

**National Park Service
U.S. Department of the Interior**



**Fort Pickens National Seashore
Escambia County, Florida**

ENVIRONMENTAL ASSESSMENT FOR THE FORT PICKENS ROAD REALIGNMENT

Finding of No Significant Impact October 2014

INTRODUCTION

The National Park Service (NPS) is proposing to realign and repave (overlay) portions of Fort Pickens Road, and to reconfigure the NPS entrance station and a parking lot in the Fort Pickens area of Gulf Islands National Seashore (national seashore). The Gulf Islands National Seashore contains several units along the Gulf of Mexico in Florida and Mississippi. Fort Pickens Road is a segment of NPS-owned and maintained road on Santa Rosa Island, a barrier island in the Gulf of Mexico, Escambia County, Florida. The entire road extends approximately 9 miles between Pensacola Beach and the Fort Pickens area, with approximately 7 miles of road within the NPS boundary. This road has been in place for over 50 years. Over the past 10 years the eastern 4 miles of the road has been destroyed multiple times during storm events, causing road closures that result in no vehicular access to the western portion of the island.

During annual storm events, the roadway becomes washed out, causing the national seashore to close the road for periods of time, ranging from days to weeks, during road repair. The road realignment is needed to relocate the existing road further inland to reduce the effects of the continued erosion of the existing road from hurricanes, other storm events, and high winds. In addition, portions of the existing roadway are now very close to the eroding Gulf of Mexico shoreline; adding to the road's vulnerability to storm events. The new road alignment would also help to reduce hazardous conditions to visitors in vehicles on Fort Pickens Road resulting from flooding of the road during storm events. The existing asphalt from the realigned portion of the road would be removed, and the area would be allowed to return to natural conditions. Portions of the existing road that would not be realigned would be repaved with a new asphalt overlay. Both parking lots #21 and #22 would be repaved.

The existing road is also located within sea turtle nesting habitat. This has caused issues with sea turtle nesting, as sea turtles have been struck by vehicles after having travelled onto the roadway while searching for a nest. Relocation of the existing road away from the Gulf of Mexico shoreline, and more inland at a higher elevation, would move it out of sea turtle nesting areas.

In addition to the road realignment and repaving (overlay), the NPS entrance station on Fort Pickens Road would be reconfigured. Currently, the entrance station includes one visitor entrance lane, an employee access entrance, fee collection booth, and a visitor exit lane. A reconfiguration is needed because current entrance delays of up to 40 minutes to process guests are common on

busy weekends; causing traffic congestion along Fort Pickens Road and extending into Pensacola Beach. An additional lane is proposed at the visitor entrance station allowing two visitor entrance lanes, an extended employee access lane, and a visitor exit lane.

PREFERRED ALTERNATIVE

Two alternatives were evaluated in the July 2014 Environmental Assessment (EA); a no action alternative and the action alternative (Alternative B) described below.

Under the preferred alternative, NPS would realign a 1.55 mile portion of the Fort Pickens Road. The road would be moved north away from the Gulf of Mexico into the more inland and higher areas of the island. Construction of the roadway would include compacting the sand and overlaying pavement on the compacted sand. The realignment would follow the natural topography of the area, with minimal dune cuts as needed. Parking lot#22 would remain in its current location. The road realignment would be slightly redirected to the existing road surface at the eastern entrance of the parking lot. Any embankment needed for this project would include the use of on-site sand. The national seashore has a sand borrow area near Battery Langdon behind the carpentry shop that has been previously used for sand borrow. Approximately 1.38 miles of the existing roadway would be demolished and removed following the construction of the new roadway. Once removed, the roadway area would be left to re-establish as a natural dune community. The current utilities located under the existing roadway or in the existing road corridor would stay in place following the road demolition. In the future, there is potential for relocating the utilities within the new proposed road corridor if the existing utility lines become affected by future storm events. Construction of the new roadway is expected to occur between September 2015 and February 2016 due to time of year restrictions for nesting shorebirds and sea turtles. Visitors would continue to have access to the Fort Pickens area via the existing road during the construction period. Construction staging areas would be located on existing impervious surfaces, in parking lot #22 and parking lot #21.

A repaving or asphalt overlay would be placed on approximately 2.79 miles of the remaining portions of Fort Pickens Road within the NPS boundary and within parking lots #21 and #22 as part of their recurring maintenance program. The asphalt overlay would add approximately 2 to 3 inches of asphalt over the existing roadway and parking lots for repaving of the roadway surface. No disturbance to the adjacent areas is expected from this action since this activity would occur within the footprint of the roadway and parking lots.

The NPS entrance station on Fort Pickens Road would be reconfigured. An additional lane would be added to the entrance area to allow simultaneous processing of two visitor entrance lanes. The exit lane would be reconstructed south of the current lane and the current exit lane would become a second entrance lane. An employee entrance would also be extended on the north side of the existing entrance station. Construction of the entrance lane extension would be similar to the road realignment. Sand would be compacted and pavement would be placed over the sand. No grading or dune cuts would be required.

ALTERNATIVES CONSIDERED

In addition to the preferred alternative, the NPS reviewed the alternatives that were developed for the *2006 Environmental Assessment to Restore Visitor Access to Fort Pickens Area, Santa Rosa Island*, and analyzed the no action alternative for the proposed Fort Pickens Road Realignment.

The no action alternative is required for the NEPA process to review and compare feasible alternatives to the existing baseline conditions. The no action alternative examines baseline

conditions against which to compare the action alternatives. Under the no action alternative, Fort Pickens Road would not be realigned or repaved. Storm events would continue to erode the roadway, resulting in situations in the future where conditions become so altered that it is no longer feasible to repair or maintain the road. This would be determined on a case by case basis. If road repairs are not feasible, Fort Pickens Road would be closed and access to the area would no longer be permitted by automobile. The no action alternative does not meet the project's objectives to reduce the number of Fort Pickens Road closures; reduce maintenance and repair of Fort Pickens Road; provide additional sea turtle nesting habitat; and reduce traffic delays at the entrance station.

No other action alternatives were analyzed.

