



National Park Service
U.S. Department of the Interior
San Juan Island National Historical Park
Washington

Replace American Camp Temporary Visitor Center

Environmental Assessment

November 2018

INTRODUCTION

The National Park Service (NPS) is proposing to improve the facilities at the American Camp visitor center site within San Juan Island National Historical Park. The proposed project entails the replacement of the 39 year-old “temporary” visitor center with a new facility that would highlight the rich cultural history of the area as well as the spectacular natural setting of American Camp. The new visitor center would include space for visitor orientation, cooperating association sales, seating for an updated audiovisual program, and fully accessible exhibits and public restrooms. It would also include office and storage space for staff. Site improvements would include an outdoor interpretive plaza, demonstration space, gathering space, accessible pathways, more efficient parking, and replacement of the septic system and picnic sites.

In addition, the visitor center entrance road would be relocated just north of its existing intersection with Cattle Point Road. Park operational facilities, including administrative campsites and a maintenance storage area, would be redesigned along the section of the existing entrance road alignment that would no longer serve as road access to the visitor center.

This environmental assessment (EA) is tiered off of the San Juan Island National Historical Park 2008 *Final General Management Plan and Environmental Impact Statement* (GMP). The GMP emphasizes the connections and interrelationships between the park’s cultural and natural resources and proposed new facilities and programs that would provide opportunities for visitors to understand how the park’s natural surroundings influenced the settlement and historic events on San Juan Island and helped define the cultural landscapes preserved within the park. The GMP specifically identifies the replacement of the American Camp visitor center with a permanent facility.

This EA has been prepared in accordance with the National Environmental Policy Act and its implementing regulations (40 CFR 1500–1508) and Director’s Order 12: Conservation Planning, Environmental Impact Analysis, and Decision-making (NPS 2015a) and its accompanying handbook (NPS 2015b) to assess the alternatives and their impacts on the environment in addition to the coordinated the requirements of National Historic Preservation Act (NHPA) Section 106 with the NEPA process. The EA examines two alternatives: a no-action alternative

(alternative 1), and the proposed action (alternative 2) to improve the facilities at the American Camp visitor center site.

PURPOSE AND NEED

The existing American Camp visitor center is a double-wide prefabricated trailer installed in 1979 as a temporary facility to serve for three years until a permanent visitor center could be built (Figure 1). The purpose of this proposed project is to replace the antiquated trailer with new facilities that would greatly enhance public health and safety, as well as the visitor experience and understanding of the cultural and natural setting of American Camp and its regional context, to provide additional park operational facilities, and to improve the safety of the entrance road and the visitor arrival experience.



Figure 1. American Camp Visitor Center

Project Objectives

- Design visitor facilities to reflect their cultural and environmental setting and to effectively convey park information even when the visitor center is not staffed
- Construct a more efficient, code compliant, and sustainable visitor center
- Enhance public health and safety
- Update and expand interpretive exhibits
- Construct an outdoor interpretation plaza and demonstration area
- Accommodate existing and projected use levels on site
- Provide full accessibility for programs and facilities
- Incorporate energy-saving technologies and materials
- Accommodate office and storage space within the visitor center
- Improve safety and clarity of the entrance road/Cattle Point Road intersection and access route
- Separate visitor access route from the park operations area

- Increase administrative camping for Volunteers In Parks (VIPs), other volunteers, seasonal staff, or conservation work groups
- Minimize adverse effects on historic properties
- Minimize the removal of large mature trees

The proposed project is needed to address the deficiencies and limitations of the present visitor center and park operation facilities. The existing visitor center trailer is in poor condition, is inefficient to operate due to insufficient insulation, windows and doors, and does not meet building codes. Park management has invested very little funding into the maintenance of a temporary structure; the building currently has \$308,604 in the park's deferred maintenance inventory. The trailer is set on concrete blocks which are not tied together or side-braced and is not designed to meet local weather conditions. The building is located in a seismically active region and is also subject to high winds. Structural failure could displace the building off its supports causing significant damage to the structure and potentially injuring staff and visitors.

Additionally, the existing trailer has very limited space for interpretive exhibits, media, and storage. Although there is a ramp to the visitor center, the interior of the building is cramped, limiting accessibility, and the restrooms are not fully accessible. Furthermore, when the visitor center is not staffed and the building is closed, there is little opportunity for visitors to obtain adequate orientation and in-depth interpretation of the site.

The entrance road that leads to the visitor center is situated on a curve and is adjacent to subdivision access to the Eagle Cove Neighborhood (Figure 2). An "American Camp" sign is located prior to the turnoff for the visitor center; however, there is another intersection (Eagle Cove Drive) just before the sign. Visitors see the sign and immediately see Eagle Cove Drive and often turn at this location instead of at the road to the visitor center, which is located 150 feet after the Eagle Cove Drive intersection. Both of these intersections are located on the outside of a sharp curve, resulting in poor sight distance. These issues collectively create a hazardous situation.



Figure 2. Entrance road intersection along Cattle Point Road

American Camp does not have dedicated space for maintenance staff to support park operations. Currently maintenance equipment is stored either at the main maintenance yard at English Camp, in employee parking areas, or at the administrative area near the entrance to the visitor center. The administrative area consists of two administrative campsites with hook-ups (power, water, and sewer), and two small buildings used for resource management field work. Volunteers In Parks (VIPs), other volunteers, conservation work crews, and seasonal staff all use the area during the busy summer season. The concentrated use of the small administrative site creates congestion and intrusion into people's space during their time off, and the limited amount of camping sites does not meet the demand of the park operations in peak season.

SITE DESCRIPTION

San Juan Island National Historical Park is located on San Juan Island in Washington State. The park consists of two distinct units, American Camp (1,223 acres) and English Camp (915 acres). This project takes place within the American Camp unit, which is located approximately 5.8 miles south of the town of Friday Harbor. The American Camp unit includes an expanse of rare coastal prairie, coniferous forest, and marine shoreline. The marine ecosystems surrounding these units and their six miles of publicly accessible shoreline are renowned for their iconic scenery. In 2016, the diverse natural resources and historical significance of the park attracted 316,122 visitors.

American Camp is historically significant as the location of the U.S. Army camp during the 12-year occupation of the island by British and American troops. It was also significant to the Coast Salish and Straits people; the prairies were an important base for harvesting native plants and game, and the shorelines were optimal for fishing and collecting shellfish and other marine resources. American Camp features significant historic resources including three original military buildings, an earthwork redoubt, and numerous archeological sites. The cultural landscape also includes the Salish fishing village at the Salmon Banks, sites of the Hudson's

Bay Company agricultural outpost, Belle Vue Sheep Farm, and the European village of San Juan Town.

The American Camp visitor center site is located near the western boundary of American Camp at an elevation of approximately 200 feet. The project area encompasses an area surrounding the current visitor center and access road.

ISSUES AND IMPACT TOPICS

Issues and impact topics are identified and form the basis for environmental analysis in this EA. A brief rationale is provided for each issue or impact topic that is analyzed in the environmental consequences section. Issues and impact topics considered but not addressed in this document also are identified.

Impact Topics Retained for further Analysis

Historic Properties

American Camp is a National Historic Landmark (NHL) listed on the National Register of Historic Places (NHRP). The American Camp NHL is also a cultural landscape containing prehistoric and historic archeological sites within the boundaries. Proposed actions would take place within the NHL and could have an adverse effect on the cultural landscape and archeological resources. Therefore, this EA, in coordination the requirements of National Historic Preservation Act (NHPA) Section 106, fully considers and analyzes the potential impacts and adverse effects to historic properties within the park.

Bald Eagles

A bald eagle pair currently nests in a large Douglas fir tree near the existing visitor center. Bald eagles were removed from the federal Endangered Species list in 2007, and remain classified as a State Sensitive species in Washington. Although the eagle was delisted, it still receives protection under the Bald and Golden Eagle Protection Act, the Migratory Bird Treaty Act, and the Lacey Act. Therefore, this EA fully considers and analyzes the potential impacts that the alternatives could have on bald eagles.

Vegetation

Approximately 48 trees larger than 8 inches in diameter would be removed in order to accommodate the new visitor center, entrance road, and administrative area under alternative 2. Large trees are an important component of terrestrial habitat in the park, and their removal would impact natural habitat values. Therefore, this EA fully considers and analyzes the potential impacts that the alternatives could have on vegetation.

Wetlands

The proposed road realignment would impact nearby wetlands. Wetland resources and processes are important components of maintaining the ecological integrity of the park. All wetlands in national park units are protected and managed in accordance with Executive Order 11990, "Protection of Wetlands," *NPS Director's Order 77-1: Wetland Protection* and its accompanying handbook (NPS 2016), and *NPS Management Policies* (NPS 2006). Therefore, this EA fully considers and analyzes the potential impacts that the alternatives could have on wetlands.

Visitor Use and Experience

Visitor use and experience could be affected under alternative 1 by crowding, accessibility and safety issues, and limited interpretive opportunities. Under alternative 2, visitors could be impacted during project implementation by actions such as road and facility closures, as well as once the project is complete, by changes in access and other facility and interpretive improvements. Therefore, this EA fully considers and analyzes the potential impacts that the alternatives could have on visitor use and experience.

Impact Topics Considered and Dismissed from Further Analysis

Island Marble Butterfly

On April 12, 2018, the U.S. Fish and Wildlife Service proposed to list the island marble butterfly (*Euchloe ausonides insulanus*) as an endangered species and designate critical habitat under the Endangered Species Act of 1973. The proposed critical habitat is located within American Camp but also includes the adjacent portions of land to the east and west of the park. The habitat for the island marble butterfly consists of an open, treeless landscape that is found within the coastal prairies of American Camp. The island marble butterfly host plants within this landscape include one native and two non-native mustard plants in the Brassicaceae family.

