

# CHAPTER 3: SCOPE OF THE GMP/EIS

Interested public, NPS staff, and representatives from other agencies and organizations identified various issues and concerns about the park during the GMP scoping process. This information helped determine the scope or range of issues to be addressed by the general management plan.

## Planning Issues and Concerns

The following issues describe some of the preliminary needs or challenges the GMP must address for the park to carry out its responsibilities of preserving the resources and providing for public enjoyment. The general management plan alternatives provide strategies for addressing the issues within the context of the park's purpose, significance, and special mandates. The issues are listed by category below.

Not all of the issues or concerns raised by the public are included in this general management plan. Other issues raised by the public were not considered if they are already prescribed by law, regulation, or policy; if they would be in violation of laws, regulations, or policies; or if they were at a level that was too detailed for a general management plan and are more appropriately addressed in subsequent planning documents.

## **Cultural Resource Issues**

#### Cultural Landscape

San Juan Island National Historical Park was established to preserve the significant cultural resources associated with the final settlement and peaceful arbitration of the Oregon Territory boundary dispute. To help document the park's cultural landscapes, two cultural landscape inventories (CLIs) have been completed for American Camp and English Camp and were concurred with by the Washington State Historic Preservation Officer (SHPO). In addition, an inventory was completed for the Sandwith homestead at English Camp, but the Washington SHPO found the cultural landscape features ineligible for listing on the National Register due to a lack of integrity of the landscape as a whole. However, the homestead has historic significance and the park manages the homestead and its orchard as a historic property. Accordingly, the GMP alternatives would explore ways to preserve the Sandwith homestead and its orchard remnants as a historic property. At issue

for all cultural landscapes in the park is how to retain historic character, such as historic views, and how to maintain and delineate landscape features that were altered later through human or natural changes.

The NPS needs to reevaluate the use and function of historic buildings at the park. In addition, opportunities may exist to acquire and return historic buildings original to American and English camps.

#### **Curatorial Resources**

Most of the park's museum collections consisting of approximately one million objects are currently stored off-island at three locations within western Washington. Keeping the collections at centralized repositories offers safe and secure storage for the collection. However, off-island storage makes it difficult for the park to access these collections for display, rotating exhibits, academic research, and teaching purposes. Having a portion of the collections on island would require the expertise of a journeyman level curator. Associated with storage are cost and staff implications for the park budget. Analysis of curatorial storage options should be completed. Direction provided in the GMP will be in conformance with the Pacific West Region Curatorial Facilities Strategy which is part of the National Park Service Park Museum Collection Storage Plan.



Collection items displayed at the American Camp Visitor Center. NPS Photo.

#### Prehistory and Native American History

The planning process needs to help define the extent of interpretation for prehistory and Native American history. Ancestors of contemporary tribes used the resources on San Juan Island for thousands of years before being largely displaced by Euro-Americans. The groups associated with the island include several Coast Salish tribes and subgroups. Some of these groups had permanent villages, such as the Lummi at English Camp, and others used the island for seasonal food gathering and fishing. South Beach at American Camp is one park site where important research is still being done on Native American occupation and cultural practices.

### Natural Resource Issues

It has become increasingly important to acknowledge the park's natural resources, including rare terrestrial and marine habitats as well as to define park management of the ability to experience natural sounds and dark night sky. Although the park has focused primarily on managing the cultural resources it was established to protect, given the mission and policies of the NPS, the setting of the cultural landscape, and the influence of natural resources in defining the cultural landscape, it is important to balance the interpretation of the cultural and natural values.

#### Prairie and Garry Oak Woodland Restoration

Prairie and Garry oak woodlands are rare ecosystems in Puget Sound. As a result, species that depend upon them for habitat are in decline. Some of these species have been listed as threatened, endangered, or special status species, or are candidates for state or federal listing. Both of these habitats occur in the park. The park would explore ways to promote and maintain these habitats, including the use of fire, which plays a natural role in the ecosystem, vegetation management, and restoration implementation. The park would cooperate with other entities such as federal, state, local and Canadian agencies to manage these species.

#### Water Quality

San Juan Island has a limited amount of fresh water available for consumption. Some of the wells surrounding the park have experienced salt-water intrusion. At issue is how to maintain the quality and



quantity of water for park resources, staff, and visitor use. The park has an obligation to protect the quality of surface water both into and out of the park.

The park manages over six miles of shoreline, the largest in public ownership in the San Juan archipelago. The GMP needs to discuss the park's role in monitoring and response actions for potential oil spills and other coastal threats.

