

Scoping Document

*Prepared in compliance with the National Environmental Policy Act of 1969, with
40 CFR Parts 1500-1508, and with 23 CFR 771*

CATTLE POINT ROAD EIS

San Juan County, Washington State

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and

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Acronyms

AASHTO	American Association of State Highway and Transportation Officials
ADT	Average Daily Traffic
CFR	Code of Federal Regulations
DEIS	Draft Environmental Impact Statement
DNR	Washington State Department of Natural Resources
EIS	Environmental Impact Statement
FHWA	Federal Highway Administration
HDR	HDR Engineering, Inc.
MPH	Miles per Hour
NEPA	National Environmental Policy Act
NOI	Notice of Intent
NPS	National Park Service
NRCA	Natural Resource Conservation Area
Park	San Juan Island National Historical Park
VPD	Vehicles per Day
WFLHD	Western Federal Lands Highway Division

Executive Summary

The purpose of this report is to document the methods used and results of the Cattle Point Road Environmental Impact Statement (EIS) scoping process, which is being undertaken in accordance with Part 1501.7 Scoping of the Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (NEPA) (40 CFR Parts 1500-1508) and with 23 CFR 771.111 Early Coordination, Public Involvement, and Project Development. The aim of the scoping process is to define the range of actions, alternatives, and issues to be considered in the environmental impact statement for this project.

A scoping effort for this project was originally initiated by San Juan County Public Works and San Juan Island National Historical Park. A scoping document was published by HDR Engineering Inc. in February 2002. However, Congress earmarked Public Lands Highway Discretionary (PLHD) program funds for the project to begin the NEPA process. This change in funding has initiated a change in the lead agencies and it has been determined that a review and revision of the determinations made during the scoping process undertaken in 2002 is warranted.

The Western Federal Lands Highway Division (WFLHD) of the Federal Highway Administration (FHWA) and the National Park Service (NPS) are the co-lead agencies for this project. San Juan County (County) and the Washington State Department of Natural Resources (DNR) are cooperating agencies for the proposed project.

The project is located on Cattle Point Road at the southern tip of San Juan Island in San Juan County, Washington State. Cattle Point Road extends north from Cattle Point at the southern tip of San Juan Island through San Juan Island National Historical Park (Park) to Friday Harbor. The Park is bordered by County and DNR lands. The area of concern is a section of Cattle Point Road within the Park and across the Natural Resource Conservation Area (NRCA) that extends along a curve for approximately 1,750 feet in an east-west direction. This section of road is located on a slope that rises from the Strait of Juan de Fuca to the edge of the bluff approximately 50 feet from the existing roadway. The road traverses the slope at an approximate elevation of 150 feet above sea level. Coastal wind and

wave action is eroding the base of the slope that supports the Cattle Point Road. As erosion continues, the roadway will fail and severely impact vehicular and non-motorized access to the Cattle Point area of San Juan Island.

The purpose of this project is to ensure that vehicular and non-motorized access to the San Juan Island National Historical Park and land outside the Park on Cattle Point will continue in a manner which provides a safe and pleasurable experience for the public while protecting natural, cultural and recreational resources of the Park, NRCA, and the island environment.

Five roadway corridors, and various alternatives associated with them, have been identified as potential means to address the purpose and need of the project. The corridors are identified as follows:

- Corridor 1: existing alignment

- Corridor 2: minor realignment

- Corridor 3: mid-slope alignment

- Corridor 4: ridgeline alignment

- Corridor 5: alignment to the forested (north) side of Mount Finlayson

Within these corridors there are a number of proposed alternatives described in detail in the scoping document, with potential impacts identified. The current level of road design that has been undertaken for each alternative is conceptual. However, FHWA design engineers have undertaken enough conceptual design to know that all of the proposed alternatives could be accomplished. Which, if any, of these should be built will be decided based on the results of the current scoping effort and the environmental impact assessment. It is important to note that the list of corridors/alternatives presented in this document are preliminary ideas, and may change as further studies are undertaken in the NEPA process. The main reason for the scoping effort is to identify, through public and agency participation, all reasonable and feasible solutions to the problem and all issues associated with them. As a result of impacts identified during the scoping effort and due to low public support, Corridors 4 and 5 are being recommended for rejection.

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1. Introduction

The purpose of this report is to document the methods used and results of the Cattle Point Road Environmental Impact Statement (EIS) scoping process, which is being undertaken in accordance with Part 1501.7 Scoping of the Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (NEPA) (40 CFR Parts 1500-1508) and with 23 CFR 771.111 Early Coordination, Public Involvement, and Project Development. The aim of the scoping process is to define the range of actions, alternatives, and issues to be considered in the EIS for this project.

1.1 Lead and Participating Agencies

The National Park Service (NPS) - San Juan Island National Historical Park (Park) is a co-lead agency for this project. The Park is involved with this project as the road is located within the Park and is the major route visitors utilize to access the Park. The Park will assist in project development and resource and impact studies.

The Western Federal Lands Highway Division (WFLHD), Federal Highway Administration (FHWA) is a co-lead agency for this project. The FHWA is involved with this project as funding for the project is being provided through the Public Lands Highway Program. WFLHD will assist in project development and provide design, engineering, and construction services.

San Juan County (County) – Public Works Division is involved as a cooperating agency in the project as they currently maintain the road and right-of-way.

Washington State Department of Natural Resources (DNR) is involved as a cooperating agency in this project as DNR land is located adjacent to the Park and would be affected by the proposed project.

The State Historic Preservation Office, National Oceanic and Atmospheric Administration – Fisheries Division, and US Fish and Wildlife Service were invited to be involved in the project as cooperating agencies. No response to these invitations has been received to date.

Local residents, Native American Tribes, public groups and private parties with an interest in the project have been and will continue to be involved through meetings and written communication.

At this point, these are the only agencies involved in the planning for this project. However, more agencies may be involved as the project progresses and potential impacts are identified.

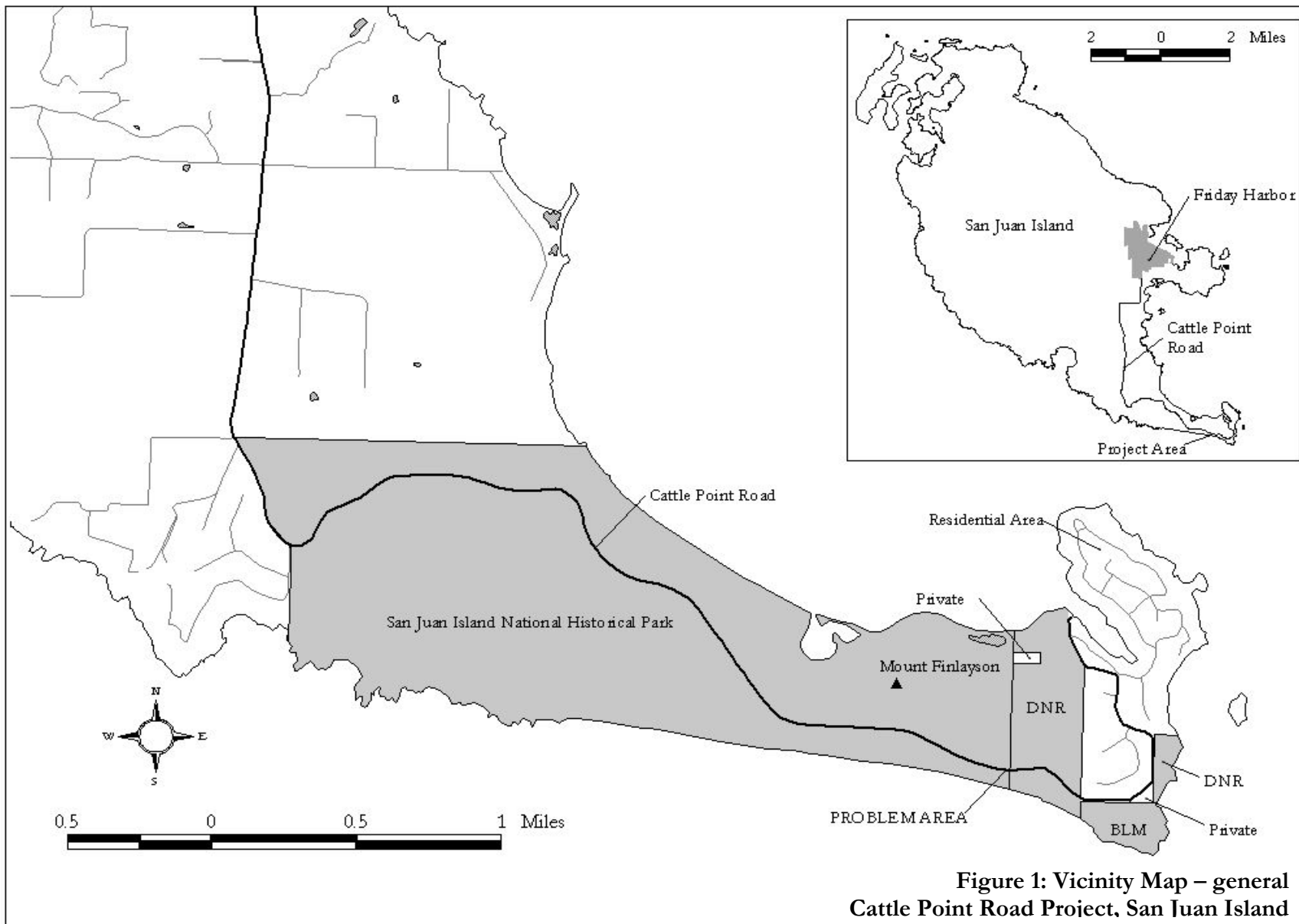
1.2 Location of the Project

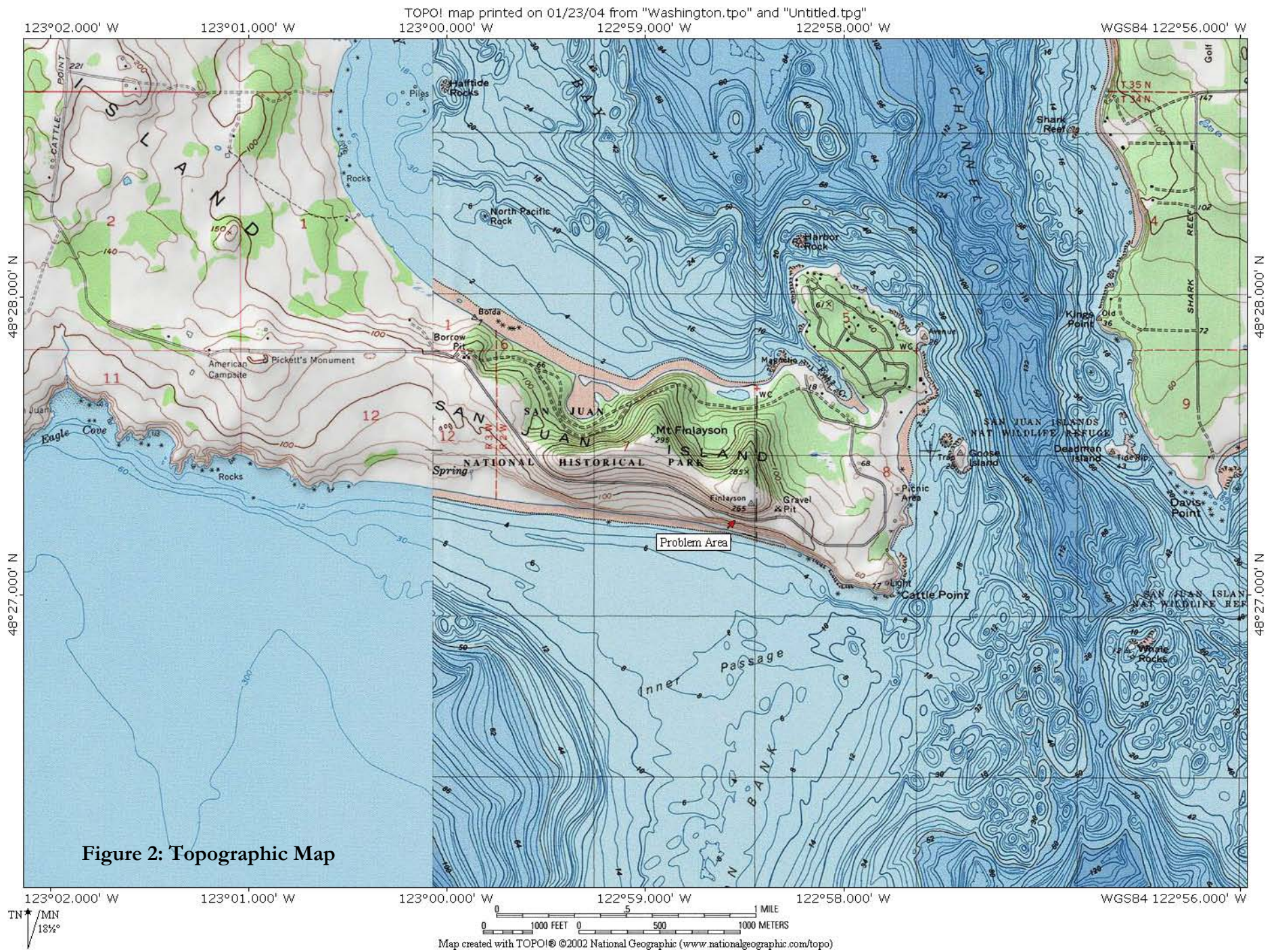
The project is located on Cattle Point Road at the southern tip of San Juan Island in San Juan County, Washington State. Cattle Point Road extends north from Cattle Point at the southern tip of San Juan Island through San Juan Island National Historical Park to the intersection of Cattle Point Road and Madden Lane. The project is located within the following legal geographic area: Township 34 North; Range 2 West; Sections 7 and 8. The Park is bordered by County and DNR lands.

The area of concern is a section of Cattle Point Road within the Park that extends along a curve for approximately 1,750 feet in an east-west direction. This section of road is located on a slope that rises from the Strait of Juan de Fuca to the edge of the bluff approximately 50 feet from the existing roadway. The road traverses the slope at an approximate elevation of 150 feet above sea level. Refer to the vicinity maps provided in Figures 1 and 2.

1.3 Funding

The proposed project is currently funded for preliminary engineering and environmental documentation through public lands discretionary funds obtained by the County and NPS. If an alternative other than the no build is selected, it is anticipated that additional funding will be needed for completion of the environmental process, and to design and construct the selected alternative. The additional funding needed will be requested through the Federal Lands Highway Program (FLHP) and local sources. FLHP funds are available to aid public agencies and Federal Land Management Agencies such as the NPS in providing safe and efficient public roads. The County will seek additional public lands discretionary funds for all phases of the project as needed.





2. Scoping Process

2.1 *Previous Efforts*

A scoping effort for this project was initiated by San Juan County Public Works and San Juan Island National Historical Park in accordance with the NEPA and the State Environmental Policy Act (SEPA). HDR Engineering Inc. performed the engineering work for this project and published the scoping document in February 2002. As discussed in Section 2.2, changes in the project funding, have resulted in a change in the lead agencies and it has been determined that a review and revision of the determinations made during the scoping process undertaken in 2002 is warranted. The scoping process undertaken in 2002 is summarized in the following paragraphs.

The main objectives of the 2002 scoping effort were to:

- Invite federal, state, local and tribal governments to identify significant environmental, social and economic issues related to the proposed project.
- Determine the significance of issues addressed and the depth of analysis needed for the Draft Environmental Impact Statement (DEIS).
- Identify a range of alternatives for the project and any cumulative effects to the Cattle Point area.
- Eliminate issues that do not require detailed analysis and solicit additional study requests to develop appropriate resource information for use in the DEIS.

2.1.1 **Public Involvement (previous scoping)**

Pre-scoping interviews were held during July and August of 2001 with organizations and community members interested in the project. The objective of these interviews was to gain an understanding of the public's concerns and assist the project team in preparing for the public scoping meeting. During this time, information packets were mailed to over 175 people and a preliminary scoping document was made available to the public 30 days prior to the public scoping meeting. The information packets contained a letter of invitation to the public meeting, a project description, a map of the project area, frequently asked questions and a comment form.