ENVIRONMENTALLY PREFERABLE ALTERNATIVE

The Environmentally Preferable Alternative is determined by applying the criteria from Section 2.7 (D) of NPS Director's Order 12. These are the same criteria outlined in the National Environmental Policy Act (NEPA), which is implemented through the Council on Environmental Quality (CEQ) regulations. CEQ regulations provide direction that "the Environmentally Preferable Alternative is the alternative that will best promote the national environmental policy" as expressed in the six goals of Section 101(b) of NEPA which are:

1. Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
2. Assure for all generations safe, healthful, productive, and aesthetically and culturally pleasing surroundings;
3. Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
4. Preserve important historic, cultural, and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;
5. Achieve a balance between population and resource use that would permit high standards of living and a wide sharing of life's amenities; and
6. Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

Simply put, this means that the Environmentally Preferable Alternative is the alternative that causes the least damage to the biological and physical environment; it also means it is the alternative that best protects, preserves, and enhances historic, cultural, and natural resources.

After completing the environmental analysis, the NPS identified alternative B as the environmentally preferred alternative in this EA because it best meets the definition established by the CEQ. Alternative B will provide safe, vehicular access to the Fort Pickens area for future generations. Alternative B best protects natural resources, including special status species, by providing additional sea turtle nesting habitat and protection by realigning Fort Pickens Road out of sea turtle nesting habitat. Although alternative B may have adverse impacts on shorebird species resulting from the potential for mortality from vehicle collisions, this impact may also be adverse under the no action alternative. Shorebirds may be in danger of collisions with vehicles along the road on the current road alignment under the no action alternative and the realignment

under alternative B. Alternative B will be realigned into areas currently used by shorebirds, but shorebirds nest along much of the Fort Pickens area of the national seashore, and are anticipated to use the habitat along the removed road alignment, as well as any potential habitat created by dune development where the road removal will occur. Additionally, the no action alternative does not guarantee safe access to the Fort Pickens area for future generations. It is likely that Fort Pickens Road will be destroyed during a future storm event and will likely not be repaired, resulting in no vehicular access to the Fort Pickens area, greatly restricting visitor access in the Fort Pickens area of the national seashore. In addition, under the no action alternative, the entrance station will not be reconfigured, and traffic delays at the visitor entrance station will continue. The no action alternative will also continue to limit sea turtle nesting habitat and threaten this special status species.

WHY THE PREFERRED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT

As defined in 40 CFR §1508.27, significance is determined by examining the following criteria:

Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts which require analysis in an Environmental Impact Statement (EIS):

The preferred alternative would have long-term beneficial impacts on sea turtles, special status species, corresponding to a “may affect, not likely to adversely affect” impact under section 7 of the Endangered Species Act (ESA). Realignment Fort Pickens Road outside of sea turtle nesting habitat would provide additional habitat for sea turtle nesting and remove the danger of sea turtles being struck by cars. The preferred alternative would have negligible adverse impacts on the piping plover, resulting in a “may affect, not likely to adversely affect” impact under section 7 of the ESA. The preferred alternative would also have long-term moderate adverse impacts on snowy plovers and least terns due to potential mortality from vehicle strikes along the new realignment. Measures will be taken to minimize these impacts, which will also be present under the no action alternative. Shorebird protection measures can be found in the attached Shorebird Action Plan Summary (Appendix A).

Short-term moderate impacts will also result to several resources during construction activities, including noise, coastal zone and coastal barrier resources system (CBRS) areas, wildlife, transportation, visitor use and experience, and park operations. Short-term beneficial impacts will occur to socioeconomics. Short-term impacts will only last during construction activities. The preferred alternative will have negligible or long-term minor adverse impacts on soils, floodplains, wetlands, vegetation, and wildlife. However, the preferred alternative will have long-term beneficial impacts on socioeconomics, transportation, health and safety, visitor use and experience, and park operations. Additionally, beneficial impacts to soils would occur from restoring the existing roadway to natural conditions.

No significant adverse impacts were found that will require analysis in an EIS.

The degree to which the action affects public health and safety:

During construction of the proposed project, heavy construction equipment use may present safety concerns for national seashore visitors, staff, and contractors, resulting in short-term minor adverse impacts. Once construction is completed, the preferred alternative would have long-term beneficial impacts on health and safety due to the realignment of Fort Pickens Road further away

from the Gulf of Mexico. This would help to prevent hazardous conditions resulting from flooding of the current road during storm events.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, parklands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas:

As described in the EA, the following resources will not be affected by the Fort Pickens Road Realignment project: prime farmlands; wild and scenic rivers; archeological resources; historic resources; and cultural landscapes.

The preferred alternative will have long-term minor adverse impacts on wetlands. Approximately 0.134 acre of wetlands will be impacted within the project area boundary, including 0.065 acre of direct impacts and 0.069 acre of indirect impacts. These impacts may change the functions and values of these wetland areas due to the construction of the new road realignment. A *Wetland and Floodplains Statement of Findings* (SOF) was prepared with the EA to assess the functions and values of wetlands and assess impacts to wetlands from the project. Mitigation for wetland areas affected by the preferred alternative will be mitigated at a 3:1 ratio. Wetland mitigation will include invasive species treatment on 0.403 acre. This mitigation will improve the overall functionality and values in wetlands within the general wetland survey area at the national seashore.

Degree to which the effects on the quality of the human environment are likely to be highly controversial:

There were no highly controversial effects identified during either preparation of the EA or the public review period.

Degree to which the possible effects on the quality of human environment are highly uncertain or involve unique or unknown risks:

There were no highly uncertain, unique or unknown risks identified during either preparation of the environmental assessment or the public review period.

Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration:

The preferred alternative neither establishes a National Park Service precedent for future actions with significant effects nor represents a decision in principle about a future consideration.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts:

When impacts associated with the preferred alternative are added to other past, present, or future actions within the Fort Pickens area, negligible cumulative impacts are expected to soils, coastal zone or CBRS areas, and floodplains. Long-term minor adverse cumulative impacts are expected to soundscapes, vegetation, wildlife, while long-term minor to moderate adverse cumulative impacts are expected to special status species. Long-term moderate adverse cumulative impacts are anticipated to wetlands.

Long-term beneficial cumulative impacts are anticipated to socioeconomics, transportation, health and safety, visitor use and experience, and park operations.

Degree to which the action may adversely affect districts, sites, highways, or objects listed on the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources:

The preferred alternative will have no impacts on archeological resources, historic structures and districts, or cultural landscapes.

In September 2013, the NPS Southeast Archeological Center (SEAC) performed a Phase 1 archeological survey along the proposed area for the road realignment. A total of 595 shovel tests were performed, with the majority containing road fill debris from storm damage to the previous road segments. All shovel tests were negative for cultural materials. In March 2014, SEAC performed a Phase 1 archeological survey in the area surrounding the proposed reconfiguration of the NPS entrance station. A total of 39 shovel tests were performed and these were all also negative for cultural materials.