The project area is located within and adjacent to the proposed critical habitat for the island marble butterfly, however, the proposed action is primarily centered within the forested portion of American Camp. To date, no host plants have been seen, nor have any island marble butterfly detections ever been verified in the areas currently considered for the new visitor center construction, administrative area, associated utilities, staging zones, or new road alignment. Island marble butterflies are low flying insects that typically traverse landscapes hovering just above the tall grasses. The large trees and dense shrubbery surrounding the proposed project area is believed to block fly ways that might otherwise be utilized. For these reasons, this project has been determined to have no foreseeable impacts on the island marble butterfly population at American Camp.

Environmental Justice

Presidential Executive Order 12898, General Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, requires all federal agencies to incorporate environmental justice into their missions by identifying and addressing the disproportionately high and/or adverse human health or environmental effects of their programs and policies on minorities and low-income populations and communities. According to the Environmental Protection Agency, environmental justice is 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 a 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 '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.

Environmental justice was considered but dismissed as an impact topic for the following reasons:

- During the environmental assessment process, the Park staff and planning team gave equal consideration to all input from persons regardless of age, race, income status, or other socioeconomic or demographic factors.
- Implementation of the proposed action would not result in either any identifiable adverse human health effects or in any identified effects that would be specific to a minority or low-income community.
- Any effects to the socioeconomic environment resulting from implementation of the proposed action would be beneficial.

Indian Trust Resources

Secretarial Order 3375 requires that any anticipated impacts to Indian trust resources from a proposed action by Department of Interior agencies be explicitly addressed in environmental documents. The federal Indian trust responsibility is a legally enforceable fiduciary obligation on the part of the United States to protect tribal lands, assets, resources, and treaty rights, and it represents a duty to carry out the mandates of federal law with respect to American Indian and Alaska Native tribes.

There are no identified Indian trust resources in San Juan Island National Historical Park. Therefore, Indian trust resources were dismissed as an impact topic.

ALTERNATIVES

The NPS considered numerous locations for the siting of the new American Camp visitor center, as well as several different road alignments for the entrance road. In addition to the no action alternative, one action alternative is discussed in detail in this chapter. The other alternatives were considered but dismissed from full analysis for the reasons presented in the section, Alternatives Considered but Dismissed.

ALTERNATIVE 1 – NO ACTION

Under the no action alternative, the American Camp visitor center facility would remain in place. No changes would be made to the building or the surrounding area, including parking and road alignment, and significant safety issues, deficiencies, and limitations would continue to be unaddressed under this alternative. Although this alternative does not meet the purpose and need of the project, its impacts are analyzed in order to compare the impacts that could result from continuation of current management under the no action alternative with those from implementation of the action alternative. See Figure 3 for the Alternative 1 site map.

ALTERNATIVE 2 – PROPOSED ACTION – REPLACE AMERICAN CAMP VISITOR CENTER

Under Alternative 2, the existing trailer would be removed and a new building would be constructed. The new building would cover portions of the existing footprint and extend to the north beyond the footprint. Traffic and pedestrian flows would be reconfigured, along with parking layouts. A new entrance road would be constructed. See Figure 4 for the Alternative 2 site map.

The double-wide trailer would be replaced with an approximate 2,200 square-foot permanent visitor center (Figure 5). The new facility would include space for visitor orientation; updated, expanded, and accessible exhibits; seating for an updated audiovisual program; cooperating association sales; and office and storage space for interpretive staff. Fully accessible public restrooms with an outside entrance, and a replacement septic system would be built.

The loop turnaround in the parking area would be adjusted to better handle bus turning movements, and additional parking would be created by regrading, repaving, and restriping of existing pavement. A bus drop-off zone would be added, and parallel parking for large vehicles would be provided within a pullout along the north side of the entry road near the exit. A trail would be built to connect the large vehicle parking area to the visitor center. Total passenger vehicle parking would be 30 spaces.

Existing pedestrian paths and trailheads would be redesigned to connect with an orientation plaza directly in front of the new building and an interpretation plaza and demonstration area would be built east of the parking loop. The existing employee parking lot would be converted into a picnic area, and a new trail, with additional picnic areas, would traverse through the forest south of the parking lot. An outdoor gathering space would be built to accommodate 30 - 40 people.

The visitor center entrance road along Cattle Point Road would be realigned, moving the entrance point approximately 400 feet to the north and its connection with the existing entry road approximately 350 feet to the east. The new road would be approximately 670 feet long with a 25-foot wide roadbed. The old entrance would be rehabilitated into a cul-de-sac. The monument sign at the entrance would be relocated to the new entrance point.

The existing administrative area would be redesigned and reconfigured to be used for maintenance and other park purposes. Specific designs have not been created; however, conceptual ideas highlight the potential for constructing new structures (approximately 800 to 1,000 square-feet each) to provide covered storage for maintenance equipment, climate controlled storage for living history materials and resource management supplies and equipment, and to provide space for volunteer laundry. One of the existing buildings would be renovated to provide work spaces for resource stewardship and support fieldwork operations. There would be adequate parking provided for work vehicles, as well as, necessary outdoor lighting for safety. The two existing administrative campsites would be removed, and up to six new administrative campsites with hook-ups (power, telecommunications, and septic) would be constructed, along with a new septic.

In order to complete the project, approximately 48 trees measuring greater than 8 inches in diameter would be removed in the vicinity of the new visitor center, entrance road, and administrative area. Following construction, all disturbed areas would be revegetated using native plant species. Revegetation would begin as soon as possible after completion of construction, during the optimum time of year to ensure greatest plant survival.

Project components would not be completed at the same time. The outdoor gathering space, forest picnic trail, and reconfiguration of the administrative area and campsites are not currently funded.

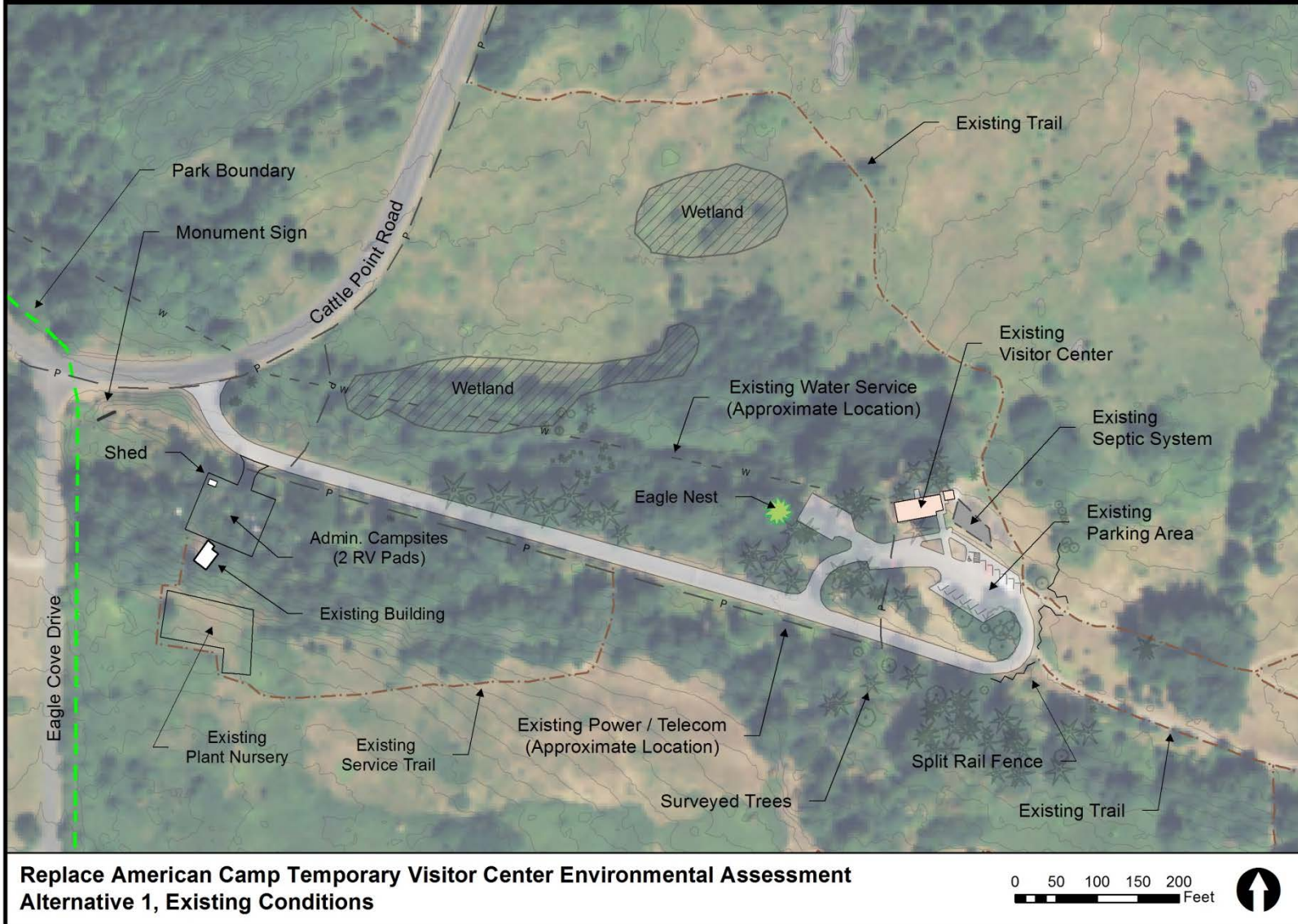


Figure 3. Alternative 1, Existing Conditions.



Replace American Camp Temporary Visitor Center Environmental Assessment
Alternative 2 Plan

0 50 100 150 200
Feet



Figure 4. Alternative 2 Site Plan



Figure 5. Conceptual design drawing for the proposed new American Camp Visitor Center. Image provided by OTAK, Inc.

MITIGATION

To help ensure that park projects protect natural, cultural, and social resources and the quality of the visitor experience, mitigation measures have been developed. The following section discusses mitigation measures that would occur prior to, during, and after construction.