The scoping meeting was held on August 29, 2001 in the Mullis Senior Center in Friday Harbor, San Juan Island. The purpose of this meeting was to identify the scope of issues to be analyzed in the DEIS. Verbal and written comments were received and included as part of the public record for the project. The Public Scoping Meeting drew over 70 people, making it one of the highest attended public meetings on San Juan Island. A 3-week comment period was provided following the scoping meeting, after which the comments were reviewed and summarized in the Final Scoping Document. The comments are considered in this document as well and are summarized in Appendix A. Copies of the full comments are available for review at the San Juan County Public Works Department.

2.1.2 Requests for Information (previous scoping)

As a part of the previous effort, requests for information relevant to the project were sent to federal, state, local and tribal agencies and the general public prior to the scoping meeting. This provided an opportunity for these parties to submit pertinent information that could assist the project team with analysis and implementation of the Cattle Point Road Project. Responses to requests were submitted at the scoping meeting or in writing prior to the end of the comment period (September 20, 2001). Information submitted included relevant data, reports, or other documentation supporting project concepts/decisions.

2.1.3 Environmental Analysis (previous scoping)

The previous effort proposed eleven alternatives. Environmental analysis needs were identified for each of these, including an assessment of the existing conditions, project impacts (including a comparison of the alternatives), appropriate mitigation measures, and compliance with environmental laws/regulations. The environmental parameters recommended for analysis were: topography, soils and geology; air quality, cultural resources, land use, hydrology/waterways, wetlands, fish & wildlife, vegetation, recreational resources, aesthetics, and energy/utilities. In addition, it was stated that alternatives involving adding a new road/road alignment through the national park would be evaluated against the following criteria:

- There is no feasible and prudent alternative.
- All possible planning has taken place to minimize and mitigate adverse effects to the park.

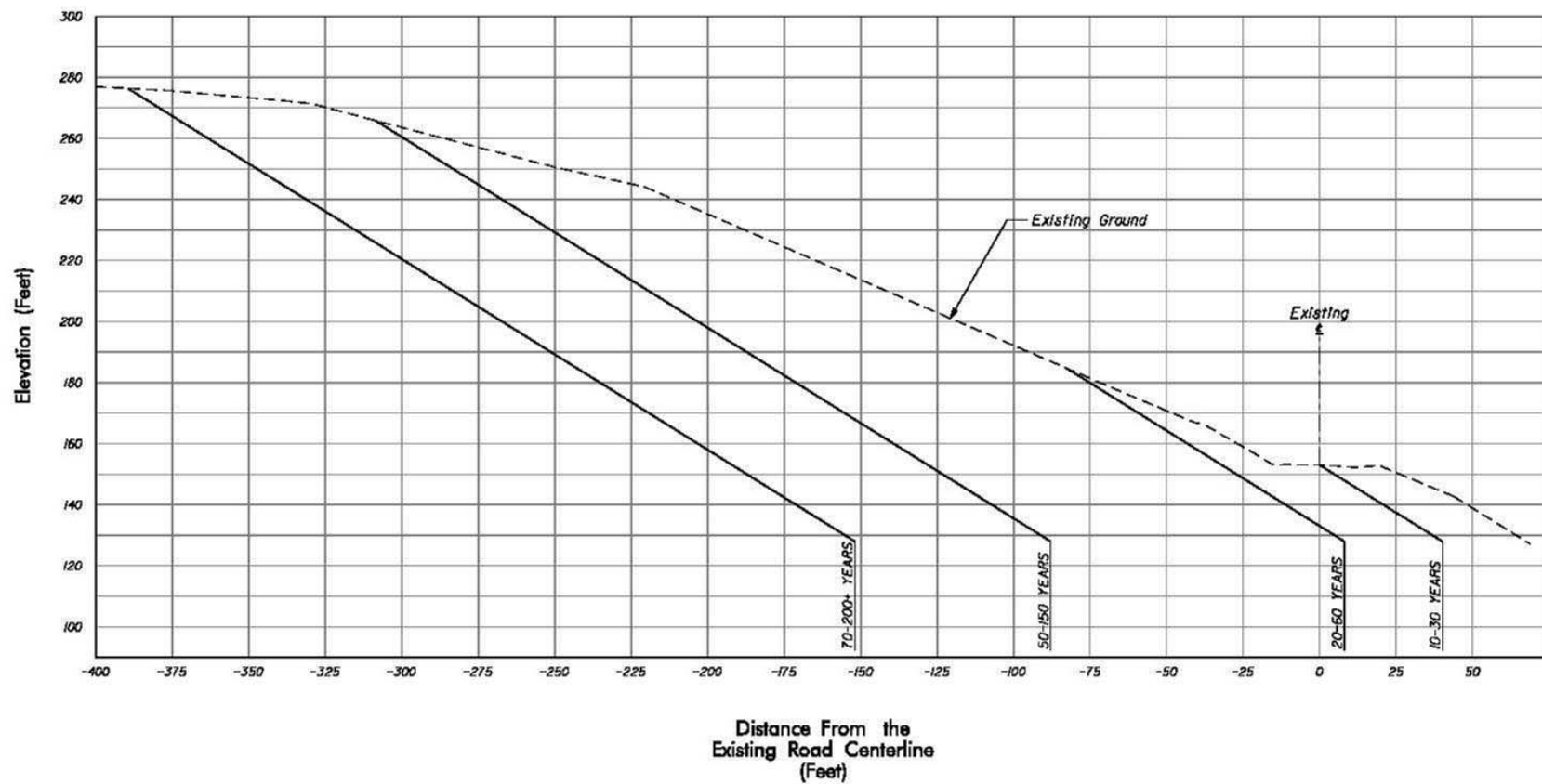
- The alternative will not be contrary to or inconsistent with public interest or the purpose for which the park was established.
- The alternative will not cause health or safety risks to residents, visitors or park staff.
- The alternative will conform to NPS standards and practices for road design, engineering and construction.

2.2 Current Process

The current scoping process is being undertaken in accordance with Part 1501.7 Scoping of the Regulations for Implementing the Procedural Provisions of the NEPA (40 CFR Parts 1500-1508) and with 23 CFR 771.111 Early Coordination, Public Involvement, and Project Development. The regulations detail activities required as part of the scoping process and also stipulate that ‘if substantial changes are made later in the proposed action, or if significant new circumstances or information arise which bear on the proposal or its impacts, the lead agency shall revise the determinations made as a result of the previous scoping effort’. As the project is now proceeding under federal funds through the FHWA, the lead agencies have changed and the project must meet the requirements of the FHWA in addition to NPS regulations. Subsequently the involved agencies have determined that the previous scoping document is inadequate and that a revised scoping process is warranted for this project. Therefore, in accordance with the regulations, the following activities have been undertaken under the revised scoping process:

- All Federal, State, local agencies, and tribes known to be affected, the proponent of the action, and any other interested parties have been invited to participate in the scoping process. Stakeholders who were invited to participate, activities undertaken as part of public participation, and comments received are documented in Section 5.2.1 and Appendix A of this report.
- As a result of stakeholder participation, the scope and the significant issues to be analyzed in depth in the EIS have been determined and are documented in this report.
- Issues which are not significant or which have been covered by prior environmental review have been identified and eliminated from detailed study, and are documented in this report.
- Assignments for preparation of the EIS have been allocated among lead and cooperating agencies, with the lead agencies retaining responsibility for the EIS.

- Any public EA and other EISs which are being or will be prepared that are related to but are not part of the scope of the EIS for this project have been researched and are documented in this report.
- Other environmental review and consultation requirements have been identified and are documented in this report so that the lead and cooperating agencies may prepare other required analyses and studies (such as those required under the Endangered Species Act and under the National Historic Preservation Act) concurrently with, and integrated with, the EIS.
- The relationship between the timing of the preparation of environmental analyses and the agency's tentative planning and decision making schedule has been determined and is documented in this report.



Note:

The estimated bluff retreat ranges are based upon a 1'-3.2' per year rate.

**ESTIMATED RATE OF
BLUFF RETREAT**

**FIGURE
3**

3. Purpose and Need

3.1 Project Purpose

The purpose of this project is to ensure that vehicular and non-motorized access to the San Juan Island National Historical Park and land outside the Park on Cattle Point will continue in a manner which provides a safe and pleasurable experience for the public while protecting the natural, cultural and recreational resources of the Park, NRCA, and the island environment.

3.2 Project Need

Coastal wind and wave action is eroding the base of the slope that supports the Cattle Point Road. As erosion continues, the roadway will ultimately fail. It is expected that this failure will terminate vehicular access and severely impact non-motorized access to the Cattle Point area of San Juan Island. Alternative road alignments and various engineering concepts need to be explored to address this structural problem and provide resource protection. Alternative solutions will be evaluated against environmental concerns to assess the natural, cultural, scenic and socio-economic effects for implementing any one of the alternatives to be studied. The predicted life span of each alternative will also be a factor of consideration. The alternative solutions will be compared to the No Action alternative to find the alternative that best fulfills the purpose and need. The preferred alternative will also be consistent with the land management plans of the Park and NRCA as both Park and DNR lands are affected by the proposed project.

3.3 Erosion Studies Conducted to Date

Two erosion studies of the bluff have been completed to date, one by Landau Associates (January 2002) and another by Lindsey Baumann (May 2002). Landau Associates used aerial photographs taken in 1970, 1980, and 2001 to measure the rate of retreat at both the top and toe of the bluff in eight locations within the area of concern, i.e., where the road is closest to the bluff. Error due to differences in scale and difficulty in clearly identifying the bluff edges was estimated to be less than ten percent. Landau Associates calculated the rate of retreat at the top of the bluff to average 1.3 feet/year and the rate of retreat at the toe of the bluff to average 3.2 feet/year. They concluded that the rate at the toe of the bluff is most applicable to planning purposes as retreat at the toe will translate to retreat at the top over time.

Subsequently they calculated the current road life to be approximately six years. FHWA's Senior Geotechnical Engineer discussed Landau's study with the USACE and concluded that although they did not have orthogonally rectified photos, Landau's approach was reasonable, and that the accuracy of the results are within the 'range' of what could be expected.

Baumann (May 2002) measured the rate of retreat at the top of the slope from sixty reference points over a period of one year. She found that the rate of retreat at the sixty study sites ranged from 0 to 40 inches in a year. The average rate of retreat was 1.3 feet per year which corresponds with Landau Associates findings. Baumann stated that a comprehensive study on the rate of erosion would need to take place over several years; however, a large failure could also occur at any time. Local oral history recalls major slumps, resulting in the loss of up to fifteen feet of the cliff edge in the early 1900s.

A public comment received from the Cattle Point Home Owners Association in March 2004 stated that measurements from the stakes installed at the top of the bluff by Baumann have continued since the completion of her study. These measurements have been done in concert with the NPS and have followed the same protocol established by Baumann. The most recent measurements were made on February 7, 2004. Based on data collected from April 2001 – February 2004, the rate of retreat at the top of the bluff is calculated to be 0.93 feet per year. Distances from the guard rail to the edge of the bluff were measured by Cattle Point residents in February 2004. The closest distance to the top of the slope was found to be 36.5 feet.

Both of the studies by Landau Associates and Lindsey Baumann stated that coastal wave action is the main cause of erosion at the toe of the slope which results in instability and failure farther up the slope. Wind erosion (particularly under dry conditions) also contributes to slope instability and may directly contribute to retreat at the top of the bluff. Due to the high permeability of the soils, little erosion is attributed to surface water. Human foot traffic was also cited as a cause of slope instability at the top of the bluff. However, the main cause of slope retreat is erosion at the toe of the slope, which eventually translates into erosion upslope.

The need for the project has been based upon the information provided by these studies which show that as erosion continues, the roadway will fail and severely impact vehicular and non-motorized access to the Cattle Point area of San Juan Island. Recognizing the potential limitations associated with the above described studies, a broad range in the rate of erosion of 1'-3' per year on a 32 degree slope is being used to help guide the development of the alternatives. Predicted erosion for ranges of years based on these rates is shown in Figure 3. This range more reasonably reflects the limited ability to estimate the erosion rate and the variability in the rate of erosion, yet still provides a conceptual idea of the design life for each alternative. The data from which the rate of erosion has been derived is judged to be appropriate considering the time frame, information and technology available. This range provides a level of precision adequate to meet the needs of the scoping process.

4. Alternatives

This section of the document discusses the construction alternatives identified to date to address the purpose and need for this project. The current level of road design that has been undertaken for the alternatives presented in this document is conceptual only. At this point, the details of the design (such as the exact size of anticipated cut and fill slopes, the exact dimensions of any structures, or the precise location of proposed alignments) are not known. However, FHWA design engineers have undertaken enough conceptual design to know that all of the proposed alternatives presented here could be built. Which, if any, of these should be built, will be decided based on the results of the scoping effort and the environmental impact assessment (which will be documented in an EIS). It is important to note that the list of alternatives presented here are preliminary ideas, and may change as further studies and public review are undertaken in the NEPA process. The main reason for the scoping effort is to identify, through public and agency participation, potential solutions to the problem and all issues associated with them. Any proposed alternative must meet the purpose and need of the project. The need for safety appurtenances (such as guardrails) will be addressed and analyzed later in the design process.

4.1 Existing and Proposed Design Conditions

Any alternatives involving realignment of the roadway will be designed to meet NPS design standards and the appropriate American Association of State Transportation Officials (AASHTO) standards when referenced by the NPS Standards. The standards may be changed if further analysis determines that a change is warranted and safety is addressed. The erosion rates of the bluff also contribute to the design process. Figure 3 depicts the bluff retreat based on a rate of 1 – 3 feet. The Park road design standards will be used for this project as it is located within San Juan Island National Historical Park. Note that other sections of Cattle Point Road (beyond the Park boundary) have been designed and built based on the County standards. An adequate transition between these two standards will be provided at each end of the project (where the County and Park roads meet). Refer to Figure 4 which depicts the Park and County standards.

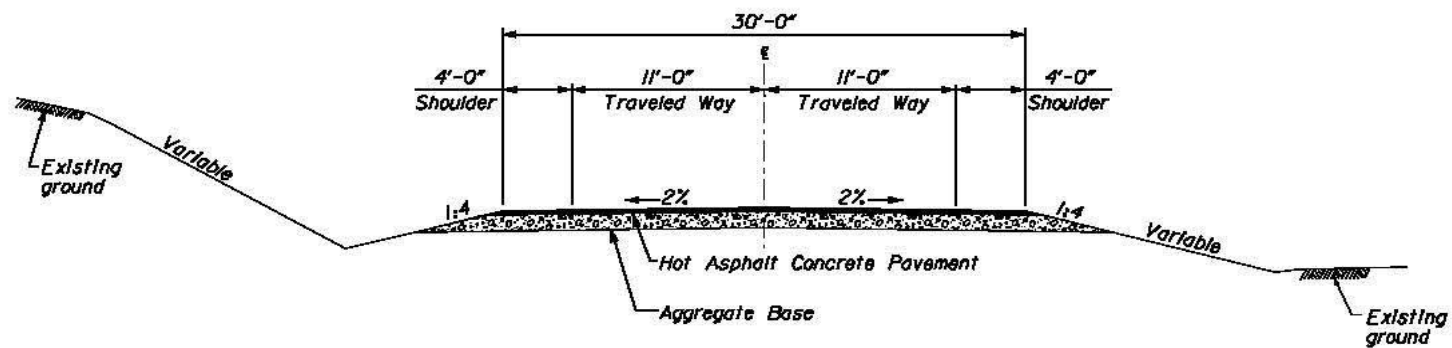
Existing conditions information from San Juan County currently being used to develop the alternatives are as follows:

ADT (2003):	460 VPD
ADT (2026):	812 VPD (based upon 2.5%/year growth rate)
85 th percentile Speed:	40-50 MPH
Accident History:	No accidents in the project area within the last five (5) years
Functional Classification:	Rural Minor Collector
Terrain:	rolling
Current Posted Speed:	45 MPH

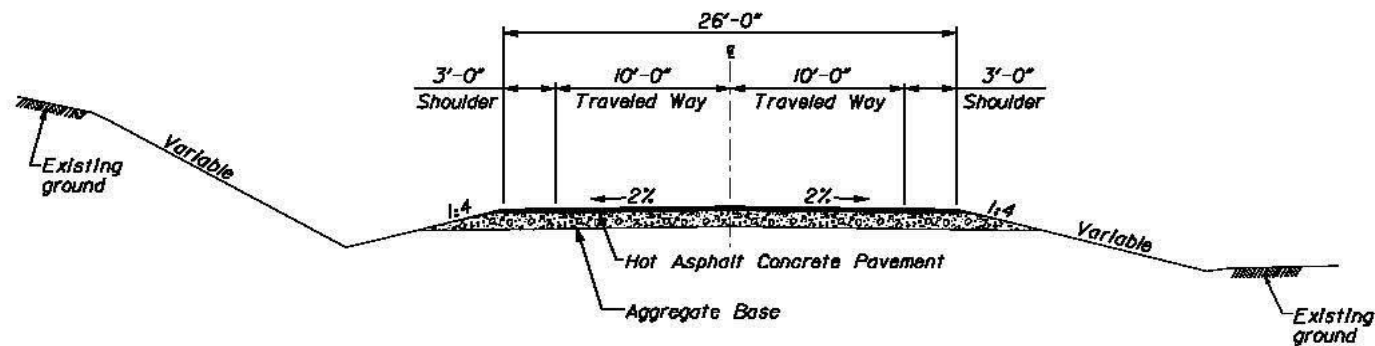
Conditions proposed for development of alternatives involving roadway realignment:

Design Vehicle:	SU-30: A 30 foot long single unit truck with two or more axles (e.g. a local delivery truck or a recreational vehicle)
Design Speed:	35 MPH
Design Standards:	NPS / AASHTO
Traveled Way Width (2-lane):	20 feet
Shoulder Width:	3 feet each side
Grades:	9% max.