Consultation letters describing the proposed project were mailed to the Florida State Historic Preservation Office (SHPO) and 15 tribes during public scoping. A response from the SHPO was received on May 22, 2014 indicating that the project would not impact cultural resources. A response was also received from the Miccosukee Tribe of Indians of Florida on June 27, 2014 indicating the Tribe did not have any issues with the project.

A copy of the EA was also provided to the SHPO and tribes, and these groups were given the opportunity to review and comment on the EA. Three tribes including Choctaw Nation of Oklahoma, Jena Band of Choctow, and Alablama Quassarte responded to the EA. On July 7, 2014, Choctaw Nation of Oklahoma requested additional information on the archeological surveys that were completed in the project area. On July 29, 2014, Jena Band of Choctaw concurred with the determination of No Properties, as the Tribe knows of no Tribally Significant Sites in the project area. On August 4, 2014, Alabama-Quassarte Tribal Town requested to be informed of project developments in the future. In addition, in a letter dated August 20, 2014, Florida SHPO concurred with NPS' determination of *no effect on historic properties*.

Degree to which the action may adversely affect an endangered or threatened species or its critical habitat:

Consultation between the NPS and U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), and the Florida Fish and Wildlife Conservation Commission (FWC) occurred during the scoping process. Information about the proposed project was included in consultation letters to the agencies sent on April 23, 2014.

A response was received from the FWC on June 5, 2014. The FWC expressed concern about the impact of the proposed alignment to snowy plovers (*Charadrius alexandrinus tenuirostris*) and least terns (*Sterna antillarum*). A response was also received from the USFWS on May 30, 2014 that expressed concerns about impacts to listed species from the proposal, including the snowy plover, least tern, and piping plover (*Charadrius melodus*). A May 8, 2014 letter received from the NMFS noted no adverse effect to ESA listed species or critical habitat from the proposed project.

A copy of the EA was also provided to USFWS, NMFS, and FWC on July 23, 2014 for review and comment. Staff from NPS, USFWS-Panama City office, and FWC met on August 29, 2014, to assess the proposed realignment route and discuss potential concerns about shorebird nesting habitat, beach mice habitat, and overall potential habitat impacts of the proposed realignment;

various solutions for these concerns were also identified. In addition, NPS and FWC met via conference call on September 3, 2014, and discussed some of the same concerns.

In a letter dated September 17, 2014, USFWS concurred with NPS determination that the proposed project may affect, but is not likely to adversely affect the loggerhead sea turtle (*Caretta caretta*), green sea turtle (*Chelonia mydas*), leatherback sea turtle (*Dermochelys coriacea*), Kemp's ridley sea turtle (*Lepidochelys kempii*), and piping plover (*Charadrius melodus*). USFWS recommended protective measures to be implemented for further protection of the listed sea turtles, shorebirds, and Santa Rosa beach mouse. A response was received from Florida FWC on September 25, 2014. To preserve shorebird nesting area, FWC recommended slightly shifting the western portion of the alignment from Wetland #1. They also recommend that if parking lot #22 need to be moved, that it be relocated further west from the proposed location. In addition, FWC staff also recommended construction of a boardwalk and dune fencing around parking lot # 22 to allow dune regeneration and revegetation, decrease shorebird nesting issues, and provide improved public access controls at the site, such as limiting use to dedicated boardwalk areas.

Following consultation, NPS altered the western portion of the proposed realignment away from Wetland #1. Parking lot #22 will remain in its current location and the proposed realignment will be slightly redirected away from shorebird nesting habitat to meet the existing road alignment in the vicinity of the eastern Parking Lot #22 entrance. In addition, shorebird protection measures as outlined in Appendix A would be implemented.

Whether the action threatens a violation of federal, state, or local environmental protection law:

The selected alternative will not violate federal, state, or local environmental protection laws.

PUBLIC INVOLVEMENT

Public scoping was conducted to inform various agencies and the public about the proposed Fort Pickens Road realignment.

Public scoping included a project scoping newsletter released on March 27, 2014 that described the proposed project and preliminary draft alternatives. The newsletter provided the park background, current conditions within the project area, project background and description, description of the NEPA process, and included the public scoping period. A notification of the project and public scoping period was displayed in the *Pensacola News Journal*. The public was invited to comment and identify any issues or concerns. The public scoping period lasted for a total of 33 days, and 22 correspondences were received.

The EA for the Fort Pickens Road Realignment was released to the public on July 23, 2014. A press release was prepared and published in *Pensacola News Journal* to inform the public of the release of the EA and the public comment review period. The EA provided descriptions of the purpose and need for action, the proposed and no action alternative, park resources, and a detailed analysis of environmental impacts from the proposed project. The public was invited to submit comments on the EA through August 22, 2014. A total of 36 correspondences were received on the EA.

During the comment period, a public open house was held on August 19, 2014, between 3:00pm to 7:00pm at the Naval Live Oaks Visitor Center in Gulf Breeze, Florida. This meeting presented information about the purpose, objectives, and background of the project, in addition to details on the preferred alternative and no action alternative. NPS staff were on hand to discuss commenters' issues and concerns. A total of 13 individuals attended the meeting.

CONCLUSION

The selected alternative does not constitute an action that normally requires preparation of an Environmental Impact Statement (EIS). The selected alternative will not have a significant adverse effect on the human environment. There are no adverse effects to physical resources, water resources, natural resources, cultural resources, or other unique resources within the region. No highly uncertain or controversial impacts, unique or unknown risks, or known cumulative effects were identified.

After careful and thorough consideration of the facts contained herein, the undersigned finds that the proposed Federal actions are consistent with existing national environmental policies and objectives as set forth in Section 101(a) of NEPA and that they will not significantly affect the quality of the human environment or otherwise include any condition requiring consultation pursuant to Section 102 (2)(c) of NEPA.

Based on the foregoing, it has been determined that an EIS is not required for this project and thus will not be prepared.