Archeological resources

A Monitoring and Inadvertent Discovery Plan will be developed for this project. Construction activities that could result in ground disturbance would be monitored for undetected archeological resources. If previously undetected archeological resources are encountered during construction, work would stop in that location until the site is evaluated by a qualified archeologist. In the unlikely event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act (25 USC 3001) of 1990 would be followed. If non-Indian human remains were discovered, standard reporting procedures to the proper authorities would be followed, as would all applicable federal, state and local laws.

Cultural Landscape

Facilities and the realigned entrance road would be designed and constructed to avoid or minimize adverse effects on the cultural landscape. Facilities would be constructed in a way as to match the look, feeling, and design of the cultural landscape. As few trees as possible would be removed to retain the integrity of the remnant forest stand and limit visual intrusion into other areas of the cultural landscape.

Bald Eagles

To minimize disturbance to nesting bald eagles, the NPS, in consultation with the US Fish and Wildlife Service, developed the following mitigation measures:

1. Keep a distance between the project activity and the nest: the existing buffer distance between the nest and the new visitor center facilities would be maintained, and the construction staging area would be located at the far eastern side of the parking area, in order to be as far away from the nest as possible.
2. Maintain preferably forested (or natural) areas between the project activity and around nest trees: as few mature trees as possible including existing trees that provide screening between the nest and visitor center would be removed. The nest tree and immediately adjacent trees that provide existing canopy coverage would be protected.
3. Avoid certain activities during the breeding season: the loudest activities (excavation, tree removal, demolition, and construction) and those activities taking place closest to the nest would be initiated in the late summer or early fall, thus avoiding the nesting season (January through mid-August).

Migratory Birds

Vegetation removal would occur outside of the nesting season for migratory birds.

Vegetation

1. Removal. As few trees as possible shall be removed. Trees, limbs, and shrubs would be cut and trimmed according to best horticultural practice to protect the vegetation from disease and minimize the aesthetic impact.
2. Weed Control. Best Management Practices for weed control would be followed. Construction equipment would be cleaned prior to entering the park. All disturbed areas would be restored using native conserved topsoil and would be revegetated. Any imported topsoil or cover material (straw, hay) would be certified as weed free. Aggregate and fill material sources would be inspected and certified as weed free by a qualified person prior to approval for use. If weed-free sources are not available, material would be heat treated to kill weeds and weed seeds before application.

Wetlands

1. Construction within the wetland would be limited to the smallest area necessary and the construction limits clearly demarcated.
2. Measures would be employed to prevent or control spills of fuels, lubricants, or other contaminants from entering the wetland.
3. Erosion and sedimentation control measures would be placed prior to construction activities and maintained during construction.
4. Hydric soil material would be stored and reused at the site to the greatest extent practicable.
5. All disturbed soil and fill slopes would be stabilized and revegetated.
6. Equipment staging and storage of materials would be located in an upland area on the eastern end of the project area away from the wetlands. No equipment would drive through the wetlands beyond the footprint of construction during construction activities.

Visitor Use and Experience

1. During the construction period, operation of the English Camp visitor contact station would be expanded from approximately the beginning of May through the end of September, increasing its operational period an additional two months. During the shoulder and off-season, visitors would be directed and information enhanced at the headquarters building in Friday Harbor.
2. During the summer months, additional staff would be dedicated to American Camp to rove the historic grounds and trails to make personal visitor contacts, as capacity enables.
3. Should funding allow, a "mobile visitor center" would be created in a utility trailer at South Beach.

ALTERNATIVES DISMISSED FROM FURTHER ANALYSIS

Visitor Center Location

The NPS initially considered three sites for the location of the new American Camp visitor center. Potential sites included the existing visitor center location, an open landscape approximately 550 feet northwest of the existing visitor center, and an open landscape to the north of the redoubt, approximately 2,000 feet east of the existing visitor center site. During an internal scoping session in January 2017, park staff concluded that the existing visitor center location was the most practical and advantageous site; however, consideration for the specific

building location would not be restricted to the existing footprint. The other locations were dismissed because they would affect undeveloped areas and thus would have much greater environmental and cultural resource impacts and would be prohibitively expensive.

After narrowing down the preferred location to the existing visitor center site four potential sites were considered within the immediate area of the current visitor center. Three of these site options were also considered but dismissed. These include the existing building orientation and location, a location on the northeast side of the existing parking lot, and a location on the southeast side of the existing parking lot. All of these site options duplicated the function of alternative 2 included in the analysis and resulted in fewer benefits or greater adverse impacts than alternative 2. Thus the three other options within the immediate area of the current visitor center were dismissed from further consideration.

Entrance Road Realignment

The NPS considered five entrance road alignments. All of the five alignments begin in roughly the same location in order to maximize safety for the travelling public (the entrance location maximizes the sight distance for drivers turning onto Cattle Point Road and so travelers on Cattle Point Road can see vehicles entering the roadway). The alignments take varying routes to reach the visitor center, ranging from 652 feet long to 994 feet long.

All of these alignment options resulted in fewer benefits or greater adverse impacts than the alignment included in the analysis as part of Alternative 2. Other alignment options included longer more circuitous routes that would not separate visitor access from park administrative functions, would not provide a seamless visitor arrival experience, would be closest to the existing bald eagle nest, or would require greater tree removal, ground disturbance, and placement of fill material. For these reasons, the four other entrance road alignment options were dismissed from further analysis. Dismissed road alternatives are described in greater detail in the Statement of findings for Executive Order 11990 (Protection of Wetlands), Appendix A.

AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This chapter includes a discussion of the affected environment and environmental consequences. Each affected environment section describes the existing condition of the resources that could be impacted by implementing either of the alternatives. Each environmental consequences section describes how the existing condition of a resource would change, either negatively or positively, as a result of implementing either of the alternatives under consideration. A complete impact analysis includes the following three components:

1. A factual description of direct and indirect impacts (both adverse and beneficial).
2. A cumulative impact analysis. Cumulative impacts result from the “incremental impact of the action when added to other past, present, or reasonably foreseeable future actions, regardless of what agency (federal or nonfederal) or person undertakes such other actions” (40 CFR 1508.7).

3. A discussion of the importance of the impacts.

HISTORIC PROPERTIES

Affected Environment

The San Juan Island National Historical Park was established to commemorate historic events that occurred between 1853 and 1871 on the island in connection with the final settlement through peaceful arbitration of the Oregon Territory boundary dispute, including the so-called “Pig War” of 1859 to 1872; interpret and preserve the sites of the associated American and English encampments; and commemorate the peaceful relationship existing between the United States and Canada.

American Camp is a National Historic Landmark (NHL) and consists of a Historic District that features significant historic resources including an earthwork fortification, three original military buildings, numerous archeological sites, and a cultural landscape listed on the National Register of Historic Places (NRHP) under Criteria A, C, and D. In meeting Criterion A, the site is significant at the national level for its association with the border dispute and military standoff between the United States and Great Britain. The subsequent joint military occupation of the island preserved peace between the two countries for twelve years while a negotiated settlement could be reached. In meeting Criterion C, the site is significant at the national level as rare physical evidence of a mid-19th century American frontier military encampment. American Camp meets Criterion D with significance at the national level. A wealth of information about the design and methods of construction of the military encampment and the day-to-day life of the American soldiers has been gleaned through archeological investigations of the site. Many more resources, however, remain unexcavated, and American Camp retains the potential to yield further valuable information. The historic scene at American Camp evokes a strong sense of time and place. The site possesses good integrity of location, setting, feeling, and association through its unchanged relationship to the water, to its topography, and to the open rural character of southern San Juan Island.

In accordance with the procedures outlined by Section 106 of the National Historic Preservation Act (NHPA), an historic properties inventory was conducted in order to identify the absence or presence of cultural resources eligible for the NRHP within the identified Area of Potential Effects (APE). Historic properties within the APE include archeological resources and the cultural landscape.

Archeological Resources

During 2017, the National Park Service conducted an archeological assessment for the proposed visitor center and associated developments. The APE for this undertaking encompasses 23 acres and was developed based on areas that may be subjected to ground disturbance as well as anticipated indirect effects.

The assessment consisted of archival research, field survey, and resource documentation and evaluation for eligibility to the NRHP. Fieldwork included pedestrian survey and excavation of shovel probes across areas of proposed ground disturbance. Subsurface testing took place within roughly seven acres of the APE. One registered historic property, San Juan Island

National Historic Site (DT 154) is located within the APE. The APE is also located within the recorded American Camp Cultural Landscape (NPS 2004). One archeological site may be impacted by the proposed action. The Park archeologist recommends that the tested site is potentially eligible for listing as contributing elements of the American Camp Historic District under Criterion D as they have the potential to yield information about pre-contact land use, as well as, early homesteads on the island after the U.S. Army withdrew and the land was open to settlers.

Cultural Landscape

As identified by the National Park Service, cultural landscapes are places within U.S. national parks that have significance in American history and authenticity to a historic time period. Cultural landscapes are historically significant places that show evidence of human interaction with the physical environment. Their authenticity is measured by historical integrity, or the presence and condition of physical characteristics that remain from the historic period.

The APE is within the boundaries of the designated American Camp Cultural Landscape, which has been recorded as being in fair condition and retains integrity (NPS 2004). The site is significant as the location of a United States Army camp during the joint occupation of the island by British and American Troops from 1859 to 1874. As described in the cultural landscape inventory, six general landscape characteristics convey the physical character of the American Army military encampment during the period of significance (NPS 2004):

Natural systems and features – the peninsula of open prairie on the edge of a forest offered shelter from the northwest winds and timber for the camp's construction, and was proximate to open water.

Spatial organization – American Camp's location high on a ridge and proximity to two bays provided open views and easy access to the water. The spatial organization of the site also extends beyond the camp proper to include remnants of the Hudson Bay Company's nearby Bellevue Farm, the San Juan village site (the landing site for most troops and supplies), and the Spring Camp site, a second location temporarily inhabited by American troops. The historic spatial relationships between Bellevue Farm, San Juan village site, the Spring Camp site, and the American Camp compound itself, are evident today.

