

U.S. DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE, NORTHEAST REGION

FINDING OF NO SIGNIFICANT IMPACT

Flexible Design Strategies for Relocating Oceanside Campground

**Assateague Island National Seashore
Berlin, Maryland**

INTRODUCTION

The National Park Service (NPS) has prepared this Finding of No Significant Impact (FONSI) for the Assateague Island National Seashore (seashore) *Flexible Design Strategy for Relocating Oceanside Campground Environmental Assessment, 2018* (EA). The campsites at Oceanside Campground are extremely vulnerable to natural coastal processes including the action of tides, wind, waves, currents, and sea level rise that continually influence and shape the island. Many campsites at Oceanside Campground are not sustainable in the face of the natural westward movement of Assateague Island and the observed more intense, more frequent, and more damaging coastal storms of the past few decades. In recent years, moving sand has overtaken campsites on the eastern edge of the secondary dune, burying several of the campsite asphalt pads, making them unusable. Recurring maintenance as a result of the sand movement has become a burden for NPS staff and increased the costs of seashore operations.

Recognizing the vulnerability of the Oceanside Campground infrastructure and the high value that seashore visitors place on the seashore's beach camping experience, the NPS developed a flexible design strategy for gradually relocating Oceanside campsites as they are damaged or lost to moving sand.

The flexible design strategy will not reduce the number of campsites available at the seashore; rather, the strategy will guide seashore managers in deciding how damaged campground facilities will be repaired, shifted to more sustainable designs and/or be relocated to more stable locations, while at the same time seeking to retain the current number of campsites in proximity to the ocean for as long as conditions allow.

The NPS prepared an environmental assessment (EA) that evaluated two alternatives: a no action alternative and the proposed action/preferred alternative. The EA analyzed the potential impacts that the alternatives would have on the natural, cultural, and human environment. The EA was prepared in accordance with the National Environmental Policy Act of 1969 (42 USC 4321 *et seq.*) and its implementing regulations (40 Code of Federal Regulations [CFR] 1500-1508.9); and with NPS Director's Order 12: *Conservation Planning, Environmental Impact Analysis, and Decision-making* (2011) and its accompanying handbook (2015).

During preparation of the EA, the NPS consulted with federal and state agencies, tribes, interested and affected parties and the general public. The EA was made available for a 30-day review period, during which one public meeting was held. Eight comments on the EA were received. Commenters provided suggestions for the design and implementation of the project that the NPS will consider during the implementation phase. One commenter requested that the NPS provide the criteria that will be used to determine when a campsite has been damaged to the point where it must be removed and replaced. This information has been added to the description of the selected action below. No other changes were made as a result of public or agency comments on the EA.

SELECTED ACTION

The NPS selected action for implementation is the proposed action and preferred alternative described and analyzed in the EA. The selected action was described on pages 11-13 of the EA. The full description is provided below. Information on how the NPS will make decisions about individual campsites has been added to the selected action as noted above.

Under the selected action, seashore managers will seek to retain the current number of campsites in proximity to the ocean for as long as conditions allow. Over time, as the natural westward movement of the island continues, the NPS will gradually relocate Oceanside Campground infrastructure—including roads, parking areas, comfort stations, and campsites—west of the projected 2040 secondary dune (see Figure 1.2 attached). As facilities are damaged or lost to storms and/or natural coastal processes, Oceanside Campground drive-in campsites will be gradually relocated to the Bayside Campground (see Figure 2.2 attached). Over time, the Oceanside Campground will be converted to walk-in campsites (exclusive of the two host campsites).

In making decisions about converting or relocating an individual campsite, the NPS will use a decision-making framework that considers a number of contributing factors such as:

- the depth of sand cover to be cleared requiring significant excavation;
- degree of storm damage to infrastructure and cost of repair/replacement;
- likelihood that deep sand cover would reoccur frequently making the location increasing unsustainable for a paved drive-in site but possibly suitable for a walk-in site;
- avoiding and minimizing impacts to natural and cultural resources; for example, maintaining setbacks from wetlands and minimizing disturbance to vegetation and migrating dune systems;
- quality of the visitor camping experience by retaining vs relocating or converting a campsite;
- compliance with current NPS guidance for accessibility;
- availability of funds.

Overall, the total number of campsites at the seashore will stay the same, but the ratio of drive-in campsites to walk-in campsites will decrease from 59 percent to 49 percent. Attachment A provides prototypes for drive-in campsites, accessible drive-in campsites and walk-in campsites, comfort stations (toilets and cold-water showers), and the group campsite parking area.

Oceanside Individual Drive-in Campsites

Oceanside Loops 1 and 2 are almost entirely within the projected 2040 secondary dune, where storm damage and dune migration will continue to occur. Under the selected action, as conditions change, NPS will gradually remove the existing 41 drive-in campsites and related campground infrastructure. Two drive-in campsites will be relocated along the eastern edge of Oceanside Drive to serve as the Oceanside Campground host campsites. Twenty-four drive-in campsites will be relocated to the Bayside Peninsula, of which five will be constructed to be accessible.

Oceanside Individual Walk-in Campsites

Fifteen Oceanside drive-in campsites will be replaced with walk-in campsites, increasing the number of walk-in campsites at Oceanside from 63 to 78. Over time, walk-in campsites will be relocated, as needed, so that all will be west of the projected 2040 foredune. Initially, the easternmost walk-in campsites that

are now in the existing foredune will likely be relocated to the area previously occupied by the Oceanside Loop 1 and Loop 2 drive-in campsites.

Four relocated walk-in campsites will be constructed to be accessible campsites.

Two relocated parking areas (with 18 and 21 spaces) will serve the relocated walk-in campsites. The southernmost existing walk-in campsite parking area (F) with 19 parking spaces will be removed, as the sites that it now serves will be relocated to the north. Boardwalk L will be removed, and boardwalks G and H will be relocated.

Of the six existing mobile comfort stations (each including two toilets, two cold-water showers, and a dumpster), four will be relocated to the edge of the walk-in campsite parking areas, one will remain where it is, and one will be relocated to Bayside. Potable water service will be extended to the relocated comfort stations; water lines serving existing sites will be abandoned in place.