The opportunity exists to partner with the University of Washington's Friday Harbor Laboratories, Friends of the San Juans, and San Juan County on both marine and freshwater issues in preparing plans, such as the Westcott-Garrison Bay Marine Habitat Plan and Watershed Plan.

## Visitor Orientation/Information

Many visitors coming to San Juan Island by private boat or state ferry do not know there is a national park unit on the island. Most visitors stop at one or both of the park units without first stopping at the park headquarters site in Friday Harbor for orientation. Until recently, a private shuttle for visitors served English Camp, but not American Camp, and no public transportation was available. The planning team documented the need to inform visitors about the park, dispense information, and orient visitors once they have arrived.

Recently, park staff have taken several actions to address this issue. New waysides were developed and installed at the Anacortes Ferry Landing educating visitors about the park. Park staff have become involved in local island organizations, such as the Visitors Bureau. A private shuttle service now provides public transportation to both English and American camps. The park's website continues to be updated for visitor trip planning. Park staff would continue to find new and productive ways to orient the visitor to the park, including the idea of partnering with others for visitor orientation and information.

### **Park Facilities Issues**

#### Visitor Center

Currently the primary park visitor center is situated in an outdated and deteriorating 1979 double-wide trailer at American Camp that was intended only for temporary use. The visitor center has interpretive space for the public and three employees work in the offices year-round, but the offices are shared by as many as six employees in the summer. The planning process needs to determine the best location, size, and functions for permanent visitor facilities and services.

#### **English Camp**

The original site development plan for English Camp was designed in the 1960s and many functions have changed. Site plans, or "Schematic Design Plans," for each alternative need to address the following: the function of the historic Crook house which was built following the historic encampment period; a summer environmental camp site; amenities for park volunteers; an accessibility trail; and trail connections to an island-wide trail network, among other actions.

## Visitor Experience Issues

#### Recreation

Approximately 250,000 people annually visit the park, many of whom are island residents. The park is used by the public not only to enjoy its historical resources but to enjoy recreational opportunities that focus on the park's natural, scenic, and open space attributes.

The adequacy of facilities to maintain the appropriate level of visitor use needs to be addressed. In addition, an understanding of the island-wide trail network needs to be gained from other island organizations.

#### Boundary

Both English and American camps are adjacent to DNR managed properties. Adjacent DNR managed lands share a strong historic, ecological and spatial relationship with the park and have previously been recommended for inclusion within the park



Visitor Center at American Camp. NPS Photo.

boundaries. General management planning calls for analyzing the park boundary and the potential for inclusion of additional lands. As a result, the GMP would revisit the potential for NPS management of these lands and potentially others, in cooperation with the San Juan County Land Bank, San Juan Preservation Trust, the Bureau of Land Management, or San Juan County.

#### Adjacent Subdivisions

In 2001, San Juan County was the second fastest growing county in Washington State. Population has increased more than 40 percent over the last 10 years and residential development has grown by more than 60 percent. This level of growth adjacent to the park is already affecting park resources and likely will continue to do so in the future. The park needs to seek ways to enlist the support of park neighbors in protecting its resources. The park also needs to be able to assess the possible effects additional adjacent growth may have on the management and use of park resources. This issue will be discussed as part of the park boundary and scenic resources sections of the alternatives in Chapter 4 "Alternatives".

## New Planning Issues

The following new planning issue on intertidal areas was developed during public scoping and will be discussed in the alternatives.

#### Intertidal Areas

There is inconsistent or unknown jurisdiction of shorelines and tidelands at both American and English camps that makes management difficult for park staff. Some of the known areas are under federal jurisdiction (National Park Service) or state jurisdiction (Department of Natural Resources). Delineating the varying jurisdictions would lead to solutions for successful management.

## Issues and Concerns Not Addressed

Not all of the issues or concerns raised by the public will be addressed in this GMP. Some issues raised by the public were not considered because they are already prescribed by law, regulation, or policy; would be in violation of laws, regulations, or policies; or were at a level that was too detailed for a GMP and are more appropriately addressed in subsequent planning documents.

This section briefly describes each of these issues, and the basis for excluding them from this general management plan.

## Headquarters Building

One of the issues that was dismissed early in the planning process was the need for a new headquarters site. Park staff was leasing NPS administrative space on Spring Street close to the ferry landing. The location on the main street of Friday Harbor, however, was not as successful as originally envisioned. Most visitors to the island leave the ferry by car and do not notice the NPS sign over the door of the office. In addition, parking spaces were inadequate or unavailable near the office making public access difficult. The interior space for administrative offices was inadequate for the current park staff and had limited room for rotating exhibits and on-going research functions.