Buildings and structures – of the original thirty-four camp structures, two (the laundress' quarters and officers' quarters) have undergone restoration and remain today. An earthen fortification, the redoubt, also survives. In 2010, the National Park Service relocated the 19th century "Brown House" from Friday Harbor. The building is believed to be the historically documented Officer's Quarters (HS-10) or Hospital Steward's Quarters (HS-14) moved offsite after an auction in 1875. The building has been stabilized and rehabilitation of the building is proposed for 2020. None of the aforementioned buildings and structures is in the APE. The visitor center, restrooms, information kiosk, fire cache, Cattle Point Road, and parking area(s), are modern, non-contributing features of the cultural landscape.

Vegetation – the spatial dispersal of the forest cover and grassland has changed dramatically since the period of significance, due to logging, burning, farming and grazing, but the presence of dense forest adjacent to an open prairie influenced the siting and development of the

American Camp. Today, mature forest remnants around the visitor center and two remnant orchards near the former camp contribute to the significance of the landscape. The remnant orchards are outside the APE.

Views and vistas – expansive views from the camp provided clear visual access onto the bays. Mount Finlayson, east of the redoubt, is the highest point on the southern end of the island, and the view of this high point remains intact from the camp.

Archeological resources – see separate discussion above.

In addition, a number of small scale landscape features include the reconstructed compound fence, gate, and piles of rocks reflecting building foundations and field stones associated with agriculture. A small marble obelisk commemorating the American Camp also rests on a grass island in the visitor center parking lot. The original flag pole at the parade grounds, a small scale feature that contributed to the significance of the site, was replaced in 2011. The new flagpole is a noncontributing feature of the landscape. These small scale features retain integrity and contribute to the overall significance of the American Camp cultural landscape. With the exception of the marble obelisk, none of the small scale features are within the APE.

Impacts of Alternative 1

No construction would occur and there would be no effects to historic properties.

Impacts of Alternative 2

Archeological Resources

There are five archeological sites in the APE considered potentially eligible for listing in the NRHP. Four sites would remain unaffected by the proposed action. The outer portions of one site would be minimally disturbed by construction associated with the new visitor center, interpretive plaza, demonstration area, parking lot, and redesigned entrance road; however, the disturbance would not have an adverse effect on the National Register eligibility of the sites because there would be a negligible, if any, loss of archeological materials or reduction of contextual evidence associated with the sites.

Cultural Landscape

Impacts to the six landscape characteristics (natural systems and features, spatial organization, buildings and structures, vegetation, views and vistas, and archeological sites) that convey the physical character of the American Army military encampment during the period of significance, as described in the affected environment, are described below.

The proposed construction would have no effect upon the natural systems and features or spatial organization of the historic landscape. Likewise, none of the buildings and structures identified as contributing features of the cultural landscape (laundress' quarters, officers' quarters, and earthen fortification) is within the APE; therefore, there would be no effects to historic buildings and structures.

As described in the affected environment, the spatial dispersal of the forest cover and grassland in the cultural landscape has changed dramatically since the period of significance, due to logging, burning, farming and grazing. The remnant orchards near the American Camp parade

grounds are outside the APE and within the APE today, only the mature forest remnants around the visitor center contribute to the significance of the cultural landscape. Approximately 28 Douglas fir trees larger than 8 inches in diameter at breast height (DBH) would be removed within the remnant forest, ranging in size from 9 to 43 inches DBH. Of the 28 trees, seven would be removed to accommodate the new visitor center, nine would be removed to accommodate the new entrance road, and approximately 12 would be removed to accommodate the administrative area. Although this alternative would require the potential removal of 28 trees, the overall density and scale of the remnant forest would be little changed; thus the feature would retain the look and feel of forest and would be largely unnoticeable.

The expansive views from within the American Camp Cultural Landscape would remain unchanged. Views from other areas within American Camp to the new visitor center and associated development would be obscured by the undulating topography and tree line. There would be no diminishment of a visitor's appreciation and enjoyment of the historic views from within the American Camp Cultural Landscape. Any visual intrusions associated with construction activities, e.g. equipment operation and the hauling of material, would be temporary and negligible, lasting only as long as construction.

Prior to construction the commemorative marble obelisk in the visitor center parking lot would be disassembled and securely stored until it could be reinstalled following construction. The disassembly, transport and storage of the obelisk could result in damage; however, NPS staff would oversee the process and no adverse effects are anticipated.

Cumulative Impacts of Alternative 1

Cumulative impacts are defined as "the impact on the environment which results from the incremental impact of the action when added to other past, present, or reasonably foreseeable future actions regardless of what agency (federal or nonfederal) or person undertakes such other actions" (40 CFR 1508.7).

Although other past, present, and reasonably foreseeable future actions may affect archeological resources and cultural landscapes, the no action alternative would have no impacts on archeological resources and cultural landscapes and therefore would not contribute to the effects of other actions. Consequently, there would be no cumulative impacts to archeological resources and cultural landscapes under the no action alternative.

Cumulative Impacts of Alternative 2 – Archeological resources

Since the end of the military occupation, American Camp has been logged, burned, farmed and grazed, and past development on park lands, e.g. the construction of roads and the parking area, have all previously disturbed archeological resources, resulting in permanent adverse impacts. As described above, implementation of Alternative 2 would result in negligible adverse impacts to archeological resources. The loss of portions of two sites would not impact our understanding of ancient and recent human past as recent testing resulted in minimal findings and a recommendation that the sites are not contributing elements to the American Camp Historic District. The adverse impacts of this alternative, in combination with the adverse impacts of other past, present, and reasonably foreseeable future actions, would result in an

adverse cumulative impact. The adverse impacts of Alternative 2 would be a very small component of the adverse cumulative impact.

Cumulative Impacts of Alternative 2 – Cultural landscape

The end of the historic period revealed a landscape that was well forested adjacent to an open prairie. When the American troops arrived, the grasslands were already in a disturbed condition as a result of grazing and agricultural practices by the Hudson's Bay Company. Structurally, the historic and contemporary grassland vegetation may be quite similar (low stature with some sparse shrubbery), although the composition has changed and includes many more exotic species today. The historic forest cover was much more extensive and diverse than the extant scene. Since the end of the period of significance, American Camp has been logged, burned, farmed and grazed. The cover reduction that exists today is a result of these previous land-use practices as well as the preponderance of European rabbits and Townsend's vole. Changes in composition are partly the result of drainage patterns created during the agricultural period following military departure.

Of the original thirty-four structures, four remain today. Two (the laundress' quarters and officers' quarters) have undergone restoration. HS-10 was repatriated to American Camp in 2010. The building has been stabilized and rehabilitation of the building is proposed for 2020. The redoubt, also survives as the most intact example of pre-Civil War construction of its type in the United States. Collectively, the four structures represent the range of military construction at American Camp and contribute to the character and significance of the site. The original flag pole at the parade grounds, a small scale feature that contributed to the significance of the site, was replaced in 2011. The new flagpole is a noncontributing feature of the landscape.

As described above, implementation of Alternative 2 would result in long-term adverse impacts to the cultural landscape. The adverse impacts of this alternative, in combination with the long-term adverse impacts of other past, present, and reasonably foreseeable future actions, would result in a long-term adverse cumulative impact. The adverse impacts of Alternative 2 would be a very small component of the adverse cumulative impact.

Conclusion

Under alternative 1, there would be no new impacts to archeological resources or the cultural landscape and therefore no effects to historic properties. Under alternative 2, the outer edges of two archeological sites would be minimally disturbed, but it would not adversely affect the National Register eligibility of the sites. The cultural landscape would be impacted by the modification of the mature forest remnants around the visitor center; however, the feature would still retain the look and feel of forest and would be largely unnoticeable. The temporary relocation of the American Camp monument is not expected to affect the monument's status on the List of Classified Structures. Cumulative impacts to archeological sites and the cultural landscape would be very small and probably undetectable.

BALD EAGLES

Affected Environment

The final rule delisting the bald eagle from the Endangered Species Act was effective August 8, 2007 (USDI 2007). The bald eagle is still protected by the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act which prohibits the take, possession, sale purchase of bald eagles, including their parts, nests, or eggs without a permit. The bald eagle is also classified as sensitive by the state of Washington.

Bald eagle wintering concentrations are located at nine locations within San Juan County, including southeast San Juan Island (NPS 2012). Wintering bald eagles occur in the county from about October 31 to March 31. There are 122 nesting territories located in the county, with nesting activities occurring from about January 1 to August 15 (WFLHD and NPS, 2012).

Bald eagles typically nest in the tops of large trees near water in areas free from disturbances and often return to the same nest every year. "Bald eagles are not old-growth obligates, but need large trees capable of supporting their weight and their massive nests. They typically select the largest trees in a stand for nesting (Anthony et al. 1982)."

The nearest known bald eagle nest site is located near the visitor center. It is located approximately 165 feet west of the existing visitor center (Figure 3). A pair of breeding eagles has historically nested at the present nest which was built between December 2013 and March 2014. The eagle pair has successfully nested each year since the nest was built near the visitor center and access road, except for a failed attempt in 2017. In 2018, two eaglets hatched; however, both died after falling from the nest.

The seasonal home range that contains the foraging and nesting habitat of an eagle pair averages about 2.6 square miles in the Puget Sound region (Watson and Pierce 1998). Bald eagle suitable habitat is considered to be conifer-dominated habitat generally 80-years -old or older, or younger stands containing scattered old-growth or larger second-growth trees.

There is marginally suitable bald eagle habitat within the project area. It is possible that there is a limited number of unidentified scattered individual trees or small groups of trees within or immediately adjacent to the project area that have suitable roosting or resting structure for eagles. Therefore, dispersed eagle usage, primarily roosting, may occur throughout the project area wherever suitable habitat is present. This occasional, dispersed eagle usage would most probably occur during the late fall or winter months when over-wintering eagles are present.

