



United States Department of the Interior

NATIONAL PARK SERVICE  
PACIFIC WEST REGION  
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San Francisco, CA 94104-2828



IN REPLY REFER TO:

L7617 (PWRO-P)

FEB 20 2018

Memorandum

To: Superintendent, San Juan Island National Historical Park

From: Regional Director, Pacific West

Subject: Environmental Compliance for Replacement of the  
American Camp Temporary Visitor Center

The finalized *Finding of No Significant Impact* (FONSI) and supplementary *Statement of Findings for Wetlands* for facility improvements and the enhancement of visitor services are approved.

To complete this particular compliance effort, at the time when the park announces approval of the project, the FONSI should be made available to all recipients of the environmental assessment.

Congratulations to you and the park staff involved in completing this important step forward in fulfilling the vision of the 2008 General Management Plan.

Stan Austin

Attachments: (2)



## REPLACE AMERICAN CAMP TEMPORARY VISITOR CENTER ENVIRONMENTAL ASSESSMENT

### FINDING OF NO SIGNIFICANT IMPACT

February 2019

This Finding of No Significant Impact (FONSI) documents the decision of the National Park Service (NPS) to adopt the proposed action in the Replace American Camp Temporary Visitor Center Environmental Assessment (EA), which is Alternative 2: Replace American Camp Visitor Center. This alternative was evaluated against Alternative 1: No Action (Continue Current Management). The two alternatives were described and analyzed in the EA. This FONSI documents the NPS determination that no significant impacts on the quality of the human environment will occur from implementation of this course of action.

#### Purpose and Need

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

Project objectives include:

- Design visitor facilities to reflect their cultural and environmental setting and to effectively convey park information even when the visitor center is not staffed
- Construct a more efficient, code compliant, and sustainable visitor center
- Enhance public health and safety
- Update and expand interpretive exhibits
- Construct an outdoor interpretation plaza and demonstration area

- Accommodate existing and projected use levels on site
- Provide full accessibility for programs and facilities
- Incorporate energy-saving technologies and materials
- Accommodate office and storage space within the visitor center
- Improve safety and clarity of the entrance road/Cattle Point Road intersection and access route
- Separate visitor access route from the park operations area
- Increase administrative camping for Volunteers In Parks (VIPs), other volunteers, seasonal staff, or conservation work groups
- Minimize adverse effects on historic properties
- Minimize the removal of large mature trees

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

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

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

## Description of the Selected Action

The NPS has selected Alternative 2: *Replace American Camp Visitor Center* for implementation. Under the selected action, the existing trailer would be removed and a new building would be constructed. The new building would cover portions of the existing footprint and extend to the north beyond the footprint. Traffic and pedestrian flows would be reconfigured, along with parking layouts. A new entrance road would be constructed.

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

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

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

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

The existing administrative area would be redesigned and reconfigured to be used for maintenance and other park purposes. Specific designs have not been created; however, conceptual ideas highlight the potential for constructing new structures (approximately 800 to 1,000 square-feet each) to provide covered storage for maintenance equipment,

climate controlled storage for living history materials and resource management supplies and equipment, and to provide space for volunteer laundry. One of the existing buildings would be renovated to provide work spaces for resource stewardship and support fieldwork operations. There would be adequate parking provided for work vehicles, as well as, necessary outdoor lighting for safety. The two existing administrative campsites would be removed, and up to six new administrative campsites with hook-ups (power, telecommunications, and septic) would be constructed, along with a new septic.

Implementation of the actions covered in this document have the potential to require the removal of approximately 48 trees measuring greater than 8 inches in diameter in the vicinity of the new visitor center, parking lot, entrance road, and administrative area. Following construction, all disturbed areas would be revegetated using native plant species. Revegetation would begin as soon as possible after completion of construction, during the optimum time of year to ensure greatest plant survival.

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

## **Other Alternatives Evaluated**

### *Alternative 1: No Action*

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

## **Preliminary Alternatives and Actions Considered But Dismissed**

### *Visitor Center Location*

The NPS initially considered three sites for the location of the new American Camp visitor center. During an internal scoping session in January 2017, park staff concluded that the existing visitor center location was the most practical and advantageous site. The other locations were dismissed because they would affect undeveloped areas and

thus would have much greater environmental and cultural resource impacts and would be prohibitively expensive.

### *Entrance Road Realignment*

The NPS considered five entrance road alignments. All of the five alignments begin in roughly the same location in order to maximize safety for the travelling public (the entrance location maximizes the sight distance for drivers turning onto Cattle Point Road and so travelers on Cattle Point Road can see vehicles entering the roadway). All of these alignment options resulted in fewer benefits or greater adverse impacts than the alignment included in the analysis as part of Alternative 2.

## **Decision Reached and Rationale**

The NPS selected Alternative 2, Replace American Camp Visitor Center, because it best meets the purpose and need of the project. The selected action replaces an antiquated trailer with significant public health and safety risks with a new facility that, in addition to providing a safe and accessible environment for the public and park employees, enhances the visitor experience and understanding of the cultural and natural setting of American Camp and its regional context. It provides additional park operational facilities that support park operations, a much needed improvement over the current concentrated use of a very small and congested administrative site. It also improves the safety of the entrance road and the visitor arrival experience by increasing the sight distance before the entrance road turnoff, and by addressing the confusion over where to turn to access the visitor center. Compared to other alternatives considered but dismissed, the selected action will provide the greatest benefit and the smallest adverse impacts.

## **Mitigation Measures**

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

### *Archeological Resources*

A Monitoring and Inadvertent Discovery Plan will be developed for this project. Construction activities that could result in ground disturbance would be monitored for undetected archeological resources. If previously undetected archeological resources

are encountered during construction, work would stop in that location until the site is evaluated by a qualified archeologist. In the unlikely event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act (25 USC 3001) of 1990 would be followed. If non-Indian human remains were discovered, standard reporting procedures to the proper authorities would be followed, as would all applicable federal, state and local laws.