There is a high volume of use by non-motorized and alternative vehicles. Road shoulders will be necessary, as non-motorized and alternative vehicles travel at considerably slower speeds than standard motor vehicles, particularly when climbing grades.



COUNTY STANDARD TYPICAL SECTION



PARK STANDARD TYPICAL SECTION

Figure 4: NPS and County Road Standards

4.2 Roadway

Five roadway corridors have been identified as potential routes for the current roadway in the vicinity of the problem area. These are identified as Corridors (1) – (5). Several alternatives have also been identified within Corridors (1), (2) and (3). The text below summarizes the location and key characteristics of each corridor and any alternatives associated with them. Refer to Figure 5 for a map showing the five proposed corridors. Although the corridors are shown as lines on this figure, the intention of the corridors is to cover a general area in a wide path that will have similar characteristics and impacts to analyze.

Based on inter-agency discussion and public comments received during the scoping process, several of the alternatives are being recommended for rejection. The first half of this section discusses the alternatives that are being proposed for further analysis in the DEIS. The second half of this section discusses the alternatives that are being recommended for rejection as a result of the scoping process. Once a corridor and all alternatives within it have been rejected, that corridor will not undergo further analysis in the DEIS. However, all alternatives and reasons for rejecting them will be documented in the DEIS. Alternatives may be added and/or refined within the corridors that are moved forward to the DEIS.

A variation at the eastern terminus of the project corridors was also considered. This would involve moving a section of the existing road, located beyond DNR land, away from an eroding bluff to the north in order to extend the life expectancy of the roadway. However, since the roadway is estimated to have at least a 50 year life span in this location, this variation has been dropped from further consideration. Note that none of the proposed alternatives would prohibit revisiting this option at a later date other than the no build.

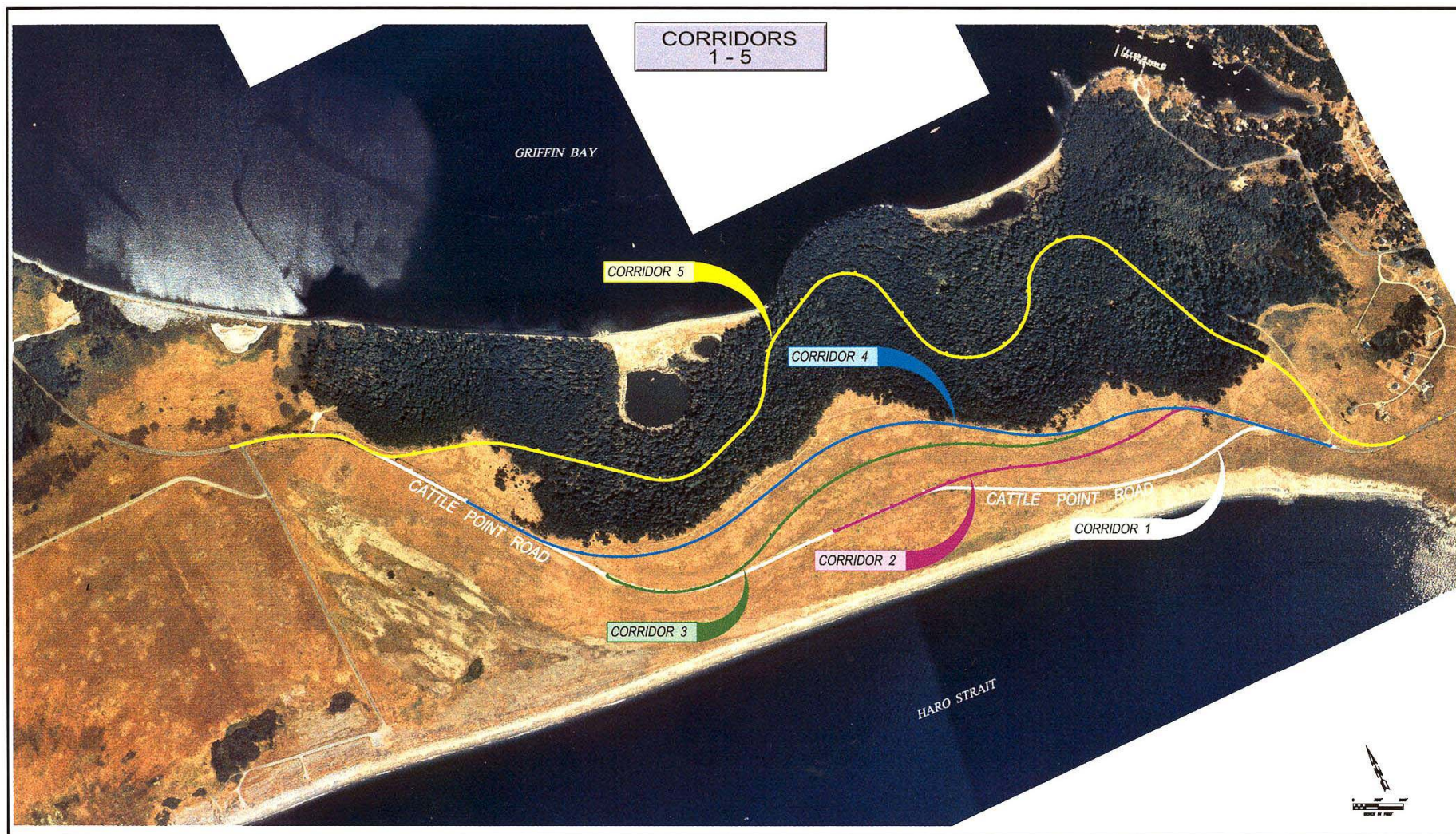


Figure 5: The five proposed road corridors

4.2.1 Corridors / Alternatives to be addressed in the EIS

Corridor 1 (Existing Alignment)

This corridor would be on or near the existing alignment.

Alternative 1NB – (no build)

This alternative is located on the existing alignment. Under this alternative no work would be undertaken to address the current problem. The roadway is expected to have the following characteristics:

- | | |
|-------------------------------|--------------|
| - Road grades: | Existing |
| - Road length: | Existing |
| - Estimated life of the road: | 5 – 20 years |

There would be no initial impacts as a result of this alternative. Anticipated issues associated with this alternative are: the roadway would fail in five to twenty years, eliminating vehicular access to portions of the Park and Cattle Point and necessitating an emergency fix that may have undesirable impacts. This alternative would not meet the purpose and need of the project because it does not address the problem.

Corridor 2 (Minor Realignment)

This corridor is a minor realignment away from the existing roadway.

Alternative 2RA – (minor realignment)

This alternative involves minor realignment of the roadway away from the bluff. This would increase life expectancy of the road compared to Corridor 1. A substantial waste area is anticipated to be needed for this alternative, and would be located offsite. Depending on the quality of the existing soils, little or no earthwork material would need to be imported to the site. The roadway is expected to have the following characteristics:

- | | |
|-------------------------------------|----------------------------|
| - Road grades: | Moderate (+7.0% and –7.0%) |
| - Length of realigned road section: | 3,500 feet |
| - Estimated life of the road: | 40-100 years |

Anticipated issues associated with this alternative: this alternative would pass through grassland habitat, have large exposed cuts and/or walls, is likely to change the views from the ridgeline and from the ocean.

Any alignment that moves the roadway upslope from the current alignment would have to provide a means to allow for the new roadway to traverse steep existing slopes on the east end of the Mt. Finlayson ridge. There are two variations within this alternative to address this issue:

- 1) Construct an open cut through the ridge of Mt. Finlayson. This would reduce road grades, however, anticipated issues associated with this variation are: an increased visual impact and the generation of excess material that would need to be disposed of at an offsite location.
- 2) Steepen roadway grades (flexibility in the design standards would be necessary to do this). This would reduce visual impacts but is also expected to impact safety and drivability.

Alternative 2TU – (soft bore tunnel on minor realignment)

This alternative would be built on a similar alignment to Corridor 2RA. A bored tunnel would be constructed to minimize impacts to prairie habitat and increase life expectancy by moving into the hill. A small waste area is anticipated to be needed for disposal and would be located off site. The roadway is expected to have the following characteristics:

- Road grades:	Moderate (+1% and -7%)
- Length of realigned road:	2,900 feet
- Length of tunnel section:	1900 feet
- Estimated life of the road:	75+ years

Anticipated issues associated with this alternative: this alternative would disturb grassland/prairie habitat; however, the amount of disturbance would be much less than for the other alternatives, as the realignment section is relatively short and approximately two thirds of it would be within a bored tunnel. This alternative is expected to result in less change to the views from the ridgeline and from the ocean as compared to Corridor 2RA, although some impacts to these viewsheds may occur as a result of the tunnel openings. This alternative would have less impact on quality of visitor experience along the ridgeline hiking trail than other action alternatives. Views from the roadway would be impacted and may be mitigated for by providing a viewing turnout. Non-motorized traffic would need to utilize the existing ridgeline trail and/or have a travel way attached to the

roadway shoulders. The cost to construct this alternative is anticipated to be significantly higher relative to the other alternatives. Due to the less common nature of this alternative, it will require a more detailed cost analysis than the other alternatives in order to generate an equivalently accurate cost estimate.

There are two variations within this alternative:

- 1) Constructing one-lane rather than two-lanes in the tunnel. This variation of the tunnel alternative may reduce impacts to the natural environment and is also expected to reduce cost. However, it would reduce traffic flow and may also reduce safety.
- 2) The possibilities regarding bike lane(s) with the tunnel option need to be determined. Moving bikes out of the tunnel would improve safety, reduce width requirements, and provide a better visitor experience. It is currently proposed to locate the bike path on the north side of Mt. Finlayson along the existing trail.

Corridor 3 (Mid-slope Realignment)

This corridor would be located farther upslope than Corridor 2. The road would traverse the mid-slope bench above the problem area, extending the life expectancy of the road.

Alternative 3RA (mid slope alignment)

This alternative would be built predominantly in the middle of the south-facing slope, thus moving the roadway farther away from the bluff than Corridor 2 and extending the life expectancy of the roadway. Alternative 3RA is expected to require a small waste area for excess earthwork.

Alternative 3RA is expected to have the following characteristics:

- Road grades: Moderate (+1.5% and -7.0%)
- Length of realigned road section: 5,800 feet
- Estimated life of the road: 90-200 years

Anticipated issues associated with this alternative: this alternative would pass through grassland habitat and is likely to change the views from the ridgeline and from the ocean. It involves a longer realignment and area of impact than Alternative 2RA, but the life expectancy would be longer than

for Corridor 2. Non-motorized traffic would need to utilize the existing ridgeline trail and/or shoulders attached to the travel way.

There are several variations within this alternative:

- 1) The re-alignment section could start farther west which would lengthen the road and associated area of impact, but may also reduce cuts and provide more level grades.
- 2) Construct an open cut through the ridge of Mt. Finlayson on the steep east side of the ridge. This would reduce grades, however, anticipated issues associated with this variation are: an increased visual impact and the generation of excess material that would need to be disposed of at an offsite location.
- 3) For the same section of the alignment discussed in (2), make the grade steeper (flexibility in the design standards would be necessary to do this). This would reduce visual impacts but is also expected to impact safety and drivability.
- 4) For the same section of the alignment discussed in (2), construct a cut and cover tunnel. This would lessen the visual impacts of a large through cut, provide more gradual grades, and yield minimal excess material. However, the cost to construct the tunnel is anticipated to be high relative to the alternatives that do not involve tunnel construction. Due to the less common nature of constructing a cut and cover tunnel, this alternative will require a more detailed cost analysis than the other alternatives in order to generate an equivalently accurate cost estimate.

4.2.2 Corridors /Alternatives considered but rejected

Alternative 1SS - (slope stabilization)

This alternative is located on the existing alignment. Under this alternative, erosion control measures would be used to stabilize the bluff (both the toe and the top of the bluff) and roadway.

The roadway is expected to have the following characteristics:

- | | |
|-------------------------------|----------|
| - Road grades: | Existing |
| - Road length: | Existing |
| - Estimated life of the road: | Variable |

Anticipated issues associated with this alternative: stabilizing the upper portion of the slope will not address the problem, which is erosion at the base of the slope. Stabilization of the base of the slope

would be against NPS management policy and based on NPS experience is likely to have consequences that are difficult to predict or manage over the long term.

This alternative is recommended for rejection as stabilizing the toe of the bluff is contrary to the NPS Management Policy 4.8.1.1, Shorelines and Barrier Islands, while based on NPS experience, it is not likely to be a long term solution and is likely to have impacts that are difficult to predict or manage. NPS Management Policy 4.8.1.1 states that: “Natural shoreline processes (such as erosion, deposition, dune formation, overwash, inlet formation, and shoreline migration) will be allowed to continue without interference”. Stabilizing the toe of the slope would affect the natural process of shoreline erosion and deposition. Shoreline erosion and deposition in the Cattle Point Road slide area is a very powerful natural process influencing many other facets of the surrounding environment. Experience in other shoreline areas of the country and the world has shown that interfering with such processes often begins a cycle of expensive treatments that must be repeated at intervals. The environmental impacts at the site and over a much larger shoreline, tidal, and marine area have often been larger than expected and stabilization efforts have commonly moved problems to other areas rather than solving them permanently. In the case of Cattle Point, although it is possible from an engineering standpoint to stabilize the toe of the slope in a short-term sense, it is not possible to predict with any certainty the long-term costs or impacts of stabilization efforts. However, examples elsewhere make it reasonable to expect that both costs and impacts could be very large. It is also not possible to determine in advance how such impacts might be mitigated. Because there are other land-based alternatives for dealing with this situation, for which it is possible to predict the costs and impacts, and because there are known methods for mitigating those impacts, the shoreline stabilization alternative has been considered but rejected.