Group Campsites

The seashore's five group campsites will be relocated from the existing foredune to the projected 2040 secondary dune. The existing vault toilets and cold-water showers, access road, and parking area will be relocated west of the projected 2040 secondary dune. The relocated parking area will have the same footprint and capacity as the existing group parking area, which is adequate to meet demand when all five group campsites are occupied. Traffic will enter from and exit to Oceanside Drive.

Equestrian Campsites

The seashore's two equestrian campsites will be relocated from their existing location near parking area E to sites west of the projected 2040 secondary dune, adjacent to the relocated group campsites. The two campsites will be located next to one another, just west of the relocated group campsite parking area. The campsites will be accessed through the group campsite parking area. Each campsite will have a stabilized area for parking and turning around a horse trailer. Campers using the equestrian campsites will use the relocated comfort station at the group campsite. Potable water will be extended to each campsite.

Accessibility

New campground facilities will comply with U.S. Access Board standards for outdoor developed areas (U.S. Access Board 2013). The flexible design strategy calls for eight accessible campsites, as required for a campground that includes from 151 to 200 campsites (the total number of campsites at the seashore in the proposed action is 153).

There will be a mix of drive-in campsites and walk-in campsites, with the numbers of each reflective of the ratio of drive-ins to walk-ins in the total campground program for each alternative. Boardwalks will connect accessible parking areas to accessible campsites and accessible campsites to accessible restrooms. Accessible beach access via boardwalks and/or mobility mats will be provided from accessible walk-in campsites.

Reuse and Removal of Campground Facilities

Existing campground facilities such picnic tables, fire rings, and mobile comfort stations and showers will be reused at relocated campsites. Asphalt paving and campsite pads will be removed and transported from the island to a local asphalt company for recycling.

MITIGATION MEASURES

NPS will implement mitigation measures to avoid, prevent, or minimize adverse impacts during implementation of the flexible design strategy components. Attachment B lists the mitigation measures incorporated in the proposed action. The exact measures to be implemented will depend upon the final design of approved plans by relevant agencies.

FINDING OF NO SIGNIFICANT IMPACT

As described in the EA, the selected action will have a primarily beneficial impact on floodplains and both adverse and beneficial impacts to the visitor experience. No potential for significant adverse impacts was identified.

The study area is entirely within the 100-year floodplain. In the near term, there will be no change in existing conditions with regard to the relatively faster conveyance of stormwater and sheetflow into surrounding areas that occurs during precipitation events. Over time, the incremental relocation of hardened infrastructure will result in a small degree of improvement in floodplain functions due to the gradual reduction of impervious surface and sites are left to revegetate naturally. Relocated infrastructure such as parking areas and drive-in camping pads may be constructed with either asphalt or an aggregate material. The use of aggregate conveys sheetflow into the surrounding areas but at a much slower rate than asphalt; thus, the mixed use of asphalt and aggregate for relocated infrastructure is expected to reduce the overall impacts on floodplain functions over time.

Under the selected action, NPS will continue to offer a camping experience in proximity to the beach at the Oceanside Campground at individual campsites, group campsites, and equestrian campsites. The selected action will retain the total number of campsites available at the seashore; however, as the natural westward movement of the island continues, the gradual relocation of drive-in campsites at Oceanside Campground will eventually result in fewer individual campsites available at the Oceanside Campground. It is impossible to predict how many campsites may need to be relocated or converted in any given year; however, it is expected to be a gradual process occurring over many years. The existing campsites at Oceanside Campground will be retained as long as possible. Overall, it is expected that 77 percent of visitors who today use the individual campsites at the Oceanside Campground will continue to be able to do so for the next 10 to 30 years. In the long term, it is likely that drive-in camping will no longer be possible at Oceanside Campground. The character of the experience at individual campsites will also change from a mix of drive-in camping and walk-in camping to all walk-in camping. This will eliminate a decades-long traditional experience for many seashore visitors. Conversely, visitors who seek a more primitive camping experience, will benefit from an increased number of walk-in campsites and more dispersed campsites with less crowding. In addition, there will be more opportunities for accessible camping, as the accessible campsites under the selected action will accommodate up to 24 visitors with disabilities per night, four times what is accommodated today.

In summary, the selected action will not have a significant effect on the human environment. There are no significant impacts on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the *National Register of Historic Places*, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant

cumulative effects, or elements of precedence were identified. Implementation of the selected action will not violate any federal, state, or local environmental protection law.

Based on the foregoing, it has been determined that an environmental impact statement is not required for this action and thus will not be prepared.

DECISION REACHED AND RATIONALE

The NPS has selected the proposed action and preferred alternative described and analyzed in the EA for implementation, as described in this Finding of No Significant Impact, because it effectively addresses the stated purpose and need for taking action.

Seashore managers need a flexible design strategy so that they know how to respond when storms damage the Oceanside Campground campsites and campground infrastructure. Following a damaging storm, managers must make quick and frequently difficult decisions about how to repair, replace or relocate campground facilities. Many factors influence these decisions such as preservation of the seashore's natural and cultural resources, public desires and expectations regarding camping at the seashore, competing demands for limited resources, priorities for using available funds and staff, and differing local and nationwide interests and views of what is most important at the seashore.

The flexible design strategy provides a decision-making framework that enables seashore managers to minimize or avoid the damaging effects of natural coastal processes by evolving visitor use infrastructure to more sustainable designs and shifting them to new, more stable locations. Further, it achieves the goal of maintaining the total number of campsites within the Maryland Developed Area (defined in the seashore's GMP) as there are today, adjusting the location and mix of campsite types (drive-in and walk-in), as needed, by relocating campsites to more sustainable locations and/or converting drive-in campsites to walk-in campsites. The strategy will allow for anticipated dune migration westward through 2040 and will enhance dune stabilization while maintaining a safe and enjoyable camping experience for visitors and protecting infrastructure and facilities. It will also comply with U.S. Access Board standards for outdoor developed areas.

For these reasons and in consideration of the likely environmental impacts described in the EA and this Finding of No Significant Impact, I have decided to select the proposed action/preferred alternative for implementation.

