Categorical Exclusion Documentation Form (CE Form)

Project: Reroute of the Denali Park Road away from the Bear Cave Landslide at Mile 44.7
PEPC Project Number: 131489
Description of Action (Project Description):

As a result of geotechnical investigation (WFL, 2024) conducted after the completion of the 2022 Polychrome Area Improvements Environmental Assessment (EA) and Finding of No Significant Impact (FONSI), National Park Service (NPS) in partnership with Western Federal Lands (WFL) Highway Division, has revised the plan for Phase II of the project. Under the revised plan, a retaining wall will not be built below the Park road at Mile 44.7. Instead, a section of the Park Road near the headscarp of the Bear Cave landslide will be re-routed (Figure 1). The rerouted section will measure approximately 700 ft in length and will be shifted approximately 40 ft west, into the hillside and away from the hazard.

The new road alignment will be consistent with the historic road width (16-24 ft) and curvilinear design. Approximately 1.25 acres of vegetation will be removed during excavation for the construction of the new road alignment, 0.25 acres of which will be revegetated upon completion of the project. The abandoned road section (approximately 0.5 acres) will also be scarified and revegetated. Cut slopes above the realigned section of road may be stabilized by placing rip rap, fabric, or other means of stabilization. The new road alignment, including the cut slopes and fill slopes, will be located entirely outside of wilderness, and within the previously established Area of Potential Effect (APE). Some drainage improvements (e.g., installation of buried drains) and rockfall risk reduction (e.g., rock scaling and/or rock bolting) will also be completed in the same area, as part of the original design and FONSI for Phase II of the Polychrome Area Improvements project.

The resulting adverse effect to the Park Road Historic District and Cultural Landscape in the Bear Cave Landslide area was disclosed in the Polychrome Area Improvements EA and FONSI (NPS, 2022a and 2022b) and National Historic Preservation Act Section 106 and Tribal consultations were completed in 2021 and 2022. The effect will be mitigated according to the Memorandum of Agreement between the NPS and the State Historic Preservation Office (NPS, 2022c). The impact of constructing a road that bisects two low to moderate-functioning streams is addressed in the Polychrome Area Improvements Statement of Findings for Protection of Wetlands (NPS, 2021). The temporary impact of construction on the undeveloped quality and opportunities for solitude in the adjacent wilderness areas was considered in the Polychrome Area Improvements EA's Wilderness Act Minimum Requirements Analysis (NPS, 2022a, Appendix E). The potential impact to nesting Golden Eagles in the area was mitigated through consultation with the US Fish and Wildlife Service (NPS, 2022a).

Incorporated Best Management Practices:

- Vegetation will be removed using practices to avoid or minimize impacts to nesting birds in compliance with the Migratory Bird Treaty Act (16 U.S.C. 703).
- Equipment and vehicles will be washed and inspected before entering the project area to ensure that invasive plants are not introduced. All erosion control products will be certified weed-free. All imported aggregate will be sourced from inside the park, or certified weed-free.
- Disturbed areas will be revegetated using a native seed mix, provided by DENA.
- Prior to initiating work in the area, on-site personnel will receive a cultural sensitivity briefing from DENA staff on how to identify and report inadvertent discoveries.
- Wilderness areas adjacent to the project area will be field-identified and avoided or protected from incidental damage caused by heavy machinery and tracked vehicles during construction.
- Construction activities will be suspended when bears are within 300 yards, sheep are within 100 yards, or wolves are within 25 yards of the project area.
- Temporary erosion control measures will be implemented to protect wetlands and waters during construction.
- Clean Water Act Section 401 and 404 permits will be obtained prior to construction for any jurisdictional waters.