Alternative 1BR - (bridge)

This alternative is located on the existing alignment. Under this alternative a bridge would be constructed near the existing alignment along the length of the section of roadway which is expected to erode. Over time the material under the bridge would erode, leaving an exposed structure. The amount of fill that would be needed for this alternative is unknown. The roadway is expected to have the following characteristics:

- Bridge/road grades: Existing

- Bridge length: Over 1500 feet
- Estimated life of the bridge/road: 100+ years

Anticipated issues associated with this alternative: this alternative would eventually change the views of the island from the ocean. As the bluff erodes, the bridge would be left exposed and is expected to significantly visually impair views of the island from the ocean. Relatively little disturbance to the surrounding environment, as compared to Corridors 2 – 5, would occur during construction of this alternative as it would be placed near the existing alignment. While initially it has few or no impacts, long term impacts would be significant. As erosion occurs the large structure (constructed of unfinished concrete) would be exposed, substantially altering the natural and historic views. Non-motorized vehicles would need to utilize the existing ridgeline trail and/or have access attached to the road shoulders. This alternative is expected to be significantly more expensive to build than some of the other alternatives, but may provide a long term solution. This alternative may also have seismic issues associated with it.

This alternative is recommended for rejection for a number of reasons. Although the benefit of the bridge option is that there are few immediate impacts and it would be a long term solution; its long term visual impacts are anticipated to be significant. The bridge would need to be a large structure requiring foundations deep enough to remain below erosion levels and achieve suitable bearing and foundation values. This could require foundation depths of unusual dimensions (a minimum of 200 feet deep). As the bridge would be built ‘underground’, it would not be possible to provide a finished surface to the structure. As the bluff erodes, the large structure (constructed of unfinished concrete) would be left exposed and is expected to significantly visually impair views of the island from the beach and ocean. Such visual impacts may also contradict NPS policy.

The size of the bridge and its relatively unique nature would contribute to the cost of design and construction. The cost of determining the viability of this alternative would be high. In addition, the bridge could well require future phases of extension to lengthen the structure in order to keep up with erosion rates if they accelerate. Long term maintenance costs associated with the bridge alternative could also be high. In order to reduce the cost of bridge construction, a one-lane versus a two-lane bridge could be built. Although this would reduce construction cost, it would increase

travel time and result in additional visual impacts including signal poles, masts and heads, and colored lights.

Both cost per unit of life span and magnitude of visual impact are unknown measures of high risk causing the bridge alternative to be the most speculative of the alternatives identified to date. A long term solution that would have little long term impact is a more desirable solution to be carried forward. If costs are not prohibitive, the bored tunnel would provide this alternative.

Corridor 4 (Ridgeline Realignment)

This corridor would be located generally along the top of the ridge; although it could vary in alignment to the north, south, or top of the ridgeline.

Alternative 4RA – (ridgeline alignment)

This alternative would be built predominantly on the ridgeline. The roadway is expected to have the following characteristics:

- Road grades: Steep (+8% and -7.0%)
- Length of realigned road section: 6,800 feet
- Estimated life of the road: 150+ years

Anticipated issues associated with this alternative: this alternative would be located on part of the existing ridgeline trail and would pass through fringe/transitional habitat between the prairie and the forest. Views from the road would be significantly different from the current condition. Exposed cuts would be substantial, and the length of realignment would be significant. Non-motorized ridgeline trail traffic would need to be relocated or attached to the roadway shoulders under this alternative.

This alternative was recommended for rejection for the following reasons. Alternative 4RA would have extensive impacts to the sensitive forest/grassland fringe habitat, and established recreational trails. Aside from Alternative 5RA this alternative is longer than other realignment alternatives and has an associated larger area (estimated at over 10 acres) of impact, while providing little if any additional design life. Public response was largely unfavorable to this alternative due to these

impacts. The public were particularly concerned about impacts to the ridgeline trail. Furthermore, while locating the road on the ridgeline may shield the road from some viewsheds, the viewshed from the historic Robert's Redoubt at American Camp would be marred by the need for a large through cut which would be necessary for the road to reach the ridgeline elevation from the west side. The Redoubt was built for gun placement during the "Pig War" crisis and is of high historical significance to the Park.

In summary, other alternatives will meet the purpose and need of the proposed project with fewer impacts; therefore this alternative is being dropped from further consideration because it does not meet the project purpose which requires the protection of natural, cultural and recreational resources of the Park, NRCA, and the island environment.

Corridor 5 (North-side Alignment)

This corridor would be located on the north side of the ridgeline.

Alternative 5RA – (north side alignment)

Under this alternative, the road would be moved to the north side of Mount Finlayson, thus moving the roadway beyond the foreseeable influence of the erosive processes currently threatening it. A small off site disposal area would be necessary for this alternative. The roadway is expected to have the following characteristics:

- Road grades: Flat (vary 1%–4% with an isolated 7%)
- Length of realigned road section: 11,000 feet
- Estimated life of the road: 200+ years

Anticipated issues associated with this alternative: this alternative would be located on the north side of the ridgeline and would pass through forest, impacting the trail system and forest habitat. The bluff and impacts to the grassland area are completely avoided, maximizing life expectancy. Views from the road would be significantly different than the current condition. The realignment would have relatively flat grades but the length would increase substantially. Non-motorized vehicles would need to utilize the existing ridgeline trail and/or have access attached to the road shoulders.

This alternative was recommended for rejection for the following reasons. Alternative 5RA would have extensive impacts to the forest habitat (outright clearing of forest as well as fragmentation of forest habitat), and to recreational trails. This alternative may also impact the watershed and subsurface flows to the lagoons at the base of the forest slopes and forest fragmentation. The third lagoon was purchased with Washington Wildlife and Recreation Program funds which would require a lengthy easement petition process. This alternative is the longest realignment alternative and has an associated larger area of impact than any other alternative and may have unacceptable watershed impacts. The public was largely unsupportive of this alternative, due to these impacts.

In summary, other alternatives will meet the purpose and need of the proposed project with fewer impacts; therefore this alternative is being dropped from further consideration because it does not meet the project purpose which requires the protection of natural, cultural and recreational resources of the Park, NRCA, and the island environment.

4.3 Non-Motorized

Non-motorized use along the roadway and in the Park is high. Primary users are bicyclists and pedestrians. Two main options to address this need have been identified to date:

- 1) Attach bike lanes/wider shoulders to the main travel way.
- 2) Build a bike/walking track away from the main travel way.

If the road is moved to a new alignment, the existing alignment could be narrowed and used by non-motorized traffic; however, due to the erosive process, this should not be considered a permanent solution.

The level of concern in the public comments regarding trail impacts exemplifies the importance of the trail system to users. There are popular trails along the ridgeline in Corridor 4 and in the forested north side near Corridor 5. Alternatives within these corridors may significantly impact these trails. A public comment suggested that if alternatives outside Corridor 1 were selected, the trail system could be extended out to the bluff, preferably utilizing underpasses as necessary to connect the new bluff trail to the older trails. As project planning and design develops, minor shifts in both trail and realignment locations within the corridors and other mitigation measures may be used to reduce impacts to the trail system.

5. Comments and Coordination

5.1 *Previous Efforts*

As discussed in Section 2.1 of this document, the first scoping effort for this project was undertaken by HDR in 2001. As part of this effort, pre-scoping interviews were held during July and August of 2001 with organizations and community members interested in the project. A scoping meeting was then held on August 29, 2001 in the Mullis Senior Center in Friday Harbor, San Juan Island. A Notice of Intent (NOI), announcing the intent to prepare an EIS, was published in the Federal Register after the public scoping meeting had taken place.

These comments were reviewed and considered in the current scoping process. A summary of the comments received during the last scoping effort is provided in Appendix A of this document and in the scoping document published by HDR in February 2002. Responses to each of the comments have been included in the renewed scoping effort and are included with the summary of comments in Appendix A of this document. The original submittals of the comments are available for review at the San Juan County Public Works Department.

5.2 *Current Efforts*

5.2.1 Public and Agencies Contacted

In addition to the County and DNR, letters inviting cooperation on the proposed project were sent to the Washington State Historic Preservation Officer, the National Oceanic and Atmospheric Administration-Fisheries Department, and the United States Fish and Wildlife Service due to these agencies' authority related to and potential involvement/interest in the proposed project. To date, responses have not been received from these agencies. The NOI announcing the proposed EIS was published in the Federal Register on February 6, 2004. The mailing list used for distribution of information relating to the project to interested parties, including the announcement of the public meeting, was developed by the Park for general use and was updated (with input from the County) in January 2004.

5.2.2 Scoping Meeting

A scoping meeting was held on February 18, 2004 in the Mullis Senior Center in Friday Harbor, San Juan Island. Invitations were sent to those on the mailing list, and notices were posted in Friday Harbor and published in the Park's website and local newspaper. Two meetings were held, from 1 to 3pm and 7 to 9pm. A total of sixty people attended the meetings. Upon signing in, attendees received a handout depicting the proposed corridors and summary descriptions of the alternatives as well as a comment form. Brief presentations were given by representatives from the County, the Park, and the FHWA. The County representative explained the impetus for the project, federal agency involvement, and the purpose of the public meeting. He reiterated that the process was moving forward and that comments submitted previously had been incorporated and were still valid. The Park representative spoke about the Park's position, mission and role in the process. The FHWA representative described the environmental process and the project schedule, emphasizing that this was the scoping phase, and the proposed alternatives were very open to new ideas, additions, and modifications. It was explained that the corridors shown as alignments in the displays were actually wide paths, representing more of a concept and area than a fixed line. A short question/answer period followed the presentations. A representative from the Cattle Point Estates owner's association then gave a presentation regarding Baumann's study on the rate of bluff erosion. During the remainder of the meeting, attendees examined the exhibits showing the proposed corridors/alternatives, design standards, and the project schedule. Representatives from the County, the Park, the DNR, and the FHWA were available to answer questions and listen to concerns/ideas.

Key comments received during the meetings concerned:

- plans for an imminent failure of the road,
- the width of the corridors,
- the lifespans of the proposed alternatives,
- the lifespan of the existing road,
- whether or not an option would still be viable if it contradicts Park policy,
- exceptions to Park mandates,
- details regarding the processes and people making decisions, and

- the level of consideration public input is given by the decision makers.

Additional comments have also been submitted via comment forms and letters to the co-lead agencies. These comments and responses to them are provided in Appendix B of this document and are available in their original format from the FHWA and the NPS.

Comments received include:

- requests for additional information,
- statements regarding preferred alternatives/corridors of those presented by the project team,
- recommendations for new road/trail alternatives/corridors,
- concerns regarding life cycle cost,
- concerns regarding potential impacts to the natural environment, hiking trails, and view sheds,
- an offer of assistance in undertaking cultural resource investigations from the Lummi Tribe,
- the need for an emergency plan in the event of a catastrophic failure prior to project implementation, and
- recommendations regarding the need for further geological studies in order to more accurately determine the rate of bluff retreat.

6. Project Work Plan

6.1 *Future Public and Agency Involvement*

It is anticipated that in addition to the agencies involved in the project to date, the following agencies and tribes will become involved in the project during the EIS, and permitting phases:

- The United States Fish and Wildlife Service (Endangered Species Act concurrence)
- The State Historic Preservation Office (Section 106 of the National Historic Preservation Act concurrence)
- The Environmental Protection Agency (National Pollutant Discharge Elimination System permit / Section 401 of the Clean Water Act Water Quality Certification, if needed)
- The Lummi, Swinomish, and Samish Tribes (cultural resource survey)

As no in-water work or work in a wetland is anticipated based on the alternatives currently proposed, future involvement of the United States Army Corps of Engineers is not anticipated.

Participation and input will also continue to be invited from the Washington Department of Fish and Wildlife, the National Oceanic and Atmospheric Administration-Fisheries Department and any other agencies with potential interest in the project.

Once the draft EIS is completed (potentially by the end of winter 2004/2005), it will be available for public review during a 60 day public review and comment period. A public open house meeting to discuss the draft EIS will be held during the public review and comment period in spring 2005. Once the final EIS is completed (potentially by the end of summer 2005), a 30-day no action period will begin following the EPA's announcement of distribution of the final EIS, anticipated to occur in Fall 2005. Although only one future public meeting is currently planned, additional public meetings will be conducted if they are warranted.

6.2 Studies to be completed

The following studies will be completed in order to better define the alternatives and assess their impacts on cultural and biological resources. Studies will be initiated in spring 2004 and are scheduled for final completion by the end of winter 2004/2005. Studies shall include both Park and NRCA lands affected by this project.

Cultural Resource Survey:

A Cultural Survey and Inventory will be conducted over the area within the corridors that are to be carried forward to the DEIS, which will entail most of the grassland side of the hill. This Survey will identify any known cultural resources in the area through an archive search, and will include a field survey to search for cultural resources and areas that have a high probability of being culturally significant. More intensive surveys may be conducted once alternatives are better defined and if results of the Survey warrant further evaluation and registration.

Viewshed Assessment:

A visual simulation to conceptually represent all alternatives will be undertaken. Viewsheds simulated will include the view from the lighthouse, the view from the water, the view from Mt Finlayson's west ridge line, and the view from Cattle Point Road at the residential area facing west. The simulation will be intended to represent the appearance of each alternative three years after construction. Due to the sensitive viewshed nature of Robert's Redoubt, all alternatives to be carried forward will be sufficiently screened from the Redoubt view. This viewshed will be monitored and should the screening situation change, a visual simulation will be undertaken to determine the extent of viewshed impacts.

Plant Resource Survey:

Existing NPS survey reports will be reviewed to identify sensitive issues and assess needs for more information. A rare plant survey will be undertaken as needed. A Revegetation and Restoration Plan will be developed and will include information such as the species to be used (including seed sources), weed control methods, length and responsibility of control, and the length and responsibility of restoration maintenance. The effects of construction on

the spread of non-native and native but invasive plants would also be examined. A Threatened and Endangered species list will be obtained from the United States Fish and Wildlife Service to identify Endangered Species Act consultation needs. Further data collection, including potential introduction sites for *Castilleja levisecta*, will be undertaken as deemed appropriate.

Animal Resource Survey:

Existing NPS survey reports will be reviewed to identify sensitive issues and assess needs for more information. A Threatened and Endangered species list will be obtained from the United States Fish and Wildlife Service to identify Endangered Species Act consultation needs. Further data collection, including surveys for the Island Marble Butterfly, will be undertaken as deemed appropriate.

Geotechnical Investigation:

A geotechnical investigation will be undertaken to identify soil parameters for design of any proposed roadway features as well as to identify the impact of the alternatives on erosion. Subsurface investigation, including drilling, may be necessary, particularly in the vicinity of the proposed tunnel locations prior to refining the alternatives.

Additional surveys in the project area will be undertaken as appropriate.

6.3 Project Schedule

The proposed project will continue to follow the NEPA process to determine a preferred alternative. This section narrates the proposed schedule shown in Figure 6.

The next step will involve gathering additional information for the Draft Environmental Impact Statement (DEIS). Resource studies for the DEIS will be initiated in spring 2004 and are scheduled for final completion by late 2004. The surveys will include plant, animal, and cultural surveys. Other surveys will be undertaken as needed. A rare plant field verification may need to be undertaken during the flowing season in spring 2005.

In order to better define the alternatives and their impacts, additional design information will be required. As identified in Section 6.2, a geotechnical investigation including drilling along the alignment of the proposed tunnel will be undertaken in August/September 2004 assuming that this time frame will not conflict with critical time periods in the life cycles of any species that are of concern to the Park. More detailed topographical surveys may be necessary as well, and would be undertaken by FHWA. Once results of the geotechnical drilling are available, the proposed alternatives will be refined.

The results of the draft resource inventories and the proposed alternatives will be assessed during a field review scheduled for August, 2004. The alternative alignments will be defined and any further or more intensive study needs, including the geotechnical drilling will be undertaken following the review. An internal agency meeting to comprehensively evaluate the alternatives through value analysis will be held in October/November 2004.

The draft EIS is proposed to be completed by the end of winter 2004/2005. The draft EIS will then be available for public review. A public open house meeting to discuss the draft EIS will be held during the 60 day public review and comment period in spring 2005.