DEBORAH DARDEN Digitally signed by DEBORAH DARDEN
Date: 2019.01.31 10:17:46 -05'00'

Recommended: _____

Deborah A. Darden, Superintendent
Assateague Island National Seashore

Date

Approved: _____


Gay Vietzke, Regional Director
Northeast Region, National Park Service

Feb 25, 2019
Date

Figure 1.2	2040 Projected Beach and Dunes
Figure 2.2	Selected Action (Alternative 3 Proposed Action/Preferred Alternative)
Attachment A	Campground Facilities Prototypes
Attachment B	Mitigation Measures and Permits and Approvals Needed
Attachment C	Agency and Tribal Coordination
Attachment D	Non-Impairment Determination

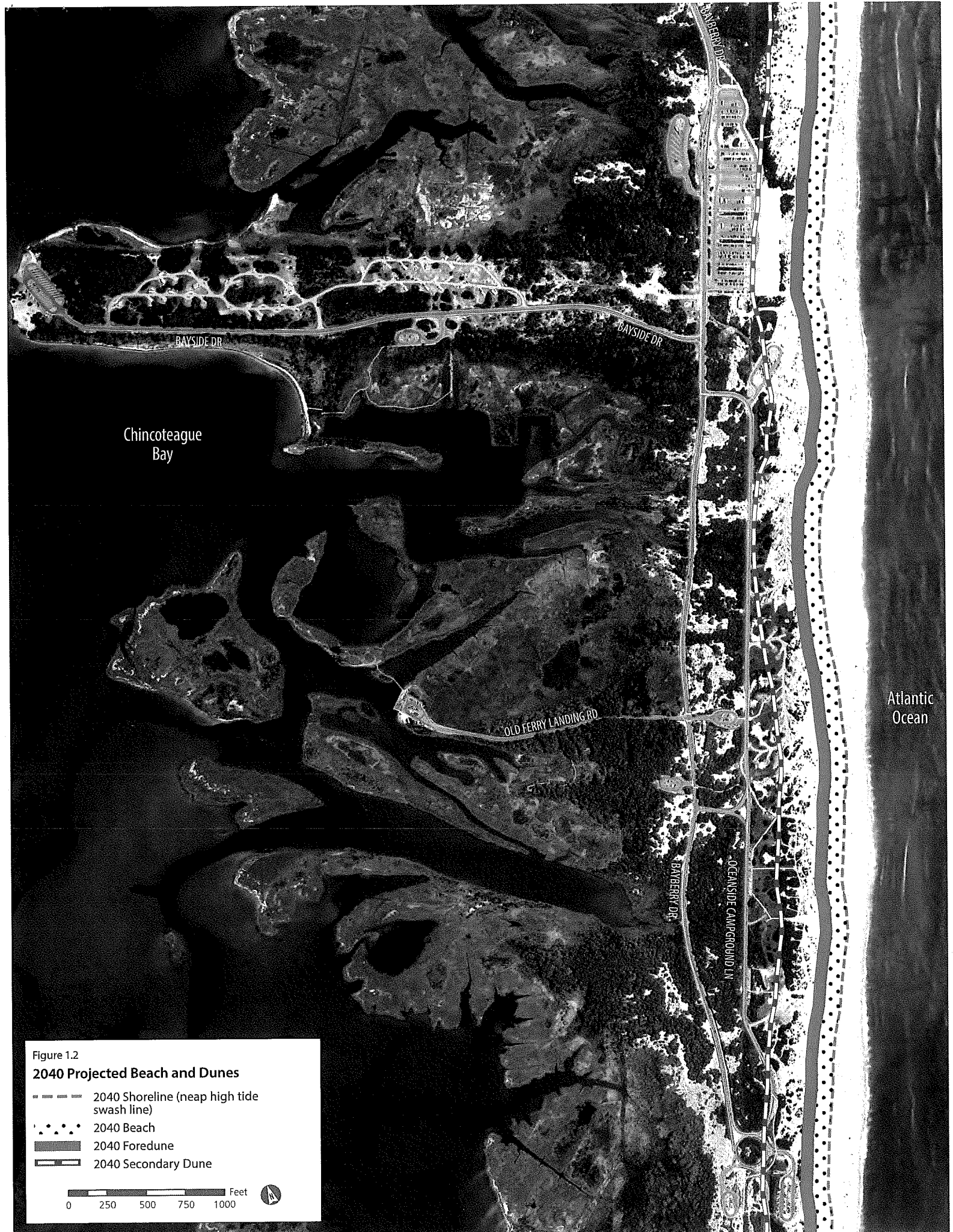
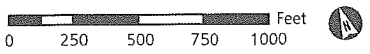


Figure 1.2
2040 Projected Beach and Dunes

- 2040 Shoreline (neap high tide swash line)
- ... 2040 Beach
- 2040 Foredune
- == 2040 Secondary Dune



ALTERNATIVE 3 - OCEANSIDE (PREFERRED)

Legend:

- 41 WALK-IN CAMPSITES (existing)
- 33 WALK-IN CAMPSITES (15 converted from drive-in to walk-in plus 18 relocated)
- Ⓐ 4 ACCESSIBLE WALK-IN CAMPSITES (relocated)
- Ⓜ 2 DRIVE-IN HOST CAMPSITES (relocated)
- Ⓒ 5 GROUP CAMPSITES (relocated)
- EQ 2 EQUESTRIAN CAMPSITES (relocated)
- 7 MOBILE COMFORT STATIONS WITH COLD SHOWERS (1 existing, 6 relocated)

Map Labels:

- 2040 PROJECTED SHORELINE
- 2040 PROJECTED BEACH (WESTERN LIMIT)
- 2040 PROJECTED FOREDUNE (WESTERN LIMIT)
- 2040 PROJECTED SECONDARY DUNE (WESTERN LIMIT)
- ACCOMMODATION ZONE BOUNDARY
- RELOCATED PEDESTRIAN CROSSING
- EXISTING WELL
- MAINTENANCE FACILITY (1 ACRE) (RELOCATED)
- EXISTING WELL
- EXISTING BIKE PATH
- RELOCATED BOARDWALK
- RELOCATED BOARDWALK G
- RELOCATED PARKING
- 18 SPACES
- 21 SPACES
- 10 SPACES
- 19 SPACES
- 20 SPACES
- OCEANSIDE DRIVE
- BAYBERRY DRIVE
- BAYSIDE LANDING RD
- BAYSIDE LANDING ROAD MAINTAINED AS CLOSED TO THROUGH TRAFFIC
- CROSSROAD MAINTAINED AS OPEN TO THROUGH TRAFFIC
- EXISTING PARKING
- EXISTING PARKING TO BE REMOVED
- EXISTING DUMP STATION TO BE REMOVED
- EXISTING BOARDWALK TO BE REMOVED
- ZONE VE
- ZONE X
- ZONE AE