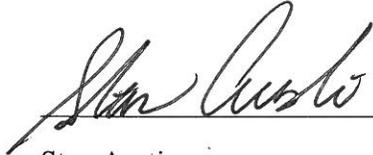
Recommended:



Date: 10/6/14

Daniel R. Brown
Superintendent
Gulf Islands National Seashore

Approved:



Date: 11/15/14

Stan Austin
Regional Director
Southeast Region

APPENDIX A
SHOREBIRD ACTION PLAN SUMMARY

**Gulf Islands National Seashore – Florida District
Shorebird Nesting Season
Action Plan Summary**

Management Strategies

- Reduced schedule for sand removal from road shoulders/bike lanes during nesting season
- Road repairs and/or construction scheduled during non-nesting periods
- Limited and targeted access by DWH oil spill clean-up crews during nesting season
- Eliminated road shoulder parking along Ft. Pickens Road and Hwy. 399 and went to designated/designated parking; plan to eliminate road shoulder parking on Johnson Beach Road (Perdido Key) and replace with designated/designated parking; convert last ½ mile of road to multi-use trail
- Storm damage/destruction of Ft. Pickens Road: no rebuild scenario; ferry-only access
- Posted nesting closure areas, including some parachute cord exclosures
- SUNY (State University of New York) study to validate road mortality statistics
- Vegetative plantings along road shoulders to discourage nesting close to roads
- Speed limits reduced to 20 mph during nesting season in designated areas
- “Pace car” magnetic tailgate signs for staff vehicles (“Shorebird Area – 20 mph DO NOT PASS”)
- Portable reader boards with info. on nesting areas and reduced speed limits
- Permanent reader boards at park entrances and/or on park entrance stations
- Portable radar speed limit signs
- Predator control program through USDA, primarily trapping coyotes & red fox; park funded (\$15k-\$20k/year); part of BP NRDA shorebird habitat restoration project (implemented by state)
- Prohibited kite surfing

Physical Design

- Ft. Pickens Road
 - realignment & 25 mph curve design
- Hwy. 399 (J. Earle Bowden Way)
 - establish formal park entry at West and East ends (photo pull-off & entrance sign, entrance station gated & staffed during nesting season)
 - Opal Beach roundabout
- Speed humps (3 on Hwy. 399, 1 on Ft. Pickens Road)

Education

- Established Education Specialist position to develop curriculum-based on-site and outreach education program
- Establishing Research Learning Center to implement curriculum-based education program to include lessons on shorebirds & nesting concerns
- Media: newspaper articles, TV and radio interviews featuring Park Supt.
- “Your Speed Matters” rack cards distributed at Ft. Pickens entrance station and by interpretive staff
- Hire interpretive staff for nesting season, assigned specifically to provide visitors with information on shorebird nesting, road mortality, and the rationale for compliance with 20 mph speed limits (position requested and funded as part of BP funded NRDA shorebird habitat restoration project)

- Feature articles in park newspaper on shorebird nesting season emphasizing nesting closures and 20 mph speed limits

Enforcement

- Direct LE rangers to devote additional time and attention to enforcing nesting closure areas, 20 mph speed limits, and no passing zones
- Hire additional seasonal LE rangers during shorebird nesting season to focus on enforcing nesting closure areas, 20 mph speed limits, and no passing zones

Additional Options Under Evaluation

- Hire off-duty officers (County Deputies, FL FWC) to provide additional enforcement of 20 mph speed limits and no passing zones during nesting season
- Permanent solar powered radar speed limit signs
- Consider 25 mph for entire Ft. Pickens and Santa Rosa Areas instead of a mix of 20 mph and 35 mph areas
- Develop “Chick magnets” to hand out to visitors (“Save a chick, Drive 25”)
- Roundabouts at all parking lot entrances (convert 2-entrance pull-through design to a single entrance accessible by roundabout): Hwy. 399 lots #1, 7, 8, Ft. Pickens Road lots #21, 22
- Additional speed humps
- Automated cameras & contract for tickets by mail

**ENVIRONMENTAL ASSESSMENT
FOR THE FORT PICKENS ROAD REALIGNMENT**

ERRATA

The following changes have been made to the Environmental Assessment (EA) for the *Fort Pickens Road Realignment, July 2014*.

General Changes:

Throughout the EA, Parking Lot #22 has been identified to be relocated adjacent to the new road realignment. Based on consultations with the U.S. Fish and Wildlife Service (USFWS) and the Florida Fish and Wildlife Conservation Commission (FWC) on August 29, 2014; and comments received during the EA public review period, Parking Lot #22 will now remain in its existing location. The proposed Fort Pickens Road realignment will be reconfigured to meet the existing road alignment in the vicinity of the eastern Parking Lot #22 entrance. These changes are in response to concerns expressed regarding shorebird habitat and visitor water access. As a result, the approximate project totals have been revised to the following:

Total project length = 4.34 miles
Total realignment length = 1.5 5miles
Total repavement length = 2.79 miles
Length of existing section to be demolished = 1.38 miles

As required by National Park Service (NPS) Director's Order 12, the following errata sheets respond to all substantive comments submitted on the Environmental Assessment (EA) for the Fort Pickens Road Realignment.

Substantive comments from various individuals and organizations have been consolidated and paraphrased for purposes of this document. The comments, with NPS' responses, are set forth below.

1. Comment – NPS did not fully analyze alternatives considered but dismissed, including the use of protective berms, beach renourishment, and dune enhancement.

The NPS reconsidered the alternatives that were developed for the *2006 Environmental Assessment to Restore Visitor Access to Fort Pickens Area, Santa Rosa Island (2006 EA)*. In the 2006 EA, the alternatives that were analyzed included the reconstruction of Fort Pickens Road with protective sand berms (Alternative C), and the reconstruction of Fort Pickens Road in conjunction with beach renourishment and dune enhancement (Alternative E). These alternatives were analyzed in detail within the EA, but were not selected as the preferred alternative. The preferred alternative selected in the 2006 EA was carried forward as the preferred alternative in this EA.

2. Comment – Commenters suggested the use of alternative substrates for the Fort Pickens Road realignment project. Proposed alternative substrates included the following: limestone, concrete, shell, general pervious material, and military road grade.

The use of alternative substrates for the Fort Pickens Road realignment project was dismissed because the use of such materials is not feasible. The use of alternative substrates was considered in the 2006 EA. Alternative road surfaces do not meet Federal Highways and Federal Department of Transportation design standards. Also, the U.S. Fish and Wildlife Service has expressed concern that shell scatter and foreign materials could have adverse impacts on special status species. Limestone and oyster shell are also a more expensive substrate. In 2006, a Value Analysis was completed for the Reconstruction of the Santa Rosa and Fort Pickens Roads from Hurricane Damage which included an analysis of other materials and surfaces for the road. The use of shell would require more frequent maintenance from the national seashore staff and would require 90 days or more to repair if future damage were to occur. Shell is also not locally available; therefore, shell would need to be purchased and imported to the national seashore, which increases the cost of the project.