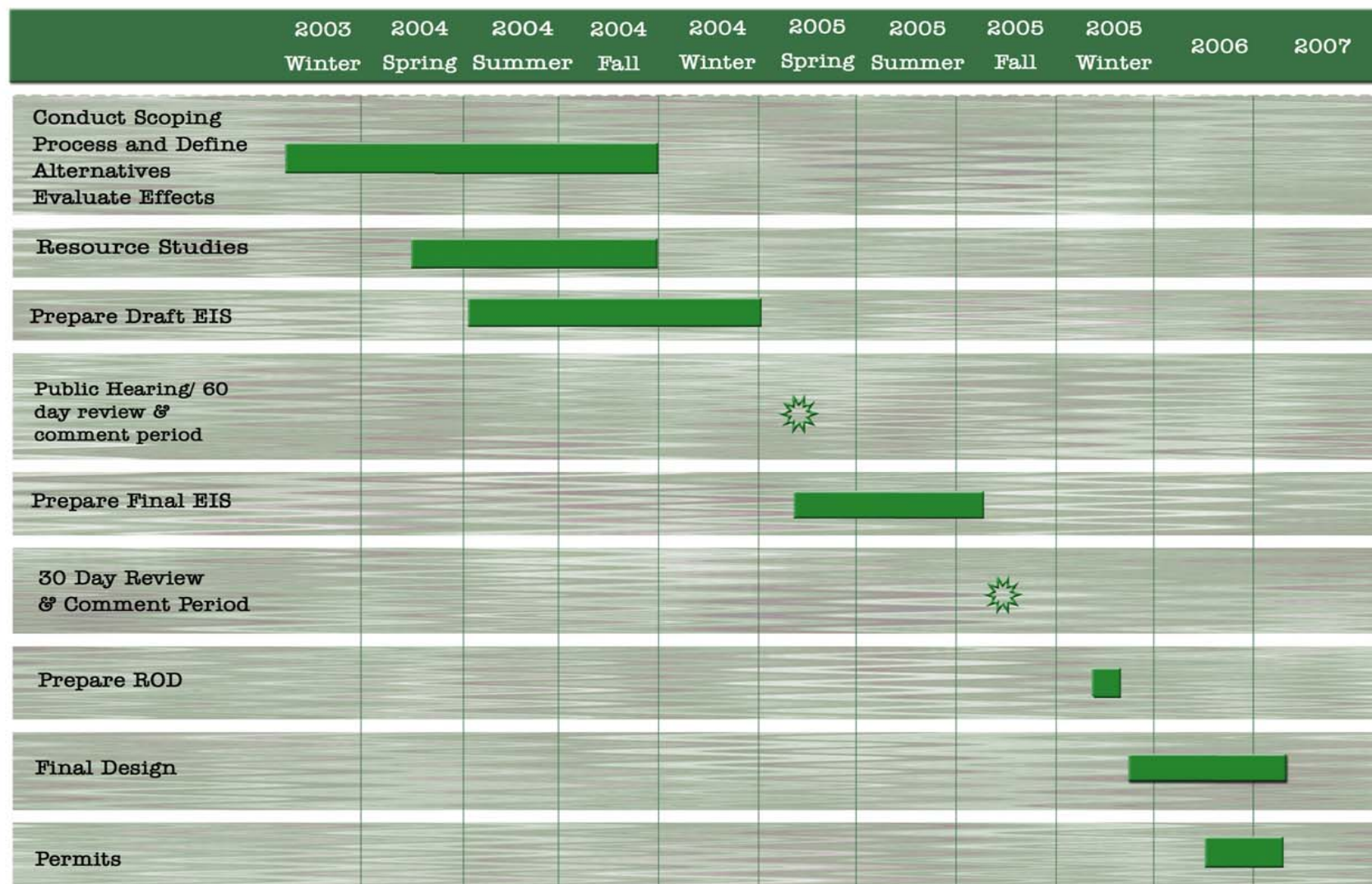
The final EIS is proposed to be completed by the end of summer 2005. The final EIS will be available for public review over a 30 day no action period in fall 2005.

The Record of Decision is proposed to be prepared by the end of 2005. Permitting and final design will be completed by the end of winter (March) 2007. Assuming that funding is available, construction is expected to start in spring/summer 2007.

Refer to Figure 6 for a graphical depiction of the project schedule.

Project Schedule/Development Process

Cattle Point EIS



* A rare plant survey may need to be completed during flowering season between the draft and final EIS.

Figure 6: Project Schedule

7. List of Preparers

This document has been prepared by the WFLHD of the FHWA in cooperation with the NPS, San Juan County, and the DNR. Key personnel from each of these organizations are listed below along with their contact information.

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8. References

Baumann, Lindsey. A Geologic Study of the Factors and Rates of Erosion along Cattle Point Road, Richardson Quadrangle; San Juan Island, Washington. Undergraduate Thesis. May 13, 2002. University of Montana.

HDR Engineering, January 10, 2002. Bluff Retreat Cattle Point Road; San Juan County, Washington.

HDR Engineering, February 2002. Cattle Point Road EIS Scoping Document.

NPS Management Policies (2001).

Appendices

Appendix A: Comments from the 2001 scoping effort

Scoping for the Cattle Point Road Project

Previous Public Comments

We have reviewed the public input from the earlier scoping effort and have incorporated and responded below to comments that are applicable to the current scoping effort. As detailed in the current scoping document (May 2004), changes in funding for this project and changes in the lead agencies have resulted in revised design standards. Consequently the alternatives being considered under the current scoping effort are significantly different from those considered under the previous scoping effort. Therefore, comments that refer to alternatives from the previous scoping effort are not considered in this document. However, issues that were raised in the previous scoping effort that are still pertinent to the current scoping effort are identified and discussed below.

Comments on alternatives from the previous scoping effort that are pertinent to the current scoping effort:

No Action Alternative

- Comment from Cattle Point Estates Owners Association-County is required by law to provide access and emergency services. Environmental impacts to provide this without fixing the road would likely exceed those to fix the road.
- Unacceptable, would threaten resident population

Response to comments and action on alternative: This alternative will be carried through the scoping process as a NEPA requirement. The no action alternative means no action would be planned outside of normal maintenance; the legal responsibilities of the County to maintain access would be addressed if it became necessary by an emergency repair or other unknown action.

Suggested alternatives: (alternatives that are not being considered under the current scoping effort)

-Bridge to Lopez

Response: Not under serious consideration due to cost (would need to be >1 mile long), environmental impacts, and would not provide practical access to the rest of San Juan Island without Cattle Point Road.

Suggested alternatives: (alternatives that have been considered under the current scoping effort)

-Planting/Bioengineering to stabilize slope and prevent erosion

Response: Planting would not substantially affect the erosion rate. More substantial stabilization techniques may be investigated.

-Ferry service

Comment: Dock would impact wetlands at Fish Creek

Response: Would not be practical due to limited times/scheduling, and would not provide for emergency access to Cattle Point.

-Cantilever/bridged road

Response: Bridge has been developed as an alternative (1BR).

-Requests to look at armoring beach, floating breakwater, or sheet pile use.

Response: Contradicts NPS management policy to not interfere with a natural process.

-Requests to look further at tunnel options.

Response: Several options have been developed in the current scoping effort.

-Requests to look at alternative, innovative solutions.

Response: We are seeking ideas on innovative alternative solutions as a part of the scoping process. Input on ideas is encouraged as a part of this process.

-Slight road shift until erosion rate is accurately defined.

Response: The scoping process is using erosion rates determined from historical data and studies. If justified through the development of alternatives, further studies may be necessary. As noted in the current scoping document, the methods

for determining the rates of erosion as well as the rates of erosion have been discussed with the FHWA Senior Geotechnical Engineer and the USACE.

The following issues and comments were raised in the original scoping effort as well as in the current scoping effort and have been considered in the current scoping effort:

- Transportation to residences
- Park access
- Emergency services to area (Aged demographics, high need)
- Long-term solution (50-500 years, not 5-10)
- Economics, responsibility for costs
- Emergency access if roadway fails prior to fix
- Minimal visual impact, pleasing aesthetics
- Roadway safety
- Avoid disruption of trail system, valuable and only resource of its type in this area of the island
- Wildlife habitat protection
- Affect on aquifer (sole water supply for Cattle Point)
- Rate of erosion better quantified (Soil Conservation Service photos from 1940s available)
- Preserve DNR NRCA
- Cattle Point Estates Owners Association comments
 - need for continued access, severe impacts if access is lost, impacts project will have on neighborhood, construction noise, traffic restriction impacts, social and economic impacts need to be considered, particularly an economic study of impacts of failure on merchants, service providers, and builders of San Juan Island, desire to be involved in process, volunteer to provide any info and help on mitigation efforts
- Cape San Juan Water District concerns with aquifer impacts. Any cutting on Mt. Finlayson not impact three wells.
- More than 180 residents (208 lots)
- Road value for access, sightseeing, and recreation on Park/DNR land
- Potential for earthquakes should be considered
- Avoid walls, use seeded cut/fill
- Minimize construction activity impacts
- If roadway is abandoned, use for trail
- Human activity is causing erosion
- Lady Slippers orchids near Jakle's lagoon
- Ridgeline valuable habitat for birds
- Archaeological assessment needed
- Restore roadbed if abandoned
- Avoid tree line area on ridgeline.
- Alternative costs need to be developed.

These issues and comments were raised in the original scoping effort but were not raised in the current scoping effort and therefore have been responded to below:

-Interference with the shoreline erosion process could affect the South Beach and increase erosion elsewhere

Response: Interference with the shoreline process is against NPS management policy, therefore the effects of interfering with the erosion process has not been studied in depth.

-Vehicle/wildlife collisions

Response: The impacts of each alternative on vehicle/wildlife collisions will be studied during the Animal Resource Survey.

-Desire for upgrading trail to make ADA accessible, but not vehicular

Response: Once a preferred alternative is selected impacts to the trails will be identified and minimized and mitigated for. This could be one option for trail impact mitigation and will be further considered at the appropriate time in the design process.

-Integrity and character of the Park (new road would devalue/destroy)

Response: The existing road runs through the Park, as would any new road. Every effort will be made to minimize and mitigate for impacts to the natural and historic Park setting. However, part of the purpose of the project is to maintain access to the Park and the residents of Cattle Point.

-Utilities relocation issues and costs

Response: The only alternative with utilities nearby is corridor five, which has been rejected. Therefore, no other alternative will have an impact on utilities.

-Noise pollution during and after construction

Response: The effects of construction noise will be considered during the alternative selection process. Construction is generally performed during daylight hours. As corridors four and five have been rejected and as they had the greatest alignment change, the remaining corridors are not considered to potentially provide additional noise impacts to sensitive noise receptors.

-Suggested fire road be made into emergency access road for emergency vehicle access in case of failure before implementing permanent solution. (Use gravel and gate)

Response: The County is currently responsible for regular maintenance of the road as well as emergency road repairs and would consider this as a possibility in an emergency situation.

-Water district access required for operator

Response: Corridors four and five may have had an impact on this utility access, but have been dropped from further consideration. The remaining corridors do not have the potential to impact the utilities or utility maintenance.

-Nuttall's quillwort (WA State sensitive species) may be present

Response: As outlined in the current scoping document, pertinent existing survey data will be reviewed from the Park and DNR NRCA, and additional surveys will be conducted if additional information is needed.

-Reverse osmosis lines near ROW need to be protected

Response: The only alternative with utilities nearby is corridor five, which has been rejected. Therefore, no other alternative will have an impact on utilities.

-Runoff effects on fish and eelgrass-evaluate on each alternative

Response: Impacts to fish, wildlife and vegetation will be considered for each alternative during the EIS process.

-Wildlife safety during and after construction

Response: As noted above, the project will take sensitive noise receptors into account when designing the project and wildlife safety during and after construction will be considered during the animal resource survey.

Appendix B: Comments from the 2004 scoping effort

Comments and responses regarding the proposed Cattle Point Project

Comments were received in response to a public notice published on January 22, 2004, the Notice of Intent published February 6, 2004, and a public open house meeting held in Friday Harbor on February 18, 2004.

Comment Received: February 18, 2004

Comment: “I support Alternative 2RA (Realignment) at this time. The least intervention possible. Nature was here way before us, and we chose to live in this spot. The habitat is precious and we are an island, highly sensitive. I also do not believe enough geomorphological research has been done, to verify the rate of erosion and how long it will take before the road is in danger. Stay away from the transition zone and ridge line.”

Response: Alternative 2RA will be advanced to the draft EIS. Corridors 4 and 5 have been recommended for rejection due to strong public concerns and the relatively high level of impacts to biological and recreational resources. The NEPA process will guide identification and assessment of impacts associated with each alternative so that an alternative that best satisfies the purpose and need and minimizes impacts to the natural and human environment is selected. This will include assessing impacts to trail usage and the plant and animal species in the area. In order to better reflect the uncertainty of the rate of erosion, a range of 1-3'/year is being used in alternative analysis. The range provides a general idea of the lifespan of the alternatives. Aerial photography and yearly physical measurements have been used to estimate this range. The data from which the rate of erosion has been derived is judged to be as precise as possible given the information and time frame available.

Comment Received: February 18, 2004

Comment: “I vote for either option 3 or for option 5. #5 is an existing road – may cost less and should last a long time there are wetlands and trail objections. #3 because it would not impinge on the hightrail/woods and very importantly, may last 100 years. Building something to last only 50 years is a waste of money.”

Response: The NEPA process will guide identification and assessment of impacts associated with each alternative so that an alternative that best satisfies the purpose and need and minimizes impacts to the natural and human environment is selected. Alternative 3RA will be advanced to the draft EIS, while Corridor 5 has been considered but rejected due to the level of impacts, including those identified in this comment. The alternative analysis will take into consideration cost and design life as well as biological and cultural impacts.

Comment Received: February 18, 2004

Comment: “1) Consider Rip Rap Toe Of Slope. 2) Consider placing road at tow-of-slope (Rip Rap Road). 3) Consider putting tuteMat to control a slow beach erosion.”

Response: These ideas have been discussed in the development of alternatives as possible solutions. However, this project has two basic goals (which are stated in the purpose and need for the project): to maintain access and to protect park resources. Proposed alternatives that suggest armoring the toe of the slope or otherwise changing the natural shoreline erosion and deposition processes do not adequately protect park resources. National Park Service Management Policy 4.8.1.1, Shorelines and Barrier Islands, states the following: Natural shoreline processes (such as erosion, deposition, dune formation, overwash, inlet formation, and shoreline migration) will be allowed to continue without interference. Consequently, Alternative 1SS is being rejected as it does not meet the National Park Service Management Policy 4.8.1.1 and as NPS experience has shown that it is not likely to be a permanent solution while it is likely to move the problem elsewhere. Refer to Section 4.2.2 of the Scoping Document for a more detailed discussion of Alternative 1SS.

Comment Received: February 18, 2004

Comment: “Please send me any and all information regarding this project.”

Response: Information regarding the project is available for review at the NPS office in Friday Harbor. In general, the project files are available for public review upon request. Specific requests for smaller documents can be sent providing that additional copies are available. Due to the cost and time associated with copying, persons requesting larger documents and additional information will be directed to contact FHWA or NPS and arrange for an opportunity to review the records and make copies of the desired record at the requestor’s expense.

Comment Received: February 18, 2004

Comment: “If you used logs to armor the toe of the slope, it would look like naturally deposited drift wood. You might have to supply invisible ties to ensure stability as for the lip and slope, revegetation might work. It certainly would look natural. Would these measures be trumped by the rule that natural processes must not be interfered with?”

Response: These ideas have been discussed in the development of alternatives as possible solutions. However, this project has two basic goals (which are stated in the purpose and need for the project): to maintain access and to protect park resources. Proposed alternatives that suggest armoring the toe of the slope or otherwise changing the shoreline erosion and deposition processes do not adequately protect park resources. National Park Service Management Policy 4.8.1.1, Shorelines and Barrier Islands, states the following: Natural shoreline processes (such as erosion, deposition, dune formation, overwash, inlet formation, and shoreline migration) will be allowed to continue without interference. Although using logs for stabilization would certainly have a more natural appearance, it would essentially still alter the natural shoreline processes while NPS experience has shown that stabilization of the toe of the slope is not likely to be a permanent solution and is likely to move the problem elsewhere. For these reasons Alternative 1SS is being rejected from further consideration. Refer to Section 4.2.2 of the Scoping Document for a more detailed discussion of Alternative 1SS.