Scale: 0' 150' 300' 600'

Legend

Floodplains

- Floodplain Limits

Wetlands

- Atlantic Coastal Bays Critical Area (100' from tidal wetlands)
- Non-Tidal Wetlands
- 25' Buffer (from non-tidal wetlands)

Island Landscape

- Beach
- Dune
- Maritime Forest and Shrub
- Salt Marsh

Map Labels:

- EXISTING BIKE PATH
- EXISTING COMFORT STATION
- RELOCATED MOBILE COMFORT STATION
- EXISTING COMFORT STATION
- 32
- 20
- 14
- 7
- BAYSIDE DRIVE
- PROPOSED ADMINISTRATIVE ROAD FOR KAYAK CONCESSION ACCESS (NOT PART OF THIS PROJECT)
- RELOCATED PEDESTRIAN CROSSING
- BAYSIDE DRIVE RELOCATION (APPROXIMATELY 850 LF)
- EXISTING WELL
- MAINTENANCE FACILITY (1 ACRE) (RELOCATED)
- RELOCATED DUMP STATION
- 0' 150' 300' 600'

Alternative 3 - Bayside (Preferred)

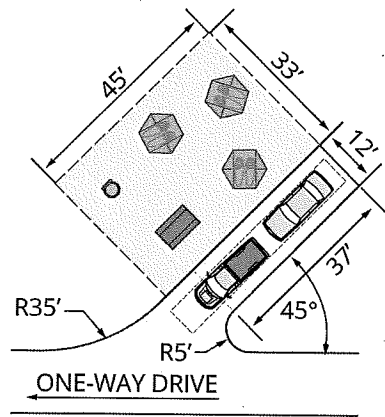
- 8 DRIVE-IN CAMPSITES (existing)
- 61 DRIVE-IN CAMPSITES (including 2 host sites) (relocated)
- 4 ACCESSIBLE DRIVE-IN CAMPSITES (relocated)
- 2 COMFORT STATIONS WITH COLD SHOWERS (existing)
- 2 MOBILE COMFORT STATIONS WITH COLD SHOWERS (relocated)
- 1 DUMP STATION (two tanks) (relocated)
- 1 MAINTENANCE FACILITY (relocated)

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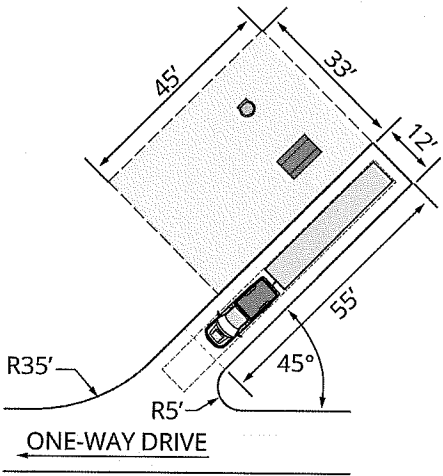
ATTACHMENT A
CAMPGROUND FACILITIES PROTOTYPES

Assateague Campground Redesign
STANDARD DRIVE-IN CAMPSITE PROTOTYPES

BACK-IN TO RIGHT

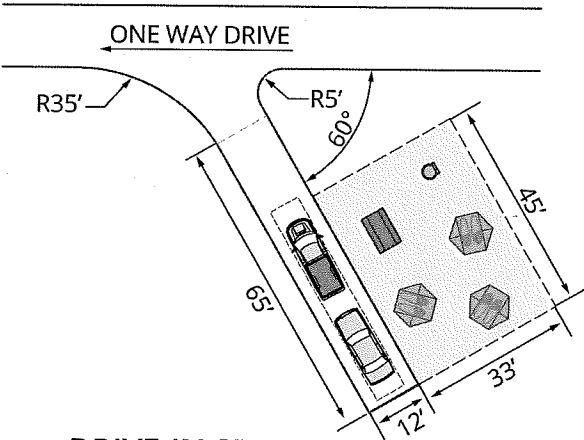


DRIVE-IN CAMPSITE
45' MAX VEHICLE LENGTH
(1485 SF + 714 SF DRIVEWAY)

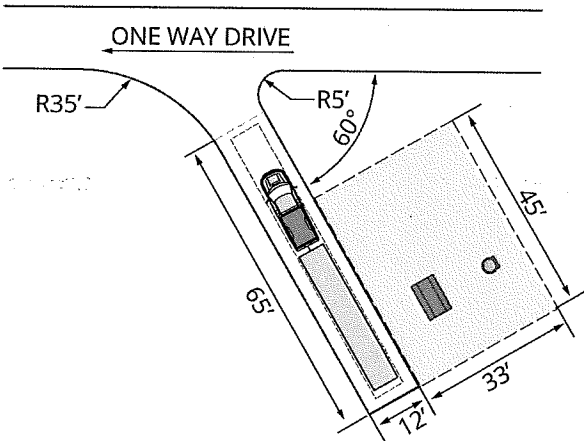


DRIVE-IN CAMPSITE
62' MAX VEHICLE LENGTH
(1485 SF + 927 SF DRIVEWAY)

BACK-IN TO LEFT



DRIVE-IN SITE
45' MAX VEHICLE
(1485 SF + 1030 SF DRIVEWAY)