### *Cultural Landscape*

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

### *Bald Eagles*

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

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

### *Migratory Birds*

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

### *Vegetation*

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

### *Wetlands*

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

### *Visitor Use and Experience*

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



## Why the Selected Action Will Not Have a Significant Effect

After considering the environmental consequences described in the EA, the NPS has determined that the selected alternative and its associated actions will not have a significant effect on the quality of the human environment considering the context and intensity of impacts (40 CFR 1508.27). Thus, an environmental impact statement will not be prepared. This finding is based on the following:

1. Significant effects even though the overall effect is beneficial: No major adverse impacts were identified that will require analysis in an EIS; the finding of no significant environmental impacts is not biased by the beneficial effects of the action.
2. Effects on public health and safety: The selected action will not adversely affect public health or safety.
3. Unique characteristics of the area: The selected action will not result in significant effects on the unique natural or cultural resource characteristics of the area, including cultural resources and wetlands.
  - Although the outer portions of three archeological sites will be minimally disturbed by construction, the disturbance will not have an adverse effect on archeological resources because there will be a negligible, if any, loss of archeological materials or reduction of contextual evidence associated with the sites.
  - Although the selected action will require the removal of approximately 28 trees within the remnant forest (a cultural landscape characteristic), the overall density and scale of the remnant forest will be little changed; thus the vegetation feature will retain the look and feel of forest and will be largely unnoticeable.
  - Although the selected road alignment will impact wetlands, the impact will be limited to wetlands with low functional value (0.07 acres), and a number of mitigation measures will be used to minimize impacts. A Wetlands Statement of Findings was prepared to document compliance with NPS policies and procedures on wetland protection. The NPS is seeking funding for revegetation and wetland enhancement that will improve the current condition of the wetland.
4. Highly controversial impacts: There are no controversial impacts or aspects of the proposed project that surfaced during the environmental analysis process.
5. Highly uncertain or unique or unknown risks: There were no highly uncertain, unique, or unknown risks identified during preparation or public review of the EA.

6. Future precedents: The selected action neither establishes an NPS precedent for future actions with significant effects, nor represents a decision in principle about a future consideration.
7. Significant cumulative impacts: No significant cumulative effects were identified during preparation of the EA or during the public review period.
8. National Register of Historic Places or other significant scientific, archeological, or cultural resources: The selected action will have *no adverse effect* on historic properties. Mitigation measures cited in the EA will prevent loss or destruction of significant scientific, cultural, and historical resources. The outer portions of three archeological sites will be minimally disturbed by construction, but the disturbance will not have an adverse effect on the National Register eligibility of the sites because there will be a negligible, if any, loss of archeological materials or reduction of contextual evidence associated with the sites.
9. Endangered or threatened species or habitat: Although the bald eagle (*Haliaeetus leucocephalus*) is no longer federally listed, it is still protected under the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act. A bald eagle nest site in close proximity to the visitor center could be disturbed during project implementation, therefore, the NPS will apply for a non-purposeful take permit from the USFWS to ensure appropriate compliance has been completed, should take occur. The island marble butterfly (*Euchloe ausonides insulanus*) is a candidate for listing as endangered under the Endangered Species Act. Although the project area is located within and adjacent to island marble butterfly proposed critical habitat, the NPS determined that there will be no foreseeable impacts on the population within the current project area as there have been no island marble butterfly detections or host plants identified. The US Fish and Wildlife Service concurred with the NPS' determinations.
10. Other legal requirements: The selected action will not violate federal, state, or local laws or requirements for the protection of the environment.

## Public Involvement

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

was overall support for the project, but there were concerns over impacts to wetlands and bald eagles.

The EA was released for public review and comment on November 8, 2018, and comments were accepted through December 8, 2018. A press release was published in the local newspaper and sent out to the park's distribution list of interested citizens, traditionally associated tribes and groups, and agencies. Two public open houses were held at American Camp on November 20 and December 4, 2018. A total of six people attended the open houses, where a public information officer was available to answer questions and display maps and plans of the project. There was general support for the new visitor center, however, two individuals were not in support of the road realignment due to environmental and safety concerns. Attendees were encouraged to submit comments on-line via the NPS Planning, Environment, and Public Comment (PEPC) website (<http://parkplanning.nps.gov>).

The park received six comments from individuals, all via the PEPC website, plus one letter received via US mail which was a duplicate of a PEPC comment. The comments were reviewed and analyzed to identify substantive concerns. Concern statements were developed from the comments and are provided with NPS responses to substantive comments, along with a summary of all comments received, in Attachment C. There was general support for the new visitor center; however, several commenters were not in support of the new road due to natural resource impacts and safety concerns.

## **Tribal and Agency Consultation**

### *Traditionally Associated Native American Tribes and Groups*

On March 15, 2017, consultation was initiated by letter with fourteen American Indian Tribes and Canadian First Nations traditionally associated with the lands of San Juan Island National Historical Park, in accordance with 36 CFR 800.3. The NPS requested assistance with the identification of any properties of religious and cultural significance, resources, practices or traditions that could be adversely affected by construction of the proposed visitor center and its associated development within the proposed area of potential effects. One tribe, the Skokomish Indian Tribe, a federally recognized American Indian tribe, responded via correspondence dated May 8, 2017, that they had no comment.

On October 17 and 18, 2017, the NPS held an in-person meeting for traditionally associated American Indian Tribes and Canadian First Nations to participate in an exhibit design kick-off workshop in Friday Harbor, Washington to develop interpretive

content for the new visitor center. Representatives from two federally recognized tribes, Tulalip Tribes of Washington and Lummi Indian Nation, attended the workshop.

On November 14, 2018, the NPS held an in-person meeting with representatives from the Lummi Nation in Friday Harbor, Washington, to discuss the project and to disseminate draft content for schematic design. Consultation with traditionally associated tribes and groups involving content for exhibit design is ongoing with additional meetings planned for early 2019.