3. Comment - An elevated concrete piling roadway was suggested as an alternative to the proposed Fort Pickens Road realignment.

The construction of a land bridge with some realignment and protective measures was considered but dismissed in the 2006 EA. This alternative would involve reconstructing the Fort Pickens Road on pilings for the length of the island. It was dismissed due to being cost prohibitive, as well as physical dynamics and the impacts that individual pilings would have on natural processes. This alternative was also evaluated in the 2006 Value Analysis. Resource issues identified during the Value Analysis included allowing water to migrate, sand source and movement, pile impacts, low edge, large footprint, archeological, runoff, minimal flow block, different scour, and over wash.

4. Comment – If Parking Lot 22 is moved, it will make access to the water more difficult.

Based on consultations with the USFWS, Florida FWC, and comments received during the EA public review period, Parking Lot #22 will now remain in its existing location. The proposed Fort Pickens Road realignment will be reconfigured to meet the existing road alignment in the vicinity of the eastern Parking Lot #22 entrance. These changes are in response to concerns expressed regarding shorebird habitat and visitor water access.

5. Comment - Regardless of where the Fort Pickens Road is relocated to, it will still be subject to damage from adverse weather and flooding conditions in the future.

The EA analyzes all alternatives deemed feasible given the purpose and need for the project, as well as such factors as funding constraints, the need to connect local communities with the Fort, etc. The preferred alternative calls for what amounts to be a sacrificial road. By moving the road inland, less damage is expected from storms producing high winds and flooding conditions, which would ultimately increase the road longevity and maintenance when compared to its current location. NPS recognizes that the realigned Fort Pickens Road would not be hurricane proof.

6. Comment - A waiver from NPS Management Policy Section 4.8.1.1 or a further study to show that the 4.8.1.1 criteria are met is required for Alternative B because of its effects on the coastal environment.

Section 4.8.1.1 of NPS Management Policy 2006 states that natural shoreline processes (such as erosion, deposition, dune formation, overwash, inlet formation, and shoreline migration) will be allowed to continue without interference. It further states that new developments will not be placed in areas subject

to wave erosion or active shoreline processes unless (1) the development is required by law; or (2) the development is essential to meet the park's purposes, as defined by its establishing act or proclamation, and no practicable alternative locations are available; the development will be reasonably assured of surviving during its planned life span without the need for shoreline control measures; and steps will be taken to minimize safety hazards and harm to property and natural resources. If the preferred alternative is not implemented, storm events would continue to erode the roadway, resulting in future situations where conditions become so altered that it is no longer feasible to repair or maintain the road. If road repairs are not feasible, Fort Pickens Road would be closed and access to the area would no longer be permitted by vehicle. As a result, visitors would not be able to access national seashore amenities at the western portion of the island, such as the fort, artillery batteries, visitor center, and camping areas by vehicle; although boat access would be possible. The Fort Pickens Road Realignment is needed to meet the park's purpose to provide for public use and enjoyment of the Gulf Coast barrier island and bayou ecosystem and its system of coastal defense fortifications.

7. Comment – The Fort Pickens Road realignment could have negative impacts on special status species including the Perdido Key beach mouse, piping plover, snowy plover, least tern, and loggerhead sea turtle; a more thorough analysis of the potential impacts is required. Additional reports are needed before the Fort Pickens Road project can continue, including a Biological Assessment, Jeopardy Analysis, and Environmental Impact Statement.

NPS notified the USFWS that it intended to use the EA as a Biological Assessment. When the road realignment was designed, thought went into how the road would be placed so as to protect special status species to the extent possible. The current Fort Pickens Road is located within nesting shorebird habitat and the proposed road will also be located within this habitat.

Consultation between the NPS and USFWS, National Marine Fisheries Service (NMFS), and the Florida Fish and Wildlife Conservation Commission (Florida FWC) occurred during the scoping process. Information about the proposed project was included in consultation letters to the agencies sent on April 23, 2014.

A response was received from the Florida FWC on June 5, 2014. The Florida FWC expressed concern about the impact of the proposed alignment to snowy plovers (*Charadrius alexandrinus tenuirostris*) and least terns (*Stena antillarum*). A response was also received from the USFWS on May 30, 2014 that expressed concerns about impacts to listed species from the proposal, including the snowy plover, least tern, and piping plover (*Charadrius melodus*). A May 8, 2014 letter received from the NMFS noted no adverse effect to ESA listed species or critical habitat from the proposed project.

A copy of the EA was also provided to USFWS, NMFS, and Florida FWC on July 23, 2014 for review and comment. NPS determined that the proposed project may affect, not likely to adversely affect federally listed species occurring within the area. USFWS and NMFS reviewed NPS determinations and determined whether the action would result in jeopardy of individual species. In a letter dated September 17, 2014, USFWS concurred with NPS determination that the proposed project may affect, but is not likely to adversely affect the loggerhead sea turtle (*Caretta caretta*), green sea turtle (*Chelonia mydas*), leatherback sea turtle (*Dermochelys coriacea*), Kemp's ridley sea turtle (*Lepidochelys kempii*), and piping plover (*Charadrius melodus*).

The selected alternative does not constitute an action that normally requires preparation of an Environmental Impact Statement (EIS). As determined in the attached FONSI, the selected alternative will not have a significant adverse effect on the human environment. There are no adverse effects to physical resources, water resources, natural resources, cultural resources, or other unique resources within the region. No highly uncertain or controversial impacts, unique or unknown risks, or known cumulative effects were identified.

8. Comment – The EA did not include a summary of cost estimates for each alternative, and this is necessary.

A Value Analysis Study was conducted from January 24 – 26, 2006, for the 2006 EA. The Value Analysis team reviewed all the potential options and developed six viable alternatives for consideration. The six alternatives were evaluated using the Choosing by Advantages (CBA) Value Analysis method with their initial costs included. The selected alternative was analyzed along with other proposed methods including alternative transportation, dune protection, mix of protection, land bridge, and the use of alternative surfaces. The selected alternative was the least expensive, viable alternative and was carried forward as the preferred alternative in this effort.

9. Comment – One of the goals of the Fort Pickens Road realignment is to “provide safe access to Fort Pickens area,” but the Gulf Islands National Seashore Ferry Project would also bring people to the national seashore. The Ferry Project’s capacity to bring visitors to the park should be evaluated before the Fort Pickens Road realignment is considered further.