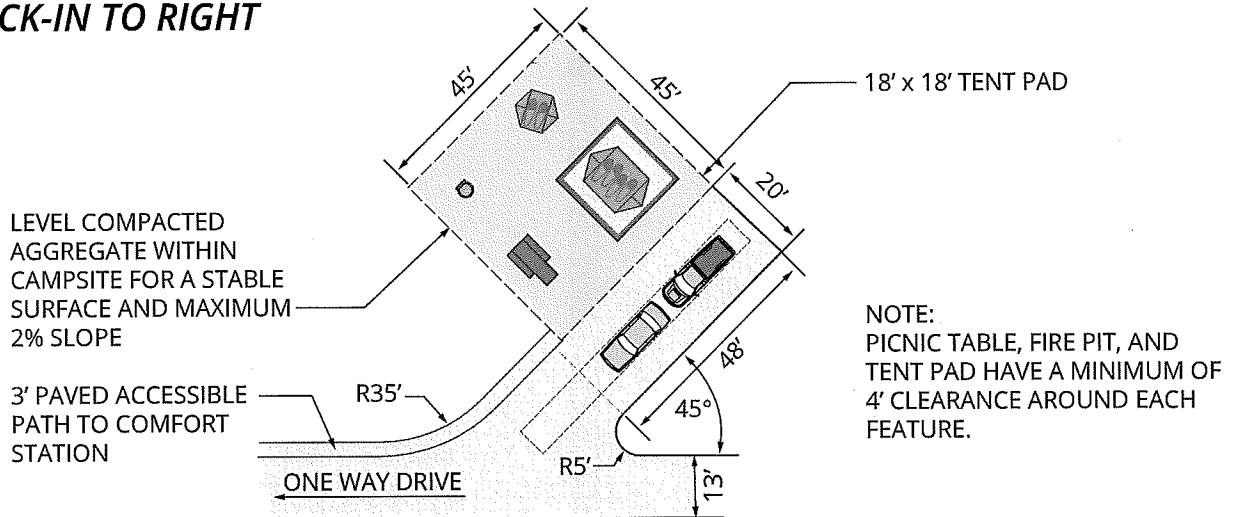


DRIVE-IN SITE
62' MAX VEHICLE
(1485 SF + 1030 SF DRIVEWAY)

Assateague Campground Redesign

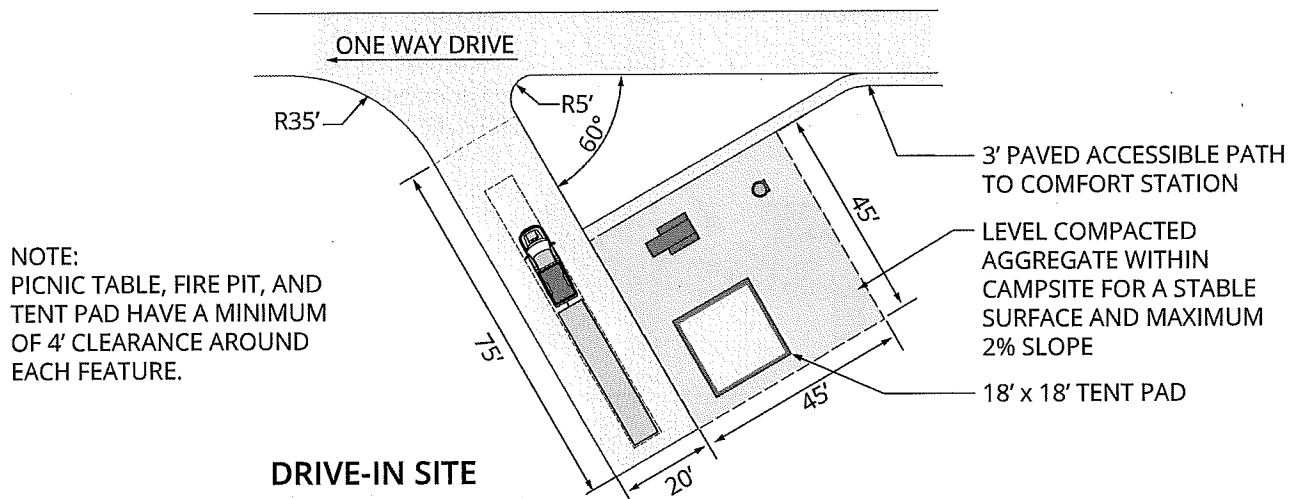
ACCESSIBLE DRIVE-IN CAMPSITE PROTOTYPES

BACK-IN TO RIGHT



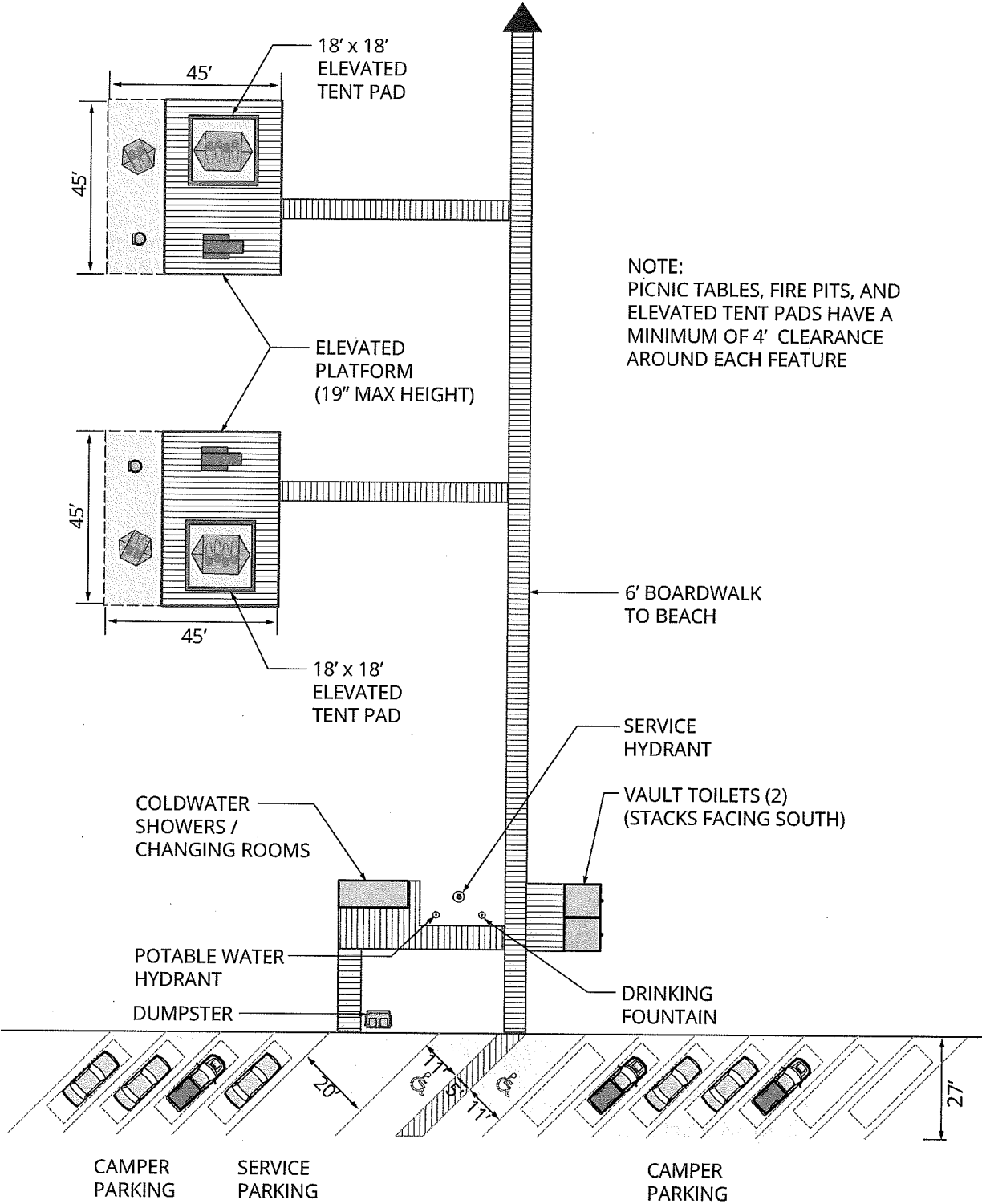
DRIVE-IN SITE
62' MAX VEHICLE
 (2025 SF + 1895 SF DRIVEWAY)

