

# **Prisoners Harbor Campground Public Review and Comment Summary February 25th, 2022**

## **A. PUBLIC REVIEW BACKGROUND**

[National Park Service \(NPS\) DO-12 NEPA Handbook](#) guidance for Categorical Exclusions suggests seeking public comment in situations where there is a high degree of public interest or uncertainty regarding potential effects of a proposed action. The NPS solicited public feedback on two occasions during the planning process.

From May 20, 2020, through July 12, 2020, the National Park Service (NPS) invited the public to provide input on preliminary designs for the development of a new campground (“the plan”) at Prisoners Harbor on Santa Cruz Island at Channel Islands National Park (“the park”). The public was invited to submit feedback by mail, email, or on the project website. A total of 10 correspondences were received in this first round of civic engagement. Of those correspondences, all were submitted by California residents.

From May 26, 2021, through June 25, 2021, the National Park Service (NPS) invited the public to provide input on the updated Santa Cruz Island Prisoners Harbor Proposed Campground plan. The updated plan addressed concerns from the previous round of civic engagement and included the following modifications: addition of an accessible campsite and an accessible restroom, requiring campers to camp on tent pads, and conducting a visitor use and resource condition monitoring plan to inform adaptive campground management of public uses. The public was invited to submit feedback by mail, email, or on the project website at <https://parkplanning.nps.gov/prisonersharborcampground>. A total of 43 correspondences were received in the second round of civic engagement. Of those correspondences, the majority were submitted by California residents, except for two correspondences submitted by residents of North Carolina and New Mexico. In addition, among those correspondences, were comments submitted by individuals who identified themselves as official representatives from the following agencies or organizations: National Parks Conservation Association; The Nature Conservancy; and Bike Works of Lompoc.

This report provides a summary of public comments from the second round of civic engagement and NPS responses grouped into the following themes: campground design; campground location; natural resources; cultural resources; staffing; safety; trespass; water; interpretive programming; and environmental compliance.

## **B. PUBLIC REVIEW PROCESS**

The National Park Service reviewed and analyzed comments for substantive content and has summarized and responded to comments organized by themed categories in section C below. As defined in the NPS DO-12 NEPA Handbook, “Substantive comments are those that:

- question, with reasonable basis, the accuracy of the information in the NEPA document;
- question, with reasonable basis, the adequacy of the environmental analysis;
- present reasonable alternatives other than those presented in the NEPA document; or
- cause changes or revisions in the proposal..

In other words, substantive comments raise, debate, or question a point of fact or analysis. Comments that merely support or oppose a proposal or that merely agree or disagree with NPS policy are not considered substantive.”

Many commenters expressed gratitude for the following elements of this plan: improving access to the area, increasing camping opportunities on the island, improvements from the previous design, including tent pads to protect vegetation, balancing preservation with education and visitor stewardship, placing the campground on previously disturbed area, including an accessible site and restroom, placing picnic area near trees for shade and wind protection, and improving opportunities for kayakers, hikers, and backpackers.

Multiple commenters expressed a preference for this area to remain natural instead of being developed into a campground, out of concern that a new campground would result in an increase of waste, unlawful activities, and a reduction of the quality of the natural and cultural resources. Some commenters also expressed concern that increased visitor use to this area may result in trespassing on land owned by The Nature Conservancy (TNC) bordering the proposed campground.

In general, a commenter’s personal opinion on a subject is not considered a substantive comment. Where appropriate, the impact analysis was revised for corrections and clarifications from substantive comments.

## **C. PUBLIC COMMENT SUMMARY AND RESPONSE TO COMMENTS BY TOPIC THEME**

The summarized concerns and responses below respond to the substantive comments received during the public review and comment period. The final project description, including compliance documents and mitigations, is available at <https://parkplanning.nps.gov/prisonersharborcampground>

### **Theme 1: Campground Design**

Some commenters suggested increasing the size of tent pads and increasing the number of campground sites (up to 10 or 12 total sites). Some commenters suggested adding trails through the campsite and installing larger warning signs around hazards throughout the campground. One commenter suggested moving the accessible campsite to an area less exposed, farther from the center of restroom traffic. Some commenters expressed a desire for materials to derive from sustainable sources including recycled materials and providing an opportunity for visitors to recycle goods to discourage waste.