The Gulf Islands National Seashore Ferry project would fund the purchase of up to three pedestrian visitor ferries for use between the City of Pensacola, Pensacola Beach, and the Fort Pickens area of Gulf Islands National Seashore in Florida. A viable ferry service to this area of the national seashore would provide an alternative means of visitor access to the park. An Environmental Impact Statement for the passenger ferry project was completed in September 2014. The 2014 Pensacola Bay Ferry Service Ferry and Shuttle Transportation Feasibility Study used the figure of 700,000 annual visitors to Ft Pickens, and estimated that 60,000 might ride the Ferry. Some of these might replace car trips, but some would be people seeking the water experience.

10. Comment – Rather than invasive species management, wetland mitigation should include re-vegetation, restoration, or conservation of other wetland areas at Gulf Islands National Seashore.

For this project, the estimated direct impacts to wetlands is estimated at 0.065 acre, while indirect impacts to wetlands would total 0.069 of an acre, for a total of 0.134 acre of wetland impacts that require mitigation. Whenever possible, every effort is made to assure that the wetland restoration proposal meets the compensation requirements of both the NPS and the U.S. Army Corps of Engineers (USACE) processes to avoid any duplication of effort. Wetland compensation would include invasive plant species control in existing wetland areas within the wetland survey area delineated at the national seashore. Following discussions with the NPS Regional Wetlands Ecologist for the Southeast Region, wetland mitigation for this project is proposed at a 3:1 ratio, corresponding to invasive species treatment of 0.402 acre. Invasive plant species can decrease native plant diversity and disrupt ecosystems. As a result, invasive species control is proposed throughout the park to improve existing wetland functions and values. NPS will apply for a Section 404 permit for this project. USACE will review the proposed

mitigation and will determine if invasive species treatment is sufficient. The need for mitigation may be waived since less than 0.10 acres of wetlands would be directly affected by the proposed project.

ENVIRONMENTAL ASSESSMENT FOR THE FORT PICKENS ROAD REALIGNMENT

NON-IMPAIRMENT DETERMINATION

Why is a Non-Impairment Determination Required:

Section 1.4.7 of *Management Policies 2006* states that:

[b]efore approving a proposed action that could lead to an impairment of park resources and values, an NPS decision-maker must consider the impacts of the proposed action and determine, in writing, that the activity will not lead to an impairment of park resources and values.

Actions that require preparation of Environmental Assessments (EAs) and Environmental Impact Statements (EISs) constitute actions that may have the potential to impair park resources or values. Therefore, a non-impairment determination must be made for any action selected in a Finding of No Significant Impact (FONSI) or Record of Decision (ROD) that could impact park resources and values and to which the NPS is a signatory. The non-impairment determination is completed only for the selected action.

What is Impairment?

Sections 1.4.5 and 1.4.6 of *Management Policies 2006* provide an explanation of impairment. Section 1.4.5 defines impairment as:

an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values.

Section 1.4.5 goes on to state that:

[a]n impact to any park resource or value may, but does not necessarily, constitute impairment. An impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

- Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park
- Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
- Identified as a goal in the park's general management plan or other relevant NPS planning documents as being of significance.

An impact would be less likely to constitute an impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated.

Section 1.4.6 of *Management Policies 2006* identifies the park resources and values that are subject to the no-impairment standard:

The ‘park resources and values’ that are subject to the no-impairment standard include:

- the park's scenery, natural and historic objects, and wildlife, and the processes and condition that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structure, and objects; museum collections; and native plants and animals;
- appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;
- the park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and
- any additional attributes encompassed by the specific values and purposes for which the park was established.

How is a Non-Impairment Determination Made?

Section 1.4.7 of *Management Policies 2006* states that

"[I]n making a determination of whether there would be an impairment, an NPS decision maker must use his or her professional judgment. This means that the decision-maker must consider any environmental assessments or environmental impact statements required by the National Environmental Policy Act of 1969 (NEPA); consultations required under Section 106 of the National Historic Preservation Act (NHPA); relevant scientific and scholarly studies; advice or insights offered by subject matter experts and others who have relevant knowledge or experience; and the results of civic engagement and public involvement activities relating to the decision.

Management Policies 2006 further define "professional judgment" as

"a decision or opinion that is shaped by study and analysis and full consideration of all the relevant facts, and that takes into account the decision-maker's education, training, and experience; advice or insights offered by subject matter experts and others who

have relevant knowledge and experience; good science and scholarship; and, whenever appropriate, the results of civic engagement and public involvement activities relation to the decision.

How is a Written Non-Impairment Determination Prepared?

This determination on impairment has been prepared for the preferred alternative described on pages 13 and 14 of the EA. An impairment determination is made for all resource impact topics analyzed for the preferred alternative. An impairment determination is not made for soundscapes, socioeconomics, transportation, health and safety, visitor use and experience, and park operations because impairment findings relate back to park resources and values, and these impact areas are not generally considered to be park resources or values according to the Organic Act, and cannot be impaired in the same way that an action can impair park resources and values.

Soils

Soils in the national seashore include deposits that are mainly quartz; Santa Rosa Island is approximately 99 percent median-grained quart sand (NPS 2014a). The soils within the Fort Pickens Road realignment project area are largely sand soils, and soils associated with dune ecosystems. In the area of the entrance station, the parking lots, and along much of the reconfigured road areas, the soils are associated with the Corolla-Duckston sands, gently undulating and flooded. The Newhan-Corolla complex, rolling and rarely flooded, is also crossed by some portions of the road and the existing parking lot. In the dunes in proximity to the proposed road realignment, Dirego muck, tidal soils are present. Construction activities associated with the realignment of the road and entrance station reconfiguration will have long-term, minor, adverse impacts on soils within the project area. Construction activities will disrupt and compact soils within the proposed road realignment and areas for proposed reconfiguration. The removal of the existing road alignment will have beneficial effects on soils, as the area will be allowed to return to natural conditions and this area will not be subjected to continued road maintenance in the future. Although the selected alternative will have a permanent impact on the soil function, the impact will be limited to the realignment and reconfiguration areas within the project area. Since the selected alternative will not inhibit the park's ability to protect the natural processes of the terrestrial ecosystem and resources, including soils, the alternative will not result in an overall impairment of soils.