Impacts of Alternative 1

There would be no new impacts to bald eagles. The eagle pair that nests near the current visitor center is accustomed to the current level of human presence and activity, which would not change under this alternative. The eagle pair initially selected the visitor center nest site despite a fair amount of human activity, and have returned annually and successfully produced young at the site. According to the National Bald Eagle Management Guidelines (USFWS 2007), "eagles are unlikely to be disturbed by routine use of roads, homes, and other facilities where such use pre-dates the eagles' successful nesting activity in a given area. Therefore, in most cases

ongoing existing uses may proceed with the same intensity with little risk of disturbing bald eagles.”

Impacts of Alternative 2

A temporary increase in human activity and noise, and permanent changes including tree removal (trees in the immediate area of the nest will not be removed), changes in the size and orientation of the visitor center, and creation of a new road, all have the potential to impact bald eagles.

Temporary, construction-related activities could impact bald eagles because of their sensitivity to human activity and noise, especially during nesting season. During the egg laying, incubation, and fledgling periods, disturbance-causing construction activities near the nest could cause eagles to inadequately construct or repair their nest, to expend energy defending the nest rather than tending to their young, or they may abandon the nest altogether. If disturbances cause prolonged absences of adults from their nests, eggs or young would be jeopardized. Additionally, if adults are startled while incubating or brooding young, they may damage eggs or injure their young as they abruptly leave the nest. Although older nestlings do not require constant attention from adults, they can still be startled by loud or intrusive human activities and prematurely jump from the nest before they are able to fly or care for themselves (USFWS 2007).

Permanent changes in habitat through vegetation removal and an expected increase in visitor use could also impact bald eagles. Although the visitor center and nearby site improvements would be primarily within the existing development footprint, the new road alignment and parking expansion would create new disturbance. Approximately 48 trees would be removed, 28 of which would be Douglas firs with an average DBH of 29 inches. Since bald eagles prefer large, mature trees (Kalasz and Buchanan 2016), the removal of large diameter Douglas fir trees contributes to a loss of a limited number of mature trees in the area, including possible alternative nest sites. However, a vegetative buffer of trees would still remain between the nest and the visitor center and the nest and the new road. Additionally, the employee parking area which is the closest development to the nest would be removed. The area being impacted is very small relative to the eagle's home range and is not expected to affect foraging opportunities or have an appreciable effect on perching sites.

Visitation and traffic at the site is not expected to substantially increase, since relatively low numbers of vehicles and people would be accommodated on site. Parking would increase from 14 to about 30 spaces. The eagle pair is accustomed to human activity and traffic and has not been averse to nesting near this activity. Therefore, a slight increase in similar uses would not likely result in disturbance.

Bald eagles exhibit relatively high year to year fidelity to nest territories and are reluctant to abandon a territory even with increased disturbance and habitat alteration. The nesting pair at the visitor center has exhibited a tolerance to the existing routine types and levels of human activities. However, even with mitigation, construction activities could exceed that level of tolerance, resulting in the possibility of nest failure or abandonment. Should nest failure or abandonment occur, it would be considered a “take” according to the U.S. Fish and Wildlife

Service. Despite the potential impacts that could occur to the eagle pair that nests near the visitor center, the project is not expected to have an appreciable effect on bald eagle population status and trends given that Washington's bald eagle population is robust and still growing.

Cumulative Impacts of Alternative 1

Although other past, present, and reasonably foreseeable future actions may affect bald eagles, the no action alternative would have no impacts on bald eagles and therefore would not contribute to the effects of other actions. Consequently, there would be no cumulative impacts to bald eagles under the no action alternative.

Cumulative Impacts of Alternative 2

Since DDT use in the U.S. was banned in 1972 and the bald eagle gained the protection of the Endangered Species Act, bald eagle numbers have rebounded. It was consequently removed from the endangered species list in 2007. However, the development of San Juan Island has resulted in bald eagle habitat fragmentation, introduction of exotic species, habitat loss, and human disturbance. Human activities such as park operations, visitor uses, and residential development in the Cattle Point peninsula continue to impact the bald eagles that use the area for nesting and foraging. However, due to NPS and DNR land management protections, many areas of environmental disruptions caused by past human activities have reverted to natural conditions and many acres of the peninsula are largely undeveloped. While there are still threats to bald eagles, current population analyses indicate that bald eagle populations will continue to grow despite those threats (Kalasz 2016). Thus these actions would largely have a long-term cumulative benefit to San Juan Island's bald eagle population. The impacts of alternative 2 would contribute a small adverse component to the overall beneficial cumulative impact.

Conclusion

Under alternative 1 there would be no change in the current level of human activities taking place near the visitor center, so there would be no new impacts to bald eagles. Under alternative 2 the potential to disturb eagles, including possible nest failure due to construction activities, is possible. Mitigation measures would be implemented to reduce the likelihood of nest failure; however, should eagles be disturbed and possible nest failure occur, this impact is not expected to effect the trends and status of the larger island bald eagle population, including the overall positive cumulative impact.

VEGETATION

Affected Environment

The most recent vascular plant inventory of the park was conducted between 2001 and 2005 (Rocheftort and Bivin 2010); this inventory supplemented previous vegetation studies (Agee 1984, 1987, Rolph and Agee 1993, Holmes 1998, Peterson 2002). As a result of the inventory, 400 species are documented within the park, 33 percent of which are exotic (i.e., non-native). Most of the exotic species were found in the prairies or in developed zones adjacent to current or historic building locations. These plants can displace native species and quickly colonize disturbed areas. Currently, the priority species for control at American Camp include Himalayan

blackberry (*Rubus armeniacus*), tansy ragwort (*Jacobaea vulgaris*), Canada thistle (*Cirsium arvense*), bull thistle (*Cirsium vulgare*), and ripgut brome (*Bromus diandrus*).

The American Camp prairie consists of non-native grass dominated prairie and riparian and mesic second-growth forests. The prairie has mesic and wet subtypes, with tall oatgrass (*Arrhenatherum elatius*) vernal grass (*Anthoxanthum odoratum*), splitawn sedge (*Carex tumulicola*), ryegrass (*Lolium perrene*) and velvetgrass (*Holcus lanatus*) dominate grasses in mesic prairies, and slough sedge (*Carex obnupta*), creeping bentgrass (*Agrostis stolonifera*), velvetgrass (*Holcus lanatus*), ryegrass (*Lolium perrene*), creeping buttercup (*Ranunculus repens*) and silver cinquefoil (*Potentilla anserine*) as the dominate grasses and forbs in wet prairies. Douglas-fir (*Pseudotsuga menziesii*) and red alder (*Alnus rubra*) dominate the canopy of the second growth riparian and mesic forests. Salmonberry (*Rubus spectabilis*), California blackberry (*Rubus ursinis*) and Nootka rose (*Rosa nutkana*) are common in the understory (Seney 2017).

Impacts of Alternative 1

No construction would occur and there would be no new impacts to vegetation.

Impacts of Alternative 2

Approximately 3 acres of forest and prairie vegetation would be removed to accommodate additional parking, a larger turning radius, and the new entrance road. The visitor center site and entrance road were sited to minimize the removal of larger trees (larger than 8 inches DBH). A total of 48 trees would be removed, of which 28 would be Douglas fir (29 in. average DBH), eight would be aspen (10 in. average DBH), eight would be hemlock (10 in. average DBH), and four would be black locust (15 in. average DBH). The additional administrative campsites and septic system would be designed to be built without removing trees; however, there potentially would be disturbance to other vegetation.

Of the estimated 48 trees that would be removed, seven are within the footprint of the new visitor center, 20 would be removed to accommodate the new entrance road, nine would be removed to accommodate additional parking and a larger turning radius, and 12 would be removed to accommodate the administrative area. When practical, the Park would make beneficial use of the logs either through incorporating into other parts of the forest for habitat purposes, or milled into lumber for use in minor construction projects (picnic tables, benches, etc.) and as replacement material to be used in repairs to historic buildings.

This level of vegetation removal would affect the abundance and distribution of individual plants and trees in a localized area, but would not change the overall size, structure, composition, or ecological processes of these plant communities. Furthermore, black locust trees are non-native, invasive species, so their proper removal would be a benefit as long as they are not allowed to re-sprout and spread. With mitigation measures in place, the introduction and spread of invasive plants would be minimized. Disturbed areas would be stabilized and revegetated with native plants.

Cumulative Impacts of Alternative 1

Although other past, present, and reasonably foreseeable future actions may affect vegetation, the no action alternative would have no impacts on vegetation and therefore would not contribute to the effects of other actions. Consequently, there would be no cumulative impacts to vegetation under the no action alternative.

Cumulative Impacts of Alternative 2

The spatial distribution of forest cover and grassland vegetation at American Camp has changed over time. The grasslands were disturbed as a result of grazing and agricultural practices by Hudson's Bay Company. Although the structure of historic and contemporary grassland vegetation is quite similar, the composition has changed and includes many more exotic species today. The historic forest cover was much more extensive than the current scene, being logged, burned, farmed, and grazed. The contribution from implementing alternative 2 would include a small incremental loss of forest and prairie communities within the project area and the American Camp unit.

Conclusion

Under alternative 1, there would be no vegetation removal, so no impacts to vegetation would occur. Under alternative 2, a total of 6 acres, including 48 mature trees, would be removed for the project. Although this vegetation loss would be permanent, none of the vegetation is considered rare, and this degree of removal would not impact ecosystem-scale vegetation processes, including the consideration of cumulative impacts. With mitigation measures in place, impacts from invasive weeds would be minimized and felled trees would be retained for beneficial use.

WETLANDS

Affected Environment

Wetlands are highly productive and biologically diverse systems that enhance water quality, control erosion, maintain stream flows, sequester carbon, and provide a home to at least one third of all threatened and endangered species in the US. The National Park Service has a "no-net-loss of wetlands" policy, which requires avoiding, minimizing, and compensating for adverse impacts on wetlands. If a proposed action will have such impacts, then compliance with these policies and procedures must be recorded in a Wetland Statement of Findings (WSOF). A WSOF for this project is located in Appendix A.