On November 15, 2018, the NPS transmitted the EA to traditionally associated tribes and groups of San Juan Island National Historical Park through official email correspondence for review and comment on the PEPC website. No comments or concerns on the proposed undertaking were identified.

On December 21, 2018, the NPS transmitted via official email correspondence the park's assessment of effect for the proposed undertaking as well as the park's finding of no adverse effect for 30-day review in accordance with 36 CFR 800.5(c). The final archeological report with results of an archeological survey and testing conducted in support of the project was also transmitted with the park's assessment of effect. No comments or concerns from traditionally associated tribes and groups regarding the park's assessment of effect were identified.

#### *Washington Department of Archaeology and Historic Preservation*

On March 15, 2017 consultations were initiated by letter with the office of the State Historic Preservation Officer (SHPO), in accordance with 36 CFR 800.3. The NPS requested assistance with the identification of any historic properties that could be affected by construction of the proposed visitor center and its associated development and requested affirmation of the proposed area of potential effects. By letter dated March 20, 2017 the SHPO concurred with the area of potential effects.

The NPS sent a letter to the SHPO on December 20, 2018 proposing a finding of no adverse effect, in accordance with 36 CFR 800.5(c). By letter dated January 2, 2019, the SHPO concurred with the finding.

#### *United States Army Corps of Engineers*

Under Section 404 of the Clean Water Act (33 USC 1344), permit approval is required for projects that may result in the discharge of dredged or fill material into waters of the U.S. The NPS will continue to work with the USACE, however it is not anticipated at this time that a Section 404 permit will be required given the wetland may not fall under the jurisdiction of USACE based on the 2015 Clean Water Rule.

### *United States Fish and Wildlife Service*

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


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

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

## Finding

On the basis of the information contained in the EA as summarized above, the NPS has determined that implementing the selected action is not a major federal action nor is it an action without precedent or similar to an action that normally requires an Environmental Impact Statement (EIS). The conclusion that impacts resulting from implementing the selected action will not have a significant effect on the human environment is supported by the analysis completed in the EA, the capability of the mitigation measures to reduce, avoid, or eliminate impacts, and the consideration of agency and public comments. Therefore, in compliance with the National Environmental Policy Act, an EIS will not be prepared, and the plan may be implemented immediately.

## Recommended:



Superintendent  
San Juan Island National Historical Park

Date 2/12/19

## Approved:



Regional Director  
Pacific West Region

2/19/19  
Date

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# REPLACE AMERICAN CAMP TEMPORARY VISITOR CENTER ENVIRONMENTAL ASSESSMENT

## FINDING OF NO SIGNIFICANT IMPACT

### Errata

1. There are three archeological sites in the APE considered potentially eligible for listing in the NRHP, the outer portions of which would be minimally disturbed by construction. On page 18, under Impacts of Alternative 2, Archeological Resources, it says “There are five archeological sites in the APE considered potentially eligible for listing in the NRHP. Four sites would remain unaffected by the proposed action”. On pages 19 and 20, the last paragraphs on each page refer to two sites rather than three. These sentences should read as follows:

Page 18: There are **eight** archeological sites in the APE considered potentially eligible for listing in the NRHP. **Five** sites would remain unaffected by the proposed action. The outer portions of **three** sites would be minimally disturbed by construction.

Page 19: The loss of portions of **three** sites would not impact our understanding of ancient and recent human past as recent testing resulted in minimal findings and a recommendation that the sites are not contributing elements to the American Camp Historic District.

Page 20: Under Alternative 2, the outer edges of **three** archeological sites would be minimally disturbed, but it would not adversely affect the National Register eligibility of the sites.

2. On page 25, under the Conclusion statement for Vegetation, it reads: “Under Alternative 2, a total of 6 acres, including 48 mature trees, would be removed for the project.” This sentence should read: “Under Alternative 2, a total of **3** acres, including 48 mature trees, would be removed for the project.”



# REPLACE AMERICAN CAMP TEMPORARY VISITOR CENTER ENVIRONMENTAL ASSESSMENT

## FINDING OF NO SIGNIFICANT IMPACT

### Public Comment Summary and Responses to Substantive Comments

This report summarizes public comments submitted on the *Replace American Camp Temporary Visitor Center Environmental Assessment*. The EA was released for public review on November 8, 2018 and the NPS accepted comments through December 8, 2018. Public comments were received online through the Planning, Environment, and Public Comment (PEPC) website and through the mail. During the comment period, six public comment letters were received with a total of nine unique concerns. This report provides a summary of public concerns expressed in those comment letters as well as responses to substantive comments.

NPS staff reviewed and analyzed public comment letters that were received during the comment period. Each letter was read to determine discrete points expressed by the author, each of which is considered to be a unique concern. The comments were then screened to determine whether or not further clarification was needed, or whether modification of the proposed action was necessary. Responses to concern statements that are considered substantive were prepared. There were three public comments received in response to the EA that were considered substantive. Substantive comments are those that:

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

### Summary of Comments

#### *Alternatives*

One commenter who was opposed to moving the access road provided an alternative solution to address the confusion that exists between the park entrance and Eagle Cove Drive. The solution includes a) moving the American Camp sign to the east of the current access road; b) widening the access road and painting shoulder and centerlines

to make it look more official; c) adding an Eagle Cove Drive sign near the vacated American Camp sign; and d) reducing the size of the berm near the entrance road to make it more visible. Additionally, another commenter suggested adding a turn lane for the visitor center.

### ***General Comments***

One commenter mistakenly thought that the project was located at San Juan National Historic Site in Puerto Rico, requesting that traditional flowers be planted around the building site.

### ***Interpretation of History and Cultural Resources***

One commenter provided an assortment of ideas related to interpretation of history and cultural resources. Suggestions include exhibits with artifacts, reproductions, and reconstructions of human history; a broader time range of exhibits; and living history demonstrations and hands-on exhibits. The commenter also suggested that electronic gadgetry be minimized but the use of QR codes next to displays could be used to allow people to get more information on their phones.