BACK-IN TO LEFT



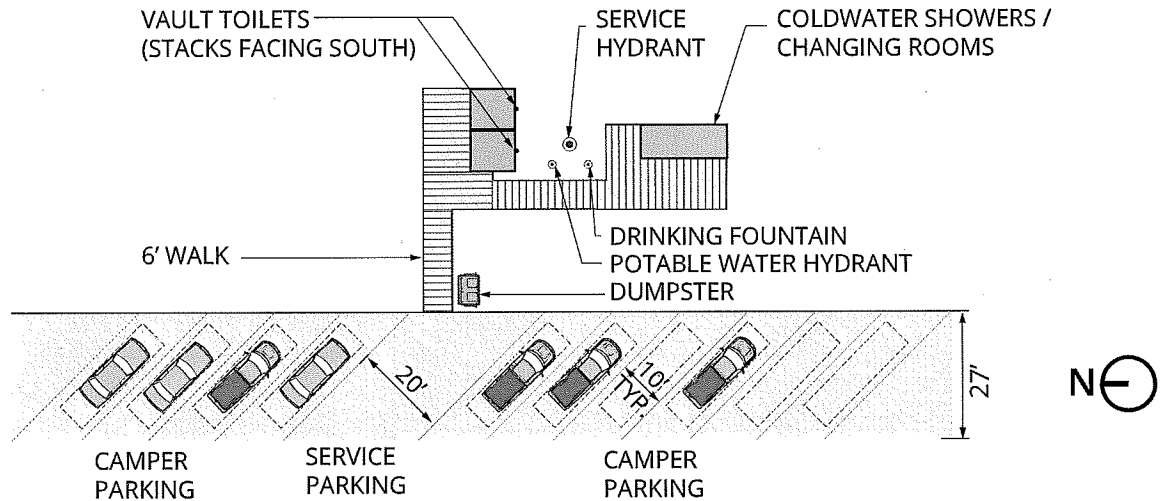
DRIVE-IN SITE
62' MAX VEHICLE
 (2025 SF + 1905 SF DRIVEWAY)

