

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

RECORD OF DECISION

GENERAL MANAGEMENT PLAN / WILDERNESS STUDY
ENVIRONMENTAL IMPACT STATEMENT

Channel Islands National Park

California

The Department of the Interior, National Park Service, has prepared this Record of Decision on the *General Management Plan/Wilderness Study/Final Environmental Statement* (GMP/WS/EIS) for Channel Islands National Park. This Record of Decision includes a description of the background of the project, a statement of the decision made, synopses of other alternatives considered, the basis for the decision, a description of the environmentally preferable alternative, a listing of measures to minimize environmental harm, and an overview of public and agency involvement in the decision-making process. Also attached are the park manager's non-impairment determination, an Errata documenting minor corrections to the Final EIS text (appendix A), and the Statement of Findings for Executive Order 11988, "Floodplain Management" (appendix B).

BACKGROUND OF THE PROJECT — PURPOSE AND NEED

For a park that includes five remote islands spanning approximately 125,000 acres of land and 125,000 acres of marine waters, the general management plan (GMP) defines a clear direction for resource preservation and visitor experience over the next 20 to 40 years. The GMP provides a framework for proactive decision making, which allows managers to effectively address future opportunities and problems, such as resource, operational, administrative, and visitor use issues facing the park. The GMP serves as the basis for future detailed management documents, such as five-year strategic plans and implementation plans. In addition, the wilderness study component determines if eligible portions of the park should be proposed for wilderness designation.

The last general management plan for Channel Islands National Park was completed in 1980, with amendments in 1984 and 1985. Conditions have substantially changed since 1985: the National Park Service has acquired new lands on Santa Rosa and Santa Cruz Islands, the condition of several resources has declined, significant programs to eliminate nonnative animals have occurred, several actions are underway to restore altered ecosystems, park visitation has tripled, recreational uses and use patterns have changed, marine protected areas have been established, and the use and occupancy right on Santa Rosa Island has expired (and the one on Santa Cruz Island is approaching expiration).

Channel Islands National Park also had not been studied for possible wilderness designation. The park's 1980 enabling legislation, the Wilderness Act, and NPS management policies require that the park's lands be evaluated for their eligibility for inclusion within the national wilderness preservation system.

DECISION (SELECTED ACTION)

The National Park Service has selected the preferred alternative (alternative 3) as described in the April 2015 *Final General Management Plan / Wilderness Study / Environmental Impact Statement* to implement. Alternative 3 emphasizes resource stewardship and resource preservation; while also placing more attention on expanding education and recreational opportunities and accommodations to provide diverse visitor experiences on the islands. Alternative 3 also proposes 1,298 acres of the park be designated as wilderness, on Anacapa, Santa Barbara, Santa Rosa and Santa Cruz Islands and on assorted rocks and islets, and 65,278 acres be designated as potential wilderness on Santa Rosa and Santa Cruz Islands. The selected action includes the following primary components that will be implemented as staffing and funding allow:

All Islands

- Biosecurity protocols will be implemented to prevent the introduction of nonnative species to the park.
- Park staff will develop and monitor key user capacity indicators and standards.
- Park managers will work with the Channel Islands National Marine Sanctuary, the National Marine Fisheries Service, and the State of California to evaluate the impact of anchoring by private boaters and determine if environmentally sensitive mooring devices should be employed in the park.

Anacapa Island

- One new employee housing unit will be constructed.
- 620 acres will be proposed as designated wilderness.

Santa Cruz Island

- Sediment in the flood channel in Scorpion Valley on Santa Cruz Island will be periodically excavated.
- Kayaking and snorkeling at Scorpion Valley will be managed through a concessioner.
- The existing Scorpion campground will be reconfigured to accommodate groups.
- An education/volunteers camp will be established if possible at Prisoners Harbor on Santa Cruz Island.
- Small primitive campgrounds will be established near Smugglers Cove and Prisoners Harbor on Santa Cruz Island.
- 14,476 acres will be proposed as potential wilderness.

Santa Rosa Island

- Ground transportation for visitors will be provided to three destinations on Santa Rosa Island — Johnsons Lee, Torrey Pines, and Lobo Canyon — via a concessioner.
- A concessioner will provide a rustic, economy accommodation for visitor lodging and a food service at Bechers Bay on Santa Rosa Island.
- The Water Canyon campground on Santa Rosa Island will be reduced, while a new campground will be provided at Bechers Bay.
- A primitive campground and ranger station will be provided at Johnsons Lee on Santa Rosa Island.
- A field station supporting research, education, and volunteers will be established at Bechers Bay.
- 50,802 acres will be proposed as potential wilderness.

San Miguel Island

- Guided multiday trips will be established to see pinnipeds at Point Bennett on San Miguel Island.
- A commercial operator will provide limited fixed-winged air access to San Miguel Island on a trial basis.

Santa Barbara Island

- 639 acres will be proposed as designated wilderness.

Islets and Rocks

- 39 acres will be proposed as designated wilderness.

Mainland location

- The mainland visitor center will be expanded and some administrative and maintenance operations will be relocated in Ventura Harbor.

Implementation of the Plan and Wilderness Study Proposal

The general management plan provides a framework to direct more detailed implementation planning and management for the park over the next 20 to 40 years. Prior to implementation of specific actions in the plan, additional detailed studies, planning and compliance, with public involvement, as appropriate would be conducted. The scope and detail of the actions described and the impact analysis conducted for the general management plan are consistent with the conceptual nature of this long-term programmatic planning document. The approval of this plan does not guarantee that the funding and staffing needed to implement the plan will be forthcoming. Full implementation of the plan could be many years in the future.

With regard to the wilderness proposal, if the NPS director concurs with this proposal, it will be sent to the assistant secretary of Fish and Wildlife and Parks, and the secretary of the interior, who may revise or approve the proposal. The secretary may then forward a wilderness recommendation to the president. The president may approve or revise the recommendation and then transmit his recommendation to Congress for consideration. Congress may enact legislation needed to include the area within the national wilderness preservation system as "designated" and/or "potential" wilderness. Areas proposed as potential wilderness would become designated wilderness upon the secretary of the interior's determination in the *Federal Register* that the nonconforming uses have ceased or terminated and mitigated if necessary.

OTHER ALTERNATIVES CONSIDERED

The *Final General Management Plan / Wilderness Study / Environmental Impact Statement* describes one other alternative and a no-action alternative, each of which are summarized below.

Alternative 1 (No-Action Alternative)

The no-action alternative, alternative 1, is required by the National Environmental Policy Act and provides the baseline from which to compare other alternatives. Under this alternative, there would be no major change in the management direction of the islands. All facilities, resource programs, and

visitor opportunities would continue as they are. None of the park would be proposed for wilderness designation.

Alternative 2

Alternative 2 emphasizes ecosystem preservation, restoration, and preservation of large expanses in relatively pristine resource conditions. Resource stewardship including ecosystem preservation and restoration, and preservation of natural landscapes, cultural landscapes, archeological resources, and historic structures would continue to be emphasized. Increased recreational opportunities would be provided for visitors to enjoy and appreciate the park.

Under alternative 2, 66,576 acres of the park would be proposed for wilderness designation, primarily on Santa Rosa and Santa Cruz Islands.

Minimal new development would occur on the islands; however, limited new facilities might be built on the islands for specific resource protection, research, management, or visitor services. There would be few changes in the transportation methods used to reach the islands or travel on the islands. Marine areas and resources would continue to be managed to protect ecosystems and biological diversity.

Partnerships would be expanded with governmental agencies, educational institutions, and others to bring the island experience to the public and facilitate educational opportunities, resource stewardship, and research.

Commercial services that use sustainable practices and were more ecologically sensitive in their operations would be encouraged.

BASIS FOR DECISION

After careful consideration of each alternative and its foreseeable environmental impacts, the expressed purpose and need for federal action, and all public and agency comments, including comments on the general management plan/wilderness study/draft EIS, Alternative 3 has been selected for implementation. This alternative best complies with NPS management policies, and best meets the management objectives to preserve Channel Islands National Park's natural and cultural resources while also providing increased opportunities for public use and enjoyment of the park.

The National Park Service has determined that the selected action will:

- continue to provide for the long-term protection and preservation of the park's natural and cultural resources.
- continue to emphasize the restoration of terrestrial ecosystems on the islands, including the removal of no longer needed roads on Santa Cruz and Santa Rosa Islands.
- expand recreational opportunities on several of the islands by providing new visitor facilities and limited commercial services, while minimizing impacts on park resources as much as possible.
- increase opportunities for the public to access San Miguel Island via fixed-wing aircraft on a trial basis, and to access portions of Santa Rosa Island via ground transportation.

- provide new needed visitor services and limited facilities to meet visitor needs on the islands.
- provide new opportunities for education and research in the park.
- provide additional facilities for park operations, which will improve the park staff's efficiency and effectiveness in managing the islands.
- limit additional facilities within the current development footprint.
- make park operations on the islands more sustainable.
- address expected climate change effects on park resources and facilities.
- protect wilderness character of the park through proposed wilderness designation, while also enabling ecosystem restoration activities to continue as temporary, nonconforming uses on east Santa Cruz and Santa Rosa Islands through proposed potential wilderness designation.

As documented in the final EIS, the following key factors support implementation of the selected action:

- The selected action has a high likelihood of achieving the expressed purpose and goals as articulated in the draft and final EIS.
- The selected action is fully compliant with NPS's mission and policies, and other pertinent laws and regulations.
- The selected action specifies all feasible and prudent measures to minimize environmental harm.
- The selected action was crafted through many years of public involvement and agency coordination.
- The environmental analyses demonstrate that the selected action will have beneficial effects on wilderness character and short- and long-term negligible to moderate beneficial and adverse impacts to natural and cultural resources; no major adverse impacts will occur.