### ***Visitor Safety***

One commenter argued that the proposed entrance road location is less safe than the current location because the current position on the outside of a curve allows the longest sight lines in each direction on Cattle Point Road, while the new location reduces sight distance for cars travelling south on Cattle Point Road.

### ***Natural Resources Impacts***

Three commenters expressed concern over impacts to natural resources, including wetland disturbance, tree removal, and bald eagle disturbance. One of the commenters opposed the entire project, while the other two were in support of the visitor center improvements yet opposed to the road improvements. The impacts of development being closer to the eagle nest, altering the wetlands and creating more paved area, and the removal of large trees were the primary concerns.

## **Responses to Substantive Comments**

1. Concern Statement: The proposed action would be detrimental to wildlife and the ecosystem, including the removal of trees and effects on bald eagles and wetlands.

Response: The NPS appreciates these concerns, however, the impacts to vegetation (pages 24-25), bald eagles (pages 21-23), and wetlands (pages 26-27) were fully analyzed in the EA, and with proper mitigation measures, should be minimized.

Vegetation. Although the removal of 48 trees would be permanent, none of the vegetation is considered rare, and this degree of removal would not impact ecosystem-scale vegetation processes. With mitigation measures in place, impacts from invasive weeds would be minimized and felled trees would be retained for beneficial use.

Bald Eagles. The potential to disturb eagles, including possible nest failure due to construction activities, is possible. Mitigation measures would be implemented to reduce the likelihood of nest failure; however, should eagles be disturbed and possible nest failure occur, the NPS will apply for a non-purposeful take permit from the USFWS to ensure appropriate compliance has been completed. This impact is not expected to affect the trends and status of the larger island bald eagle population.

Wetlands. Approximately 0.07 acres of wetlands would be impacted by the road relocation. Impacts would be minimized by applying numerous mitigation measures during design and implementation, resulting in negligible effects on wetland values and characteristics. The wetlands are in poor to fair condition due to continuing cumulative impacts from legacy land use, altered drainage patterns, roads and non-native grasses. The NPS is seeking funding for revegetation and wetland enhancement that will improve the current condition of the wetland.

2. Concern Statement: NPS should consider an alternative to adjust the existing park entrance, relocate the sign to better define the entrance, and add a turn lane.

Response: These alternative options were not considered because they would not meet the following project objectives:

- To separate the visitor access route from the park operations area, and
- To increase administrative camping for Volunteers In Parks (VIPs), other volunteers, seasonal staff, or conservation work groups

Furthermore, relocated signing, additional or changed striping, and reducing the berm may benefit the safety of the intersection, but does not eliminate the confusion, increase stopping sight distance, or reduce the potential for conflict. According to Federal Highway Administration standards, there is not enough traffic to warrant a turn lane.

3. Concern Statement: Moving the entrance road further north would not minimize hazardous road conditions.

Response: By relocating the entrance to the new site, driver confusion is reduced and sight distance increased. According to the American Association of State Highway and Transportation Officials (AASHTO) “A policy on Geometric Design of Highways and Streets”, the recommended stopping sight distance (i.e. distance desired to stop in preparation for a turn), based on a 30 mile per hour speed, is 335’. At the new intersection location, the design provides for 325’ for a right turn and 375’ for a left turn stopping sight. These figures represent an increase when compared to the existing conditions, which are 225’ and 250’, respectively.

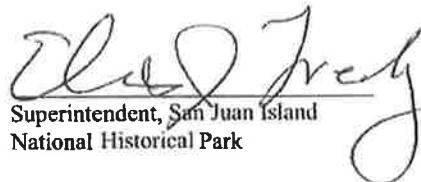
**STATEMENT OF FINDINGS FOR  
EXECUTIVE ORDER 11990 (PROTECTION OF WETLANDS)**

**Replace American Camp Visitor Center**

**San Juan Island National Historical Park**

**San Juan County, Washington**

*Recommended:*

  
Superintendent, San Juan Island  
National Historical Park

12/20/18  
Date

*Certification of  
Technical Adequacy  
And Servicewide Consistency:*

  
Chief, Water Resources Division

1/28/2019  
Date

*Approved:*

  
Regional Director,  
Pacific West Region

2/19/19  
Date

## INTRODUCTION

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

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

## PROPOSED ACTION

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

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



Figure 1: Preferred Alternative Site Plan

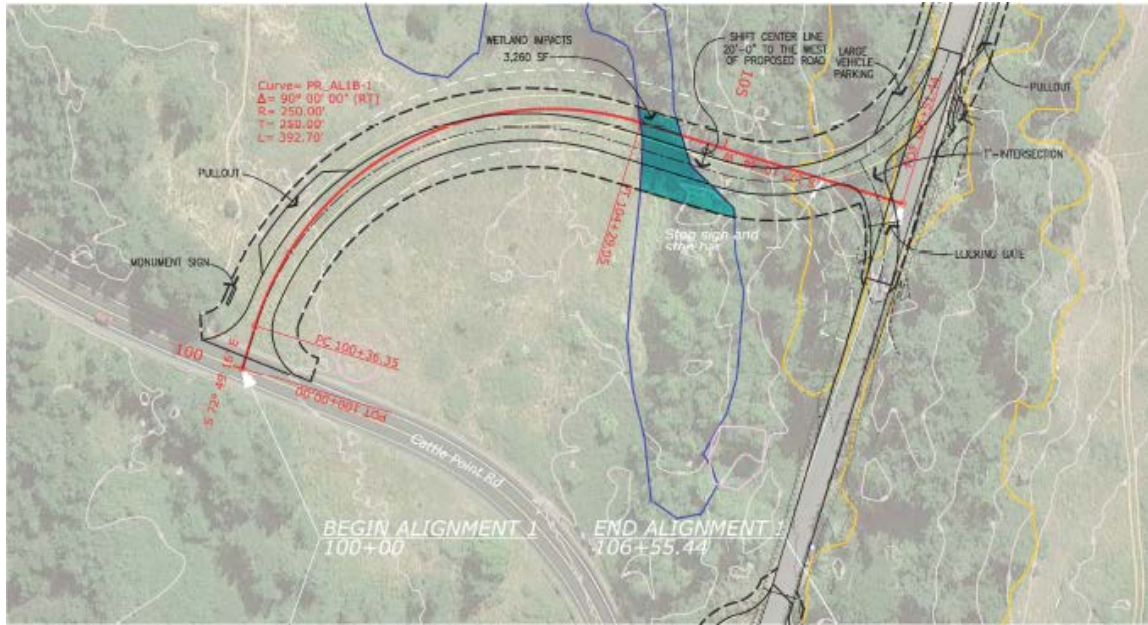


Figure 2: Preferred Entrance Road Alignment



## PROJECT AREA

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

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

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

## WETLANDS AND FUNCTIONS

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

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

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

patchiness and vertical structure complexity. Category III wetlands tend to be less diverse or more isolated from other aquatic ecosystems.