Comment Received: February 18, 2004

Comment: “I reviewed the “Final Scoping Document” (Jan. ’02) posted on the NPS website. The section entitled “Cultural Resources: (Ch. 5, I believe) mentions a preliminary archaeological survey; however, Peter Dederich did not believe that had been completed. Our office (LNTHPO) would appreciate a copy of any such study completed. We would like to assist any contractor hired to complete a “detailed archaeological analysis for each alt.” as proposed. In order to assist, pls. send us a map of any project area and a description of proposed activities. THANK YOU – we look forward to working w/all project partners on the EIS process. Our office is here to assist project partners gather archaeological data not on file w/OAHP, NPS, etc. We facilitate an internal tribal review to identify info. that may be on file at Lummi & not elsewhere.”

Response: Thank you for your interest in this project. Please note that the scoping document to which this comment refers has been superseded by the current scoping effort. The report for the current effort has not yet been published; however, we will provide you with a copy of it when it becomes available. A cultural resource survey for this project has not been done to date. We intend to coordinate with the Lummi, Swinomish, and Samish Tribes prior to initiating a cultural resource survey and will share all information about the project with the Tribal Historic Preservation Offices and cultural departments as it becomes available. Please note that the corridors shown at the scoping meeting were very general in nature and presented only as a way to initiate the discussion. Due to their relatively high level of impact and low public support, two of these corridors (Corridors 4 and 5) will not be carried forward in the NEPA process. We appreciate participation of the tribes in the process and thank them for their offer of assistance.

Comment Received: February 18, 2004

Comment: “Alternative 3-4-5 each impact existing recreation activities. Principally hiking activities (Mt. Finlayson is the only long distance hiking opportunity within public lands on the island). Fed Hwy Act requires replacement in kind. The summary of corridor effects does not speak to this. Each summary states hiking opportunities away from vehicles will be lost. Please identify miles of trails now available that are away from rds. Then give mile of that type of trail lost per alternative – and how it may be replaced in kind. Thank you.”

Response: It is assumed that the commenter is referring to Section 4(f) of the Department of Transportation (DOT) Act of 1966, although that Act does not require replacement in kind, but rather seeks avoidance of use of park land where possible. That Act, however does not apply to park roads. The proposed road project will be the construction of a National Park Service Road. Therefore, Section 4(f) does not apply. We are committed to preserving the values and recreational opportunities in the Park and will avoid, minimize and mitigate for any impacts to recreation that the preferred alternative may have. Note that due to the high level of impact and low public support, Corridors 4 and 5 are being rejected.

Comment Received: February 18, 2004

Comment: “I’m very concerned that whatever the change to the road, it does not impact wildlife, hiking trails & the view along the Straits. I would also like you to address what possible plans are in place if the existing roadway should fail within the next few (2-3) years. How would those of us who live at Cape San Juan/Cattle Point get supplies-there must be some form of plan currently being considered by the county if this becomes necessary. Please don’t keep us in the dark.”

Response: Your concerns about potential project impacts will be addressed in the draft EIS. Due to the high level of impact and low public support, Corridors 4 and 5 are being rejected. At this time the County does not believe that the road is likely to fail within the next 2-3 years. However, in the event of a catastrophic failure in the near future the County and other agencies would deal with the loss of the roadway if/when that happens under emergency laws. We will keep you updated on the project as it develops. Should an emergency situation arise, the County would work closely with the residents of Cattle Point and would ensure that access is maintained.

Comment Received: February 18, 2004

Comment: “1) Request a copy of NPS Policies regarding consultation, repatriation and cultural resources plans? 2) Request copy of early document regarding this process during Jan 2002? 3) NPS and Lummi Schelangen department need to conduct a Traditional Cultural Property Survey or any early document if any? 4) Send all document on window to myself and Swinomish and Samish Tribes or Nation.”

Response: The document to which this comment refers has been superseded by the current expanded scoping effort. Printed information about the current scoping effort was mailed to the Lummi Tribe. As new alternatives are formulated and refined, they will be shared with the public and there will be additional opportunities for the public to comment, as required by the National Environmental Policy Act (NEPA) of 1969. Because of the potential for this project to affect possible native burial sites in particular, elements of the Native American Graves Protection and Repatriation Act (NAGPRA) will apply as appropriate. It is our hope and objective that the culturally affiliated tribes participate fully in the planning process. Plans for survey work will be made later in the process and these plans will be coordinated with the tribe and SHPO. We appreciate the offer of assistance.

Comment Received: February 18, 2004

Comment: “The serious erosion at the base of the cliff supporting Cattle Point Road is caused primarily by wave action undercutting the slope. Please consider stabilizing the slope by using rock revetment to absorb wave energy and prevent further erosion at the base of the cliff which will substantially delay slumping at the shoulder of the roadway. Rocks have been used in other San Juan locations such as east of the Orcas Ferry Landing to prevent

slope erosion. Natural rock outcrops at Cattle Point demonstrate the effectiveness of absorbing wave energy to prevent erosion. Personal observation at Cattle Point shows the greatest erosion occurs at extreme high tides in conjunction with high winds either southeasterly or westerly. Southeasterly swells at 10-12' impact the cliff at 30° from normal incidence carrying sand and debris to the west. Looking at the beach after a storm, the sand is gone and the large cobblestone beach is fairly steep. Only the largest waves at the highest tide have an erosive impact. Westerly swells at 12-15' impact the cliff at a greater angle ~75° from normal carrying sand and debris to the east. Secondary erosion caused by wind, rain, runoff, etc. will continue after the primary erosion has undercut the base of the cliff until the slope reaches the angle of repose and becomes stable. Tidal currents don't have the erosive effect, but do carry suspended sediment to the east. Maximum flood current moves west to east at about 1.0 knot. On the maximum ebb, current flows south through Cattle Pass, beyond Salmon Bank, then to the west. A portion of the ebb current flows inshore to South Beach and east alongshore at 0.1 knot at the base of the cliff. Tidal currents are responsible for littoral drift of sediments to the east and a net loss to Salmon Bank. Perhaps the most cost effective way to maintain the roadbed and the cliff at Cattle Point is to use rock revetment to absorb the wave energy approaching the slope during storms. The rocks at the base of the cliff will blend with the existing rock outcrops and ultimately prevent a net loss of sand to Salmon Bank. This option is certainly worth considering. Wind, tide, and bathymetry data are available to use a numerical model to evaluate the wave energy and erosion potential at this site and to determine the size and amount of rock required to prevent further damage to the cliff."

Response: These ideas have been discussed in the development of alternatives as possible solutions. However, this project has two basic goals (which are stated in the purpose and need for the project): to maintain access and to protect park resources. Proposed alternatives that suggest armoring the toe of the slope or otherwise changing the shoreline erosion and deposition processes do not adequately protect park resources. National Park Service Management Policy 4.8.1.1, Shorelines and Barrier Islands, states the following: Natural shoreline processes (such as erosion, deposition, dune formation, overwash, inlet formation, and shoreline migration) will be allowed to continue without interference. Consequently, Alternative 1SS is being rejected as it does not meet the National Park Service Management Policy 4.8.1.1 and as NPS experience has shown that it is not likely to be a permanent solution while it is likely to move the problem elsewhere. Please refer to Section 4.2.2 of the Scoping Document for a more detailed discussion of Alternative 1SS. It's important to keep in mind that this is a National Park. Since official establishment of the National Park System in 1916, Congress has passed a number of laws to protect the natural and cultural resources contained in parks. In most cases, those protections are greater than found elsewhere. Your observations regarding the erosion are informative and appreciated. Cost effectiveness will be considered in selection of the preferred alternative, as will the many other factors required by the National Environmental Policy Act, other applicable laws, and National Park Service Management policies.

Comment Received: February 20, 2004

Comment: “As a new resident of Cattle Point Estates, I am writing to you both to express my views with regard to the vexed issue of the Cattle Point Road Relocation Project. I fully understand the various concerns and constraints - environmental, financial, and other - about this project. But I believe that the issue of public safety and social responsibility must be paramount. There is a sizable residential community in Cattle Point Estates and Cape San Juan. These people-tax-paying citizens and voters-are entirely dependent upon Cattle Point Road as our only link with essential services such as food, medical care, and emergency response. It is crucially important that the various governmental bodies involved in the Cattle Point Road project respect our existence and do their part to ensure our public health and safety. Basic human needs must outweigh all other concerns in this project. Even one death caused by lack of access to essential services would be a grievous tragedy and a betrayal of all that our nation stands for with regard to its citizens. Residents of Cattle Point must, like residents of other island neighborhoods, have equal access to emergency services, and this means a reliable and direct road to the town of Friday Harbor. We must have direct and efficient access to the Medical Center, to the ferry, to the airport, to the supermarkets. Emergency vehicles such as fire engines and medical vehicles must be able to reach our homes rapidly and safely.”

Response: The FHWA, NPS, DNR and County share your concerns about safety and access. The project team is working diligently to develop alternatives to provide for safe and efficient access through the Cattle Point Road Corridor while at same time providing the protection and preservation of one of our nation's National Historical Parks. If failure occurs prior to this, the agencies will deal with the loss of the roadway under emergency laws

Comment Received: February 26, 2004

Comment: “Bridge or tunnel acceptable, best solutions presented. Option 3 - minimally acceptable. Options 4 & 5 - NO! If the road can be made safe in its present location through tunnel or over bridge, my vote would go there. If option 1 & 2 are prohibitively expensive, #3 is the next best.”

Response: At this point in the NEPA process, the full range of alternatives that meet the purpose and need must be considered. Corridors 4 and 5 and Alternatives 1SS and 1BR within Corridor 1 have been considered but rejected due to the high level of impacts, incompatibility with park policy, and lack of public support. The corridors that are being recommended for advancement to the draft EIS are Corridors 2 and 3 both of which include a tunnel option. Any alternative chosen will address safety issues.

Comment Received: February 26, 2004

Comment: “I regret that I was unable to attend meetings in Friday Harbor on February 18th regarding the erosion which threatens continued use of the Cattle Point road, but will take this opportunity to comment based on what I have seen of the handouts distributed at those meetings. I am also including an earlier letter signed by a significant number of my neighbors here at Cape San Juan. There was no confirmation that this letter, mailed to the

then current Supervisor of the San Juan County Department of Public Works, was ever received. Mr. Huse left County employment shortly after this letter was mailed and there is no way of knowing if the comments it contained are included in body of "public comment". My neighbors and I have asked, and now ask again, that serious consideration be given to what is referred to in the handouts as Alternative 1SS (Slope Stabilization). Your material states only that "stabilization at the toe of the bluff where the wave action is eroding, is contrary to the National Park Service mandate not to change a natural process." We all know that mandates are not irrevocable when reasoned and logical alternatives exist. If it can be shown that stabilization at the bottom of the bluff will be the most permanent fix and likely the most cost effective of the alternatives outlined so far, it seems a far stretch to believe that responsible officials with the National Park Service would fail to recognize that fact and deny approval to proceed. The mandate against changing a natural process also seems a bit hollow in that park crews have in the past couple of years spent considerable time and money to thin out naturally regenerated tree saplings inside the park and within two miles of the road erosion problem. That's changing a natural process. Pulling up naturally occurring tree seedlings from the grassy slopes several years earlier is another example of changing a natural process. Anything that is done to change the present road as outlined in the other alternative locations will certainly do more to disrupt and modify the natural environment than a well designed rip rap at the water's edge. We strongly urge the agencies involved in deciding this matter to seriously revisit Alternative 1SS. We believe that "common sense" is the key phrase in this study. Lets make this a permanent solution to ensuring safe access for the 270 or more residents that live at the south end of the island. Please don't back down to a stated "mandate" when logic is so clear."

Response: Selection of the preferred alternative for dealing with this situation is not going to be simple. The National Environmental Policy Act (NEPA) was enacted by Congress to assure that everyone would have the opportunity to participate in the decision-making process and that the environmental concerns would be addressed. We urge the public to engage fully in the discussion and consider other points of view, rather than focusing on one alternative from the outset. To date, every alternative that has been presented has negative consequences to natural or cultural resources or to the human environment (as defined by NEPA). That includes the shoreline stabilization suggested in this comment. This project has two goals (which are stated in the purpose and need for the project): to maintain access and to protect park resources. Proposed alternatives that suggest armoring the toe of the slope or otherwise changing the shoreline erosion and deposition processes do not adequately protect park resources. Consequently, Alternative 1SS is being rejected as it does not meet the National Park Service Management Policy 4.8.1.1 and as NPS experience has shown that it is not likely to be a permanent solution while it is likely to move the problem elsewhere. Refer to Section 4.2.2 of the Scoping Document for a more detailed discussion of Alternative 1SS. The National Park Service has recognized that access is crucial to residents of Cattle Point. Those residents need to recognize that protection of park resources is just as crucial. A viable solution must accomplish both goals.

Comment Received: February 27, 2004

Comment: “Preference: Corridor 1. Anything other will significantly impact the most beautiful walk on SJ Island. I also frequently walk the beach. Some rip rap on the cliff would not bother me. This would also be the most economical fix.”

Response: Alternative 1NB (No Build) will be carried on for further evaluation. Any rip rap placed on the bluff will be undercut and fall with the eroding slope. An attempt to stabilize the slope would require erosion control at the toe of the slope as well. These methods have been discussed in the development of alternatives as possible solutions. However, this project has two basic goals (which are stated in the purpose and need for the project): to maintain access and to protect park resources. Proposed alternatives that suggest armoring the toe of the slope or otherwise changing the shoreline erosion and deposition processes do not adequately protect park resources. National Park Service Management Policy 4.8.1.1, Shorelines and Barrier Islands, states the following: Natural shoreline processes (such as erosion, deposition, dune formation, overwash, inlet formation, and shoreline migration) will be allowed to continue without interference. Furthermore, NPS experience has shown that stabilization at the toe of the slope is not likely to be a permanent solution while it is likely to move the problem elsewhere. Subsequently, Alternatives 1SS (slope stabilization) is being rejected and will not be carried forward into the draft EIS. Refer to Section 4.2.2 of the Scoping Document for a more detailed discussion of Alternative 1SS. Alternative 1BR (bridge) is also being rejected due to its long term visual impacts. In addition Corridors 4 and 5 are being rejected due to their relatively high impacts to biological and recreational resources and as a result of low public support

Comment Received: March 1, 2004

Summary Comment: Two letters were received, one was sent previously, in 2001. The commenter is a geo-morphologist and generally disagrees with the calculations used to anticipate the rate of erosion of the cliff. The commenter also proposed an additional corridor be considered between the 4th and 5th corridors.

Response: These comments raised some important points. The validity of studies done to date was discussed by WFLHD Geotechnical Branch and the USACE Seattle Office. The USACE agreed with the methodology used and did not recommend that any additional studies were warranted. They also agreed with the inaccuracies in the method used to determine an erosion rate from the aerial photos. They were unaware of any additional information available regarding erosion in the area. If requested, the USACE would utilize historic photos to estimate the erosion rate in a similar manner, possibly attempting to reduce the inaccuracies. It was determined that methods used to date were acceptable for this phase of the proposed project as long as a broader range of erosion rates (1'-3'/year) is used to reflect the uncertainty. Per your recommendation, further studies may be conducted based on needs identified in the development of alternatives.

Comment Received: March 2, 2004

Comment: “Please do not consider Corridor 5. The trails through the forest and over Mount Finlayson are beautiful and highly used by islanders and visitors alike. They should be left undisturbed. Corridors 3 & 4 are too close to the ridgeline. Corridor 2 may have the least impact on the existing environment, although the native prairie is rare and should be spared as much as possible.”

Response: At this point in the NEPA process, the full range of alternatives that meet the purpose and need must be considered. Corridors 4 and 5 have been considered but rejected due to the relatively high level of impacts (including those identified in this comment) and low public support. Corridors 2 and 3 and their associated alternatives as well as the ‘No Action Alternative’ will be advanced to the draft EIS. The NEPA process will guide identification and assessment of impacts associated with each alternative so that an alternative that best satisfies the purpose and need and minimizes impacts to the natural and human environment is selected. This will include assessing impacts to trail usage and the plant and animal species in the area.