ENVIRONMENTALLY PREFERABLE ALTERNATIVE

The National Park Service is required to identify an environmentally preferable alternative in its NEPA documents for public review and comment. Guidance from the Council on Environmental Quality states that the environmentally preferable alternative is the alternative that "causes the least damage to the biological and physical environment"; it also means the alternative which "best protects, preserves, and enhances historic, cultural, and natural resources" (Question 6(a) from "NEPA's Forty Most Asked Questions"). An alternative or alternatives may be identified as the environmentally preferable alternative.

The National Park Service has determined that both of the action alternatives, alternatives 2 and 3, are the environmentally preferable alternative. Both action alternatives would provide environmental benefits over the no action alternative through the use of management zoning, closures of existing roads on Santa Rosa Island, proposing wilderness designation, and establishing and monitoring user capacity indicators and standards. There is little difference between the two

alternatives because both action alternatives are strongly grounded in the provisions of laws and NPS policies for protection of resources from damage.

Both alternatives 2 and 3 would have fewer impacts on the park's natural resources than alternative 1. Although the two action alternatives would have different impacts on the environment due to their different emphases on visitor use and education activities, the adverse impacts from both alternatives on biological or physical resources, such as vegetation and wildlife, would be fairly small and localized. Alternative 1 would have a higher potential for impacts on natural resources, including minor to moderate localized adverse impacts on water quality, terrestrial plant communities, and on marine and terrestrial wildlife, largely due to expected increases in visitor use of the islands. Under alternative 3 visitor use and resource condition monitoring and analysis would be instituted before visitor use opportunities would be expanded.

With regard to cultural resource impacts, alternative 1 would have the fewest impacts of the three alternatives. Alternatives 2 and 3 would have long-term minor beneficial impacts and long-term negligible to minor adverse impacts on ethnographic resources, and would have permanent negligible to minor adverse impacts on historic structures due to potential increases in visitor levels. Alternatives 2 and 3 would result in minor to moderate adverse impacts from ground-disturbing activities on archeological resources and changes in features of the cultural landscapes. However, these adverse impacts would be mitigated such that the national register eligibility of such resources would not be jeopardized, and thus the Section 106 determination for both alternatives 2 and 3 would be *no adverse effect*. Both alternatives would also have beneficial impacts on archeological resources due to increased control of visitor access, site monitoring, and increased public education for resource stewardship.

MEASURES TO MINIMIZE ENVIRONMENTAL HARM

Congress has charged the National Park Service with managing the lands under its stewardship "in such manner and by such means as will leave them unimpaired for the enjoyment of future generations" (NPS Organic Act). NPS staff routinely evaluate and implement mitigation measures whenever conditions occur that could adversely affect the sustainability of national park system resources. Mitigation measures are the practicable and appropriate methods that will be used under the selected action to avoid or minimize harm to natural and cultural resources, wilderness character, visitors, and the visitor experience.

To ensure that implementation of the selected action applies appropriate levels of protection to natural and cultural resources and provides a quality visitor experience, a consistent set of mitigation measures will be applied to actions proposed in this plan. The National Park Service will prepare implementation plans with appropriate environmental compliance (i.e., those required by the National Environmental Policy Act (NEPA) and the National Historic Preservation Act, as amended, and other relevant legislation) for these future actions. These implementation plans will include more detailed mitigation measures for specific projects. As part of environmental compliance, the National Park Service will avoid, minimize, and mitigate adverse impacts when practicable. The implementation of a compliance-monitoring program will be within the parameters of the National Environmental Policy Act and the National Historic Preservation Act, compliance documents, U.S. Army Corps of Engineers Clean Water Act, section 404 permits, and other compliance requirements. The compliance monitoring program will oversee these mitigation measures and will include reporting protocols.

The following mitigation measures and best management practices will be applied to avoid or minimize potential adverse impacts from implementation of the selected action. The mitigation measures have been developed by using existing laws and regulations, best management practices, conservation measures, and other known techniques.

Natural Resources

General

- Park resources, including air, water, soils, vegetation, and wildlife, will be inventoried and monitored to avoid or minimize impacts of human activities and facilities on the islands.
- New facilities will be built in previously disturbed areas or in carefully selected sites with as small a construction footprint as possible.
- Site-specific surveys will be conducted before any ground disturbance takes place to make sure fossils are not present and would not be affected. If important paleontological resources were identified, the Park Service will attempt to reroute, relocate, or otherwise mitigate impacts from the actions being taken.
- New facilities will be built on soils that are suitable for development. Soil erosion will be minimized by limiting the time that soil is left exposed and by the use of various erosion control measures, such as erosion matting or silt fencing. Once work is completed, construction areas will be revegetated with native plants in a timely manner.
- Interpretive displays and programs, ranger patrols, and regulations on use levels will be used to minimize impacts from visitors.
- Areas used by visitors (e.g., trails) will be monitored for signs of native vegetation disturbance. Public education, revegetation of disturbed areas with native plants, erosion control measures, and barriers will be used to control potential impacts on plants from trail erosion or social trails.
- Visitors will be required to stay on established trails when it is deemed necessary to protect natural or cultural resources, or provide for visitor safety.
- Construction materials and supplies for island operations would be stored, transported, and inspected in a manner to minimize the potential for transporting nonnative plants or animals to or between islands.

Water Resources

- Best management practices, such as the use of silt fences, will be followed to ensure that construction-related soil erosion and loss was minimal and to prevent long-term impacts on water quality, wetlands, and aquatic species.
- Absorbent pads and booms will be kept close at hand and be readily available to clean up spills.
- Equipment will be regularly inspected for leakage of petroleum and other chemicals.
- Construction staging areas will be well away from surface water features if feasible. Likewise, no vehicle maintenance or refueling will occur within 100 feet of streams or the shoreline.
- Areas will be designated where refueling or construction vehicle and equipment maintenance will be performed, and containment devices or structures, such as temporary earth berms, will be placed around these areas.
- Revegetation plans will be developed for areas impacted by construction activities and will include the use of native species, as well as salvaging plants and topsoil.
- Any activities involving dredging or placing fill material below the ordinary high water line of streams, such as Scorpion Creek, or below the mean high tide line will comply with requirements of sections 404 and 401 of the Clean Water Act and with other applicable state permit programs.
- For new facilities, and to the extent practicable for existing facilities, stormwater management measures will be implemented to reduce nonpoint source pollution discharge from roads and

other impervious surfaces. Such actions could include oil/sediment separators, infiltration beds, and use of permeable surfaces and vegetated or natural filters to trap or filter stormwater runoff.

Floodplains and Wetlands

- Wetlands will be delineated by qualified NPS staff or certified wetland specialists and marked if construction of new facilities were to occur near them.
- New permanent facilities will not be built in wetlands, if feasible. If avoiding wetlands is not feasible, other actions will be taken to comply with EO 11990, "Protection of Wetlands," the Clean Water Act, and DO-77-1: *Wetland Protection*.
- Special precautions will be taken to protect wetlands from damage caused by construction equipment, erosion, siltation, and other activities with the potential to affect wetlands (e.g., delineation of construction site limits and placement of silt fences). Construction materials will be kept in work areas, especially if the construction takes place near natural drainages.
- If possible, new structures, other than water-related developments such as boat docks, would be located outside of 100-year floodplains. Fuel storage facilities and storage of toxic or hazardous materials would be located outside of the 500-year floodplains.
- No new permanent facilities will be built in the Scorpion Valley floodplain (flood channel). Continued use of the existing facilities will require the continued periodic excavation of sediment from the channel to keep the stream in the active channel away from park facilities, although even with channel excavation it can be expected that floodwaters will continue to periodically damage the masonry and nearby structures (NPS 2003b). This excavation will occur approximately from a point 300 feet downstream from the windmill to a point somewhat upstream of the confluence of the horse corral tributary; and the dimensions excavated will be about 20 to 25 feet wide by 4 to 5 feet deep (NPS 1998). Construction equipment will be required to stay on the creek bed in the area where sediments were being removed, instead of being driven along the banks of the creek, which would damage vegetation.
- Because the Scorpion masonry building and other ranch structures will continue to be vulnerable to damage and loss during large floods, even with the above measures, no irreplaceable records, archaeological artifacts, or museum collections will be placed in the buildings. Signs also will be placed in the masonry building informing visitors and staff of the flood risk and suggested actions in the event of flooding (e.g., an evacuation route).
- In the Prisoners Harbor area, because floods will not be expected to occur frequently, managers could elect to simply clean up and repair the building after future flood events. To protect the warehouse, flows may be directed back toward the stream channel if it floods. This would be done in consultation with a hydrogeologist. Also, if new structures are built in this area, the structures will be elevated by about 2 feet above the existing ground surface to protect the structures from floods.

Native Vegetation and Wildlife

- Facilities will be designed and sited to use previously disturbed sites to the extent practicable. Other individual management actions to avoid or minimize the extent and severity of impacts will also be implemented, such as localized area or seasonal use restrictions and confining or directing use through the use of barriers, trails, and designated campsites.
- Restoration of native vegetative communities will rely on natural regeneration and succession, as well as active measures. The main goal is to assist natural regeneration in reestablishing a sustainable native plant community. Rehabilitation of road corridors will include removal of the existing road surface and recontouring, supplemented with soil salvage, removal of nonnative plant species, scarification, mulching, seeding, and/or planting with native species.
- Visitors will be informed about the special nature of Channel Islands' ecosystems and the potential for spreading nonnative species on the islands before they come to the islands. Boot

scrapers, brushes, and other means will be provided to visitors to reduce the likelihood of accidentally introducing species on the islands.