In 2004, the park's administrative offices moved from Spring Street in Friday Harbor to the Technology Center on Mullis Street approximately one-half mile away. The NPS headquarters are situated in a prominent location within the Technology Center that is leased to the NPS by the General Services Administration. There is now adequate room for staff offices, visitor information maps, and storage.

Though visitors are less likely to visit the new administrative headquarters since it is not on the town's main street, it is still in close proximity to other agency offices and organizations. In addition, the park has the potential to partner with others in developing a joint visitor information center in Friday Harbor.

## IMPACT TOPICS

Impact topics allow comparison of the consequences of implementing each alternative. These impact topics were identified based on federal laws and other legal requirements, the Council on Environmental Quality's guidelines for implementing the National Environmental Policy Act, NPS Management Policies (2006), subject-matter expertise and knowledge of limited or easily impacted resources, and issues and concerns expressed by other agencies or members of the public during scoping. Impact topics were developed to focus the environmental analysis and to ensure that alternatives were evaluated against relevant topics.

- Cultural Resources
  - Cultural Landscapes
  - Historic Buildings and Structures
  - Archaeological Resources
  - Museum Collections
- Natural Resources

- Vegetation
  - Wildlife
  - Special Status Species
  - Geologic Resources
  - Coastal Water Resources and Hydrologic Systems
  - Air Quality
- Soundscapes
- Visitor Experience
  - Interpretation, Education and Outreach
  - Recreation
  - Scenic Resources
- Visitor Access and Transportation
- Socioeconomics
- Effects on Park Operations

## Impact Topics Dismissed

The following impact topics were considered and determined not relevant to the development of this GMP for San Juan Island National Historical Park because implementing the alternatives would have no effect or a negligible effect on the topic or resource, or the resource does not occur in the park. The topics dismissed from further evaluation are as follows:

#### **Coastal Zone Management**

The Coastal Zone Management Act (16 U.S.C. 1451 et seq.) requires that all federal activities in coastal areas be consistent with approved state coastal zone management programs to the maximum extent possible. Washington State's Coastal Zone Management program excludes lands the federal government owns, holds in trust, or otherwise has the sole discretion to determine their use (Washington State Department of Ecology, 2001).

Although NPS administered lands do not require a coastal zone consistency determination, if an action may affect a coastal zone area, the National Park Service would evaluate the potential impacts on this zone and, where appropriate, consult informally with the Washington State Department of Ecology.

Under this GMP, the National Park Service proposes no development in any area of the park that would conflict with the coastal management program. A copy of this GMP/EIS has been submitted to Washington State Department of Ecology for a consistency review.

#### Energy Requirements and Conservation Potential

In both action alternatives (Alternatives B and C), new facilities are planned and would be sustainably designed. The National Park Service has adopted the concept of sustainable design as a guiding principle of facility planning and development (NPS 2006 Management Policies 9.1.1.7). The objectives of sustainability are to design facilities to minimize adverse effects on natural and cultural values, to reflect their environmental setting, and to require the least amount of nonrenewable fuels/energy in their construction and long-term maintenance and operation.

Although Alternatives B or C could result in increased energy needs, increased use would be negligible when compared in a regional context.

# Natural or Depletable Resource Requirements and Conservation Potential

Consideration of these topics is required by 40 Code of Federal Regulations (CFR) 1502.16. The National Park Service has adopted the concept of sustainable design as a guiding principle of facility planning and development (NPS 2006 Management Policies 9.1.1.7). The objectives of sustainability are to design facilities to minimize adverse effects on natural and cultural values, to reflect their environmental setting and to maintain and encourage biodiversity, to operate and maintain facilities to promote their sustainability, and to illustrate and promote conservation principles and practices through sustainable design and ecologically sensitive use. Essentially, sustainability is the concept of living within the environment with the least impact on the environment.

None of the alternatives would substantially affect the park's energy requirements because any rehabilitated or new facilities would take advantage of energy conservation methods and materials. Through sustainable design concepts and other resource management principles, the alternatives analyzed in this document would conserve natural or depletable resources.

# Urban Quality and Design of the Built Environment

Consideration of this topic is required by the Code of Federal Regulations (CFR) 1502.16. The quality of urban areas is not a concern in this planning project except possibly in the headquarters area. Throughout the park, vernacular architecture and park-compatible design would be taken into consideration for new structures built under all of the action alternatives. Emphasis would be placed on designs, materials and colors that blend with, and do not detract from, the natural or built environment. Therefore, adverse impacts are anticipated to be negligible.