Comment Received: March 2, 2004

Comment: “I would not like to see any money spent on temporary solutions to save Cattle Point Road. A road that does not have too many curves and hills would seem to be the safest solution. Many tourists and bicyclist tend to stop anywhere the minute they spot an eagle, whale or wild animal. More pullovers might alleviate this dangerous situation. Passing lanes, bicycle and pedestrian paths, and a 45 m.p.h. would please me.”

Response: Preserving access is a part of the purpose and need for the project. The design life of the alternatives will have to be balanced with impacts in selecting an alternative. Safety is a priority with all alternatives and will be addressed for each alternative. The amount of tourist and non-motorized travel on the roadway does raise safety concerns. These concerns will be taken into consideration when designing the selected alternative.

Comment Received: March 2, 2004

Comment: “Please do everything possible to save and protect the Mt. Finlayson trails. The lower trail through the trees and the upper trail along the ridge are the most used of all island trails by locals and are so unique because of the trees and views. Thanks.”

Response: Due to the relatively high level of impacts to biological and recreational resources associated with Corridors 4 and 5 and the low level of public support, these corridors are being rejected and will not be carried forward into the draft EIS. The NEPA process will guide identification and assessment of impacts associated with each alternative so that an alternative that best satisfies the purpose and need and minimizes impacts to the natural and human environment is selected. This will include assessing impacts to trail usage and the plant and animal species in the area, as well as balancing human and other environmental impacts.

Comment Received: March 4, 2004

Comment: “The footpaths over the top of Mt. Finlayson or through the woods on its north flank are treasures to be preserved at all cost. The hike on the ridgeline (Corridor 4) is one of the *best* accessible walks in the USA. With a vista from Mt. Rainier across all the Olympic Mtns to the southern mtns. of Vancouver Is., it is an unsurpassed collision of sea, sky and land. Please pursue Cattle Pt. Rd. re-location options at Corridors 1 or 2. Corridors 3, 4 & 5 are unacceptable - they would destroy this precious heritage. Other strong arguments disfavor Corridors 3, 4 or 5 when one considers the threat to flora and fauna around Mt. Finlayson. Thank you.”

Response: A full range of alternatives that meet the purpose and need must be considered during the NEPA scoping process. Due to the relatively high level of impacts to biological and recreational resources associated with Corridors 4 and 5 and the low level of public support, these corridors are being rejected and will not be carried forward into the draft EIS. Corridors 3 and 2 (including associated tunnel options) and the ‘No Action Alternative’ are being proposed for further analysis in the draft EIS. The NEPA process will guide identification and assessment of impacts associated with each alternative so that an alternative that best satisfies the purpose and need and minimizes impacts to the natural and human environment is selected. This will include assessing socioeconomic, cultural, and other Park and human impacts in addition to trail usage, plant and animal species in the area.

Comment Received: March 4, 2004

Comment: “I am writing to comment on the alternate proposals for realignment of Cattle Point Road in San Juan National Historical Park. I live in Cattle Point Estates, and my property directly abuts the DNR property which adjoins the Park. I previously submitted comments in connection with the original scoping document, but would like to comment on the new proposals. As a resident of the south end of the island I am, of course, concerned that this project proceeds expeditiously to insure that the road remains open to residents and visitors. Moreover, I was disappointed to learn that an emergency plan has not been developed in the event of a catastrophic failure in the road. However, I also am concerned that the project has the least possible impact to the very special and unusual habitats that American Camp and the DNR lands contain. I walk the trails through the DNR land and the Park on an almost daily basis. I have personally observed that this section of the Park is used for nesting by many threatened species of birds, including Bald Eagles and Pileated Woodpeckers; provides winter habitat for numerous species of migratory waterfowl; and contains rare native plants including several species of orchids. Accordingly, I am alarmed to see that two of the proposed realignments (Options 4 and 5) involve removal of trees and construction in the limited wooded habitat along the crest of Mt. Finlaysen or on its northern downslope. Both of these alternatives would result in serious damage to this very special area. As just one example, there is an active Bald Eagle nest in the firs that border the prairies at the crest of Mt. Finlaysen that would be destroyed by construction in the area. In addition to the direct damage from the construction process, there would be ongoing effects from road run-off, noise and air pollution that would impact the woods and lagoons

that slope down the north side of Mt. Finlaysen. This area, the only remaining large wooded habitat on the south end of the island, supports dozens of bird species as well as many plants and other species. I believe that it would be far preferable to pursue Options 1,2 or 3, which involve moving the road to a higher position on the south face of Mt. Finlaysen. In addition to resulting in less environmental damage, these options would result in a less winding and safer road. Thank you for the opportunity to submit these comments. I would appreciate being placed on your list of interested parties for purposes of receiving notice of any additional steps in the EIS process.”

Response: We are expediting the project as much as possible within the boundaries of the NEPA process to allow time to adequately evaluate all environmental issues and allow for involvement of affected parties in selecting a preferred alternative and mitigation. If failure occurs prior to this, the agencies will deal with the loss of the roadway under emergency laws. The road is monitored under the existing County maintenance program. A full range of alternatives that meet the purpose and need must be considered during the NEPA scoping process. Due to the relatively high level of impacts to biological and recreational resources associated with Corridors 4 and 5 and the low level of public support, these corridors are being rejected and will not be carried forward into the draft EIS. Corridors 3 and 2 (including associated tunnel options) and the ‘No Action Alternative’ are being proposed for further analysis in the draft EIS. The NEPA process will guide identification and assessment of impacts associated with each alternative so that an alternative that best satisfies the purpose and need and minimizes impacts to the natural and human environment is selected. If a build alternative is selected, the process will identify measures to minimize impacts during and after construction through mitigation measures such as erosion, noise, and air pollution control.

Comment Received: March 8, 2004

Comment: “in order of preference for least disturbance: option 1 bridge option 2 tunnel option 2. 3, 4, and 5 are unquestionably greater disturbances than are necessary to accomplish the need. Applicable regulations: SJCC 18.60.080, .090, and .110. If within the shoreline, SJCC 18.50.050-150 and 340.”

Response: A full range of alternatives that meet the purpose and need must be considered during the NEPA scoping process. This project has two basic goals (which are stated in the purpose and need for the project): to maintain access and to protect park resources. Due to the relatively high level of impacts to biological and recreational resources associated with Corridors 4 and 5 and the low level of public support, these corridors are being rejected and will not be carried forward into the draft EIS. Proposed alternatives that suggest armoring the toe of the slope or otherwise changing the shoreline erosion and deposition processes do not adequately protect park resources. Consequently, Alternative 1SS (slope stabilization) is being rejected as it does not meet the National Park Service Management Policy 4.8.1.1 and as NPS experience has shown that it is not likely to be a permanent solution while it is likely to move the problem elsewhere. In addition, Alternative 1BR (bridge) is being rejected due to its long term visual impacts. Corridors 3 and 2 (including associated tunnel options) and the ‘No Action Alternative’ are being proposed for further analysis in the draft EIS. The

NEPA process will guide identification and assessment of impacts associated with each alternative so that an alternative that best satisfies the purpose and need and minimizes impacts to the natural and human environment is selected. The project team includes representatives from the NPS, the County, FHWA, and DNR. All applicable regulations are being considered and complied with.

Comment Received: March 11, 2004

Comment: “As one who sent in a comment on the Cattle Point Road choices, preferring alternative 1 which leaves the road where it is, I have a suggestion which would allow for one of the other alternatives and still please me. Extend the trail system under the new section(s) of road out to the bluff. I would assume this would be relatively inexpensive to do if it was part of the design plan. This would establish a 'give back' to the intrusion a new road section will impact on the best, long walking trail on the island, possibly making it better and longer. Ideally I'd like to see two walk under portals connecting a bluff trail to the older trails. Something like this might win over much more local support for the project.”

Response: We appreciate your suggestion and valuable input. This idea will be carried forward as a possible means to minimize and mitigate impacts to the trail system associated with some of the alternatives.

Comment Received: March 12, 2004

Comment: “I support the tunnel option. While I suspect there are cost concerns, it seems that it will to be the least visual impact. Moving the road up the hill will impact the hikers on the trail that goes along the top of the hill. I strongly support alternative 2TU. Those traveling in cars will still be able to see the view from the road before they enter the tunnel as it is the same view. There should be less cars visible for boaters providing a more pristine view from the straights.”

Response: We appreciate your suggestion and valuable input. Alternative 2TU is being carried forward for further studies and evaluation as a viable alternative to meet the purpose and need. We will assess the visual impacts of all alternatives that are carried into the draft EIS.

Comment Received: March 19, 2004

Comment: A map was also attached with this letter and is available upon request. “As members of the San Juan Island Trails Committee we are very concerned about the Realignment Project for Cattle Point Road. As you are aware, this affects an area of exceptional scenic, natural and recreational resources, now endangered to various degrees by the 5(+) alternative solutions for the road realignment. We are particularly concerned about the trails in the vicinity of Jakle's Lagoon and Mt. Finlayson. The trails traverse a marine shoreline habitat, as well as a deeply-shaded old growth forest, only to open out into a

natural high prairie. This third setting provides the visitor with expansive and breathtaking views of Cattle Point, the Strait and surrounding islands, the mainland, the Olympic Range, Mt. Baker and Vancouver Island. The trails host large numbers of visitors, residents and tourists alike, and it is no wonder. To have three such different habitats in such close proximity to each other is a rarity; combined with such natural and scenic beauty, it is really a treasure. The attached map shows the 5 options overlaid on our trails map of this area. Since the eroding slope that's causing the problem seems to have a general angle of repose of 30 degrees, we assume the hillside above the road would be much the same. Thus alternative corridors 1 thru 3 could result in high exposed cut slopes, and potentially long exposed fill slopes. This will create contrasting color and shape on the slope seriously detracting the viewers eye from the grass colors and form of Mt. Finlayson; -a negative visual experience as seen from the Redoubt, Self-guided Nature Trail and views from tour boats offshore. Alternatives 2 and 3, due to the length of the cut slope could seriously impinge upon the trail along the crest of Mt. Finlayson, perhaps even to the extent of making unsafe to walk. Noise from these 3 alternatives will be much more noticeable to users of the Mt. Finlayson trail. Alternative corridor 4, will eliminate, for all practical purposes, use of the Mt. Finlayson trail, in addition to creating large cut and fill slopes on both the east and west ends of the mountain. Alternative corridor 5 will damage and perhaps eliminate the parking for Jakle's lagoon. It will also take out the forested portion of the Jakle's Lagoon-Mt. Finlayson loop trail; eliminating a key element to that trail. As these trails are shown on the San Juan Island National Historical Park brochure, they are existing recreational facilities. Per the Highway Act such facilities must be protected and/or effects mitigated. If neither is possible the effected facilities are to be replaced in kind. We seriously doubt if replacement in kind is possible within either American Camp or English Camp boundaries as they presently exist. So, in consideration of the possible alternative corridors proposed to realign Cattle Point Road, we cannot stress too strongly the need to minimize impact on this area. Not only would the destruction of this resource be devastating, but we cannot see any acceptable or adequate provision possible for replacing the loss of this recreational site, as would be required. This project needs to be carefully thought out so that adverse effects upon the visually significant and historical landscapes as seen from American camp are protected or mitigated to not be adversely affected by road scars. In addition, the unique qualities now found along the Jakle's Lagoon-Mt. Finlayson trail network must be protected. The same amount of thought needs to be expended upon working out probable responses to catastrophic failures of the hillside before planned construction can be completed. This possible occurrence can and should be analyzed on a parallel path with the current EIS work. We hope that you will give significant considerations to our concerns, and thank you for your attention. Very truly yours, San Juan Island Trails Committee”

Response: A full range of alternatives that meet the purpose and need must be considered during the NEPA scoping process. This project has two basic goals (which are stated in the purpose and need for the project): to maintain access and to protect park resources. Due to the relatively high level of impacts to biological and recreational resources associated with Corridors 4 and 5 and the low level of public support, these corridors are being rejected and will not be carried forward into the draft EIS. Proposed alternatives that suggest armoring the toe of the slope or otherwise changing the shoreline erosion and deposition processes do not adequately protect park resources. Consequently, Alternative 1SS is being rejected as it does not meet the National Park Service Management Policy 4.8.1.1 and as NPS experience

has shown that it is not likely to be a permanent solution while it is likely to move the problem elsewhere. In addition, alternative 1BR (bridge) is being rejected due to its long term visual impacts. Corridors 3 and 2 (including associated tunnel options) and the 'No Action Alternative' are being proposed for further analysis in the draft EIS. The NEPA process will guide identification and assessment of impacts associated with each alternative so that an alternative that best satisfies the purpose and need and minimizes impacts to the natural and human environment is selected. This will include assessing impacts to trail usage, aesthetics, natural habitat, and the plant and animal species in the area. Regarding protecting existing recreational facilities, it is assumed that the commenter is referring to Section 4(f) of the Department of Transportation (DOT) Act of 1966, although that Act does not require replacement in kind, but rather seeks avoidance of use of park land where possible. That Act, however does not apply to park roads. The proposed road project will be the construction of a National Park Service Road. Therefore, Section 4(f) does not apply. We are committed to preserving the values and recreational opportunities in the Park and will avoid, minimize and mitigate for any impacts to recreation that the preferred alternative may have. Although an emergency situation would be dealt with appropriately, it is the intent of this effort to more thoroughly address potential issues in finding a solution to the problem. Therefore, we are attempting to expedite the process yet still provide necessary time for studies and public involvement.

Comment Received: March 19, 2004

Comment: "I am a 25-year San Juan Island resident and frequently walk the Mt. Finlayson loop. Every year I see more people engaged in this activity. That area is not just a walk in the woods or around a field. Many highly valued resources lie along and away from the paths. These need to be conserved as only national park can do. Everyone knows and values the three lagoons with their unusual presence of spruce and yew trees. Waterfowl, eagles and herons are ever present along that wooded shore. Within that forest the ice ages have left us with what appears to be at least two kettle formations. In contrast to the north facing dense forest which provided cover for deer and fox, the south facing sloping meadow is both a natural and cultural resource, established and maintained by desiccation, salty wind, native burning and finally by grazing. This creates perfect conditions for liliaceous forbs like *Camassia*, *Fritillaria* and *Brodiea* that we love to admire. The ridge top is especially well endowed with wild flower and, ohh my, those ancient gnarled Douglas fir wolf trees, branched to the ground, fire-scarred innumerable times, wind pruned into shapes no human could devise and daily hosting eagles and hawks. Nightly the owls hunt from the same trees. Oh, the stories those ancient trees hold for us, like unopened library books. Perhaps the most valuable resource is the world-class textbook-perfect example of wave-cut benches and flat summits clearly displaying the sea levels since the last glacial retreat. The absence of forest, rock outcrop and human disturbance, makes this geologic/historic feature particularly valuable and should be restored rather than further disturbed. From Olympia north history begins with the ice retreat and we have the finest example on Mt. Finlayson's south meadow with the added good fortune of national park protection. Bald Mt. on the north shore of Griffin Bay once had similar benches, flora and fauna. A gravel export business reduced Bald Mt. to a nearly sea-level industrial brown field¹. Is the death of Mt. Finlayson by a thousand little cuts any better? Clearly the broad meadow spreading out east from the

visitors' center and extending to Cattle Point is chock full of national and historic resources and the most used part of the park. It does not need another roadway but rather the greater public would be better served by less or no through traffic in that area, except park traffic. Of the eight alternatives presented all share the same flaw: assuming roads are the only resolution. Like eight really bad candidates in an election, if I have to pick the least damaging it will be the riprap beach even though I'm a marine biologist and walk the beach frequently. That said, let's remember that ferries are an integral part of a highway system, especially in the Northwest. Ever more pavement is not the only means of transportation. The needs of Cape San Juan can be adequately served by establishing a small ferry. The have an excellent harbor at Fish Creek and the other landing could be established in several places like Jensen Bay Road end, the seldom used state park corridor on Griffin Bay or best of all, and the most sheltered, the boggy, brushy unused part of the National Park by the horse trailer parking. Cattle Point Road comes closest to the water at this point and a small road already has been established nearly to the water. The existing easement along the highly valuable Mt. Finlayson property could be traded for a piece of the bog and shore that gets no use and may never. The Cape San Juan property owners (many are non-residents and that ratio is shifting to most) will howl in protest at any change because nobody likes imposed changes. Yes, they will say their property values will fall and they will be inconvenienced. Currently they have their own fire protection and an excellent water system. Well Ok I'd like to buy them out at today's prices and re-sell in a few years when Cape San Juan with its little ferry has become to San Juan Island what Chappaquiddick Island is to Martha's Vinyard. - and it will. There is nothing like exclusivity to increase property values, even if the property is sinking into the sea like ferry served Balboa Is. in newport Bay California Set up a ferry and give the National Park back to the people of the Nation; not a no-cost through route for the absentee landlords of Cape San Juan”

Response: A full range of alternatives that meet the purpose and need must be considered during the NEPA scoping process. This project has two basic goals (which are stated in the purpose and need for the project): to maintain access and to protect park resources. Due to the relatively high level of impacts to biological and recreational resources associated with Corridors 4 and 5 and the low level of public support, these corridors are being rejected and will not be carried forward into the draft EIS. Proposed alternatives that suggest armoring the toe of the slope or otherwise changing the shoreline erosion and deposition processes do not adequately protect park resources. Consequently, Alternative 1SS is being rejected as it does not meet the National Park Service Management Policy 4.8.1.1 and as NPS experience has shown that it is not likely to be a permanent solution while it is likely to move the problem elsewhere. Refer to Section 4.2.2 of the Scoping Document for a more detailed discussion of Alternative 1SS. In addition, alternative 1BR (bridge) is being rejected due to its long term visual impacts. Corridors 3 and 2 (including associated tunnel options) and the 'No Action Alternative' are being proposed for further analysis in the draft EIS. The NEPA process will guide identification and assessment of impacts associated with each alternative so that an alternative that best satisfies the purpose and need and minimizes impacts to the natural and human environment is selected. This will include assessing impacts to trail usage and the plant and animal species in the area. Your suggestion of replacing the road with a ferry system was discussed but it was determined that this method of transportation would not meet part of the purpose and need for the project as it would compromise the access of Cattle Point residents to emergency services particularly during poor weather conditions.