- Visitor use areas will be monitored for signs of native vegetation and wildlife disturbance, and the introduction of nonnative species. Public education, revegetation of disturbed areas with native plants, erosion control measures, and barriers will be used to control potential impacts from visitors along roads, trails, or social trails.
- A variety of techniques will be employed to minimize or avoid impacts on native vegetation and wildlife, including visitor education programs; ranger patrols; and use restrictions (permitted activities, locations, and times) in areas with rare plants, vegetative communities, and/or sensitive wildlife populations and habitats.
- The fenced area of the ranch complex in Scorpion Valley will be adaptively managed to support persistence of the Townsend's big-eared bat maternity colony on Santa Cruz Island. Access and the use of machinery will be restricted in the vicinity of the bakery during the maternity season (generally April through August) and access for the bats into the bakery will be maintained.
- Park staff will periodically inspect and clean NPS boats to avoid the transport of nonnative species, require concessioners to follow similar procedures for their boats, and work with the State of California to educate private boaters about the need to inspect and clean their boats.

Special Status Species (Threatened and Endangered Species, Pinnipeds, Endemics)

- Surveys will be conducted for special status species before implementing any action that might cause harm. Facilities would be designed and sited to avoid adverse impacts. In consultation with the U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service, and California Department of Fish and Wildlife, measures will be taken to protect any sensitive species and their habitat. Areas proposed for new developments will be surveyed for the presence of threatened and endangered species prior to construction.

To minimize or avoid impacts of campers on island foxes, the following measures will be taken at all campgrounds on Santa Cruz, Santa Rosa, and San Miguel Islands:

- Visitors will be required to use food storage boxes provided at the campgrounds.
- Signs will identify the need to store food in the storage boxes.
- Campgrounds will be patrolled and regulations enforced against feeding island foxes.

Management practices to protect western snowy plover and California brown pelican nesting areas and pelican roosting areas will continue to be implemented, such as closing portions of beaches to visitor use, prohibiting camping on beaches during nesting periods, prohibiting pets on the islands, monitoring the nesting areas throughout the breeding season, and minimizing trash along the beach that attracts predators. The nesting areas that are more vulnerable to visitor disturbance because of their accessibility will continue to be more intensively monitored to protect the birds. The Park Service will continue to work cooperatively with the Fish and Wildlife Service to identify and implement appropriate mitigation measures to protect plover and pelican nesting and roosting areas within the park. Seasonal closure may be implemented to protect other nesting seabirds.

Offshore rocks will continue to be closed to public access to protect pinnipeds or nesting seabirds. As necessary, dry seacaves or other areas may be closed to protect nesting birds.

Management practices to protect pinnipeds and other sensitive wildlife will be implemented as necessary.

Where visitor use near listed or rare plant populations will occur and there is the likelihood of disturbance to plants, visitors will be alerted about the need to stay on trails. If necessary, plant populations will be protected by placement of signs and fencing. New developments, including trails, will be sited to avoid disturbing or providing access to sensitive endemic plant populations. Seasonal trail closures may be implemented to protect rare plant populations.

Fire is a special concern on Santa Rosa and Santa Cruz Islands. A wildfire could extirpate several federally listed plant species. To address this potential threat, NPS staff will take the following actions.

- Educate visitors and NPS staff about the potential wildfire threat, why campfires are not permitted, and the need for care when using camp stoves in the backcountry.
- Establish seed collections of listed plant species, which can be used to replant areas if a wildfire occurs.

NPS staff and partners will also adhere to responsibilities and restrictions necessary to protect sensitive and rare plants and animals.

Cultural Resources

The National Environmental Policy Act requires a discussion of the “appropriateness” of mitigation and an analysis of the effectiveness of mitigation. A reduction in the intensity of an impact from mitigation is an estimate of the effectiveness of this mitigation under the National Environmental Policy Act. It does not suggest that the level of effect, as defined by implementing regulations for Section 106 of the National Historic Preservation Act, is similarly reduced. Although adverse effects under Section 106 may be mitigated, the effects remain adverse.

Adverse impacts on properties listed in, or determined eligible for listing in, the national register would be avoided if possible. If adverse impacts could not be avoided, these impacts would be mitigated through a consultation process with all interested parties.

Mitigation includes the avoidance of adverse effects on cultural resources. Avoidance strategies may include the application of the *Secretary of the Interior’s Standards and Guidelines for Archeology and Historic Preservation* or design methodologies recommended in DO-28: *Cultural Resource Management Guideline*; NPS *Management Policies 2006*, Chapter 5; DO-28A: *Archeology*, 36 CFR 79 (with guidelines for curating archeological collections); and the *Programmatic Agreement among the National Park Service, Advisory Council on Historic Preservation, National Conference of State Historic Preservation Officers for Compliance with Section 106 of the National Historic Preservation Act* (2008). Presented below is a description of typical mitigation measures.

Archeological Resources (Including Submerged Maritime Resources)

Wherever possible, projects and facilities will be located in previously disturbed or existing developed areas. Any undertakings under alternative 2 will include substantial testing during the planning phase to avoid impacts on archeological resources. The park staff will make every effort to avoid archeological resources in siting its development projects and avoidance of ground disturbance. Facilities will be designed to avoid known or suspected archeological resources. If avoidance of archeological resources was not possible, mitigation strategies will be developed in consultation with all interested parties to recover information that makes sites eligible for inclusion in the national register.

Archeologists will monitor ground-disturbing construction in areas where subsurface remains might be present. If previously unknown archeological resources were discovered during construction, work in the immediate vicinity of the discovery would be halted until the resources could be identified, evaluated, and documented, and an appropriate mitigation strategy was developed, if necessary, in consultation with the California state historic preservation office. Mitigation work involving submerged maritime resources will be undertaken in cooperation with the State of California and Channel Islands National Marine Sanctuary as necessary. In the unlikely event that human remains, funerary objects, or objects of cultural patrimony were discovered during construction, applicable provisions of the Native American Graves Protection and Repatriation Act will be implemented.

Historic Structures/Buildings

All project work relating to historic structures / buildings would be conducted in accordance with the guidelines and recommendations of the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*. Typical mitigation measures for historic structures / buildings include measures to avoid impacts, such as rehabilitation and adaptive reuse, designing new development to be compatible with surrounding historic properties, and screening new development from surrounding historic resources to minimize impacts on cultural landscapes and ethnographic resources.

Cultural Landscapes

All project work relating to cultural landscapes will be conducted in accordance with the guidelines and recommendations of the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes*. Typical mitigation measures for cultural landscapes include measures to avoid impacts, such as designing new development to be compatible with surrounding historic properties and screening new development from surrounding cultural landscapes to minimize impacts on those landscapes. Cultural landscape reports will be prepared prior to projects with potential for impacts on contributing features of cultural landscapes to ensure that adverse impacts on cultural landscapes are avoided or minimized.

Ethnographic Resources

The Park Service will continue to consult with culturally associated American Indian tribes and other traditionally associated groups to develop appropriate strategies to mitigate impacts on ethnographic resources. Such strategies could include identification of and assistance in providing access to alternative resource gathering areas, continuing to provide access to traditional use or spiritual areas, and screening new development from traditional use areas to minimize impacts on ethnographic resources.

Scenic Resources

Mitigation measures are designed to minimize visual intrusions. These include the following:

- Design, site, and construct facilities to avoid or minimize visual intrusion into the natural landscape.
- Provide vegetative screening, where appropriate.

Sustainable Design and Aesthetics

- Projects will avoid or minimize adverse impacts on natural and cultural resources.
- Development projects (e.g., buildings, facilities, utilities, roads, bridges, and trails) or reconstruction projects (e.g., road reconstruction, building rehabilitation, and utility upgrades) will be designed to work in harmony with the surroundings, particularly in historic districts.
- Projects will reduce, minimize, or eliminate air and water nonpoint source pollution.
- Projects will be sustainable whenever practicable by recycling and reusing materials, by minimizing materials, by minimizing energy consumption during the project, and by minimizing energy consumption throughout the lifespan of the project.

PUBLIC, NATIVE AMERICAN AND AGENCY INVOLVEMENT

The *Final General Management Plan / Wilderness Study / Environmental Impact Statement* was based on input from the National Park Service, other agencies, Native Americans, and interested persons and organizations. Consultation and coordination was an important part of this project. The public had three primary avenues for participation during the development of the plan: participation in public meetings; response to newsletters; and comments submitted by regular mail and through the NPS Planning, Environment, and Public Comment (PEPC) system website.

Plan Development

Public meetings and newsletters were used to keep the public informed and involved in the development of the plan for Channel Islands National Park. A mailing list was compiled that consisted of members of governmental agencies, nongovernmental groups, businesses, legislators, local governments, and interested citizens.

The notice of intent to prepare an environmental impact statement was published in the *Federal Register* on November 8, 2001. A newsletter issued in October 2001 described the planning effort. A total of 53 electronic and mailed comments were received in response to that newsletter. Public meetings were held on November 12, 2001 (Santa Barbara); November 13, 2001 (Los Angeles); November 14, 2001 (Oxnard); and November 15, 2001 (Ventura). The planning team also met on April 11, 2002 with representatives from the Coast Guard, Minerals Management Service, U.S. Navy, Fish and Wildlife Service, National Marine Fisheries Service, California Department of Fish and Wildlife, California Regional Water Quality Control Board, California State Historic Preservation Office, Ventura County, Ventura Port District, Santa Cruz Island Foundation, and Vail & Vickers to listen to their concerns for the plan. In addition, planning team members met with representatives from The Nature Conservancy and the sanctuary to discuss their concerns. Comments received in the above meetings and in response to the newsletter were incorporated into issues for the plan.