Fieldwork was conducted during July of 2017 to identify, map, and conduct functional assessments for wetlands within areas potentially impacted by the new visitor center and entry road. Wetlands were mapped based on the presence all three USACE parameters: hydric soil, wetland hydrology, and hydrophytic vegetation. Plot locations were selected based on varying plant communities as well as landscape position and slope shape. Of the 28 plots observed, 18 plots were determined to be jurisdictional wetlands based on the USACE wetland definition. There are approximately 0.97 acres of wetland within the project area, 0.52 acres of which is Palustrine Emergent Seasonally Flooded/Saturated, and 0.45 acres of which is Palustrine Forested Seasonally Flooded/Saturated wetlands. Wetland boundary locations are based on plot data and a LiDAR-derived foot elevation contour map. In addition, depth to redoximorphic

soil features and presence of wetland hydrology indicators were used to determine placement of the wetland/upland boundary.

The dominant grasses and forb species in the wet prairies include slough sedge (*Carex obnupta*), creeping bentgrass (*Agrostis stolonifera*), velvetgrass (*Holcus lanatus*), ryegrass (*Lolium perrene*), creeping buttercup (*Ranunculus repens*) and silver cinquefoil (*Potentilla anserine*). Douglas fir (*Pseudotsuga menziesii*) and red alder (*Alnus rubra*) dominate the canopy of the second growth riparian forest, with salmonberry (*Rubus spectabilis*), California blackberry (*Rubus ursinis*) and Nootka rose (*Rosa nutkana*) common in the understory. (Seney 2017)

The results of wetland function assessments suggest that all three wetlands are in poor to fair condition. The Palustrine Emergent wetlands have the lowest level of function, are highly impacted by legacy land use (grazing, agricultural use), altered drainage patterns, and the very strong presence of non-native invasive grasses. The Palustrine Forested wetland is primarily a native riparian forest plant community that displays moderate plant species richness, horizontal patchiness and vertical structure complexity.

Impacts of Alternative 1

There would be no new impacts to wetlands because there would be no change in existing conditions.

Impacts of Alternative 2

The new road alignment would bisect the Palustrine Emergent wetland and the Palustrine Forested wetland, which are adjacent to each other. Approximately 0.07 acres total, or 3,260 square feet of the wetlands would be impacted by the new road, resulting in a permanent reduction in the wetland area. Roads typically impact wetland water flow and limit infiltration beneath the road bed. In order to minimize the extent of disturbance to wetlands, measures outlined in the Mitigation section, above, would be implemented.

Construction vehicles could introduce pollutants and increase sedimentation; however mitigation measures would be employed to prevent or control spills of fuels, lubricants, or other contaminants from entering the wetland. Equipment staging and storage of materials would be located in an upland area on the eastern end of the project area away from the wetlands.

Overall impacts to wetland functions, which include improving water quality, hydrologic functions, and wildlife habitat, would be negligible. Road construction would impact a very small portion of the existing wetlands, which are in relatively fair to poor condition due to past land use. With mitigation to protect water quality and hydrology, including continued surface and groundwater connectivity between the bisected wetlands; impacts on these functions are expected to be negligible. The incremental loss of wetland habitat would have negligible effect on overall wildlife habitat. With proper mitigation measures in place, the impacts to wetlands under alternative 2 would be at a level that would not have noticeable effects on wetland values or characteristics.

Cumulative Impacts of Alternative 1

Although other past, present, and reasonably foreseeable future actions may affect wetlands, the no action alternative would have no impacts on wetlands and therefore would not contribute to the effects of other actions. Consequently, there would be no cumulative impacts to wetlands under the no action alternative.

Cumulative Impacts of Alternative 2

Major stressors to these wetlands include legacy land use, altered drainage patterns, presence of roads adjacent to two of the wetlands, and the presence of non-native invasive grasses in emergent wetlands. These actions would continue to have long-term adverse cumulative impacts to these wetlands. The adverse impacts of this alternative, in combination with the adverse impacts of other past, present, and reasonably foreseeable future actions, would result in an adverse cumulative impact. The adverse impacts of alternative 2 would be a small incremental component of the adverse cumulative impact.

Conclusion

Under alternative 1, there would be no new impacts to wetlands in the area. Under alternative 2, 0.07 acres of wetlands would be impacted by the road relocation. Impacts to the wetlands would be minimized by applying numerous mitigation measures during design and implementation, resulting in negligible effects on wetland values and characteristics. The wetlands are in poor to fair condition due to continuing cumulative impacts from legacy land use, altered drainage patterns, roads and non-native grasses. There would be an adverse cumulative impact with alternative 2 contributing a small incremental adverse component.

VISITOR USE AND EXPERIENCE

Affected Environment

Based upon available data, from 2010 to 2017, an average of 265,391 people visited the park annually, with an average of 186,400 of those people visiting American Camp annually (NPS 2018). Common activities in the park include sightseeing, walking or hiking on trails, taking photographs, and viewing wildlife. Along Cattle Point Road, motorists often stop at pullouts and pedestrians pause along the shoulder of the road to enjoy panoramic views.

The NPS provides a visitor center open a majority of the year at American Camp and interpretive opportunities including self-guided walks and hikes, as well as ranger-guided walks covering historical and natural themes. The trail system in the project area is often used for these programs.

The visitor center entrance road is situated on a curve and is adjacent to subdivision access to the nearby Eagle Cove Neighborhood. An "American Camp" sign is located just prior to the turnoff for the visitor center; however, the Eagle Cove Drive turnoff is just before the sign. Visitors see the sign and immediately see Eagle Cove Drive and often turn at this location instead of at the road to the visitor center, which is located 150 feet after the Eagle Cove Drive intersection. Both of these intersections are located on the outside of a sharp curve, resulting in poor sight distance. These issues collectively create a potentially hazardous situation.

In 2017, San Juan County and the National Park Service funded a study to assess visitor use levels and patterns at several protected areas and recreation facility locations throughout the major islands in San Juan County. The study utilized data from a variety of sources as well as collected site specific use information at attraction sites and specific park units about the visitation habits of both visitors and residents (Whittaker et al. 2018). According to this study, visitation to the San Juan Islands has increased steadily over the past 10 years (although there was little difference in visitation levels between 2016 and 2017, potentially due to disruptions to the ferry schedule or other unique factors. A survey of ferry riders suggests that nearly one quarter (approximately 23 percent) of visitors to San Juan Island, went to the American Camp visitor center or the historic buildings (Whittaker et al. 2018).

Impacts of Alternative 1

Visitation would continue to increase at projected rates. Over time, during the busy summer months, the visitor center would become crowded more often, and parking spaces would be filled to capacity more often. The visitor experience would be negatively affected by crowding and the limited space available for interpretive exhibits. Visitors would also be affected when the visitor center is not staffed and the building is closed, leaving little opportunity for them to obtain adequate orientation or in-depth interpretation of the site. Furthermore, although there is a ramp to the visitor center, the interior of the building is cramped, limiting accessibility, and the restrooms are not fully accessible; these limitations would continue under this alternative.

Problems resulting from poor placement of the American Camp entrance sign, as well as the location of the visitor center turnoff on the outside of a sharp curve, would continue to create a frustrating and potentially hazardous situation.

Impacts of Alternative 2

Upon completion of the project, visitation is expected to increase slightly more than it would under alternative 1, as more people would be attracted to a modern facility with new exhibits. Significant improvements in the new visitor center would greatly improve the visitor experience by providing an attractive building with enough space to accommodate peak visitation; modern exhibits highlighting cultural history, pre-history, and the spectacular natural setting of American Camp; space for visitor orientation; cooperating association sales; and seating for an updated audiovisual program. This project would remove all barriers to physical and programmatic accessibility by making the visitor center, parking lot, exhibits, audiovisual program, and public restrooms fully accessible, thus allowing visitors of different abilities to learn about and experience park resources. Replacement of the aging double-wide trailer with a permanent visitor center would provide a long-needed modern facility that responds to the reality of shrinking budgets and the possibility of the need for it to be unstaffed; even when closed, the visitor center would provide orientation and interpretation to visitors.

Visitor experience would be further enhanced by other site improvements, including an outdoor interpretive plaza, a gathering space, and expanded parking. Creation of the plaza and gathering space would expand interpretive opportunities for the park in general and specifically at American Camp. Relocation of the entrance road would reduce confusion with Eagle Cove Drive, as well as improve safety by moving the turnoff away from the curve in the road.

There would be short-term impacts, lasting approximately 12 months, to visitors during construction when the visitor center is closed and the parking lot would be closed to the public. However, during construction, the English Camp visitor contact station would be in service from the beginning of May through the end of September, increasing its operational period an additional two months. In addition, during the shoulder and off-seasons, emphasis would be added to visit the headquarters building in Friday Harbor. During the summer months, additional staff would be dedicated to American Camp to rove the historic grounds and trails to make personal visitor contacts, as capacity enables. Rangers would be able to update visitors on progress, aim them in the proper direction for visitor center, gift store, and passport stamp locations open at the time. Should funding allow, a "mobile visitor center" would be created in a utility trailer at South Beach. While some visitors might be disappointed about the lack of a true NPS visitor center experience during their visit (especially when the English Camp visitor center is closed), others may not notice the closed facility.

Cumulative Impacts of Alternative 1

A number of past, present, and reasonably foreseeable future actions may affect visitor use and experience, including actions that impact interpretation, recreational resources, and visitor access.

Interpretation. Current and past park activities have maintained a coherent interpretive message about the historic events on San Juan Island, including the Pig War crisis. However, old and outdated interpretive materials, as well as, small spaces for interpretation limit opportunities to obtain detailed and specific information about other park resources and their significance.

Recreational Resources. In response to the growing congestion that exists along recreation corridors during peak periods, local and county efforts are underway to improve bicycle access by establishing wider road shoulders and developing partnerships to create an island-wide trail network. Also, the park is a primary source of recreation on the island, providing public access to a variety of recreational opportunities. As private development continues, park lands become an ever more important source for recreational opportunities.