#### **NPS Response:**

As stated in the park’s General Management Plan (GMP), the campground would have a capacity of 24 people. The proposed number of sites align with the overall capacity of the proposed facility. As noted in figure 15, a small trail system within the campground has been proposed. Sites have been designed to be 8 feet by 20 feet to minimize ground disturbance while still allowing room for picnic tables, food storage boxes and tents. While the initial design scoping did not identify any hazards near the proposed campground, if any hazards are identified during surveying, appropriate warning signs would be installed to protect the safety of visitors and park staff. The accessible site is proposed to be 16 feet by 24 feet allowing for increased spacing of improvements. Due to the size of the accessible site and the topography of the terrain, locating the site adjacent to the road was the only feasible option.

As with other campgrounds in the park, the proposed campground at Prisoners Harbor will require visitors to pack out everything that was packed in. This includes garbage as well as recyclables.

## **Theme 2: Campground Location**

One commenter expressed concerns about the location of the campground as not being consistent with the General Management Plan. Some commenters suggested installing mooring buoys at Prisoners Harbor.

### **NPS Response:**

The park's General Management Plan and Record of Decision calls for the development of a small, 24-person, primitive campground near Prisoners Harbor on Santa Cruz Island, to enhance camping opportunities and accommodate visitors wanting to stay overnight and explore this portion of the island. Site specific compliance was deferred until implementation, providing the park with the opportunity to evaluate and select the best location within the area while being consistent with the intent of the GMP. The park evaluated four different locations for the campground. The park identified the selected location as preferred. This location has been previously disturbed. This location has a lower potential for erosion. This location is not visible from the ocean. This location keeps structures consolidated in a developed area. This location is accessible to visitors with mobility issues and would provide some privacy to visitors utilizing the campground.

When creating the General Management Plan, the park planning team considered providing buoys, but decided not to propose these devices be provided. As explained in the General Management Plan, the park is not aware of unacceptable impacts occurring to marine resources, such as eel grass due to anchoring by private boaters but agrees additional study of this possible impact is warranted. There are also unanswered questions regarding who would install and maintain the mooring buoys, possible liability issues, setting a user capacity, and the impact on the viewshed if many boats were to use the buoys. The National Park Service has indicated in the final plan that it would work with the sanctuary, the National Marine Fisheries Service, and the state, all of whom share jurisdiction over these waters, to evaluate the impact of anchoring by private boaters and determine if environmentally sensitive mooring devices should be employed in the park.

## **Theme 3: Natural Resources**

Many commenters expressed support for the protection of native plants, rare plants, federally protected plants, wetlands, and wildlife including island foxes. Some commenters want to ensure that this plan discourages social trailing and continues coordination with state agencies, such as the California Coastal Commission. Some commenters expressed concern that increased visitor traffic to the proposed campground may result in an increase of non-native species in this area via invasive plants traveling on visitors' boots to campsites.

### **NPS Response:**

The park agrees that protecting resources is of critical importance. The planning process has been extensive. The location, not just of the campground itself, but also including improvements within the campground incorporated feedback from botanists, wildlife biologists, hydrologists, arborists, and wildland fire managers. Educational signage and fencing would limit off trail travel and a monitoring plan will identify further steps to implement, such as increased outreach/education, staffing, restoration, or other measures, if necessary, to address impacts. The park does and will continue to coordinate with the California Coastal Commission to ensure that all park activities are conducted in a manner consistent to the maximum extent practicable with California's Coastal Management Program. The California Coastal Commission has concurred with the park's Negative Determination for the 2015 General Management Plan which called for increased opportunities for public access in the park, including the development of campsites. Further, the California Coastal Commission has agreed with the park's subsequent determination that the

proposed action would not adversely affect coastal resources. The park maintains a robust biosecurity program, which includes an Integrated Pest Management (IPM) coordinator/specialist. The potential for the introduction of non-native species would be reduced with continued implementation of biosecurity measures, including visitor education efforts, and providing visitors with brushes and boot scrapers to rid their boots and clothing of nonnative plant seeds before they set foot on the islands. Regular monitoring of the area for non-native species would allow for rapid response to address newly introduced threats. Resource stewardship has been prominent at each step in the planning process of this proposed campground.

