would be cleaned of dirt that could harbor non-native seeds and therefore this project would have very little potential to introduce invasive species.