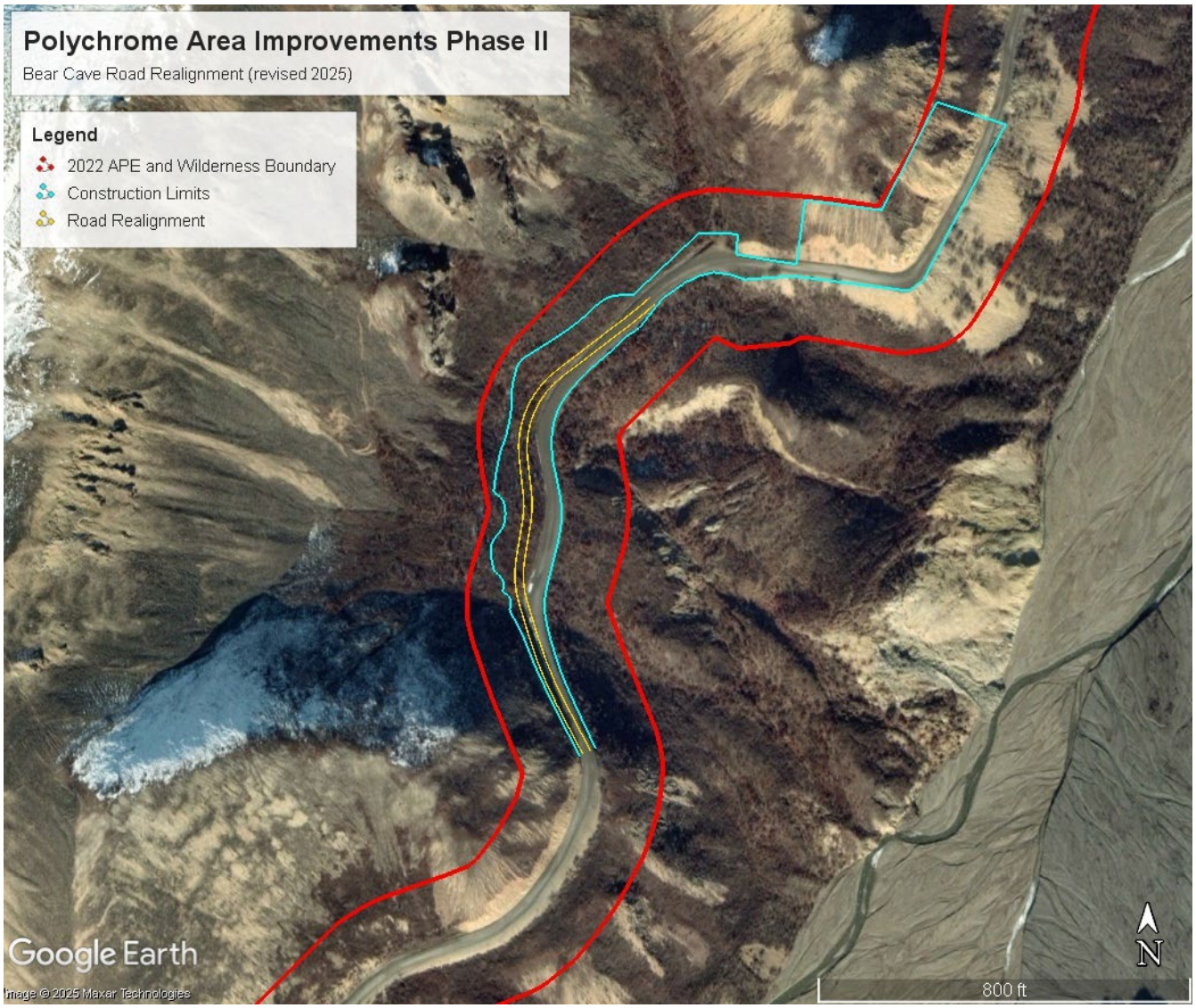

Figure 1 (NPS): Satellite view of the Bear Cave Landslide project area and revised Phase II actions (2025).