Assateague Campground Redesign
ACCESSIBLE WALK-IN CAMPSITE PROTOTYPE

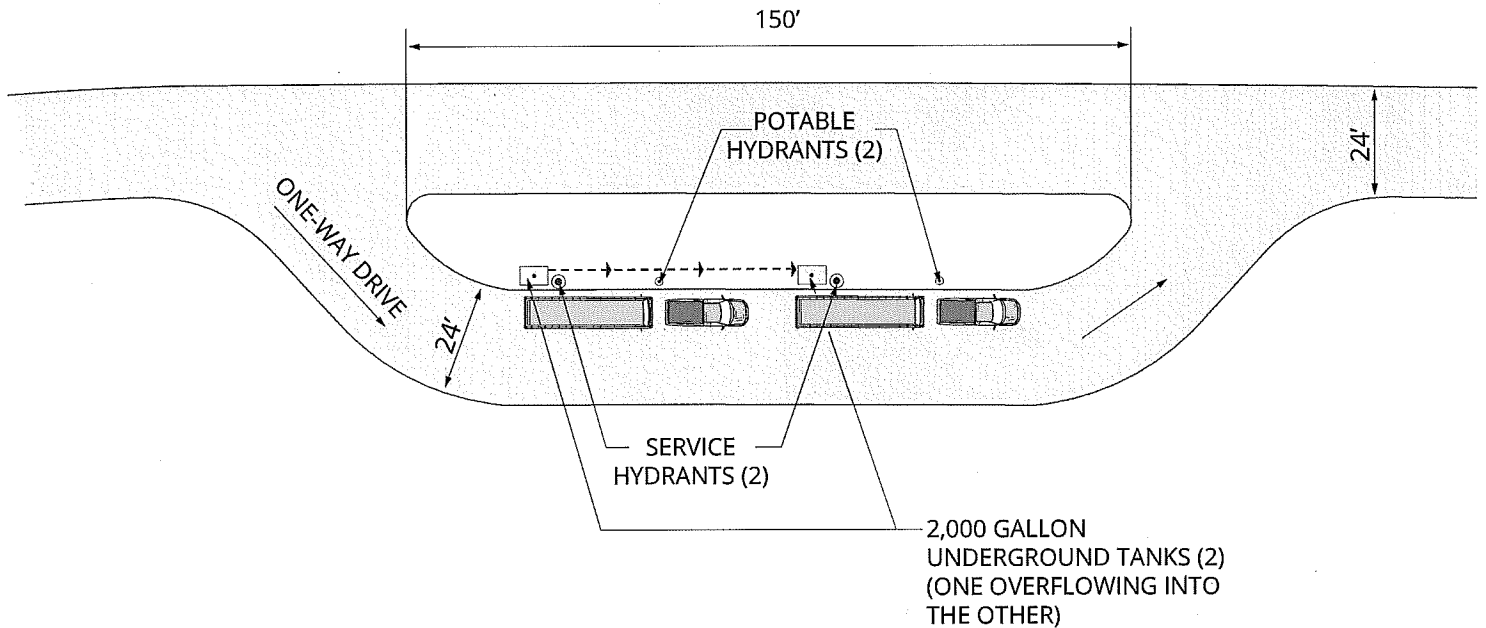


Assateague Campground Redesign

MOBILE COMFORT STATION

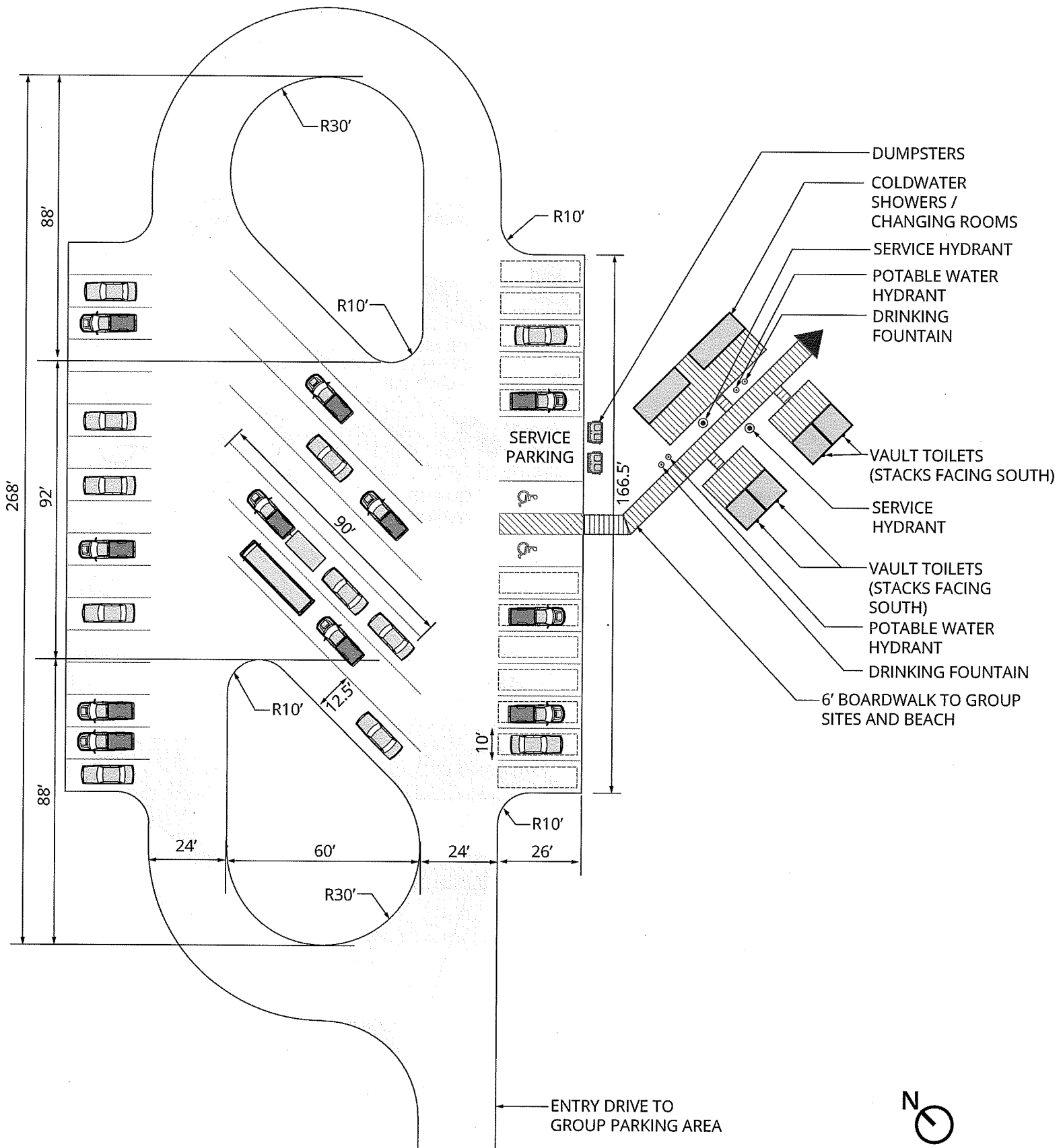


DUMP STATION



Assateague Campground Redesign

GROUP PARKING PROTOTYPE



ATTACHMENT B

MITIGATION MEASURES

MITIGATION MEASURES

To avoid and minimize potential adverse impacts associated with the selected action, best management practices and mitigation measures will be implemented during the design, construction and post-construction phases of the project. This list provides a framework for mitigation measures that will be included in the contractor's plans and specifications; however, the National Park Service (NPS) can modify the best management practices and mitigation measures as a result of permit or design requirements.

Any contractor retained for any phase of the action will abide by the conditions and procedures identified in this Finding of No Significant Impact and any required permits. The following is a list of typical mitigation measures that could be applied:

- Develop and enforce a traffic and pedestrian control plan for use during construction that will minimize disruption to visitors and park operations and that will ensure safety of the public, park employees, and contractors.
- Share information with the public regarding the flexible design strategy and its effects on park access, parking, and circulation, including but not limited to distribution/posting of information at entrance stations, on the park's website and social media, in parking areas, at trailheads, at other visitor sites, and through press releases.
- Clearly state mitigation measures in construction specifications, including but not limited to the following:
 - Coordinate with park staff to minimize disruption of normal park activities.
 - Inform construction workers and supervisors about the special sensitivity of park values, regulations, and appropriate housekeeping measures to be used.
 - Limit parking of construction and construction worker vehicles to designated staging areas or existing roads and parking lots.
 - Define construction zones that limit the area of activity to the minimum required for construction and to protect wetlands. When establishing the limits of construction zones, retain undisturbed buffers adjoining wetlands of 25' from tidal wetlands and 100' feet from non-tidal wetlands. Identify the perimeter of all construction zones using construction tape, temporary fencing, or other material prior to construction.
 - During construction, protect areas of mature forest and shrub/scrub vegetation that are to be retained on site.
 - Implement stormwater management and water quality protection measures, as appropriate, in advance of construction of new campground facilities, such as infiltration trenches around new parking areas.