A second newsletter distributed in August 2002 described the preliminary alternatives for managing the park. In addition, public meetings were held on the preliminary alternatives on September 18, 2002 (Ventura) and on September 19, 2002 (Santa Barbara). A total of 91 separate written responses (including mailback response forms, letters, and e-mails) were received in response to the newsletter. The respondents were fairly evenly spread out among their favored alternatives – no one alternative stood out substantially above the others.

A notice of intent to expand the scope of the environmental impact statement to include a wilderness study was published in the *Federal Register* on April 8, 2009. Public informational open houses were

subsequently held at the park headquarters on June 17, 2009, and at Santa Barbara on June 18, 2009. Comments on proposing wilderness for the park were requested to be submitted through the mail and the PEPC website. Three comment letters were received.

Release of the *Draft General Management Plan/Wilderness Study/ Environmental Impact Statement*

The NPS notice of availability of the *Draft Channel Islands National Park General Management Plan / Wilderness Study / Environmental Impact Statement* was published in the November 14, 2013 *Federal Register*. The comment period on the draft plan ran from November 8, 2013 through March 10, 2014. This comment period included two consecutive 30-day extensions beyond the original closure date. Public meetings on the draft plan were held at the park headquarters on December 3, 2013, and at Santa Barbara on December 4, 2013. The park headquarters meeting also included a public hearing for the wilderness study, as required under the Wilderness Act.

A total of 1,091 pieces of correspondence were received from individuals, organizations, and agencies. Although comments from unaffiliated individuals were by far the largest source of comments, a variety of federal and state agencies, city government, recreation groups, businesses, conservation groups, nonprofit groups, and other organizations provided comments. Comments focused primarily on 1) wilderness designation; 2) whether or not to increase visitor access; 3) whether or not to provide new commercial services and visitor facilities, and 3) concerns regarding the spread of invasive nonnative species in the park

Based on the comments the planning team received on the draft plan, a number of changes were made in the final plan. The major changes that were made in the final plan are listed below:

- The wilderness proposal for east Santa Cruz (14,476 acres) and Santa Rosa (50,802 acres) Islands was changed to propose these areas as potential wilderness due to several continuing nonconforming uses.
- The number of accommodations for the concessioner on Santa Cruz Island was reduced from 18 people to no more than 12 (most housed in seasonal tents).
- Mitigation measures were proposed to protect the Townsend's big-eared bat in Scorpion Valley on Santa Cruz Island.
- Zoning of the Prisoners Harbor frontcountry area was broadened on Santa Cruz Island.
- The scope of the visitor shuttle system on Santa Rosa Island was reduced, with the shuttle being proposed to take visitors from Bechers Bay only to Torrey Pines, Johnsons Lee and Lobo Canyon.
- The proposal for lodging at Bechers Bay was changed to provide only rustic, economy accommodations.
- The user capacity was changed from 500 people per day at Bechers Bay to 500 people per day for all of Santa Rosa Island.
- A third possible location was added for the research field station — the ranch itself.
- Biosecurity protocols to prevent the introduction of nonnative species to the park were included as part of the plan.
- An action was added to the plan indicating park managers would work with the Channel Islands National Marine Sanctuary, the National Marine Fisheries Service, and the State of California to evaluate the impact of anchoring by private boaters and determine if environmentally sensitive mooring devices should be employed in the park.

Release of the *Final General Management Plan/Wilderness Study/ Environmental Impact Statement*

The *Final General Management Plan / Wilderness Study /Environmental Impact Statement* was released on April 17, 2015. On April 17, 2015, the Environmental Protection Agency published its notice of filing of the final EIS in the *Federal Register*, initiating the minimum 30-day "no action" waiting period. The NPS Notice of Availability was published in the April 21, 2015, *Federal Register*, vol. 80, no. 76. The public was informed of the release through email messages to individuals and organizations on the park's mailing list and via a press release. The 30-day no action period ended on May 18, 2015.

Following release of the final environmental impact statement for public inspection, the NPS received letters from one individual and three organizations, including The U.S. Environmental Protection Agency, National Parks and Conservation Association, and The Nature Conservancy. The letters were thoroughly reviewed and no new issues or questions were raised that would require modification to the General Management Plan / Wilderness Study /Environmental Impact Statement or would lead to the selection of other alternatives or change the determination that the preferred alternative is the environmentally preferred alternative.

Consultation with the State Historic Preservation Office and the Advisory Council on Historic Preservation

Agencies that have direct or indirect jurisdiction over historic properties are required by Section 106 of the National Historic Preservation Act of 1966, as amended (16 USC 470, et seq.) to take into account the effect of any undertaking on properties eligible for the national register. To meet the requirements of 36 CFR 800, the Park Service sent letters to the state historic preservation office and the advisory council on September 10, 2001, inviting their participation in the planning process. Both offices were sent all of the newsletters with a request for comments on the draft and final plan/EIS. No comments were received from the advisory council. On August 17, 2015, the California state historic preservation officer concurred with the finding of no adverse effect to historic properties as described in the final plan/EIS and the plan's errata sheet.

Consultation with Native Americans

On September 10, 2001, a letter was sent to the Santa Ynez Band of the Mission Indians, the only federally recognized tribe associated with the park, to invite their participation in the planning process. Other groups and members of the Chumash community were briefed on the scope of the planning project and the preliminary alternatives by newsletter. In early 2011, the park staff held consultation meetings with the Chumash community to seek their input prior to the completion of this draft GMP/EIS. Copies of the draft and final plans were sent to the Santa Ynez Band and groups and members of the Chumash community with a request for their comments. No comments were received from them, except for a letter from the Wishtoyo Foundation, which represented some members of the Chumash, on the draft plan.

Section 7 Consultation with the Fish and Wildlife Service and National Marine Fisheries Service

The Endangered Species Act of 1973, as amended, requires in section 7(a)(2) that each federal agency, in consultation with the secretary of the interior, ensure that any action the agency authorizes, funds, or carries out is not likely to jeopardize the continued existence of a listed species or result in the destruction or adverse modification of designated critical habitat.

Informal consultation with the U.S. Fish and Wildlife Service and National Marine Fisheries Service began in August 2002 with a request for a list of threatened and endangered species that may occur in or near the park. Responses were received on August 30, 2002 and December 13, 2002. (The National Marine Fisheries Service subsequently dropped three of the species petitioned for listing under the Endangered Species Act.)

As noted in the final plan/environmental impact statement, none of the marine listed species under the jurisdiction of the National Marine Fisheries Service would be affected by the actions in this plan. Consequently, no further consultations were required for these species.

The National Park Service evaluated in detail the plan's potential for effects on the two listed wildlife species (island fox and western snowy plover) and six plant species (Hoffmann's slender-flowered gilia, Santa Rosa Island manzanita, Santa Cruz Island chicory, Hoffmann's rock-cress, island barberry, and island rush-rose) under the jurisdiction of the Fish and Wildlife Service. The National Park Service initially determined these species may be affected but would not likely be adversely affected. However, upon further analysis and discussion with the Fish and Wildlife Service, the National Park Service determined the selected action will have no effect on the listed species (see the errata for an explanation of this revision in the impact analysis.) The National Park Service will continue to consult and work with the Fish and Wildlife Service in the future to ensure the conservation of these listed species, and to take appropriate actions to avoid potential impacts to the listed species.

Coastal Zone Management Consistency Determination and Consultation

Federal agency activities in or affecting California's coastal zone must comply with § 307 of the Coastal Zone Management Act and implementing regulations, which require that such federal activities be conducted in a manner consistent to the maximum extent practicable with California's Coastal Management Program.

Although Channel Islands National Park is federal land and excluded from California's coastal zone, the park is geographically within the coastal zone. The Park Service has determined that the preferred alternative described in this plan is consistent with California's Coastal Management Program. Specifically, the preferred alternative is consistent with chapter 3 of the California Coastal Act of 1976 regarding public access, recreation, the marine environment, land resources, and development.

This plan provides the substantive basis for the NPS's consistency determination and the Park Service has submitted this document to the California Coastal Commission for its concurrence. This consistency determination and the commission's concurrence comply with the requirements of the Coastal Zone Management Act.

The California Coastal Commission in a letter dated May 14, 2015, stated that with the NPS commitment for further coordination before any implementation or construction of the proposed actions occur, it concurred with the NPS determination made pursuant to Section 15 CFR 930.35 of the NOAA implementing regulations.

Consultation with the U.S. Navy

Because the National Park Service manages San Miguel Island under an agreement with the U.S. Navy, it is important to consult with the U.S. Navy on all resource, visitor, and administrative management activities on the island. The park staff have been seeking input from the U.S. Navy on the general management plan throughout the planning process. The Park Service will seek additional consultation with the U.S. Navy prior to implementation of the proposed actions on San Miguel Island in this plan. All proposed actions on San Miguel Island are subject to the U.S. Navy and Park Service entering into an agreement and the terms and conditions associated with the agreement.

CONCLUSION

The National Park Service has selected the preferred alternative (alternative 3) as its general management plan for Channel Islands National Park. The selected action best complies with NPS management policies, and best meets the management objectives to preserve Channel Islands National Park's natural and cultural resources while also providing increased opportunities for the use and enjoyment of the park. The selected action also is fully compliant with other pertinent laws and regulations.