#### **Environmental Justice**

On February 11, 1994, President William J. Clinton signed Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. This order requires all federal agencies to incorporate environmental justice into their missions by identifying and addressing disproportionately high and adverse human health or environmental effects of their programs/policies on minorities and low-income populations and communities. The Secretary of the Interior established Department of the Interior policy under this order in an August 17, 1994, memorandum. This memorandum directs all bureau and office heads to consider the impacts of their actions and inactions on minority and low-income populations and communities; to consider the equity of the distribution of benefits and risks of those decisions; and to ensure meaningful participation by minority and low-income populations in the department's wide range of activities where health and safety are involved.

The Environmental Protection Agency's Office of Environmental Justice defines environmental justice as:

The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no group of people, including racial, ethnic, or socioeconomic group should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies.

The goal of this "fair treatment" is not to shift risks among populations, but to identify potentially disproportionately high and adverse effects and identify alternatives that may mitigate these impacts. (U.S. Environmental Protection Agency, 1998: p. 7-8)

In responding to this executive order two questions are asked and answered as the major part of the analysis: 1) Does the potentially affected community include minority and/or low-income populations? 2) Are the environmental impacts likely to fall disproportionately on minority and/or low-income members of the community and/or tribal resources?

- The developments and actions of the alternatives would not result in any identifiable adverse human health effects. Therefore, there would be no direct or indirect negative or adverse effects on human health on any minority or low-income population or community.
- The impacts on the natural and physical environment that occur due to implementing any of the alternatives would not disproportionately adversely affect any minority or low-income population or community, or be specific to such populations or communities.
- The alternatives would not result in any identified effects that would be specific to any minority or low-income community.
- The San Juan Island National Historical Park GMP planning team actively solicited public participation as part of the planning process and gave equal consideration to all input from persons regardless of age, race, income status, or other socioeconomic or demographic factors.

 Park staff and planning team members have consulted and worked with the affected Native American tribes and will continue to improve communications and resolve any problems that may occur. In addition, the planning team did not identify any negative or adverse effects that would disproportionately and adversely affect the tribes or tribal resources.

Based on the above information and the requirements of Executive Order 12898, environmental justice was ruled out as an impact topic to be further evaluated in this document.

#### Prime and Unique Agricultural Lands

In August 1980 the Council on Environmental Quality directed that federal agencies must assess the effects of their actions on farmland soils classified by the U.S. Department of Agriculture's Natural Resource Conservation Service as prime or unique. Prime farmland is defined as soil that particularly produces general crops such as common foods, forage, fiber, and oil seed; unique farmland soils produce specialty crops such as specific fruits, vegetables, and nuts.

According to the National Resource Conservation Service, about 82 acres of the park, or 4.7 percent of the total acreage, meet the soil requirements for prime farmland. About 233 acres, or 13.3 percent of the total acreage, would meet requirements if an adequate and dependable supply of irrigation water were available. About 145 acres, or 8.3 percent of the total acreage, would meet the requirements for prime farmland if the soils were adequately drained to minimize the impact of the seasonal high water table (NRCS, 2005: p.61). These mapped units of prime and potential prime farmland are not available for farming. In addition, the alternatives do not propose irrigation or drainage for potential prime farmland to meet the requirements of prime farmland. The proposed alternatives including proposed boundary additions would have no more than a negligible impact on farmland; therefore, this topic was eliminated from further consideration.

#### Wild and Scenic Rivers

An analysis of park resources shows there are no rivers or river segments in the park that are eligible for wild and scenic river designation. Therefore, this topic was dismissed from further analysis.

#### Hazardous Materials

There are no hazardous materials used, or disposed of, in connection with park operations on federally owned property. Therefore, the topic of hazardous materials was dismissed as an impact topic in the document.

#### **Indian Trust Resources**

In general, Indian Trust Resources are related to federal land that is held in trust for a federally recognized tribe. In those situations, the federal government, represented by the Bureau of Indian Affairs (BIA) in the Department of the Interior, has an obligation to protect resources such as oil, gas and timber or the income derived from selling or leasing such resources on behalf of a tribe. San Juan Island is not within the boundaries of land that is held in trust on behalf of any federally recognized Indian tribe. Therefore, this topic was dismissed from further analysis.

#### **Sacred Sites**

Locations of sacred sites are known within the park, but are not disclosed to the public due to the wishes of interested tribes. Since the alternatives in the GMP, including any proposed boundary additions, do not affect these known sites, this topic has been dismissed from further consideration.