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- Use soil erosion best management practices such as sediment traps, erosion check screen filters, and hydro mulch to prevent entry of sediment into waterways.
- Develop and implement an NPS approved dust control plan prior to construction.
- Backfill excavated areas with appropriate native material and contour them so that, after settling, they blend with the surrounding terrain. Ensure that any recycled concrete or road base used for backfill is free of waste metal products, debris, toxic material, or other deleterious substances and that it meets gradation and aggregate test requirements.
- Ensure that construction equipment uses the best available technology for sound dampening muffler and exhaust systems.
- Develop and implement a plan that prevents excessive idling of all vehicles used in construction.
- Require good housekeeping practices such as placing debris in refuse containers daily, emptying containers regularly, and prohibiting the burning or burying of refuse in the park.
- Comply with federal and state regulations for storage, handling, and disposal of hazardous material and waste. If hazardous materials are used on site, make provisions for storage, containment, and disposal.
- Minimize onsite fueling and maintenance.
- Inspect equipment for leaks of oil, fuels, or hydraulic fluids before and during use to prevent soil and water contamination.
- Require provisions for the containment of spills and the removal and safe disposal of contaminated materials, including soil.
- Take care to avoid any rutting caused by vehicles or equipment.

ATTACHMENT C
AGENCY AND TRIBAL CONSULTATION AND CORRESPONDENCE

SECTION 7 OF THE ENDANGERED SPECIES ACT

In a letter sent in February 27, 2017, the NPS initiated informal consultation with the U.S. Fish and Wildlife Service regarding the presence of federally listed threatened or endangered species in the vicinity of the national seashore. Based on information received from the U.S. Fish and Wildlife Service, a review of the U.S. Fish and Wildlife Service Information, Planning and Conservation website, information gathered during scoping, and a review of park records and field surveys, NPS has determined that no federally listed or proposed species or critical habitat under the jurisdiction of the USFWS occur in the area that will be affected by the selected action. No further coordination with the USFWS is required.

SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT

At the onset of this environmental assessment process, in accordance with section 800.3(c) of the Advisory Council on Historic Preservation's regulations (36 CFR 800), the park sent a letter on February 27, 2017 to consult with the Maryland State Historic Preservation Officer to initiate section 106 consultation. Efforts to identify cultural resources in the study area included a site files search at the Maryland Historical Trust, archival research, literature review, and a Phase I archeological survey conducted in the spring of 2017. Investigations considered the same general area as those areas being considered in this environmental assessment. Findings were summarized in *Phase IA Assessment of Archaeological Potential in Advance of the Proposed Relocation of the Oceanside Campgrounds at Assateague Island National Seashore*. Several archeological resource areas were documented within the project study area. Alternative strategies developed and analyzed in the EA avoided affecting the identified resource areas. The NPS determined that implementation of the proposed action will have no effect on historic properties. In a letter dated August 17, 2018, the State Historic Preservation Office concurred that no historic properties will be affected by the selected action.

COASTAL ZONE MANAGEMENT ACT CONSISTENCY DETERMINATION

The NPS has completed federal Coastal Zone Management Consistency Review and consultation, pursuant to the Coastal Zone Management Act, as amended, with the Maryland Department of Natural Resources. Based on the information, data, and analysis presented in the determination, the NPS finds the selected action consistent to the maximum extent practicable with the enforceable policies of the Maryland Coastal Zone Management Program.

TRIBAL COORDINATION

The NPS initiated tribal consultation on February 27, 2017 by sending letters to the Delaware Nation and the Delaware Tribe of Indians. The tribes were also sent notification of the release of the EA for public review in July 2018. No responses were received.

ATTACHMENT D
NON-IMPAIRMENT DETERMINATION

By enacting the National Park Service (NPS) Organic Act of 1916 (Organic Act), Congress directed the US Department of Interior and NPS to manage units "to conserve the scenery and the natural and historic objects and wildlife therein and to provide for the enjoyment of the same in such a manner and by such a means as will leave them unimpaired for the enjoyment of future generations" (54 United States Code [USC] § 100101). Congress reiterated this mandate in the Redwood National Park Expansion Act of 1978 by stating that NPS must conduct its actions in a manner that will ensure no "derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress" (54 USC 100101).

NPS *Management Policies 2006*, section 1.4.4, explains the prohibition on impairment of park resources and values.

While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them.

NPS has discretion to allow impacts on park resources and values when necessary and appropriate to fulfill the purposes of a park (NPS *Management Policies 2006*, section 1.4.3). However, NPS cannot allow an adverse impact that would constitute impairment of the affected resources and values (section 1.4.3). An action constitutes an impairment when its impacts "harm the integrity of Park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values" (section 1.4.5). To determine impairment, NPS must evaluate "the particular resources and values that would be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts" (section 1.4.5).

This determination on impairment has been prepared for the selected action described in this Finding of No Significant Impact. An impairment determination is made for the floodplains resource topic. An impairment determination is not made for visitor use and experience because impairment findings relate back to park resources and values, and these impact areas are not generally considered to be park resources or values according to the Organic Act. Therefore, visitor use and experience cannot be impaired in the same way that an action can impair park resources and values.

Floodplains

The selected action will not result in impairment to floodplains within the park. While the project area is entirely within the 100-year floodplain, the impact to floodplains associated with the selected action will be slight and beneficial. There will be a 1.38-acre net reduction in impervious cover at the Oceanside

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Campground that will generally enhance floodplain functions and protect floodplain values within the project area.

Conclusion

In the professional judgement of the NPS decision-maker, the adverse impacts that may result from implementing the selected action will not rise to levels that will constitute impairment. This determination is based on consideration of the park's purpose and significance, a thorough analysis of the environmental impacts described in the EA, relevant scientific studies, the comments provided by the public and others, and the professional judgment of the decision maker, as guided by the direction of the NPS Management Policies 2006 (NPS 2006).