The selected action proposes 1,298 acres of the park be designated as wilderness, on Anacapa, Santa Barbara, Santa Rosa and Santa Cruz Islands and on assorted rocks and islets, and 65,278 acres be designated as potential wilderness on Santa Rosa and Santa Cruz Islands. With the concurrence of the NPS director, the NPS wilderness proposal will be sent to the assistant secretary of fish, wildlife and parks and the secretary of the interior, who may revise or approve the proposal. The secretary may then forward a wilderness recommendation to the president, who in turn may approve or revise the recommendation and then transmit the recommendation to Congress for consideration.


Martha J. Lee
Acting Regional Director
Pacific West Region, National Park Service

9/14/15
Date

APPENDIX A: ERRATA SHEETS

GENERAL MANAGEMENT PLAN / WILDERNESS STUDY/ ENVIRONMENTAL IMPACT STATEMENT

CHANNEL ISLANDS NATIONAL PARK

Corrections and revisions to the *Channel Islands National Park Final General Management Plan / Wilderness Study / Environmental Impact Statement* are listed in this section. Revisions were made in response to comments from public and agency reviews of the environmental impact statement. These revisions have not resulted in substantial modification of the selected action. It has been determined that the revisions do not require additional environmental analysis. The page numbers referenced are from the *Channel Islands National Park Final General Management Plan / Wilderness Study / Environmental Impact Statement* dated April 2015.

TEXT CHANGES

On page 135, left column, 6th bullet, change to: "ground transportation for visitors would be provided to three two destinations on Santa Rosa Island via a concessioner"

On page 180, right column, 1st bullet, change to: "Visitors would be required to stay on established trails when it is deemed necessary to protect natural or cultural resources, or provide for visitor safety."

On page 181, left column, 2nd bullet under "Floodplains and Wetlands: change to: New permanent facilities developments would not be built in wetlands, if feasible..."

On page 182, right column, 3rd bullet, change to: "The fenced area of the ranch complex in Scorpion Valley would be adaptively managed to support persistence of the Townsend's big-eared bat maternity colony on Santa Cruz Island."

On page 183, left column, 2nd paragraph, change text to read: "To minimize or avoid impacts of campers on island foxes, the following measures would be taken at all new campgrounds all campgrounds on Santa Cruz, Santa Rosa, and San Miguel Islands:"

On page 183, left column, 2nd paragraph, 2nd bullet, change to: "Signs would ~~be erected regarding the presence of island foxes and~~ identify the need to store food in the storage boxes."

On page 183, left column, 3rd paragraph, 4th-5th lines change to: "...pelican roosting areas would continue to be implemented, such as closing portions of beaches to visitor use..."

On page 183, left column, add text to the end of the 3rd paragraph as follows: "...roosting areas within the park. Seasonal closure may be implemented to protect other nesting seabirds."

Offshore rocks would continue to be closed to public access to protect pinnipeds or nesting seabirds. As necessary, dry seacaves or other areas may be closed to protect nesting birds.

Management practices to protect pinnipeds and other sensitive wildlife will be implemented as necessary."

On page 183, left column, bottom paragraph, change to: "Where visitor use near listed or rare plant populations will occur, such as Lobo Canyon, and there is the likelihood of disturbance to plants, visitors would be alerted about the need to stay on trails. ... If necessary, plant populations would be protected by placement of signs and fencing. New developments, including trails, would be sited to avoid disturbing or providing access to sensitive endemic plant populations. Seasonal closures may be implemented to protect other nesting birds.

On page 183, right column, delete the 2nd and 3rd bullets, and add the following new sentence:

- ~~Close areas when there is a high fire danger.~~
- ~~Establish seed collections of listed plant species, which can be used to replant areas if a wildfire occurs.~~

"NPS staff and partners would also adhere to responsibilities and restrictions necessary to protect sensitive and rare plants and animals."

On page 185, left column, delete the first bullet:

- ~~Where appropriate, use facilities such as boardwalks and fences to route people away from sensitive natural and cultural resources, while still permitting access to important viewpoints.~~

On pages 209 and 395-399 in the analysis of effects of the selected action (alternative 3) on threatened and endangered species, the conclusion stated with expected visitor use levels on the islands there would be negligible to minor adverse effects which may affect, but would not likely adversely affect, the island fox, snowy plover, Santa Cruz Island chicory, island rush-rose, Santa Rosa manzanita, Hoffmann's rock-cress, and island barberry, and there could be a long-term minor beneficial impact on the Hoffmann's slender-flowered gilia. The analysis and conclusion are replaced with the following:

Upon further analysis, the National Park Service has determined the selected action will have no effect on these species. For the listed plant species, no actions are being proposed that will likely result in people walking off trail. Visitors mostly stay on trails in the park and the National Park Service has the management authority to expand "trails only" requirements as necessary to protect park resources. With the application of the mitigation measures, including education of visitors regarding the presence of listed plants and the potential threat of fires, seasonal trail closures when necessary to protect these plants, and placement of signs and fencing when necessary, impacts to these listed plant species will be avoided.

Likewise, for the western snowy plover as stated in the mitigation measures nesting areas will continue to be protected through beach closures, prohibiting camping on beaches during nesting periods, prohibiting pets on the islands, monitoring of nesting areas, and minimizing trash that attracts predators. Visitor use is not expected to measurably increase on beaches that plovers use as a result of the selected action. With education outreach efforts and periodic NPS patrols, no impacts are expected that will affect plover numbers, distribution, or reproduction in the park.

With regard to the island fox, no actions are being proposed that will result in foxes that are dependent on campgrounds and people for food. No such foxes are known to be present in the park. Island foxes seasonally visit campgrounds, island housing, and picnic areas. Although new campsites are being proposed in the selected action, and island foxes may seasonally visit these areas foraging for food, the ongoing mitigation measures (i.e., required use of food storage boxes, orientation and

education of campers about the foxes, and ranger patrols to ensure that visitors do not feed foxes) are expected to prevent the habituation or dependence of island foxes. No actions are being proposed that will measurably alter the number, distribution, or reproduction of the foxes.

Park managers will continue to consult and work with the Fish and Wildlife Service to ensure the continued protection and conservation of all of the federally listed threatened and endangered species in the park and ensure that no adverse effects occur to these species.

The following changes all apply to the analysis of cultural resources Chapter 4: Environmental Consequences:

On page 318 in "Impacts on Cultural Resources and Section 106 of the National Historic Preservation Act," add the following text after the first paragraph of this section: "For this plan the area of potential effects comprises the entire area within the NPS-authorized park boundary for Channel Islands National Park, as illustrated on Map 1 on page 10. This area is shown in greater detail on Map 3: Anacapa Island (page 70), Map 4: Santa Cruz Island (page 74), Map 5: Scorpion Valley (page 75), Map 6: Prisoners Harbor (page 77), Map 7: Santa Rosa Island (page 81), Map 8: Bechers Bay (page 83), Map 9: Johnsons Lee (page 85), Map 10: San Miguel Island (page 88), and Map 11: Santa Barbara Island (page 90). The historic properties contained within the area of potential effects are described in Chapter 3: Affected Environment in the cultural resources section on pages 277 through 297."

On page 318 in "Impacts on Cultural Resources and Section 106 of the National Historic Preservation Act," add the following text after the second paragraph of this section: "Future undertakings associated with this plan for which the details of the impact are not yet known will be analyzed under Section 106 separately from this plan on a case-by-case basis under the framework of the Programmatic Agreement among the National Park Service, Advisory Council on Historic Preservation, National Conference of State Historic Preservation Officers for Compliance with Section 106 of the National Historic Preservation Act (2008), as applicable, or by using the standard consultation process under 36 CFR 800."

On page 319 in "Impacts on Cultural Resources and Section 106 of the National Historic Preservation Act," add the following text at the end of the first paragraph: "Further, the Section 106 analysis, summary, and consultation in this document refers only to undertakings included in this General Management Plan and does not address actions outside of this plan."

On page 401 in "Impacts of Alternative 3 / Cultural Resources / Archeological (including Submerged Maritime) Resources / Analysis," add the following text to the end of the second paragraph: "A full assessment of the impacts of such construction activities on archeological resources would be conducted separately from this plan when the details of these undertakings become known in the future."

On page 402 in "Cultural Resources / Archeological (including Submerged Maritime) Resources / Section 106 Summary," delete: "After applying the advisory council's criteria of adverse effects (36 CFR Part 800.5, Assessment of Adverse Effects), the Park Service concludes the proposed undertakings outlined in alternative 3 would most likely be no adverse effect on archeological resources. The adverse effect determination would result from ground disturbing activities," and replace it with the following: "After applying the advisory council's criteria of adverse effects (36 CFR Part 800.5, Assessment of Adverse Effects), the National Park Service concludes the proposed undertakings outlined in alternative 3 would result in no adverse effect on archeological resources. Although

alternative 3's actions would have some direct or indirect impacts to archeological resources, the impacts would be limited and would not diminish the characteristics of archeological resources that qualify them for inclusion in the National Register of Historic Places. Future undertakings associated with this plan for which the details of the impact are not yet known will be analyzed under Section 106 separately from this plan on a case-by-case basis, and under the framework of the Programmatic Agreement among the National Park Service, Advisory Council on Historic Preservation, National Conference of State Historic Preservation Officers for Compliance with Section 106 of the National Historic Preservation Act (2008), as applicable, or by using the standard consultation process under 36 CFR 800."