#### **Theme 4: Cultural Resources**

Multiple commenters expressed support for the protection of archaeological sites, cultural landscapes, and other culturally sensitive areas, and using physical barriers such as fences. One commenter expressed concern regarding access for tribal members who are not directly connected to these islands.

##### **NPS Response:**

The park is committed to the protection of culturally sensitive areas and access for all peoples, including indigenous peoples not specifically connected to these lands. The cultural landscape at Prisoners Harbor can be experienced and appreciated from many locations that can be accessed by park visitors. The planning process has been extensive. Archeological surveys have been performed. The park has consulted with tribal partners as well as the State Historic Preservation Office. The NPS made two site visits with tribal representatives. The park has conducted outreach to the local tribal communities to invite review and comment. The proposed campground has been designed to avoid adverse effects to the important historic and cultural features and overall setting. The design includes area fencing and other features to protect sensitive cultural resources. The proposal has been reviewed by qualified NPS professionals at the park and the Pacific West Region, the State Historic Preservation Office, and consulting tribal partners under Section 106 of the National Historic Preservation Act and has been confirmed to have No Adverse Effect to cultural resources.

#### **Theme 5: Staffing**

Multiple commenters expressed a desire for more information about how the campground would be staffed and whether staff would live on site. Multiple commenters expressed that appropriate staffing is integral to enforce the law, maintain facilities, provide visitor protection and interpretive services, protect resources, and respond to emergencies (such as heat illness, drowning, injury, alcohol poisoning, and uncontained fires). Some commenters suggest housing staff at Del Norte Cabin and some commenters suggest providing a campground host to support campground operations. Some commenters would like the campground to include regulations around age restrictions, allowable flotation devices, and the use of pets, drones, fire, and bikes.

##### **NPS Response:**

Currently the park does not have plans for regular overnight staffing in proximity to the proposed campground. This approach is consistent with other remote campgrounds. The park may provide intermittent staffing coverage from Del Norte. Camping in remote locations requires visitors to prepare and plan for their adventure. The park helps to educate visitors through the park website, the reservation website, and with orientations upon arrival. A sign will be installed at the campground that will outline specific regulations. A visitor use and resource condition monitoring plan will inform adaptive campground management.

#### **Theme 6: Safety**

One commenter expressed concern about crossing the Canada del Puerto stream when traveling to and from the boat landing. One commenter expressed concern that in the event of a wildfire, the fire might trap visitors in the canyon and block the evacuation routes from Rancho Del Norte, the US Navy

site, and the Central Valley facilities (which house TNC and University of California Santa Barbara Field Station personnel and associated groups).

**NPS Response:**

Park staff works closely with the concession operator regarding weather conditions. During periods of heavy rain and hazardous flooding, ferry operations typically don't operate. However, to further increase margins of safety, signs warning of potential of hazardous moving water during periods of heavy rain would be installed. Park Staff, concession operators, and park partners would continue to communicate and coordinate closely, particularly during hazardous weather events. This includes items such as, changes in sea state, wind conditions, or road status, as well as emergency closures and hazardous conditions. During orientations, visitors are briefed on any known forecasted hazardous weather and the associated potential risks. In addition, signs that alert people to the risk of flooding during extremely heavy rainstorms would be added at either end of Canada del Puerto.

While there may be some increased risk of fire with increased overnight visitation there is not a history of wildfire caused by campers within Channel Islands NP. The lighting or maintaining of fires, including campfires, is prohibited. Only enclosed gas stoves are allowed. Campsite improvements such as picnic tables, food storage boxes and decomposed granite surfaces are designed to minimize fire risk. Fuels reductions actions in the immediate vicinity of sites will also reduce fire risk. Smoking is prohibited except on the beach near Prisoners Harbor. Further, there are numerous national, state, and local agreements regarding wildfire management that support wildlife planning and response.