### Figure 3: Wetlands

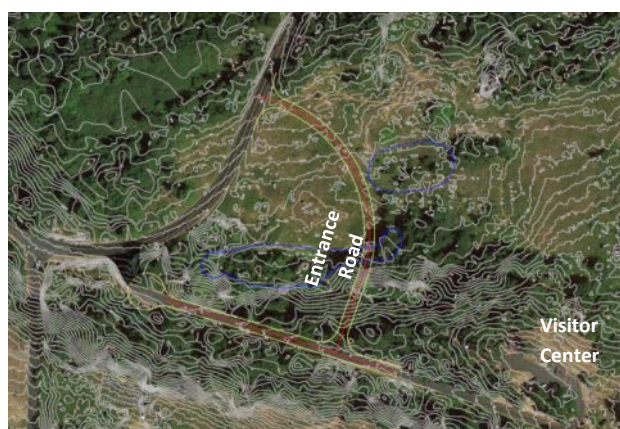
## INVESTIGATION OF ALTERNATIVES

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

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



Alignment 2



Alignment 3



Alignment 4



Alignment 5



## IMPACTS TO WETLANDS IN THE PROJECT AREA

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

**Table 1: Wetland Impacts by Alternative**

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

## MITIGATION MEASURES

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

## CONCLUSIONS

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

## REFERENCES

- Cowardin et. al. 1979. *Classification of Wetlands and Deepwater Habitats of the United States*. U.S. Fish and Wildlife Service. Publication FWS/OBS-79/31. U.S. Government Printing Office, Washington, D.C. December.
- Hruby, T. 2014. *Washington State Wetland Rating System for Western Washington: 2014 Update*. Publication #14-06-029. Olympia, WA. Washington Department of Ecology.
- National Park Service (NPS). 2002. *Director's Order #77-1: Wetland Protection*. Re-issued in October. National Park Service (NPS). 2016. *Procedural Manual #77-1: Wetland Protection*. Re-issued in June.
- National Park Service (NPS). 2017. *American Camp Visitor Center, Development Concept Planning Project, Delineation of Wetlands*. August.
- U.S. Army Corps of Engineers (USACE). 1987. *Corps of Engineers Wetlands Delineation Manual*. Technical Report 4-87-11987. U.S. Army Corps of Engineers (USACE).
- USACE. 2010. *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys and Coast Region*. J. S. Wakeley, R. W. Lichvar, and C. V. Noble, eds. Army Engineer Research and Development Center, U.S. Army Corps of Engineers (USACE).



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# REPLACE AMERICAN CAMP TEMPORARY VISITOR CENTER ENVIRONMENTAL ASSESSMENT

## NO IMPAIRMENT DETERMINATION

### Introduction

The National Park Service (*NPS Management Policies 2006*) requires analysis of potential effects to determine whether the selected alternative would impair a park's resources and values. 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 on park resources and values. However, the laws do give the NPS the management discretion to allow impacts on park resources and values when necessary and appropriate to fulfill the purposes of the park. That discretion is limited by the statutory requirement that the NPS must leave 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 those resources or values (*NPS Management Policies 2006*). Whether an impact meets this definition depends on the particular resources that would be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impacts; and the cumulative effects of the impact in question and other impacts.

An impact on any park resource or value may, but does not necessarily, constitute impairment. An impact would be more likely to constitute 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, or
- key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
- identified as a goal in the park's general management plan or other relevant NPS planning documents as being of significance.

An impact would be less likely to constitute impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated. 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 non-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 Action**

Impairment findings relate directly to park resources and values; the Organic Act does not consider visitor use and experience to be a park resource or value subject to the non-impairment requirement, so it has been dismissed from impairment review. Resources and values that were considered but dismissed from further analysis in the EA because they would not be affected by the proposed action include the island marble butterfly, environmental justice, and Indian trust resources. Accordingly, those resources will not be impaired by implementing the selected action. The topics evaluated in the EA that are subject to impairment review include historic properties, bald eagles, vegetation, and wetlands.

### *Historic Properties*

The outer edges of three archeological sites will be minimally disturbed, but this will not adversely affect the National Register eligibility of the sites. The cultural landscape will be impacted by the modification of the mature forest remnants around the visitor center; however, the feature will still retain the look and feel of forest and will be largely unnoticeable. The temporary relocation of the American Camp monument is not expected to affect the monument's status on the List of Classified Structures. The selected action will not result in impairment to historic properties because mitigation measures will be followed to protect known archeological sites, and monitoring will take place during ground disturbing activities to prevent damage to previously undetected archeological resources. Facilities and the realigned entrance road will be designed and constructed to avoid or minimize adverse effects on the cultural landscape.

### *Bald Eagles*

The potential to disturb bald eagles, including possible nest failure due to construction activities, is possible. Mitigation measures will be implemented to reduce the likelihood of nest failure; however,

No Impairment Determination - Replace American Camp Temporary Visitor Center Environmental Assessment

should eagles be disturbed and possible nest failure occur, this impact is not expected to effect the trends and status of the larger island bald eagle population. Therefore, the selected action will not result in impairment to bald eagles.