On page 403 in "Ethnographic Resources / *Section 106 Summary*," add the following text:
"Although alternative 3's actions would have some minor direct or indirect impacts to ethnographic resources, the impacts would be limited and would not diminish the characteristics of these resources that qualify them for inclusion in the National Register of Historic Places. Future undertakings associated with this plan for which the details of the impact are not yet known will be analyzed under Section 106 separately from this plan on a case-by-case basis."

On page 404 in "Historic Structures/Buildings / *Section 106 Summary*," add the following text:
"Although alternative 3's actions would have some direct or indirect impacts to historic buildings and structures, the impacts would be limited and would not diminish the characteristics of these resources that qualify them for inclusion in the National Register of Historic Places. Future undertakings associated with this plan for which the details of the impact are not yet known will be analyzed under Section 106 separately from this plan on a case-by-case basis."

On page 404 in "Cultural Landscapes / Analysis," in the third paragraph replace "Any adverse impacts would be long-term and minor" with the following: "Any adverse impacts are anticipated to be long-term and minor. A full assessment of the impact of these actions on cultural landscapes would occur in the future separately from this plan when the details of these projects become known."

On page 405 in "Cultural Landscapes / Analysis," in the first paragraph replace "The impact from the tree removal would be long-term, moderate, and adverse," with the following: "The impact from the tree removal activities would be assessed in the future separately from this plan when the details of this action become known."

On page 405 in "Cultural Landscapes / Analysis," in the second paragraph replace "The impact from the tree removal would be long-term, moderate, and adverse," with the following: "The impact from the tree removal would be assessed in the future separately from this plan when the details of this action become known."

On page 405 in "Cultural Landscapes / *Section 106 Summary*," add the following at the end of the paragraph, "Although alternative 3's actions would have some direct or indirect impacts to cultural landscapes, the impacts would be limited and would not diminish the characteristics of these resources that qualify them for inclusion in the National Register of Historic Places. Future undertakings associated with this plan for which the details of the impact are not yet known will be analyzed under Section 106 separately from this plan on a case-by-case basis."

The following changes apply to Chapter 5: Consultation and Coordination:

On page 423 in "Future Compliance Requirements / Cultural Resources," replace "Some of these actions are covered by programmatic exclusions and would require no further state historic preservation office (SHPO)/ACHP review. Other actions would need further SHPO/ACHP review. This information is presented in Table 25," with the following: "Some of these actions are covered by the Programmatic Agreement among the National Park Service, Advisory Council on Historic Preservation, National Conference of State Historic Preservation Officers for Compliance with Section 106 of the National Historic Preservation Act (2008), and would require no further state historic preservation office (SHPO)/ACHP review under the parameters of this programmatic agreement. Other actions that do not meet the standards of this 2008 programmatic agreement would need further SHPO/ACHP consultation separate from this plan. This will be determined on a project-by-project basis when the details of these actions become further defined in the future. Potential future undertakings that would require future SHPO consultation are identified, but not limited to, the actions listed in Table 25. The actions shown in Table 25 are not intended as a comprehensive list of future undertakings that will require Section 106 consultation as described."


On page 423, in Future Compliance Requirements / Cultural Resources," replace the title of Table 25 from ~~"Implementation Actions that Could Affect Cultural Resources and Associated SHPO and ACHP Compliance Requirements"~~ to "Implementation Actions that Could Affect Cultural Resources and Would Require Additional SHPO and ACHP Compliance Requirements."


On page 423, in Table 25 under the column heading "Actions," add the following text in the third row: "Elimination, control, or management of invasive nonnative vegetation and trees on various islands, such as the olive trees at Smuggler's Cove and the eucalyptus trees at Scorpion Valley on Santa Cruz Island."

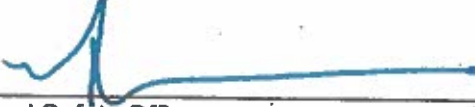
APPENDIX B. STATEMENT OF FINDINGS FOR SCORPION CREEK


STATEMENT OF FINDINGS FOR
EXECUTIVE ORDER 11988 FLOODPLAIN MANAGEMENT
SCORPION VALLEY DEVELOPED AREA, SANTA CRUZ ISLAND
GENERAL MANAGEMENT PLAN/ENVIRONMENTAL IMPACT STATEMENT

CHANNEL ISLANDS NATIONAL PARK

Recommended:  August 25, 2013
Superintendent, Channel Islands National Park Date

Concurred:  8/27/2015
Chief, Water Resources Division Date

Concurred:  9/11/2015
Regional Safety Officer Date

Approved:  9/14/2015
Director, Pacific West Region Date

INTRODUCTION

In accordance with Executive Order 11988, "Floodplain Management" and NPS guidelines for implementing the order, the Park Service has evaluated the flood hazards for the developments in Scorpion Valley, Santa Cruz Island, and has prepared this statement of findings (SOF). As an integral part of the effort to develop a general management plan (plan) for the park, the SOF describes the flood hazard, alternatives, and mitigation measures for the continued use of this area. Additional detail regarding the park, future actions to be taken in the area, and environmental impacts may be found in the *General Management Plan / Environmental Impact Statement* (plan).

Much of the following text is based on two reports on the area prepared by the NPS Water Resources Division (NPS 1998, 2003), and from a 1995 trip report (NPS 1995).

Description of the Site

Scorpion Creek drains a small portion of the north side of the easternmost tip of Santa Cruz Island. The watershed area is approximately 2.4 square miles, with a total relief of 1,350 feet and a total length of slightly less than 3 miles. The watershed is steep and highly dissected. The creek is alluvial (depositional) for about 1.5 miles upstream from its mouth. Upstream from that point the stream is extremely steep and deeply incised.

Scorpion Creek experiences wide fluctuations in flow. Generally in the summer the creek does not flow, except after occasional storms. In the winter heavy storms over a period of several days can produce large flows.

Because Scorpion Valley is a relatively narrow valley confined by steep hillsides, developments and uses of this area occur largely along the bottom of the valley. The lower alluvial reaches of the valley have a long history of human occupation. Ranch structures dating back to the 1800s are located on the left side of the valley, approximately 700 to 1,200 feet upstream from the mouth of the creek, including a historic masonry building. Farther upstream, a campground with 40 sites is spread out along the valley floor 0.5 to 1 mile from the beach.

General Characterization of Floodplain Values, Nature of Flooding, and Associated Floodplain Processes in the Area

Scorpion Valley's natural floodplain values have largely been altered by past human habitation. Vegetation cover is poor due in large part to a long history of intensive grazing by domestic animals.

Geomorphically, the area is very unstable due to the steep mainstem and tributary channels upstream and the erodible nature of the surrounding hillsides. Watershed conditions in this area are such that rainfall runs off the surrounding hillside surfaces rapidly, mass hillslope failures are common, and tributary channels are extremely erosive. It is likely that debris flows occur on steep tributaries during periods of intense rainfall, contributing enormous amounts of sediment to the stream. These heavy sediment loads can exacerbate flooding; sediment deposition can change the local paths of streamflows and frequencies of inundation.

Scorpion Valley is subject to periodic floods, some of which can be large events, although there are no long-term data on the frequency of flooding. As with other drainages on Santa Cruz Island, flooding usually occurs in the winter after several days of heavy rain.

All of the developments in Scorpion Valley, including the campground, are in the floodplain, and many are within the historic stream channel. Extremely active sedimentation processes interact with streamflow to cause frequent realignments of the channel throughout the entire width of the lower valley. Sediments also can accumulate in the channel, which results in the stream overflowing its banks and causing sedimentation in surrounding areas. Evidence indicates that periodic channel excavation historically has been required to minimize flooding and debris accumulation and thus permit sustained occupation of the valley.

JUSTIFICATION FOR USE OF THE FLOODPLAIN

Description of the Selected Alternative and Why Facilities Would be Retained in the Floodplain

The alternative selected for GMP implementation retains the historic ranch structures (including the masonry building) and the campground in their present locations. All of these structures are in the active flood channel, while the campground is considered to be in the 100-year floodplain (NPS 1995, 1998, 2003). In addition, under the approved GMP a storage structure and tents for concessionaire use during the primary use season would be placed in the floodplain.

As noted in the "Affected Environment" section (FEIS), the floodplain for Scorpion Creek extends from valley wall to valley wall. Thus, no structures within the valley can be located outside of the floodplain. This is a very popular recreational site, with one of the park's few campgrounds. The area also is a cultural landscape and several of the ranch structures are on the National Register of Historic Places. Moving the facilities would adversely affect these structures and recreational opportunities provided on Santa Cruz Island. In addition, moving the developments out of the valley to another site is not practicable — there are no level sites relatively close to the beach that visitors could easily hike to or that could support the functions provided by the existing developments.

Investigation of Alternative Sites

No alternatives considered in the plan would remove the historic ranch structures and the campground from the floodplain. However, two new locations were considered and rejected for the campground. One site was a slightly elevated area farther up the valley on the southern side. While providing some additional protection from flooding, this site doubled the distance visitors would have to walk and haul camping gear from the water. The site is smaller than the existing campgrounds, requiring a reduced number of sites, and is much steeper than the existing site, requiring design and manipulation to accommodate campsites. Finally, the site is less desirable because it has no shade or screening between campsites. The existing housing/maintenance area overlooks a second potential site up a side canyon to the north. This site is also smaller than the existing campground, requiring a reduced number of sites, and the site is much steeper than the existing campground, requiring design and manipulation to accommodate sites. In addition, this site is exposed with no shade or screening between campsites. Finally, the site has historic check dams and water structures that would be impacted by construction of a campground.