Creating or modifying ferry terminals would also result in impacts to marine resources as would the regular operation of a ferry system.

Comment Received: March 19, 2004

Comment: "There is no really good solution to the problem of the eroding Cattle Point Road. Instead let's look at what needs to be protected. Most residents of San Juan Island will tell you that this park is very special and their favorite place to walk and visit. The section of road in question traverses the south slope of Mt. Finlayson. Above the road grassy meadows slope up to the ridge where the terrain abruptly shifts to the moist forest of the north-slope. The grassy south - slopes are loved for their sweeping dramatic views of the Strait of Juan de Fuca. The northern forest has lovely trails and harbors three beautiful lagoons. Presently it is unmarred by any motorized transit. The edge zone where the forest and grasslands meet along the top of Mt. Finlayson is particularly in need of protection. The deer and foxes which hunt and forage on the grasslands need unimpeded access to the forest for shelter. Eagles, hawks and owls use the great gnarled Douglas firs that grow here for lookouts and nests. The grassy slopes of Mt. Finlayson illustrate to perfection the geological history of this seacoast. As the ice age retreated the land rose and the sea level kept changing. The wave-cut benches of Mt. Finlayson represent a series of shorelines as this happened. To raise the road above its present position would destroy the natural form of these ancient benches. My proposed solutions in order of preference are: 1. Remove the road and replace it with a ferry from the horse trailer parking area (which isn't used) to Fish Creek on Cape San Juan. Remember in the Northwest ferries are part of the highway system. Buyout those homeowners who don't want to stay and use the ferry. Later when the ferry has been established and the exclusivity of a very insular peninsula has become attractive sell the homes and recoup the cost of the buyout. If homes on Henry Is. and Brown Is., both close to San Juan Island, are costly and desirable who not Cape San Juan? This is probably no more costly than rerouting the road and maybe even less costly. This way the integrity of the park is protected. 2. Riprap the beach, horrible as that is, I'd prefer it and the changes that would result in the beach to further damaging beautiful Mt. Finlayson. 3. If there must be a road alter the present route as little as possible. By the time that erodes we may no longer have fossil fuels or drive cars. Worse, if a road must go on the north side keep it above the existing trails but well below the grass-forest edge zone."

Response: A full range of alternatives that meet the purpose and need must be considered during the NEPA scoping process. Due to the relatively high level of impacts to biological and recreational resources associated with Corridors 4 and 5 and the low level of public support, these corridors are being rejected and will not be carried forward into the draft EIS. Proposed alternatives that suggest armoring the toe of the slope or otherwise changing the shoreline erosion and deposition processes do not adequately protect park resources. Consequently, Alternative 1SS is being rejected as it does not meet the National Park Service Management Policy 4.8.1.1 and as NPS experience has shown that it is not likely to be a permanent solution while it is likely to move the problem elsewhere. Refer to Section 4.2.2 of the Scoping Document for a more detailed discussion of Alternative 1SS. In addition, Alternative 1BR (bridge) is being rejected due to its long term visual impacts. Corridors 3 and 2 (including associated tunnel options) and the 'No Action Alternative' are being

proposed for further analysis in the draft EIS. The NEPA process will guide identification and assessment of impacts associated with each alternative so that an alternative that best satisfies the purpose and need and minimizes impacts to the natural and human environment is selected. This will include assessing impacts to trail usage and the plant and animal species in the area. Your suggestion of replacing the road with a ferry system was discussed but it was determined that this method of transportation would not meet part of the purpose and need for the project as it would compromise the access of Cattle Point residents to emergency services particularly during poor weather conditions. Creating or modifying ferry terminals would also result in impacts to marine resources as would the regular operation of a ferry system.

Comment Received: March 22, 2004

Comment: “Analysis of Cattle Point Road Relocation Options” Option 3 is a clear choice as the most effective, lowest impact solution to the requirement to reposition Cattle Point Road. The key observations leading to this conclusion follow. Option 5 would have a major, completely unacceptable impact on the Park. The upper and north reaches of Mount Finlayson are a very special place for the animal and plant life living thereon and for neighbors, for island residents and for visitors who hike through it. Bisecting this space with a road would destroy the most beautiful, pristine area on the island. There is also the risk of impact to the Mount Finlayson aquifer. The negative ecological and social impacts of Option 5 far outweigh any cost or other rationales for selecting Option 5. This option, as compared to any of the others, would be a disaster. The repositioning of Cattle Point Road is a major undertaking. The longevity of the selected solution and the return on investment are very important. A 100 year solution is much more desirable than a 50 year solution. This is sufficient to eliminate Option 1 and Option 2 from further consideration. Should Option 3 or Option 4 be implemented, the view of the Park from Haro Strait would be very similar to the current situation; there is a road along the hillside. The current roadway will doubtless be recontoured into the hillside. This relocation up the hill is a neutral impact. The area north and east of Mount Finlayson and down onto Cattle Point Estates and Cape San Juan is a single, continuous territory that the animals and birds move through freely both day and night. It is very important to preserve this contiguous space for their use. Option 4 puts the road very close to the woods. This would visually disturb the woods edge as seen from below. It would introduce noise and movement impacts on the woods, changing the environment for the animals, birds etc. Option 4 would make it very difficult for hikers to be at the high points (along the woods edge) while having uninterrupted vistas across Haro Strait. These impacts make Option 4 considerably less attractive than Option 3. Hence, Option 3 is our strong recommendation and preference for the relocation of Cattle Point Road. Following are a few additional comments. Do not connect the eastern end of the new road section back to Cattle Point Road at a point beyond the DNR road. Terminate the new road section between the roadside pull off and the lighthouse. Putting the eastern end of the new road section beyond this point would have a major, very negative impact on the daylight movement paths of the deer who regularly traverse between Cattle Point Estates, Cape San Juan and the Park. It would dramatically change, indeed potentially destroy, the tranquility of the residential environment beyond the lighthouse by putting traffic into an area now marked No Outlet and by inviting people to wander through the area. The use of a tunnel

would reduce the visual impact of the road when observed from Haro Strait. However, this is going to significantly increase the cost. A neutral impact solution, as discussed above, is sufficient. Thank you for considering our input in the planning process. We will be glad to participate in any further exchanges that would be useful.”

Response: Thank you for your input, it is appreciated and will be taken into consideration in developing the alternatives. A full range of alternatives that meet the purpose and need must be considered during the NEPA scoping process. Due to the relatively high level of impacts to biological and recreational resources associated with Corridors 4 and 5 and the low level of public support, these corridors are being rejected and will not be carried forward into the draft EIS. Proposed alternatives that suggest armoring the toe of the slope or otherwise changing the shoreline erosion and deposition processes do not adequately protect park resources. Consequently, Alternative 1SS is being rejected as it does not meet the National Park Service Management Policy 4.8.1.1 and as NPS experience has shown that it is not likely to be a permanent solution while it is likely to move the problem elsewhere. In addition, alternative 1BR (bridge) is being rejected due to its long term visual impacts. Corridors 3 and 2 (including associated tunnel options) and the ‘No Action Alternative’ are being proposed for further analysis in the draft EIS. Your comments regarding the eastern terminus of the project will be considered as the alternatives are taken from corridors to more defined locations in the DEIS. The NEPA process will guide identification and assessment of impacts associated with each alternative so that an alternative that best satisfies the purpose and need and minimizes impacts to the natural and human environment is selected. This includes balancing proposed design life with impacts of each alternative, including economic impacts.

Comment Received: March 22, 2004

Comment: “I am very concerned that changes to Cattle Point Road will disrupt the beautiful hiking trail and wildlife habitat on Mt. Finlayson. I encourage the Park Service to advocate strongly for a road solution which will not impact the woodland and/or hilltop trail. I understand that there is a possible solution which would involve a cut and cover tunnel which would still afford views to drivers but protect the view and integrity of the trails and the wildlife habitat. Please choose a road solution which will not destroy this beautiful bit of open space. Thank you.”

Response: A full range of alternatives that meet the purpose and need must be considered during the NEPA scoping process. Due to the relatively high level of impacts to biological and recreational resources associated with Corridors 4 and 5 and the low level of public support, these corridors are being rejected and will not be carried forward into the draft EIS. Corridors 3 and 2 (including associated tunnel options) and the ‘No Action Alternative’ are being proposed for further analysis in the draft EIS. Further analysis of these alternatives will assess how well each of them meets the purpose and need of the project including the protection of natural, cultural, and recreational resources.

Comment Received: March 22, 2004

Comment: “In realigning this road, I respectfully urge you to maintain as much of the natural environment as possible, and please don't destroy our wonderful hiking trails over Mt. Finlayson and through the woods. It seems unwise to me to try to guess what the needs in the area will be 100 years from now. So much could (and certainly will) change. Please move the road as minimally as you can consistent with escaping the erosion for a more prudent period of time. But please move the process along as expeditiously as possible, so that we aren't faced with an emergency situation where nothing matters except access for the residents living east of the park. I'm afraid if that happens, there will no longer be any consideration given to the environment and the trails.”

Response: The NEPA process guides the identification and assessment of impacts associated with each alternative so that an alternative that best satisfies the purpose and need which includes the protection of natural, cultural and recreational resources is selected. The challenge with this, as you have recognized, is to balance impacts with expected life of the roadway. Due to the relatively high level of impacts to biological and recreational resources associated with Corridors 4 and 5 and the low level of public support, these corridors are being rejected and will not be carried forward into the draft EIS. Although an emergency situation would be dealt with appropriately, it is the intent of this effort to more thoroughly address potential issues in finding a solution to the problem. Therefore, we are attempting to expedite the process as much as possible while allowing the necessary time for studies and public involvement.

Comment Received: March 25, 2004

Comment Summary: The comment received is a 30 page document including 13 photos, several tables and figures. The Cattle Point Estate Owners Association (CPEOA) is concerned about the amount of time that has passed since the identification of the problem and the progress that has been made since that time, as well as the amount of time that will pass before an acceptable solution is in place. CPEOA wants an environmentally sensitive solution that retains the beauty and character of the park. They do not have a consensus recommendation on a preferred choice among the corridors presented. They want to see all the alternatives reviewed in the EIS and a choice made through a well structured decision process. CPEOA want to see the bluff armoring alternative addressed in the EIS to put to rest questions that keep coming up in conversation; they state that it 'is apparently not being considered in the current "Five Corridors" approach'. The CPEOA Board of Directors created a framework to identify decision constraints, which has been previously provided to the County and the Park. They identified their priorities and tradeoffs within each area and charted the potential dependencies and conflicts. CPEOA strongly request the project to define a decision framework for the project and make that framework publicly available before the EIS is complete. A cross section of the bluff is included in the document, showing the surface angles for the top of the bluff and face of the bluff at twenty and thirty-four degrees respectively. Several photos (10) are included, depicting the erosion of the bluff from a variety of angles, and on several dates. Lindsey Bauman's recession study, methods, and results of the recession measurements at the top of the bluff are summarized. The letter also states that data will continue to be collected and reported to the Park. A photo of the

stake placement as well as three figures depicting the recession measurements are included. A discussion regarding the intercept of angle of repose concludes that measuring the distance from the guardrail to the intercept of the angle of repose may be a more meaningful measurement than the measurement of the guardrail to the edge of the bluff as there is an 8.5 foot difference between the numbers. Two graphs are given depicting this explanation. CPEOA is concerned that there is no emergency plan for failure of the road, and the length of time it would take for emergency repairs to occur. They want to know what triggers emergency action, who makes decisions about road safety and who is liable if someone is injured or dies because of road failure. CPEOA would like to see emergency trigger criteria identified and publicized immediately. They also believe the public deserves to know Park and County assumptions and expectations of flow time for an emergency repair when they exclude emergency planning from the project. CPEOA believes the solutions to the erosion on Park land should also consider erosion on the adjacent DNR land. They believe that if it is allowed to continue unchecked it will significantly impact critical areas of the Park. Two photos depicting the erosion are included. CPEOA notes some cracks that they think should be investigated by a geologist as they may indicate potential slumps. Appendix A consists of two tables depicting the decision framework of CPEOA. Appendix B consists of the prior letter of submittal, which reiterates the residents dependency on the road, concern that social and economic impacts were not listed as factors to be analyzed in the EIS, concern that a previous document that was produced did not involve any input from the community, and how the county would provide access for the residents under the No Action alternative. Appendix C consists of the data table for the recession measurements made by the Bauman study.

Response: The NEPA EIS process is comprehensive and time consuming in looking at all impacts with each alternative. Recognizing the nature of the erosion and the undesired possibility of this becoming an emergency situation, we are attempting to expedite the process yet still provide necessary time for appropriate studies and public involvement. As recommended, the NEPA process will guide identification and assessment of impacts associated with each alternative so that an alternative that best satisfies the purpose and need and minimizes impacts to the natural and human environment is selected. However, this project has two basic goals (which are stated in the purpose and need for the project): to maintain access and to protect park resources. Proposed alternatives that suggest armoring the toe of the slope or otherwise changing the natural shoreline erosion processes do not adequately protect park resources. Consequently, Alternative 1SS (slope stabilization) is being rejected as it does not meet the National Park Service Management Policy 4.8.1.1 and as NPS experience has shown that it is not likely to be a permanent solution while it is likely to move the problem elsewhere. Refer to Section 4.2.2 of the Scoping Document for a more detailed discussion of Alternative 1SS. The information from the Bauman study contained in this comment and possible inaccuracies were considered and utilized in developing the erosion rate range of 1-3' per year. If failure occurs prior to this, the agencies will deal with the loss of the roadway under emergency laws. The road is monitored under the existing County maintenance program. The DNR is included as a cooperating agency in this process to ensure any concerns with the adjacent DNR land will be considered. Your concerns about the erosion on the DNR land are a valid point. As a result, the threat to that area is being assessed and if it is decided to be a risk, will be considered in further development of alternatives in the DEIS. Social and economic concerns will be considered in this effort.

in this effort. Mandatory public review and input periods are a part of the NEPA process and will be included in this effort, as well as active involvement efforts. In this process, systems that involve similar methods of evaluating alternatives as the proposed framework will be utilized. The No Action alternative would rely on emergency repair to provide access.