**Theme 7: Trespass**

Multiple commenters, including The Nature Conservancy (TNC), expressed concern that visitors would trespass onto TNC's property.

**NPS Response:**

Each visitor to the island receives an orientation upon arrival to the islands. Camping and other regulations, such as trespass onto private property, are included in visitor orientation. The plan includes engineering improvements, such as signage and fencing along the property line. These education and engineering solutions will help to minimize inadvertent trespass incidents. Title 36 of the Code of Federal Regulations allows for the NPS to enter into agreements with landowners for purposes such as this. The agreement between TNC and Channel Islands NP specifically identifies trespassing. Coordination on this mutual concern is long-standing and will continue to occur.

**Theme 8: Water**

Multiple commenters expressed a desire for potable water available at the campground to support opportunities for campers of all abilities and for campers on multi-day trips.

**NPS Response:**

Water is extremely limited throughout the Channel Islands. Although the preferred alternative in the General Management Plan stated that potable water may be provided at some popular destinations on Santa Cruz Island, this would only occur if it proves feasible. The park does not have a well near this location and as a result, it is not currently feasible for park staff to provide, treat and test potable water at this proposed campground. As with campgrounds on Anacapa Island, Santa Barbara Island, San Miguel Island and at the Del Norte Campground on Santa Cruz Island, visitors will be responsible for bringing their own water.

### **Theme 9: Interpretive Programming**

Multiple commenters would like the campground to include educational materials regarding natural and cultural resources of the island including the Chumash story and native plants, presented via printed or digital materials, with opportunities to engage with park staff or a campground host to learn more.

#### **NPS Response:**

Visitor appreciation of park resources is currently enhanced through nonpersonal interpretive services including wayside exhibits, the park websites, webcams, publications, the NPS mobile application and other educational media. Specifically, there are 4 waysides exhibits at Prisoners Harbor, a printed interpretive guide (including trail guide), and over 25 sites within the app that provide detailed photos and information on the resources and regulations in the Prisoners Harbor area. An additional sign will be installed at the campground that will outline specific regulations with regards to the campground and respecting private property rights of The Nature Conservancy. While the park does not have plans for regular staffing at this location, periodically, NPS representatives are available to provide in-person learning opportunities.

### **Theme 10: Environmental Compliance: NEPA, other Policies, Regulations, & Laws**

One commenter expressed concern that selected categorical exclusion was inappropriately applied and that extraordinary circumstances related to the risks of wildfire prevent the use of the categorical exclusion pathway under the National Environmental Policy Act (NEPA).

#### **NPS Response:**

The NPS uses three pathways, or levels of analysis and documentation, to comply with NEPA. The Categorical Exclusion pathway is appropriate for actions that have been found to have no potential for individual or cumulative significant environmental impacts under ordinary circumstances, and for which a Categorical Exclusion has been defined. This project involves the construction or installation of minor structures including picnic tables, tent pads, wildlife-proof food storage boxes and a restroom in an area with a history of over 100 years of disturbance. The proposed action and associated impacts are consistent with NPS NEPA Categorical Exclusion “C.18 - Construction of minor structures, including small, improved parking lots, in previously disturbed or developed areas” (NPS NEPA Handbook section 3.3).

As described in Theme 6: Safety, while there may be some increased risk of fire with increased overnight visitation there is not a history of wildfire caused by campers within Channel Islands NP. The lighting or maintaining of fires, including campfires, is prohibited. Only enclosed gas stoves are allowed. Campsite improvements such as picnic tables, food storage boxes and decomposed granite surfaces are designed to minimize fire risk. Fuels reductions actions in the immediate vicinity of sites will also reduce fire risk. Smoking is prohibited except on the beach near Prisoners Harbor. Further, there are numerous national, state, and local agreements regarding wildfire management that support wildlife planning and response.