Visitor Access. In its recent parks, trails, and natural areas plan, San Juan County (2016) identified the following action as a top priority for the county: "Create and enhance non-motorized connections between existing public lands, activity centers, and other areas of interest." To that end, the Cattle Point Road trail project has continued toward its goal of establishing a trail linking Friday Harbor and American Camp.

These actions would largely have long-term cumulative benefits to visitor use and experience on the island. As described above, implementation of alternative 1 would result in long-term adverse impacts to visitor use and experience. The adverse impacts of this alternative, in combination with the predominantly beneficial impacts of other past, present, and reasonably foreseeable future actions, would result in an adverse cumulative impact. The adverse impacts of alternative 1 would be an appreciable component of the adverse cumulative impact.

Cumulative Impacts of Alternative 2

As described above, implementation of Alternative 2 would result in both short-term adverse impacts and long-term beneficial impacts to visitor use and experience. Both the adverse and beneficial impacts of this alternative, in combination with the long-term beneficial impacts of other past, present, and reasonably foreseeable future actions, would result in a long-term beneficial cumulative impact. The beneficial impacts of Alternative 2 would be an appreciable component of the beneficial cumulative impact.

Conclusion

Under alternative 1, the deficiencies that exist with the current visitor center, such as crowding, limited exhibits, poor accessibility, and the frustrating and hazardous entry from Cattle Point Road, would continue to negatively impact the visitor experience. As a result, visitors may not have the opportunity to understand the sensitivity of park resources and the complexity of the interconnections of the park's natural and cultural resources. Under alternative 2, these deficiencies would be addressed. During construction, however, the facility would be closed for a limited time, potentially causing some frustration and disappointment for some visitors during that time period; however, this may be mitigated by additional operating months at the visitor contact station at English Camp, opening the headquarters building for visitors during the shoulder and off-season, as well as providing a temporary mobile visitor contact station at South Beach. Upon completion of the project, visitor experience is expected to improve as a result of providing an attractive modern facility with new exhibits, multiple opportunities for interpretation both inside and outside of the building, and improved parking and entrance road alignment. Implementation of alternative 1 would contribute long-term adverse cumulative impacts on visitor use and experience, while alternative 2 would contribute long-term beneficial cumulative impacts.

AGENCIES AND TRIBES CONSULTED

Native Americans

On March 15, 2017, consultations were initiated by letter with the fourteen American Indian Tribes and Canadian First Nations traditionally-associated with the lands of San Juan Island National Historical Park, in accordance with 36 CFR 800.3 - Initiation of the Section 106 Process. The NPS requested assistance with the identification of any resources, practices or traditions that could be affected by construction of the proposed visitor center and its associated development and requested affirmation of the proposed area of potential effects. One tribe responded that they had no comment. Copies of the environmental assessment will be forwarded to each associated tribe for review and comment. If subsequent issues or concerns are identified, appropriate consultations would be undertaken.

On September 27, 2017 the National Park Service invited the fourteen American Indian Tribes and Canadian First Nations to participate in an exhibit design kick-off workshop in Friday Harbor, Washington on October 17 and 18, 2017 to develop interpretive content for the new visitor center. Representatives from two tribes attended the workshop.

Washington Department of Archaeology and Historic Preservation

On March 15, 2017 consultations were initiated by letter with the office of the State Historic Preservation Officer (SHPO), in accordance with 36 CFR 800.3 - Initiation of the section 106 process. The NPS requested assistance with the identification of any historic properties that could be affected by construction of the proposed visitor center and its associated development and requested affirmation of the proposed area of potential effects. By letter dated March 20, 2017 the SHPO concurred with the area of potential effects. Consultations are ongoing, with the expectation that the proposed project would result in a *no adverse effect* determination to historic properties.

United States Army Corps of Engineers

Under Section 404 of the Clean Water Act (33 USC 1344), permit approval is required for projects that may result in the discharge of dredged or fill material into waters of the U.S. The NPS will continue to work with the USACE, however it is not anticipated at this time that a Section 404 permit will be required given the amount of proposed disturbance to wetlands.

United States Fish and Wildlife Service

The Endangered Species Act of 1973, as amended (16 USC 1531 et seq.), requires all federal agencies to consult with the USFWS to ensure any action authorized, funded, or carried out by the agency does not jeopardize the continued existence of federally listed species or critical habitat. Federally listed species and a No Effect finding were discussed and confirmed with the USFWS on August 9, 2017 and May 15 and 21, 2018.

USFWS removed the bald eagle from the federal list of threatened and endangered species in 2007. Bald eagles and their nests are still protected by the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act. USFWS was consulted concerning potential impacts and mitigation for the bald eagle nest site near the visitor center. The NPS will implement measures to minimize impacts, however, because of the proximity of the nest site to the visitor center the possibility of disturbance to the breeding pair would still exist. The Bald and Golden Eagle Protection Act prohibits anyone, without a permit issued by the Secretary of the Interior, from "taking" bald eagles, including their parts, nests, or eggs. Therefore the NPS will apply for a non-purposeful take permit from the USFWS to ensure appropriate compliance has been completed should take occur.

On April 12, 2018 the USFWS proposed to list the island marble butterfly (*Euchloe ausonides insulanus*) as an endangered species and designate critical habitat under the Endangered Species Act of 1973. The project area is located within and adjacent to the proposed critical habitat for the island marble butterfly. On May 15, 2018 and May 21, 2018, the NPS consulted with USFWS in regards to the island marble butterfly and the proposed critical habitat designation that includes the areas within the proposed visitor center construction. USFWS concurred with the assessment that there will be no foreseeable impacts on the island marble butterfly population within the current project area as there have been no island marble butterfly detections or host plants identified.

PUBLIC INVOLVEMENT

Public involvement was initiated on two separate occasions through meetings and NPS presence at the local county fair. First, the park superintendent hosted two informal public meetings at the current visitor center location on June 27 and 28, 2017. Five people attended the meetings, where project maps and drawings were displayed and the superintendent was available to describe proposed work and answer questions. Second, park staff, including the superintendent, hosted a booth focused on disseminating information and collecting feedback on the proposed project at the San Juan County Fair in 2017 and 2018. There was overall support for the project, but there were concerns over impacts to wetlands and bald eagles.

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APPENDIX A DRAFT WETLANDS STATEMENT OF FINDINGS

DRAFT STATEMENT OF FINDINGS FOR
EXECUTIVE ORDER 11990 (PROTECTION OF WETLANDS)

Replace American Camp Visitor Center

San Juan Island National Historical Park
San Juan County, Washington

Recommended:

Superintendent, San Juan Island
National Historical Park

Date

*Certification of
Technical Adequacy
And Servicewide Consistency:*

Chief, Water Resources Division

Date

Approved:

Regional Director,
Pacific West Region

Date

INTRODUCTION

Executive Order (EO) 11990: *Protection of Wetlands*, issued 24 May 1977, directs all federal agencies to avoid to the maximum extent possible the long- and short-term adverse impacts associated with the occupancy, destruction or modification of wetlands and to avoid direct or indirect support of new construction in wetlands wherever there is a practicable alternative. In the absence of such alternatives, parks must modify actions to preserve and enhance wetland values and minimize degradation.

To comply with EO 11990 within the context of the agency's mission, the National Park Service (NPS) has developed a set of policies and procedures found in *Director's Order (DO)#77-1: Wetland Protection* (NPS 2002) and *Procedural Manual (PM) #77-1: Wetland Protection* (NPS 2016). These policies and procedures emphasize: 1) avoiding adverse wetland impacts to the extent practicable; 2) minimizing impacts to wetlands that cannot be avoided; and 3) providing direct compensation for any unavoidable wetland impacts by restoring degraded wetlands. If a preferred alternative would have adverse impacts on wetlands, a Statement of Findings (SOF) must be prepared that documents the above steps and presents the rationale for choosing an alternative that would have adverse impacts on wetlands.

PROPOSED ACTION

The NPS proposes to replace the 40 year-old visitor center at American Camp in the same location with visitor information and orientation facility designed with an exterior plaza, gathering and demonstration space and picnic areas. Other project components include expanded parking, replacement of the septic system, additional administrative campsites for park volunteers and seasonal staff, expansion of the maintenance storage area, and relocation of the visitor center entrance road (Figure 1).

Only relocation of the visitor center entrance road would potentially impact wetlands (Figure 2). The existing entrance road intersection with Cattle Point Road is located on the outside of a sharp curve, resulting in poor sight distance. This location poses a traffic safety hazard for vehicles entering and exiting the site. This location on the curve and adjacency to the Eagle Cove Drive intersection often results in visitor confusion as to where to turn into the site and visitors mistakenly turn onto Eagle Cove Drive which is the access road for an adjacent subdivision. The entrance road also takes visitor traffic immediately past the administrative campsites and maintenance area. The entrance road would be relocated to improve safety and the visitor entrance arrival experience by realigning the Cattle Point Road / entrance road intersection and entrance road alignment to the north. A segment of the existing entrance road would be retained as a separate access to the housing and maintenance area and the existing entrance road intersection would be removed and the area rehabilitated to match the adjacent topography.