Coastal Zone and Coastal Barrier Resources System (CBRS) Areas

The project area for the Fort Pickens Road realignment is located within the coastal zone. In addition, the project area is also located within Coastal Barrier Resources System area FL-98P, which is an Otherwise Protected Area (OPA). OPAs are areas that are generally used for activities such as fish and wildlife refuges or research, and generally have boundaries that coincide with the boundaries of conservation or recreation areas (FEMA 2013; USFWS 2014a). Construction activities associated with the realignment of the road and entrance station reconfiguration will have adverse impacts on the coastal zone and CBRS areas from the alteration of the characteristics of these areas. The Coastal Zone Management Act requires that federal actions,

which are reasonably likely to affect land or water use, or natural resources of a state's coastal zone, be conducted in a manner that is consistent with the federally approved Coastal Management Program. The NPS has determined the project is expected to be consistent to the maximum extent practicable with the Florida Coastal Management Program (FCMP). The construction of the proposed road realignment will have adverse impacts on the OPA; however, the removal of the existing road will have beneficial impacts to the character of the OPA. In a letter dated October 1, 2014, the Florida Department of Environmental Protection stated that the proposed project is consistent with the FCMP. Because the proposed project will be in compliance with the FCMP, and the overall impacts to the CBRS areas will be long-term and negligible from the construction in the OPA area, the selected alternative will not result in impairment.

Floodplains

The existing road, entrance station, and proposed road realignment are all located within the 100-year floodplain. Construction of the new realigned road will disrupt floodplain functions and values, resulting in long-term minor adverse impacts in a localized area. However, the removal of the existing road alignment and restoration of this area will have a beneficial impact on the floodplain by allowing this area to return to natural conditions. When these actions are considered together, the selected alternative will result in negligible adverse impacts to the floodplain. The introduction of an impervious surface will alter the floodplain in a localized area, but the removal of the existing road will minimize overall impacts. Impacts will not inhibit the ability of the park to conserve and protect natural resources. Therefore, impacts to the floodplain as a result of construction will not result in overall impairment of floodplains.

Wetlands

Three wetlands are located within the 100-ft buffer of the proposed road realignment (Wetland 1, 2 and 3). Wetland 1 is characterized as an estuarine, intertidal, emergent, persistent, irregularly flooded wetland (E2EM1P), located along the western portion of the proposed roadway and partially within the 100-foot buffer. The portion of wetland that lies within the project area totals 0.102 acre. Wetland 2 is characterized as an estuarine, intertidal, scrub-shrub, broad-leaved deciduous, irregularly flooded wetland (E2SS1P), located along the western portion of the proposed roadway and partially within the 100-foot buffer. The portion of wetland that lies within the project area totals 0.030 acre. Characterized as an E2EM1P, Wetland 3 is located along the central portion of the proposed roadway and partially within the 100-foot buffer. The portion of wetland that lies within the project area totals 0.005 acre. Although wetlands 1, 2, and 3 are located within the 100-foot boundary, they are not located within the proposed road realignment. Construction activities will occur only within the footprint of the proposed road realignment (30 feet); as a result there will be no impact to wetlands 1, 2, and 3 under the selected alternative.

One wetland (Wetland 6) is located along the eastern portion of the proposed roadway and partially within the 100-foot buffer, and within the proposed roadway. Wetland 6 is characterized as an E2EM1P wetland. The portion of Wetland 6 that lies within the project area totals 0.199 acre in the 100-foot buffer and 0.065 acre within the proposed road realignment. Construction activities will occur only within the footprint of the proposed road realignment. There will be no

impact to the portion of Wetland 6 located to the north of the proposed road realignment under the selected alternative, which will remain connected to the extended portion of wetland 6 outside the 100-foot buffer. However, a portion of wetland 6 (0.069 acres) to the south of the proposed roadway will be isolated hydrologically by the roadway, resulting in indirect impacts as this wetland could be potentially lost. Approximately 0.065 acre of Wetland 6 is located within the 30-foot proposed roadway footprint. Therefore, a total of 0.065 acre of wetlands will be permanently and directly impacted under the selected alternative. Construction may alter the functions and values of Wetland 6 within the roadway footprint. Construction activities and equipment may have permanent impacts on the values of this wetland, including wildlife habitat, recreation and tourism, and visual/aesthetic values, as well as on the functions of these wetlands, which are primarily flood attenuation/alteration and sediment/shoreline stabilization. Construction can result in the removal of hydrophytic vegetation and other vegetation, as well as the excavation of soils; though this will be minimized to the greatest extent possible.

Wetland impacts will be mitigated at a proposed 3:1 ratio. Wetland mitigation will include the treatment of 0.402 acres of invasive species. Invasive plant species can decrease native plant diversity and disrupt ecosystems. The proposed wetland mitigation will improve the overall functionality and values in wetlands within the project area at the national seashore.

Although 0.065 acres of direct impacts will occur from the Fort Pickens Road Realignment, the proposed wetland mitigation will improve the overall functionality and values in wetlands throughout the park. Impacts will not inhibit the ability of the park to conserve and protect natural resources. Therefore, impacts to wetlands as a result of construction will not result in overall impairment of wetlands.

Vegetation

Vegetated habitats found within the project area of the national seashore include beach dune, coastal strand, estuarine emergent wetlands, and estuarine scrub-shrub wetlands. Under the selected alternative, vegetation clearing will be needed for the construction of the road realignment, and entrance and parking lot reconfigurations, but this clearing will be localized resulting in long-term minor adverse impacts. Short-term, minor adverse impacts will result from the potential damage to vegetation from the construction equipment. Following construction, damaged vegetation will be replanted and restored. The removal of the existing roadway will have beneficial impacts on vegetation, as the area will be restored back to natural conditions, and vegetation will be naturally reestablished. Although the selected alternative will have a permanent impact on some vegetation, the impact will be limited to the realignment and reconfiguration areas within the project area. Since the selected alternative will not inhibit the park's ability to protect the natural processes of the terrestrial ecosystem and resources, including vegetation, the alternative will not result in an overall impairment of vegetation.