Project Locations:

County: Denali Borough **State:** AK

References:

NPS. 2021. Statement of Findings for Protection of Wetlands–DENA Polychrome Area Improvements. Prepared for Denver Service Center.

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. 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.

WFL, 2024. Geotechnical Memorandum GM4424. Denali National Park and Preserve, AK.

CE Citation: 3.3.C.30

Construction and realignment of up to 2 miles of ~~NFS~~ [park] roads and associated parking areas. Examples include but are not limited to:

1. Constructing an ~~NFS~~ [park] road to improve access to a trailhead or parking area;
2. Rerouting an ~~NFS~~ [park] road to minimize resource impacts; and
3. Improving or upgrading the surface of an ~~NFS~~ [park] road to expand its capacity.

CE Justification:

This project includes the construction and realignment of less than 2 miles of the Denali Park Road for the purpose of avoiding a hazard that is threatening the integrity of the existing road alignment.

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:

BROOKE MERRELL Digitally signed by BROOKE MERRELL
Date: 2025.07.31 09:37:53 -08'00'

Brooke Merrell

Extraordinary Circumstances:

If implemented, would the proposal...	Yes/No	Explanation
A. Have significant impacts on public health or safety?	No	This re-route would shift the road away from a hazard and improve 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; floodplains; national monuments; migratory birds; and other ecologically significant or critical areas?	No	The re-route would negatively affect some natural resources such as wilderness, wetlands, wildlife, and vegetation. However, the impacts to wilderness, wetlands, and wildlife would be no more than what was previously disclosed in the Polychrome Area Improvements EA, and those impacts were already determined to not be significant (NPS, 2022a and 2022b). The project would occur in the existing road corridor and would not occur within a wilderness area, nor an ecologically significant or critical area. No impacts to wetlands or floodplains would occur; the five perennial streams that would be impacted are small and already hydrologically disconnected from downstream areas by the existing park road so the incremental impact of the project would not be significant. (NPS, 2021). The loss of vegetation would not be significant because the vegetation type is commonly found in the park and the small size of the loss would not be detrimental to the park's ecosystem. To further minimize the impacts to natural resources, the best management practices listed in the project description would also be incorporated.
C. Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks?	No	The effects of a re-route can be determined from other road construction projects that have occurred along the Park Road and would not be significant.
D. Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects?	No	This is a site-specific solution for a hazard at this location only and does not set a precedent for future actions that would be potentially significant at this or other locations.
E. Have a direct relationship to other actions that implicate potentially significant environmental effects?	No	This project is directly related to the Phase I actions described in the Polychrome Area Improvements EA (NPS, 2022a). Since an engineered solution in the Bear Cave Landslide area was already included in the Phase II actions of the Polychrome Area Improvements EA, and found to not be cumulatively significant (NPS, 2022b), the additional impact of this re-route instead of the retaining wall would also not be significant.
F. Have significant impacts on properties listed, or eligible for listing, on the National Register of Historic Places as determined by the bureau?	No	Changing the historic alignment of the Park Road and installing incompatible new slope features near Mile 44.7 would permanently diminish the historic character of the Park Road and the project would therefore have an overall adverse effect to the Park Road Historic District (listed on the National Register of Historic Places). However, the re-route would still retain the integrity of the road's historic purpose and access to western destinations so the impact would not be significant. To minimize impacts to cultural resources, the new alignment would incorporate similar design features of the historic road alignment, and an archeological investigation would be completed prior to ground disturbance.

G. 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.
H. Significantly limit access to and ceremonial use of Indian sacred sites on Federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites?	No	This is not applicable because there are no known Indian sacred sites in the area.
I. Contribute to potentially significant effects resulting from the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area or from other actions that promote the introduction, growth, or expansion of the range of such species (Federal Noxious Weed Control Act)?	No	Best management practices incorporated into the project such as cleaning all construction equipment of dirt that could harbor non-native seeds and using a native seed mix for the revegetation would result in very little potential to introduce invasive species.