DESCRIPTION OF SITE-SPECIFIC FLOOD RISK

As noted above, the geology of the Scorpion Creek watershed is unstable and naturally prone to flood, mud, and debris flows, and mass failure. Extensive grazing by domestic animals has almost certainly accelerated the rates of erosion and caused more sedimentation and flooding than historical norms. Small to medium-sized slumps are found extensively in the watershed. Many of these mass failures are contributing sediment to the main channel and rapid aggradation of the channel occurs during every flood event (NPS 2003). Flooding has occurred historically and was handled by former occupants of the site by bulldozing the channel. In recent years, the Park Service has also excavated the channel to restore some flow capacity to the channel following flood events.

Scorpion Creek has probably flooded repeatedly over the past century. In 1997, a large flood caused substantial damage in the area. High water overflowed the streambanks and into the area occupied by the historic ranch house and other buildings. Also, a small channel draining an adjacent hillslope flooded and eroded a gully. Sediments eroded out of the enlarged gully deposited around the historic masonry structure. A detailed discussion of this event can be found in NPS 1998.

The reason for frequent flooding in the ranch complex is the limited capacity of the Scorpion Creek channel, even in its excavated state, and the flat topography of the overbank area between the channel and the buildings. Based on a flood hazard assessment (NPS 2003), the 100-year flood for Scorpion Creek is expected to span the entire valley width and be about 2 feet deep at the masonry structure. Velocities are predicted to be high over the entire width of flow. When aggradation of the channel and floodplain occurs during a flood, the flood magnitude needed to reach the building complex is much less than the 100-year flood. Given this set of circumstances, it is apparent that any attempt by park staff to maintain this building complex would require periodic channel excavation to rebuild flow capacity following floods. Furthermore, even with channel excavation, it can be expected that floodwaters would continue to periodically cause damage the masonry structure and nearby structures (NPS 2003).

The campground should be considered to be within the 100-year floodplain. Depths of flow of 2 feet or more can be expected during such a flood event with significant flow velocities. However, it should be noted that placement of a low-investment campground in the 100-year floodplain can be in compliance with NPS floodplain management procedures provided that flood risk to humans is managed to an acceptable level. In this case, risk to campers is small because most, if not all, flooding episodes would occur during prolonged wet periods in the winter months when visitation levels are very low.

Scorpion Creek floods usually occur after several days of heavy rains. Thus, there would be ample time to warn people, and the risk of people being trapped or caught in a flood would be very low. Park staff who are positioned at a nearby Ranger Station are available for rapid responses and public contact. If conditions conducive to generating a flood event do occur, visitors and park staff can evacuate to a high ground site, such as the park staff housing area.

FLOOD MITIGATION MEASURES

Several actions that can be taken in the Scorpion Valley to reduce the risk to life or property are incorporated into the selected alternative by reference. The most important action would be to periodically excavate the channel and remove sediments to rebuild streamflow capacity and keep the stream in the active channel away from park facilities. However, even with channel excavation, it can be expected that floodwaters would continue to periodically damage the masonry building and nearby structures (NPS 2003). It is estimated that up to about 2,009 linear feet of the channel would

need to be dredged to varying depths (tapering up to the campground) from the beach side at the start of the rock wall up to the west end of the lower campground. An estimated maximum 8,000 cubic yards of material may need to be removed from the channel. However, based on the minimal deposition of sediments that occurred after heavy rains in 2004–2005, it is likely that significantly less sediment would need to be dredged. The dredged material would be stockpiled on the south side of the stream, above the upper road crossing to the west. Although the stockpile probably would be in the 100-year floodplain, the material would be stored on a temporary basis (a year or less) and then could be periodically moved out of the floodplain to maintain the road to Smugglers Cove.

Because the Scorpion masonry building and other ranch structures would continue to be vulnerable to damage and loss during large floods, even with the above measures, no irreplaceable records, archeological artifacts or museum collections would be placed in the buildings. Signs also would be placed in the masonry building informing visitors and staffs of the flood risk and suggested actions in the event of flooding (e.g., an evacuation route).

Periodic cleanup of sediments following floods may be needed for continued use of the Scorpion Valley campground. In the peak use time (May to October), rangers are usually present and can warn people of storms and possible flooding. Park staff would post warnings on a campground kiosk and identify where to go in the event of flooding. However, from November through April (the most likely time floods would occur) there is a good chance no rangers would be present. Consequently, in the winter the NPS staff would restrict camping permits and limit camping to 10 campsites that are usually safe to camp in, out of flood danger.

SUMMARY

The National Park Service has determined that there is no practicable alternative to maintaining the historic ranch structures and campground within the floodplain of Scorpion Creek. This determination was based on the decision to continue to use Scorpion Valley as a primary visitor use area within the park, with provision for overnight and day use facilities. Although these facilities are within an area subject to flooding, there would be ample time to warn the few people using the area in the winter, and the risk to people being trapped or caught in a flood would be very low. If conditions conducive to a flood event do occur, visitors and park staff can evacuate to a high ground site, such as the park staff housing area. The proposed flood mitigation measures would reduce the risk to life or property, although even with these measures floodwaters would continue to periodically damage the masonry building and nearby structures — leaving facilities in the valley, even with mitigation measures, means that there would continue to be a risk to property and a small risk to human life due to flooding.

SOURCES

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DETERMINATION OF NO IMPAIRMENT

Channel Islands National Park General Management Plan

September 2015

IMPAIRMENT PROHIBITION

The National Park Service (NPS) *Management Policies 2006* require analysis of potential effects to determine if actions would impair park resources. The fundamental purpose of the national park system, established by the Organic Act and reaffirmed by the General Authorities Act, as amended, begins with a mandate to conserve park resources and values. NPS managers must always seek ways to avoid, or to minimize to the greatest degree practicable, adverse impacts to park resources and values. However, the laws do give the National Park Service the management discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of the park, as long as the impact does not constitute impairment of the affected resources and values. Although Congress has given the Park Service the management discretion to allow certain impacts within park, that discretion is limited by the statutory requirement that the Park Service must leave park resources and values unimpaired, unless a particular law directly and specifically provides otherwise.

The prohibited impairment is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of these resources or values (*NPS Management Policies 2006*). Whether an impact meets this definition depends on the particular resources that will be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other past or planned future impacts.

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

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

An impact will be less likely to constitute impairment if it is an unavoidable result of an action necessary to pursue or restore the integrity of park resources or values and it cannot be further mitigated. An impact that may, but will not necessarily, lead to impairment may result from visitor activities; NPS administrative activities; or activities undertaken by concessioners, contractors, and others operating in the park. Impairment may also result from sources or activities outside the park.

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

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

IMPAIRMENT DETERMINATIONS FOR THE SELECTED ALTERNATIVE

Impairment determinations are not necessary for visitor use and experience, wilderness character, and park operations because impairment findings pertain only park resources and values. These impact topics are not generally considered to be park resources or values according to the Organic Act, and cannot be impaired the same way that an action can impair park resources and values. The topics in the Final FIS that are evaluated for impairment include soils, paleontological resources, water quality, floodplain values (Scorpion Valley), wetlands (Scorpion Valley), vegetation, terrestrial plant communities and vegetation, terrestrial and marine wildlife, threatened and endangered species, soundscape, archeological resources, ethnographic resources, and cultural landscapes.

Soils

Soils are an important resource of Channel Islands National Park, helping determine where native vegetative communities occur, and affecting the area's productivity, drainage patterns, erosion, and structural support for facilities such as park trails. Soils generally take thousands of years to develop. Soil degradation can affect plants and wildlife, as well as the visitor experience. To the extent that soils are linked to the hydrology, vegetation, and habitats of the park, they are necessary to fulfill the purposes of the park and are important to maintaining its natural integrity.

Under the selected action some trampling, compaction, and erosion of soils will occur in a few localized areas, primarily due to the construction and use of new administrative and visitor facilities in developed areas (East Anacapa, Scorpion Valley, Prisoners Harbor, Johnson's Lee, and Bechers Bay). Although some soils will be eroded and altered in these localized areas, mitigation measures will be used to ensure that adverse impacts are minimized. In addition, the selected action will also have a beneficial effect on soils due to the closure and rehabilitation of roads on Santa Cruz and Santa Rosa Islands, resulting in less erosion. Overall, the viability and integrity of the park's soils will not be substantially affected by the selected action. Therefore, the selected action will not result in impairment of soils.

Paleontological Resources

One of the purposes of Channel Islands National Park is to protect nationally significant natural and scientific values of the park. Channel Islands National Park contains a prolific paleontological record, with numerous plant and animal fossils that illuminate the past natural history of the California coastal region. Of particular interest are the pygmy mammoth remains and the caliche fossil forests. Protection of the caliche forest is specifically identified as one of the purposes of the park. Thus, paleontological resources are necessary to fulfill the purposes of the park and are part of the park's natural integrity.

The selected action will not affect most of the park's known paleontological resources. Only slight adverse impacts to paleontological resources (none to the caliche fossil forest) in localized areas may occur due to increased backcountry use and possible illegal collecting of fossils. Because the selected action will likely result in only slight, localized impacts, the selected action will not result in impairment of paleontological resources.

Water Quality

Water quality is important for supporting vegetation and terrestrial and marine wildlife in Channel Islands National Park. Although the park has relatively good freshwater and marine water quality in general, any changes to water quality can affect the park's wildlife. Protection of the park's undisturbed tide pools is specifically identified as one of the purposes of the park. Because changes in water quality can affect the park's unique vegetation and wildlife (thus affecting the park's natural, wildlife, marine, ecological, and scientific values), maintaining good water quality is necessary to fulfill the purposes of the park and is important for natural integrity.