Wildlife

The Fort Pickens area of the national seashore is inhabited by several smaller species of mammals including raccoon (*Procyon lotor*), gray fox (*Urocyon cinereoargenteus*), and the Santa Rosa beach mouse (*Peromyscus polionotus leucocephalus*). Non-native mammal species in this area

include coyote (*Canis latrans*), armadillo (*Dasyus novemcinctus*), opossum (*Didelphis virginiana*), and red fox (*Vulpes vulpes*). The national seashore is home to over 280 species of birds. These bird species use the islands for loafing, feeding, nesting, wintering, and migration. Some species are permanent residents but many are migratory or breeding and may spend only a portion of the year within the national seashore. Several species of shorebirds nest in the national seashore, and the NPS implements seasonal closures to protect nesting shorebirds from human disturbance. Nesting bird species that nest in the vicinity of the project site in the Fort Pickens area include, Wilson's plover (*Charadrius wilsonia*), common nighthawk (*Chordeiles minor*), killdeer (*Charadrius vociferous*), gull-billed terns (*Gelochelidon nilotica*), and osprey (*Pandion haliaetus*). Common reptiles and amphibians occurring within the Fort Pickens area include green treefrog (*Hyla cinerea*), squirrel treefrog (*Hyla squirella*), American alligator (*Alligator mississippiensis*), chicken turtle (*Deirochelys reticularia*), green anole (*Anolis carolinensis*), six-lined racerunner (*Cnemidophorus sexlineatus*), Mediterranean gecko (*Hemidactylus turcicus*), glass lizard (*Ophisarus* sp.), banded water snake (*Nerodia fasciata fasciata*), and eastern ribbon snake (*Thamnophis sauritus sauritus*).

Wildlife within the Fort Pickens area will be impacted during construction activities through disturbance of wildlife sand dune habitat. Disturbance of feeding, foraging, and nesting of local species, including shorebirds will occur from noise associated with construction equipment, as well as the presence of construction workers. Disturbances to the Santa Rosa beach mouse during construction are also expected to occur, although this species is nocturnal and will likely only be active at night. Removal of vegetation could also result in disturbance of wildlife species, and the removal of vegetation for the roadway could remove or diminish the habitat for wildlife species. Construction impacts on shorebirds will be minimized by restricting construction to months outside of shorebird nesting season. Once construction is complete and Fort Pickens Road is realigned, it is generally expected that shorebirds and other wildlife in the area will relocate nesting, foraging, and other activities to areas away from the new road alignment. It is also anticipated that wildlife will begin to use the new habitat created from the old road alignment, which will be allowed to naturally restore to previous conditions.

The current road alignment is inhibiting the southern end of the primary dune line. With the removal of the current road, a more complete primary dune line will form and the area where the current road is located will develop in to primary dune habitat. This additional primary dune habitat will provide some benefits for the Santa Rosa beach mouse and other wildlife species. A portion of the existing road area will also create some areas of open beach, which could benefit shorebird species.

Mortality of wildlife species along the roadway, including the Santa Rosa beach mouse and passerine bird species, is likely to continue along the proposed road realignment, and is anticipated to be similar to current rates of mortality. Efforts to reduce mortality to the Santa Rosa beach mouse and other wildlife species will include those currently in place at the national seashore, such as speed limit signs, radar speed signs, enforcement of speed limits, and educational efforts. Also, the proposed road will have added curves designed to avoid dune habitat, which will naturally cause motorists to slow down.

Overall, the selected alternative will have short-term moderate adverse impacts to wildlife during construction and minor adverse impacts on wildlife in the long term due to the potential for mortality on the roadway. Impacts to wildlife within the Fort Pickens area will be limited to the road realignment area. It is anticipated that wildlife will continue to use the Fort Pickens area for feeding, foraging, and nesting. Since the selected alternative will not inhibit the park's ability to protect the natural processes of the terrestrial ecosystem and resources, including wildlife, the selected alternative will not result in an overall impairment of wildlife.

Special Status Species

Four species of federally listed sea turtles have been documented nesting at the national seashore and include the loggerhead, green, leatherback, and Kemp's Ridley turtles. Currently, sea turtles have been nesting along the roadway proposed for realignment. In 2013, a loggerhead sea turtle was struck and killed by a vehicle along Highway 399 in the Santa Rosa area of the national seashore, and sea turtle mortality along Fort Pickens Road is a possibility. It is unlikely that the selected alternative will impact sea turtles directly through disturbance during construction activities. All construction activities will be completed outside of the sea turtle nesting season, thus limiting any impacts on sea turtles. The realignment of Fort Pickens Road out of sea turtle habitat will have long-term beneficial impacts on sea turtle species, corresponding to a "may affect, not likely to adversely affect" impact under section 7 of the ESA.

The national seashore supports numerous ground nesting shorebirds, including the state threatened snowy plover and least tern. A shorebird nesting area is located within the proposed road realignment and 21 snowy plover nests were documented in sandy, dune habitat in the vicinity of the proposed roadway in 2012 and 2013. Ground nesting shorebirds utilize habitat at the national seashore from about March until August, when nesting is complete. All construction activities will be completed outside of the snowy plover nesting season, thus limiting any impacts on ground nesting shorebirds. Although the proposed realignment of Fort Pickens Road is within an area with documented snowy plover nests, this species is anticipated to nest in the area where the current alignment of Fort Pickens will be removed. With the removal of the existing road, a more complete primary dune line will form, and the area where the existing road is located will develop in to primary dune habitat. Additionally, a portion of the existing road area will be converted into areas of open beach, which will benefit shorebird species. This will create nesting habitat for the snowy plover from the primary dunes down to the wrack line, as snowy plovers nest on the upper beach down to the wrack line. Least terns could also nest in this area. Listed shorebird species will still be at risk from the potential for vehicle strikes along the new roadway reconfiguration. Efforts to prevent shorebird mortality along Fort Pickens Road will include measures currently in place, such as speed limits along Fort Pickens Road, the use of radar signs displaying vehicle speed, enforcement, and education. Also, the proposed road will have added curves designed to avoid dune habitat. The additional curves will also cause motorists to slow down. Overall impacts to the state-listed shorebirds will be not likely to adversely impact.

The federally-listed piping plover is rarely sited in the Fort Pickens area, and roosting and feeding habitat are not located within the project area or in the three ponds area where the proposed road alignment will be located. Overall, the selected alternative will result in a negligible impact to the

piping plover. Although this shorebird is unlikely to occur within the project area since no roosting or feeding habitat occurs in this area, one instance of mortality to this species has been recorded in the project area and could occur in the future. It is possible that the selected alternative could affect an individual piping plover, but this occurrence will be rare and will not affect their habitat, population, or the natural processes sustaining them; the effects will be limited and localized. This impact intensity will equate to a determination of “may affect, not likely to adversely affect” under section 7 of the ESA.

The selected alternative will benefit nesting sea turtles and shorebirds. The opportunity for a shorebird to be struck by a vehicle on the road will continue to exist, but the risk will not increase over current conditions. Since the selected alternative will not inhibit the park’s ability to protect the natural processes of the terrestrial ecosystem and resources, including special status species, the alternative will not result in an overall impairment of special status.