#### *Vegetation*

Approximately 3 acres of forest and prairie vegetation would be removed for this project, including approximately 48 trees larger than 8 inches in diameter. The visitor center site and entrance road were sited to minimize the removal of larger trees, and the additional administrative campsites and septic system would be designed to be built without removing trees; however, there could be disturbance to other vegetation.

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

#### *Wetlands*

The new road alignment would bisect two adjacent wetlands, impacting approximately 0.07 acres total, or 3,260 square feet of the wetlands. In order to minimize the extent of disturbance to wetlands, a number of mitigation measures would be implemented. Overall impacts to wetland functions would be negligible; road construction would impact a very small portion of the existing wetlands, which are in relatively fair to poor condition due to past land use. The incremental loss of wetland habitat would have negligible effect on overall wildlife habitat. With proper mitigation measures in place, the impacts to wetlands would be at a level that would not have noticeable effects on wetland values or characteristics; therefore, the selected action will not result in impairment to wetlands.

## **Conclusion**

As described above, adverse effects and environmental impacts anticipated as a result of implementing the selected action on 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 or to opportunities for enjoyment of the park, or identified as significant in the park's general management plan or other relevant NPS planning documents, will not rise to levels that will constitute impairment of park resources and values.





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# ASSESSMENT OF ACTIONS HAVING AN EFFECT ON HISTORIC PROPERTIES

## A. DESCRIPTION OF UNDERTAKING

1. **Park:** San Juan Island National Historical Park

### 2. **Project Description:**

**Project Name:** Replace Temporary American Camp Visitor Center with New Permanent Building

**Prepared by:** Jeremy Ripin    **Date Prepared:** 03/31/2017    **Telephone:** 360-378-2240

**PEPC Project Number:** 58302

#### **Locations:**

County, State: San Juan, WA

#### **Describe project:**

##### **Introduction:**

The National Park Service (NPS) is proposing to improve the facilities at the American Camp visitor center site within San Juan Island National Historical Park. The purpose of this project would be to replace the antiquated trailer with new facilities that would greatly enhance public health and safety, as well as, the visitor experience and understanding of the cultural and natural setting of American Camp and its regional context, to provide updated park operational facilities, and to improve the safety of the entrance road and enhance the visitor arrival experience.

##### **National Environmental Policy Act (NEPA):**

An environmental assessment (EA) has been prepared in accordance with NEPA and its implementing regulations (40 CFR 1500-1508) and NPS Director's Order 12: Conservation Planning, Environmental Impact Analysis, and Decision-making, to assess the alternatives and their impacts on the environment. The EA examines two alternatives: a no-action alternative (Alternative 1), and the proposed action (Alternative 2) to improve the facilities at the American Camp visitor center site. As Alternative 2 has the potential to impact wetlands, in accordance with NPS policy and Director's Order 77-1: Wetland Protection, a draft Wetland Statement of Findings was prepared.

##### **National Historic Preservation Act (NHPA):**

The NPS followed the standard Section 106 process as outlined in the NHPA and its implementing regulations (36 CFR 800.3-800.13). The NPS initiated consultation with the State Historic Preservation Officer (SHPO) and traditionally associated tribes and groups in March 2017. The NPS applied the criteria of adverse effect [(per 36 CFR §800.5(1))] and determined that the undertaking will not directly or indirectly alter any of the characteristics that qualified the properties for listing on the National Register of Historic Places in a way that would diminish their integrity. The SHPO concurred with a finding of no adverse effects in January 2019. Traditionally associated tribes and groups did not issue any comments in regards to the finding.

##### **Selected Action:**

The NPS has chosen to adopt the proposed action in the Replace American Camp Temporary Visitor Center EA, which is Alternative 2: Replace American Camp Visitor Center. The NPS has made the determination that no

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significant impacts on the quality of the human environment will occur from implementation of this course of action. A Finding of No Significant Impacts (FONSI) has been completed and was approved by the Pacific West Regional Director on February 19, 2019.

**Timeline of NEPA/NHPA Milestones:**

Internal Scoping and Alternative Development: May 4, July 12 - 13, and July 27, 2017

Section 106 Initiated: March 15, 2017

Public Release of EA: November 8, 2018

Public Comment Period: November 8 through December 8, 2018

Public Open Houses to Discuss Proposed Action: November 20 and December 4, 2018

Analyses of Public Comments: November 16 and December 12, 2018

Section 106 Finding of No Adverse Effects: December 20, 2018

Section 106 SHPO Concurs with Finding of No Adverse Effects: January 2, 2019

FONSI: Superintendent Recommended February 12, 2019; Regional Director Approved: February 19, 2019

**Area of potential effects (as defined in 36 CFR 800.16[d])**

The APE for this project was developed with the project specifications in mind, and is based on areas that may be subjected to ground disturbance and the anticipated indirect effects, including viewshed, for the new visitor center (see map). The APE encompasses the current temporary visitor center, parking lot, forest stand south of approach road (which includes a small cabin known as "Fire Cache," and VIP recreational vehicle pads), and extends to the north into grasslands, from the west side of Cattle Point Road, east to the forest tree line.

The APE is approximately 440 m (984.3 ft.) long on a west/east axis, and 330 m (1,082.7 ft.) wide on a north/south axis. The APE encompasses an area roughly 9.4 ha (23 ac.). It is anticipated that not all areas within the APE will be subject to ground disturbance. There are four proposed locations for the new building. All lands within the APE are managed by the National Park Service.

**3. Has the area of potential effects been surveyed to identify historic properties?**

☐ No

☒ Yes

**Source or reference:** Horton E. A. 2010, Survey for Three Pedestrian Trails at AC.  
Horton, E. A. 2010 Upgrades to Infrastructure at American Camp and English Camp  
Cromwell, B. 2003 AC VC Parking Lot  
Horton, E. A. 2011 Survey for Wayside Exhibits at AC and EC  
O'Rourke, Leslie 2009 Archaeological Survey at the Site of the Rosler Homestead, American Camp, San  
Ripin, J. 2018 Archeological Survey and AOE for AC VC  
Davis, C 2008 Damage Assessment Report  
NPS. Cultural Landscape Inventory for American and English Camps, San Juan Island NHP. 2004.