The selected action will result in minimal, localized adverse impacts on marine water quality, primarily due to discharges from visitors' boats. The application of mitigation measures will be used to minimize adverse impacts from NPS actions. In addition, there will be beneficial impacts to freshwater quality under the selected action primarily due to closure and revegetation of roads on the islands. These beneficial impacts combined with minimal adverse impacts to water quality expected in localized areas will ensure there is no impairment of the park's water quality.

Floodplain Values (Scorpion Valley)

The Scorpion Valley floodplain on Santa Cruz Island is one of the park's natural resources and is part of the park's natural integrity. One of the purposes of the park is to protect natural values of the park. Thus, protection of the floodplain values of Scorpion Valley is necessary to fulfill the purposes of the park. Although the floodplain values have been altered by past human habitation, these values are slowly recovering under NPS management. However, all of the developments in the valley are in the floodplain and are subject to periodic floods.

Under the selected action some adverse impacts will occur to floodplain values from periodic mechanical removal of sediment from the creek; however, mitigation measures will be used to minimize these impacts. In addition, the selected action will have beneficial impacts due to restoration actions in the estuarine wetland within the floodplain, and a reduction in flood risks due to the removal of some campsites from the floodplain. With these beneficial impacts, and limited adverse impacts to the Scorpion Valley floodplain, the selected action will not result in an impairment of Scorpion Valley's floodplain values.

Wetlands (Scorpion Valley)

The estuarine wetland at the mouth of Scorpion Creek is one of the park's natural resources and is part of the park's natural integrity. This wetland has been affected by various human activities. As with floodplains, protecting this wetland falls under one of the purposes of the park — to protect natural resources. Under the selected action some slight adverse impacts will occur due to dredging operations in the creek; however, mitigation measures will be used to minimize most of these impacts. Moreover, the wetland restoration actions in the selected action will have a beneficial impact on the wetland. With these beneficial impacts, and slight adverse impacts, the selected action will not result in an impairment of the Scorpion Valley's estuarine wetland.

Terrestrial Plant Communities and Vegetation

Channel Islands National Park supports a diverse terrestrial flora including many rare, relict, and endemic species. The park supports one of the best remnants of the Mediterranean ecosystem in North America. Each of the islands in the park supports a unique assemblage of vegetative communities. Nearly 10% of the park plants exist only on these islands. Thus, vegetation is one reason why Channel Islands National Park is significant, and is key to the park's natural integrity. Protecting the vegetation is necessary to fulfill the purposes of the park including protection of natural, ecological, and scientific values.

Although most of the park's vegetation will not be affected by the selected action, there will be both adverse and beneficial impacts in localized areas. Although mitigation measures will be used to minimize adverse impacts, some native vegetation will be lost or substantially altered in localized areas due to increased visitor use and construction of facilities. None of these adverse impacts will affect the overall integrity, distribution, or presence of the park's native plant populations and communities. In addition, the selected action will have a beneficial effect due to actions taken to control nonnative species and the closure and rehabilitation of roads on Santa Rosa and Santa Cruz Islands. Because the selected action will result in some slight adverse impacts in localized areas, and also will have beneficial impacts, no impairment of the park's terrestrial plant communities and vegetation will occur.

Terrestrial and Marine Wildlife

Part of the significance of Channel Islands National Park is due to the wildlife the islands support. A total of 23 terrestrial animal species and subspecies occur only in this park. The park also provides vital nesting and feeding grounds for more than 90% of the seabirds in southern California, some of which are rare and endangered. In addition, the park supports a larger and more varied population of seals and sea lions than any other area in the world that is close to a major human population center. Protection of the park's marine mammals is specifically identified as one of the purposes of the park. But protection of all of the park's wildlife is necessary to fulfill the purposes of the park regarding protection of the nationally significant natural, wildlife, and scientific values of the park; and wildlife is key to maintaining the park's natural integrity.

Most of the park's terrestrial and marine wildlife will not be affected by the selected action. There will be some slight adverse impacts on terrestrial wildlife habitat in localized areas due to the construction of several small visitor and administrative developments and increased numbers of people in backcountry areas. None of these adverse impacts will substantially alter the park's wildlife populations and habitat conditions. In addition, the selected action will have some beneficial impacts on native terrestrial wildlife due to habitat restoration, closure of roads on the islands, and increased

monitoring and research. Thus, the selected action will not result in the impairment of terrestrial and marine wildlife.

Threatened and Endangered Species

As noted above, Channel Islands National Park supports many unique endemic plant and animal species - many are also federally listed as threatened or endangered. Only a few other units in the national park system support more listed species than Channel Islands National Park. Protecting these species fulfills the park's purpose to protect natural, ecological, wildlife, and scientific values, and safeguarding these species is also important to maintaining the park's natural integrity.

NPS initially determined the need to carefully review the possibility that 8 of the 19 federally listed threatened and endangered species in the park might be affected by the plan: island fox, snowy plover, Hoffmann's slender-flowered gilia, Santa Cruz Island chicory, island rush-rose, island barberry, Hoffmann's rock-cress, and Santa Rosa Island manzanita. Upon further analysis it was subsequently determined that no activities are occurring or being proposed under the selected action that will affect these species in the park. None of the actions being proposed in the selected action are expected to measurably affect the distribution, abundance, or reproduction of the species in the park. Moreover, continuing habitat restoration efforts will help protect the species' habitats. Park staff will continue to consult with the USFWS before taking actions on specific sites to ensure potential impacts are avoided or minimized. Thus, the selected action will not result in the impairment of threatened and endangered species in the park.

Soundscape

The natural soundscape is an important resource of Channel Islands National Park. Natural sounds generally predominate throughout the park. Human-generated noise is primarily focused in the developed areas of the park, including East Anacapa, Scorpion Valley, Prisoners Harbor, and Bechers Bay. Protecting the natural soundscape is necessary both to fulfill the purposes of the park and protect the park's natural values; and is important in maintaining the natural integrity of the park. Most of the park's soundscape will not be affected by the selected action. Although some localized minor short-term impacts will occur due to noise from visitor use, new developments, and management actions, they will not appreciably affect the park's soundscape — these adverse impacts will be small in scale and occur only for short times. Thus, the selected action will not result in the impairment of soundscape.

Archeological Resources

Archeological resources can be found on all of the Channel Islands – Santa Rosa, Santa Cruz, San Miguel, Anacapa, and Santa Barbara. Channel Islands also has submerged archeological resources, mostly in the form of shipwrecks. While only approximately 85% of the park has been surveyed, the park has many archeological sites and districts that are listed in or eligible for listing in the National Register of Historic Places, and these resources are important to the history and interpretation of the park. Protecting archeological resources is necessary to both fulfill the purposes of the park and protect the park's cultural values; and is important in maintaining the cultural integrity of the park.

Most of the park's archeological resources will not be impacted by the selected action. Although some localized impacts will occur due to ground disturbance from visitor use, new developments, and management actions, they will not appreciably impact the park's archeological resources. Thus, the selected action will not result in the impairment of archeological resources.

Historic Structures and Buildings

Historic structures and buildings can be found on Santa Rosa and Santa Cruz islands. They date back to Mexican land grants circa 1840 and represent the span of ranching development from that time to the present. Other historic resources on the islands include the Anacapa Island Light Station complex and military sites and structures associated with World War II and the Cold War periods. Currently, 69 structures are listed in the park's List of Classified Structures database. Some of the park's historic structures and buildings will be affected by the selected action since rehabilitation of historic structures and buildings at Scorpion and Smugglers ranches, Prisoners Harbor, and Bechers Bay, will be undertaken. While some localized impacts will occur due to the rehabilitation work in the selected action, the activities will not appreciably impact the park's historic structures and buildings because the work will be done in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (1995). Thus, the selected action will not result in the impairment of historic structures and buildings.

Cultural Landscapes

The NPS Cultural Landscape Inventory database identifies three national register eligible or listed cultural landscapes at Channel Islands, one of which has three component landscapes: Santa Cruz Island Ranching District (Smugglers Cove Ranch, Caire-Gherini Ranch Historic District, and Rancho Del Norte), Santa Rosa Island Ranching District, and Anacapa Island Light Station. These cultural landscapes are important to the history and interpretation of the park. Protecting cultural landscapes is necessary both to fulfill the purposes of the park and protect the park's cultural values; and is important in maintaining the cultural integrity of the park. Few of the park's cultural landscapes will be impacted by the selected action. Although some impacts will occur due to new development and vegetation removal, they will not appreciably impact the park's cultural landscapes because the work will be done in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes*. Thus, the selected action will not result in impairment of cultural landscapes.

Ethnographic Resources

The earliest inhabitants of the northern Channel Islands arrived some 13,000 years ago. The Chumash occupied the islands until about 1810, when the remaining island populations were removed to the mainland missions. Ethnographic resources associated with the Chumash can be found on several of the islands. These ethnographic resources are important to the history and interpretation of the park. Protecting ethnographic resources is necessary both to fulfill the purposes of the park and protect the park's cultural values; and is important in maintaining the cultural integrity of the park. Most of the park's ethnographic resources will not be impacted by the selected action. Although some localized impacts will occur due to increased visitor use on the islands and new developments, they will not appreciably impact the park's ethnographic resources. Thus, the selected action will not result in the impairment of ethnographic resources.

SUMMARY

As described above, adverse impacts anticipated as a result of implementing the selected action on a resource or values whose conservation is necessary to fulfill specific purposes identified in the park's establishing legislation, key to natural or cultural integrity of the park or to opportunities for enjoyment of the park, or identified as significant other relevant NPS planning documents, will not rise to levels that would constitute impairment.