Figure 1: Preferred Alternative Site Plan

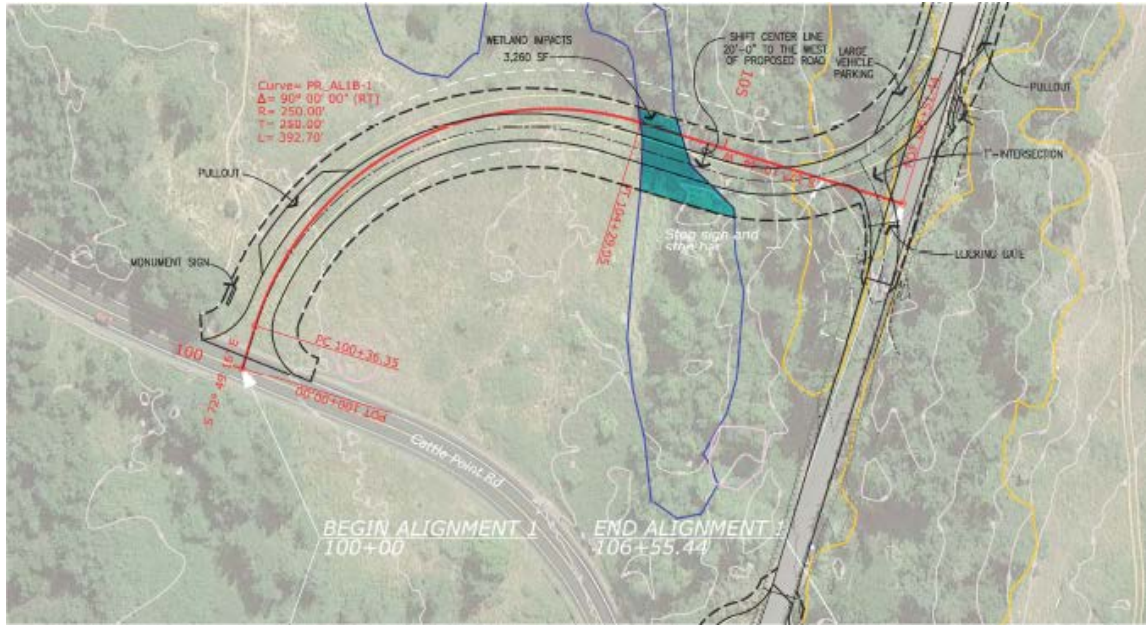


Figure 2: Preferred Entrance Road Alignment

PROJECT AREA

American Camp is located on the southeast peninsula of San Juan Island approximately 5.8 miles south (15 minute drive) of the town of Friday Harbor, Washington. The American Camp unit is composed of 1,223 acres that cover a broad ridge overlooking Griffin Bay to the north and Haro Strait and the Strait of Juan de Fuca to the south, and includes an expanse of rare coastal prairie, coniferous forest, and marine shoreline.

The American Camp visitor center site is located near the western boundary of American Camp on the north slope of the ridge (at an elevation of approximately 200 feet). The project area encompasses an area surrounding the visitor center and access road.

The project area consists of non-native grass dominated prairie and riparian and mesic second-growth forests. The prairie has mesic and wet subtypes, with tall oatgrass (*Arrhenatherum elatius*) vernal grass (*Anthoxanthum odoratum*), splitawn sedge (*Carex tumulicola*), ryegrass (*Lolium perrene*) and velvetgrass (*Holcus lanatus*) dominate grasses in mesic prairies. Slough sedge (*Carex obnupta*), creeping bentgrass (*Agrostis stolonifera*), velvetgrass (*Holcus lanatus*), ryegrass (*Lolium perrene*), creeping buttercup (*Ranunculus repens*) and silver cinquefoil (*Potentilla anserina*) as the dominate grasses and forbs in wet prairies. Douglas-fir (*Pseudotsuga menziesii*) and red alder (*Alnus rubra*) dominate the canopy of the second growth riparian and mesic forests. Salmonberry (*Rubus spectabilis*), California blackberry (*Rubus ursinis*) and Nootka rose (*Rosa nutkana*) are common in the understory.

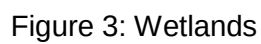
WETLANDS AND FUNCTIONS

Joe Seney, Soil Scientist, Redwood National and State Parks conducted fieldwork within the project area July 24 -27, 2017. The delineation procedure was pursuant to the U.S. Army Corps of Engineers Wetlands Delineation Manual and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys, and Coast Region (Version 2.0) (USACE 1987, USACE 2010). Wetlands within the project area were mapped based on the presence all three USACE parameters, hydric soil, wetland hydrology and hydrophytic vegetation for determining wetlands (Figure 3). There are approximately 0.97 acres of wetland within the project area. There are 0.52 acres of Palustrine Emergent Seasonally Flooded/Saturated (wetlands, #1001 and #1002) and 0.45 acres of Palustrine Forested Seasonally Flooded/Saturated wetlands (wetland #2001). These wetlands appear in digressional landscape features and there are no surface hydrology features (e.g., channels) or observable ordinary high water lines. They are groundwater driven with some ponding during wetter months.

Wetland condition assessments were completed using the Wetland Rating System for Western Washington (Hruby, 2014). This rating system uses Categories I through IV and was designed to differentiate between wetlands based on their sensitivity to disturbance, their significance, their rarity, our ability to replace them, and their habitat functions, hydrologic functions (flood storage and reducing erosion), and the functions that improve water quality (sediment retention, nutrient removal, and removal of toxic compounds).

Both palustrine emergent wetlands, #1001 and #1002 scored out as Category IV wetlands. These wetlands have the lowest levels of function and are highly impacted by legacy land use, altered drainage patterns, and the very strong presence of non-native invasive grasses. The Palustrine Forested wetland (#2001) scored out as a Category III wetland with a moderate level of functions. Major stressors are legacy land use, altered drainage patterns, and runoff from nearby roads, although there is primarily a native riparian forest plant community that displays moderate plant species richness, horizontal

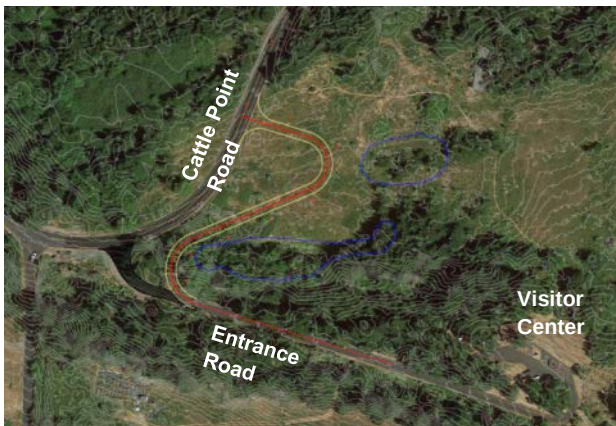
Page 40



INVESTIGATION OF ALTERNATIVES

Construction of the new visitor center and associated site improvements, additional administrative camp sites and the expansion of the maintenance storage area would avoid wetlands. Only relocation of the visitor center entrance road would potentially impact wetlands. The preferred entrance road alignment (Figure 1), no action and four additional entrance road alignments (alignments 2, 3, 4 and 5) were considered. All the realignment options include the relocation of the Cattle Point Road / entrance road intersection to the north to a safer and less confusing location.

Table 1 shows the total impact for each alignment alternative. Although the preferred entrance road alignment impacts 0.07 acre of wetland, this preferred alignment provides a safer and less complicated driving experience than most of the alternative alignments. The alignment was designed to bisect the existing wetland at its narrowest location. The preferred entrance road alignment would tie seamlessly back into the existing entrance road with no stop conditions for the visitor traffic flow. Alignments 3, 4, and 5 would be similar but include a T intersection which presents unnecessary options and stop-and-go decisions. Alignment 2 would follow a longer more circuitous route that would not provide a separate visitor entrance road that would avoid passing through the park operations area. It would limit the number of administrative camping sites that could be provided. Alignments 4 and 5 are the longest routes. They would relocate the road the furthest east and closest to (within about 80 feet of) an existing bald eagle nest in the forest west of the visitor center. They would also require the greatest tree removal.



Alignment 2



Alignment 3



Alignment 4



Alignment 5

IMPACTS TO WETLANDS IN THE PROJECT AREA

The only project component that would adversely affect wetlands is the relocation of the entrance road. Table 1 shows the wetland area impacted for the preferred alignment and the four other entrance road alignments that were evaluated and dismissed. The wetlands that would be affected are currently highly impacted from past and present landscape alterations and are of low to moderate functional quality. In order to minimize wetland impacts as much as practicable, road alignment 1 was routed to cross the wetlands at the narrowest point. In order to maintain shallow ground and surface water connections between the bisected wetland areas, the road prism will be engineered with highly permeable fill material.

Table 1: Wetland Impacts by Alternative

Alternative	Realignment Length (Ft.)	Wetland Impacts (Sq. Ft. / Acres)
Alignment 1(Preferred Alignment)	652	3,260 / 0.07
Alignment 2	757	0
Alignment 3	681	2,158 / 0.05
Alignment 4	846	0
Alignment 5	994	0

MITIGATION MEASURES

- The road would cross the wetlands at their narrowest point.
- Construction within the wetland would be limited to the smallest area necessary and the construction limits clearly demarcated.
- Measures would be employed to prevent or control spills of fuels, lubricants, or other contaminants from entering the wetland.
- Erosion and sedimentation control measures would be placed prior to construction activities and maintained during construction.
- Fill materials with high permeability would be used where the road crosses the wetland area to maintain any surface or groundwater connectivity between the bisected wetland areas.
- Hydric soil material will be stored and reused at the site to the greatest extent practicable. All disturbed soil and fill slopes will be stabilized and revegetated with native vegetation.
- Equipment staging and storage of materials would be located in an upland area on the eastern end of the project area away from the wetlands. No equipment will drive through the wetlands beyond the foot print of construction during construction activities.

CONCLUSIONS

Alignment 1 was identified as the preferred entrance road alignment and was included in the environmental assessment preferred site plan alternative. The NPS considered the nature and extent of the impacts to park resources, costs, and the degree to which the alternatives achieved the purpose and need for the entrance road which is to improve the safety and the visitor entrance experience. Alignment 1 provides the shortest direct entrance alignment, avoids stop-and-go intersections, and effectively separates access to the NPS operational functions (administrative camping and maintenance area) from the visitor access route. It also allows greater options for configuring the expanded camping and maintenance areas. Although this alignment would impact wetlands, the impact would be limited (0.07 acres) to wetlands with low functional value, and this alignment would result in the least amount of overall impacts to soils, mature trees and forest and would allow for the greatest separation of the road from an existing bald eagle nest. According to guidance in the NPS Procedural Manual #77-1: Wetland Protection, no compensatory mitigation is required for the loss of this wetland area.

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