#### 4. Potentially Affected Resource(s):

##### Archeological Resources Affected: Yes

**Property Name:** Rosler Homestead 45-SJ-504

**Location:** American Camp

**Property Name:** SAJH-ACVC-01 (Temporary No.)

**Property Name:** SAJH-ACVC-02 (Temporary No.)

##### Historical Structures/Resources Affected: No

**Historical Structures/Resources Notes:** No historic structures are present

##### Cultural Landscapes Affected: Yes

**Property Name:** American Camp Cultural Landscape

**Location:** American Camp

**Cultural Landscapes Notes:** The selected alternative is estimated to remove 28 trees from the remnant forest, a contributing element of the cultural landscape.

##### Ethnographic Resources Affected: No

**Ethnographic Resources Notes:** The park made a request to Traditionally Associated Native American Tribes and Groups through official correspondence seeking information on ethnographic resources within the identified area of potential effects. No ethnographic resources were identified.

#### 5. The proposed action will: (check as many as apply)

☐ No Destroy, remove, or alter features/elements from a historic structure

☐ No Replace historic features/elements in kind

☐ No Add non-historic features/elements to a historic structure

☐ Yes Alter or remove features/elements of a historic setting or environment (inc. terrain)

☐ Yes Add non-historic features/elements (inc. visual, audible, or atmospheric) to a historic setting or cultural landscape

☐ No Disturb, destroy, or make archeological resources inaccessible

☐ No Disturb, destroy, or make ethnographic resources inaccessible

☐ Yes Potentially affect presently unidentified cultural resources

☐ No Begin or contribute to deterioration of historic features, terrain, setting, landscape elements, or archeological or ethnographic resources

☐ No Involve a real property transaction (exchange, sale, or lease of land or structures)

☐ Other (please specify): \_\_\_\_\_

## 6. Supporting Study Data:

(Attach if feasible; if action is in a plan, EA or EIS, give name and project or page number.)

1) Consultation Letter (combined to all parties): Step 1. Initiate 106; 2) APE Map; 3) Historic property research design and scope of work; 4) Step 1 email response from Skokomish; 5) Step 1 response from SHPO; 6) Step 3 letter to SHPO Assessment of Effects; 7) Step 3 letter to Tribes (combined) Assessment of Effect; 8) Archeology Report; 9) Step 3 SHPO response, concurrence; 10) Assessment of Effects Table.

## B. REVIEWS BY CULTURAL RESOURCE SPECIALISTS

The park 106 coordinator requested review by the park's cultural resource specialist/advisors as indicated by check-off boxes or as follows:

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### [ X ] 106 Advisor

**Name:** Sara Dolan

**Date:** 02/15/2019

**Comments:** The SAJH CR team determined that the undertaking would not directly or indirectly alter any of the characteristics that qualified the properties for listing on the National Register of Historic Places in a way that would diminish their integrity. No historic buildings are affected by the project so no historical architect review was required.

The park initiated consultation with the SHPO on March 17, 2017 (steps 1 and 2). The park sent an assessment of no adverse effect (step 3) letter to SHPO on December 20, 2018. The SHPO responded on January 2, 2019 and concurred with the park's finding of no adverse effect.

**Check if project does not involve ground disturbance** [   ]

**Assessment of Effect:**   ☐ No Potential to Cause Effect   ☐ No Historic Properties Affected   ☒ No Adverse Effect   ☐ Adverse Effect   ☐ Streamlined Review

**Recommendations for conditions or stipulations:**

**Doc Method:** Standard 4-Step Process

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### [ X ] Anthropologist

**Name:** Joe Dolan

**Date:** 02/15/2019

**Comments:** On March 15, 2017, the NPS requested assistance with the identification of any properties of religious and cultural significance, resources, practices or traditions that could be adversely affected by construction of the proposed visitor center and its associated development within the proposed area of potential effects. One tribe, the Skokomish Indian Tribe, a federally recognized American Indian tribe, responded via correspondence dated May 8, 2017, that they had no comment.

On November 14, 2018, the NPS held an in-person meeting with representatives from the Lummi Nation in Friday Harbor, Washington, to discuss the project and to disseminate draft content for schematic design.

On December 21, 2018, the NPS transmitted via official email correspondence the park's assessment of effect for the proposed undertaking as well as the park's finding of no adverse effect for 30-day review in accordance with 36 CFR 800.5(c). The final archeological report with results of an archeological survey and testing conducted in support of the project was also transmitted with the park's assessment of effect.

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No comments or concerns from traditionally associated tribes and groups regarding the undertaking or the park's assessment of effect were identified. Consultation with traditionally associated tribes and groups involving content for exhibit design is ongoing with additional meetings planned for early 2019.

**Check if project does not involve ground disturbance** [ ☐ ]

**Assessment of Effect:** ☐ No Potential to Cause Effect ☐ No Historic Properties Affected ☒ No Adverse Effect ☐ Adverse Effect ☐ Streamlined Review

**Recommendations for conditions or stipulations:** Follow park archeologist's recommendation for monitoring of ground disturbing actions within site boundaries.

**Doc Method:** Standard 4-Step Process

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[ ☒ ] **Archeologist**

**Name:** Jeremy Ripin

**Date:** 12/19/2018

**Comments:** A records search was conducted of the APE; additional archeological investigations were performed. A total of three archeological sites would be affected; however, impacts to archeological resources would not affect eligibility of sites or the NHL.

**Check if project does not involve ground disturbance** [ ☐ ]

**Assessment of Effect:** ☐ No Potential to Cause Effect ☐ No Historic Properties Affected ☒ No Adverse Effect ☐ Adverse Effect ☐ Streamlined Review

**Recommendations for conditions or stipulations:** professional archeologist should monitor ground disturbance.

**Doc Method:** Standard 4-Step Process

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[ ☒ ] **Historian**

**Name:** Christopher Johnson

**Date:** 05/03/2018

**Comments:** This project will replace the "temporary" visitor center at SAJH with a new permanent building in the same location. New construction, including the rerouting of the entrance road, will not affect any contributing resources to the NHL. It will also be largely screened from view from contributing areas of the NHL by a row of trees. The project will have minor effects on two historic archeological sites. The sites are not associated with the NHL period of significance and, according to the park assessment, are ineligible for listing in the National Register. No materials associated with non-extant historic buildings that were located in those areas during the period of significance were identified in the survey.

**Check if project does not involve ground disturbance** [ ☐ ]

**Assessment of Effect:** ☐ No Potential to Cause Effect ☐ No Historic Properties Affected ☒ No Adverse Effect ☐ Adverse Effect ☐ Streamlined Review

**Recommendations for conditions or stipulations:** Please include a detailed description of the affected archeological sites with a thorough explanation for the determination of non-eligibility in the report to SHPO.

**Doc Method:** Standard 4-Step Process

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☒ **cultural landscapes**

**Name:** Vida Germano

**Date:** 05/04/2018

**Comments:** This project will have no adverse effect to the cultural landscape. The new facilities are sited in a way that they will not be seen from key viewpoints within the cultural landscape. The project will require removal of a limited number of trees from the remnant stand. However, this tree removal is limited to newer growth trees and there will not be a noticeable visual difference in the tree stand canopy.

**Check if project does not involve ground disturbance** ☐

**Assessment of Effect:** ☐ No Potential to Cause Effect ☐ No Historic Properties Affected ☒ No Adverse Effect ☐ Adverse Effect ☐ Streamlined Review

**Recommendations for conditions or stipulations:** Revise EA based on my comments submitted in April.

**Doc Method:** Standard 4-Step Process

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**No Reviews From:** Curator, Historical Architect, Historical Landscape Architect

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## **C. PARK SECTION 106 COORDINATOR'S REVIEW AND RECOMMENDATIONS**

### **1. Assessment of Effect:**

☐ No Potential to Cause Effects  
☐ No Historic Properties Affected  
☒ No Adverse Effect  
☐ Adverse Effect

### **2. Documentation Method:**

☒ **A. Standard 36 CFR Part 800 Consultation**

Further consultation under 36 CFR Part 800 is needed.

☐ **B. Streamlined Review Under the 2008 Servicewide Programmatic Agreement (PA)**

The above action meets all conditions for a streamlined review under section III of the 2008 Servicewide PA for Section 106 compliance.

### **Applicable Streamlined Review Criteria**

(Specify 1-16 of the list of streamlined review criteria.)

☐ **C. Undertaking Related to Park Specific or Another Agreement**

The proposed undertaking is covered for Section 106 purposes under another document such as a park, region or statewide agreement established in accord with 36 CFR 800.7 or 36 CFR 800.14.

☐ **D. Combined NEPA/NHPA Process**

Process and documentation required for the preparation of an EA/FONSI or an EIS/ROD to comply with Section 106 is in accord with 36 CFR 800.8.c.

☐ **E. Memo to Project File**

Assessment of Effect Form - Replace Temporary American Camp Visitor Center with New Permanent Building -  
PEPC ID: 58302

### 3. Consultation Information

**SHPO Required:** Yes

**SHPO Sent:** Dec 20, 2018

**SHPO Received:** Jan 2, 2019

**THPO Required:** Yes

**THPO Sent:** Dec 20, 2018

**THPO Received:**

**SHPO/THPO Notes:** From SHPO: "We concur with your Determination of No Adverse Effect with the stipulations for professional archaeological monitoring and revision of the existing professional report to include these findings and the Smithsonian Numbers for the discovered archaeological resources. Please provide and upload the revised professional report when available."

**Advisory Council Participating:** No

**Advisory Council Notes:**

**Additional Consulting Parties:** Yes

**Additional Consulting Parties Notes:**

- Lummi Nation
- WA Jamestown S'Klallam Tribe
- Swinomish Indian Tribal Community
- Samish Indian Nation
- Nooksack Tribe
- Port Gamble S'Klallam Tribe
- Skokomish Tribe Tulalip Tribes of Washington
- Lower Elwha Tribe
- Stillaguamish Tribe of Indians
- Upper Skagit Tribe
- Tsartlip First Nation, British Columbia
- Tsawout First Nation, British Columbia
- Songhees Nation, British Columbia

**4. Stipulations and Conditions:** Following are listed any stipulations or conditions necessary to ensure that the assessment of effect above is consistent with 36 CFR Part 800 criteria of effect or to avoid or reduce potential adverse effects.

Professional archaeological monitoring

**5. Mitigations/Treatment Measures:** Measures to prevent or minimize loss or impairment of historic/prehistoric properties: (Remember that setting, location, and use may be relevant.)

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

**6. Assessment of Effect Notes:**

The undertaking would not directly or indirectly alter any of the characteristics that qualified the properties for listing on the National Register of Historic Places in a way that would diminish their integrity.

**D. RECOMMENDED BY PARK SECTION 106 COORDINATOR:**

**Compliance Specialist:**

**NHPA Specialist**


Sara Dolan



Date:

2-15-19

Jeremy Ripin



Date:

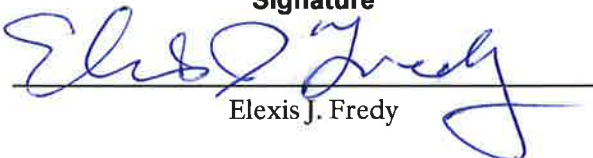
2-15-19

**E. SUPERINTENDENT'S APPROVAL**

The proposed work conforms to the NPS *Management Policies* and *Cultural Resource Management Guideline*, and I have reviewed and approve the recommendations, stipulations, or conditions noted in Section C of this form.

**Signature**

**Superintendent:**

  
Elaxis J. Fredy

Date:

2/15/19